



TEXAS TECH™

Operating Policy and Procedure

OP 75.04: Global Engagement

DATE: July 30, 2025

PURPOSE: This Operating Policy/Procedure (OP) establishes institutional procedures for managing global engagement, including international travel and hosting foreign visitors in connection with research, scholarly, and educational activities at Texas Tech University (TTU). The policy aims to identify and mitigate risks associated with international engagements, ensuring compliance with federal and state laws.

REVIEW: This OP will be reviewed every two years after publication by the Director of Export and Security Compliance, the Senior Associate Vice President for Research Operations, and the Vice Provost for International Affairs. Substantive revisions will be submitted to the Vice President for Research & Innovation and the Provost and Senior Vice President.

POLICY/PROCEDURE

1. Scope

- a. This policy applies to all TTU faculty, staff, students, postdoctoral researchers, visiting scholars, and affiliated personnel who engage in international travel for institutional purposes or who host foreign visitors on campus for research, educational, or professional collaboration. Covered activities include, but are not limited to, conference attendance, field research, joint projects, facility tours, and short- or long-term academic appointments.
- b. For the purpose of this policy, a “foreign visitor” is defined as any individual who is not a U.S. citizen or lawful permanent resident and who is (1) physically present on TTU property for academic, research, collaborative, educational, or professional purposes; or (2) participating virtually in TTU-sponsored activities in which unpublished research, export-controlled information, proprietary data, or other sensitive topics will be discussed. This includes, but is not limited to:
 - (1) Individuals sponsored by TTU under U.S. visa programs (e.g., J-1, H-1B, O-1, B-1);
 - (2) Individuals present under non-TTU-sponsored visa arrangements but engaged with TTU-hosted programs or personnel; and
 - (3) Foreign nationals participating in short-term visits, facility tours, seminars, or meetings, regardless of visa status. The term excludes TTU-enrolled international students participating solely in their academic curriculum unless otherwise engaged in the types of activities described above.

The term excludes routine virtual attendance at publicly accessible lectures, academic courses, or open webinars, unless such participation includes access to sensitive information or affiliations triggering export control or research security concerns. TTU-enrolled international students are not considered foreign visitors under this policy when participating solely in their academic curriculum. Additionally, restricted and/or sensitive information refers to content subject to federal controls, covered by nondisclosure or proprietary agreements, or designated as sensitive under a Technology Control Plan (TCP). This does not include routine academic instruction, general attendance at open seminars, or typical scholarly presentations of unpublished research unless other elevated risk factors are present, including foreign adversary affiliations and covered technologies.

2. International Travel Requirements

- a. All university-affiliated international travel by faculty, staff, students, administrators, or postdoctoral researchers for business, research, or academic purposes must be registered through TTU's International Travel Application (ITA) system in accordance with [OP 79.05, International Travel](#). Registration must be completed and approved prior to departure. The traveler must provide information on the trip's purpose, sponsoring institution or collaborator, intended destination(s), and whether research data, equipment, or controlled technology will be transported.
- b. Travel to high-risk destinations—including countries designated as “foreign adversaries” under EO GA-48 or those subject to the Office of Foreign Assets Control (OFAC) or the Bureau of Industry and Security (BIS) restrictions—requires additional review by the Office of Export and Security Compliance (OESC). Travelers to these destinations may be required to complete pre-departure security briefings, carry secure “loaner” devices, and limit their access to sensitive data while abroad. All OESC travel reviews are conducted through official travel request pre-approval submissions via TTU's [Procurement-Travel Services](#).
- c. If the traveler intends to carry controlled data, proprietary research, export-controlled materials, or specialized software, OESC will conduct an export review. Depending on the findings, a TCP or export license may be required before departure. Travelers are responsible for complying with any limitations or conditions imposed as a result of this review.
- d. Within ten business days of returning from travel to a high-risk country, travelers must submit a post-travel report (see Attachment D) summarizing meetings, research collaborations, and any unusual events (e.g., equipment searches, data requests, or suspicious activity).
- e. International travel that is not registered and approved through the ITA system may result in denial of reimbursement, lack of travel insurance coverage, or findings of noncompliance with federal and state security requirements.

