

15.05.04.W1 High Risk Global Engagements and High Risk International Collaborations



Approved May 17, 2023
Next Scheduled Review May 17, 2028

Rule Summary

West Texas A&M University (WTAMU) encourages its employees to establish global engagements in the pursuit of mutually beneficial fundamental scientific inquiry or cultural, educational, or philanthropic opportunities. These activities strengthen the academic and research programs and are fundamental to WTAMU's educational system.

The purpose of this rule is to identify the required reviews, notifications, and approvals for work involving High Risk International Engagements or Collaborations.

Rule

1. DESIGNATED OFFICIAL

The WTAMU Empowered Official (EO), pursuant to WTAMU Rule 15.02.99.W1, serves as WTAMU's designated official for high risk global engagements and high risk international collaborations.

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

2.1. All high risk global engagements and high risk international collaborations will be reviewed by the WTAMU EO, in collaboration with the university president, and the WTAMU Export Control Office before the proposed activity is submitted to the Texas A&M University System (System) Research Security Office (RSO) for review and approval as defined in System Regulation 15.05.04.

2.2. The WTAMU EO, in consultation with the university president, may deny the activity at any time during the review process. If the activity is denied after

submitting to the System RSO, the EO will notify the WTAMU Export Control Office (ECO) and the ECO will immediately notify the System RSO of the determination.

- 2.3. The WTAMU ECO may engage other university offices to review the proposed activity for conflicts of commitment, conflicts of interest, and undue foreign influence arising from relationships with High Risk Global Engagements and High Risk International Collaborations. This information will be shared with the WTAMU EO, who consults with the university president, and System RSO.
- 2.4. Upon confirmation from the EO, in consultation with the university president, the WTAMU ECO will ensure all high risk global engagements or high risk international collaborations are submitted to the System RSO for approval pursuant to System Regulation 15.05.04.
- 2.5. The System RSO will complete the review process pursuant to System Regulation 15.05.04 and provide the Vice Chancellor for Research's (VCR) final approval/non approval decision. Upon receipt of the VCR decision, the WTAMU ECO will notify the WTAMU EO. The WTAMU EO will notify the University President. If the VCR decision is non approval of the associated high risk engagement or collaboration, the ECO will notify all university offices involved of that final decision. If the VCR approves continuation of the engagement or collaboration, the University President may determine whether to decline or accept the continuation decision based on any mitigating measures (as applicable). Upon the decision for continuation of the high risk engagement or collaboration by both VCR and the University President, the EO will notify the ECO, who will notify all university offices involved of the decision and of all required mitigating measures (as applicable). The university office responsible for the high risk engagement or collaboration must maintain sufficient documentation to demonstrate adherence to required mitigating measures (as applicable). In the event multiple offices are involved in the engagement or collaboration, the offices must notify the WTAMU ECO of how the administrative oversight will be shared. If needed, the burden of administrative oversight will be determined by the WTAMU EO.
- 2.6. Approved high risk global engagements or high risk international collaborations are valid for the duration of the contract or collaboration, or designated timeline. Any changes, modifications, or amendments to the contract or collaboration will require initiation of a new review process.

2.7. The WTAMU Export Control Office will maintain a document list of all high risk global engagements and all high risk international collaborations on the password and firewall protected WTAMU network, G: drive.

3. TRAINING

3.1. Employees or students involved in high risk global engagements or high risk international collaborations are required to complete the "Export Controls and Embargo Training" (course number 2111212) via TrainTraq at least once every two years.

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](#)

[System Policy 15.02, Export Controls 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](#)

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

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

Definitions

Refer to [System Regulation 15.05.04, High Risk Global Engagements and High Risk International Collaborations](#) for definitions related to this rule.

Revision History

Initial Rule May XX, 2023

Contact Office

Risk and Compliance
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Approval Office

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Approval Signature



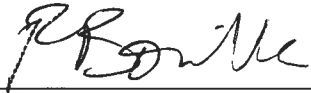
Walter Wendler
President/CEO

05/25/23

Date

System Approvals*

Approved for Legal Sufficiency:



Ray Bonilla
General Counsel

5/16/23

Date

Approved:



John Sharp
Chancellor

5/17/23

Date

***System approvals are contingent upon incorporation of any and all System-required changes in the rule's final posting.**