



Export Compliance Plan Standard Operating Procedure (SOP) Restricted Party Screening (RPS) End-Use & End-User Checks	
Document Number:	ECP-20210110-SOP4
Issue Date:	10/04/2021
Revision Date:	09/10/2025

INTRODUCTION

This Standard Operating Procedure (“SOP”) outlines the processes used to foster a culture of compliance with U.S. Export Controls¹ and the University of California - Policy on Export Control (“Export Control Policy”)². This SOP is in furtherance of the local Export Compliance Program Plan (“ECP”) maintained and regularly reviewed and updated by the campus Export Control Office.

PURPOSE AND SCOPE

The purpose of this SOP is to:

- Define Restricted Party Screening, its importance and when it is required.
- Identify roles and responsibilities in performing Restricted Party Screening.
- Identify the tools available to perform Restricted Party Screen and how to register with Visual Compliance.
- Outline general steps on how to perform Restricted Party Screening, review results and when to escalate positive matches.
- Identify where to obtain additional training materials and resources.

RESTRICTED PARTY SCREENING

What is it?

Restricted Party Screening (“RPS”) is a process used to identify whether an individual, organization or entity (e.g., business, corporation, institution etc.) involved in the activity or transaction are found on a U.S. Government debarred, denied or sanctioned list, collectively referred to as “restricted parties.”

NOTE: Restricted parties may also include universities and other research institutions.

Why is it important?

The importance of RPS is to ensure that exporters are not conducting business with a restricted party—be it an individual, organization or entity. Additionally, RPS can also be used to ensure that exporters are not engaging in international activities or transactions with parties located in a sanctioned or embargoed country or country of concern (e.g., Cuba, Iran, North Korea, Syria, Russia, Belarus or Ukraine³), without the proper authorization, such as an export license.

When is it required?

¹ U.S. Export Controls include without limitation the Export Administration Regulations (“EAR”), International Traffic in Arms Regulations (“ITAR”), and regulations and orders administered by the Treasury Department’s Office of Foreign Assets Control (“OFAC”)

² University of California – Policy on Export Control dated June 21, 2018, as amended. <https://policy.ucop.edu/doc/2000676/ExportControl>

³ Refer to U.S. Department of Treasury Sanctions Programs and Country Information for current listings: <https://home.treasury.gov/policy-issues/financial-sanctions/sanctions-programs-and-country-information>



Export Compliance Plan Standard Operating Procedure (SOP) Restricted Party Screening (RPS) End-Use & End-User Checks	
Document Number:	ECP-20210110-SOP4
Issue Date:	10/04/2021
Revision Date:	09/10/2025

As a standard practice, RPS should take place at first contact, prior to the export, reexport, transfer or financial transaction taking place and should be performed for all international activities⁴. RPS should include every party involved in the transaction, including the end user, affiliated entity for international scholars and collaborators and any of the parties involved in throughout the transaction, including partner resources such as supercomputing centers.

The following are examples of activities to which an RPS must be performed:

- Foreign collaborations (e.g., visitors, visiting scholars & postdocs)
- International shipments, whether physically shipped, hand-carried or electronically transferred
- Financial transactions (e.g., Paying foreign persons or parties for purchases, travel, reimbursement, etc.)
- Awards or agreements with foreign parties (e.g., contracts/grants, MOU's, NDA's, CDA's, sales and service, subawards)
- International Scholar vetting
- Gifts and donations

ROLES AND RESPONSIBILITIES

General

As promulgated under the Export Control Policy, compliance with export controls is a shared responsibility. As the exporter, we have a responsibility to know who we are conducting business with, as engagements with international parties appearing on one of several U.S. Government debarred, denied or sanctioned lists carry specific regulatory requirements and certain individuals and organizations are prohibited from receiving U.S. exports, while others may only receive goods and services if they have been licensed, even items that do not normally require a license based on their export classification.

Therefore, before entering any international activity or transaction, RPS must be performed to assess whether the parties involved are a restricted party; and determine, with the support of the Export Control Office, if the proposed activity or transaction is authorized, or if approval is required from the relevant government agency.

See Appendix D – RPS Roles and Responsibilities for a list of Departments (Offices) and Activity.

⁴ Domestic transactions and activities should be evaluated using a risk-based approach



Export Compliance Plan Standard Operating Procedure (SOP) Restricted Party Screening (RPS) End-Use & End-User Checks	
Document Number:	ECP-20210110-SOP4
Issue Date:	10/04/2021
Revision Date:	09/10/2025

TOOLS FOR RESTRICTED PARTY SCREENING

Within the UC System, the tool used to perform RPS is Descartes Visual Compliance. Visual Compliance is a web-based tool and is made available for use by all UC campuses. UCR faculty, staff, and students involved in export activities or transactions can self-register for a Visual Compliance account using the steps outlined below.

Step 1. To register for an account, visit <https://www.visualcompliance.com/usr> and fill in the required information. You will first be asked to provide and confirm your email address. Once you have completed this step, a confirmation email from 'accountmgmt@visualcompliance.com' will be sent to the email address you provided. If you do not receive this email confirmation, please check your junk, or spam folder. If you do not receive a confirmation email within 24 hours, please contact the Export Control Office for assistance.

