

 Wharton County Junior College	ADMINISTRATIVE PROCEDURE MANUAL		
WCJC Title: Prohibition on Engagement with Foreign Adversaries		Section D: Personnel	Page(s): 2
BASED ON BOARD OF TRUSTEES POLICY			
Policy Title: Ethics		Policy: DH	
Subtitle: Prohibition on Engagement with Foreign Adversaries		Date Adopted: 06/01/2025	

Purpose

In compliance with Executive Order GA-48, this procedure establishes a prohibition on employee engagement with foreign adversaries, as defined under 15 CFR §791.4.

Procedure

Gifts and Professional Travel Provided by Foreign Adversary

Employees of the College are prohibited from:

- Accepting any gift, regardless of value, from any individual, organization, or entity affiliated with or representing a foreign adversary nation, as defined under 15 CFR §791.4.
- Participating in any professional travel to a country listed as a foreign adversary under 15 CFR §791.4, including travel sponsored by or coordinated through organizations associated with such countries.

Employees must report any attempts by individuals or groups affiliated with foreign adversary nations to offer gifts, incentives, or travel opportunities. Reports should be submitted directly to the Office of Human Resources using the designated “Gift/Travel Disclosure Form”.

The college will maintain and process all disclosures and will report any gift/travel offers from foreign adversaries to state or federal authorities, as required by Executive Order GA-48.

Participation in Foreign Recruitment Programs

To safeguard institutional integrity and comply with Executive Order GA-48, the College strictly prohibits faculty and staff from participating in any foreign recruitment programs operated, sponsored, or otherwise affiliated with foreign adversary nations as defined by 15 CFR §791.4.

Foreign recruitment programs include, but are not limited to, formal or informal talent recruitment, research collaboration, or financial incentive programs coordinated by or on behalf of foreign adversary governments.

Employees of the College are prohibited from:

- Apply for, accept, or participate in foreign recruitment programs associated with foreign adversaries.
- Enter into agreements, contracts, or research partnerships that are part of or funded by such programs.
- Fail to disclose any prior or current involvement with these programs to the institution.

All faculty and staff must report any solicitation to join or collaborate with such programs to the Office of Human Resources or their immediate supervisor. The College will investigate all reported instances and take appropriate action.

Enforcement

Violations of this policy may result in disciplinary action, up to and including termination of employment, and may be reported to external authorities as required by state or federal law.

Date Prepared: 05/21/2025 (A3)