

15 | High Risk Global Engagements and High Risk International Collaborations

Approved: July 13, 2023

Next Scheduled Review: July 13, 2023

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GUIDELINE SUMMARY

The College of Agriculture and Life Sciences (College) encourages its employees to establish global engagements in the pursuit of mutually beneficial fundamental scientific inquiries, cultural, or educational opportunities. These activities strengthen the academic and research program and are fundamental to each member's educational system.

DEFINITIONS

Click to view [Definitions](#).

PROCEDURES AND RESPONSIBILITIES

1. PURPOSE AND BACKGROUND

The College is committed to protecting the integrity of research and educational programs, including the interest of all involved in contractual relationships and international collaborations. International Collaborations that promote equitable, scientific inquiry, cultural, and educational opportunities are fundamental to our mission.

This rule is required by the [Texas A&M University System Regulation 15.05.04, High Risk Global Engagements and High Risk International Collaborations](#) and is developed to ensure compliance with all related federal, state and system policies, regulations, and rules as well as establish formal procedures and guidelines related to [High Risk Global Engagements](#) and [High Risk International Collaborations](#).

2. HIGH RISK GLOBAL ENGAGEMENT AND HIGH RISK INTERNATIONAL COLLABORATION ADMINISTRATION

2.1 Review and Approval Process

- a) On a quarterly basis, the (Texas A&M University System) Research Security Office (RSO) provides member-empowered officials (EOs) with the list of [countries of concern](#).
- b) AgriLife Ethics and Compliance (Ethics and Compliance) will conduct an initial review of all High Risk Global Engagements and High Risk International Collaborations for any potential conflicts of commitment, conflicts of interest, export control or undue foreign influence concerns arising from these potential relationships. These engagements and collaborations are found within the [definitions](#) of System Regulation 15.05.04, and includes, but is not limited to contracts, and funded or unfunded research relationships with Foreign Persons based outside the United States in a Country of Concern that would be captured through the contractual process.
- c) Prior to executing High Risk Global Engagements or establishing High Risk Collaborations, Ethics and Compliance will submit the arrangement to RSO for review in accordance with [System Regulation 15.05.04](#).
- d) RSO provides a risk review of the proposed High Risk Global Engagement or High Risk International Collaboration to the (Texas A&M University System) Office of General Counsel (OGC).

- e) OGC reviews the High Risk Global Engagement or High Risk International Collaboration for legal compliance. The combined risk and legal compliance reviews are forwarded to the (Texas A&M University System) Vice Chancellor for Research for consideration.
- f) The Vice Chancellor for Research reviews and determines whether to provide approval for the High Risk Global Engagement or High Risk International Collaboration with notification to the RSO.
 - I. RSO will inform Ethics and Compliance of the decision rendered by the Vice Chancellor for Research.
 - i. Denials from the Vice Chancellor for Research are final and there is no appeal process.
 - II. Approvals for High Risk Global Engagement or High Risk International Collaborations are valid for the duration of the contract or collaboration. If any amendments are made to the contract or collaboration, a new review process is required.
 - III. Employees involved in High Risk Global Engagement or High Risk International Collaborations are required to complete the TrainTraq Export Control training once every two years. This training will be assigned by Ethics and Compliance at the time of their initial review.
 - IV. High Risk Global Engagement records must be maintained in Laserfiche in accordance with guidance and approval from RSO, the System Records Retention Schedule, and [AgriLife Research Procedure 61.99.01.A0.01, Retention of State Records](#).
- g) RSO provides a High Risk Global Engagement or High Risk International Collaboration briefing to the Board of Regents annually. This briefing summarizes the risks to the system associated with international activities.

RELATED STATUTES, POLICIES, OR REQUIREMENTS

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

[Section 117 of the Higher Education Act of 1945, 20 U.S.C. 1011f](#)

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

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

[A&M System Policy 15.02, Export Controls Program Management](#)

[A&M System Policy 25.07, Contract Administration](#)

[A&M System Policy 25.07.01, Contract Administration, Delegations and Reporting](#)

[College of Agriculture and Life Sciences Guidelines, Export Controls](#)

~~[AgriLife Research Procedure 61.99.01.A0.01, Retention of State Records](#)~~

[AgriLife Export Controls Compliance Program Manual](#)

[AgriLife Research Delegation of Authority for Contract Administration](#)

CONTACT OFFICE

Questions regarding this guideline should be referred to AgriLife Ethics and Compliance Director Debi Fincher at 979-314-3441.

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