Step 2. Upon receipt of your confirmation email, please open and click on the link 'Complete Account Registration' to enter the required information. NOTE: When entering the required information, please be sure to use standard characters and avoid accented characters. When asked to identify your division or segment, if you are unsure of which selection to enter, please contact the Export Control Office for assistance. After the required information is filled in, click 'Submit' to complete your registration. You will receive an e-mail confirming successful self-registration. If you do not receive this email confirmation, please check your junk, or spam folder. If you do not receive a confirmation email within 24 hours, please contact the Export Control Office for assistance.

Step 3. Once your registration is complete, to access Visual Compliance's Restricted Party Screening tool, visit <https://www.visualcompliance.com> and enter your Username and Password. NOTE: Your Username is your full email address, and your Password is that which you created when registering.

To reset your Password at any time, visit the Visual Compliance website at <https://www.visualcompliance.com>. Click on "Forgot your password?", enter your e-mail address and password rest instruction will be emailed to you.

Export Compliance Plan Standard Operating Procedure (SOP) Restricted Party Screening (RPS) End-Use & End-User Checks	
Document Number:	ECP-20210110-SOP4
Issue Date:	10/04/2021
Revision Date:	09/10/2025

LOGON TO VISUAL COMPLIANCE

Once your account has been created, logon to Visual Compliance at <https://www.visualcompliance.com/> and navigate to the Restricted Party Screening tool as follows:

Export Compliance Plan Standard Operating Procedure (SOP) Restricted Party Screening (RPS) End-Use & End-User Checks	
Document Number:	ECP-20210110-SOP4
Issue Date:	10/04/2021
Revision Date:	09/10/2025

PERFORMING A RESTRICTED PARTY SCREENING

The following steps are provided to assist UCR Members with performing initial RPS in Visual Compliance.

- 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 U.S. Government restricted party lists.
- Company** – If screening an external company, organization, or institution, enter the complete name and not the acronym. For example, if you were screening UCR, you would enter “University of California Riverside”.
NOTE: Whenever possible, screen for the person’s name and their organization separately. When screening only one, it is ok to leave the other blank.
- Address** – This information is optional, however, if known, providing will assist in narrowing false positive results.
- Country** – Enter the home country for the individual or company. If you know of multiple countries, please run multiple screenings.
- Comment** – Enter your department, PI, and/or reason for screening. If you are performing test or practice screenings, please include the word “test” in the comment field so the screening can be removed from future screening.
- Search Settings** – Please use “Fuzzy Level 2”.
- Screen** – Click the “screen” button to perform the RPS.

The screenshot displays the 'Descartes Visual Compliance Research Edition' interface. At the top, there is a navigation bar with tabs for 'CCL/ECCN', 'ITAR/USML', 'Inventory', 'RPS', 'Regulations', 'Schedule B', 'Resources', and 'Home'. Below this is a secondary navigation bar with 'RESTRICTED PARTY SCREENING', 'AUTHORITIES CONSULTED', and 'SANCTION PROGRAMS'. The main content area is titled 'INDIVIDUAL AND COMPANY SCREENING' and contains several input fields: 'Name' (1), 'Company' (2), 'Address' (3), 'City' and 'State' (4), and 'Country' (4). A 'Comment' field (5) is also present. Search settings include 'Exact', 'Phonetic', 'Stemming', 'Thesaurus', 'Fuzzy Level' (set to 2), and 'Field Specific' (checked). A 'SCREEN' button (7) is located at the bottom right of the form. Below the form, there are checkboxes for 'Remove business words' and 'ECCN for country controls check'. At the bottom, there are checkboxes for 'Export', 'Sanctions', 'GSA', 'Police', 'PEP/OIG', and 'International', along with a 'Reset Defaults' button. A footer note states: 'GSA data is updated in full every business day direct from SAM/EPLS. Business endings is not selectable when already set as your profile default. Fuzzy or phonetic search with thesaurus often produces erratic results.' On the right side of the interface, there are sections for 'BLOCKED FOREIGN NATIONALS BY COUNTRY', 'BLOCKED ENTITIES AND FUGITIVE LISTS', and 'GEOGRAPHIC LOCATION FROM IP ADDRESS'. At the bottom right, there are icons for 'RPS Changes', 'GSA Changes', 'Blocked Vessels', 'IAEA Facilities', and 'Risk Country'.

Export Compliance Plan Standard Operating Procedure (SOP) Restricted Party Screening (RPS) End-Use & End-User Checks	
Document Number:	ECP-20210110-SOP4
Issue Date:	10/04/2021
Revision Date:	09/10/2025

REVIEWING RESTRICTED PARTY SCREENING RESULTS

The following information is provided to assist UCR Members with initial RPS reviews and determine when to escalate the RPS results to the Export Control Office for assistance.

RPS Result 1: NO MATCHING RECORDS FOUND

Evaluate: If your screening produces no matching records, as shown below, and the person/organization you screened is not located in a restricted country, you may proceed with your transaction. Please save your RPS record in accordance with the recordkeeping section of this SOP.

