

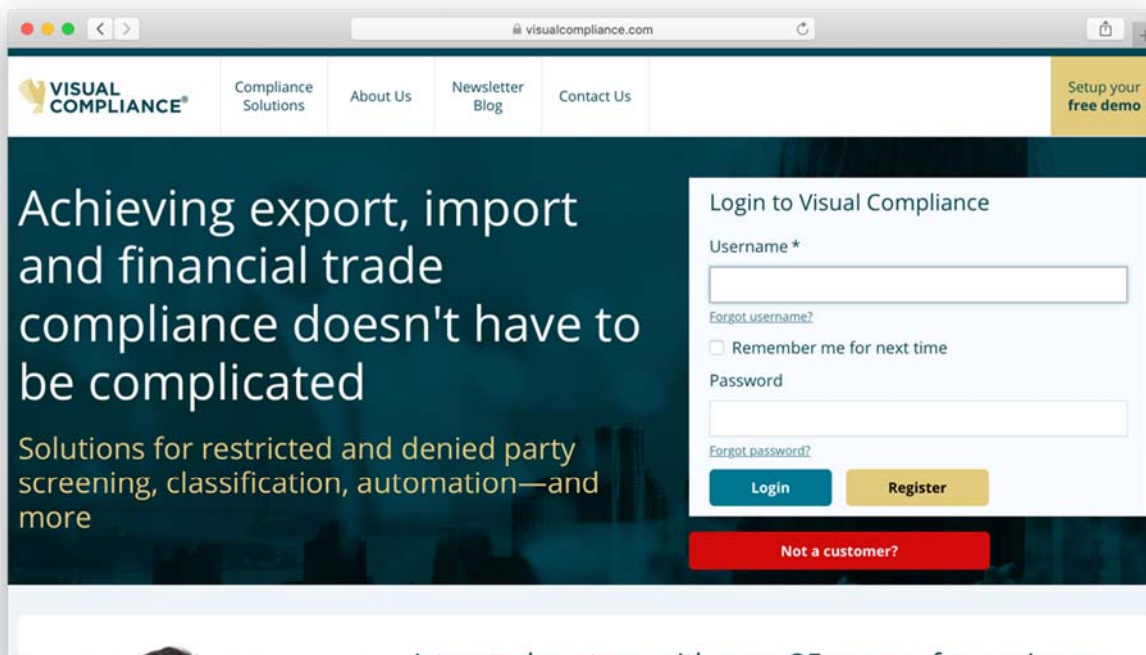
RESTRICTED PARTY SCREENING GUIDE

Within the UC System, we use Visual Compliance to perform Restricted Party Screenings to ensure we are not interacting with restricted, denied, or debarred parties in violation of United States Law. Examples could be weapons proliferators, terrorists, drug traffickers, and export control violators.

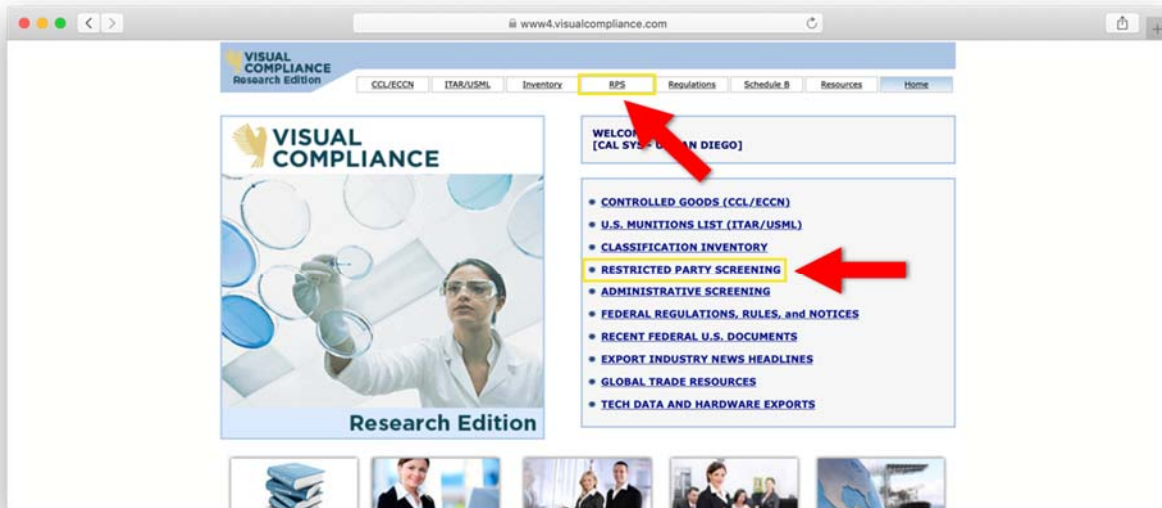
Without proper authorization such as an export license, the government prohibits U.S. individuals and organizations from collaborating with or providing materials, services, and financial support to these restricted parties. Various agencies within the U.S. Government maintain lists of restricted parties 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

