

Visual Compliance Screening Guidance and Procedures

What is Visual Compliance?

Export control laws prohibit us from doing business of any kind with persons or entities on lists maintained against sanctioned individuals or entities (Restricted Party and Specially Designated Nationals Screening). LSU has a license with a 3rd party vendor for screening against these lists called Visual Compliance. [Visual Compliance](#) is a web-based tool that LSU uses to conduct Restricted Party and Specially Designated Nationals Screening.

Getting Started

LSU faculty and staff can use Visual Compliance to access the screening database by registering with Visual Compliance to request a user name and log-in. LSU has unlimited licenses for official employees and departments. However, to avoid duplicative screening, it is recommended that screening procedures designating who uses Visual Compliance are established in each department.

You will need to send an email to Visual Compliance to request a username and password. Go to the login page at <https://www.visualcompliance.com/logon.html> and you will see information for new users. Click on the Email link. You will be directed to a screen to complete the necessary information to submit your request for access.

After establishing an account with Visual Compliance at www.visualcompliance.com, the person(s) responsible for screening shall complete the training modules for Restricted Party Screening provided by Visual Compliance, to employ their recommended best practices. You can access the VC Training Center at <http://ecustoms.inquisiq3.com/>. You will need to go to the “click here” link and send an email to also request access to the training center. Once you are granted access to the Training Center, it is recommended that you review the quick start guide. A copy of Visual Compliance’s suggested best practices/procedures is cut and pasted below for your information and convenience.

Visual Compliance Best Practices and Procedures

NOTE: If you would prefer to batch process multiple names at a time, or wish to integrate real-time RPS screening in one of your own computer applications, please contact Visual Compliance about API-integrated or Batch Processing systems. Send an email, or call 1-877-ECUSTOM (328-7866).

Individual and Company Screening

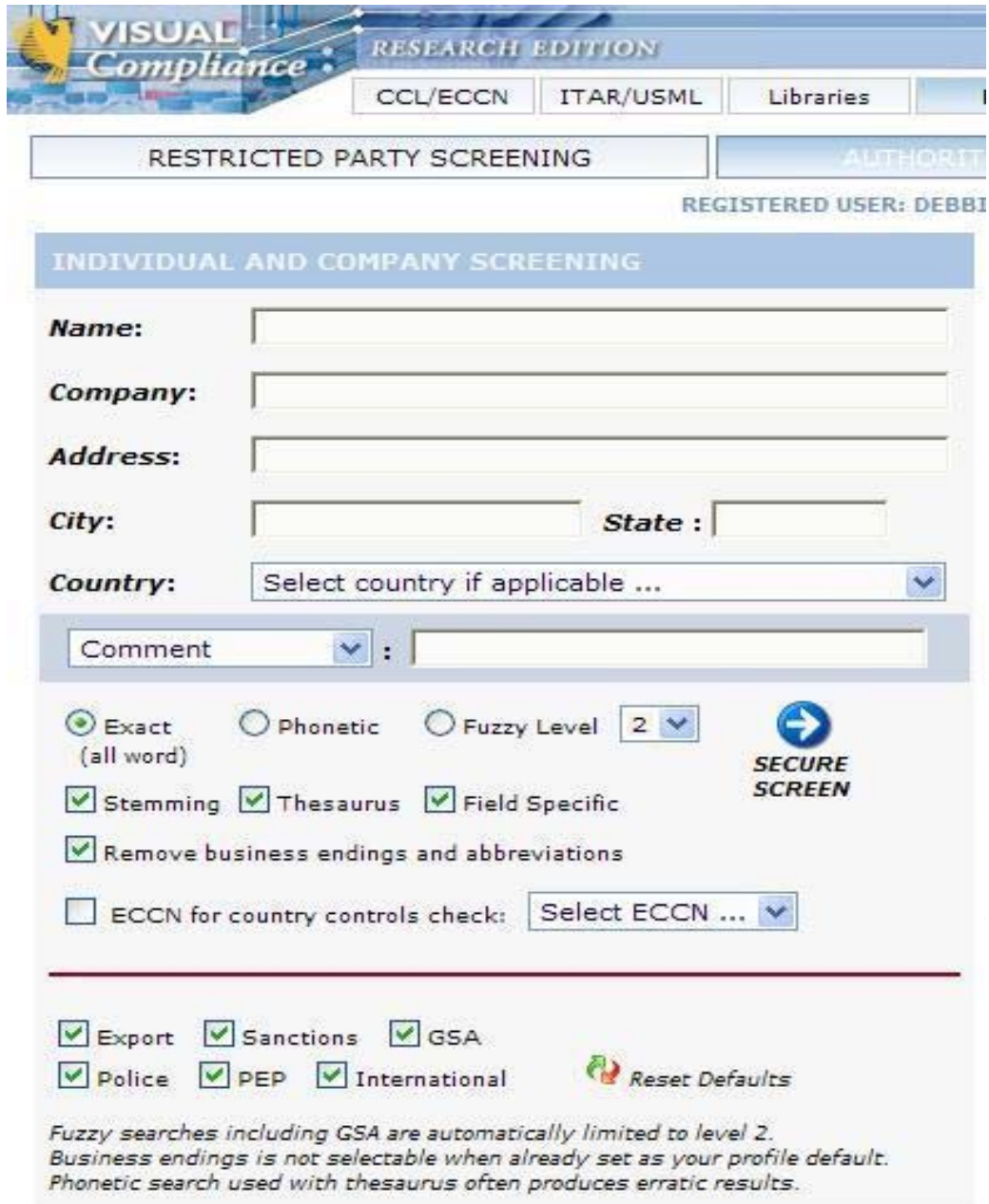
Individual and Company Screening searches the name of an individual or company against government restricted party lists. The manual entry of the names of individuals or companies and the selection of search parameters determine the results, which can vary widely depending on those selections.

