

# Accounts Payable, Travel Accounting and Export Controls

- Overview of Export Controls
- Restricted party screening for foreign payments
- Sanctioned country travel
- Questions?



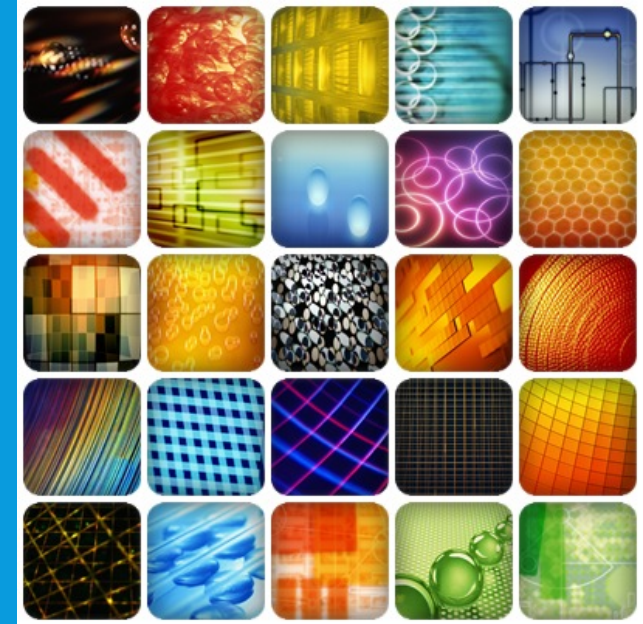
# WHAT ARE "EXPORT CONTROLS"

Federal laws and regulations that control the shipment, transmission or transfer of controlled items, information, software and services to specific individuals, entities and countries.



# WHY DOES THE GOVERNMENT CONTROL EXPORTS?

- National Security
- Nuclear Non-Proliferation
- Missile Technology Controls
- Anti-Terrorism
- Chemical & Biological Controls
- Regional Stability
- Crime Control Measures



# WHY THIS MATTERS...

## Non-compliance can result in

- Reputational harm
- Loss of research funding or funds being frozen by bank
- Penalties and fines - \$250,000 to \$1,000,000
- Criminal offenses can result in imprisonment

## Export controls may impact:

- Participation by foreign national students, faculty, staff & visitors
- Foreign collaborations
- International shipments
- Research in certain countries



# EXPORT CONTROL STRUCTURE AT UC

## Export Control Officer(s) Campus/Location

- Designated by executive leadership at each UC Location.
- Responsible for the monitoring and oversight of the local Export Control Compliance program.
- Primary point of contact and subject matter experts at that location.
- Responsible for reviewing the applicability of export control regulations.

## Associate Director UCOP/ECAS

- Supports the implementation, assessment and continuous improvement of the Systemwide export control program.
- Responsible for coordinating Systemwide communication and maintaining and disseminating regulatory information to UC Locations.
- Serve as Empowered Officials responsible for ITAR compliance.

# RISKS



# EXPORT CONTROL PARTNERS



# PROGRAM ELEMENTS

- Systemwide Policy
- Processes/Systems for Review
- Documented Procedures/Tools and Resources
- Website and Communication
- Training
- Audits and Assessments
- Record Keeping



# SYSTEMS FOR REVIEWS

## People

- Foreign visiting scholars
- Foreign national access to export restricted technology

## Places

- Foreign shipments
- Foreign payments
- Sanctioned countries transactions

## Things

- Procurement-purchasing
- Contracts, grants, NDA's, MTA's and international agreements

# RESTRICTED PARTY SCREENING

UC has a Systemwide license to Visual Compliance software.

- Screens against federal restricted party lists
- Provides a record that can be kept for record keeping purposes

DESCARTES  
Visual Compliance

Compliance  
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U.S. and Canada: [1-877-328-7866](tel:1-877-328-7866)  
International: [716-881-2590](tel:716-881-2590)

Setup your  
free demo

## Achieving export, import and financial trade compliance doesn't have to be complicated

Solutions for restricted and denied party screening, classification, automation—and more

Login to Descartes Visual Compliance™

Username \*

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VISUAL COMPLIANCE  
Research Edition

COL/ECONITARU/SHLInventoryRPSRegulationsSchedule BResourcesHome

You searched for any records containing:

Search same keywords again

New Search

Alerts Help

Search criteria:

Name: n/a  
Company: Suntek Microwave  
Address: n/a  
City: n/a  
State: n/a  
Country: n/a

Comment:

Comment: test

Search type:

for Fuzzy (2) matches, which returned 1 result.  
Stemming on, Thesaurus on, Field Specific on, Business words removal  
[Export, Sanctions, GSA, Police, PEP and International data groups.\*]  
GSA data is updated in full every business day direct from SAM/EPLS.