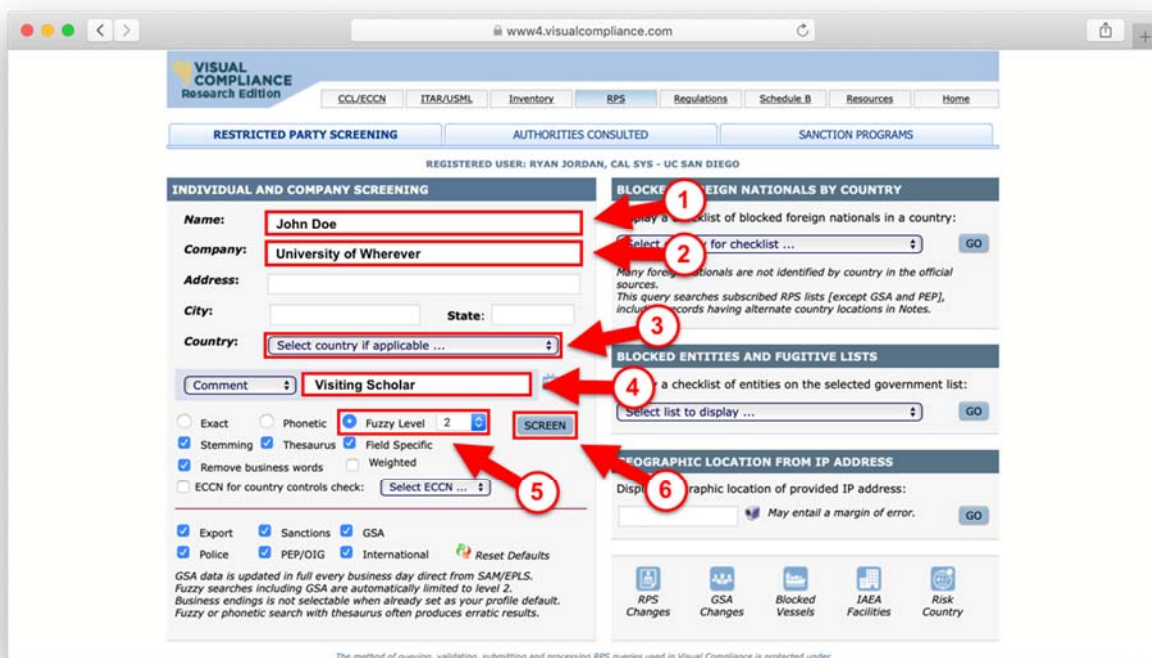
All UC employees can register for an account with Visual Compliance to perform Restricted Party Screenings. To register for an account, visit <https://www.visualcompliance.com/usr> and complete the steps listed. **Please be sure to use your @ucsd.edu email address.** Once registered, log into Visual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



