



Business Process: SCREENING

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OVERVIEW

In order to ensure that the University of Colorado Boulder is compliant with United States Federal regulations ([FAR Subpart 9.4](#)), the Office of Contracts and Grants (OCG) must screen individuals and organizations that are contributing to our research to ensure they are appropriately vetted prior to receiving funding. This includes verification of the Department of Commerce Lists (which include the [Denied Persons List](#), [Unverified List](#), and [Entity List](#)), [Nonproliferation Sanctions](#), [AECA Debarred List](#), and [Specially Designated Nationals List](#).

SCREENING TOOLS

OCG utilizes two tools to screen entities and individuals to ensure they are not debarred, suspended, or appear on Restricted and Denied Party lists.

VISUAL COMPLIANCE

The University of Colorado is licensed to use the services of Visual Compliance (<https://www.visualcompliance.com>) to ensure companies as well as individuals are not contained on mandatory Restricted and Denied Parties lists that are maintained by the United States Government and its allies, world organizations, and law enforcement agencies. These lists help prevent CU from having business dealings with parties deemed as blocked, restricted, or denied by Governments, world organizations and law enforcement bodies. Visual Compliance uses a process called Dynamic Screening, which means CU will receive updates if the status should change regarding any entity or individual previously screened by OCG. Consequently, the results of all screenings performed by OCG are emailed to the general user performing the screening and to ocgdir@colorado.edu to ensure any Dynamic Screening notifications can be received by a generic OCG mailbox.

Our license with Visual Compliance allows us to add additional users within OCG in order to meet our business needs. In order to add additional users, the OCG supervisor should email the Office of Export Controls (OEC) to create an account for the individual. Training will then be scheduled with the individual on how to use the Restricted Party Screening module within Visual Compliance.

SYSTEM FOR AWARD MANAGEMENT

The System for Award Management (SAM) (<https://www.sam.gov>) is a United States Government-managed database that serves as the repository for all screened entities. This database can include both domestic and foreign entities. Furthermore, all businesses that are working with the Government must first register before they are able to receive a contract. While an individual must log in before making changes to an existing account or establishing a new record, the public can search the records without creating an account.



SCREENING PROCEDURES

SPONSORS (OCG PROPOSALS TEAM)

In 2013, all current sponsors listed in OCG's database were systematically screened by Visual Compliance for debarments, suspensions, or restricted and denied parties. As of 2/1/2017, the Assistant Director of the Proposal Development team or her delegate screens all new sponsors at the proposal stage through Visual Compliance to ensure that the sponsor is not contained on a restricted list. These new sponsors are not added into the OCG database until a successful screening has been conducted.

CONTRACTS (OCG CONTRACTS TEAM)

At the time a contract is negotiated, the designated Contract Officer on the OCG Contract's team screens Small Business funded contracts (Small Business Innovative Research (SBIRs) and Small Business Technology Transfer (STTR)) and agreements with international entities that are received through "Various Companies" (as listed in InfoEd) through Visual Compliance.

SUBCONTRACTS (OCG SUBCONTRACTS TEAM)

At the time an outgoing subcontract is being negotiated, a Subcontract Officer utilizes the System for Award Management (<https://www.sam.gov>) to screen all domestic entities or Visual Compliance for all international entities and the PIs associated with the international entity. This serves as verification that all subcontracts are compliant. If a Visual Compliance screening shows a match, the Subcontract's Team sends the information to the OCG Compliance Officer at ocgcompliance@colorado.edu for review and final determination, using procedures outlined in the [SOP](#).

INDEPENDENT CONTRACTORS

When Marketplace requisitions contain procurement actions involving individual contractors that are funded on Funds 30 or 31, the Effort and Cost Compliance Accountant in SPA forwards this requisition to OCG's Compliance Officer to screen through Visual Compliance. When the entity is screened (and subsequently cleared), OCG's Compliance Officer then provides the Effort and Cost Compliance Accountant verification and authorization to proceed.

RISK MITIGATION WITH A "MATCH" RESULT

In the event a match is identified when an OCG general user searches for an entity in the Restricted Party Screening module of Visual Compliance, OCG's super user is notified. Currently, this is OCG's Compliance Officer. Additionally, dynamic screening may identify a questionable individual or entity or a federal agency may contact CU about an individual uncovered during their screening process. In any of those situations, research is needed to verify whether or not the match(es) listed is(are) the same subject with whom we plan to work.



For individuals:

- Begin the review by using any information that is contained in the match(es) in order to make the determination if we can reject a match.
- This can include the date of birth or full name (including first, middle, and last name). For instance, if the subject being screened was born in the 1950s but the person appearing on the restricted party list was born in the 1990s, then we can reject the match on the basis of age.
- If we are not able to use any of this information to reject the match(es), is there additional information provided about the individual in the description of the screening results? Many times it may note the date of an individual's conviction and when they were sentenced. If a Google search of this information confirms what is stated through an official site, then you may be able to determine if the individual is presently incarcerated, confirming that the match is not the same as our subject. If the OCG Compliance Officer is able to make this determination, an email is then sent to the OCG general user with the reasons for clearing the individual, the source of the information (federal or state records, verified court report, etc.) and then verification and authorization to proceed is provided.
- In the event that the OCG Compliance Officer is not able to make this determination, the case is then further escalated to eCustoms/Visual Compliance for their final determination or proposed next steps.

For entities:

- Begin the review by using the entity's address along with any information that is contained in the match(es) in order to make the determination if we can reject a match.
- Generally, specific information may be contained that can indicate the address, type of business, and reason for misconduct. This can then be used to compare to the subject's address and type of business.
- If the OCG Compliance Officer is able to make the determination that it is a different entity, an email is then sent to the OCG general user with the reasons for clearing the entity, the source of the information (federal or state records, verified court report, etc.) and then verification and authorization to proceed is provided.
- In the event that the OCG Compliance Officer is not able to make this determination, the case is then further escalated to eCustoms/Visual Compliance for their final determination or proposed next steps.