

Ask RCRA about....

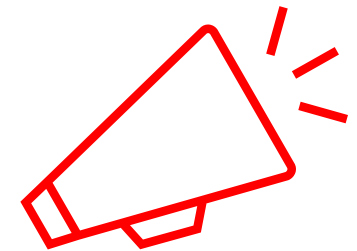
Export Control Updates

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>

Find What You Need

- [VISITING SCHOLARS AND VISITING STUDENTS](#)
- [CONTROLLED SUBSTANCES AND DANGEROUS DRUGS](#)
- [RESEARCH MISCONDUCT](#)
- [EXPORT CONTROL COMPLIANCE](#)
- [EIACUC](#)
- [ECOI/EDISCLOSE](#)

EMORY

EMORY UNIVERSITY | Research Compliance and Regulatory Affairs

Office of Research Administration
Emory University
1599 Clifton Road NE - 4th Floor

DEPARTMENTS

- Animal Care & Safety
- Clinical Research
- Conflict of Interest and Commitment
- Environmental Health and Safety
- Export Control

LINKS

- Senior Vice President for Research
- Research Administration
- Emory Home
- Emergency
- Give to Emory

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>

Policies and Guidelines

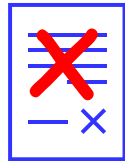


EXPORT CONTROL POLICY	+
ACTIVITIES THAT CAN TRIGGER EXPORT CONTROLS COMPLIANCE CONCERNS	+
EXPORT CONTROL CONSIDERATIONS FOR INTERNATIONAL COLLABORATIONS	+
INTERNATIONAL SHIPPING	+
INTERNATIONAL TRAVEL	+
ELECTRONIC EXPORT INFORMATION	+
HOSTING INTERNATIONAL VISITORS	+
EMPLOYEES ON NONIMMIGRANT VISAS	+
EXCEPTIONS TO EXPORT CONTROLS	+
RESOLVING EXPORT CONTROLS COMPLIANCE ISSUES	+

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

List of Excluded Individuals/Entities (LEIE) – HHS-OIG

- Exclusion from federally funded health care programs - Medicare, Medicaid, and other federally funded health care programs.
- State healthcare programs are included.

SAM database – GSA

- Several exclusion lists maintained through System Award Management parties excluded from receiving federal contracts, subcontracts, federal financial and non-financial assistance and benefits

Export-related restricted or denied persons – Departments of Commerce and State,

- Denied persons, Unverified List, Entity List, Military End User List (Commerce)
- Nonproliferation List, AECA Debarred List (State)

Sanctions Lists – Office of Foreign Assets Control OFAC (Treasury)

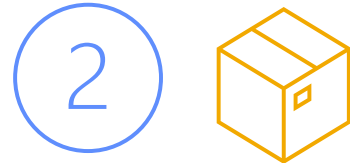
- Specially Designated Nationals and Blocked Persons list ("SDN List") and other sanctions lists administered by OFAC



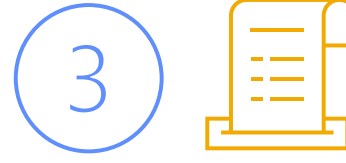
Activities Requiring Restricted Parties' Screening



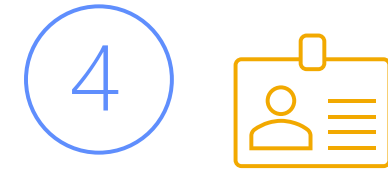
International Collaborators



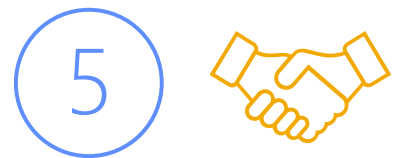
**International Shipment
Consignees**



Vendors and Payees



**International Visitors -
Affiliations**



Donors - Gifts



**Parties to all
Agreements**

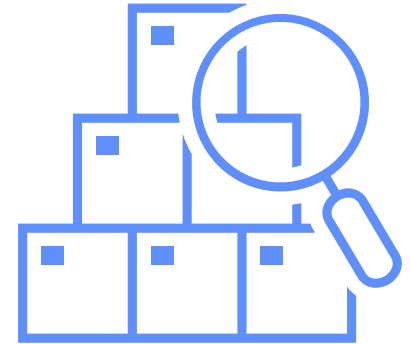


**All Contracts and
Subcontracts**



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

Descartes™ Visual Compliance Research Edition™ Log Off

CCL/ECCN ITAR/USML Inventory RPS Regulations Schedule B Resources Home

RESTRICTED PARTY SCREENING AUTHORITIES CONSULTED SANCTION PROGRAMS

REGISTERED USER: Rose Ndegwa, EMORY UNIVERSITY

INDIVIDUAL AND COMPANY SCREENING

Name:

Company:

Address:

City: State:

Country:

Comment

Exact Phonetic Fuzzy Level

Stemming Thesaurus Field Specific SCREEN

Remove business words

ECCN for country controls check:

Export Sanctions GSA

Police PEP/OIG International Reset Defaults

GSA data is updated in full every business day direct from SAM/EPLS. Business endings is not selectable when already set as your profile default. Fuzzy or phonetic search with thesaurus often produces erratic results.

BLOCKED FOREIGN NATIONALS BY COUNTRY

Display a checklist of blocked foreign nationals in a country:

GO

Many foreign nationals are not identified by country in the official sources. This query searches subscribed RPS lists [except GSA and PEP], including records having alternate country locations in Notes.

BLOCKED ENTITIES AND FUGITIVE LISTS

Display a checklist of entities on the selected government list:

GO

GEOGRAPHIC LOCATION FROM IP ADDRESS

Display geographic location of provided IP address:

GO May entail a margin of error.

RPS Changes GSA Changes Blocked Vessels IAEA Facilities Risk Country



Questions?

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