NAVIGATE TO RESTRICTED PARTY SCREENING TOOL



PERFORMING A RESTRICTED PARTY SCREENING



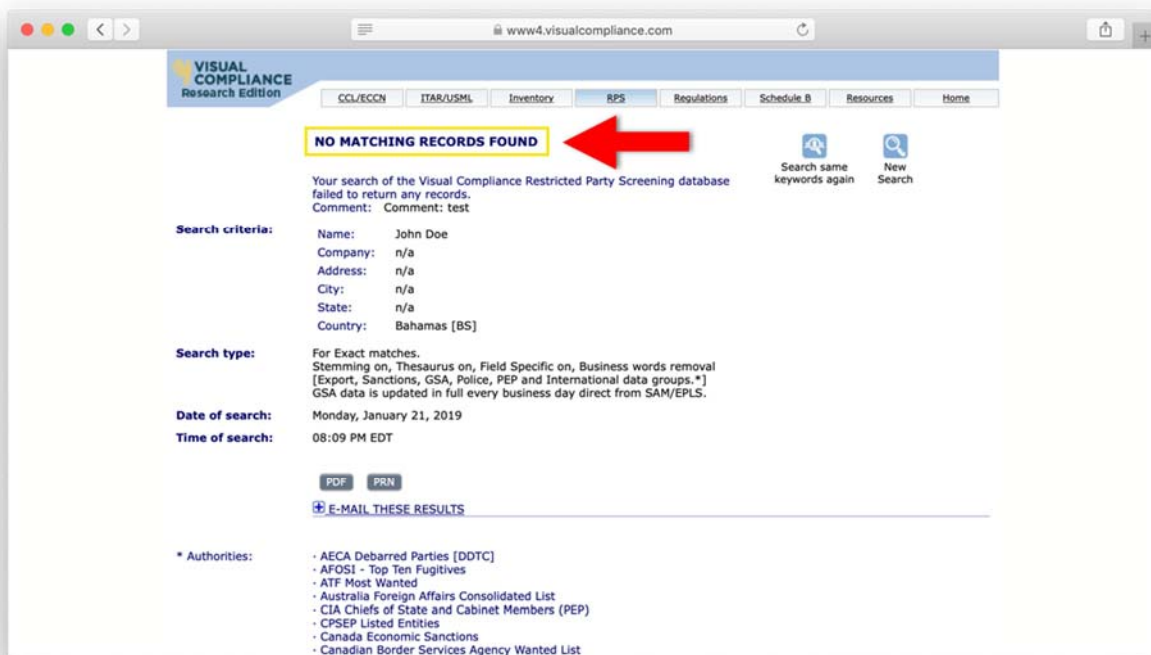
Whenever possible, screen for the person's name and their organization together in the same screening. If screening only one, it is ok to leave the other blank.

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 San Diego" instead of "UCSD".

3. **Country** – Enter the home country for the individual or company. If you know of multiple countries, please run multiple screenings.
4. **Comment** – Enter your department, PI, and reason for screening (shipment, payment, visiting scholar, etc.). If you are performing test or practice screenings, please include the word “test” in the comment field so the screening can be removed from the audit record.
5. **Search Settings** – Please use “Fuzzy Level 2”.
6. **Screen** – Click the “screen” button to perform the Restricted Party Screening.

NO MATCHES FOUND

If your screening produces no matching records like show below, and the person/organization you screened is not from Cuba, Iran, Syria, Sudan, or North Korea, 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 (export@ucsd.edu) for a review.