Escalate: If your transaction involves a shipment or another type of transfer of items or information, please contact the Export Control Office to determine any applicable licensing requirements for the physical item(s).

The screenshot shows the Descartes Visual Compliance Research Edition interface. The top navigation bar includes 'Log Off' and tabs for 'CCL/ECCN', 'ITAR/USML', 'Inventory', 'RPS', 'Regulations', 'Schedule B', 'Resources', and 'Home'. A blue arrow points to the 'NO MATCHING RECORDS FOUND' message. The search criteria are: Name: n/a, Company: University of Toronto, Address: n/a, City: n/a, State: n/a, Country: Canada [CA]. The search type is 'For Fuzzy [2] matches. Field Specific on, Business words removal [Export, Sanctions, GSA, Police, PEP and International data groups.*]'. The date of search is Friday, February 26, 2021, and the time is 08:15 PM UTC. There are two buttons: 'Search same keywords again' and 'New Search'.

Export Compliance Plan Standard Operating Procedure (SOP) Restricted Party Screening (RPS) End-Use & End-User Checks	
Document Number:	ECP-20210110-SOP4
Issue Date:	10/04/2021
Revision Date:	09/10/2025

RPS Result 2: COUNTRY NOTES: ALERT

Evaluate: If your screening produces no matching records, BUT indicates that **'Sanctions, embargoes, or risk alerts apply to the country supplied for this entity.'**, as shown below, you will need to PAUSE the transaction and escalate the RPS result to the Export Control Office for review.

Escalate: When escalating to the Export Control Office, please make sure to include the reason why you performed the screening. The Export Control Office will review the screening and evaluate if an export license is required. Do not proceed with the transaction until the Export Control Office indicates the transaction is clear to proceed.

NO MATCHING RECORDS FOUND
Sanctions, embargoes, or risk alerts apply to the country supplied for this entity.

Your search of the Descartes Visual Compliance Restricted Party Screening database failed to return any records.

Search criteria:
 Name: n/a
 Company: Universidad de la Habana
 Address: n/a
 City: n/a
 State: n/a
 Country: Cuba [CU] *

Search type:
 For Fuzzy [2] matches.
 Field Specific on, Business words removal
 [Export, Sanctions, GSA, Police, PEP and International data groups.*]
 GSA data is updated in full every business day direct from SAM/EPLS.

Date of search: Friday, February 26, 2021
Time of search: 08:11 PM UTC

*Country Notes: The following conditions apply to the country supplied for this entity. For sanctions, see the [U.S. Sanctions and Embargoes Programs Summary](#) for more information.

Risk Status	Jurisdiction	Notes
Risk	US	Prohibited as an export destination for defense articles and defense services under the ITAR (126.1), including denial policy and U.S. Arms Embargo countries.
Risk	US	Restricted as an export destination under Department of State U.S. Arms Embargoes.
Risk	US	Restricted as an export destination under EAR Part 736 General Prohibition Eight (In transit shipments and items to be unladen from vessels or aircraft).
Risk	US	Restricted as an export destination under EAR Part 736 General Prohibition Three (Foreign-produced direct product re-exports).
Risk	US	Restricted as an export destination under Office of Foreign Assets Control (OFAC) Sanctions, or to Specially Designated Nationals under OFAC Sanctions. General Licenses may apply.
Risk	US	Subject to a comprehensive general embargo under EAR Part 746, Embargoes and Other Special Controls, or EAR Part 740 Country Group E:2, Unilateral Embargo.
Risk	US	U.S. Department of State, Countries Not Cooperating Fully with United States Antiterrorism Efforts.
Risk	US	U.S. Department of State, State Sponsors of Terrorism.
Risk	US	Restricted as an export destination under EAR Part 736 General Prohibition Three (Foreign-produced direct product re-exports) for ECCN 0A919 and 9x515 or *600 series' items in the Commerce Control List.



Export Compliance Plan Standard Operating Procedure (SOP) Restricted Party Screening (RPS) End-Use & End-User Checks	
Document Number:	ECP-20210110-SOP4
Issue Date:	10/04/2021
Revision Date:	09/10/2025

RPS Result 3: END-USE & END-USER ALERTS

Evaluate: If your screening produces an end-use or end-user alert, as shown below, you will need to PAUSE the transaction and escalate the RPS result to the Export Control Office for review. However, before escalating the RPS result to the Export Control Office, the following actions may be taken to help facilitate review and assist in narrowing false positive results.

- Perform a second RPS but change the Search Settings from ‘Fuzzy Level’ to ‘Exact’
- If you still receive RPS alert, review the details of the alert.

Alert Level 1 – means the Name or Company entered have been found. Populating one search field can only generate an Alert Level 1. To rule out a false-positive, double check the Name or Company you have screened. If an exact match, please escalate to the Export Control Office for review. If no exact match, you may proceed.

