



Texas A&M University

# RESEARCH SECURITY *and* EXPORT CONTROLS

*The Division of Research is committed to promoting and ensuring the highest standards of research integrity in proposing, conducting and reporting research. Through its various programs, the division provides information and guidance in areas such as export controls, conflicts of interest/commitment, visiting scholars and responsible conduct of research.*



## RESPONSIBLE CONDUCT OF RESEARCH

Texas A&M University is committed to supporting responsible and ethical conduct of research and scholarship among its faculty, staff and students. As such, the university follows federal, state and university guidelines regarding responsible conduct of research (RCR) training. Individuals receiving support from federal funds are required to complete RCR training per the granting agency requirements. Additionally, students and postdoctoral fellows are required to complete RCR training per University SAP 15.99.99.M0.04. RCR training covers topics such as authorship, plagiarism, peer review, human subjects' protections, animal welfare, research data management, conflicts of interest, collaborative research, export controls, scientific ethics, safe research environments, and research security/IT awareness, among others.

## FINANCIAL CONFLICTS OF INTEREST

In order to promote objectivity in research, all investigators are required to disclose any involvement that might constitute a financial conflict of interest (FCOI) as applied to all

externally sponsored research activities. Investigators include any person, regardless of title or position, who is responsible for the design, conduct or reporting of research or research activities. Investigators must submit a Financial Disclosure Statement to the COI Official via the Huron Research Suite: (1) within 30 days of initial employment; (2) prior to the submission of an application for funding; (3) at least annually; and (4) within 30 days of acquiring a new significant financial interest requiring disclosure.

## CONFLICT OF COMMITMENT

The goal of Texas A&M is to provide a transparent system of disclosure of its employees' external activities which might raise concerns about conflicts of commitment. This procedure gives the institution the responsibility to protect the credibility and reputation of the university and its faculty and staff when employees are engaged in external activities, ensures compliance with state ethics laws and The Texas A&M University System Policies and Regulations, and addresses conflicts between external, professional, and non-professional activities and university responsibilities.

## TIME AND EFFORT

Our office is responsible for the oversight of Time and Effort reporting for TAMU, TAMUG, TAMU Health and TAMUS. In addition, our office oversees Time and Effort Central Administration (TECA for the entire Texas A&M System. As a recipient of federal funds, Texas A&M is subject to financial accounting and reporting obligations designed to ensure that the charges to its federally sponsored projects are allowable and properly allocated. The University's electronic effort certifications system provides the principal means for accomplishing effort certification.

## CONTACT

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TEXAS A&M UNIVERSITY

Division of Research

[vpr.tamu.edu](http://vpr.tamu.edu)

# INTERNATIONAL COLLABORATIONS

## EXPORT CONTROLS

Export control laws and regulations establish the conditions under which controlled information and items can be transmitted to anyone outside the United States and to foreign persons and entities in the United States. They also restrict or prohibit the transaction of business with certain countries, persons and entities that have been sanctioned by federal agencies as a threat to U.S. interests. All Texas A&M employees and students must be aware of and are responsible for the export control implications of their work and must ensure that their activities conform to export control laws and regulations. There are severe institutional and individual penalties for violations of export control laws and regulations, including the loss of research funding, loss of export privileges and/or criminal and civil penalties.

## VISITING SCHOLARS

Texas A&M often hosts visitors who come to collaborate on research and scholarly topics of mutual interests or to work on specific research to be conducted within university research and/or clinical facilities. These visiting scholars are not employees of the university. Through the appropriate approval process, they can be allowed access to university facilities and resources and issued a UIN and NetID that will allow them to obtain an official Texas A&M email address, visitor identification card and/or library card. All individuals assigned under a visiting scholar title are subject to and are required to observe all applicable

federal, state, and local laws, including, but not limited to, export control laws and regulations, and requirements of Texas A&M rules and regulations including intellectual property rights and obligations.

## FOREIGN INFLUENCE IN RESEARCH

There is growing concern among federal agencies regarding certain agreements and activities between U.S.-based researchers and various foreign universities and institutions. The existence of such agreements and/or activities may have a negative impact on federal funding decisions for individual researchers. Of utmost concern are the cases where researchers are not disclosing these relationships and activities to their home institution or to U.S. federal sponsors of their work, potentially violating the requirements of either or both. Funding agencies have made the following clear: investigators and their universities must completely disclose all foreign activities to their sponsors. The term "foreign influence" has not been officially defined by the federal government. However, various government agencies have identified foreign activities that require disclosure. These include, but are not limited to, foreign funding of sponsored research; foreign employment; use of unfunded (in-kind) resources from foreign sources, including equipment, staff, or laboratory/office space; participation in foreign talent programs; foreign sponsored travel; international collaborations; and other funded or unfunded services such as accepting any titled academic, professional, or institutional position such as honorary, visiting, or adjunct faculty positions.



## INTERNATIONAL SHIPPING

Anyone shipping internationally is responsible for complying with all export control laws and regulations. Knowing the proper export control classification and authorization is imperative to complying with the federal regulations. The Research Security and Export Controls Office (RESEC) is here to support you if you need to export an item(s) to facilitate your research. All items will be controlled for export to a U.S. embargoed or sanctioned country. If you have questions or concerns, please contact the RESEC Office.

## INTERNATIONAL TRAVEL

Individuals traveling internationally on university business or with university property are responsible for complying with export control laws and regulations which may restrict or prohibit some travel related activities/destinations, and require licenses for other activities. The RESEC Office can help with these assessments to ensure institutional and individual compliance with export control requirements.

