

# Research Security Updates and Huron Tips

*November 12, 2025*

*Research Security and Export Controls  
Division of Research*



# Brief History and Timeline

- August 2018: NIH Director Dr. Frances Collins letter
  - Laid the groundwork for discussions on research security
  - Dr. Collins sent a letter to over 100 research institutions regarding researchers participating in internationally based research and/or academic outside activities that had not been disclosed
  - Concerns that this undisclosed support was the source of intellectual property diversion away from the US
  - Term “**foreign influence**” was used to define this concern
- December 2019: JASON Report
  - JASON advisory group is an elite group of scientists that advise the US Government on matters of science and technology
  - Report further clarified the risks created where there is a lack of disclosure, specifically in the context of Intellectual Property theft and Research Security
  - Include “**Conflict of Commitment**” under the Research Security Umbrella
- January 2021: National Security Presidential Memo – 33 (NSPM-33)
  - Mandated the establishment of research security programs to protect against foreign government interference and exploitation at research institutions receiving federal funds in excess of \$50M per year
- January 2022: Guidance for Implementing NSPM-33
- August 2022: CHIPS and Science Act of 2022
  - Includes Research Security Requirements
- March 2024: JASON Report
  - At NSF’s request to comment on specific steps NSF might take to identify sensitive areas of research and describe processes to address security in those areas
- July 2024: Office of Science & Technology
  - Posted guidelines that confirmed the 4 mandatory program elements required for a compliant research security program

# National Security Presidential Memorandum 33 (NSPM-33)

## Guidance for Implementing NSPM-33 on National Security Strategy for United States Government-Supported Research and Development – January 2022

- Strengthen protections of U.S. Government-supported R&D against foreign government interference and misappropriation, while maintaining an open environment to foster research discoveries and innovation that benefit the United States and the world.
- Outlined commitments in the following areas:
  - Engaging regularly with the research community and other stakeholders to share information
  - Standardizing disclosure information to assess potential conflicts of interest and conflicts of commitment
  - Coordinating agency policy development for researcher digital persistent identifiers
  - **Developing research security program standards**
- Specifically regarding research security programs, NSPM-33 directs research institutions receiving more than \$50M in Federal science and engineering support in the prior 2 fiscal years to **establish a research security program that includes 4 elements:**
  1. **Cybersecurity**
  2. **Foreign Travel Security/Training**
  3. **Research Security Training**
  4. **Export Control Training**

# Research Security Training Requirements

- Research security training is listed as one of four elements of a Research Security Program required by NSPM-33, issued on Jan. 14, 2021, to safeguard our research ecosystem.
- The "CHIPS and Science Act of 2022," Section 10634, codifies the requirement for research security training for federal research award personnel in public law.
- As of now, this will likely be an annual requirement.



# Research Security Training

## Federal Sponsor Requirements

- **Department of Energy (DOE): Required for Proposals Submitted on or after May 1, 2025**
  - Covered Individuals: any principal investigator (PI); project director (PD); co-principal investigator (Co-PI); co-project director (Co-PD); project manager; and any individual regardless of title that is functionally performing as a PI, PD, Co-PI, Co-PD, or project manager, as well as anyone designated by DOE.
- **National Science Foundation (NSF): Required for Proposals Submitted on or after October 10, 2025**
  - Within 12 months PRIOR to an application submission, each individual identified as a senior/key personnel by the **proposer** must complete research security training
- **National Institutes of Health (NIH): Required for Proposals Submitted on or after January 25, 2026** [RESCINDED]
  - But, if you have a RPPR or JIT information due after October 1, 2025, you must complete the training and certify to that effect.
- **USDA-NIFA, DOD, NASA, and other Sponsors will have requirements out soon**