Using both the name and company fields for a search does not perform two searches at once. The company name supplied is searched first; if no match is found then the name is evaluated. If both are found in the target record, the alert is escalated.

All words entered in the respective fields are evaluated in the search. This means that if all of the words you supply do not occur in a given target record, that record will not be returned in the results, the same as in an eBay or a Google search. (An "any word" mode selection is available for EIM API screening, but usually returns excessive results.)

Example: In a search for the National Institute of Standards and Technology, you might enter the words "institute of standards." You retrieve results, including the National Institute of Standards and Technology. However, on your second try, you enter "National Institute of Compliance Standards and Science Technology." Your results do not include the National Institute of Standards and Technology (the target record) because you added the word "Compliance" in your keywords, which does not occur in the target record.

1. **Enter keywords** (name of individual or company and location information) in the form fields. Keywords are required in either the Name or Company field. The Address, City, State and Country fields are optional. When a country name is included in the search request, any risk country alerts for sanctions, embargoes, and other prohibitions and cautions are returned with the search results.
 - **Comment:** Comments or references can be added in a number of named categories. These are displayed in email reports and saved in the audit log for later reference or search.



VISUAL Compliance RESEARCH EDITION

CCL/ECCN ITAR/USML Libraries

RESTRICTED PARTY SCREENING AUTHORITY

REGISTERED USER: DEBB...

INDIVIDUAL AND COMPANY SCREENING

Name:

Company:

Address:

City: **State :**

Country: Select country if applicable ...


Comment :

Exact (all word)
 Phonetic
 Fuzzy Level


Stemming
 Thesaurus
 Field Specific

Remove business endings and abbreviations

ECCN for country controls check:

SECURE SCREEN 

Export
 Sanctions
 GSA

Police
 PEP
 International
  *Reset Defaults*

*Fuzzy searches including GSA are automatically limited to level 2.
Business endings is not selectable when already set as your profile default.
Phonetic search used with thesaurus often produces erratic results.*

2. Select the parameters for your search:

- **Exact** – Returns records containing whole or partial exact matches to the spelling of the keywords entered, for all keywords supplied. (The keywords provided will be modified in the search with the use of stemming or thesaurus.)
- **Phonetic** – Accounts for variations in the way a name can be spelled; looks for letter combinations that sound the same.
- **Fuzzy** – Looks for words with letters that resemble those searched, compensating for minor spelling errors, with levels of sensitivity of 1 to 4.

The default parameter for LSU is Exact. This is the parameter that Visual Compliance recommends for most searches. However, you may select either of the three parameters for your search.

3. Select any of the additional settings:

- **Stemming** – Automatically adjusts for word endings, (i.e. –ed, –ing), returning results containing the "root" of the word.
- **Thesaurus** – Accounts for variations in form and style for geographic place names (United Kingdom, Great Britain, England, U.K.) and possible variations in proper names (Robert, Rob, Bob, Bobby).
- **Field Specific** – Prevents name and company keywords from being searched in the 'Notes' field. Deselect to also search Notes.
- **Remove business words** - Strips business declarations. Recommended for all users.
- **ECCN for country controls check** - Runs the ECCN number selected through the Commerce Country Chart license determination evaluation for the country entered in the RPS search.

For the default parameters, all of the about settings except for the ECCN country alert are checked. You may change these if you wish.

