

## **Visual Compliance: Incident Manager Guidance**

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### **Assessing Matches in Visual Compliance**

1. **Visual Compliance List of Authorities Screened**
  - a. Politically Exposed Persons (PEP) – not restricted party list: no additional action needed - release from holding queue
  - b. Other lists screened – possible legal restrictions / reputational risk: false positive analysis required

2. **False Positive Analysis**: assessing the quality of the match
  - a. **Individual vs. Entity Match**: if the name in your transaction is an individual while the name on the restricted party list is an entity (*e.g.*, company, organization, vessel) or vice versa: false positive - release from holding queue

**b. Individual Match:**

- i. Full legal name: if full legal names differ: false positive - release from holding queue

1. If the name in the public record has more specificity than Columbia’s record, request full legal name of party. For example -

Public Record	CU Record	Additional Info Needed
Susie J. Lamar	Susie Lamar	Middle name
Thomas Phillip O’Neill	Tip O’Neill	Full first name, middle name
Christopher Matthews	Chris Matthews	Full first name

- ii. If full legal names match, additional due diligence is recommended
  1. Date of Birth (“DOB”): if DOBs differ: false positive - release from holding queue
  2. If DOB is not listed in the public record, review the public record to determine what other information is listed (*e.g.*, street address, state, country, nationality, place of birth) and compare with the information you have. If necessary, request additional information from the party in order to compare it with information in the public record.
    - a. If there are no similarities or exact matches: false positive – release from holding queue
    - b. If there are similarities or exact matches: insufficient information to make false positive determination or true match – escalate for review (*see below*, “**2.d: Insufficient Information for False Positive Determination**” and “**2.e: True Match**”)

- c. **Entity Match**: Additional due diligence is recommended for all matches

- i. Review websites to determine if the matched entities are the same or affiliated with one another (*e.g.*, parent/ subsidiary). If the entities differ and are not affiliated with one another: false positive - release from holding queue, *or*
      - ii. If state of incorporation/ business registration or date of incorporation/ business registration differ and the matched entities are not affiliated with one another: false positive - release from holding queue
      - iii. If matched entities are affiliated with one another, escalate for review (*see below*, “**2.d: Insufficient Information for False Positive Determination**” and “**2.e: True Match**”)
    - d. **Insufficient Information for False Positive Determination:** escalate to RCT.
      - i. Match remains in holding queue until further notice. RCT will advise on next steps.
    - e. **True Match:** escalate to RCT.
      - i. RCT will conduct a risk assessment:
        - 1. Legal restrictions
        - 2. Reputational Risk
      - ii. Match remains in holding queue until further notice
3. Incident Manager
- a. **False Positive – “CLEAR”:** When match is determined to be a false positive: manually check “CLEAR” in the Incident Manager Status field
    - i. Incident Manager Notes section: Include information used in false positive analysis (*e.g.*, middle initial, year of birth) in Notes section, or reference information in public record/ search record that was used in false positive analysis (*e.g.*, “street address and state differ”)
      - 1. Information in Incident Manager Notes will assist with dynamic screening false positive determinations in the future
  - b. **Escalated for further review – “ESCALATE”:** When an additional review is needed: manually check “ESCALATE” in the Incident Manager Status field
    - i. Email: Use the IM mail feature to notify RCT of the match and the necessity of further review
    - ii. What happens next: match remains in the holding queue until further notice
  - c. **Review Complete, ok to proceed – “CLEAR”:** When a review is complete and the determination is that the activity will move forward manually check “CLEAR” in the Incident Manager Status field.
    - i. Notes: Use the IM notes feature to record the following comment: “Review complete – ok to proceed”
  - d. **Review Complete, not moving forward – “CLOSE”:** When a review is complete and the determination is that the activity will not move forward manually check “CLOSE” in the Incident Manager Status field.
    - i. Notes: Use the IM notes feature to record the following comment: “Review complete – not moving forward”

# INCIDENT MANAGER USER INTERFACE

IM Search  
Used to tune the parameters of your search

IM Search Results  
The results of your search appear here

Incident Details  
The detailed information related to Restricted Party alerts appears here