# DoD Risk Matrix

## May 9, 2025

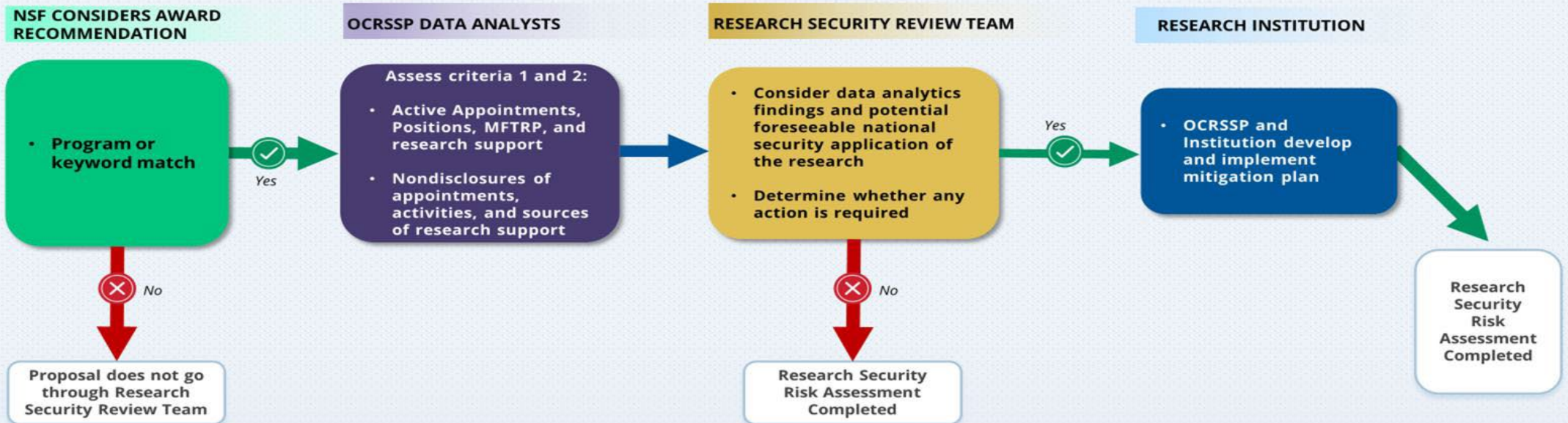
	Factor 1: Foreign Talent Recruitment Programs	Factor 2: Funding Sources	Factor 3: Patents	Factor 4: Entity Lists
Prohibited factors	Indicator(s) <sup>1</sup> of active participation <sup>2</sup> in a malign foreign talent recruitment program (MFTRP).	None	None	For FY 2025: <sup>3</sup>  Collaborations for the specific purpose of fundamental research <sup>4</sup> between institutions of higher education and academic institutions that are included in the most recently updated list developed pursuant to section 1286 of the NDAA for FY 2019, as amended, or employees of such institutions. <sup>5</sup>
Factors discouraged by DoD policy, mitigation measures required, rejection of proposal required if no mitigation possible	None	Indicator(s) that the covered individual is currently receiving funding from a Foreign Country of Concern (FCOC) or an FCOC-connected entity.	Patent application(s) or patent(s) not disclosed in proposal, that resulted from research funded by the U.S. Government (USG), that were filed in an FCOC prior to filing in the United States or filed on behalf of an FCOC-connected entity.	For the period after Aug 9, 2022: <sup>6</sup>  Indicator(s) of affiliation with an entity on the version at the time of review of the U.S. Bureau of Industry and Security (BIS) Entity List, <sup>7</sup> the Annex of Executive Order (EO) 14032 <sup>8</sup> or superseding EOs, section 1260H of the NDAA for FY 2021, <sup>9</sup> or section 1286 of the NDAA for FY 2019, as amended.
Mitigation measures expected	For the period between Oct 10, 2019 <sup>10</sup> and Aug 9, 2024:  Indicator(s) of participation in an MFTRP meeting any of the criteria in section 10638(4)(A) of the CHIPS and Science Act of 2022.	For the period after Oct 10, 2019:  Indicator(s) that the covered individual received funding from an FCOC or an FCOC-connected entity.	Patent application(s) or patent(s) disclosed in proposal resulting from research funded by the USG that were filed in an FCOC, or on behalf of an FCOC-connected entity, prior to filing in the United States.	For the period between Oct 10, 2019 and Aug 9, 2022:  Indicator(s) of affiliation with an entity on the current version of the U.S. BIS Entity List, the Annex of EO 14032 or superseding EOs, section 1260H of the NDAA for FY 2021, or section 1286 of the NDAA for FY 2019, as amended.
Mitigation measures suggested	For the period after Oct 10, 2019:  Covered individual's co-author(s) <sup>11</sup> on publications in scientific and engineering (S&E) journals are participants in an MFTRP meeting any of the criteria in section 10638(4)(A) of the CHIPS and Science Act of 2022.  For the period of 10 years prior to Oct 10, 2019:  Indicator(s) of participation in an MFTRP meeting any of the criteria in section 10638(4)(A) of the CHIPS and Science Act of 2022.	For the period of 10 years prior to Oct 10, 2019:  Indicator(s) that the covered individual received limited or partial funding from an FCOC or an FCOC-connected entity.	Patent application(s) or patent(s) not disclosed in fundamental research project proposal that resulted from research funded by the USG that were filed in a non-FCOC, or on behalf of an entity in a non-FCOC, prior to filing in the United States.  or  Co-patent(s) application(s) with a person on the U.S. BIS Denied Persons List. <sup>12</sup>  or  Co-patent(s) applications(s) with an individual affiliated with any entity on the U.S. BIS Entity List, the Annex of EO 14032 or superseding EOs, section 1260H of the NDAA for	For the period of 10 years prior to Oct 10, 2019:  Indicator(s) of affiliation with an entity on the current version of the U.S. BIS Entity List, the Annex of EO 14032 or superseding EOs, section 1260H of the NDAA for FY 2021, or section 1286 of the NDAA for FY 2019, as amended.  For the period after Oct 10, 2019:  Covered individual's co-author(s) on publications in S&E journals are affiliated with an entity on the U.S. BIS Entity List, the Annex of EO 14032 or superseding EOs, section 1260H of the NDAA for FY 2021, or section 1286 of the NDAA for FY 2019, as amended.  Covered individual is a co-author on a publication in an S&E journal with a person(s) on the U.S. BIS Denied Persons List.

