

I. Introduction

The United States restricts the provision of services and exports to any party listed on any of the many U.S. government export restricted, denial, debarment, designated, or blocked persons lists. These lists are referred to as “Restricted Party Lists” and any person or company identified on one of these lists is called a “Restricted Party”.

The Restricted Party Lists are maintained and updated regularly by the federal agencies that oversees administration and enforcement. There are three main agencies responsible for oversight: the U.S. Department of State, the U.S. Department of Commerce, and the U.S. Department of Treasury. Each agency maintains their own lists, which have been consolidated into one list, the **Consolidated Screening List**.

Before TCU personnel have any interaction with foreign persons or entities in association with research, the **Consolidated Screening List** and other lists must be reviewed to determine if the party with which interaction is contemplated is identified as a Restricted Party. This review process is called Restricted Party Screening (“RPS”).

TCU uses a web-based software tool to quickly and easily conduct RPS.

II. Procedures

- A. **RPS required.** TCU personnel, especially those in a managerial/supervisory role, are responsible for ensuring that RPS takes place *prior* to engaging in research-related activities with foreign individuals or organizations or travel to international destinations, to confirm that the person or entity does not appear on any Restricted Party Lists, including the Consolidated Screening List. All research personnel (compensated or not) are to be screened before any federal funds are released. Other required screening includes when an activity associated with research includes:
- Foreign and domestic sponsors and vendors
 - Foreign research collaborators
 - All personnel associated with export controlled research
 - Foreign visiting scientists and Designated Campus Colleagues (DCCs)
 - Subcontractors
- B. **RPS Requests.** To request a RPS, contact the Office of Research at research@tcu.edu, and include a list of all known parties (companies, institutions or individuals) to the proposed agreement or activity along with their country of citizenship or business location.
- C. **Screening Results.** The Office of Research will provide screening results usually within two business days of receiving the request. If “NO MATCHING RECORDS FOUND”, the contemplated activity may proceed. If a “TRUE MATCH” is found, further due diligence is required before proceeding. **There may be no engagement, activity, or contracts signed with, or payments to, any person or entity positively identified on one of the lists until it has been cleared through the TCU Chief Compliance Officer** (a license may be required or, in fact, could be denied). The Office of Research will

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work with the Chief Compliance Officer and the requester to ensure full compliance is achieved. If it has been determined an export license or deemed export license is required, The Office of Research will work with the requesting department to submit the application. (Note: this process can take several months for the U.S. Government to review the application, with no guarantee that a license will be issued.)

- D. Recordkeeping. All documentation relating a RPS should be kept for a minimum of 5 years and should be easily accessible for review.

III. Questions/Reports

If you have any questions about this procedure or would like to report a potential violation, please contact the Office of Research. Reports regarding violations of this Policy may be submitted anonymously by using the independent Ethics and Compliance Hotline at 1-877-888-0002.

IV. Effective Date

Effective Date: May 15, 2017