

I. POLICY STATEMENT

Texas Southern University (the “University”) is committed to protecting the integrity, security, and transparency of its research enterprise, academic operations, and institutional assets against unauthorized foreign influence and other risks associated with foreign adversaries. To fulfill this commitment and ensure compliance with state law, the University shall comply with House Bill 127, enacted by the 89th Texas Legislature, including Texas Education Code Chapter 51B (Higher Education Research and Protection) and Texas Education Code § 51.957 (Higher Education Research Security Council), as well as Texas Education Code § 51.956 (Policy Framework for Research Security) and all other applicable state and federal requirements.

The University shall establish and maintain institutional processes necessary to screen, review, approve, monitor, report, investigate, and certify activities subject to applicable law. These processes shall apply across all institutional operations and activities falling within the scope of applicable law, with appropriate records maintained to demonstrate compliance with statutory requirements and mandatory certification obligations.

II. SCOPE AND ADMINISTRATIVE AUTHORITY

A. Scope

This policy applies to all executive officers, administrative officers, faculty, staff, researchers, post-doctoral fellows, research fellows, visiting scholars, student employees, registered student organizations, contractors, and individuals acting on behalf of the University. To the extent applicable, this policy governs institutional operations and activities falling within the scope of Texas Education Code Chapter 51B, Texas Education Code §§ 51.956 and 51.957, and other applicable state or federal law.

B. Administrative Authority

Executive divisions, operational departments, and designated research security officials are authorized to establish standard operating procedures, internal controls, screening protocols, and administrative guidelines necessary to implement this policy, provided such measures are consistent with this policy and applicable law.

C. Applicability

This policy shall be interpreted and administered consistent with applicable federal and state law, including applicable executive orders of the Governor of Texas. Where a provision of this policy conflicts with applicable law, applicable law shall control.

III. DEFINITIONS

For purposes of this policy, the following definitions apply.

Academic Partnership. A written statement of mutual interest in cultural exchange or academic or research collaboration, or a faculty or student exchange program, study abroad program,

matriculation program, recruiting program, or dual degree program, as defined by Texas Education Code § 51B.101.

Coordinating Board. The Texas Higher Education Coordinating Board.

Council. The Higher Education Research Security Council established under Texas Education Code § 51.957.

Foreign Adversary. Has the meaning assigned by Texas Education Code § 51B.001.

Foreign Government. Has the meaning assigned by Texas Education Code § 51B.001.

Foreign Source. Has the meaning assigned by Texas Education Code § 51B.001.

Gift. Has the meaning assigned by Texas Education Code § 51B.001.

Research Security Office. The office established by the University's chief administrative officer under Texas Education Code § 51B.153.

Research Security Officer. The University official designated pursuant to the research security policy framework required by Texas Education Code § 51.956 to perform the research security responsibilities required by applicable law and University policy.

Student Organization. Has the meaning assigned by Texas Education Code § 51.9315 and incorporated by Texas Education Code § 51B.101.

IV. RESEARCH SECURITY PROGRAM

The University shall maintain a Research Security Program to implement applicable state and federal research security requirements. The Program shall be administered through the Research Security Officer and Research Security Office and shall include the screening, review, verification, monitoring, reporting, and other research security functions established by this policy.

A. Research Security Officer

The Board of Regents shall maintain a research security policy framework that designates the University's Research Security Officer in accordance with Texas Education Code § 51.956. The Research Security Officer designated under Section 51.956 serves as the University's member of the Higher Education Research Security Council in accordance with Texas Education Code § 51.957(c)(3).

The Research Security Officer shall oversee implementation of the University's Research Security Program, coordinate research security activities across applicable University divisions and operational areas, and perform the duties assigned by applicable law, this policy, and related University policies and procedures.

If the Research Security Officer is unable to serve or the position becomes vacant, the University shall ensure that the designation required by Texas Education Code § 51.956 is maintained in accordance with applicable law and Board authority.

B. Research Security Office

The Chief Administrative Officer shall establish the University's Research Security Office in accordance with Texas Education Code § 51B.153.