## DOD Risk Matrix (cont.)

			FY 2021, or section 1286 of the NDAA for FY 2019, as amended.	
No mitigation needed	No indicator(s) of participation in an MFTRP meeting any of the criteria in section 10638(4)(A) of the CHIPS and Science Act of 2022.	No indicator(s) that the covered individual is receiving, or has received, funding from an FCOC or an FCOC-connected entity.	All patent applications or patents resulting from research funded by the USG have been filed in the United States prior to filing in any other country.	<p>No indicator(s) of any affiliation with an entity on the U.S. BIS Entity List, the Annex of EO 14032, or superseding EOs; section 1260H of the NDAA for FY 2021; or section 1286 of the NDAA for FY 2019, as amended.</p> <p>No indicator(s) that a covered individual's co-author(s) on publications in S&amp;E journals are affiliated with an entity on the U.S. BIS Entity List; the Annex of EO 14032 or superseding EOs; section 1260H of the NDAA for FY 2021; or section 1286 of the NDAA for FY 2019, as amended; and no indicator(s) that the covered individual is a co-author on a publication in an S&amp;E journal with a person(s) on the U.S. BIS Denied Persons List.</p>

# NSF Risk Review Process

## TRUST Process



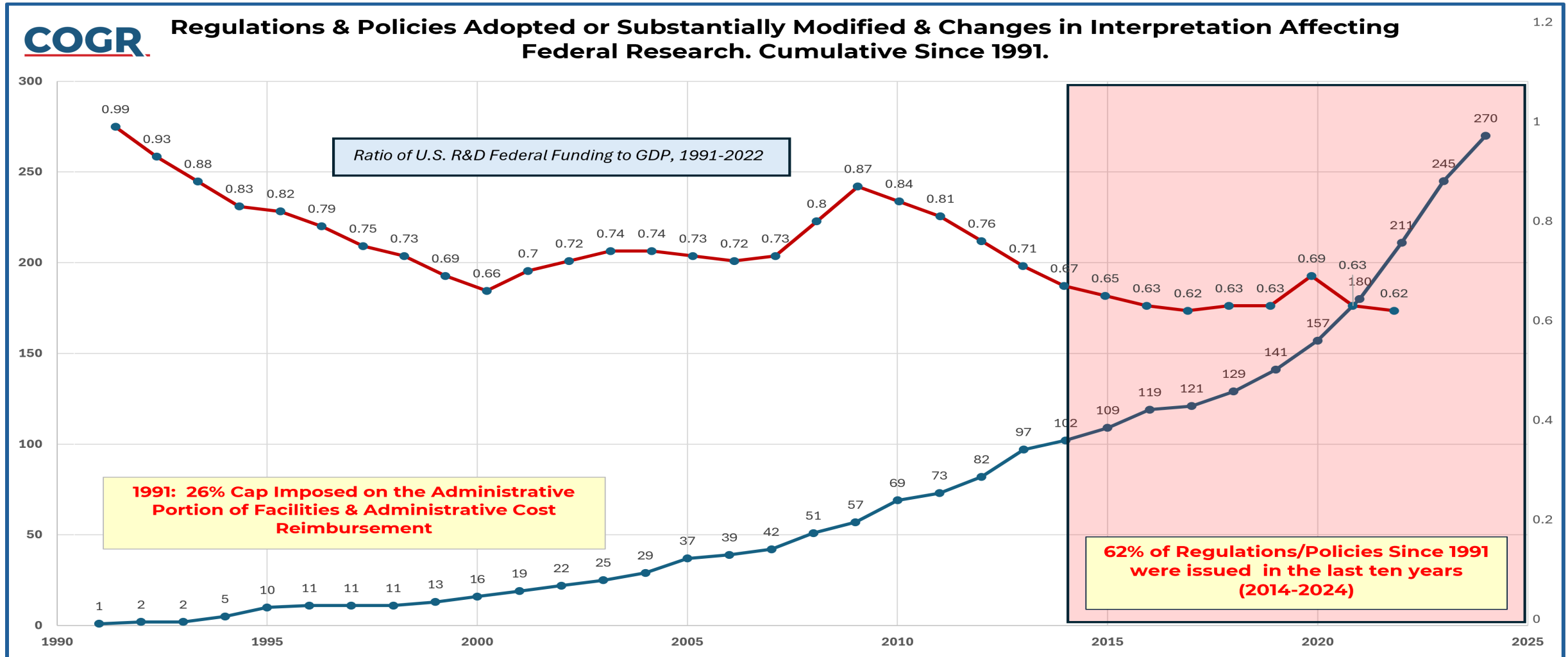


# Risk Matrices

## Summary Comparison Chart

Agency	Risk Factor 1	Risk Factor 2	Risk Factor 3	Risk Factor 4	Co-authorship a factor?	How far back are they looking?
DoD (Including DARPA)	Foreign Talent Recruitment Program participation	Funding from Foreign Country of Concern	Patent applications of patents filed outside the U.S., particularly in a Foreign Country of Concern	Association or affiliation with entities on Entity List	Yes	Some factors from October 10, 2019 (Griffin letter); others from August 9, 2022 (CHIPS Act)
US Army	Foreign Talent Recruitment Program participation	Affiliated with Denied Entities	Funding from strategic competitors	Affiliation, association, or collaboration with strategic competitors	Yes	Not specified
DOE	Foreign Talent Recruitment Program participation - foreign funding sources and certain convening behaviors associated with patenting	Foreign ownership or control, criminal or regulatory issues, the supply change for any sensitive equipment/supplies, and ties to entities on specified lists	Risk Factors tied to Date of Activity or Relationship	Technology Considerations - emerging or critical technologies	Possibly (not stated in policy but verbally stated on several occasions that they "may" look at co-authors)	Unclear, but likely 2019; they have verbally mentioned potentially 10 years back
