Restricted Party Screening by FSU Employees

Introduction

The U.S. government and its constituent agencies maintain a multitude of exclusion lists of individuals, companies, and other organizations that are somehow restricted from doing business with U.S. entities. The three agencies with the majority of export control responsibilities, the Department of State, the Department of Commerce, and the Treasury Department all maintain lists of entities that have had their U.S. export privileges revoked, or are banned or restricted from restricted from receiving exports from the United States. Entities listed can be domestically based or foreign.

As an exporter, FSU is expected to ensure that any export transaction does not include an entity listed on one of the lists of restricted parties. If FSU completes a non-compliant transaction with a restricted party, a violation will have occurred. In addition to the export control lists, there are a myriad of other lists of restricted parties that would be of interest to FSU employees or departments engaging in transactions with non-FSU parties.

Visual Compliance

FSU has unlimited licenses for employees, and screening is voluntary. The Office of Research Compliance Programs (ORCP) recommends that departments screen potential foreign visitors who come to FSU for 14 days or less. (Visitors approved to visit for more than 14 days are screened by ORCP during the visit approval process.) ORCP also recommends screen foreign collaborators when the transaction is not processed through a central office. ORCP will conduct screening on behalf of departments upon request.

Listed below are the types of entities that should be screened. Most of these entities are screened by FSU central offices when they receive transactions; however, employees and departments are encouraged to screen them prior to initiating any transactions.

Who should I be screening?*

- Foreign subrecipients, subcontractors, and suppliers
- Foreign sponsors of research, travel, and conferences
- Foreign entities party to other types of agreements (Data Sharing Agreements, Material Transfer Agreements, Non-Disclosure Agreements, Intellectual Property Licenses, International Exchange or Collaboration Agreements, etc.)
- University-sponsored applicants on H1-B, J-1, and other visas
- All users of FSU's DD2345 (Militarily Critical Technical Data Agreement) or other persons being vetted specifically for export compliance/national security purposes
- All distance education students accessing course information from outside the U.S.

***Most of these entities are screened by FSU central offices when they receive transactions; however, employees and departments may screen them prior to initiating any transactions.

Account Setup and Screening Instructions

FSU employees with a need to conduct screenings can request a Visual Compliance account by registering at https://www.visualcompliance.com/register.html.

Instructions for Restricted Party Screening through Visual Compliance are located here.

Training

Registered users may watch the Visual Compliance online training modules by selecting the training icon at the bottom of the screen after logging in to the site at www.visualcompliance.com. Visual Compliance also conducts quarterly training sessions on system updates and best practices and sends email notifications of training dates and times to all registered users. Although training is not required prior to using Visual Compliance, ORCP recommends that you complete the training as it provides a more complete understanding of how to screen and review the results.

Contact Information

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