Descartes Visual Compliance Restricted Party Screening Instructions for the University of Illinois Urbana-Champaign

The University of Illinois uses Descartes Visual Compliance (Visual Compliance) to expedite screening of several U.S. Government lists of individuals or entities that are barred, otherwise restricted from entering into certain types of transactions with U.S. persons. The lists, which may be found in Visual Compliance under the Authorities Consulted List, are specifically applicable to export controls and must be screened to ensure that the University does not engage in a transaction with a barred entity. ***Please note that the Authorities Consulted List also includes other compliance lists such as General Services Administration and Illinois Health Services that are used for additional compliance purposes.*

Restricted party screening must be completed for all:

- All UIUC new hire final candidates including the final candidate's CV/resume
- Foreign sponsors and vendors
- Foreign research collaborators
- Foreign sponsors of international travel and international conferences
- University-sponsored applicants on H1-B and J-1 Research Scholar, Professor, and Short-Term Scholar visas
- All personnel associated with export-controlled research
- Foreign entities with whom the University has Confidentiality or Non-Disclosure Agreements
- Foreign visitors and visiting scientists
- All Subcontractors and Subawardees to sponsored projects
- Parties to Materials Transfer Agreements

You should keep a record of each restricted party screening you conduct. The Export Compliance Officer will work with each unit on how and where each unit will retain search records.
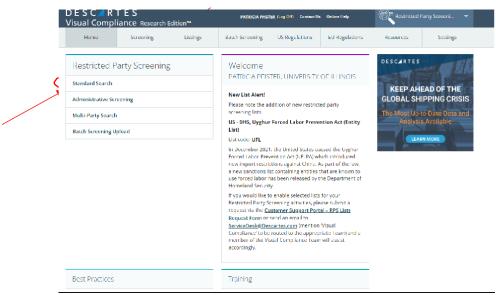
Getting Started

Login

Once you are registered to use Visual Compliance, you will directly access the website https://www.visualcompliance.com/ and login using your UIUC.edu email as your username and the password that you created at registration.

RPS Search Page

Once logged in, click on Standard Screening in the bolded list at the left of the screen; or click on Screening at the top of the page and then click on Standard Screening from the dropdown list:

Search Tips

- Individuals (Name) and entities (Company or Institution) must be screened separately.

- All words entered in the respective fields are evaluated in the search. This means that if all of the words you supply do not occur in a given target record, that record will not be returned in the results, the same as in an eBay or a Google search. Use the fewest words necessary when searching.

    EXAMPLE: In a search for the University of Illinois, you might enter the words "University Illinois" You retrieve results, including the University of Illinois at Chicago. However, on your second try, you enter "University of Illinois at Chicago" Your results do not include the University of Illinois (the target record) because you added the word "Chicago" in your keywords, which does not occur in the target record.

- NEVER check the box for "Exclude search from Dynamic Screening" on the search screen. Dynamic Screening will be explained within this document below.

Terms Found on Search Page

- Exact – Returns records containing whole or partial exact matches to the spelling of the keywords entered, for all keywords supplied. (The keywords provided will be modified in the search with the use of stemming or thesaurus.)

- Phonetic – Accounts for variations in the way a name can be spelled; looks for letter combinations that sound the same.

- Fuzzy – Looks for words with letters that resemble those searched, compensating for minor spelling errors, with levels of sensitivity of 1 to 4.

- Weighted – Will perform a search based on the similarities between the searched information and the restricted party lists and provide a percentage-based alert level.

- Combined - Will perform all of the previously mentioned searches together and display the results in two or more tabs.

- Stemming – Automatically adjusts for word endings, (i.e. –ed, –ing), returning results containing the "root" of the word.

- Thesaurus – Accounts for variations in form and style for geographic place names (United Kingdom, Great Britain, England, U.K.) and possible variations in proper names (Robert, Rob, Bob, Bobby).

- Field Specific – Prevents name and company keywords from being searched in the 'Notes' field. Deselect to also search Notes.

- Remove business words - Strips business declarations. Recommended for all users.

- ECCN for country controls check - Runs the ECCN number selected through the Commerce Country Chart license determination evaluation for the country entered in the RPS search.

- Exclude search from Dynamic Screening – Allows searchers to bypass the Dynamic Screening process. This box should NEVER be checked. Dynamic Screening is a key feature of Visual Compliance.

- Export, Sanctions, GSA, Police, PEP/OIG, International, Optional Lists - You will generally want to check all of the lists which is how the default is set. However, you have the option of choosing the specific lists you want to check.