NIH	Foreign Talent Recruitment Program participation	Undisclosed foreign funding, particularly from a Foreign Country of Concern	Undisclosed affiliations with foreign institutions or entities, particularly with a Foreign Country of Concern	N/A	No, if not directly related to NIH-funded work	5 years
NSF (Quantum proposals only)	Active appointments with positions with or research support from U.S. proscribed parties and any party to a MFTRP	Non-disclosures of appointments, activities, and sources of research support	Potential foreseeable national security applications of the research	N/A	No	Undisclosed information will be examined from January 2022 (NSPM-33 Implementation Guidance)

# Administrative Burden Has Increased Dramatically



# System Regulation 15.05.04 High Risk Global Engagements and High Risk International Collaborations

- New regulation effective August 18, 2022; University rule April 6, 2023
  - *Recently updated November 4, 2025 to account for GA-48 and HB 127*
- What is a High Risk Global Engagement?
  - Contracts with one or more Foreign Persons based outside the United States in a Country of Concern
  - Includes contracts that require participation with Foreign Persons based in a Country of Concern
- What is a High Risk International Collaboration?
  - Relationships and activities with Foreign Persons based outside the United States in a Country of Concern as described in Section 238(d)(1) of the Servicemember Quality of Life Improvement and National Defense Authorization Act for Fiscal Year 2025 (Public Law 118-159). This includes gifts from entities associated with a Country of Concern. Sec. 238(d) Definitions:
    - (1) The term ``collaboration" means coordinated activity between an institution of higher education and a covered entity and includes--
      - (A) sharing of research facilities, resources, or data;
      - (B) sharing of technical know-how;
      - (C) any financial or in-kind contribution intended to produce a research product;
      - (D) sponsorship or facilitation of research fellowships, visas, or residence permits;
      - (E) joint ventures, partnerships, or other formalized agreements for the purpose of conducting research or sharing resources, data, or technology;
      - (F) inclusion of researchers as consultants, advisors, or members of advisory or review boards; and
      - (G) such other activities as may be determined by the Secretary of Defense.
- Currently, what are the Countries of Concern?
  - China (includes Hong Kong and Macau), Russia, Iran, North Korea, Cuba, and Venezuelan politician Nicolás Maduro (Maduro Regime)
- What does this mean?
  - High risk global engagements and high risk international collaborations require additional reviews and approvals, including final approval from the Texas A&M System Vice Chancellor for Research.

