

# Restricted Party Screening

## FAQs

### Visual Compliance

#### A. Why Do We Conduct Screening?

Stanford is responsible for ensuring that we do not unlawfully engage with persons or organizations who may jeopardize compliance with U.S. export controls and trade sanctions regulations, and for documenting our due diligence when complying with those regulations. A U.S. Government export license may be required before proceeding with a collaboration, appointment, or financial transaction when persons or organizations are:

- On a list of companies or individuals restricted from receiving U.S. items, technology, software or services (“Entity List”).
- Restricted from receiving some or all items subject to the U.S. Export Regulations unless the exporter secures a license (“End Use/End User”).
- Owned or controlled by, or acting for or on behalf of, sanctioned or embargoed countries.
- Subject to trade and financial sanctions ("Specially Designated Nationals and Blocked Persons").
- Convicted of violating or conspiracy to violate the Arms Export Control Act ("Debarred Parties").

Additionally, Restricted Party Screening is used to identify persons and organizations that may present an elevated risk of undue foreign influence.

#### B. Who Should Be Screened?

- International collaborators: Individuals and Organizations
- International visitors including: Visiting Scholars, Visiting Faculty (VS and OTS), Visiting Postdocs, Visiting Teaching Staff
- Industrial affiliates
- Recipients of international shipments: Individuals and Organizations
- International funders – Individuals and Organizations

#### C. Who Should Conduct Restricted Party Screening?

Stanford personnel with a legitimate business need, including individuals responsible for:

- Hiring and appointments (DFO/DFA, HR, student services officers)
- Managing research activity (research administrators)
- Negotiating and signing agreements which include international parties (e.g. ORA, ICO, RMG, OOD, Procurement)
- Processing gift/affiliate payments from international donors (development officers, affiliates program managers)
- Handling international shipments

#### D. What is Visual Compliance?

Visual Compliance is an on-line Restricted Party Screening data base accessed remotely through Descartes' Visual Compliance portal. It is one of the most broadly adopted Restricted Party Screening

tools across higher education in the United States. As the data base is accessed remotely, there is no software to download.

#### E. Do I Need to Register for a Visual Compliance Account to Conduct Restricted Party Screening?

Each School/Unit has a designated point of contact (“Division Manager”) who can assist with Visual Compliance system registration. If you will have a business need to conduct Restricted Party Screenings, please contact your School/Unit’s Division Manager to request access. The School/Unit Division Manager contacts are listed on the [DoResearch RPS Page](#).

#### F. How Do I Conduct a Screen?

1. Obtain RPS account authorization from your Division Manager
2. Log in to [Visual Compliance](#)
3. Select the “Restricted Party Screening” link
4. Complete as many fields as you can, including the street address of the person and organization, to improve the accuracy of the screen. A higher alert level means more matched information.
  - **At a minimum, the name of the individual, the name of the organization with which the person is affiliated, and the country should be entered.** These search criteria can all be entered at the same time.
  - **Note:** You may consider retaining a copy of the screen result for documentation purposes based on the business needs of your unit.
5. The search criteria are set to default to “Fuzzy 2” with Stemming and Thesaurus off, and Business Word removal and Field Specific set to On
6. A brief, two-minute tutorial on how to conduct a basic search (Lesson 1) can be found on the Visual Compliance RPS Training Page [here](#).

#### G. How Do I Know If My Screen Result is Negative?

You will see “No Matching Records Found” at the very top of the page.

#### H. What Do I Need To Do If I See A Country Alert?

Although a result may return “No Matching Records Found,” users having selected a country in the drop-down menu may see the phrase “Sanctions, embargoes or risk alerts apply to the country supplied for this entity”. A risk matrix will be found under “Country Notes”. **These country risks only apply to international shipments and transfers of export-controlled technology. The country-specific alerts may be disregarded for person/entity screens if those exports or transfers do not apply.** If they apply, consult [Stanford’s Export Controls Decision Tree](#).

#### I. How Do I Know There Is a Screen Match and What Happens?

1. When a positive screen result is found:
  - the “Search Type” row will show “returned x # of results” and
  - you will see highlighted data in the screen result cells.
2. Click each hyperlink in the Reference column in the search result.
3. A separate window with RPS Details opens.
4. Save the RPS Details of each “Reference” as a PDF by clicking the PDF option at the bottom of each window. Merge the PDFs into one file. **Note: contact your Division Manager if the number of matches is greater than 10.** The Division Manager may then wish to replicate the screen so that the Division Manager can have direct access to the multiple results, thus reducing administrative burden on the original screener.

5. Escalate the search results to the Division Manager by forwarding the PDF file.
6. Provide the Division Manager additional information such as whether you believe this to be a true positive or false-positive result. For example, if the search result shows a name match but the person in question is in their 30's, and the person in the search result was born 1950, inform the Division Manager about the age discrepancy.
7. The Division Manager reviews the RPS Details.
8. If determined to be a false-positive result, the Division Manager informs the user to proceed.
9. If determined to be a true-positive result, the Division Manager contacts the Director of Export Compliance.
10. The Director of Export Compliance reviews the information, conducts an export licensing assessment, and provides guidance to the Division Manager on how the activity can move forward in an export compliant manner.
11. If the result is determined to be a true-positive and **the List ID includes "GERP Review," escalate to the Division Manager per Steps 3-4 above. The Division Manager will forward the PDF file to the Global Engagement Review Program Director (GERP).** The GERP director will review the activity and provide a risk analysis and recommendations to the Division Manager and other interested parties if warranted. In rare cases, the GERP director may escalate review of the activity pursuant to the GERP process.
12. The Division Manager communicates next steps to the user.

**NOTE:** User = The Department or Program Level individual who conducted the initial search.  
 Division Manager = the School Level or Central Office Level representative.

#### J. What Is the Dynamic Screening Alert Email That I Might Receive?

Visual Compliance rescreens all previously screened persons and entities against US Restricted Party Lists. The Visual Compliance Dynamic Screening Function automatically rescreens previously screened persons and entities whenever the government updates Restricted Party Lists. Visual Compliance sends an email alert to the screener and the Division Manager to inform them of new matches due to changes, including additions, to sanctions lists.

- The RPS Dynamic Screening Alert email will include the:
    - Original search data such as:
      - Name of the screener
      - The date of the original screen
      - The time of the screen
      - Person/Entity screened
    - Alert data (all the above, including):
      - Alert Type (Flag Level)
      - Match Reference Number w/link to match details
      - Source (List Matched)
1. Users need to review the "RPS Dynamic Screening Alert" results and consult with the Division Manager to determine and agree if there is a true match.
    - Note: Because of periodic updates to US sanctions lists, a person or organization may appear repeatedly over time. As a best practice, users should continue to consult with their Division Manager to evaluate compliance risk.
  2. If there is 1) a true match, 2) the "RPS Dynamic Screening Alert" results include the term "GERP Review" and 3) the Stanford engagement with the organization or individual is still active, consult with the GERP Director.
    - The GERP director will then review the activity and provide a risk analysis and recommendations to the Division Manager and other interested parties if warranted. In

rare cases, the GERP director may escalate review of the activity pursuant to the GERP process

3. If there is 1) a true match, 2) the “RPS Dynamic Screening Alert” results do not include the term “GERP Review” and 3) the Stanford engagement with the organization or individual is still active, consult with the Director of Export Compliance who will conduct an export licensing risk assessment so that the activity can move forward in an export compliant manner.