
LAMAR UNIVERSITY
MANUAL OF ADMINISTRATIVE POLICIES AND PROCEDURES

SECTION: University

AREA: General

Transactions Involving Foreign Adversary Countries

I. PURPOSE

- A. Lamar University implements this policy to safeguard State information resources, U.S.-developed technologies, and critical infrastructure against intellectual property theft and other uses adverse to U.S. national security by foreign adversary countries or governments.

II. SCOPE

- A. This policy applies to all Lamar University employees.

III. DEFINITIONS

- A. **Foreign Adversary.** A foreign adversary is a country or government on the U.S. Department of Commerce's foreign adversaries list under 15 C.F.R. § 791.4. As of the effective date of this policy, foreign adversaries include the People's Republic of China, including the Hong Kong Special Administrative Region (China); the Republic of Cuba (Cuba); the Islamic Republic of Iran (Iran); the Democratic People's Republic of Korea (North Korea); the Russian Federation (Russia); and Venezuelan politician Nicolás Maduro (Maduro Regime).
- B. **Critical Infrastructure.** Critical infrastructure means a communication infrastructure system, cybersecurity system, electric grid, hazardous waste treatment system, or water treatment facility.
- C. **Critical Infrastructure Employee.** A critical infrastructure employee is University personnel, or similarly situated contractors, who research, work on, or have access to critical infrastructure as part of their work for Lamar University.

IV. CRITICAL INFRASTRUCTURE EMPLOYEES AND CONTRACTORS

- A. The ability to maintain the security or integrity of critical infrastructure is an essential job function for employees and similarly situated contractors who research, work on, or access critical infrastructure as part of their work for Lamar University.
- B. Administrative staff who meet the definition of a critical infrastructure employee will have this designation reflected in their job description.

- C. Faculty and research staff, including student employees, who meet the definition of a critical infrastructure employee must disclose their critical infrastructure activities to Lamar University's Office of Research and Sponsored Programs Administration (ORSPA) upon initiation of the research or activity involving critical infrastructure and at least annually thereafter.
- D. Critical infrastructure employees and contractors and applicants for such positions are subject to routine reviews to determine whether associations with foreign adversary governments, criminal history, or other conflicts of interest may compromise their ability to maintain the security or integrity of the critical infrastructure.

V. PROHIBITION ON GIFTS, CONTRACTS, AND PARTICIPATION IN FOREIGN TALENT RECRUITMENT PROGRAMS

- A. Lamar University employees are prohibited from accepting any gift, regardless of value, from an entity associated with a foreign adversary country or government. Gifts include, but are not limited to, grants or funds provided for research or travel.
- B. No Lamar University employee may enter into a contract, contract extension, or contract renewal for goods or services on behalf of the University with a person or entity
 - a. Listed in Section 889 of the 2019 National Defense Authorization Act (NDAA); or
 - b. Listed in Section 1260H of the 2021 NDAA; or
 - c. Owned by the government of a country on the U.S. Department of Commerce's foreign adversaries list under 15 C.F.R. § 791.4; or
 - d. Controlled by any governing or regulatory body located in a country on the U.S. Department of Commerce's foreign adversaries list under 15 C.F.R. § 791.4.

Note. Any exception to this prohibition must be authorized by Lamar University's Chief Financial Officer (CFO) consistent with the exceptions set forth in Executive Order GA-48 (Nov. 19, 2024).

- C. Lamar University employees are prohibited from taking part in talent recruitment programs sponsored by a foreign adversary country (e.g., China's Thousand Talents Program).
- D. Any person may report being approached by groups representing foreign adversary countries or governments that offer gifts or travel or a suspected violation of this policy by a Lamar University employee to the Texas State University System Hotline.

VI. PROHIBITION ON PROFESSIONAL TRAVEL TO FOREIGN ADVERSARY COUNTRIES

- A. Lamar University employees are prohibited from traveling to foreign adversary countries for professional purposes.

VII. PERSONAL TRAVEL TO FOREIGN ADVERSARY COUNTRIES

- A. Employees traveling to foreign adversary countries for personal reasons must submit a Foreign Travel Disclosure Form to Lamar University's Travel Office at least ten (10) days prior to their departure.

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- B. Employees returning from travel to a foreign adversary country must complete the return portion of the Foreign Travel Disclosure Form within ten (10) days of returning to work.
- C. Employees may not bring University-issued devices, non-public University information in any form, or personal devices containing University information, including devices containing passwords or access to University information resources, to a foreign adversary country.
- D. Employees may not log into or access any Lamar University information resources while traveling in a foreign adversary country.
- E. Employees may not provide access to non-public University information, including research conducted at or sponsored by Lamar University or other U.S.-based entities, to any person or entity while traveling in a foreign adversary country.
- F. Employees must immediately report to Lamar University any intentional or inadvertent disclosure of non-public University information or sensitive or proprietary technologies associated with the employee's work for Lamar University, to a person or entity associated with a foreign adversary country or government.

VIII. REVIEW AND RESPONSIBILITY

Review Schedule: Every three years on or before the date the policy was last revised and/or approved.

Responsible Parties: Chief Financial Officer
Associate Vice President for Human Resources

IX. APPROVAL

Marsha Worthy	04/29/2025
Associate Vice President for Human Resources	Date
Mary Wickland	04/29/2025
Chief Financial Officer	Date
Jaime R. Taylor	04/29/2025
Lamar University President	Date

POLICY LOG

Version	Date	Description of Changes
1	04/28/2025	Policy draft completed.
	04/29/2025	Policy approved by President.
	05/09/2025	Non-substantive change: in Section V.D., replaced “EthicsPoint” with “the Texas State University System Hotline.” EthicsPoint is no longer used by Lamar University. Change requested by the Office of Internal Audit - Lamar Components.