PRAIRIE VIEW A&M UNIVERSITY UNIVERSITY RULE

15.05.04.P1 High Risk Global Engagements and High Risk International Collaborations

Approved: March 13, 2023 Next Scheduled Review: March 13, 2028



Rule Statement

Prairie View A&M University (PVAMU) is committed to conducting research and educational activities in a manner consistent with the highest standards of integrity and ethics. This Rule is adopted to formalize a review process for high risk global engagements and high risk international collaborations ensuring the safety of PVAMU's faculty, staff, and students engaging in international activities pursuant of mutually beneficial fundamental scientific inquiry, cultural, and/or educational opportunities.

Reason for Rule

This Rule implements the requirements of System Regulation <u>15.05.04</u>, <u>High Risk Global Engagements and High Risk International Collaborations</u>.

Official Procedures and Responsibilities

1. AUTHORIZED OFFICIALS TO REVIEW HIGH RISK GLOBAL ENGAGEMENTS/HIGH RISK INTERNATIONAL COLLABORATIONS

- 1.1 The Vice President for Research and Innovation, also the Empowered Official (EO), or designee maintains the Export Controls Officer role for PVAMU.
- 1.2 The Executive Director of International Programs or designee maintains the role of engaging in international research, teaching, studying, and service for PVAMU.

2. REVIEW OF HIGH RISK GLOBAL ENGAGEMENTS/HIGH RISK INTERNATIONAL COLLABORATIONS

- 2.1 Any employee of PVAMU shall notify the Export Controls Office and the Office of International Programs if they will be a part of any global engagement(s) and/or any international collaboration(s). They must notify the aforementioned offices immediately prior to conducting the international activity.
 - 2.1.1 The Executive Director of International Programs is responsible for the preliminary review of global engagements or international collaborations whether initiated internally or externally before routing to the Export Controls Officer (ECO) for high risk determination. The preliminary review consists of ensuring there is no potential conflict of commitment, conflict of interest, health and safety risk, or undue foreign influence.

2.1.2 In accordance with System Regulation 15.02 and PVAMU Rule 15.02.99.P1, the ECO will review all high risk global engagements and international collaborations prior to referring the proposed international activity to the System Research Security Office (RSO) for review and approval process defined in System Regulation 15.05.04. In addition to an export controls review, the ECO may engage other PVAMU offices to review the proposed activity for conflicts of commitment, conflicts of interest, and undue foreign influence.

3. REVIEW RESULTING HIGH RISK

- 3.1 Once the comprehensive review is completed by the ECO, the ECO has the authority to deny the high risk proposed activity prior to submitting to the System RSO for review and approval pursuant to System Regulation 15.05.04.
- 3.2 The EO can also recommend approval, then must route the high risk proposed activity by submitting it to the System RSO for review and approval pursuant to System Regulation <u>15.05.04</u>.
- 3.3 Once a final approval determination is provided by the System RSO, the ECO will notify any other PVAMU offices possibly involved. Any defined mitigating measures for approvals will be monitored by the ECO or designated PVAMU office.
- 3.4 All high risk global engagements and high risk international collaborations will be maintained in Maestro.
- 3.5 The ECO will ensure training in TrainTraq Course #2111212 is completed by PVAMU individuals involved in high risk global engagements or high risk international collaborations once every two years.

Related Statutes, Policies, Regulations and Rules

University Rule 15.02.99.P1 Export Controls Program Management

System Policy 15.02, Export Controls Program Management

Resources - PVAMU Office of International Programs

Export Administration Regulations (EAR) 15 C.F.R. §§700-799

International Traffic in Arms Regulations (ITAR) 22 C.F.R. §§120-130

Section 117 of the Higher Education Act of 1965, 20 U.S.C. 1011f

<u>System Regulation 15.05.04, High Risk Global Engagements and High Risk International</u> 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

| Contact Office | |
|----------------------------------|--------------|
| Office of Research Compliance | 936-261-1553 |
| Office of International Programs | 936-261-2132 |