The University of Texas Rio Grande Valley

THE FIRST TEXAS UNIVERSITY FORMED IN THE 21ST CENTURY





Restricted Party Screening using Visual Compliance

September 2020

Restricted Party Screening



- Various U.S. government agencies maintain lists of individuals, companies, and organizations (foreign and domestic), whose U.S. export privileges have been blocked, restricted or revoked.
- Referred to as a: "prohibited party," "specially designated national," "denied party," "restricted party," etc.
- Per the regulations, UTRGV may not engage in any transaction with a restricted party.
- Restricted Party Screening (RPS) is a part of UTRGV's due diligence to ensure we are compliant with the regulations.





Restricted Party Screening



The more details you have, the less likely you are to run into false-positive 'hits'.

A 'hit' is a potential match.

A positive-match is when the result is 100% confirmed to be associated to the individual/entity screened.

Other details may be needed to resolve a 'hit,' such as: date of birth, middle name/initial, street address.







Descartes	Visual Compli	ance Resear	ch Edition					<u>Log Off</u>
	CCL/ECCN	ITAR/USML	Inventory	RPS	Regulations	Schedule B	Resources	<u>Home</u>





DESCARTES CustomsInfo

Classify import items up to 50% faster with Descartes CustomsInfo™ global trade content.





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Restricted Party Screening



Descartes Visual Compliance Research Edition	Log Off	
CCL/ECCN ITAR/USML Inventory R	RPS Regulations Schedule B Resources Home	
RESTRICTED PARTY SCREENING AUTHORITIES CONS	SULTED SANCTION PROGRAMS	
REGISTERED USER: David Sundvall, UNIVE	RSITY OF TEXAS STATE SYSTEM	
INDIVIDUAL AND COMPANY SCREENING BLOCKED FOREIGN NATIONALS BY COUNTRY		
Name:	Display a checklist of blocked foreign nationals in a country:	
Company:	Select country for checklist	
Address:	Fields to use for RPS	
City: State:	ncluding records having alternate country locations in Notes.	
Country: Select country if applicable V		
Comment 🗸	BLOCKED ENTITIES AND FUGITIVE LISTS	
Exact O Phonetic I Fuzzy Level 2 V	Display a checklist of entities on the selected government list:	
□ Stemming □ Thesaurus ☑ Field Specific	Select list to display V GO	
Remove business words	GEOGRAPHIC LOCATION FROM IP ADDRESS	
ECCN for country controls check: Select ECCN V	Helps focus results	
	May entail a margin of error. GO	
Export Sanctions GSA		
GSA data is updated in full every business day direct from SAM/EPLS.		
Business endings is not selectable when already set as your profile default. Fuzzy or phonetic search with thesaurus often produces erratic results.	RPS GSA Blocked IAEA Risk Changes Vessels Facilities Country	
	Changes Changes Vessels Facilities Country	



Restricted Party Screening Descartes Visual Compliance Research Edition

CCL/ECCN

ITAR/USML

<u>Inventory</u>

AUTHORITIES C

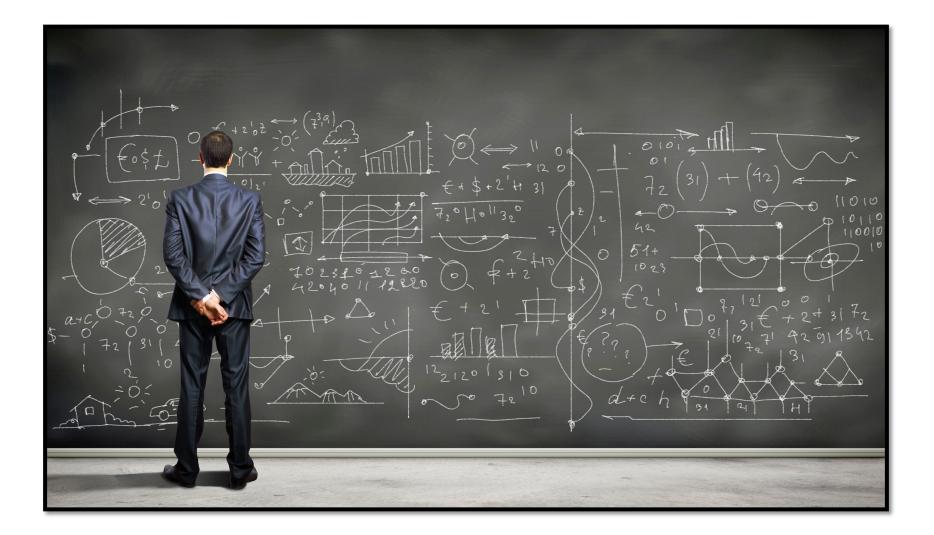
RESTRICTED PARTY SCREENING

REGISTERED USER: David Sundvall, UNI

	AND COMPANY SCREENING			
Name:	Insert name of individual; as it appears on passport			
Company:	Insert name of entity; do not use "DBA" in the field			
Address:	Use street address			
City:	State:			
Country:	Select country if applicableFor individuals, use 🗸			
Comment	citizenship Reason for RPS			

If you are screening an individual who is affiliated with an organization, conduct 2 separate screenings; one on the individual and one on the organization. It is not recommended that you conduct one screening with both the name of the individual and the organization.