Date of search:

Monday, January 21, 2019

Time of search:

08:13 PM EDT

PDFPRNEXCEL

Reference	Name	FRC [Click for PDF]	Alert
DPL000444	SUNTEK MICROWAVE, INC. 8698 Thorton Avenue Newark CA United States	69 FR 26360	

PDFPRNEXCEL

[E-MAIL THESE RESULTS](#)

# RESTRICTED ENTITY LISTS

The U.S. government maintains a number of lists of federally sanctioned, debarred or restricted persons and organizations such as:

- The Specially Designated Nationals and Blocked Persons List (U.S. Department of Treasury);
- The Foreign Sanctions Evaders List (U.S. Department of Treasury);
- The Entity List (U.S. Department of Commerce);
- The Denied Persons List (U.S. Department of Commerce);
- The Unverified List (U.S. Department of Commerce);
- The Nonproliferation Sanctions List (U.S. Department of State);
- The AECA Debarred List (U.S. Department of State).

# RESTRICTED ENTITY – EXAMPLES

- BEIJING UNIVERSITY OF AERONAUTICS AND ASTRONAUTICS (BUAA) AKA BEIHANG UNIVERSITY- China
- NORTHWEST POLYTECHNICAL UNIVERSITY-Xian, China
- SICHUAN UNIVERSITY- Chengdu, China
- UNIVERSITY OF ELECTRONIC SCIENCE AND TECHNOLOGY OF CHINA - Chengdu, China
- National University of Defense Technology- China
- MALEK ASHTAR UNIVERSITY OF TECHNOLOGY- Tehran, Iran
- BAQIYATTALLAH UNIVERSITY OF MEDICAL SCIENCES – Tehran, Iran
- IMAM HOSSEIN UNIVERSITY- Tehran, Iran
- BEN GURION UNIVERSITY (BGU)- Israel
- Huawei technologies

\*Not Comprehensive use visual compliance for screening

# TRANSACTIONS INVOLVING SANCTIONED COUNTRIES



United States sanctions programs are administered by the U.S. Department of Treasury, Office of Foreign Assets Control (OFAC), and impact our university activities.

The most restrictive sanctions programs (Cuba, Iran, North Korea, Sudan, Syria and Crimea Region of Ukraine\*) prohibit U.S. Persons from:

- A broad range of services and transactions that benefit or provide value.
- Export of products, software, and transfer of technology.
- Providing educational services and technical services, even where no monetary compensation occurs.
- *\*note DOE prohibits travel to certain countries*

# SANCTIONS REGULATIONS APPLY TO U.S. PERSONS

## U.S. Persons:

- Any person within the U.S.
- Any U.S. citizen or permanent resident alien, wherever physically located
- Any entity or institution organized under U.S. law, including foreign branches

There are General Licenses for some activities and Specific Licenses can be obtained from OFAC in many cases, but terms must be strictly complied with.

# TRAVEL TO SANCTIONED COUNTRIES AND REIMBURSEMENT



# ACTION NEEDED

Faculty, staff and students, contact the location Export Control Officer (ECO) for guidance as soon as possible (before the transaction), for any of the following, involving a comprehensively sanctioned country:

- travel to (including to attend a conference)
- transfer of funds to
- any imports/exports (examples include research samples, artwork, or equipment)
- collaboration with entities in a sanctioned country
- research in

Best practices for travel accounting:

- include ECO for review of any travel to these countries
- request ECO review for virtual events with these countries
- before financial transactions with sanctioned countries, contact the ECO review

Comprehensively sanctioned: Cuba, Iran, North Korea, Sudan, Syria and Crimea Region of Ukraine



# EXPORT CONTROL RECORD KEEPING

**Category:**

D. Export Control Records

**Category Description:**

Export Control Records document the evaluation, monitoring, and status of export controlled transactions for the University. Export Controlled transactions would include those transactions subject to the Export Administration Regulations (EAR), Office of Foreign Assets Control (OFAC) regulations, International Traffic in Arms Regulations (ITAR), Foreign Trade Regulations, and Customs Regulations. These records document activities related to exports from the University, including where a decision was made not to export or transact. Records also detail efforts that may include transacting or sharing information with foreign nationals or entities within the United States. These records found in all media (paper, electronic, or otherwise) may include but are not limited to:

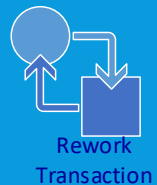
- shipping paperwork,
- license determinations and exceptions,
- license applications,
- Technology Control Plans, and
- financial records.

UC Records Retention  
Schedule

# EXPORT CONTROL REVIEW OUTCOMES



## Possible Outcomes



# CONTACT

Shilpani Perera, Chief Export Compliance Officer  
Abiola Ashorobi, Senior Export Compliance Analyst

[exportcontrol@lbl.gov](mailto:exportcontrol@lbl.gov)