



University of California
San Francisco

Export Control Procedures – Restricted Party Screening

NUMBER	DATE	PAGE
1	06/18/2021	1

Purpose

In line with U.S. Government regulations, UCSF conducts Restricted Party Screening (RPS) of all international stakeholders to avoid transactions with Restricted Parties.

Applicability

RPS will be conducted on all international individuals and entities that do business with UCSF. RPS must be completed prior to the commencement of the relevant activities.

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.

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. Responsibilities

- a. Departments are responsible for using RPS to screen: international stakeholders, individuals and entities, including overseas entities hosting UCSF; those participating in UCSF projects, sponsoring UCSF activities, collaborating in UCSF transactions, or even receiving material transfers. This includes hotels and other foreign entities providing support services.
 - a. Departments shall all be required to either designate individuals to perform Restricted Party Screening, such as an Export Control Liaison or provide access to Visual Compliance to all personnel as applicable. Designated Restricted Party Screeners should be those involved in project vetting and/or agreement vetting

Export Control Procedures – Restricted Party Screening		
NUMBER	DATE	PAGE
1	06/18/2021	2

such as contracts and grants, material transfer agreements (MTAs), and other partnership agreements.

- b. Export Control provides expertise and oversight of the restricted screening process, including training and access to tools for department designees. Export Control also provides direct support for potentially high-risk entities and transactions. **Export Control should be contacted at exportcontrol@ucsf.edu if the following issues arise:**
 - a. The transaction involves an individual or entity in a high-alert country, including Cuba, Iran, Syria, Sudan, or North Korea.
 - b. The transaction involves a shipment or another type of transfer of items or information
 - c. Confirmed or potential matches using Visual Compliance screening tool

II. Accessing Screening Tools

- a. All UC employees can register for an account with Visual Compliance to perform Restricted Party Screenings.
 - a. To register for an account, visit <https://www.visualcompliance.com/usr> and complete the steps listed.
 - b. Fill in the form, and make sure to use your @UCSF.edu email address.
 - c. From there, Visual Compliance will send you an email containing a registration link.
- b. Once registered, log into Visual Compliance and navigate to the Restricted Party Screening tool. Login page url: <https://www.visualcompliance.com/logon.cfm>

III. Performing Restricted Party Screening (RPS) for international sponsors and collaborators

RPS must be conducted before the commencement of the relevant activities.

- a. Access your Visual Compliance account. If not already registered with a Visual Compliance account, the designated RP Screener should follow the instructions in Section II to create a registered account.
- b. Sign in to Visual Compliance at <https://www.visualcompliance.com/logon.cfm> and navigate to the Restricted Party Screening Tool.
- c. **A critical step for utilizing the Dynamic Screening feature of RPS** is to include transaction-specific information in the **Comment** field. Dynamic Screening allows the University to follow up on parties who were initially cleared but may subsequently be designated as restricted months or years later.
 - i. **In the COMMENT field, make sure to include key details of why this search is being performed**, so that future department designees who may receive an alert about a match years later will be able to understand why this screening was initially conducted, and determine whether any follow-up is needed to resolve the match.
 - ii. Details specific to the transaction are helpful, such as PROJECT ID if it exists, Project PI, the REASON for this screening, such as a Visiting Scholar, an International Shipment, or a payment to a foreign entity.

