Ask RCRA about….

Export Control Updates

1-18-2024
Updates

1. Update on implementation of Visiting Scholar and Visiting Students Policy 7.12
2. International Shipping – Export control review process
3. Restricted or Prohibited Party screening & use of Visual Compliance software
Visiting Scholar and Visiting Students Policy 7.12

- Effective July 2023
- Provides for reviews visitors’ activities for compliance with export control regulations, research security and COI.
- Effective Sept 1, 2023 requests are submitted via OnBase Visitors’ Application Portal.

https://rcra.emory.edu
SOP on International Shipping

- Procedures to follow when shipping items internationally.
- Information required for review, approval and guidance.
- Submit requests for review via Shipping Information Form on REDCap.

https://rcra.emory.edu/export-control/policies-guidelines.html
Screening for Restricted or Prohibited Parties

- Lists of **individuals** and **entities** maintained by different federal agencies
- Both **Domestic** and **foreign**
- Publicly available

1. Excluded from receiving federal contracts, certain **subcontracts**, and certain types of federal financial and non-financial assistance and benefits.

2. Against whom certain **restrictions**, or **prohibitions** are applied by the U.S. federal agencies, international organizations, or foreign governments
# Restricted or Prohibited Parties’ Lists

<table>
<thead>
<tr>
<th>List of Excluded Individuals/Entities (LEIE) – HHS-OIG</th>
</tr>
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<tbody>
<tr>
<td>• Exclusion from federally funded health care programs - Medicare, Medicaid, and other federally funded health care programs.</td>
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<td>• State healthcare programs are included.</td>
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<th>SAM database – GSA</th>
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<tr>
<td>• Several exclusion lists maintained through System Award Management parties excluded from receiving federal contracts, subcontracts, federal financial and non-financial assistance and benefits</td>
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<tr>
<th>Export-related restricted or denied persons – Departments of Commerce and State,</th>
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<tbody>
<tr>
<td>• Denied persons, Unverified List, Entity List, Military End User List (Commerce)</td>
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<tr>
<td>• Nonproliferation List, AECA Debarred List (State)</td>
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<th>Sanctions Lists – Office of Foreign Assets Control OFAC (Treasury)</th>
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<tr>
<td>• Specially Designated Nationals and Blocked Persons list (&quot;SDN List&quot;) and other sanctions lists administered by OFAC</td>
</tr>
</tbody>
</table>
Activities Requiring Restricted Parties’ Screening

1. International Collaborators
2. International Shipment Consignees
3. Vendors and Payees
4. International Visitors - Affiliations
5. Donors - Gifts
6. Parties to all Agreements
7. All Contracts and Subcontracts
Restricted or Prohibited Parties’ Screening

• Due diligence process to ensure that Emory is not engaging with any party listed on restricted/prohibited list(s).

• Conducted by different offices and operational units across Emory
Restricted or Prohibited Parties’ Screening

• Emory uses Descartes Visual Compliance web-based software for screening.

• One stop for screening against 71 lists, including HHS-OIG and SAM database lists.

• Contact exportcontrol@emory.edu for information on access to Visual Compliance software.
Questions?

Email Export Control Office at exportcontrol@emory.edu with any questions.