**Descartes Visual Compliance** | Logged as JTC2168@COLUMBIA.EDU | Log Off

Summary | IM Quick Review | **IM Full Review** | Audit Records | Notifications | Tools | VC

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**INCIDENT MANAGER SEARCH**

**SEARCH** | Incident Search by Date | Incident Keyword Search | Search Filters

From: 01/01/2022 To: 12/31/2022 | Term: | Company: IVY - COLUMBIA UNIV | Alert: All Records

Use:  Original search date  New match date |  Search words  Results  All | Division: ARTS AND SCIENCES | Status: All

|  | Screener: Select Screener | Reviewer: Select Reviewer

**Incident Search Results**

Select All on Page | Bulk status update (selected records) | Select status | Add note |  |  |

	Comment	Name	Company	Address	Country	Alert	Status	Details
1		Yuliya Grinberg	Drew University			Yellow	New	

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**Match results for selected search: 4** | Latest Alert | Alert History | Risk Country

**Incident Details for: Fang Zixuan Yuxuan**

Matched Entry	Source	Match
1	CHINESE ACADEMY OF SCIENCES Entity List [BIS]	
2	University of Chinese Academy of ASPI Defense Univ Tracker	
3	Young Talents Program of the Chir CSET Chinese Talent Progra...	
4	SHANGHAI INSTITUTE OF APPLIEI Unverified List [BIS]	

**CHINESE ACADEMY OF SCIENCES IN...**

Reference: ELT070434

Source List: Entity List [BIS]

Name: CHINESE ACADEMY OF SCIENCES INSTITUTE OF COMPUTING TECHNOLOGY AKA INSTITUTE OF COMPUTING TECHNOLOGY CHINESE ACADEMY OF SCIENCES AKA INSTITUTE OF COMPUTING TECHNOLOGY AKA CAS ICT AKA ICT CAS

Street1: No. 6, South Academy of Sciences Road, Zhongguancun, Haidian District

Street2:

City: Beijing

State:

Country: CN

Country Code: CN

Type:

Category: Entity

Screener: JTC2168@COLUMBIA.EDU

Preferences: EXT|ST1|TH1|FS1|ECO|BUS

Division: RESEARCH COMPLIANCE & TRAINING

Country: CN

Comment: COM-Comment: TEST SEARCH

Secno: EIRYC

List: 123456

Date: Jan-10-2023 14:29:59 UTC UTC

State:

City:

Address:

Address 2:

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## INCIDENT MANAGER SEARCH

Select the period for your search and a date range to include the date of the original search

Enter the search term, i.e. a reference number, individual name or entity name

Descartes Visual Compliance Logged as JTC2168@COLUMBIA.EDU | LOG OFF

Summary | IM Quick Review | **IM Full Review** | Audit Records | Notifications | Tools | VC | Home

### INCIDENT MANAGER SEARCH

**SEARCH** | **CLEAR FILTERS** | **STOP SEARCH**

*Incident Search by Date* | *Incident Keyword Search* | *Search Filters*

From: 01/06/2023 To: 01/13/2023 Term: National Calibration Inc

Use:  Original search date  New match date

Search words  Results  Comments  All

Company: IVY - COLUMBIA UNIVE Alert: All RPS Alerts

Division: ALL DIVISIONS Status: New






Screener: Select Screener Reviewer: Select Reviewer

### Incident Search Results

Select All on Page  Select All Pages (Max. 1000 records)

Bulk status update [selected records] Select status Add note SAVE

SAVE ALL CHANGES EXCEL

	Comment	Name	Company	Address	Country	Alert	Status	Details
1	<input type="checkbox"/>	COM-Comment: Test	Rodney Ramtahal	National Calibration Inc	TT	Yellow	New	    

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In the alert field, select all RPS alerts and in the status field, select New to search for new alerts

All relevant search results will appear here.

