6. **End User Screening Against U.S. Government Watch Lists**

This Section addresses required screening of export recipients and certain collaborative research partners against the U.S. Government’s published denied party/restricted entity watch lists.

The Departments of State, Treasury, and Commerce separately maintain published lists of known export violators. These lists are referred to collectively as the “denied parties lists.” CUNY must not enter into contracts, conduct business, exchange information, or otherwise participate, directly or indirectly, in any activities with any entity or person found on these lists. In order to comply with this requirement, CUNY employs Visual Compliance software service for denied party screening. The research compliance staff in the OVCR has access to the Visual Compliance software and conducts all screening on behalf of CUNY.

If a match using the software is discovered pertaining to a person or entity appearing on any of the U.S. Government denied parties lists and a name or entity on CUNY transaction, the transaction **must** be stopped and evaluated in order to avoid export violations.

The Visual Compliance software allows for continuous rescreening of previously screened entities and individuals in order to ensure that these have not been included in updates to the lists. Entities subject to these screening and rescreening requirements include individual research collaborators, signatories to MOUs/MOAs, as well as foreign research institutions/organizations, etc.