The Research Security Office shall review materials submitted in connection with research security screening, take reasonable steps to verify the information submitted, and take any other action the Office considers appropriate in accordance with applicable law and University policy. The University may direct the Research Security Office to approve persons for hire using a risk-based determination that considers the nature of the research and the person's background and ongoing affiliations.

Detailed screening, verification, review, escalation, documentation, and approval processes shall be established through Research Security Office standard operating procedures.

V. GIFTS FROM FOREIGN SOURCES OF FOREIGN ADVERSARIES

A. Employee Gift Prohibition

A University employee may not accept a gift that the employee knows is directly or indirectly offered from a foreign source of a foreign adversary unless the gift is of de minimis value, as determined by Coordinating Board rule in consultation with the Higher Education Research Security Council.

An employee who is offered a prohibited gift shall report the offer to Human Resources. Human Resources shall coordinate with the Research Security Office to review the report and take appropriate action in accordance with applicable law and University policy.

The employee gift prohibition, reporting requirements, and related employee training requirements are also set forth in MAPP 02.05.05, Ethics and Conflicts of Interest.

B. Gifts from Individual Citizens of Foreign Adversaries

The University may accept a gift exceeding de minimis value from an individual citizen of a foreign adversary only after conducting the vetting required by Texas Education Code § 51B.051(c) and in accordance with applicable standards and best practices established by the Higher Education Research Security Council and rules adopted by the Coordinating Board.

A qualifying gift valued at more than \$25,000 shall require approval by the President and shall be disclosed to the Higher Education Research Security Council as required by law.

C. Foreign Gift and Contract Reporting

Section 117 of the Higher Education Act of 1965 requires an institution of higher education receiving federal financial assistance to report gifts received from and contracts entered into with a foreign source when the value, considered alone or in combination with all other gifts from or contracts with the same foreign source within a calendar year, is \$250,000 or more. Section 117 also requires reporting when an institution is owned or controlled by a foreign source.

If the University meets the reporting criteria under Section 117, the University shall submit the required disclosure report to the United States Department of Education semiannually. Reports covering January 1 through June 30 shall be submitted by July 31, and reports covering July 1 through December 31 shall be submitted by January 31 of the following year. The University shall submit the same reporting to the Texas Higher Education Coordinating Board at the same time the reporting is required to be submitted to the United States Department of Education, pursuant to Texas Education Code § 51B.051(e).

VI. INTERNATIONAL ACADEMIC PARTNERSHIPS

A. Prohibited Academic Partnerships

The University shall not participate in an academic partnership with a foreign source of a foreign adversary, or an entity controlled by a foreign adversary, that:

1. constrains the University's freedom of contract;
2. allows the University's curriculum or values to be directed, controlled, or influenced by the foreign adversary; or
3. promotes an agenda detrimental to the safety or security of the State of Texas, its residents, or the United States.

B. Review of Academic Partnerships

Prior to entering into an academic partnership with a foreign source of a foreign adversary, the proposed partnership shall be submitted to the Research Security Office for review and submission to the Higher Education Research Security Council as required by Texas Education Code § 51B.102. Information that is confidential or proprietary shall be omitted from the information shared with the Council as permitted by law.

The Research Security Office shall maintain and disseminate any review procedures, standards, or best practices established by the Higher Education Research Security Council for covered academic partnerships and shall coordinate the University's annual certification to the Council regarding compliance or noncompliance with the Council's best practices, as required by Texas Education Code § 51B.102.

Nothing in this section supersedes or replaces the University's existing requirements for contract review, approval, or execution, including applicable review by the Office of General Counsel.

VII. STUDENT ORGANIZATIONS

A. Gift and Financial Support Prohibition

A registered student organization may not:

1. accept a gift from a foreign adversary or an agent of a foreign adversary; or
2. enter into a contract or agreement with a foreign adversary or an agent of a foreign adversary under which the student organization receives financial support.

This prohibition does not prohibit a registered student organization from accepting member dues or fees.