Alert Level 2 – means two of the four possible elements have been found. To rule out a false-positive, compare the information you have screened against the RPS Details and Reference number (see below). If an exact match, please escalate to the Export Control Office for review. If no exact match, you may proceed.

Alert Level 3 – means three of the four possible search elements have been found. Please escalate to the Export Control Office for review, as an export license may be required before proceeding.

Alert Level 4 – means all four search elements (Name, Company, Location and Country) have been found. Please escalate to the Export Control Office for review, as an export license may be required before proceeding.

Country Notes Alert – will appear whenever an RPS is performed for an individual or organization located in a potentially high-risk country. Use this as your cue to be extra diligent regarding a specific transaction.

NOTE: RPS alert levels range from numbers one through four and are tied to the number of search criteria entered that Visual Compliance matched on. The four possible elements to match on are Name, Company, Location and Country. Location is comprised of address, city, and state. If both City and State are provided in the search, both must match for the alert to be upgraded. Keep in mind the alert levels are not related to the severity of the debarment. The alerts you see on the results indicate the closeness of the match. So, an alert level 4 bears closer scrutiny than an alert level 1.

Escalate: Some matches are quite easy to ascertain if they are genuine or not. For some others, you might have to dig a little deeper. With each RPS result, you can click on the Reference number (see below) to find more details about the debarred entity. Some government agencies provide detailed information such as Date and Place of Birth, aliases, Complete Address, Nationality, etc. Law Enforcement Related Wanted Lists sometimes even include photos. Some provide the many alternate names of unscrupulous companies. While some others have very sparse information. There may be cases when the match is so close, or the government list contains so little information that it makes determination difficult. In these situations, when

Export Compliance Plan Standard Operating Procedure (SOP) Restricted Party Screening (RPS) End-Use & End-User Checks	
Document Number:	ECP-20210110-SOP4
Issue Date:	10/04/2021
Revision Date:	09/10/2025

escalating the RPS alert to the Export Control Office, please make sure to include the reason why you performed the screening. The Export Control Officer will review the screening and perform a risk analysis to evaluate if an export license or approval is required. Do not proceed with the transaction until the Export Control Officer indicates the transaction is clear to proceed.

Log Off
Descartes Visual Compliance Research Edition

CCL/ECCN
ITAR/USML
Inventory
RPS
Regulations
Schedule B
Resources
Home

You searched for any records containing:

Search criteria:
 Name: Wayne Smith
 Company: n/a
 Address: n/a
 City: n/a
 State: n/a
 Country: n/a

Search type: for Fuzzy [2] matches, which returned 8 results.
 Field Specific on, Business words removal
 [Export, Sanctions, GSA, Police, PEP and International data groups.*]
 GSA data is updated in full every business day direct from SAM/EPLS.

Date of search: Friday, February 26, 2021
Time of search: 08:08 PM UTC

Search same keywords again
New Search
Alerts Help

PDF
EXCEL

Reference	Name	FRC [Click for PDF]	Alert
DBP000063	SMITH, Wayne P. 2333 Big Woods, Edgerly Road Vinton LA United States	63 FR 29773-74	

Reference	RPS Details	Close										
DBP000063	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td>Reference</td> <td>DBP000063</td> </tr> <tr> <td>Description</td> <td>SMITH, Wayne P. 2333 Big Woods, Edgerly Road 70668 Vinton LA United States</td> </tr> <tr> <td>Notes</td> <td>63 FR 29773-74 06/01/98. List of Statutorily Debarred Parties [09/14/2009]. Notice is hereby given that the Department of State has imposed statutory debarment pursuant to Sec. 127.7(c) of the International Traffic in Arms Regulations (22 CFR 120 to 130) on persons convicted of violating or conspiring to violate section 38 of the Arms Export Control Act.</td> </tr> <tr> <td>Federal Register</td> <td>63 FR 29773-74</td> </tr> <tr> <td>Source</td> <td>AECA Debarred Parties [DDTC]</td> </tr> </table>	Reference	DBP000063	Description	SMITH, Wayne P. 2333 Big Woods, Edgerly Road 70668 Vinton LA United States	Notes	63 FR 29773-74 06/01/98. List of Statutorily Debarred Parties [09/14/2009]. Notice is hereby given that the Department of State has imposed statutory debarment pursuant to Sec. 127.7(c) of the International Traffic in Arms Regulations (22 CFR 120 to 130) on persons convicted of violating or conspiring to violate section 38 of the Arms Export Control Act.	Federal Register	63 FR 29773-74	Source	AECA Debarred Parties [DDTC]	
Reference	DBP000063											
Description	SMITH, Wayne P. 2333 Big Woods, Edgerly Road 70668 Vinton LA United States											
Notes	63 FR 29773-74 06/01/98. List of Statutorily Debarred Parties [09/14/2009]. Notice is hereby given that the Department of State has imposed statutory debarment pursuant to Sec. 127.7(c) of the International Traffic in Arms Regulations (22 CFR 120 to 130) on persons convicted of violating or conspiring to violate section 38 of the Arms Export Control Act.											
Federal Register	63 FR 29773-74											
Source	AECA Debarred Parties [DDTC]											

PDF
PRN
E-MAIL THESE RESULTS

Export Compliance Plan Standard Operating Procedure (SOP) Restricted Party Screening (RPS) End-Use & End-User Checks	
Document Number:	ECP-20210110-SOP4
Issue Date:	10/04/2021
Revision Date:	09/10/2025

RESTRICTED PARTY SCREENING RISK ANALYSIS

RPS results escalated to the Export Control Office for risk analysis will be documented using Appendix E, or an equivalent. Completed risk analysis will be retained by the Export Control Office with a copy sent to the UCR Member that performed the initial RPS.

