



MEMORANDUM

To: Faculty and Staff
From: Karen Royal, Director of Compliance
Date: September 18, 2017
Subject: Export Controls Compliance Program—Phase Implementation
Phase 7 – International Students and Student Activities

Summary: All Foreign Nationals from embargoed or sanctioned countries seeking admission to Texas A&M University—Kingsville (TAMUK) will be subject to Restricted Party Screenings (RPS) prior to admission. Study abroad activities and programs will be screened for compliance with export control laws and regulations. To mitigate export control violation risks associated with students engaged in international activities and programs, RPS will be performed by Export Control Delegates as needed.

Detail: As previously indicated, implementation of the TAMUK Export Controls Compliance Program will be completed in phases. Phase 7, International Students and Student Activities, is outlined in Sections 7.0 and 9.0 of the TAMUK Export Controls Compliance Program Manual.

International Student Admissions: Admission applications received from citizens of embargoed countries including, but not limited to, Iran, Cuba, Syria, Sudan, or North Korea, will be subject to RPS prior to admission. An assigned Export Controls Delegate will conduct screenings on applications received, and the results will be added to the applicant's file. If there is a match resulting from the applicant's screening, the TAMUK Office of Compliance will conduct a secondary screening.

Students Engaged in International Activities & Programs: The TAMUK Office of International Studies & Programs is responsible for developing and implementing internal operating procedures to ensure TAMUK study abroad activities and programs are screened for compliance with export control laws and regulations, and will coordinate with the Office of Compliance to do so. In the case of TAMUK students' international travel, it is the responsibility of the university activity organizer to seek and obtain appropriate export control approvals from the Office of Compliance for activities including, but not limited to, the following: execution of agreements performable outside the United States; non-credit bearing travel; and making payments to Foreign Persons or vendors. All Foreign Persons enrolled in a TAMUK credit bearing program abroad or participating in a TAMUK non-credit bearing program, activity, or field trip abroad, who have not previously attended TAMUK and are not enrolled as continuing students at a college or university based in the United States, will undergo RPS prior to participation in the Study Abroad program or in the non-credit bearing program, activity, or field trip as soon as reasonably possible once identified. The International Studies & Programs assigned delegates will be responsible for completing RPS for Foreign Persons involved in TAMUK student international travel.

References:

- *Export Controls Compliance Program Manual*
http://www.tamuk.edu/compliance/TAMUK-Export_Controls_Manual.pdf
- *List of Export Control Delegates*
http://www.tamuk.edu/compliance/Visual_Compliance_Delegate_List.pdf
- *Forms and Resources*
<http://www.tamuk.edu/compliance/export-controls.html#formsandresources>

For further Export Controls assistance, please direct questions to the Office of Compliance at ExportControls@tamuk.edu.

Thank you,

Karen B. Royal, J.D., CCEP
Director of Compliance
Texas A&M University-Kingsville