Restricted Party Screening

Visual Compliance

David W. Sundvall,
Senior Manager, Risk and Export

April 2019
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.
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

- “No Matching Records”
- ✓ Okay to proceed
**RPS Example**

**INDIVIDUAL AND COMPANY SCREENING**

- **Name:** Vladimir Putin
- **Country:** Russia
- **Comment:** Training Example

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- **NO MATCHING RECORDS FOUND**
- Sanctions, embargoes, or risk alerts apply to the country supplied for this entity.
- **Comment:** Training Example
- **Date of search:** Friday, September 29, 2017
- **Time of search:** 04:44 PM EDT

**Search criteria:**
- **Name:** Vladimir Putin
- **Country:** Russian Federation

**Search type:**
- **Field Specific on, Business words removal**
- **ISMI date is updated in full every business day direct from SAM/ESRS.

**Country Notes:**
- The following conditions apply to the country supplied for this entity. For sanctions, see the U.S. Sanctions and Embargoes Programs summary for more information.
- Subject to sanctions or special controls on specified items under EDA Part 740. Embargoes and Other Special Controls (and requirements under General Prohibition Three, Part 730).
- Restricted as an export destination under EAD Part 736 General Prohibition Three (foreign-produced direct product re-exports).
- Restricted as an export destination under EAR Part 736 General Prohibition Eight (In transit shipments and items to be unloaded 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 EDCN dual-use items under EAR Part 744 and related policy, or policy of denial for CCL items that contribute to military capabilities.
- Subject to European Union Arms Embargoes or EU 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 re-exports) for EDCN 251199 and Sx5315 or "500 series" Items in the Commerce Control List.

**E-MAIL THESE RESULTS**

- **Authorities:**
  - AEDC Denied Parties (DDTC)
  - AFOSI Top Ten Fugitives
  - AFT Most Wanted
  - Australia Foreign Affairs Consolidated List
  - Blocked Pursuant to EO 13559 (OFAC)
  - Canada Economic Sanctions

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- **“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.
RPS Example

- 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.
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.
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.
Dynamic Screening Alerts

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