DYNAMIC SCREENING ALERTS

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.

The Visual Compliance tool automatically re-screens your past RPS searches whenever the U.S. Government issues updates to their restricted lists. In the event your original RPS search term ‘matches’ a recently added entity, you will receive a Dynamic Screening Alert via email from Descartes Visual Compliance for review. Please review the alert using the steps provided in this SOP to determine if it is an accurate match. Depending on the specificity of your original RPS search, you may receive false-positive alerts. If you are unsure if it is a match, please contact the Export Control Office for review and assistance.

RECORDKEEPING

All documents created or modified in the performance of this SOP shall be retained and managed in accordance with relevant Export Control regulations and as captured in the UC Records Retention Schedule⁵. In the event of conflict between the retention periods in the regulations and the UC Records Retention Schedule, the periods specified by the regulations shall take precedence. If the controlling agencies have no stated requirements, records should be kept no longer than as required by the UC Records Retention Schedule. To verify or obtain record retention information and instructions please contact the Export Control Office.

All RPS records must be saved in a dedicated RPS file maintained by the UCR Member that has conducted the RPS. UCR Members may save Visual Compliance RPS records by choosing one of the following:

1. To save your RPS record as pdf, click on the  icon in the RPS result and save the record to your desired location.

⁵ University of California – Records Retention Schedule <https://recordsretention.ucop.edu/>


Export Compliance Plan Standard Operating Procedure (SOP) Restricted Party Screening (RPS) End-Use & End-User Checks	
Document Number:	ECP-20210110-SOP4
Issue Date:	10/04/2021
Revision Date:	09/10/2025

- To email your RPS record, click on the [+ E-MAIL THESE RESULTS](#) in the RPS result to expand email delivery options. To send the RPS record to yourself, please be sure that the 'Send to me.' box is checked, and you have entered a valid email address.

TRAINING RESOURCES

Basic education and training materials on Restricted Party Screening are made available to all UCR faculty, staff, and students via the Learning Management System (LMS). To access these training materials, visit the Training Resources block of UCR's Export Control website at: <https://exportcontrol.ucr.edu/>.

The Visual Compliance Training Center is available to RPS users and contains helpful tips and training videos on how to use Visual Compliance. Training videos are all approximately 2-3 minutes long and are an excellent way to get new users quickly introduced to Visual Compliance and its RPS tool.

To access the Visual Compliance Training Center, logon to your account and click the  Training icon at the bottom of the home page. The Visual Compliance Training Center will open in a new window and includes the following training videos:

Lessons	Status
1. Basic Searches (01:05)	<input type="radio"/>
2. Getting A Match (01:49)	<input type="radio"/>
3. Alert Levels	<input type="radio"/>
4. RPS Search Types	<input type="radio"/>
5. RPS Search Options	<input type="radio"/>
6. Country Alerts	<input type="radio"/>
7. Using The Name And Company Fields	<input type="radio"/>
8. Lists Screened Against	<input type="radio"/>
9. Searching With Acronyms	<input type="radio"/>
10. Data Entry How-To's	<input type="radio"/>
11. Searching With Long Names	<input type="radio"/>

NOTE: first time visitors to the Visual Compliance Training Center may experience a slight delay while the training video page downloads.

For additional training resources and materials on RPS, please contact the Export Control Office.



Export Compliance Plan Standard Operating Procedure (SOP) Restricted Party Screening (RPS) End-Use & End-User Checks	
Document Number:	ECP-20210110-SOP4
Issue Date:	10/04/2021
Revision Date:	09/10/2025

QUESTIONS

Should you have questions or concerns while performing RPS or require clarification on the applicability of the contents of this SOP, please contact the Export Control Office at exportcontrol@ucr.edu for assistance.

Export Compliance Plan Standard Operating Procedure (SOP) Restricted Party Screening (RPS) End-Use & End-User Checks	
Document Number:	ECP-20210110-SOP4
Issue Date:	10/04/2021
Revision Date:	09/10/2025

APPENDIX A – REVISION HISTORY

Date	Reason	Notes
10/04/2021	Final Version Release	Initial release
03/14/2022	Updated to incorporate ECAS Guidance Document -- Restricted Party Screening Roles and Responsibilities dated December 2021. Add Appendix C – RPS Roles and Responsibilities, and Appendix D – Restricted Party Screening Risk Analysis. Minor grammatical changes and updated reference links throughout.	
09/10/2025	Updated format, headers, and made minor grammatical changes throughout for simplified reading. Renamed Appendices and updated hyperlinks.	

