Restricted Party Screening
through Descartes / Visual Compliance

University Export Control Program
https://rgw.arizona.edu/compliance/export-control-program
export@arizona.edu
Why UA Conducts RPS

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

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

- RPS should be conducted before engaging in any transaction (e.g., research, collaborations, procurement, etc.)
Restricted Party Screening
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 System

Welcome
[ARIZ SYS - UNIVERSITY OF ARIZONA]

- Controlled Goods (CCL/ECCN)
- U.S. Munitions List (ITAR/USML)
- Classification Inventory
- Restricted Party Screening
- Administrative Screening
- Federal Regulations, Rules, and Notices
- Recent Federal U.S. Documents
- Incident Management Workflow
- Global Trade Resources
- Tech Data and Hardware Exports

Best Practices
Incident Manager
Deemed & Hand-Carried
Tech Data & Hardware
Export Documents

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Restricted Party Screening System

These enabled features help to focus results and minimize false-positives.

Fields to use for RPS
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 because the system gives priority to the Company search results. This in turn could result in a false result if the individual name is on a prohibited party list.
Understanding the Results
RPS Example #1

- "No Matching Records"
  - Okay to proceed
Example #2

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

Use Discernment – UECP Does Not Need to See All Country Warning Results
What are Country Warnings?

A country warning appears for countries where there are restrictions due to sanctions or embargoes (e.g., China, Iran, Syria, North Korea). As long as the transaction does not involve export control activities, UECP does not need to review.

**Example-A:** RPS is for Iran national and their H1B application. Scope of work is to teach and 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), UECP does not need to review RPS results.

**Example-B:** RPS is for visiting scholar from China. The visiting scholar will work on DoD funded research involving cybersecurity. UECP 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.
Example #3

- 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.
Location and AKA verified
100% Match
Do not move forward; contact UECP
Even though the names do indeed match, are you sure it is a true match?

Let’s assume the “Alexis Flores” you are screening is a female. Is there anything in the results that would confirm this may be a female? Look at AKA’s.

You can also click on the hyperlink reference number for additional details.
Verifying 100% Match Results

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 the University that have a need to know.
Dynamic Screening Alerts

When an individual or entity has been initially 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.

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 (Refer to slide 7).

If the search results are not applicable, please forward the Dynamic Screening Alert email to UECP (export@email.Arizona.edu) to have the lists ‘cleared’ with an explanation as to why the results are not applicable to the original search. (i.e., name does not match, address does not match, not the same person/entity, different date of birth, etc.)