3. Foreign Visitor Procedures

- a. Departments planning to host foreign visitors must notify OESC in advance of the visit. Hosts can submit visitor pre-screening requests at the [OESC website's home page](#) or reach out directly to exports.vpr@ttu.edu. Required information includes the visitor's name, home institution, country of citizenship, purpose of visit, access needs (e.g., labs or offices), and anticipated duration of stay.

- b. For virtual participation, screening is generally not required unless the foreign participant will access TTU-hosted virtual environments where unpublished research, export-controlled topics, or other sensitive materials will be discussed. OESC retains discretion to require screening based on affiliation risk or content sensitivity.
- c. OESC will conduct restricted party screening and assess institutional risk based on the visitor's affiliations, funding sources, and research areas. Once a visit is approved, the hosting department must ensure that the visitor completes and signs the Foreign Visitor Invitation and Agreement Form (Attachment A). This form outlines TTU's expectations regarding permissible activities, access limitations, and compliance with U.S. export control and research security laws. A signed copy must be retained by the hosting department and submitted to OESC prior to the visit. Visitors must also sign an attestation certifying that they are not affiliated with Malign Foreign Talent Recruitment Programs (see Attachment B). If the visitor has a high-risk affiliation (e.g., with a Section 1286 institution or foreign adversary government), the visit may be subject to institutional conditions or review and approval by the TTU Research Security Review Board.
- d. The host department is responsible for ensuring visitors comply with all imposed restrictions, such as supervised access, facility escorts, or limitations on data and equipment exposure (see Attachment C).
- e. Virtual access restrictions (e.g., limited document sharing or access to research platforms) may also be imposed, where appropriate.

4. Roles and Responsibilities

- a. Travelers and hosting departments must initiate early communication with OESC when planning international travel or foreign visits. They are expected to cooperate fully with pre-travel screenings, export control assessments, and institutional security requirements.
- b. OESC conducts risk assessments, provides guidance on export requirements, issues TCPs or travel conditions when needed, and vets foreign visitors. OESC also maintains institutional records of high-risk travel and visitor engagements.
- c. The TTU Research Security Review Board serves as the institutional escalation authority for international travel or visitor requests that pose elevated or ambiguous research security risks. The board may approve, deny, or conditionally authorize the activity.

5. Enforcement and Compliance

Noncompliance with this policy may result in denied travel approvals, revocation of visitor access, suspension of research privileges, or referral to federal or state enforcement bodies. TTU reserves the right to restrict international activities that pose unacceptable security or compliance risks.

6. General Prohibitions

- a. TTU employees are prohibited from participating in Malign Foreign Talent Recruitment Programs. Any TTU employee who receives solicitations to participate in Malign Foreign Talent Recruitment Programs must notify the OESC.

- b. TTU employees are prohibited from accepting gifts or traveling to a Country of Concern for professional purposes. TTU employees must report to the OESC any activities where employees are approached by groups representing a Country of Concern that offer gifts or travel. Additionally, all employees must report personal travel to Countries of Concern as provided in Texas Tech University [System Regulation 07.16](#).

7. References and Resources

- OP 75.01: Administration and Implementation of the Research Security Program
- Export Administration Regulations (EAR)
- International Traffic in Arms Regulations (ITAR)
- Office of Foreign Assets Control (OFAC) Sanctions
- Texas Executive Order GA-48
- Texas House Bill 127
- NDAA Sections 1286, 1260H
- NSPM-33 and CHIPS and Science Act

[Attachment A: Foreign Visitor Invitation and Agreement Form](#)

[Attachment B: Attestation for Non-Participation in Malign Foreign Talent Recruitment Programs](#)

[Attachment C: Hosting Department Onboarding and Offboarding Checklist](#)

[Attachment D: Post-Travel Report](#) (required for high-risk countries)