Export Compliance Plan Standard Operating Procedure (SOP) Restricted Party Screening (RPS) End-Use & End-User Checks	
Document Number:	ECP-20210110-SOP4
Issue Date:	10/04/2021
Revision Date:	09/10/2025

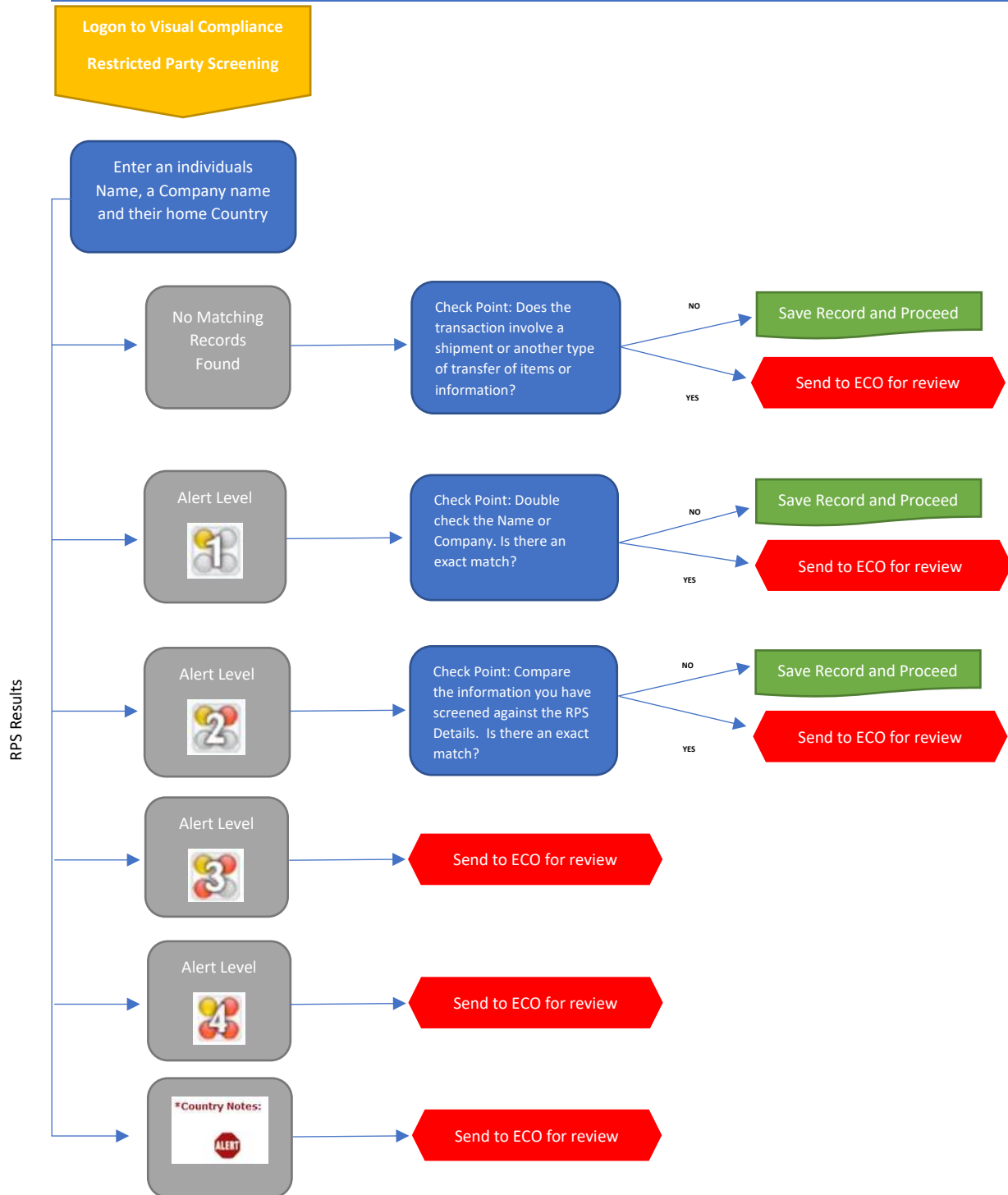
APPENDIX B - VISUAL COMPLIANCE RPS LISTS

The following are examples, not exhaustive, of the lists screened as part of Visual Compliance RPS for export control purposes. For a full list, please contact the Export Control Office.