Conduct a Name Search

1. Enter the first name and last name of the person you wish to search in the Name box. Do not include a middle name.

   NOTE - Address, City and State, Country, Zip Code fields are optional. When a country name is included in the search request, any risk country alerts for sanctions, embargoes, and other prohibitions and cautions are returned with the search results. You may include Country for a Name Search, but it is not recommended.

2. Choose the appropriate search description from the Comment dropdown menu. For Example, if the search is being conducted in the Office of Sponsored Programs, the choices will be Proposal and Agreement.

3. In the free add comments text field, type in identifying information for the office, unit for which you are conducting the search. For Example, if the search is being conducted in the Office of Sponsored Programs, the myResearch IP Number is entered when screening is conducted at proposal stage and the myResearch Agreement Number when screening is conducted at award stage and the myResearch Agreement and myResearch Subaward Number when screening is conducted for a subaward. If the search is being conducted on a new hire, include the new hire name or record number.

   NOTE – Comments are displayed in email reports and saved in the audit log for later reference. You may not leave the Comments or the 'add comments' free text field blank or ambiguous.

4. Click Fuzzy Level box and choose 2 from the dropdown.

5. Ensure defaults for Field Specific and Remove business words boxes are checked.

6. Check Thesaurus box when doing a Name Search only.

7. Hit the **Screen** button.

Name Search No Matching Records

The desired result of search is "0 record returned". If you conduct a Name Search and there are no matching records, click New Search (If you are screening multiple people and/or companies or institutions for the save activity, Search These Keywords Again will retain the information contained in your comment box and dropdown selection) and proceed to Conduct a Company or Institution Search instructions below.

Name Search Matching Records

If you conduct a Name Search and are ANY matching records for the person name, email the results to yourself and to the Export Compliance Officer (exportcontrols@illinois.edu) through the Visual Compliance Email Results function before proceeding with the document or activity.

Include exportcontrols@illinois.edu on the Send to this address text box. Include a note about your search in the Notations to this result email: text box. Check the Include entity searched in the subject line and include your name (the user who made the search) in the subject line.
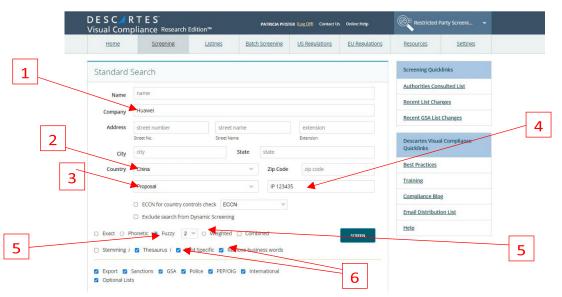
Conduct a Company or Institution Search

1. Enter the company, institution, entity you wish to search in the Company box. You should search each foreign collaborator, institution, company, business listed in your documents.
   NOTE - Address, City and State fields are optional.

2. Choose the appropriate country from the Country dropdown menu.
   NOTE - Country is not optional for a Company or Institution Search. When a country name is included in the search request, any risk country alerts for sanctions, embargoes, and other prohibitions and cautions are returned with the search results.

3. Choose the appropriate search description from the Comment dropdown menu. For Example, if the search is being conducted in the Office of Sponsored Programs, the choices will be Proposal and Agreement.

4. In the free add comments text field, type in identifying information for the office, unit for which you are conducting the search. For Example, if the search is being conducted in the Office of Sponsored Programs, the myResearch IP Number is entered when screening is conducted at proposal stage and the myResearch Agreement Number when screening is conducted at award stage and the myResearch Agreement and myResearch Subaward Number when screening is conducted for a subaward. If the search is being conducted on a new hire, include the new hire name or record number.

   NOTE – Comments are displayed in email reports and saved in the audit log for later reference. You may not leave the Comments or the 'add comments' free text field blank or ambiguous.

5. Click Fuzzy Level box and choose 2 from the dropdown.

6. Ensure defaults for Field Specific and Remove business words boxes are checked.

7.   Hit the Screen button.

Company or Institution Search No Matching Records

The desired result of search is "0 record returned". If you conduct a Company or Institution Search and there are no matching records, you may proceed with the activity and/or processing your documents.

Company or Institution Search Matching Records

If you conduct a Company or Institution Search and are ANY matching records for the institution, company, entity, etc., email the results to yourself and to the Export Compliance Officer, exportcontrols@illinois.edu, through the Visual Compliance Email Results function before proceeding with the document or activity. In addition, please call the Export Compliance Officer to notify her at 312-413-8191.

Include exportcontrols@illinois.edu on the Send to this address text box. Include a note about your search in the Notations to this result email: text box. Check the Include entity

searched in the subject line and Include your name (the user who made the search) in the subject line.