4. Select the group of lists you want to screen against: Export, Munitions, GSA, Police, Banking, and/or international. Your profile defaults will generally reflect the corporate policy for screening for your company or division.

For the default parameters, all of these are checked. You will generally want to check all of the lists which is how the default is set. However, you have the option of choosing the specific lists you want to check.

5. Click  to perform the screening

In this example, a company name and a country were entered, which produced a screening match. The destination country also returned Risk Country alerts (sanctions, embargoes, or other restrictions in force against the destination country supplied in the RPS search). Risk Country alerts are independent of screening matches and are shown whether or not a screening match is produced.

Note: Print screen shots of all of the screens used for each screening performed. Maintain these in a file so that you can refer to them to answer future questions for audits or other purposes.

The screenshot shows the eCustoms Research Edition interface. The top navigation bar includes 'VISUAL Compliance', 'RESEARCH EDITION', and 'eCustoms'. Below this are tabs for 'CCL/ECCN', 'ITAR/USML', 'Libraries', 'RPS', 'Regulations', 'Schedule B', 'Resources', and 'Home'. The main content area displays search criteria: Name (n/a), Company (BEIJING INSTITUTE OF SPACE), Address (n/a), City (n/a), State (n/a), and Country (PR China *). It indicates 2 results were returned for exact matches. A red 'ALERT' icon is present next to a list of conditions: prohibited as an export destination for defense articles and defense services under the ITAR (126.1), restricted as an export destination under Department of State U.S. Arms Embargoes, restricted as an export destination under EAR Part 736 General Prohibition Three, and subject to military end-user and end-use based control policy for specified ECCN dual-use items under EAR Part 744. A table below shows the search results with columns for MSR Reference, Name, FRC, and Alert.

MSR Reference	Name	FRC [Click for PDF]	Alert
ELT000006	BEIJING AEROSPACE AUTOMATIC CONTROL INSTITUTE (BICD) AKA 12TH RESEARCH INSTITUTE CHINA ACADEMY OF LAUNCH VEHICLE TECHNOLOGY (CALT) AKA BEIJING INSTITUTE OF SPACE AUTOMATIC CONTROL AKA BEIJING SPACEFLIGHT AUTOCONTROL RESEARCH INSTITUTE AKA CHINA AEROSPACE SCIENCE AND TECHNOLOGY CORP FIRST ACADEMY 12TH RESEARCH INSTITUTE Beijing China	75 FR 78883-92	2

Screening Results

VISUAL Compliance RESEARCH EDITION eCustoms
 CCL/ECCN | ITAR/USML | Libraries | **RPS** | Regulations | Schedule B | Resources | Home

You searched for any records containing:
Name: **mike martinez**
Company: n/a
Address: n/a
City: n/a
State: n/a
Country: n/a

Search same keywords again New Search

for exact matches, which returned **6 results**.
 [Export, Sanctions, GSA, Police, PEP and International data groups selected (see below).*]
 Time of search: **Wednesday, November 16, 2011 02:47 PM EDT**

MSR Reference	Name	FRC <small>[Click for PDF]</small>	Alert
ATF000026	MARTINEZ, Miguel AKA MARTINEZ, Mike AKA "Big Mike" AKA "Fat Mike"		
LEIE30044	MICHAEL A MARTINEZ PHILADELPHIA PA United States		
LEIE30045	MICHAEL MARTINEZ ALBUQUERQUE NM United States		
RELO49935	Michael Martinez Albuquerque		

The results screen displays the search criteria, parameters, and number of results listed at the top. The search is date and time stamped, which are important details in an audit trail. In the event of a government audit, restricted party screening results may need to be provided.

Each matching record has an MSR Reference Number that serves as a direct link to detailed information about the specific match found, including the list on which the name appears and the reason for restriction. For law enforcement lists, the detail view often includes a photo.


When applicable, the corresponding Federal Register Order is available for review in PDF format to clarify the identity of the target and the terms and conditions of the order. Opening the FR link (FRC) reveals the full text of the order. If the field is empty, it means that the U.S. government did not publish an order in the Federal Register for the violation.

Alert levels indicate the number of fields found in the RPS database matching the keywords supplied as search criteria. The more search criteria fields supplied with keywords for the search, i.e. name, company, city, state, and country, the higher the potential alert level returned. (For example, a Name match only returns a Level 1; however, a match for the Name, State and Country in the same target record could return a Level 3.) Street address information is not evaluated in the alert calculation for online searches, only city and state.

Alert Levels

- 1** Level 1 - A match for the Name or Company.
- 2** Level 2 - A match of two of the four possible search elements, including the Name or Company.
- 3** Level 3 - A match of three of the four possible search elements, including the Name or Company.
- 4** Level 4 - A match of all four of the search elements.