- **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.
- **Entity List** - Parties whose presence in a transaction can trigger a license requirement supplemental to those elsewhere in the Export Administration Regulations (EAR).
- **Unverified List** - End-users who the Bureau of Industry and Security has been unable to verify in prior transactions.
- **Military End User (MEU) List** - Identifies foreign parties that are prohibited from receiving items described in Supplement No. 2 of Part 744 of the EAR unless the exporter secures a license.
- **Nonproliferation Sanctions** - Parties that have been sanctioned under various statutes.
- **Debarred List** - Entities and individuals prohibited from participating directly or indirectly in the export of defense articles, including technical data and defense services.
- **Specially Designated Nationals (SDN) List** - Parties who may be prohibited from export transactions based on regulations administered by the Treasury Department’s Office of Foreign Assets Control.
- **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 programs, as well as foreign persons who have facilitated deceptive transactions for or on behalf of persons subject to U.S. Sanctions.
- **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.
- **General Services Administration (GSA) Lists** - Parties excluded from Federal Procurement Programs, Non-Procurement Programs, and Federal Reciprocal Programs.
- **Office of Inspector General Lists** - Individuals / Entities excluded from Federal Health and Medicare Programs.
- **International Terrorist, Blocked Person, Wanted, and Entity Lists** of Australia, Canada, European Union, Japan, Kingdom of Saudi Arabia, United Kingdom, and including but not limited to the World Bank Listing of Ineligible Firms.

Export Compliance Plan Standard Operating Procedure (SOP) Restricted Party Screening (RPS) End-Use & End-User Checks	
Document Number:	ECP-20210110-SOP4
Issue Date:	10/04/2021
Revision Date:	09/10/2025

APPENDIX C - RPS PROCESS MAP





Export Compliance Plan Standard Operating Procedure (SOP) Restricted Party Screening (RPS) End-Use & End-User Checks	
Document Number:	ECP-20210110-SOP4
Issue Date:	10/04/2021
Revision Date:	09/10/2025

APPENDIX D - RPS ROLES AND RESPONSIBILITIES

University Advancement Administration

Department or Unit	Agreement or Activity Type	Activity of Risk to Screen
Gift Administration	International transactions	Gifts and pledges to the University, including checks, cash, credit cards, gifts of securities and gifts-in-kind from international parties

Campus Business Services (CBS)

Department or Unit	Agreement or Activity Type	Activity of Risk to Screen
Mail Services, Receiving Services, ScotSurplus	International shipments	Transfer of items, material, or information outside the U.S.

Business & Financial Services (BFS)

Department or Unit	Agreement or Activity Type	Activity of Risk to Screen
Accounts Payable	Disbursements	Financial transactions with international parties (including individuals, banks, institutions, and other entities)
Procurement Services	Vendor Setup	Purchases and financial transactions
	Business Contracts	Interactions with international parties
	Sales or Service Agreements	Financial transactions or interactions with international parties
	Equipment Loan Agreement (ELA)	Transfer of items, material, or information
Treasury	Wire Transfer Payments (incoming and outgoing)	Financial transactions with international parties (including individuals, banks, institutions, and other entities)

Office of Technology Partnerships

Department or Unit	Agreement or Activity Type	Activity of Risk to Screen
Technology Commercialization	Intellectual Property Protection & Licensing	Interactions with international parties
	Data Use Agreements (DUA)	DUA's may involve access to proprietary software / information that is subject to export control regulations

Export Compliance Plan Standard Operating Procedure (SOP) Restricted Party Screening (RPS) End-Use & End-User Checks	
Document Number:	ECP-20210110-SOP4
Issue Date:	10/04/2021
Revision Date:	09/10/2025

	Software License Agreements (SLA)	Software license agreements may involve access to proprietary software or information that is subject to export control regulations
Corporate Sponsored Research	Industry Sponsored Research Agreements	Financial transactions or interactions with international parties
	Material Transfer Agreements (MTA) – incoming and outgoing	Financial transactions or interactions with international parties. Transfer of items, materials, or information
	Memorandum of Understanding (MOU)	Interactions with international parties
	Non-Disclosure Agreement (NDA), Confidential Disclosure Agreement (CDA), or similar agreements	Information or material received under an NDA is not in the public domain and is therefore subject to export control regulations. An export license may be required in order to provide export-controlled information or items to certain parties, including restricted parties (or to provide a “deemed export” of such information to a non-U.S. person in the U.S., depending on country-specific restrictions)
	Sales or Service Agreements	Financial transactions or interactions with international parties
	Unfunded Collaboration Agreement (UCA) or Research Agreement	Interactions with international parties Note: Research collaborations may outline other activities, such as purchasing export restricted equipment, shipping internationally, or visitor/student exchanges, that would require restricted party screening
	Equipment Loan Agreement (ELA)	Transfer of items, material, or information
	Data Use Agreements (DUA)	DUA’s may involve access to proprietary software / information that is subject to export control regulations
International Partnerships	Technology Transfers	Financial transactions or interactions with international parties. Transfer of items, materials, or information.

