I. PURPOSE
To comply with U.S. federal laws and regulations, Villanova University must conduct Restricted Party Screenings (RPS) to confirm and document, prior to entering into a contract or agreement, that both individuals and/or organizations are not identified on a U.S. Government Restricted Party list.

The United States Government prohibits U.S. Persons, including educational institutions, from conducting business with persons and entities designated as restricted parties. This policy ensures compliance with a variety of legal, regulatory, and contractual requirements intended to prevent the University from engaging or making prohibited payments to individuals or entities identified on any government restricted parties list.

These restricted parties lists are administered and enforced by multiple U.S. Governmental Agencies, including the Department of Commerce, Department of State, Department of the Treasury, the Federal Bureau of Investigations, Department of Homeland Security, Office of Foreign Asset Controls (OFAC) and many others.

II. SCOPE
This policy applies to all Villanova University schools, departments, offices and units.

III. DEFINITIONS

IV. POLICY STATEMENT
Villanova University must not enter into contracts, conduct business, or otherwise participate directly or indirectly, in any activities with any entity or person found on any government-issued restricted, blocked, or denied party lists (the “restricted parties list”). The University complies with all applicable legal, regulatory and contractual requirements intended to prevent it from making prohibited payments to individuals or entities, including those from sanctioned or embargoed countries, found on any restricted parties list.

Villanova University has licensed technology from eCustoms, Inc., to facilitate screening of entities and individuals against the restricted parties list. This software tool, Visual Compliance, permits screening against the restricted parties lists using a single interface.

V. PROCEDURE (if applicable)

1. Validating a positive match result
   a) The individual who conducted the RPS (or designee) should compare the name and any additional information used to conduct the screening with the results from the restricted
parties list, e.g., address, any organizational affiliations and home country. Note: it may be necessary to validate additional information listed in the profile on the restricted parties list in order to make a determination.

b) If after the initial validation process there is still a positive match, the results must be submitted to the RPS Review Committee described in paragraph 3 below for review/recommendations.

2. **Interim Actions**
   a) All transaction/activities with the individual or entity should be put on temporary hold while the RPS Review Committee is validating the positive result.
   b) If the RPS Review Committee confirms a positive result, the individual or entity should be notified that the name has appeared on a restricted parties list and that the University has placed a temporary hold on the proposed activity until the details of the review can be verified.

3. **Final Actions**
   a) If the RPS Review Committee’s validation check confirms a positive result, the University cannot enter into the agreement/activity.
   b) The RPS Review Committee designee shall consult with the source or agency with oversight of the restricted parties list entry. After such consultation, if the information indicates that:
      i. The individual or entity is not on the restricted parties list, the results of the review should be documented and the RPS Review Committee shall communicate next steps with the department/individual conducting the screening.
      ii. The individual or the entity is confirmed to be on the restricted parties list, the individual or entity should be notified and informed that the University will not enter into an agreement/activity.

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**RPS Review Committees**

<table>
<thead>
<tr>
<th>Requester</th>
<th>Committee Makeup</th>
<th>If Research, Add</th>
</tr>
</thead>
<tbody>
<tr>
<td>Faculty</td>
<td>Provost, OGC, UCO, HR</td>
<td>ORA</td>
</tr>
<tr>
<td>Staff</td>
<td>HR, OGC, UCO</td>
<td>ORA</td>
</tr>
<tr>
<td>Undergraduate Student</td>
<td>Student Life, HR, OGC, UCO</td>
<td>ORA</td>
</tr>
<tr>
<td>Student Employees</td>
<td>Student Life, HR, OGC, UCO</td>
<td>ORA</td>
</tr>
<tr>
<td>Graduate Student</td>
<td>Provost, OGC, UCO, HR</td>
<td>ORA</td>
</tr>
<tr>
<td>Sponsor</td>
<td>ORA, Controller’s, OGC, UCO</td>
<td>ORA</td>
</tr>
</tbody>
</table>
VI. RELATED INFORMATION/FORMS

VII. HISTORY
Effective Date: September 11, 2017

VIII. RESPONSIBLE UNIVERSITY DIVISION/DEPARTMENT
University Compliance Officer
University Compliance Office
205 Tolentine Hall
800 Lancaster Avenue
Villanova, PA 19085
(610) 519-5466

IX. RESPONSIBLE ADMINISTRATIVE OVERSIGHT
University Compliance Officer
University Compliance Office
205 Tolentine Hall
800 Lancaster Avenue
Villanova, PA 19085
(610) 519-5466