

Rule 15.05.04.T1 High Risk Global Engagements and High Risk International Collaborations



Approved: February 10, 2023
Revised: May 21, 2025
Next Scheduled Review: May 21, 2030

Rule Summary

This rule is required by and supplements The Texas A&M University System (system) Regulation 15.05.04, *High Risk Global Engagements and High Risk International Collaborations*, to establish guidelines and roles and responsibilities for High Risk Global Engagement and High Risk International Collaboration administration at Tarleton State University (Tarleton State).

Definitions

Refer to [System Regulation 15.05.04 Definitions](#) for definition of terms.

Rule

1. GENERAL

1.1 PURPOSE

Tarleton State encourages its employees to establish global engagements in the pursuit of mutually beneficial fundamental scientific inquiry, cultural, or educational opportunities. These activities strengthen the academic and research programs are fundamental to the university's educational system. The university is committed to protecting the integrity of university research and educational programs, including the interests of all involved in contractual relationships and international collaborations – *research sponsors, the university, university employees, and international collaborators*. Research relationships that promote equitable collaborations invigorate fundamental scientific inquiry, cultural, and educational opportunities and are fundamental to university processes.

1.2 PROHIBITIONS AND REPORTING REQUIREMENTS

- 1.2.1 University employees are prohibited from participating in Malign Foreign Talent Recruitment Programs.
 - 1.2.1.1 Any university employee who receives a solicitation to participate in a Malign Foreign Talent Recruitment Program, as defined by System Regulation 15.05.04, must notify University Compliance by submitting a [Country of Concern Contact Reporting Form](#) located on the University Compliance Export Controls webpage. University Compliance will forward any reports received, along with any supplemental information, to the vice president of research, innovation and economic development/export control empowered official (EO) and the System Research Security Office (RSO).
 - 1.2.1.2 All university employment manuals or handbooks will include the prohibition for employees from taking part in any Malign Foreign Talent Recruitment Program, regulatory references, and reporting requirements.
- 1.2.2 The university is prohibited from maintaining contracts or agreements with a Confucius Institute.
- 1.2.3 University employees are prohibited from accepting gifts or traveling to a Country of Concern, as defined by System Regulation 15.05.04, for professional purposes.
 - 1.2.3.1 Any university employee approached by groups representing a Country of Concern offering gifts, including travel, must notify University Compliance by submitting a [Country of Concern Contact Reporting Form](#) located on the University Compliance Export Controls webpage. University Compliance will forward any reports received, along with any supplemental information, to the EO and System RSO.
 - 1.2.3.2 University employees traveling personally to a Country of Concern must report pre-travel and post-travel reports in Workday.
- 1.2.4 University employees are prohibited from entering into High Risk Global Engagements and participating in High Risk International Collaborations with entities on the most recent list developed pursuant to Section 1286 of the National Defense Authorization Act for Fiscal Year 2019 (Public Law 115-232) as amended.
- 1.2.5 Federal Funding Agency Research Security Inquiries – The EO will notify the System RSO of any federal funding agency's request for research security related risk reviews. Response to the inquiring federal funding agency will be coordinated with the EO, System RSO and the Office of General Counsel (OGC).

2. ROLES AND RESPONSIBILITIES

- 2.1 The university EO is herein delegated responsibility for oversight and facilitating the review and approval process for High Risk Global Engagements and High Risk Collaborations at Tarleton State.
 - 2.1.1 The EO may, upon review, deny a request or convene the university's Executive Leadership Management Council, as necessary, for review and approval of High Risk Global Engagements and High Risk Collaborations.
 - 2.1.2 In accordance with System Regulation *15.05.04*, and no later than 10 business days in advance of execution of a High Risk Global Engagement or the proposed start date of a High Risk Collaboration, the EO will submit university-approved engagements and collaborations under this rule to the System RSO for system review and approval. The request for System RSO review must include all relevant review information and materials utilized to conduct the university's review.
 - 2.1.3 In accordance with System Regulation *15.05.04*, the EO will provide to the System RSO a courtesy copy of all relevant review materials and information for High Risk Global Engagements and High Risk Collaborations not approved by the university under this rule.
 - 2.1.4 The EO will notify the requestor and University Compliance in writing of the final decision.
- 2.2 The university's Executive Leadership Management Council, comprised of the EO, executive vice president of academic affairs and provost (provost), and executive vice president for finance and administration/chief financial officer (CFO), is authorized to recommend approval of High Risk Global Engagements and High Risk Collaborations on behalf of Tarleton State, to be sent through the final System Regulation *15.05.04* process.
- 2.3 The university's Executive Leadership Management Council may be convened by the EO to recommend approval/disapproval, and assist the EO in addressing any potential conflicts of commitment, conflicts of interest, export control concerns, or undue foreign influence concerns arising from relationships with High Risk Global Engagements or High Risk International Collaborations.
- 2.4 The EO, as the university's designated sponsored research conflict of interest official (COI Official), per System Regulation *15.01.03*, *Financial Conflicts of Interest in Sponsored Research*, and Tarleton State Rule *15.01.03.T1*, *Financial Conflicts of Interest in Sponsored Research*, has the authority to address any COI disclosures of concerns related to High Risk Global Engagements and High Risk International Collaborations or the EO may convene the Executive Leadership Management Council.