**Incident Search Results**

Select All on Page    
 Bulk status update [selected records]    
 Select status     
    
    

	Comment	Name	Company	Address	Country	Alert	Status	Details
1	COM-Comment: Test	Rodney Ramtahal	National Calibration Inc		TT	Yellow	New	

Clicking the search result causes the Restricted Party Screening alerts for the search to appear below

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Match results for selected search: 10      Latest Alert    Alert History

Incident Details for: Rodney Ramtahal			
Matched Entry	Source	Match Date	
1	NATIONAL STANDARDS A	Canada Economic Sanctions	01-13-2023...
2	NATIONAL STANDARDS A	Japan Foreign End-Users of...	01-13-2023...
3	NATIONAL STANDARDS 8	State Secretariat for Econo...	01-13-2023...
4	NATIONAL STANDARDS A	Specially Designated Natio...	01-13-2023...
5	NATIONAL STANDARDS 8	European Union Consolidat...	01-13-2023...
6	NATIONAL STANDARDS 8	HM Treasury Consolidated L...	01-13-2023...
7	NATIONAL STANDARDS A	Australia Foreign Affairs Co...	01-13-2023...
8	NATIONAL STANDARDS A	Entity List [BIS]	01-13-2023...
9	NATIONAL STANDARDS A	GSA Excluded Parties - Reci...	01-13-2023...
10	NATIONAL CALIBRATION	GSA Excluded Parties - Reci...	01-13-2023...

NATIONAL STANDARDS AND CALIBRA...	
<b>Reference:</b>	CES005365
<b>Source List:</b>	Canada Economic Sanctions
<b>Name:</b>	NATIONAL STANDARDS AND CALIBRATION LABORATORY (NSCL)
<b>Street1:</b>	
<b>Street2:</b>	
<b>City:</b>	
<b>State:</b>	
<b>Country:</b>	
<b>Country Code:</b>	
<b>Type:</b>	Syria / Syrie
<b>Category:</b>	Entity
<b>Alert Type:</b>	_Y
<b>Created:</b>	JTC2168@COLUMBIA.EDU

<b>Screener:</b>	JTC2168@COLUMBIA.EDU
<b>Preferences:</b>	EXT ST1 TH1 FS1 EC0 BUS
<b>Division:</b>	RESEARCH COMPLIANCE & TRAINING
<b>Country:</b>	TT
<b>Comment:</b>	COM-Comment: Test Search
<b>Secno:</b>	EIRYC
<b>List:</b>	123456
<b>Date:</b>	Jan-13-2023 17:45:33 UTC UTC
<b>State:</b>	
<b>City:</b>	
<b>Address:</b>	

Match results for selected search: 10

Latest Alert  Alert History

Incident Details for: Rodney Ramtahal		
Matched Entry	Source	Match Date
1	NATIONAL STANDARDS A Canada Economic Sanctions	01-13-2023...
2	NATIONAL STANDARDS A Japan Foreign End-Users of...	01-13-2023...
3	NATIONAL STANDARDS & State Secretariat for Econo...	01-13-2023...
4	NATIONAL STANDARDS A Specially Designated Natio...	01-13-2023...
5	NATIONAL STANDARDS & European Union Consolidat...	01-13-2023...
6	NATIONAL STANDARDS & HM Treasury Consolidated L...	01-13-2023...
7	NATIONAL STANDARDS A Australia Foreign Affairs Co...	01-13-2023...
8	NATIONAL STANDARDS A Entity List [BIS]	01-13-2023...
9	NATIONAL STANDARDS A GSA Excluded Parties - Reci...	01-13-2023...
10	NATIONAL CALIBRATION GSA Excluded Parties - Reci...	01-13-2023...

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NATIONAL STANDARDS AND CALIBRA...	
Reference:	CES005365
Source List:	Canada Economic Sanctions
Name:	NATIONAL STANDARDS AND CALIBRATION LABORATORY (NSCL)
Street1:	
Street2:	
City:	
State:	
Country:	
Country Code:	
Type:	Syria / Syrie
Category:	Entity
Alert Type:	_Y
Created:	JTC2168@COLUMBIA.EDU

Screeners:	JTC2168@COLUMB...
Preferences:	EXT ST1 TH1 FS1
Division:	RESEARCH COMPLIANCE TRAINING
Country:	TT
Comment:	COM-Comment: Test Search
Secno:	EIRVC
List:	123456
Date:	Jan-13-2023 17:45 UTC UTC
State:	
City:	
Address:	

All relevant RPS alerts will appear here. In this case, there are ten potential matches. Clicking individual results will allow you to view more information about the specific alert in the next column.