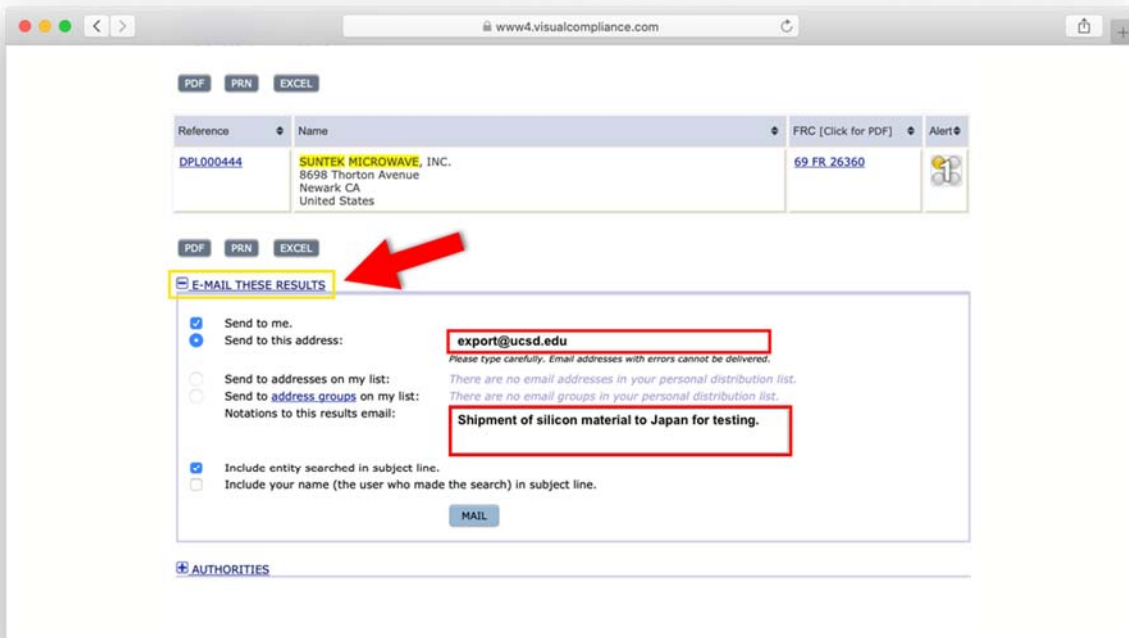
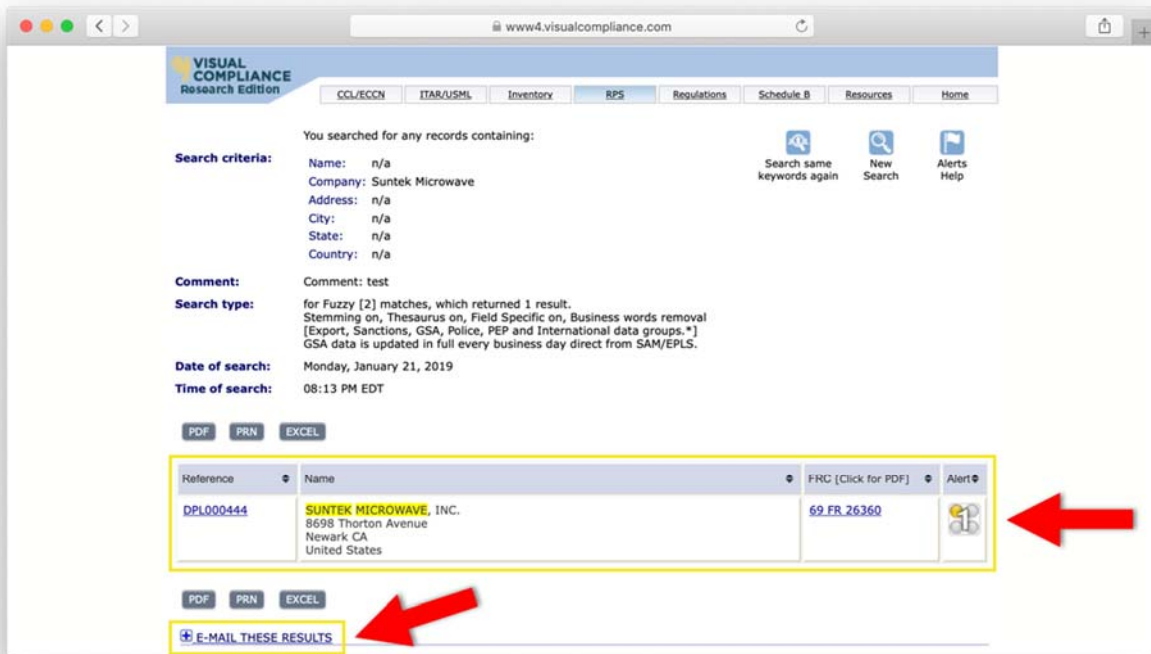
MATCHES FOUND



