Purpose

Performance of Restricted Party Screening (RPS) of all international stakeholders to avoid transactions with Restricted Parties.

Applicability

Refer to “Department Responsibilities” below when engaging with international stakeholders.

Background

United States (U.S.) federal agencies maintain lists of restricted parties that include both foreign and domestic individuals as well as organizations, including universities and other research institutions. The reasons why the U.S. Government will designate a party as restricted vary, but generally, they serve to protect the national security, foreign policy, and economic goals of the United States. Without proper authorization such as an export license, the Government prohibits U.S. individuals and organizations from collaborating with or providing materials, services, and financial support to these restricted parties. Various agencies within the U.S. Government maintain lists of restricted parties that are updated daily, which include both foreign and domestic individuals as well as organizations.

Screening Tools

**Visual Compliance**

Within the University of California (UC) System, software called Visual Compliance is used to perform Restricted Party Screenings to ensure that the University is not interacting with restricted, denied, or debarred parties in violation of United States law. Visual Compliance performs “Dynamic Screening” which continually rescreens all previous screenings against updated lists.

**Refinitiv World-Check One**

The Office of Ethics and Compliance uses this tool for heightened due diligence beyond names included on published government lists of restricted entities. The proprietary Refinitiv dataset provides more detailed information on individuals and entities such as ties to foreign governments, politically exposed status, debarred associates and in some cases pending legal actions. Contact exportcontrol@ucsf.edu to discuss if this enhanced due diligence is needed.

Procedures

I. **Department Responsibilities**

   A. **Supply Chain Management, EH&S, International Shipping and Strategic Sourcing**

   These departments are required to perform RPS screening using Visual Compliance for the following:

   - Recipients and end-users of overseas shipments
   - Foreign suppliers providing materials to UCSF entities operating overseas
   - Overseas personnel such as independent contractors receiving payments or refunds from UCSF
B. **Office of Sponsored Research (OSR, GBC, ICD)**

The Office of Sponsored Research is required to perform RPS screening using Visual Compliance for the following:

- Foreign sponsors
- Foreign collaborators and their institutions
- Foreign suppliers
- Overseas agents
- Foreign hotels/accommodations utilized by UCSF personnel
- Others overseas participating in UCSF international collaborations

C. **Development and Gifts Administration**

University Development and Alumni Relations (UDAR) is required to perform RPS screening using Visual Compliance and Refinitiv World-Check One (contact exportcontrol@ucsf.edu for World-Check One access):

- Foreign donors of gifts, whether financial or otherwise (screen individuals and organizations)
- Foreign government personnel hosting events or facilitating meetings in support of donations
- Overseas assistants, facilitators, or other affiliates involved in “Development”
- Foreign recipients receiving returned funds
- Overseas collaborators who have ties to foreign governments including family members

D. **HR and Academic Affairs**

These departments are required to perform RPS screening using Visual Compliance for the following:

- Foreign postdoctoral scholars recruited to join UCSF
- Visiting foreign students/researchers/fellows
- All other international personnel who may either be recruited to join or visit UCSF

E. **International Students and Scholars Office (ISSO)**

ISSO is required to perform RPS screening using Visual Compliance for the following personnel to avoid transactions with restricted parties:

- Foreign postdoctoral scholars recruited to join UCSF
- Visiting foreign students/researchers/fellows
- All other international personnel who may either be recruited to join or visit UCSF

F. **International Research Support Operations (IRSO)**
IRSO and Global Programs for Research and Training (UCSF foreign affiliate offices) are required to perform RPS screening using Visual Compliance for the following:

- Foreign organizations providing services to overseas operations
- Foreign personnel hired to work on UCSF overseas projects
- Foreign suppliers
- Foreign agents paid to represent UCSF overseas interests
- Foreign hotels/accommodations
- Potential foreign partners

**G. Institute for Global Health Sciences and Other Departments Engaging with Foreign Entities**

Institute for Global Health Sciences is required to perform RPS screening using Visual Compliance for the following:

- Foreign collaborators including hospitals and medical organizations
- Foreign organizations providing services to overseas operations
- Foreign personnel hired to work on UCSF overseas projects
- Overseas suppliers
- Overseas agents paid to represent UCSF overseas interests
- Potential foreign partners

**II. Accessing Visual Compliance**

Perform restricted party screening of end user individuals and their organizations. Refer to the document “Export Control Procedures – Restricted Party Screening” for a step-by-step guide to screening and escalation of the results to the Export Control Officer.

**III. Training and Resources**

1. Departments shall all be required to either designate individuals to be able to perform this function, such as an Export Control Liaison, or provide training to all personnel as applicable.
2. Comprehensive Export Control Liaison training is available for persons serving as Liaisons for their departments. Additional training is available on-demand from the Export Control unit within the Office of Ethics and Compliance.