# **RESTRICTED PARTY SCREENING GUIDE**

Within the UC System, we use <u>Visual Compliance</u> to perform Restricted Party Screenings to ensure we are not interacting with restricted, denied, or debarred parties in violation of United States Law. 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 include both foreign and domestic individuals as well as organizations. These lists are updated daily, so a valuable feature of Visual Compliance is their "Dynamic Screening," which continually rescreens all previous screenings against these updated lists. It is important to keep in mind that these restricted parties may also include universities and other research institutions.

## VISUAL COMPLIANCE

All UCI employees can register for an account with Visual Compliance to perform Restricted Party Screenings. To register for an account, visit <u>https://www.visualcompliance.com/usr</u> and complete the steps listed. **Please be sure to use your @uci.edu email address**. Once registered, log into <u>Visual Compliance</u> and navigate to the Restricted Party Screening tool.

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	DESCARTES Visual Compliance	
	Please enter your username to continue	
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	Don't have an account? Sign.Up	
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# NAVIGATE TO STANDARD SEARCH

DESCARTES <sup>®</sup> Research Edition (Log Off) Contact Us Online Visual Compliance						
Home Screening Listings Batch Screen		Batch Screening	US Regulations	EU Regulations		
Restricted Party Screening          Standard Search         Administrative Screening         Multi-Party Search         Batch Screening Upload		Welcome				
		To get started, please select one of the options to the left, or choose from the drop-down menus above.				
		For assistance, please reach out to our <u>Customer Service</u> team—they will be happy to help.				
n	nce <u>Screening</u> ty Screening ing	nce <u>Screening</u> Listings ty Screening ing	Screening     Listings     Batch Screening       ty Screening     Welcome       ing     To get started, ple or choose from the For assistance, ple team—they will b	Screening     Listings     Batch Screening     US Regulations       ty Screening     Welcome       ing     To get started, please select one of the or choose from the drop-down menus a       For assistance, please reach out to our team—they will be happy to help.		

## PERFORM A RESTRICTED PARTY SCREENING

Name	name		- 1
Company	company		2
Address	street number	street name	extension
	Street No.	Street Name	Extension
City	city	State state	3
Country	Select country if applicable	e Zip	zip code
	Comment	- 1 a	dd comments
	ECCN for country cont	rols check ECCN	Ŧ
	Phonetic 💿 Fuzzy	Weighted Combined	

1. **Name** – Enter the individual's complete first and last name. Do not include a middle name, manners of address (Mr., Mrs., Dr., etc.), or degrees/credentials (M.D., Ph.D.) since there is uncertainty around governments' use of and style employed when adding entities to the restricted party lists.

2. **Company/Organization/University** – Enter the organization's complete name. For example, please use "University of California" instead of "UC." Do not include acronyms.

3. **Country** – Enter the home country for the individual or company. If there are multiple countries, please run multiple screenings.

4. **Comment** – Enter your department, PI, and/or reason for screening. If you are performing test or practice screenings, please include the word "test" in the comment field so the screening can be removed from future Dynamic Screening.

5. Search Settings – Please use "Fuzzy Level 2."

6. **Screen** – Click the "SCREEN" button to perform the Restricted Party Screening.

## SCREENING RESULT 1: NO MATCHES FOUND

If your screening produces 0 record returned as shown below, and the person/organization you screened is not from Cuba, Iran, Syria, North Korea, or Ukraine (Crimea, Donetsk, & Luhansk Regions), please proceed with your transaction. If your transaction involves a shipment or another type of transfer of items or information, please contact the Export Control Office at <a href="mailto:exportcontrol@uci.edu">exportcontrol@uci.edu</a>.

Standard Search		
+ Search Criteria		
FUZZY	ADDRESS SEARCH	
<b>0</b> record returned.		
List ID Na	me	Reference

## SCREENING RESULT 2: MATCHES FOUND

If your screening produces a definitive match, you need to **PAUSE** the transaction and escalate the screening to the Export Control Office at <u>exportcontrol@uci.edu</u> for a review. Please make sure to include the reason why you performed the screening and include any supporting documentation. The Export Control Office will review the screening and evaluate if an export license may be required. **Do not proceed with the transaction until the Export Control Office indicates the transaction is clear to proceed.** 

Standard	Search				Screening Quicklinks
+ Search Crite	ria				Search These Keywords Again
FUZZY ADDRESS SEARCH				<u>New Search</u>	
				Email Results	
1 record return	1 record returned.				PDF Results
List ID	Name		Reference	Alert	Authorities Searched
DPL000444	SUNTEK MICROWAVE, INC. 8698 Thorton Avenue Newark CA United States		<u>69 FR 26360</u>	ß	Sanction Programs Summary OFAC Program Summary
*					GSA Cause And Treatment Codes

If your screening produces potential matches, try to eliminate each potential match using supporting documentation. Supporting documentation may include passports, company websites, drivers' licenses, etc. You may need to click on the "List ID" link for additional company/person details. You may proceed with the transaction if <u>all</u> potential matches can be eliminated. Save your review and screening for your files. If there are remaining potential matches, forward the screening request and any supporting documentation to the Export Control Office for further analysis. Upon receipt, the Export Control Office will review any remaining potential matches and provide the screener with a final determination of no match or positive match.