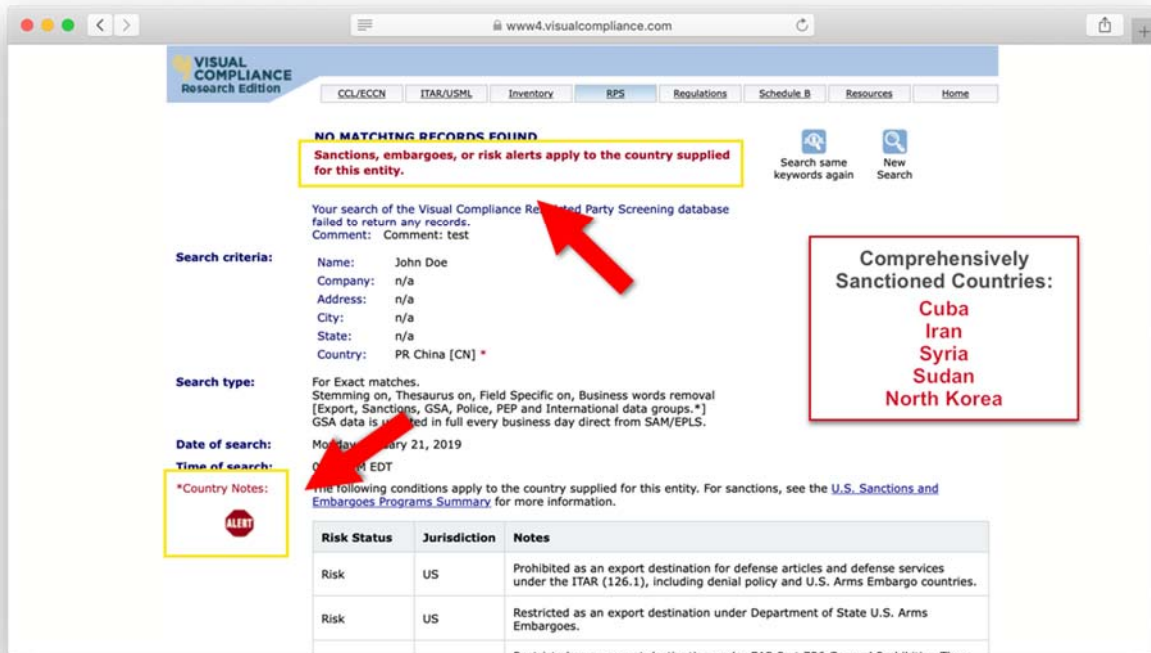
the transaction

& escalate the screening to the Export Control Office

If your screening produces any matches, you need to **PAUSE** the transaction and escalate the screening to the Export Control Office by clicking on “E-MAIL THESE RESULTS”, and sending to export@ucsd.edu. Please make sure to include the reason why you performed the screening, such as visiting scholar, shipment or purchase. 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.**



COUNTRY ALERTS



COUNTRY ALERT FOR CUBA, IRAN, SYRIA, SUDAN¹, OR NORTH KOREA

If your screening does not produce a match, but does produce a country alert for Cuba, Iran, Syria, Sudan or North Korea (comprehensively sanctioned countries), you must escalate your screening to export@ucsd.edu for review. **It is likely an export license is required for any activities involving these countries or their nationals.**

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, and your transaction is for a visitor, visiting scholar, or payment, you are clear to 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 (export@ucsd.edu) for a review.**

¹ While Sudan is not a comprehensively sanctioned country, there are stringent export control regulations in place.