More information about specific alerts and the list they are on appears here. The first alert is for the National Standards and Calibration Laboratory on the Canada Economic Sanctions is selected in the leftmost column.

This column shows information about the person/automation that originally screened.

## REVIEWING ALERTS

NATIONAL STANDARDS AND CALIBRA...	
Reference:	SDN007572
Source List:	Specially Designated Nationals and Blocked Persons [OFAC]
Name:	NATIONAL STANDARDS AND CALIBRATION LABORATORY AKA NSCL AKA NATIONAL CALIBRATION CENTRE
Street1:	P.O. Box 4470
Street2:	
City:	Damascus
State:	
Country:	Syrian Arab Republic
Country Code:	SY
Type:	NPWMD
Category:	Entity
Alert Type:	_Y

NATIONAL CALIBRATION CENTRE	
Reference:	RELO19786
Source List:	GSA Excluded Parties - Reciprocal
Name:	NATIONAL CALIBRATION CENTRE
Street1:	
Street2:	
City:	
State:	XX
Country:	United States
Country Code:	US
Type:	
Category:	Special Entity Designation
Alert Type:	_Y
Created:	JTC2168@COLUMBIA.EDU

Review each alert to determine if the result is a real match or false positive by comparing relevant information such as:

1. Full name of company/institution/person
2. Location of company/institution/person
3. Date of business registration/Date of Birth

Note: The amount of information provided in an RPS alert differs depending on the Restricted Party List. Sometimes all you may have to go on is the full name of the entity or individual.

If you are able to rule the alert(s) as a false positive proceed to clear the alert and resume the workflow.

If you believe that the alert(s) is a real match or you are unable to determine that the alert(s) is a false positive escalate the RPS alerts for review by RCT.

## CLEARING RPS RESULTS

NATIONAL STANDARDS AND CALIBRA...	
Reference:	SDN007572
Source List:	Specially Designated Nationals and Blocked Persons [OFAC]
Name:	NATIONAL STANDARDS AND CALIBRATION LABORATORY AKA NSCL AKA NATIONAL CALIBRATION CENTRE
Street1:	P.O. Box 4470
Street2:	
City:	Damascus
State:	
Country:	Syrian Arab Republic
Country Code:	SY
Type:	NPWMD
Category:	Entity
Alert Type:	_Y

NATIONAL CALIBRATION CENTRE	
Reference:	REL019786
Source List:	GSA Excluded Parties - Reciprocal
Name:	NATIONAL CALIBRATION CENTRE
Street1:	
Street2:	
City:	
State:	XX
Country:	United States
Country Code:	US
Type:	
Category:	Special Entity Designation
Alert Type:	_Y
Created:	JTC2168@COLUMBIA.EDU

In this example, we searched for National Calibration Inc in Trinidad and Tobago. 9 out of 10 alerts are for the National Standards and Calibration Laboratory in Syria and 1 alert is for the National Calibration Center in the United States.

Since neither the full company name nor the location of the company match, we can rule out these alerts as false positives.







## CLEARING RPS RESULTS

**Incident Search Results**

Select All on Page    Bulk status update [selected records]   

Select All Pages (Max. 1000 records)    Select status    Add note

	Comment	Name	Company		Status	Details
1	COM-Comment: Test	Rodney Ramtahal	National Calibration Inc	TT	Yellow	<div data-bbox="1507 412 1640 643"><p>New</p><p>New</p><p>Action</p><p>Escalate</p><p><b>Clear</b></p><p>Close</p></div> <div data-bbox="1696 412 1906 467">   </div>

**3.** Once you have changed the status and put in a comment you can save all changes

**1.** To clear alerts return to the Incident Search Results section. In the status dropdown, select clear to change the alert from New to Clear.

**2.** Click on the notepad icon to write a comment. The comment serves as a justification for clearing RPS alerts. In this example, National Calibration Inc is not the same as any of the RPS results. As an example, a comment could be: "Full name of institution does not match, location does not match".