Dynamic Screening Alert

Visual Compliance maintains an audit trail of all restricted party screenings and has a dynamic screening function that rescreens all entries daily and provides a notification if there is ever a change in the status of a previously screened party. The Export Compliance Officer is the Visual Compliance Account Manager and receives all change of status notifications and has access to all prior screening transactions for audit purposes.

If there is ever a change in the status of a previously screened party, you, as the original search registered user, will receive an email from Visual Compliance. The sender is report@visualcompliance.com and the subject line is Daily RPS Dynamic Screening Alert.

The body of the email will begin with:

NOTICE: Visual Compliance RPS Dynamic Screening has found a same-alert match for a previously screened party.

Following that notice will be details on the original search and the status change.

If you ever receive a Dynamic Screening Alert email, please forward that to exportcontrols@illinois.edu. The Export Compliance Officer will be able to assist you with next steps.

Record Keeping

Record keeping for audit purposes is important. When you conduct a restricted party screening, your work must be recorded and accessible. At a minimum, the date, subject and results of a Visual Compliance screening should be kept either electronically or by hardcopy. The Export Compliance Officer can work with your unit to determine a good method of storage and retrieval.

Reference

Department of Commerce – Bureau of Industry and Security

Denied Persons List- Individuals and entities that have been denied export privileges. Any dealings with a party on this list that would violate the terms of its denial order are prohibited.

Unverified List- Parties listed on the Unverified List (UVL) are ineligible to receive items subject to the Export Administration Regulations (EAR) by means of a license exception. In addition, exporters must file an Automated Export System record for all exports to parties listed on the UVL and obtain a statement from such parties prior to exporting, reexporting, or transferring to such parties any item subject to the EAR which is not subject to a license requirement. Restrictions on exports, reexports and transfers (in-country) to persons listed on the UVL are set forth in Section 744.15 of the EAR. The Unverified List is set forth in Supplement No. 6 to Part 744 of the EAR.

Entity List- Parties whose presence in a transaction can trigger a license requirement supplemental to those elsewhere in the Export Administration Regulations (EAR). The list specifies the license requirements and policy that apply to each listed party.

Department of State – Bureau of International Security and Non-proliferation

Nonproliferation Sanctions - Parties that have been sanctioned under various statutes. The linked webpage is updated as appropriate, but the Federal Register is the only official and complete listing of nonproliferation sanctions determinations.

Department of State – Directorate of Defense Trade Controls

AECA Debarred List – Entities and individuals prohibited from participating directly or indirectly in the export of defense articles, including technical data and defense services. Pursuant to the Arms Export Control Act (AECA) and the International Traffic in Arms Regulations (ITAR), the AECA Debarred List includes persons convicted in court of violating or conspiring to violate the AECA and subject to "statutory debarment" or persons established to have violated the AECA in an administrative proceeding and subject to "administrative debarment."

Department of the Treasury – Office of Foreign Assets Control

Specially Designated Nationals List – Parties who may be prohibited from export transactions based on OFAC's regulations. The EAR require a license for exports or reexports to any party in any entry on this list that contains any of the suffixes "SDGT", "SDT", "FTO", "IRAQ2" or "NPWMD"."

Foreign Sanctions Evaders List: Foreign individuals and entities determined to have violated, attempted to violate, conspired to violate, or caused a violation of U.S. sanctions on Syria or Iran, as well as foreign persons who have facilitated deceptive transactions for or on behalf of persons subject to U.S. Sanctions. Transactions by U.S. persons or within the United States involving Foreign Sanctions Evaders (FSEs) are prohibited.

Sectoral Sanctions Identifications (SSI) List: Individuals operating in sectors of the Russian economy with whom U.S. persons are prohibited from transacting in, providing financing for, or dealing in debt with a maturity of longer than 90 days.

Palestinian Legislative Council (PLC) List: Individuals of the PLC who were elected on the party slate of Hamas, or any other Foreign Terrorist Organization (FTO), Specially Designed Terrorist (SDT), or Specially Designated Global Terrorist (SDGT).

The List of Foreign Financial Institutions Subject to Part 561 (the Part 561 List): The Part 561 List includes the names of foreign financial Institutions that are subject to sanctions, certain prohibitions, or strict conditions before a U.S. company may do business with them.

Persons Identified as Blocked (PIB) Solely Pursuant to E.O. 13599 - Treasury Department: The PIB List includes persons identified by OFAC as meeting the definition of the term Government of Iran or the term Iranian financial institution as set forth in, respectively, sections 560.304 and 560.324 of the ITSR. Pursuant to Executive Order 13599, the property and interests in property of persons included on this list, as well as property such as vessels identified on this list, must be blocked if they are in or come within the United States or if they are in or come within the possession or control of a U.S. person, wherever located.