CHAPMAN UNIVERSITY

Screening of Individuals and Entities Guide

Screening of Individuals and Entities to Ensure Compliance with Federal Regulations

Chapman University uses several tools to expedite the screening of individuals or entities against various U.S. government lists to ensure the University does not enter barred or otherwise restricted activities with individuals and entities. Visual Compliance, a system specifically applicable to export controls and other transactions as listed below, is used to ensure that the University does not engage in a transaction with a barred entity. Risk Aware is utilized by HR after an offer is extended and accepted, as part of the pre-hire onboarding process, and the US Treasury list is utilized by Financial Services for financial transactions.

The following Chapman departments are authorized license holders for Visual Compliance and can run a restricted party screening. Office of Research (Brian Henriquez and Molly McCarty), Financial Services (Patrick Rausch), Faculty Advancement (Justin Ringor,) and Center for Global Education (Kristin Beavers). In an emergency or short deadline, one of the other offices can help with screening if the Primary Point of Contact is unavailable.

All the systems below allow for the creation of a record of the scan (e.g., a pdf document or an email of the results). Requesters for the scan should keep a record of each screening so the information can be reviewed in the future, as necessary.

Engagement or Activity	What is Screened	Requester	Primary Point of Contact	System use	Frequency Screened
Non-US sponsors	Potential sponsoring entities (companies, non-profits, etc.)	Department, PI requests	Office of Research	Visual Compliance	Before accepting an award with a new non-US sponsor
Non-US research collaborators	Institutions and, individuals	Department, PI requests for US-designated "high risk" countries* prior to initiating a new collaboration; screening also occurs for collaborators disclosed during the annual FCOI disclosure process	Office of Research	Visual Compliance	Before initiating a new collaboration with a "high-risk" country*
Non-US vendors or individual recipients of funds	Institutions and individuals	Department, PI requests	Procurement	US Treasury list uploaded into PeopleSoft	Nightly
Non-US sponsors of international travel and international conferences	Institutions	Department, PI requests	Office of Research	Visual Compliance	Before accepting the offer of sponsored travel from a

					"high risk"country*
University sponsored applicants on H1B and J-1 Research Scholar, Professor and short-term scholar VISAs	Individuals	Department, Office of the President, PI requests	Faculty Advancement	Visual Compliance	Upon request
Non-US Visiting Scholars (Scientists and Speakers)	Individuals **and** previous/continued institution of study/employment	Department, PI requests	Faculty Advancement	Visual Compliance	Before inviting the scholar to Chapman
Non-US entities with whom the University has confidentiality or non-disclosure agreements (NDA)	Institutions and individuals	Department, PI requests	Office of Research	Visual Compliance	Before initiating a new agreement
Subcontractors and sub-awardees to sponsored projects	Institutions and individuals	Department, PI requests	Office of Research	Visual Compliance	Before issuing a new subaward
Recipients of Chapman Materials (e.g. through a Transfer Agreement)	Institutions and individuals	Department, PI requests	Office of Research	Visual Compliance	Before requesting an MTA, if needed or prior to shipment if there is no MTA
Employees	Excludes: student employees (IS&T, HR, Accounting, Cashier, Ticketing, Public Safety, phonathon and those not working the community) and non-paid volunteers that those that shadow researchers.	Department, HR	Human Resources	RiskAware – SuperAware Background	After an offer is extended and accepted, part of the pre-hire onboarding process.
Graduate Students	Individuals and previous/continued institution of study/employment	Department request or Office of Graduate studies	Department to request any of the licensed department(s)	Visual Compliance	Before offering student enrollment
International MOU's	Institutions and individuals	Department, PI requests	Office of Research	Visual Compliance	Before discussions of a new MOU

Informal international research collaborations or partnerships	Associated individuals/institutions/organizations	Department, PI requests	Office of Research	Visual Compliance	Before initiating a new collaboration with an individual or institution in a high" country
Shipping items or technology abroad	Items to be exported and the destination	Department, PI requests	Office of Research	Visual Compliance	Before shipping or exporting
Monies exchanged with foreign persons, academic institutions, governments, companies or other foreign entities	Institutions and individuals	Department, PI requests	Financial Services	Visual Compliance	Before requesting a payment to an individual or institution.