Restricted Party Screening



RPS Example

INDIVIDUAL AND COMPANY SCREENING		
Name:	Research Edition	CCL/ECCN ITAR/USML Inventory RPS Regulation
Company: Australian Bureau of Meteorology		NO MATCHING RECORDS FOUND
Address: 700 Collins Street, Docklands		Your search of the Visual Compliance Restricted Party Screening database failed to return any records. Comment: Comment: TRAINING EXAMPLE
City: Melbourne $ earrow State: VIC earrow VIC earro$	Search criteria:	Name: n/a
Country: Australia		Company: Australian Bureau of Meteorology
		Address: 700 Collins Street, Docklands
Comment TRAINING EXAMPLE		City: Melbourne
Comment TRAINING EXAMPLE		State: VIC
		Country: Australia [AU]
Exact Phonetic Fuzzy Level SCREEN Stemming Thesaurus Field Specific Remove business words Weighted	Search type:	For Fuzzy [1] matches. Field Specific on, Business words removal [Export, Sanctions, GSA, Police, PEP and International data groups.*] GSA data is updated in full every business day direct from SAM/EPLS.
Kemove business words	Date of search:	Monday, March 25, 2019
■ ECCN for country controls check: Select ECCN ▼	Time of search:	03:02 PM EDT

- "No Matching Records" •
- ✓ Okay to proceed

Restricted Party Screening



Regulations

INDIVIDUAL AND COMPANY SCREENING	VISUAL RESEARCH EDITION CONDITION
Name: Vladamir Putin Company:	NO MATCHING RECORDS FOUND Sanctions, embargoes, or risk alerts apply to the country supplied for this entity. Image: Search same keywords again Image: Search same New Search Vour search of the Visual Compliance Restricted Party Screening database failed to return any records. Comment: Training Example Image: Search same keywords again Image: Search Search Search criteria: Name: Vladamir Putin Company: n/a Address: n/a City: n/a State: n/a Country: Russian Federation [RU] *
Comment Training Example Exact Phonetic Fuzzy Level Z Screen Scren <	Search type: For Exact matches. Stemming on, Thesaurus on, Field Specific on, Business words removal [Export, Sanctions, GSA, Police, PEP and International data groups.*] GSA data is updated in full every business day direct from SAM/EPLS. Date of search: Friday, September 29, 2017 Time of search: 04:44 PM EDT *Country Notes: The following conditions apply to the country supplied for this entity. For sanctions, see the U.S. Sanctions and
 "No Matching Records" Transaction does not involve controlled activity under "Country Notes" ✓ Okay to proceed 	 Embargoes Programs Summary for more information. Subject to sanctions or special controls on specified items under EAR Part 746, Embargoes and Other Special Controls (and requirements under General Prohibition Six, Part 736). Restricted as an export destination under EAR Part 736 General Prohibition Three (Foreign-produced direct product reexports). Restricted as an export destination under EAR Part 736 General Prohibition Eight (In transit shipments and items to be unladen from vessels or aircraft). Subject to Government of Canada Economic Sanctions. Restricted as an export destination under Office of Foreign Assets Control (OFAC) Sanctions, or to Specially Designated Nationals under OFAC Sanctions. General Licenses may apply. Subject to Department of State Directorate of Defense Trade Control restrictions, limitations, denial policy, case-by-case basis, or delays on license applications for the export of U.S. Munitions List (USML) items. Subject to military end-user and/or end-use based control policy for specified ECCN dual-use items under EAR Part 744 or related policy, or policy of denial for CCL items that contribute to military capabilities. Subject to European Union Arms Embargoes or E.U. restrictive measures related to the export of arms based on political commitment Restricted as an export destination under EAR Part 736 General Prohibition Three (Foreign-produced direct product reexports) for ECCN 0A919 and 9x515 or "600 series" items in the Commerce Control List.
Country Notes are advisory only	Authorities: AECA Debarred Parties [DDTC] AFOSI - Top Ten Fugitives ATF Most Wanted Australia Foreign Affairs Consolidated List Blocked Pursuant to EO 13599 [OFAC] Canada Economic Sanctions





A country warning appears for countries where there are restrictions due to sanctions or embargoes (e.g., China, Iran, Cuba, Syria, North Korea). As long as the collaboration does not involve export control activities, there would be no concern for deemed exports.