B. Annual Certification

Each registered student organization shall annually certify to the University that it has not accepted a gift from a foreign adversary or an agent of a foreign adversary and has not entered into a contract or agreement with a foreign adversary or an agent of a foreign adversary under which the student organization receives financial support.

The Division of Student Affairs shall administer the Student Organization Certification of Compliance, maintain completed certifications, and provide copies to the Research Security Office and Office of General Counsel.

C. Consequences for Noncompliance

If the University determines that a student organization has violated this section, the University shall terminate the organization's recognition or registration, as applicable, and shall not provide any benefit to the organization, pursuant to Texas Education Code § 51B.103.

VIII. RESEARCHER SCREENING AND ACCESS

A. Screening Requirements

Before extending an offer of employment for a research or research-related support position, the department seeking to hire the applicant shall determine whether the applicant is subject to research security screening. Before granting access to research data or activities or other sensitive University data, the department or unit seeking to grant such access shall make the same determination.

Screening is required if the person:

1. is a citizen of a foreign country and is not a permanent resident of the United States; or
2. is affiliated with an institution or program, or has at least one year of employment or training, in a foreign adversary, other than employment or training by an agency of the United States.

The screening shall include a background check to determine whether the person has ties to a foreign adversary that would prevent the person from maintaining the security or integrity of the University, its research data or activities, or other sensitive University data. The applicable department or unit shall coordinate with Human Resources and the Research Security Office to complete the required screening. Tex. Educ. Code § 51B.151.

B. Screening Waivers and Additional Screening

The University shall apply any low-risk circumstances established by the Higher Education Research Security Council under Texas Education Code § 51B.151 for which otherwise required screening may be waived. The University may also screen persons in addition to those for whom screening is required by law and may waive screening for a person who possesses an active

United States government security clearance issued by a federal agency, as permitted by Texas Education Code § 51B.151.

C. Required Documentation and Review

A person subject to screening under Texas Education Code § 51B.151 shall provide the materials required by Texas Education Code § 51B.152, including, if the person is a citizen of a foreign country, a copy of the person's passport and the nonimmigrant visa application most recently submitted to the United States Department of State, together with any additional information determined by the Higher Education Research Security Council.

Human Resources shall coordinate collection of the required documentation and submission to the Research Security Office. The Research Security Office shall review the submitted materials, take reasonable steps to verify the information, and take any other action it considers appropriate. Tex. Educ. Code §§ 51B.152, 51B.153(a).

D. Employment and Access Restriction

A person subject to screening may not be hired for a research or research-related support position or granted access to research data or activities or other sensitive University data until the requirements of the screening process have been completed. Tex. Educ. Code § 51B.153(d).

E. Employment Prohibition for Nondisclosure

The University may not employ a person subject to screening in a research or research-related support position if the person fails to disclose a substantial educational, employment, or research-related activity, publication, or presentation, unless the applicable department head or the department head's designee certifies in writing the substance of the failure to disclose and the reasons for disregarding the failure.

A copy of the written certification shall be maintained in the investigative file of the Research Security Office. Tex. Educ. Code § 51B.153(e).

F. Reporting of Applicants Rejected Following Screening

If a person is rejected for employment based on the research security screening required by this section or other risk-based screening, the Research Security Office shall report the person's identity to any law enforcement agency designated by the Governor or the Board of Regents. Tex. Educ. Code § 51B.153(f).

IX. INTERNATIONAL TRAVEL AND FOREIGN ACTIVITIES

A. International Travel Approval and Monitoring Program

The University shall administer a risk-based international travel approval and monitoring program for employment-related foreign travel in accordance with Texas Education Code § 51B.201. The Office of Travel and Research Security Office shall coordinate the University's international travel review, approval, monitoring, documentation, and reporting processes, in consultation with other responsible University offices as appropriate.

B. Travel Review and Required Forms

Covered travelers shall complete and submit the applicable University international travel forms, including the International Personal Travel Pre-/Post-Trip Forms, and any other documentation required under applicable University travel and research security procedures.