# Texas Governor's Executive Order GA-48

## House Bill 127

- GA-48 effective November 19, 2024
  - Hardening of state government to protect national security
- HB 127 effective September 1, 2025
  - Established measures to protect Tier 1 research institutions in Texas from the threat of foreign espionage and IP theft; increases penalties
  - Established the Higher Education Research Security Council (HERSC)
- Key Elements:
  1. Certification that vendors are not listed on various prohibited vendor lists
  2. **No personnel can accept gifts or travel to (for professional purposes) a country on the foreign adversaries list**
    - **HB 127: risk based approach**
  3. Applicants must attest they are not connected to a country on the foreign adversaries list
  4. **Employees must provide notification of personal travel to a foreign adversary nation prior to travel and a post-travel brief outlining details of the trip**
  5. Ensuring personnel that have access to critical infrastructure can maintain security and do not have criminal history or connections to foreign adversaries
  6. The reporting of foreign gift and contract disclosures to the THECB
  7. **Prohibition of faculty and employees taking part in recruitment programs from foreign adversary nations**

# How many requests have been approved?

- **FY 25**
  - 156 of 193 requests approved (*2 pending*)
- **FY 26 (as of November 10, 2025)**
  - 85 of 97 requests approved (*23 pending*)



# How do I request 15.05.04 approval?

- 1) For activities related to sponsored awards, pre-approval begins in Maestro.
- 2) For activities related to travel, pre-approval begins in Emburse.
- 3) For all other activities, pre-approval requests begins in Huron, with a Pre-Approval Request form.

# Huron

Huron is a disclosure system that is utilized to centralize Financial Conflicts of Interest Disclosures (previously in Maestro), Conflict of Commitment Disclosures, and Faculty Consulting/External Employment approval requests (previously hard copies).

- Improve compliance with current disclosure and approval routing processes
- Improve and streamline the approval routing process by establishing logical workflow for review based on review types and content
- Support institutional needs for a consistent approval process and provide metrics for the use of the programs, to support continued success of the institutional partners
- Increase institutional and individual compliance with federal, state, and university rules and regulations

# Website Information

<https://research.tamu.edu/research-compliance/conflict-of-interest/>

<https://research.tamu.edu/research-compliance/high-risk-international-activity/international-collaborations-and-other-international-activities-involving-countries-of-concern/>

<https://research.tamu.edu/research-compliance/conflict-of-interest/disclosure-process-in-huron/>

coi@tamu.edu

979-862-6419



# CONFLICT OF INTEREST AND COMMITMENT

A conflict of interest or commitment is created when personal, financial, or outside interests have the potential to unduly influence the design, conduct, or reporting of research or interfere with the performance of institutional responsibilities. The Huron Research Suite is utilized by Texas A&M to provide an avenue for documentation of financial interests and outside activities which might raise concerns about conflicts of interest and commitment. Within that system, all Texas A&M employees are required to complete an annual Disclosure Profile and submit Pre-Approval Requests when needed.

**HURON INSTRUCTIONS AND GUIDANCE**

**ACTIVITIES TO BE DISCLOSED →**

[Home](#) | [Research Compliance](#) | [Conflict of Interest and Commitment](#)

## Financial Conflict of Interest

Pursuant to the Texas A&M System Regulation [15.01.03 Financial Conflicts of Interest in Sponsored Research](#), and [University Rule 15.01.03.M1](#), Texas A&M has the responsibility to identify and manage and reduce or eliminate conflicts of interest that may arise due to financial or other personal interests of the investigator. The project director or principal investigator and any other person, regardless of job title or position, who is responsible for the design, conduct, or reporting of research or research activities is required to complete a disclosure in [Huron](#). [Please see Huron instructions and guidance documents here](#). Disclosures are required:

- within 30 days of initial employment,
- prior to the submission of an application for funding,
- at least annually, and
- within 30 days of acquisition of a new activity requiring disclosure.

In addition, all investigators who are responsible for designing, conducting, or reporting on research or research activities must also complete training on financial conflicts of interest. Employees will receive automatic notifications with a link to the training. The training is currently available through the A&M System's [Single Sign On](#) system (TrainTraq Course 2111716), and is required every 4 years.



FINANCIAL CONFLICT OF INTEREST

**Frequently Asked Questions**



TEXAS A&M UNIVERSITY  
Division of Research

[About](#) [Funding](#) [Proposal Support](#) [Awards & Projects](#) [Research Compliance](#) [Research Support](#) [Units](#)

## INTERNATIONAL ACTIVITIES INVOLVING COUNTRIES OF CONCERN

Texas A&M embraces a culture of excellence which values diversity in thought and an environment that promotes innovation and creativity in research. As a global leader, the university acknowledges the importance of collaborations, locally as well as around the world, to advance society.



[Home](#) | [Research Compliance](#) | [International Activity](#) | [International Activities Involving Countries of Concern](#)

### COUNTRIES OF CONCERN

Defined by Texas A&M System Research Security Office (RSO) quarterly, and are currently:

🌐 **China**

*includes Hong Kong and Macau*

🌐 **Cuba**

🌐 **Russia**

🌐 **Iran**

🌐 **North Korea**

🌐 **Venezuelan politician Nicolás Maduro**

*Maduro Regime*

[READ THE REGULATION](#)

Universities such as Texas A&M are actively responding to concerns from federal agencies and sponsors regarding foreign influence in academic research. This influence may range from conflicting commitments of researchers to foreign entities to the misappropriation of research results and intellectual property. While we value and encourage international collaborations that promote openness in research and scholarship, Texas A&M must comply with US laws and agency regulations that govern how we manage and report international engagements. This includes National Security Presidential Memorandum 33 (NSPM-33) that requires all federal research funding agencies to strengthen and standardize disclosure requirements and mandates the establishment of research security programs at research institutions that receive federal funds. Understanding the regulatory environment, the risks, and importance of transparency is an individual responsibility as well as an organizational commitment.

