



## EXPORT CONTROLS PROCEDURES

<b>Title: Restricted Party Screening in Virtual Compliance</b>		
<b>Procedure #:</b> EC001	<b>Effective Date:</b> 06/13/2018	<b>Author:</b> Todd Wakeland
<p><b>Purpose/Definitions:</b> The U.S. government restricts the University from exporting any service or product to any party listed in a U.S. government export denial, blocked, or debarred persons lists. The failure to comply with the above regulation is a violation of U.S. law and can result in criminal or civil prosecution, as well as denial of export privileges.</p> <p><b>Procedure:</b></p> <ol style="list-style-type: none"><li>1. Go to <a href="http://www.visualcompliance.com">www.visualcompliance.com</a></li><li>2. Login with your username and password</li><li>3. Click the RPS tab, enter the following information:<ol style="list-style-type: none"><li>a. Company name (also put company name in the comments box, see directions below)</li><li>b. After you screen the company name, delete that name and then go to the individual name First, Middle (or initial), Last and enter it exactly as received.</li><li>c. Any address information you have</li><li>d. Country of birth (if available)</li></ol></li><li>4. Click in the empty box next to the Comment box and add the reason you are screening the company or individual. For example: NIAR tour/ Professor Proton or person requesting the tour/ ABC Engineering Company or name of the group touring. Any information that may be needed to review the file if a hit is received in the future.</li></ol> <p><b>Note:</b> If you have multiple names to screen you can click on the “Search Same Keywords Again” after you have completed the first screening so you do not have to retype all the above information again.</p>		

5. Select the Fuzzy Level 2 search option and click “Screen”
6. If the search brings back a result of "**No Matching Records Found**", email the result to yourself by using the, “Email these results” button; then proceed with your normal course of business.
7. If the search returns any results other than "No Matching Records Found" (a hit), further investigation is required; if you did not have a middle name for the individual, request one and add it to your original search. If your search still shows “a hit”, pass the information on to the Director of Export Controls. To initiate the review, click “Email these results” and send to [twakela@siue.edu](mailto:twakela@siue.edu). At this point, the project is on hold and the screener must wait for approval from the Director of Export Controls before continuing.

#### **HITS:**

**False Hits:** These are hits that after evaluation are determined to be low risk; most commonly because the individual being screened is not the same individual showing up as restricted. This occurs frequently for individuals with common first and/or last names. When evaluating a situation keep in mind the purpose of the scan (what the person will be doing) and the reason the person is showing up in Visual Compliance. Approval is granted by the Director of Export Controls to allow the requestor to move forward with their request if considered a low risk. For hits that are quickly and easily determined to be a false hit, no additional documentation is required other than the above email in procedure 6.

**Not Enough Data:** If, after exhausting all research possibilities, it cannot be verified whether or not it is a positive hit the following steps will be taken:

- a. The individual will be asked to sign a verification statement that he or she is not on an excluded, debarred, blocked, wanted or otherwise prohibited entity list.
- b. Obtain a copy of the individual’s passport, driver’s license, or visa;
- c. All copies of relevant communications, signed verification statement and personal identification documents will be filed in the “RPS-Restricted Party Screening Info – Hit Documentation” file within the Director of Export Controls Office;
- d. Proceed with the transaction

If the individual is unwilling or unable to provide the required documentation to assist the Southern Illinois University System (SIU-S) in verifying he or she is not a restricted party individual, then the activity shall be terminated.

NOTE: In special circumstances, the Associate Provost for Research, the Vice Chancellor for Research or the Associate Dean for Research, may authorize the

Research to proceed without the verification statement and/or personal identification document. In such cases, written authorization will be stored in the "Hit Documentation" file as documentation.

**Positive Hits:** If, after verification, it is determined to be a positive hit, the person that searched the matter, will notify the Director of Export Controls. The original requester will also be notified and a discussion will be held to address the matter and determine next steps. In these cases, General Counsel may be involved in the discussion process.

Any companies or individuals who are confirmed as a positive hit will be excluded from conducting **any** business with SIU-S. This restriction applies regardless of funding source (if any).

The Director of Export Controls will create a file on the Person or Company that had a positive hit or false hit stating how that conclusion was reached.

**WHEN TO SCREEN:**

All:	When shipping
HR:	Before hiring anyone
Contracts:	Before replying/sending any correspondence for the first time
	Whenever there is a change in people on or involved with project
PI:	Before replying/sending any correspondence for the first time
	Whenever there is a change in people on or involved with project
Pre-Award:	Before replying/sending any correspondence for the first time
	Whenever there is a change in people on or involved with project
Post-Award:	Before replying/sending any correspondence for the first time
	Whenever there is a change in people on or involved with project
Compliance:	When a request is received for visitors or tour participants to be screened
	When verifying a possible hit
	Whenever it is otherwise required
Purchasing:	When submitting RFP's or making a first time purchase from a vendor

