

Clearing Alerts in Restricted Party Screening with Visual Compliance

This document outlines how to clear alerts received in Visual Compliance.

Summary:

At the University of North Carolina, we use Visual Compliance to screen against government restricted party lists prior to the exchange of commodities, information, and services to ensure compliance with applicable laws and regulations.

- Government agencies maintain restricted party lists to restrict transactions with certain end-users.
- Restricted party lists reflect various matters, such as restricted end-users of some exported goods and services or restricted recipients of federal funds (e.g., due to Medicare fraud).

The Export Compliance Office (ECO) administers Visual Compliance on campus.

Individual, entity, and country alerts:

Restricted Party Screening returns **specific** alerts on individual or entity screenings, and **general** alerts on the export considerations to the screening's country field.

Specific alerts (individual/entity): Review to determine whether to clear or escalate the alert.

General alerts (country): Follow ECO guidance to your department.

- Always consult with the ECO before engaging in transactions involving [Comprehensively Sanctioned Countries and Regions](#).
- Otherwise, typically country alerts require no action. The ECO manages export compliance obligations through integration with campus business systems.

See the [Guidebook for Restricted Party Screening](#) for further information on distinguishing individual, entity, and country alerts.

How to clear individual and entity alerts:

UNC follows the [Office of Foreign Asset Control's guide-lines](#) to clear alerts.

Step 1: Compare Search Type against Match Type

Does the match pertain to an individual or to a corporate entity? Clear the match as a false positive if the match does not pertain to the correct type of search.

I.e. if you search the name of a "person", but RPS returns a match for a "vessel", "organization" or "company", then you should clear the alert.

Step 2: Check Match for Full Name

Does the match reflect a complete name from the search?

For Individuals: Clear the match as a false positive if the match does not have a first and last name.

- When an individual has two legal last names, the names together are considered the last name. Clear the match if only one last name is included in the match.

For Entities: Determine whether the match entity refers to a different organization. Note:

- *Alert Level 1:* You may clear these as false positives.
- *Alert Level 2 (or higher):* Please escalate your review to the ECO for confirmation. The ECO can provide a blanket advisory opinion regarding repeat false positives.

Step 3: Check Match for Additional Information

Does the match reflect other identifying information?

For Individuals: You may use variance in these criteria to clear the match as a false positive.

- Date of Birth
- Place of Birth
- Nationality (country of citizenship)
- Tax ID or cedula number
- Passport ID
- Address

Step 4: Contact the ECO

Contact the ECO if you:

- Believe you have a true match or
- Need support in your determination

The ECO provides regular compliance support for these global transactions across campus. Please note that some restricted party lists fall beyond the scope of global trade compliance.

Questions?

Get compliance support at:
exportcontrol@unc.edu