

	Office of Export Controls and Customs	SOP Number:	RPS002.0
	Standard Operating Procedure for:	Implementation Date:	JAN-24-2019
	Foreign Donors and Suppliers	Last Revision Date:	JAN-24-2019
		Related Policy Number:	REG01.15.08
		Related Policy Name	Export Controls and Customs Compliance

PURPOSE

Describe the process for screening Foreign Donors and Payees/Payors against various Restricted Party Lists.

This SOP establishes the responsibilities of faculty and staff involved in accepting donations from international persons, entities, or institutions. It also documents the responsibilities of faculty and staff who facilitate payments to or from international persons, entities, or institutions, otherwise known as “suppliers.” Receiving monies from, or making remittances to, international parties may implicate export control requirements and a license may be required to allow the transaction.

Following are the various Restricted Party Lists ECU screens parties against.

- AECA Debarred Parties [DDTC]
- AFOSI - Top Ten Fugitives
- ATF Most Wanted
- Australia Foreign Affairs Consolidated List
- CIA Chiefs of State and Cabinet Members (PEP)
- CPSEP Listed Entities
- Canada Economic Sanctions
- Canadian Border Services Agency Wanted List
- Cuba Restricted List
- Denied Persons List [BIS]
- Designated Terrorist Organizations
- Entity List [BIS]
- European Union Consolidated List
- Europol Most Wanted Fugitives
- FBI Kidnappings and Missing Persons
- FBI Most Wanted Terrorists
- FBI Seeking Information
- FBI Ten Most Wanted Fugitives
- FBI Wanted Fugitives
- FDA - Clinical Investigators
- FDA - Debarment List
- FDA - Disqualified and Restricted
- FinCEN Section 311 - Special Measures
- Foreign Sanctions Evaders
- GSA Excluded Parties - Nonprocurement
- GSA Excluded Parties - Procurement
- GSA Excluded Parties - Reciprocal
- HM Treasury Consolidated List
- Homeland Security Investigations Most Wanted
- ICE Most Wanted
- Interpol Recently Wanted

- Japan Foreign End-Users of Concern
- Kingdom of Saudi Arabia Wanted Militants
- Munitions Export Control Order [DDTC]
- NCIS Wanted Fugitives
- Nonproliferation Orders
- North Carolina Consolidated Debarments
- North Carolina Iran Divestment Act
- OIG List of Excluded Individuals/Entities
- OMM Vessels Blacklisted in Annex III of UN Resolution 2270 (2016)
- OSFI Consolidated List - Entities
- OSFI Consolidated List - Individuals
- OSFI Warning List
- PHS Administrative Actions Listing
- Palestinian Legislative Council List [OFAC]
- RCMP Wanted Fugitives
- Sectoral Sanctions Identifications
- Senior Political Figures and Oligarchs in the Russian Federation
- Specially Designated Nationals and Blocked Persons [OFAC]
- Terrorist Exclusion List
- U.S. DEA Major Fugitives
- U.S. Federal Register General Orders
- U.S. Marshals Service - Fugitives
- U.S. Marshals Service Most Wanted
- U.S. Postal Inspection Service
- U.S. Secret Service Most Wanted
- UN Designated Vessels Pursuant to Resolutions 1718 and 2270
- UN Port Ban Vessels
- United Nations Consolidated List
- Unverified List [BIS]
- WMD Trade Control Designations [OFAC]
- World Bank Listing of Ineligible Firms

SCOPE

RELEVANT ACTIVITES	RELEVANT AUDIENCE
Restricted Party Screening for Foreign Donors	ECU Office of University Development
Restricted Party Screening for Foreign Suppliers	ECU Office of Supplier Management
OUT OF SCOPE: International Students, Visiting Scholars, and Employees (See SOP RPS001.0 for relevant SOP)	

RESPONSIBILITIES

TASK	RESPONSIBLE PARTY	WHEN
Notify OECC of Foreign Donation Received	Office of University Development (OUD)	Weekly after donation received
Screen Foreign Vendors Against Restricted Party Lists	Office of Supplier Management (OSM)	Prior to Banner ID creation