- 2.5 The provost, as delegated approval authority for faculty consulting and/or external professional employment, per System Regulation *31.05.01, Faculty Consulting and/or External Professional Employment*, and Tarleton State Rule *31.05.01.T1, Faculty Consulting and/or External Professional Employment*, will review any faculty submissions of concern related to High Risk Global Engagements and High Risk International Collaborations with the Executive Leadership Management Council.
- 2.6 University Compliance, as the university's delegated office of authority for administration of the export control compliance program, per Tarleton State Rule *15.02.99.T1, Export Control Program Management*, will submit High Risk Global Engagements and High Risk International Collaborations identified through the export control compliance program to the EO for review, approval, and final submission to the System RSO for final system review and approval pursuant to System Regulation *15.05.04*. University Compliance will monitor the System RSO's quarterly list of Countries of Concern and disseminate any updates to university stakeholders.
- 2.7 University administrators, departments/units, and employees must submit all Global Engagements and International Collaborations to Compliance for export control compliance review.
- 2.8 All university employees must adhere to this rule and all other related state and federal laws, system policies and regulations, and university rules and procedures.
- 2.9 All university employees are required to complete export control training once every two years. University Compliance will monitor training completions on a quarterly basis to ensure training is completed in a timely manner. Outstanding training completions will be elevated to the respective vice president, as deemed necessary.

3. MONITORING AND ASSESSMENTS

- 3.1 University Compliance, in coordination with university departments/units with responsibility for administering components of the university's export control compliance program, will perform routine internal monitoring of the respective department/unit export control processes and procedures to ensure High Risk Global Engagements and High Risk Collaborations are being appropriately identified and routed through the required review and approval process under this rule.
- 3.2 University Compliance will annually assess risks associated with the university's export control portfolio, including risks associated with High Risk Global Engagements and High Risk International Collaborations, and recommend improvements, as needed.
- 3.3 University Compliance will conduct an annual assessment survey of administrators and other applicable employees regarding compliance with this rule and all other related state and federal laws, system policies and regulations, and university rules and procedures. Individual exceptions to compliance will be investigated in accordance to section 4 of this rule.

4. POSSIBLE VIOLATIONS

- 4.1 Possible violations of this rule and all other related state and federal laws, system policies and regulations, and university rules and procedures will be investigated by University Compliance in coordination with the EO and Human Resources and the System RSO to the extent deemed necessary.
- 4.2 If through investigation it is determined that any activity is not in compliance or may lead to noncompliance, the EO is authorized to suspend or terminate the activity and the System RSO and OGC will be notified to the extent deemed necessary.

5. DISCIPLINARY ACTIONS

- 5.1 Failure to comply with this rule and any other related laws, policies, regulations, rules and procedures may result in disciplinary action up to and including dismissal in accordance with system policies and regulations and university rules and procedures.

Related Statutes, Policies, or Requirements

[Section 117 of the Higher Education Act of 1965, 20 U.S.C. 1011f](#)

[International Traffic in Arms Regulations \(ITAR\) 22 CFR 120-130](#)

[Export Administration Regulations \(EAR\) 15 CFR 730-774](#)

[Chips and Science Act of 2022 \(Public Law 117-167\)](#)

[Servicemember Quality of Life Improvement and National Defense Authorization Act for Fiscal Year 2025 \(Public Law 118-159\)](#)

[Executive Order GA 48 by the Governor of the State of Texas](#)

[John S. McCain National Defense Authorization Act for Fiscal Year 2019 \(Public Law 115-232\)](#)

[System Regulation 15.01.03, *Financial Conflicts of Interest in Sponsored Research*](#)

[Tarleton State Rule 15.01.03.T1, *Financial Conflicts of Interest in Sponsored Research*](#)

[System Policy 15.02, *Export Control Program Management*](#)

[Tarleton State Rule 15.02.99.T1, *Export Control Program Management*](#)

[System Policy 15.05, *System Research Security Office*](#)

[System Regulation 15.05.04, *High Risk Global Engagements and High Risk International Collaborations*](#)

[System Policy 25.07, Contract Administration](#)

[Tarleton State Rule 25.07.99.T1, Contract Administration](#)

[System Regulation 25.07.01, Contract Administration, Delegations and Reporting](#)

[System Regulation 31.05.01, Faculty Consulting and/or External Professional Employment](#)

[Tarleton State Rule 31.05.01.T1, Faculty Consulting and/or External Professional Employment](#)

[Country of Concern Contact Reporting Form](#)

Contact Office

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