SAVE ALL CHANGES    EXCEL

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## ESCALATING RPS RESULTS

CHINESE ACADEMY OF SCIENCES IN...	
Source List:	Entity List [BIS]
Name:	CHINESE ACADEMY OF SCIENCES INSTITUTE OF COMPUTING TECHNOLOGY AKA INSTITUTE OF COMPUTING TECHNOLOGY CHINESE ACADEMY OF SCIENCES AKA INSTITUTE OF COMPUTING TECHNOLOGY AKA CAS ICT AKA ICT CAS
Street1:	No. 6, South Academy of Sciences Road, Zhongguancun, Haidian District
Street2:	
City:	Beijing
State:	
Country:	
Country Code:	CN
Type:	
Category:	Entity
Alert Type:	_R

University of Chinese Academy ...	
Source List:	ASPI Defense Univ Tracker
Name:	University of Chinese Academy of Sciences
Street1:	
Street2:	
City:	
State:	
Country:	China
Country Code:	CN
Type:	
Category:	Inclusion
Alert Type:	_R
Created:	JTC2168@COLUMBIA.EDU
Start:	2/16/2022
End:	

Young Talents Program of the C...	
Source List:	CSET Chinese Talent Program Tracker
Name:	Young Talents Program of the Chinese Academy of Agricultural Sciences
Street1:	
Street2:	
City:	
State:	
Country:	
Country Code:	
Type:	Inclusion
Category:	
Alert Type:	_Y
Created:	JTC2168@COLUMBIA.EDU
Start:	12/8/2021 10:01:48 PM

SHANGHAI INSTITUTE OF APPLIED ...	
Source List:	Unverified List [BIS]
Name:	SHANGHAI INSTITUTE OF APPLIED PHYSICS, CHINESE ACADEMY OF SCIENCES
Street1:	239 Zhangheng Road
Street2:	
City:	Shanghai
State:	Pudong District
Country:	China
Country Code:	CN
Type:	
Category:	Entity
Alert Type:	_R
Created:	JTC2168@COLUMBIA.EDU
Start:	4/10/2019

Now, let's assume there was a real match and we need to escalate the results. Perhaps we were searching for the Chinese Academy of Sciences, Institute of Computing Technology.






There is one real match out of the four alerts.

# ESCALATING RPS RESULTS

**Incident Search Results**

Select All on Page    *Bulk status update [selected records]*        1 record selected       

Select All Pages (Max. 1000 records)       

	Comment	Name	Company	Address	Country	Alert	Status	Details
1	<input checked="" type="checkbox"/>	COM-Comment: TEST	Fang Zixuan Yuxuan	Chinese Academy of Science		CN	Red •	<div style="display: flex; align-items: center;"><div style="border: 1px solid gray; padding: 2px; margin-right: 5px;">Escalate ▾ Action Escalate Clear Close</div><div style="display: flex; gap: 5px;"></div></div>

1. To escalate alerts return to the Incident Search Results section. In the status dropdown, change the alert from New to Escalate.

2. Click on the letter icon to send an email to Michelle Avallone (mla25@columbia.edu) and Jan Cheesman (jtc2168@columbia.edu).

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## ESCALATING RPS RESULTS

When you click the letter icon an email box will appear to send the RPS results. Enter the addresses into the “send to this address field” and write a note in the Notations field with your query. Hit Mail and once “Email Sent Successfully” appears hit close.

Note: To send emails to multiple people, the addresses must be separated by a comma, not a semicolon.

**Email Notification Report**

**Email sent successfully.**

Send to me.

Send to this address:

*Please type carefully. Email addresses with errors cannot be delivered.*

Send to addresses on my list:

Send to address groups on my list: *There are no email groups in your personal distribution list.*

Notations to this results email:

Log this Email to Notes.





## ESCALATING RPS RESULTS

**Incident Search Results**

Select All on Page    *Bulk status update [selected records]*  
 Select All Pages (Max. 1000 records)    Select status

When you send the email to RCT, return to the search screen and click Save all changes

	Comment	Name	Company		Status	Details		
1	<input checked="" type="checkbox"/>	COM-Comment: TEST	Fang Zixuan Yuxuan	Chinese Academy of Science	CN	Red •	Escalate <input type="button" value="Escalate"/>	   

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