Standard Search				Screening Quicklinks		
+ Search Criteria				Search These Keywords Again		
FUZZY ADDRESS SEARCH				New Search		
				Email Results		
6 records retur	ned.				PDF Results	
List ID	Name		Reference	Alert	Authorities Searched	
OWL000159	FIRST <mark>AMERICAN</mark> INTERNATIONAL <mark>BANK</mark> , INC. Pawnee Nation OK United States			2	Sanction Programs Summary	
<u>OWL000406</u>	SWISS <mark>AMERICAN BANK</mark> Nauru			B	OFAC Program Summary GSA Cause And Treatment Codes	
<u>OWL000162</u>	FIRST BANK OF NORTH AMERICA			B	Descartes Visual Compliance	
<u>OWL000160</u>	FIRST AMERICAN INTERNATIONAL BANK LTD.			B	Quicklinks	
OWL000044	BANKING CORPORATION OF AMERICA, LTD.			B	Best Practices	
<u>OWL000041</u>	BANK OF NORTH AMERICA			B	Training	

# SCREENING RESULT 3: COUNTRY ALERTS

# COUNTRY ALERT FOR CUBA, IRAN, SYRIA, NORTH KOREA, OR UKRAINE (CRIMEA, DONETSK, & LUHANSK REGIONS)

If your screening does not produce a match, but does produce a country alert for Cuba, Iran, Syria, North Korea, or Ukraine (Crimea, Donetsk, & Luhansk Regions) (comprehensively sanctioned countries), you must escalate your screening to the Export Control Office at <u>exportcontrol@uci.edu</u> for review. **An export license may be required for the proposed activity.** 



## COUNTRY ALERT FOR ANY OTHER COUNTRY

If your screening does not produce a 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, except for international shipments. If your transaction is an international shipment or involves another type of transfer of items or information, please contact the Export Control Office at exportcontrol@uci.edu for a review.

## DYNAMIC SCREENING ALERTS

Since the U.S. Government updates denied or restricted-party lists daily, Visual Compliance automatically rescreens all previous searches against these updated lists. If your original search matches a recently added entity, you will receive a Dynamic Screening Alert. Review the alert to determine if it is a definitive match, no match, or possible match. Email Export Control at <u>exportcontrol@uci.edu</u> with your review results. If it is a definitive or possible match, include a reason for the original screening and any supporting documentation.

## OTHER SEARCH SETTINGS (FROM VISUALCOMPLIANCE.COM)

### **Exact search**

- An Exact Search looks for identical spelling in keywords, with some exceptions based on Search Modifications detailed below
- This is Visual Compliance's most accurate and most popular Search Type, but there are certain situations when it's best to use another Search Type

#### Fuzzy search

- A Fuzzy Search finds common misspellings and typos
- Search fuzziness can be adjusted from 1 to 4, 1 being the least fuzzy and 4 being the most fuzzy, accommodating for a greater number of misspellings

- Fuzzy does not expand abbreviations, such as "University" for "Univ"
- Users might choose the Fuzzy Search when they are not confident in the spelling of the keywords they are screening
- Example: A Fuzzy Search for "Wayne Smyth" would trigger a match on "Wayne Smith"

## Phonetic search

- A Phonetic Search finds matches that "sound" like the keywords supplied, for all words supplied
- Phonetic uses the universal "Soundex" algorithm and does not substitute first characters. As such, it may not be reliable for transliterated names where, for example, one translator might use "Q," another "K," for the same sound at the beginning of the name
- Example: If you were asked to perform a Phonetic search on the name "Mohammed," Visual Compliance would also recognize the many spelling variations of the name (Mohamed, Mohamad, etc.)

### SEARCH MODIFICATIONS

### Stemming

- Stemming extends a search to cover grammatical variations on a word
- When Stemming is selected, the search engine locates words with the same root but different endings, such as -ed and -ing
- Example: A search for the word "apply," also finds the words "applies," "applied," and "applying" **Thesaurus** 
  - Thesaurus searches synonymous values for proper names and geographic place names
  - Thesaurus is not recommended for use with Fuzzy or Phonetic search. The Thesaurus check box is automatically cleared when the Fuzzy or Phonetic search is selected
  - Example: Screening the name "Bob" will also return matches containing "Robert" or "Rob," and screening "Britain" will also return matches containing "England" or "U.K."

### Field-specific

• Selecting Field-Specific prevents keywords supplied from being screened against the "Notes" field in the database as well as the respective name, or company, city, state, and country fields. Deselecting this option searches the keywords supplied in the result Notes as well as the regular fields

### Remove business words

- Matching the form or style of business declarations (such as "Ltd," "Co" or "GmbH") can be problematic; for which Visual Compliance includes an implementation option to strip business declarations that is recommended for all users
- Example: A search for "Acme Laboratories Limited" will not match if the official government form is "Acme Laboratories Inc." The Remove Business Words modification equates the two expressions

### Disable Dynamic MOTR

- Selecting this will disable the default word-pair function, which screens permutations of the first three words, excluding business words if you have that checkbox activated.
- Example: A search for "University of Illinois at Urbana Champaign" will search for any matches for "University Illinois," "Illinois Urbana," "University Urbana," etc.

It is important to remember that combining certain Search Types and Modifications can result in many more results than expected. Combining a Fuzzy Search with Stemming and Thesaurus might be considered "casting the net too wide" and return an unnecessary amount of unrelated matches.

For example, screening "Bill" with Fuzzy, Stemming and Thesaurus could produce matches on "Bills," "Bell," "Bells," "Bull," "Bulls," "Ball," etc., as well as "Will," "William," "Billy," "Willy," "Willie," and so on. The use of Stemming and/or Thesaurus is not suggested when using either the Fuzzy or Phonetic Searches.