The Office of Travel and Research Security Office shall coordinate review of the required forms and supporting information to identify applicable health, safety, security, research security, foreign adversary, and other risks associated with the proposed travel. Employment-related foreign travel requiring pre-approval under the University's risk-based process may not proceed until the required review and approval have been completed.

C. Traveler Acknowledgment and Compliance

As a condition of approval, covered travelers shall review and acknowledge applicable guidance concerning foreign adversaries and countries subject to state or federal sanctions or other restrictions and shall comply with applicable University restrictions, approval conditions, disclosure requirements, and state and federal law. Covered travelers shall comply with applicable University information security and network-access restrictions during foreign travel, including restrictions applicable to travel to a foreign adversary, as established by University information security policies and procedures.

D. Post-Travel Review

Covered travelers shall complete the applicable post-travel documentation required by the University's international travel procedures. The Office of Travel and Research Security Office shall coordinate post-travel review as required and may obtain additional information or documentation concerning foreign activities, affiliations, payments, honoraria, reimbursed expenses, material changes in travel, or other matters necessary to satisfy applicable compliance requirements.

E. Foreign Adversary Travel Records

For employment-related foreign travel to and activities involving a foreign adversary by faculty members, researchers, and research department staff members, the University shall maintain the records required by Texas Education Code § 51B.202, including:

1. foreign travel requests and approvals;
2. expenses reimbursed by the University for travel, food, and lodging;
3. payments and honoraria received during the foreign travel and activities, including for travel, food, and lodging;
4. the stated purpose of the foreign travel; and
5. records relating to the foreign activity review.

F. Records Retention

Records required under Texas Education Code § 51B.202 shall be maintained for at least three years, or for any longer period required by applicable state or federal law.

G. Annual Board Report

The Office of Travel and Research Security Office shall coordinate the compilation of information necessary for the University's annual report to the Board of Regents required by Texas Education Code § 51B.202 regarding covered employment-related foreign travel to a foreign adversary. The report shall include each covered traveler, foreign location visited, foreign institution visited, and any other information required by applicable law.

H. Implementing Procedures and Forms

The Office of Travel and Research Security Office, in coordination with other responsible University offices as appropriate, may establish and maintain standard operating procedures, forms, workflows, risk assessment criteria, approval requirements, post-travel review procedures, and other administrative controls necessary to implement this section. Approved forms and procedures may be revised as necessary to remain consistent with applicable law and University requirements.

X. PROHIBITED EDUCATION SOFTWARE

A. Prohibited Contracts

The University shall not enter into or renew a contract to provide testing, tutoring, or other education software included on the prohibited list maintained under Texas Education Code § 51B.251. A contract subject to this section may not proceed if the proposed software or provider is included on the applicable prohibited list.

B. Screening and Contracting Controls

University Procurement and Information Technology, in coordination with Academic Affairs and other responsible University areas as appropriate, shall incorporate prohibited education software screening into applicable procurement and contract-renewal processes.

Before the University enters into or renews an applicable contract, the proposed education software and provider shall be screened against the prohibited list maintained pursuant to Texas Education Code § 51B.251. The review shall include vendor and affiliate information as necessary to determine whether the proposed transaction is prohibited.

The University shall maintain documentation sufficient to demonstrate completion of the required screening. Procurement system controls, vendor review procedures, renewal controls, checklists, certifications, or other administrative measures may be used to implement and document the screening process.

C. Coordination with Prohibited Technologies Requirements

The screening required by this section is separate from the prohibited technologies requirements administered pursuant to MAPP 04.06.32, Prohibited Technologies Security. MAPP 04.06.32 addresses covered applications and prohibited technologies identified by the Texas Department of Information Resources under Texas Government Code Chapter 620 and does not independently satisfy the screening requirement under Texas Education Code § 51B.251.

University Procurement and Information Technology shall ensure that applicable procurements and renewals are screened against both the Texas Department of Information Resources prohibited technologies list and the Texas Higher Education Coordinating Board prohibited education software list maintained pursuant to Texas Education Code § 51B.251.

