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, UCAR may not engage in any transaction with a restricted party.

- Restricted Party Screening (RPS) is a part of UCAR’s due diligence to ensure we are compliant with the regulations.
Conducting RPS

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.
Restricted Party Screening

Fields to use for RPS

Helps focus results

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 profile default. Fuzzy or phonetic search with thesaurus often produces erratic results.
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.
Understanding the Results
RPS Example

**INDIVIDUAL AND COMPANY SCREENING**

- **Name:**
- **Company:** Australian Bureau of Meteorology
- **Address:** 700 Collins Street, Docklands
- **City:** Melbourne
- **State:** VIC
- **Country:** Australia

**Visual Compliance**

- **Search criteria:**
  - **Name:** n/a
  - **Company:** Australian Bureau of Meteorology
  - **Address:** 700 Collins Street, Docklands
  - **City:** Melbourne
  - **State:** VIC
  - **Country:** Australia [AU]

- **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/ERLS.

- **Date of search:** Monday, March 25, 2019
- **Time of search:** 03:02 PM EDT

- **NO MATCHING RECORDS FOUND**

- **Comment:** Training Example

- **Screening Options:**
  - Exact
  - Phonetic
  - Fuzzy Level 1
  - Stemming
  - Thesaurus
  - Field Specific
  - Remove business words
  - Weighted

- **ECCN for country controls check:** Select ECCN...

- **SCREEN**

- **“No Matching Records”**
- **✓ Okay to proceed**
“No Matching Records”
Transaction does not involve controlled activity under “Country Notes”
✓ Okay to proceed

Country Notes are advisory only
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 Compliance Program Manager 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.
• Name does not match
✓ Okay to move forward

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

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 a expandable box that states “E-MAIL THESE RESULTS.” Click on the + to expand.

Emailing results should *only* be to those within UCAR/NCAR/UCP who have a need to know.
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 Compliance Program Manager 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 export@ucar.edu when in doubt.
End