We have provided [a list that includes entities located in the Countries of Concern that employees will not be allowed to have collaborations](#) and that will be denied. Entities included on this list are subject to at least one US government restricted list and is subject to change at any time.



### Pre-Approval Requests

High risk activities often require Pre-Approval Requests.

» [Approved Activities to be Disclosed](#)

» [Disclosure Process in Huron](#)

» [Risk Based List](#)

## Frequently Asked Questions

Texas A&M remains committed to the highest level of research integrity and engagement of global partners. The below FAQs are intended to address questions related to the above policies.





TEXAS A&M UNIVERSITY  
Division of Research

[About](#) [Funding](#) [Proposal Support](#) [Awards & Projects](#) [Research Compliance](#) [Research Support](#) [Units](#)

# DISCLOSURE PROCESS IN HURON

Huron Research Suite is a disclosure system that is used to centralize Financial Conflicts of Interest disclosures (previously in Maestro), Conflict of Commitment disclosures and Faculty Consulting/External Employment approval requests.

HURON RESEARCH SUITE

ACTIVITIES TO BE DISCLOSED →

🏠 [Home](#) | [Research Compliance](#) | [Conflict of Interest and Commitment](#) | [Disclosure Process in Huron](#)

← [Back to Conflict of Interest and Commitment](#)

Disclosure Process in Huron
FAQ

## Huron Features

Huron has two distinct features, the Pre-Approval Request (PAR) and the Disclosure Profile (DP).

### Pre-Approval Request (PAR)

The pre-approval request allows you to request approval to participate in activities that fall under System Regulations 31.05.01 Faculty Consulting and/or External Professional Employment and 31.05.02 External Employment.

### Disclosure Profile (DP)

The Disclosure Profile is the focal point of the Huron system for the discloser. It provides a summary of a discloser's interests and other outside activities.



## ACTIVITIES INVOLVING COUNTRIES CONSIDERED HIGH-RISK

Per Texas A&M University System regulation 15.05.04, Huron houses approval requests for activities that involve countries that are considered high-risk.

» [Learn more about International Activities Involving Countries of Concern](#)

## User Guides

Below you will find guidance on completing required actions within Huron.

### [Add Huron to SSO Menu](#) »

PDF

Have quick and easy access to the Huron Research Suite by adding the link to your SSO menu.

### [Submit a Pre-Approval Request](#) »

PDF

A pre-approval request allows you to submit a request to participate in outside activities (such as board service, outside academic appointment, expert witness, foreign collaborations, etc.), which is then reviewed by the appropriate individuals before making a determination.

### [Respond to Clarifications Requested](#) »

PDF

This user guide provides instructions on how to respond to clarifications requested by a reviewer in Huron.

### [Pin Disclosure Profile](#) »

PDF

Have quick and easy access to your disclosure profile by pinning it to your dashboard in the Huron Research Suite.

### [Create a Copy of an Existing Pre-Approval Request](#) »

PDF

This user guide will help you create a copy of an existing PAR if you continue to engage in the same activity and you are going to submit a request for the next fiscal year.

### [Review a Pre-Approval Request](#) »

PDF

Pre-approval requests are electronically routed for review and approval by the appropriate reviewers. Based on the details of the pre-approval request submitted, the

# Pre-Approval Requests - PARs

A **Pre-Approval Request (PAR)** is submitted in relation to desired participation in an outside activity. Huron facilitates routing and review, and then the requestor is notified of the final determination.

A PAR is proactive in nature. You should create a request in the Huron system AND receive approval *before* you begin to participate in the activities.

We use Huron to meet the requirements of the following System Regulations:

- **15.05.04 – High-Risk Global Engagements and High-Risk International Collaborations**
- **31.05.01 - Faculty Consulting and External Professional Employment**
- **31.05.02 - External Employment**

# Common Types of Pre-Approval Requests

- **High-Risk Global Engagements and High-Risk International Collaborations**
  - China, Hong Kong, Macau, North Korea, Cuba, Iran, Venezuelan politician Nicolás Maduro (Maduro Regime) and Russia
- **Activities / Roles common to 31.05.01**
  - External Appointments / Titles
  - Board Service
  - External Agreements / Projects
  - Consulting
  - Some Proposal Reviewer Roles
  - Expert Witness Services
  - Some Academic and Professional Services
  - Paid Foreign Talent Recruitment Programs
  - Some Stock and Equity Ownership

# Your Workspace

From the **Disclosure Profile** workspace, click Edit Disclosure Profile.