Review RPS Potential Matches	Office of Supplier Management, OECC	Within 1 week of Daily RPS Alerts
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DEFINITIONS/ACRONYMS

ACRONYM or TERM	DEFINITION
Export Control	Regulates the shipment or transfer, by whatever means, of certain items, technology, software, and services out of the United States.
Export License	A specific authorization provided by a government agency authorizing the export or activity that is subject to certain regulations or sanctions.
License Exception	A general authorization that allows for exports that may otherwise require a specific license to take place without obtaining a license if certain stated conditions are met and upheld.
OECC	ECU Office of Export Controls & Customs. Responsible for creating, implementing, and maintaining processes and procedures that facilitate and demonstrate ECU's compliance with federal import and export regulations; also promotes topic awareness and provides training to relevant audiences.
OSM	ECU Office of Supplier Management. Responsible for performing screening (RPS) of Suppliers against the various RPLs and escalating potential matches to OECC.
ODU	ECU Office of University Development. Responsible for processing donations received from various persons, entities, or institutions.
Restricted Party	An individual or entity included on any government sanctions list, such as the Entity List, Denied Persons List, or Specially Designated Nationals List, among others. Inclusion on a sanctions list may restrict or prohibit engaging with the named individual or entity.
Restricted Party List (RPL)	Generally, U.S. or state-level lists of individuals or entities with whom various activities may be restricted or prohibited. Examples include U.S. Department of Commerce Bureau of Industry and Security's (BIS) Entity List, as well as the Department of Treasury Office of Foreign Assets Control (OFAC) Specially Designated Nationals List.
Restricted Party Screening (RPS)	The process of screening a party (foreign donor, foreign vendor) against the various Restricted Party Lists. This is done leveraging software called Visual Compliance and owned by a company called eCustoms. OECC is responsible for the Visual Compliance relationship for ECU.

PROCEDURES

Sequence	RESPONSIBLE PARTY	DESCRIPTION
1a	Office of University Development (OUD)	Provide OECC a MS Excel file of Foreign Donations Received from the prior week. File is sent to ECUExportControls@ecu.edu.
1b	Office of Supplier Management (OSM)	Screen party (vendor, patient, etc.) for which new Banner ID is to be created. Screening completed directly in Visual Compliance software and result uploaded to Xtender. Exceptions manually escalated to Director of Export Controls for further research.
1c	Office of Supplier Management (OSM)	Review Daily RPS Alerts. Rule out potential matches as invalid, or escalate to Director of Export Controls for further research.
2a	OECC	OECC screens Foreign Donor, if any, weekly in Visual Compliance software and stores the results on department Piratedrive. Only records where export control-related concern exists escalated back to OUD.
2b, c	OECC	For Daily RPS alerts, OECC reviews any escalations from Supplier Management to determine whether or not a potential match exists. Supplier Management emails these directly to Director of Export Controls for further research. OECC also reviews other potential matches from Daily RPS alerts.

OECC SERVICE LEVEL TARGET

SERVICE PERFORMED	TRIGGER EVENT	TARGET Turn-Around-Time
Perform export control screening on all Foreign Donors, review RPS escalations, review Daily RPS Alerts.	Weekly MS Excel file received from ECUBIC	3 business days from file receipt
Review RPS Escalations	Email from Office of Supplier Management	3 business days of email receipt
Review Daily RPS Alerts	Daily emails received from Visual Compliance batch screening	3 business days of email receipt

REFERENCES

REFERENCE DESCRIPTION	LOCATION
ECU Export Control Policy	http://www.ecu.edu/prr/01/15/08

CREATION/REVISION/APPROVAL HISTORY

Create Date	Owner	Approver	Comments
JAN-24-2019	Tony Rowe	Tony Rowe	First Release

Revision Date	Owner	Approver	Significant Revisions
Not Applicable	Not Applicable	Not Applicable	Not Applicable

END OF PROCEDURE