OTHER SEARCH SETTINGS (FROM VISUALCOMPLIANCE.COM)

- **Fuzzy Level** - A fuzzy search finds words that are similar, but with misspellings, such as "Saddam Hussein" for "Saddam Hussain". Search fuzziness can be adjusted from 1 to 4. An additional setting "D" standard for Dynamic Fuzzy, and will select the best fuzzy level for your search, based on the length and complexity of the search string entered. Fuzzy search does not substitute the first letter of the word, otherwise results could be unlimited. Therefore "Qadafi" does not find "Kadafi". Fuzzy does not expand abbreviations, such as "Manufacturing" for "Mfg". In this example, the three letter word ("Mfg") will not be suspected to be a misspelling of a 13 letter word ("Manufacturing").
- **Phonetic** - Phonetic search finds matches that "sound" like the keywords supplied, for all words supplied, like "Smythe" in a search for "Smith." Note that phonetic, which uses the universal "Soundex" algorithm, does not substitute first characters, so 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. Phonetic search does not, in general, work effectively with Thesaurus selected. Using Thesaurus, sound-a-likes are found for synonyms not visible to the user, often producing confusing results. The Thesaurus check box is automatically cleared when the button for Phonetic search is selected.
- **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. For example, a search for the word "apply," also finds the words "applies," "applied," and "applying."
- **Thesaurus** – This will search for synonym values for geographic place names (United Kingdom, Great Britain, England, U.K.) and for proper names (Bob, Rob, Robert, Bobby, Robby). Thesaurus is not recommended for use with Fuzzy or Phonetic search. The Thesaurus check box is automatically cleared when the button for Phonetic search is selected.
- **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. De-selecting searches the keywords supplied in Notes, in addition to 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. A search for "Acme Welding Limited" will not match if the official government form is "Acme Welding Inc." Removing business words equates the two expressions
- **ECCN for country controls check** – Selecting this option with an ECCN number runs that number through the Commerce Country Chart license determination evaluation for the country entered for the RPS search. We recommend ignoring this feature.

SCREENING TIPS (FROM VISUALCOMPLAINCE.COM)

- The Visual Compliance search engine examines the keywords you supply as a group. A search for “Acme Welding of Boston” will not find “Acme Welding” because “of Boston” does not appear in the target record. The search engine will only reveal results containing all the words supplied in the search. (The cluster of keywords supplied cannot be shortened by the search engine; otherwise, screening for “John Smithson”, for instance, would return everyone in the database name John. The search engine finds matches for all words in any order, searching within 10 words. Therefore, if you mix up the words of a company name or are missing a word (for example, entering “American Trading Technology Group” or “American Trading Group” instead of “American Technology Trading Group”), the match will still be returned in the results. Again, if a word supplied is not part of the entry (entering “American Trading Technology Partners” for instance), a match will not be returned.
- Street address information very rarely matches and does not generally improve results quality. Be strategic about your searches when you can, the same as you are using Google or eBay.
- The RPS system does not recognize characters such as “ # % * ~ ? or foreign languages in Unicode. Ampersands (&) are sometimes problematic. Avoid pasting from word processors such as Microsoft Word because invisible machine codes can be transferred along with the displayed characters. As well, accented foreign characters (e.g. è ó û ñ ÿ) and Unicode are not used in official U.S. government sources, including those in names, as in French, German, and other languages. They are removed in searches by the RPS search engine. Company names including internet addresses, (e.g. mywebsite.com Inc.) can be difficult to match especially when searching the GSA list.
- Acronyms, abbreviations, and single characters are not, in general, valid search criteria, but may arise in names or abbreviations and acronyms (e.g. “W P Smith” or “A B C Consulting”). For best results, use periods in names (“W.P. Smith”) and close up abbreviations acronyms (“ABC Consulting”) to avoid single character search problems, or other mismatches. A large number of search failures or excessive results reports come as a result of single characters included in the keywords you search. Government agencies tend to use the legal form and spell names out in full; therefore, avoid abbreviations and acronyms whenever you can. For example, search for “Acme Welding Company” instead of “AWC” (or better yet, just “Acme Welding”).

UC San Diego
Export Control Office
(858) 246-3300
export@ucsd.edu
<http://export.ucsd.edu>