Dashboard COI

Disclosures Requests Certifications Plans Triggering Events Reports

COI > Disclosures > Disclosure Profile (your name here)

**Action Required**

Disclosure profile last completed:  
10/27/2021

**i Your training has expired**

**Request Pre-Approval**

☒ Complete Disclosure Profile Update

Assign Proxy

**Disclosure Profile for** (your name here)

**Action Required**

Review disclosure information in the disclosure profile. When all disclosure information is reviewed, click on the Complete Disclosure Profile Update button.

Review disclosure information in the disclosure profile. When all disclosure information is reviewed, click on the Complete Disclosure Profile Update button.

**Edit Disclosure Profile**

Disclosures Pre-Approval Requests FCOI Training History

# Submitting a Pre-Approval Request

## Creating New: Pre-Approval Request

### 1. Requestor:

### 2. \* Request name/title: ?

### 3. \* Type of request: ?

Name	Description
<input type="radio"/> Outside Academic Appointment	Academic and/or research appointments at an entity other than the institution (e.g. adjunct facu
<input type="radio"/> Other Appointment	Non-teaching appointments at an entity other than the University (e.g., honorary appointments,
<input type="radio"/> Assuming Management or Fiduciary Responsibilities (other than Board Service)	Assuming an executive or management position for a third party entity (e.g. President, Chief Sc
<input type="radio"/> Board Service	Service on the Board of Trustees for an outside nonprofit or for profit organization
<input type="radio"/> Expert Witness	Serving as a witness or reviewing documents for a legal matter
<input type="radio"/> Consulting Activity and other Professional Services	Pursuant to 31.05.01 Faculty Consulting and/or External Professional Employment, Provision o
<input type="radio"/> Scientific Advisory Board	Provision of scientific expertise to outside entity (e.g., pharmaceutical or device manufacturer)
<input type="radio"/> Providing Continuing Education	Presenting or creating educational material for continuing education programs (e.g., seminars, ,
<input type="radio"/> Foreign Talent Program Participation	Participation in a talent program sponsored by a foreign government or organization
<input type="radio"/> External Employment	<p>Pursuant to 31.05.02 External Employment, Employment with an outside entity other than the a</p> <p>individual, self-employment, or employment by an entity in which the faculty member is a princ</p> <p>disclosed to any agency of the U.S. government, as well as communication of any information s</p> <p>In addition, the provision of certain types of scholarly or research expertise to foreign entities wi</p>
<input type="radio"/> High Risk Engagement/Collaboration	High Risk Engagement/Collaboration Disclosure Type Description: External activities (other tha


[Clear](#)

### 4. \* Is your employment at Texas A&M University sponsored under a nonimmigrant benefit (i.e. H1-B, O-1, E-3, TN)?

☐ Yes ☐ No [Clear](#)



# Submitting a Pre-Approval Request

 **TEXAS A&M**  
UNIVERSITY

☰

Validate

Compare

<<

Request Information

Activity Information

Submit Request

Editing: EXE00004616

External Employment Information

1. \* Entity: ?

or

If you cannot find the entity in the above list, enter the details here: ?

[None]

2. \*\* Describe the scope of work, and nature of relationship with external employer: ?

3. \* Start date: (Must fall within the current fiscal year; no earlier than 9/1) ?


4. \* End date: (Must fall within the current fiscal year; no later than 8/31) ?

5. \* Provide the estimated time that will be spent on this activity (days): ?


# Adding a Write-In Entity

## Add Write-In Entity

1. \* Entity name:

2. \* Is this entity publicly traded? 

☐ Yes ☐ No [Clear](#)

3. \* Is this a foreign entity? 

☐ Yes ☐ No [Clear](#)

4. Please provide the full address of the external entity (including city, state, and country).

a. Address

b. \* City

c. State/Province (State and Province)

d. Postal Code

e. \* Country

# Submitting a Pre-Approval Request



≡ Validate Compare <<

Request Information

Activity Information

**Submit Request**

Editing: EXE00004616

## Submit Pre-Approval Request

Click the Submit button to submit your request for pre-approval.

Submit

# Submitting a Pre-Approval Request

## Submit

For Faculty Consulting and/or External Professional Employment that falls under System Regulation 31.05.01, Faculty Consulting and/or External Professional Employment, I certify the following:

**INTELLECTUAL PROPERTY NOTICE:** System Regulation 31.05.01, *Faculty Consulting and/or External Professional Employment*, provides that a faculty member will not enter into any faculty consulting and/or external professional employment agreement that grants third-party rights to intellectual property conceived, reduced to practice or developed: a) with system or member-administered funds and/or with significant use of system resources; b) after the conclusion of the agreement; or c) outside the agreement's technical scope.

