

15.02.99.S1 Export Control Program Management

Approved: [August 28, 2024](#)

Next Scheduled Review: August 28, 2029



Rule Summary

The Texas A&M University System (System) is committed to upholding the highest standard of ethical conduct and compliance with its legal obligations, including federal statutes and regulations implementing U.S. export control policies. Required by System Policy 15.02, *Export Control Program Management*, this rule provides the System Office's framework for assessing and mitigating risk associated with export controls compliance.

Rule

1. RESPONSIBILITIES

- 1.1 This rule applies to all System Offices employees and business operations, who must conduct activities in the course and scope of their employment in accordance with all applicable U.S. export control laws and regulations, System policies and regulations, and this rule. Export control compliance and identification of potential associated risks should be viewed as an important component of employee day-to-day responsibilities.
- 1.2 In addition to broader export control program management activities associated with member compliance offices, the System Research Security Office (RSO) administers System Offices export controls compliance procedures.

2. EMPOWERED OFFICIAL

- 2.1 The Vice Chancellor for Research is the System Offices Empowered Official (EO). The System Offices EO serves as the primary representative and point of contact for all System export control-related activities. Specifically, the System Offices EO is responsible for any registration, license, commodity jurisdiction, advisory opinion, commodity classification, or voluntary disclosure activities required for compliance with export control laws and regulations.
- 2.2 In certain circumstances such as license applications, advisory opinion requests, commodity classifications, or commodity jurisdiction requests, the System Offices EO may delegate these responsibilities to an appropriate designee within the RSO.

3. EXPORT CONTROL COMPLIANCE PROGRAM

- 3.1 The *System Offices Export Controls Compliance Guidance Manual* details specific procedures for mitigating the System Office's export control-related risks. The intent of this guidance manual is basic educational content; the guidance manual must not be represented or construed as legal advice, and it must not be relied upon exclusively. All questions must be directed to the System RSO.
- 3.2 In accordance with System Policy 15.02, the System RSO will conduct an annual risk assessment documenting the System Office's export control risk portfolio.

4. VIOLATIONS

- 4.1 Known or suspected export control violations may be reported to the System Offices EO, or via the [EthicsPoint Hotline](#).
- 4.2 The System Offices EO is authorized to investigate any known or suspected export control violations. Accordingly, the System Offices EO is also authorized to suspend or terminate activities if it is determined such activity is not in compliance with export control laws and regulations.

Related Statutes, Policies, or Requirements

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

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

[Office of Foreign Assets Control \(OFAC\) 31 CFR 500-598](#)

[National Security Decision Directive 189](#)

[Atomic Energy Act of 1954 and Nuclear Regulatory Commission Regulations to 10 CFR Part 110](#)

[System Policy 15.02, *Export Control Program Management*](#)

[System *Export Controls Compliance Guidance Manual*](#)

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