D. Implementing Procedures

University Procurement and Information Technology, in coordination with Academic Affairs and other responsible University areas as appropriate, may establish standard operating procedures, screening protocols, forms, certifications, procurement controls, renewal review procedures, and other administrative measures necessary to implement this section.

XI. REPORTING AND INVESTIGATION

A. Reporting

The University shall maintain mechanisms for reporting conduct or activity potentially prohibited by Texas Education Code Chapter 51B or this policy.

1. An employee who is offered a gift or benefit prohibited by Texas Education Code § 51B.051 shall report the offer to Human Resources in accordance with MAPP 02.05.05, Ethics and Conflicts of Interest.
2. Complaints or reports involving research security, foreign adversary activities, researcher screening, foreign affiliations, or other matters within the responsibilities of the Research Security Office shall be reported to the Research Security Office.
3. Other complaints or reports of potential violations of Texas Education Code Chapter 51B or this policy shall be reported to the Office of Compliance, which shall coordinate referral to the appropriate University office as necessary.

B. Investigation

Complaints subject to Texas Education Code § 51B.052 shall be reviewed and investigated by the appropriate University office based on the nature of the alleged violation. The Office of Compliance, Research Security Office, Human Resources, Office of General Counsel, or other responsible University office shall coordinate as appropriate. If the University requests records from a person pursuant to Texas Education Code § 51B.052 based on reasonable suspicion that the person has violated Texas Education Code Chapter 51B, the person shall produce the requested records not later than the 10th business day after the date the person receives the

request, unless the University and the person agree to a later date, in accordance with Texas Education Code § 51B.052(b).

The University shall maintain procedures for complaint intake, review, investigation, preservation of evidence, findings, corrective action, and closure. The University may investigate additional matters within its lawful authority and take appropriate action based on the findings of an investigation.

XII. BOARD CERTIFICATION, LEGISLATIVE REPORTING, AND OVERSIGHT

A. Annual Board Certification

The University shall complete the annual institutional compliance review and obtain the certification required by Texas Education Code § 51B.301(a) in sufficient time for submission before the beginning of each state fiscal year on September 1. The certification shall address the Board of Regents' compliance with Chapter 51B during the preceding state fiscal year.

The Office of Compliance shall coordinate the annual institutional compliance review and certification process and shall collect, review, and compile the certifications, reports, records, and other documentation necessary to support the University's certification. The Research Security Office, Office of General Counsel, Academic Affairs, Student Affairs, Human Resources, Information Technology, Procurement, Office of Travel, Business and Finance, and other responsible University offices shall timely provide the Office of Compliance with information and documentation necessary to complete the review and certification process.

The Office of Compliance shall coordinate the timely presentation of the completed institutional compliance review and supporting documentation to the President for submission to the Board of Regents.

The President shall complete the applicable Chief Executive Officer certification required under the HB 127 compliance process, and the Board of Regents shall complete the governing board certification required by Texas Education Code § 51B.301(a). The Board's certification report shall be submitted to the Governor, Legislature, Texas Higher Education Coordinating Board, and Higher Education Research Security Council in accordance with applicable law and submission requirements.

Pursuant to Texas Education Code § 51B.301(a), an institution of higher education may not spend money appropriated to the institution for a state fiscal year until the governing board of the institution submits to the Governor, the Legislature, the Texas Higher Education Coordinating Board, and the Higher Education Research Security Council a report certifying the governing board's compliance with Texas Education Code Chapter 51B, Higher Education Research and Protection, during the preceding state fiscal year.

B. Legislative Testimony

During the interim between each regular session of the Texas Legislature, the Board of Regents or its designee shall testify before the standing legislative committees with primary jurisdiction

over higher education regarding the Board's compliance with Chapter 51B, as required by Texas Education Code § 51B.301(b).

