

UC Riverside, School of Medicine Policies and Procedures**Policy Title:** Restricted Party Screenings**Policy Number:** 950-02-033

Responsible Officer:	Chief Compliance Officer
Responsible Office:	Compliance Advisory Services
Origination Date:	7/07/2022
Date of Revision:	N/A
Scope:	Export Control Procedures

I. Policy Summary

This Policy addresses the University of California, Riverside School of Medicine (SOM's) compliance with U.S. export control laws and regulations, while adhering to the University's mission as an institution of higher education. The University maintains an open academic environment in support of its mission of teaching, research, and public service. At the same time, export control laws and regulations control the conditions under which certain information, technologies, and commodities can be exported overseas to anyone, including U.S. citizens, or to a foreign national within the U.S. The SOM is committed to complying with all U.S. export control laws in both research and non-research activities.

II. Definitions**ECO** – Export Control Officer**ECP** – Export Compliance Program Plan

A. Export Controls are federal laws that govern the conditions, under which certain information, technologies, commodities, and services can be exported, re-exported or transferred to a foreign national, entity, or country. The primary goal of Export Controls is to protect U.S. national security and promote U.S. foreign policy interests without constraining legitimate international trade.

Examples of university activities that may be subject to Export Controls include, but are not limited to:

1. Research collaborations and agreements with international parties.
2. Technology and material transfers, whether physical or electronic.
3. International travel for conferences, teaching, research, and other university business.
4. Inviting and hosting international scholars and visitors.
5. Purchases from, and the subsequent payment to, international suppliers.
6. Financial transactions, including contributions and donations of funds, material or support.
7. Shipments, whether physically shipped, hand-carried or electronically transferred.

B. 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 a restricted party found on a U.S. Government list. 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 and Ukraine) without the proper authorization, such as an export license.

C. Visual Compliance is a web-based tool and is 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 their UC email address.

III. Policy Text
N/A

IV. Roles and Responsibilities

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 C** attached to **Export Compliance Plan Standard Operating Procedure, RPS Roles and Responsibilities** for a list of Departments (Offices) and Activity.*

V. Procedures

A. Screening Process

RPS should take place at first contact, prior to the export, re export, transfer or financial transaction taking place, and should be performed for all international activities.

Appropriate SOM staff will perform RPS for all foreign sponsors, sub recipients, and collaborators that are parties to UCR SOM agreements. Staff shall keep evidence of RPS results on file with the transaction records to be available for audit by the SOM Compliance Advisory Services Department or other auditors/regulators.

B. Escalation procedures for positive screening

When identified, escalate to the Export Control Office any potential export control “Red Flags” (as defined in the *Export Compliance Plan Standard Operating Procedure*), or export-controlled items or materials identified in an agreement.

C. Periodic ECO monitoring process to ensure that the responsible parties are performing these procedures

In accordance with the Export Control Policy, the overall responsibilities and obligations of the ECO are to:

1. Serve as the primary campus point of contact and subject matter expert for export control matters.
2. Set up procedures in cooperation with stakeholders, specific to campus activities as part of its ECP.
3. Provide on-going communication, awareness, and training on export compliance.
4. Remain current on relevant export control regulations and sanctions laws, as they may be amended from time to time, to determine their applicability to campus activities.
5. Coordinate with relevant personnel to determine export licensing requirements, exceptions, or other export authorizations.
6. Collaborate with the Chief Compliance Office and other campus officers and committees including the Ethics & Compliance, Risk and Audit Controls Committee.
7. Regularly monitor and assess the overall effectiveness of the ECP and implement risk based corrective and preventative control plans.

VI. Forms/Instructions

N/A

VII. Related Information

[EXPORT COMPLIANCE PLAN STANDARD OPERATING PROCEDURE \(SOP\)](#)
[EXPORT COMPLIANCE PROGRAM PLAN \(ECP\)](#)
[UCOP POLICY ON EXPORT CONTROL](#)
[UCR EXPORT CONTROL](#)

VIII. Revision History

N/A

Approvals:

COMPLIANCE COMMITTEE (08/17/2022)

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