UNIVERSITY OF MIAMI

POTENTIAL MATCH REVIEW - RESTRICTED PARTY SCREENING PROCEDURE

Effective Date: October 28, 2024

Revision History: Noted Below

Responsible University Officer: Vice Provost for Research

Responsible Offices: Office of the Vice Provost for Research & Scholarship (OVPRS)

Procedure Statement

This standard operating procedure (SOP) document supports the University of Miami's policy for reviewing Potential Matches that are flagged by the Amber Road (E2OPEN), Restricted Party Screening (RPS) system. A Potential Match in the RPS system are records that are flagged at the screening time because the name entered is similar to the name on the RPS, or the country entered may have Embargoes/Sanctions to be reviewed. The UM Export Control Section checks and reviews the Potential Matches to verify that the Match is indeed a one for one Match, in which case the entity would be blocked, or if the record can be approved for business with the University. The Potential Match review process is a tool that will filter, verify, and remove results that are listed as prohibited or restricted entities, including governments and individuals. The SOP is to furnish guidance with a tailored approach for reviewing Potential Matches to ensure that the "hits" are accurate within the RPS system.

Reason for the Procedure

This procedure is to optimize the use of the Export On-Demand Restricted Party Screening tool which is to safeguard that UM complies in reviewing Potential Matches in the Amber Road (E2OPEN) Platform. The Potential Matches are reviewed by the UM Export Control Section upon receipt/submission to accurately assess the "hold" count and "active" count in the RPS system. The RPS system will flag a Potential Match with a Match Score of 75% which is the default setting of the RPS system or an Absolute Embargoes listing. The Match Score establishes how close the name and address are to a name or address on the RPS.

Who should Know This Procedure?

Provost, Vice Provosts, Deans, Center Directors, Institute Directors, Department Chairs
Vice Provost for Research + Scholarship
UHealth Compliance
Audit & Advisory Services
General Counsel
Risk Management / Business Services
Director of Export Compliance
Supply Chain/Purchasing
Research Administrators
Principal Investigators
Office of Research Administration
Amber Road – RPS Users and Managers (Medical, Gables and RSMAS Campuses)

Definitions

UM	University of Miami
OVPRS	Office of the Vice Provost for Research & Scholarship
ECS	Export Control Section
RPS	Restricted Party Screening

POTENTIAL MATCH REVIEW - RESTRICTED PARTY SCREENING PROCEDURE

Procedures

The Restricted Party Screening (RPS) - Potential Match Review procedure, is for the University of Miami RPS Community that includes Users and Managers in the various departments of Medical, Gables and the RSMAES campuses. The procedure is to optimize the use of the Export On-Demand Restricted Party Screening tool in reviewing Potential Matches (Partner Listings) in the Amber Road (E2OPEN) Platform. The evaluation of Potential Matches is to ensure that the **"hits"** are accurate within the RPS system. The Amber Road RPS software tool is available for the University of Miami Community and is a web-based screening platform for which the University has executed a license. *(Note: The RPS tool automatically re-screens/saves all UM entries daily that are in the System. Includes the Notes for RPS that are reviewed, declined and approvals.)*

Step	Responsibility	Action
1	RPS USER	Restricted Party Screening (RPS) Users and Managers conduct screening in the Amber Road (E2OPEN) RPS tool. The RPS tool will "flag/hit" a "Potential Match" with results that are from 75% to 100%, or on the Absolute Embargoes lists.
2	RPS USER	If the result is a 75% to 100% hit (Hold) or on the Absolute Embargoes lists, the UM Screener will forward the RPS result to the exportcontrol@miami.edu mailbox for review by the UM-ECS.
3	OVPRS - ECS	The RPS result will be reviewed by the UM-ECS to conduct an analysis of the Partner Listing.
4	OVPRS- ECS	If the RPS report returns a 75% to 100% hit or is on the Absolute Embargoes restricted list, the UM-ECS will do the following: 1. Verify that the correct individual/entity was searched; re-runs report. 2. Review the Match Details, address and Embargoed listed. 3. Declines the result if same results occur on re-run of report and/or address is the same and if there are no exclusions available for the Embargoed reason. 4. If the RPS is verified or resolved – then the ECS will forward results to UM Supply Chain/Purchasing; the UHealth Chief Compliance Officer (UHCC) (for UHealth related vendors); or to the VP of Audit and Compliance (for non-UHealth related vendors) prior to the deactivation or reactivation of a vendor. For UHealth, the ECS will notify UHCC within two business days of identifying *any* type of UHealth-related exclusion match, including those of owners. No final decision or reactivation should be made without consulting UHCC. 5. In conjunction, UM Supply Chain/Purchasing will close all open POs for a vendor moved to the inactive status group and ultimately move the inactive vendor to a full inactive status once all outstanding invoice(s) are paid. 6. If any changes occur to the status of the vendor, the reason(s) for the change to the status should be documented to include any necessary support, such as approval emails in the ECS and Notes in the (E2OPEN) RPS tool system. *Note: UM Purchasing Department RPS review process includes determining the Partner Listings as inactive in the Workday System updates and has been removing the records with a unique identifier of (V and I). These will not require further review by the UM-ECS and in the RPS Notes Section.*
5	OVPRS- ECS	If it is determined the RPS result is not the same, the UM-ECS will do the following: 1. Approves the Potential Match from Yellow/Red to Green. 2. Document the reason for clearance in the Notes sections. 3. Absolute Embargoed will be approved if the party is not on the denied list. 4. Forwards approval from the ECS to the User/Manager and files record and correspondence electronically.

Parties to be Screened for Potential Matches (includes but not limited to):	
• Countries	• Visitors and the organization they represent
• Customers	• Sales representatives
• Suppliers and subcontractors	• Consultants
• Consignees and Intermediate Consignees	• Merger and acquisition parties
• Freight Forwarders	• New hires
• Banks or other financial institutions	• Contract workers
• Service Providers	• Agents
• "Pay to" parties	• Manufacturers
• "Pay from" parties	• End-users, if known
• Other business partners	• Recipients of technical data

Signature

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Title:	Vice Provost for Research & Scholarship	
Signature		10/30/2024
		Date

History

Effective Date	Revision Date	Authors	Description
2023-Mar-15	N/A	William J. Collins	Establish a standard operating procedure to optimize the use of the Export On-Demand Restricted Party Screening tool in reviewing Potential Matches within the Amber Road (E2OPEN) Platform. The evaluating of Potential Matches is to ensure that "hits" are accurate within the RPS system and adjudicated.
2024-Oct-28	2024-Oct-28	William J. Collins	Enhance SOP in Section 4, Step 4 by adding the stipulation to notify UHC within two business days of identifying *any* type of UHealth-related exclusion match, including those of owners. No final decision or reactivation should be made without consulting UHC.

Point of Contact Numbers

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