

# Columbia University

## Guidance for Restricted Party Screening using Visual Compliance

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This document describes best practices when performing restricted party screenings using Visual Compliance.

To open a Visual Compliance account, please contact [Columbia's Office of Research Compliance & Training \(RCT\)](#). All new users are strongly encouraged to attend a Visual Compliance Restricted Party Screening training session.

### **Restricted Party Screening: Searches**

Sign onto [Visual Compliance](#) and click on the "Restricted Party Screening" link on the main page. You will be launched directly into the screening module.

Enter the name of the individual and/or entity to be screened. The individual and the entity with whom they are affiliated should be screened together (using the NAME and COMPANY fields, respectively). Enter country or other information if available.

Enter identifying information about the transaction in the COMMENT field. Identifying information can include the project name, PI name, proposal number or other information that associates the search with a specific project, activity or internal process (e.g., "Visiting Scholar Screening – PI: Mark Jones"). If the search being performed is a test search, please enter "TEST" in the COMMENT field. It is important to enter identifying information in the COMMENT field so that you can identify the transaction should questions about the search arise in the future. Information in the comment field is for reference only and will not be screened.

Hit "Screen" for the screening results.

### **Restricted Party Screening: Results**

#### *False Positive Determinations*

In some instances, your screening will result in a positive match. If so, the next step is to determine whether the match is real or a "false positive". This determination must be made before proceeding with the proposed transaction. To determine false positives, you should request additional information about the individual and/or entity being screened. Additional information can include the following-

- For Businesses
  - Full legal name of business
  - Country of business registration
  - Date of business registration
- For Individuals
  - Individual's full legal name
  - Individual's date of birth
  - Individual's place of birth

**Under no circumstances should confidential information (e.g., social security numbers) be requested for false positive determinations.**

By comparing the information, you have about the individual and/or entity that you screened with the information in the Visual Compliance record(s), you should be able to determine whether the match is real or a false positive.

#### *Insufficient Information for a False Positive Determination*

Occasionally, you might have insufficient information to determine whether a match is a false positive. When this happens, please [Columbia's Office of Research Compliance & Training \(RCT\)](#) for additional guidance.

#### *Real Matches*

If you determine that the screening resulted in a real match, immediately stop the transaction, escalate to your supervisor and contact [Columbia's Office of Research Compliance & Training \(RCT\)](#) for additional guidance.

#### *Dynamic Screening Alerts*

Restricted Party Lists are frequently updated. Visual Compliance automatically rescreens searches on a daily basis and will send you an email alert in the event that a name you previously screened was added to a Restricted Party List. This daily automated rescreening is known as "Dynamic Screening". It is important to review and resolve Dynamic Screening alerts. If you receive a Dynamic Screening alert, you will need to determine whether the Dynamic Screening match is a false positive, as discussed above.

If you have questions about a Dynamic Screening alert, please contact [Columbia's Office of Research Compliance & Training \(RCT\)](#).

#### Recordkeeping

Visual Compliance keeps records of all search results for a minimum of 5 years. In addition, you should keep all documentation relating to your restricted party screenings and your

responses to positive matches. This documentation should clearly explain the reasoning behind your false positive determinations and your decisions regarding how to proceed with a transaction. The documentation should include -

- Information used to make false positive determinations
- Information used to clear Dynamic Screening alerts as false positives
- Information regarding how to move forward with real matches.

These records must be kept in accordance with Columbia's recordkeeping policies and should be easily accessible for review.

### Questions

If you have questions about this guidance, restricted party screening, or Visual Compliance, please contact:

Office of Research Compliance and Training  
[research-compliance@columbia.edu](mailto:research-compliance@columbia.edu)