Export Control Procedures – Restricted Party Screening

NUMBER	DATE	PAGE
1	06/18/2021	3

- d. Select “Fuzzy Level” and set it at “2”.
- e. Enter both the first and last name of the individual you are screening for the broadest search results. Including additional information such as the name of their organization and their country may be useful for a follow-up step to further the search results however use of too many fields may result in false negatives.
- f. Click on the SCREEN button.
 - i. At the bottom of the page, all the different lists/databases of restricted parties that were searched for this screening should be viewable.
- g. If your screening produces NO RECORDS RETURNED or words of similar effect, indicating zero matches, please proceed with your transaction (See Instructions below for record retention requirements).
 - i. COUNTRY ALERT FOR CUBA, IRAN, NORTH KOREA or SYRIA: If your screening does not produce a match, but does produce a country alert for Cuba, Iran, Syria, or North Korea ([comprehensively sanctioned countries](#)), you must escalate your screening to exportcontrol@ucsf.edu for review. An export license may be required for the proposed activity.
 - ii. COUNTRY ALERT FOR ANY OTHER COUNTRY: If your screening does not produce a name match, but does produce a country alert for any country other than the comprehensively sanctioned countries mentioned above, you are clear to proceed with your transaction **unless it is an international shipment**.
 - iii. If your transaction involves a shipment or another type of transfer of items or information, please contact your Export Control Officer at exportcontrol@ucsf.edu for a review.
- h. If your screening produces a name match, PAUSE the transaction and review the results for accuracy (e.g., verify the names are spelled correctly). Review any links provided by Visual Compliance (e.g., Federal Register notice of that name) to confirm accuracy.
 - i. The goal is to confirm or conclusively eliminate the match.
 - ii. Comparing dates of birth (DOB) between two individuals with the same name is a useful way of verifying a potential match. Mismatched DOBs usually indicates that the name is not a match.
- i. For confirmed matches, or in cases where you are unsure if a match can be cleared (for example, if you don’t have details such as DOB) escalate the screening to exportcontrol@ucsf.edu for a review.
 - i. Please provide the reason why you performed the screening (e.g., type of transaction, background information about the activity).
 - ii. The Export Control Officer will review the screening and evaluate if an export license may be required.
 - iii. **Do not proceed** with the transaction until the Export Control Officer indicates the transaction is cleared to proceed.
- j. For record retention purposes consistent with UCSF’s record retention policies, review the University of California’s [record retention guidance](#) (search under “Export”)
 - i. Download a PDF of your RPS results to save in a shared location or email them to your team (consider which practice works best for personnel succession, as results may need to be referenced by different staff several years later).



Export Control Procedures – Restricted Party Screening

NUMBER	DATE	PAGE
1	06/18/2021	4

- ii. Retain RPS results with the file or project information. Documentation of RPS results must be available for subsequent audit and review in cases of Dynamic Screening Alerts.
- iii. Please note that Visual Compliance maintains a record of every screening performed and that the Export Control Office has access to these records.

IV. Issues and alerts to watch for in your RPS results (“red flags”):

- a. Personnel from comprehensively sanctioned countries (Cuba, Iran, Syria, or North Korea)
- b. Politically exposed persons (PEPs), such as individuals who have close ties to a foreign government such as a foreign government minister, or relative of government officials. PEPs are at risk for corrupt payments such as if a gift is provided with an expectation of favors from the foreign government (*e.g.*, Foreign Corrupt Practices Act, or FCPA).
- c. Any unusual affiliations, including unofficial affiliations such as informally acting as an agent on behalf of others
- d. Foreign military affiliations
- e. Any other unusual aspects of a transaction or inappropriate business arrangements that seem out of place.

V. Best Practices for escalations arising out of RPS screening

- a. Unresolved red flags should be escalated to exportcontrol@ucsf.edu
- b. If the name match is unresolved, contact exportcontrol@ucsf.edu
- c. If there is no name match but there is a country alert, this doesn’t necessarily mean you have a restricted entity, but it does mean there are restrictions or sanctions applied to this country (see Section III(g) above). You are clear to proceed with your transaction unless it is an international shipment. If your transaction involves a shipment or another type of transfer of items or information, please contact your Export Control Officer at exportcontrol@ucsf.edu for a review. For any doubt about a country alert, escalate it to exportcontrol@ucsf.edu.
- d. If your screening produces any positive results for the person, or an organization, escalate the screening email to exportcontrol@ucsf.edu or by using the “emailing these results” feature in Visual Compliance. From there, the Export Control Officer will review the results and provide you with guidance regarding any applicable regulations, export licensing or additionally required documentation.
- e. The Export Control Officer (ExportControl@ucsf.edu) will review any escalations including alerts indicating that the status of a screened individual, institution, or entity is positive.

VI. Training and Resources

- a. 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.



University of California
San Francisco

Export Control Procedures – Restricted Party Screening		
NUMBER	DATE	PAGE
1	06/18/2021	5

- b. 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.