The screenshot shows the eCustoms Visual Compliance Research Edition interface. At the top, there is a navigation bar with the following tabs: CCU/ECOM, ITAR/USML, Libraries, RPS, Regulations, Schedule B, Resources, and Home. Below the navigation bar, the search date and time are displayed: "Date of search: Friday, March 18, 2011" and "Time of search: 11:59 AM EDT". The main content area displays search results for an individual with the following details:

MSR Reference No.	ATF000026
Description	MARTINEZ, Miguel AKA MARTINEZ, Mike AKA "Big Mike" AKA "Fat Mike"
Notes	Wanted for: Conspiracy to commit violent crimes and distribute illegal drugs. Hispanic male, 6 feet 1 inch, 250 lbs. DOB: October 11, 1979. 
Federal Register	N/A
Source	ATF Most Wanted

Below the search results, there are three icons: "Back to Results", "New Search", and "Search same keywords again".

E-mail these results

Send to me.

Send to this address:
Please type carefully. Email addresses with errors cannot be delivered.

Send to addresses on my list:

SEND TO ALL

Vivian Cal - vcal@eustoma.com

William Castillo - wcastillo@eustoma.com

Send to address groups on my list:

SEND TO ALL

eCustoms

Notations to this results email:

Include entity searched in subject line.

Include your name (the user who made the search) in subject line.

After a list like this has been produced, you can click on the MSR reference number in the first row for a detail page about the individual, company, or vessel.

Email

An email utility is supplied to send the RPS screening results and relevant notes to yourself and other specified email recipients:

Whether in the main results view or the detail window:

1. Click "EMAIL THESE RESULTS" to reveal the distribution panel.
2. To send a copy of the results to yourself, select **Send to Me**.
3. Indicate additional email recipients by entering an individual address or selecting one of your distribution lists.
4. To send a copy to a group from your personal distribution list, click the "address groups" link and select the group(s).
5. Enter any *notes* you would like included in the email.
6. Select the check box if you would like your name included in the subject line of the email.

What do I do in case of a match?

Step 1. Is the “hit” or “match” against OFAC’s SDN list or targeted countries, or is it “hitting” for some other reason (i.e., “Control List” or “PEP,” “CIA,” “Non-Cooperative Countries and Territories,” “Canadian Consolidated List (OSFI),” “World Bank Debarred Parties,” “Blocked Officials File,” or “government official of a designated country”), or can you not tell what the “hit” is?

- If it’s hitting against OFAC’s SDN list or targeted countries, continue to 2 below.
- If it’s hitting for some other reason, you should contact the “keeper” i.e. government agency of whichever other list the match is hitting against. The Denied Persons List and the Entities List, please contact the Bureau of Industry and Security at the U.S. Department of Commerce at 202-482-4811.
- The FBI’s Most Wanted List or any other FBI-issued watch list, please contact the Federal Bureau of Investigation (<http://www.fbi.gov/contact/fo/fo.htm>).
- The Debarred Parties list, please contact the Office of Defense Trade Controls at the U.S. Department of State, 202-663-2700.
- The Bank Secrecy Act and the USA PATRIOT Act, please contact the Financial Crimes Enforcement Network (FinCEN), 1-800-949-2732.
- If you are unsure whom to contact, please contact your interdict software provider which told you there was a “hit.”
- If you can’t tell what the “hit” is, you should contact your interdict software provider which told you there was a “hit.”

Step 2. Now that you've established that the hit is against OFAC's SDN list or targeted countries, you must evaluate the quality of the hit. Compare the name in your transactions with the name on the SDN list. Is the name in your transaction an individual while the name on the SDN list is a vessel, organization or company (or vice-versa)?

- If yes, you do not have a valid match.*
- If no, please continue to 3 below.

Step 3. How much of the SDN's name is matching against the name in your transaction? Is just one of two or more names matching (i.e., just the last name)?

- If yes, you do not have a valid match.*
- If no, please continue to 4 below.

Step 4. Compare the complete SDN entry with all of the information you have on the matching name in your transaction. An SDN entry often will have, for example, a full name, address, nationality, passport, tax ID or cedula number, place of birth, date of birth, former names and aliases. Are you missing a lot of this information for the name in your transaction?

- If yes, go back and get more information and then compare your complete information against the SDN entry.
- If no, please continue to 5 below.

Step 5. Are there a number of similarities or exact matches?

- If yes, please call the OFAC Sanctions Compliance Division hotline at 1-800-540-6322.

If no, you do not have a valid match.*