I request permission to accept faculty consulting and/or external professional employment. The proposed employment will not interfere with my assigned duties. I will ensure that my assigned duties arising during periods of approved release time will be performed by me or another individual authorized by the member. In such faculty consulting and/or external professional employment, I will act as an individual and not as a representative of The Texas A&M University System.

I agree to furnish reports and additional details of employment as required.

I have read System Policies 07.01, *Ethics*, and 31.05, *External Employment and Expert Witness*, and System Regulation 31.05.01, *Faculty Consulting and/or External Professional Employment*, and agree to conduct my faculty consulting and/or external professional employment in accordance with these policies and this regulation. I feel that my value as a faculty member and my own professional status will be enhanced and improved by the proposed faculty consulting and/or external professional employment.

I certify that:

- Any potential or actual conflict of interest between this faculty consulting and/or external professional employment and my responsibilities as an employee of The Texas A&M University System will be promptly disclosed and managed, reduced or eliminated in accordance with applicable federal or state law, system policies or regulations and/or the member's rules and procedures
- This faculty consulting and/or external professional employment will be conducted at no expense to The Texas A&M University System except as authorized by A&M System policies and regulations
- All activities performed in connection with the faculty consulting and/or external professional employment will be conducted in accordance with the highest ethical standards of my profession
- If applicable, all required disclosures have been made to the sponsors of my research projects and proposals
- This proposed faculty consulting and/or external professional employment complies with the provisions of the intellectual property notice stated above.

For External Employment that falls under System Regulation 31.05.02 External Employment, I certify the following:

I understand that external employment may not be undertaken on that portion of time covered by federal grants or contracts. I further understand that this request applies only to that portion of my time for which I am employed by The Texas A&M University System. I agree to furnish reports and additional details of employment as required.

I certify that there will be no conflict of interest between this external employment and my responsibilities as an employee of The Texas A&M University System. I also certify that this external employment will be conducted at no expense to The Texas A&M University System.

I fully agree and understand that official release time is contingent upon this activity being of value to The Texas A&M University System and an enhancement to my relationship thereto, and so long as I receive no remuneration for the work performed. Otherwise, I will take vacation or accumulated compensatory time for such absences, as applicable.

I certify that I have read System Policies 07.01, *Ethics*, and 31.05, *External Employment and Expert Witness*, and System Regulation 31.05.02, *External Employment*, and agree to conduct my external employment in accordance with the provisions contained therein, including the requirement that I will not engage in external employment prior to receiving the requisite approvals.

If I am a faculty member, I certify that all external employment requested will not be directly related to my professional discipline.

OK

Cancel

# Submitting a Pre-Approval Request

Under Review

**Date created:**

7/28/2025 8:24 AM

**Date submitted:**

7/28/2025

## Next Steps

[View Pre-Approval Request](#)

[Add Comment](#)

[Copy Request](#)

## EXE00004616: Tennis Instructor - McKaley Izaguirre

**Request type:** External Employment

**Assigned reviewer:**

**Current review stage:** Supervisor Review

**Review stage:** 1 of 3

**Discloser:**

**Discloser's employer:**





# Marking Complete

3. Approved requests:

Request	Request Type	Entity	Foreign Entity?	Start Date	End Date	Approval Date	Review Group	Applied to Disclosures
	Consulting Activity and other Professional Services		Yes	12/17/2023	12/22/2023	2/13/2024	Texas A&M University	

 Requests marked as completed will be removed from this listing when a profile update is completed.

# PAR Takeaways

- PRE-Approval is the key! These should be submitted PRIOR to the activity.
- You can only select one activity in a Pre-Approval Request (PAR).
  - If you have more than one activity for which you need to request permission, you will need to submit a separate pre-approval request.
- PARs are approved by fiscal year (9/1 – 8/31). If you plan to participate in the activity past 8/31 of the current fiscal year, you can use the copy function to submit an “extension” for the previously approved activity.
  - The window for requests to be submitted into the next fiscal year opens on June 1<sup>st</sup>.
- If your PAR is for an activity that falls under System Regulation 15.05.04, please anticipate that the review will take some time and submit the PAR as early as possible.
- **Important!** You can continue to edit the pre-approval request (using the **Edit Pre-Approval Request** button) until you **Submit** the disclosure for review. If any changes are needed after that, our team can return it for clarifications, as needed. If you overlook submitting the PAR, it will remain in the **Pre-Submission** state and will not be reviewed.
- Keep in mind that when the activity is discontinued, you can mark the activity as complete on your Disclosure Profile.

**Questions?**