



Rule

15.05.04.L1

High Risk Global Engagements and High Risk International Collaborations

First Approved: July 27, 2023
Next Scheduled Review: July 27, 2028

Rule Statement and Reason for Rule

Texas A&M International University (TAMIU) encourages its employees to establish global engagements in the pursuit of mutually beneficial opportunities while noting the high risk of certain global engagements and international collaboration. This rule is required by [System Regulation 15.05.04, High Risk Global Engagements and High Risk International Collaborations](#).

Procedures and Responsibilities

1. GENERAL

- 1.1 TAMIU will fully comply with all applicable federal laws and regulations, along with System Regulations, concerning high risk global engagements and high risk international collaborations.
- 1.2 TAMIU business activities or transactions will not be initiated or conducted with any Foreign Persons from Countries of Concern unless otherwise approved through the approval process detailed in System Regulation 15.05.04.

2. EMPOWERED OFFICIAL

- 2.1 The Associate Vice President for Research and Sponsored Projects is the TAMIU Empowered Official (EO) and serves as the TAMIU designated official for high risk global engagements and high risk international collaborations.

3. INDIVIDUAL RESPONSIBILITIES

- 3.1 All TAMIU employees should be aware of the potential of high risk global engagements and high risk international collaborations involved in their work and must ensure that their activities and transactions comply with federal, state, System and TAMIU laws and

regulations. It is the responsibility of TAMIU faculty and staff to disclose these activities to the EO.

4. RISK REVIEW AND APPROVAL

- 4.1 The review of high risk global engagements and high risk international collaborations will include the EO and the Director of Compliance.
 - 4.1.1 The EO will review the high risk engagement or high risk collaboration. The review will include a restricted party screening and ensuring the engagement or collaboration is compliant with Bureau of Industry and Security (BIS), Directorate of Defense Trade Controls (DDTC), Office of Foreign Asset Control (OFAC), Texas A&M System, and any other relevant regulations.
 - 4.1.2 Once the ECO or designee has reviewed the high risk engagement or high risk collaboration, it will be forwarded to the System RSO for review pursuant to System Regulation 15.05.04.
 - 4.1.3 The System RSO will provide the VCR's final approval determination to the TAMIU ECO and the TAMIU Director of Compliance regarding the high risk global engagement or high risk international collaboration.
- 4.2 All TAMIU employees are required to take the basic course for export controls and embargo training (course number 211212) available through TrainTraQ. Employees involved in high risk global engagements or high risk international collaborations, may be required to take supplemental export controls training as deemed appropriate by the TAMIU EO.

5. RECORD KEEPING

- 5.1 All export control decisions and screening results will be documented, and copies retained by the TAMIU EO or designee.
- 5.2 Records shall be maintained and retained for the longer of the record retention period required by the applicable regulation or the period required for the retention of these records as set forth in the System Record Retention Schedule and [TAMIU SAP 61.99.01.L0.01, Retention of State Records](#).
- 5.3 TAMIU units shall be responsible for maintaining all documentation related to high risk global engagements and high risk international collaborations, in accordance with requirements set forth in System Regulation 15.05.04, section 3(e)(3).

Related Statutes, Policies, Regulations, or Rules

[System Policy 15.05.04, High Risk Global Engagements and High Risk International Collaborations](#)
[TAMIU Rule 15.02.99.L1, Export Controls](#)
[TAMIU SAP 61.99.01.L0.01, Retention of State Records](#)
[TAMIU Export Control Compliance Program Manual](#)

Definitions

Definitions are consistent with those contained in System Regulation 15.05.04.

Contact Office

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