Sponsored Programs Administration (SPA)

Agreement or Activity Type	Activity of Risk to Screen
----------------------------	----------------------------



Export Compliance Plan Standard Operating Procedure (SOP) Restricted Party Screening (RPS) End-Use & End-User Checks	
Document Number:	ECP-20210110-SOP4
Issue Date:	10/04/2021
Revision Date:	09/10/2025

Research Agreements, Contracts, Grants, Other sponsored research awards and agreements	Funding from or interactions with international parties (including providing or receiving services) during the course of research projects. Note: Research project proposals may outline separate, individual activities, such as purchasing export restricted equipment, shipping internationally, or collaborating with international parties, that would require RPS
Subawards (incoming and outgoing)	Financial transactions or interactions with international parties
Teaming Agreement (TA)	Interactions with international parties
Equipment Loan Agreement (ELA)	Transfer of items, material, or information
Data Use Agreements (DUA)	DUA's may involve access to proprietary software / information that is subject to export control regulations
Clinical Trials	Interactions with international parties
Unfunded Collaboration Agreement (UCA) or Research Agreement	Interactions with international parties Note: Research collaborations may outline other activities, such as purchasing export restricted equipment, shipping internationally, or visitor/student exchanges, that would require RPS

Export Control Office

Agreement or Activity Type	Activity of Risk to Screen
Export Licenses	Prior to submitting an export license to the cognizant federal agency, any parties associated with the license and the requested activities therein need to be screened to ensure none are restricted parties.
Technology Control Plans (TCPs)	Prior to allowing access to export restricted items, technology or information under a TCP, any parties to be granted access need to be screened to ensure none are restricted parties.
International Travel	Travel to sanctioned countries by UCR employees

International Affairs (IA)

Agreement or Activity Type	Activity of Risk to Screen
Incoming Visiting Scholars or Grad Students	Interactions with international parties Note: In contrast to matriculated students enrolled in courses at UC, visiting scholars and students maintain their affiliation with their home institution and are therefore viewed as a representative of that institution under export control regulations. The visitors as well as any current affiliations should be screened using RPS
Study Abroad Programs	Students studying outside the U.S. should be aware of the potential impact of interacting with sanctioned parties or countries. Screening should be performed in connection with studies in sanctioned countries to identify potential requirements and to identify potential engagements with restricted parties abroad.



Export Compliance Plan Standard Operating Procedure (SOP) Restricted Party Screening (RPS) End-Use & End-User Checks	
Document Number:	ECP-20210110-SOP4
Issue Date:	10/04/2021
Revision Date:	09/10/2025

UCR Extension

Agreement or Activity Type	Activity of Risk to Screen
Customized education provided to students outside the U.S.	Education offered through customized online or remote courses must consider Export Controls and OFAC sanctions in particular. Matriculated students enrolled at UC and issued a student visa from the State Department to study in the U.S. are largely exempt from export controls if the courses offered constitute catalog courses consisting of publicly available, educational information. Customized courses or education services provided to certain parties, including restricted parties, or to individual residents to or citizens of a sanctioned country are not exempt and may require an export license. University Extension or other unit providing service should conduct screening on international students, institutions and countries and work with the local Export Control Office to navigate sanctions compliance successfully.

Export Compliance Plan Standard Operating Procedure (SOP) Restricted Party Screening (RPS) End-Use & End-User Checks	
Document Number:	ECP-20210110-SOP4
Issue Date:	10/04/2021
Revision Date:	09/10/2025

APPENDIX E - RESTRICTED PARTY SCREENING RISK ANALYSIS

FOR REFERENCE ONLY

GENERAL INFORMATION

Principle Investigator:		Organization:	
Title:		Department:	
Primary Entity:		Agreement Type:	
Description of engagement:			
Research asset(s): <i>What are the UC research assets that require protection? For example, data, intellectual property, individual or institutional reputation.</i>			

RESTRICTED PARTY SCREENING

Entity	Name	Visual Compliance	World Check One	Unitracker	Notes
Primary					
Secondary entities (i.e., affiliates)					

RISK ANALYSIS

Question	Response
Is the research topic a general emerging technology area? If yes, describe.	
What are the academic benefits to UC of this engagement?	
What is the level of importance of this engagement to UC – strategic importance, moderately helpful or opportunistic?	
What are the academic benefits to the other party of this engagement?	
Is there any aspect of the engagement that seems unusual, unnecessary, or poorly specified?	

Export Compliance Plan Standard Operating Procedure (SOP) Restricted Party Screening (RPS) End-Use & End-User Checks	
Document Number:	ECP-20210110-SOP4
Issue Date:	10/04/2021
Revision Date:	09/10/2025

FOR REFERENCE ONLY

What is the relationship of the entity with UC? For example, have all the participants been identified? Are all participants known to the PI? How did they become known?	
What are the political, civil, and human rights risks?	
What are the intellectual property risks?	
Is there a risk to U.S. national competitiveness or security?	
What <u>are</u> the export compliance risks?	
Is the background of the entity consistent with the stated research goals?	
Other information to consider?	

SUMMARY

Risk Category	Risk Rating	Comments
UC Ethical Values		
Ethical & Human Rights		
Risks to Research Assets		
Export Compliance		
Reputational		
Overall Risk Rating		

RISK RATING:

LOW	Minimal to no risks identified. The engagement may proceed.
MEDIUM	An elevated level of risk has been identified. Details of the engagement must be examined by local leadership prior to proceeding.
HIGH	Risk tolerance exceeded. Engagement requires approval from local leadership. A formal control plan to manage and or mitigate undue risks must be implemented prior to proceeding.

Conclusion

<p>Proceed with engagement with the following risks mitigation measures:</p> <p>Rework engagement:</p> <p>Decline engagement:</p>