Example-A: RPS is for Iran national. Scope of work is to conduct research. Assuming there were no results on individual; as long as research is considered fundamental and all data is publicly available, and the individuals is not going to work on any projects covered by a Technology Control Plan (TCP), there would be no concern for deemed exports.

Example-B: RPS is for visiting scholar from China. The visiting scholar will work on DoD funded research. Export Contols Officer should review to ensure there are no restrictions in the terms of the award and confirm that the project is not on a Technology Control Plan.



	Descarte	s Visual Compliance Research Edition
INDIVIDUAL AND COMPANY SCREENING		CCL/ECCN ITAR/USML Inventory RPS Reg
INDIVIDUAL AND COMPANY SCREENING Name: Denise Blake Company: Address: City: State: Country: Select country if applicable Comment Training Sample Exact Phonetic Fuzzy Level Stemming Thesaurus Field Specific	Search criteria: 《 Comment:	You searched for any records containing: Name: denise blake Company: n/a Address: n/a City: n/a State: n/a Country: n/a Comment: training search only
 Stemming Thesaurus Field Specific Remove business words Weighted ECCN for country controls check: Select ECCN ▼ Export Sanctions GSA Police PEP/OIG International Reset Defaults GSA data is updated in full every business day direct from SAM/EPLS. Fuzzy searches including GSA are automatically limited to level 2. Business endings is not selectable when already set as your offile default. Fuzzy or phonetic search with thesaurus often produces erratic results. 	Search type: Date of search: Time of search: PDF EXCEL	for Fuzzy [2] matches, which returned 1 result. Field Specific on, Business words removal [Export, Sanctions and GSA data groups.*] GSA data is updated in full every business day direct from SAM/EPLS. Thursday, August 27, 2020 10:06 AM EDT
• Event conrel	Reference	• Marie
Exact searchName does not match	<u>REL030381</u>	Shelia <mark>Denise</mark> BLAKES BATON ROUGE LA United States
✓ Okay to move forward	•	Fuzzy search Potential match Clear before moving forward

It is important to pay close attention to spelling in the search results and compare to what you typed in the search criteria.





When you click on the Reference link, a dialogue box will appear with additional details that may help in discerning whether the screening results are indeed connected to the individual or entity that you are screening.



Emailing Results

At the bottom of the search results will be an expandable box to "E-MAIL THESE RESULTS." Click on the + to expand.

<u>E-MAIL THESE RESULTS</u>

Send to me.

 \checkmark

Send to this address:

Send to addresses on my list:

Send to <u>address groups</u> on my list: Notations to this results email: david.sundvall@utrgv.edu

Please type carefully. Email addresses with errors cannot be delivered.

There are no email addresses in your personal distribution list. There are no email groups in your personal distribution list.

Include entity searched in subject line.

Include your name (the user who made the search) in subject line.

MAIL

Emailing results should only be to those within UTRGV who have a need to know.





Daily RPS Dynamic Screening Alert (CSRPS21)

Please exercise caution when clicking on links or opening attachments.

NOTICE: Visual Compliance RPS Dynamic Screening has found a same

Attn: UNIVERSITY OF TEXAS STATE SYSTEM - UNIVERSITY OF TEXAS

Original Search

User: USERSITY OF TEXAS RIO GRANDE VALLEY) Date of Search: Wednesday, April 30, 2014 Time of Search: 12:07:42 PM EDT Search Type: Exact [Export, Sanction, GSA, Police, PEP, International]

Name: N/A Company: KEVIN Address: \$FARMINGDALE\${NY} Country: US Comment: N/A

Dynamic Screening Alert

Date of Search: Tuesday, August 25, 2020 Time of Search: 12:28:55 PM EDT Alert Type: RED FLAG

MSR Reference Number: REL107636 Name: Kevin Michael MCKEOWN When an individual or entity has been screened it is automatically re-screened periodically. If the original search appears on a new list, or there is new information related to the search result – the person who conducted the screening will receive an email to alert of the update. The Export Controls Officer receives a copy of all dynamic screening alerts.

When these emails are sent, it is the Screener's responsibility to verify that the emailed results are not an issue. This is where inserting a comment in the original search becomes helpful.

Contact

<u>ResearchCompliance@utrgv.edu</u> when in doubt.



Questions or request for access to Restricted Party Screening with Visual Compliance should be directed to:

David Sundvall, Export Controls Officer E-INNV 1.120 <u>ResearchCompliance@utrgv.edu</u> 956-665-7873