XIII. COMPLIANCE, AUDIT, CORRECTIVE ACTION, AND RECORDS

A. Compliance Documentation

Each University office responsible for a requirement under this policy shall maintain documentation sufficient to demonstrate implementation and compliance with its applicable requirements. Documentation shall include, as applicable, approvals, certifications, screening records, reports, forms, reviews, determinations, and other records generated or maintained under this policy and its implementing procedures.

The Office of Compliance shall collect and review institutional compliance documentation necessary to support the annual certification process and other institution-wide compliance reviews. At the conclusion of each spring academic semester, the Office of Compliance shall submit its findings and supporting documentation to the President and the Office of General Counsel to provide sufficient time for administrative review and implementation of any recommended actions. Following administrative review, the Administration shall submit the University's institutional compliance determination and supporting documentation to the Board of Regents in support of the Board's statutory certification required by Texas Education Code § 51B.301(a).

B. Audit Readiness

Responsible University offices shall timely provide or make available requested documentation and shall cooperate with the State Auditor, Texas Higher Education Coordinating Board, Higher Education Research Security Council, Internal Audit, Office of General Counsel, Research Security Office, and other authorized entities in connection with compliance reviews and audits. The State Auditor shall periodically conduct a compliance audit of the University under a schedule that ensures the University is audited at least once every four years, consistent with Texas Education Code § 51B.301(c).

C. Findings and Corrective Action

A University office that identifies a material compliance deficiency under this policy shall promptly communicate the matter to the appropriate responsible University officials and the Office of Compliance and shall take or recommend appropriate corrective action. Matters requiring legal interpretation or advice shall be coordinated with the Office of General Counsel.

If a State Auditor determination requires corrective action under Texas Education Code § 51B.301(d), the University shall develop and implement an appropriate corrective action plan and cure the violation within the statutory 180-day period. The President or designee shall coordinate corrective action with the responsible University offices and the Board of Regents, as

appropriate. If the University fails to cure the violation within that period, the University is ineligible to receive formula funding increases, institutional enhancements, or exceptional items during the state fiscal biennium immediately following the biennium in which the determination is made, consistent with Texas Education Code § 51B.301(d)(2).

D. Records Retention

Records created or maintained under this policy shall be retained in accordance with applicable state and federal law, the University's records retention requirements, and any specific retention period established by Chapter 51B.

Where Chapter 51B establishes a specific minimum retention period, the applicable records shall be retained for no less than that period or for any longer period required by applicable state or federal law or University records retention requirements. Nothing in this section shortens a longer retention period otherwise applicable to a University record.

XIV. IMPLEMENTING PROCEDURES

University divisions, departments, responsible officials, and other University personnel, as applicable, may establish written standard operating procedures, forms, workflows, checklists, approval processes, risk assessment criteria, training requirements, and administrative controls necessary to implement this policy. Responsibilities for implementation may be assigned or further defined through such procedures consistent with applicable law and University authority.

Implementing procedures shall be consistent with Texas Education Code Chapter 51B, applicable rules and Higher Education Research Security Council standards, this policy, and other applicable University policies.

XV. COMPLIANCE

Failure to comply with this policy may result in corrective or disciplinary action in accordance with applicable University policy and law and may subject the University or affected individuals or organizations to consequences prescribed by Texas Education Code Chapter 51B or other applicable law.

Nothing in this policy limits any additional compliance, reporting, investigative, or corrective authority available to the University under applicable law or University policy.

XVI. REFERENCES

1. Texas Education Code § 51.956, Policy Framework for Research Security.
2. Texas Education Code § 51.957, Higher Education Research Security Council.
3. Texas Education Code Chapter 51B, Higher Education Research and Protection.
4. House Bill 127, 89th Texas Legislature, Regular Session (2025).
5. Texas Education Code § 51.9315, Student Organizations.
6. Section 117, Higher Education Act of 1965, as amended.



7. Applicable Texas Higher Education Coordinating Board rules and guidance.
8. Applicable Higher Education Research Security Council standards and best practices.
9. MAPP 02.05.05, Ethics and Conflicts of Interest.
10. MAPP 04.06.32, Prohibited Technologies Security