Overview

The U.S. Government agencies maintain lists of individuals and entities barred or restricted from entering into certain types of transactions with U.S. persons. Consequences for transferring or transacting with a Restricted Party are severe. A Restricted Party Screening (RPS) should be performed in all the following circumstances:

1. International Collaborations/Exchanges (involving export or exchanges with a foreign person or entity)
2. Shipments
3. Visitors

Tool

Visual Compliance™ is a software tool available for the University of Pittsburgh Community via my.pitt.edu. It is a web-based screening platform offered by eCustoms for which the University has executed a license.

One-time self-registration

To obtain access to the Visual Compliance™ tool: log into my.pitt.edu, point to My Resources, click on Visual Compliance and follow the step-by-step access guidance.

Please note that only University of Pittsburgh employees having a valid Pitt email address (@pitt.edu) can obtain access to this platform. For University of Pittsburgh employees having a UPMC email address, please contact the Office of Export Controls Services (EChelp@pitt.edu) to obtain an alternative procedure.

Also, please keep in mind that it is the user’s responsibility to safeguard his/her account.

Procedure

1. Identify all the individuals and entities that require a screening.
   Request the full legal names of the parties.
   i.e.: For individuals, as it appears on their passport.
   For entities, as it appears on any legal document, invoice etc.

2. Log in to the Visual Compliance™ System.

3. Select the “Administrative Screening” tool from the list of options on the main page.
   Note: If you are not sure about the legal name of the parties (i.e. you do not have any legal document and, therefore, are not sure about the spelling, translation etc.), do not use the “Administrative Screening” tool. You should instead select the “Restricted Party Screening” tool and perform the “fuzzy level 2” search (with “stemming”, “thesaurus”, “field specific” and “remove business words” options checked).

4. a. When screening individuals, use the box called “name”.
   b. When screening entities, use the field named “company”.
   Note: Individuals and entities must be screened separately.

5. Use the “Comments field” to enter any information that could help you identify the individual/entity (i.e. institution number, Pitt department, date etc.) in the event of any later questions.
Note: Visual Compliance™ ensures automated periodic rescreening and, in case of new potential hit(s), Visual Compliance™ will send a notification to the email address of the person who performed the initial search. If notes are placed in the “Comments” section, these specific identifiers will help you identify emails that arrive at a later date.

6. Click the “secure screen” button.

7. Save or print the search results page (in PDF format) for your records.
   a. **If there is no hit**, i.e. you obtain a “no matching records found”, you can proceed with your transaction without contacting the Office of Export Controls Services.
   b. **If there is any hit**, determine if they are false positives or potential real hits. Click on the alpha-numeric “reference” to obtain more information about the hit(s).

If you determine that there is a potential real hit or if you have any concerns, please send an email to the Office of Export Controls Services at EChelp@pitt.edu (please attach the RPS page to your email and provide us as much information as you can about the party such as copy of passport, resume etc.). Until the Office of Export Controls Services has cleared the hit(s), you should not transfer or transact with the party.

**Records**

Export control regulations require us to retain export authorizations and export documents for 5 years from their date of expiration or for 5 years after the work, travel, or visit is completed.

**Other guidance/training**

We highly recommend to Pitt Faculty and Staff performing Screenings to watch the training video (12 minutes) provided by Visual Compliance and available on my.pitt.edu
Updates: Tips and Recommendations following the last Visual Compliance training session – February 2014

During the last Visual Compliance training session, we have been advised of the following:

- To use the “administrative screening” tool (for an exact search) when you have legal documents attesting the name of the individual/company (e.g. copy of passport);
- To perform a restricted party screening “fuzzy level” search (level 2, with “stemming”, “thesaurus”, “field specific”, and “removed business words” checked) when you do not have any legal documents and/or when you are screening names that have been translated from a native language which is not English;

Other tips:

- **Tip #1: Name vs Company Search**
  Enter information in EITHER the “name” OR “company” field and not both simultaneously.
  *Reason:* company field is searched first and if a match is found on this information, it will not proceed to screen the name field.
  Also, do NOT indicate the geographical location (city, state, country) as you will never know where the individual or company has been prosecuted. Filling this in will improperly limit your search.

- **Tip #2: Data input**
  MANUALLY enter information within the field. Avoid copying and pasting as you may end-up copying and pasting invisible machine codes that could alter your search results.

- **Tip #3: Long name**
  When performing a search, avoid entering too many words in the “name” or “company” search field.
  E.g. for individual, do not enter middle names.
  E.g. for company, only search for key words. If the name of the company is “Southwest Academy of Electronic Engineering” and you perform a search on the full name, no match will be found. However, if you only search for key words such as “Southwest Engineering”, Visual Compliance will find the match.

- **Tip #4: Acronyms**
  Ensure that the acronym is tightened up as much as possible with regard to spacing.
  E.g. NBC Navegan - If you enter N B C Navegan, no match would be found. However, if you enter NBC Navegan, a result will be generated.

- **Tip #5: Special characters and symbols**
  ONLY hyphen and apostrophe are recognized by the system. However, when performing search, Visual Compliance recommends taking the hyphen out.
  *Note:* for individuals combining a married name with maiden name, we recommend to screen these last names separately. E.g.: For Linda Smith-Wilson, we recommend to perform two separate screenings: one on Linda Smith and another one on Linda Wilson.

- **Tip #6: No wildcard function**
  E.g. Do not enter individual’s name between “stars” (e.g. *Tomas*). This function does not work and, therefore, no results will be generated.