

Sanction Check Potential Match Verification Procedures for Employees or Affiliated Individuals

1. **Name Review** – Compare the university employee or affiliated individual’s name (including first, middle, and last name) to the name of the individual identified as a potential match per the ecocheck.ethico.com search results (e.g., “James E. Brown” listed as potential match to “John L. Brown” for an individual). If a reasonable likelihood of a match exists, then proceed to step 2.
2. **Date of Birth (DOB)** – Compare the university employee or affiliated individual’s DOB to the potential match’s DOB. You may need to view the potential match’s debarment/exclusion record on file with the respective agency’s online search system to determine if a DOB is available. If the DOB for the potential match is not available or if a reasonable likelihood of a match exists, then proceed to step 3.
3. **Address Analysis:**
 - a. **Address/Hire Date Analysis** – Compare the university employee or affiliated individual’s address (city and state) on file (HR’s Workday) to the potential match’s address (city and state) available via the respective agency’s online debarment/exclusion record. If the university employee or affiliated individual was hired after the action date for the potential match, if the address is not available or if a reasonable likelihood of a match exists, proceed to step 3.b.
 - b. **Address/Action Date Analysis** – Compare the university employee or affiliated individual’s address (city and state) history on file (HR’s Workday) to determine the individual’s address at the time of the potential match’s debarment/exclusion action date and compare it to the potential match’s address per the debarment/exclusion record. If a reasonable likelihood of a match continues to exist, then proceed to step 4.
4. **Social Security Number (SSN)** – Compare the university employee or affiliated individual’s SSN to the SSN for the potential match. You will need to verify the SSN against the respective agency’s online search system. If SSN is not available or if a reasonable likelihood of a match exists, then proceed to step 5.
5. **Certification Form** – If the university department or administrative office is unable to clear the university employee or affiliated individual using the verification procedures 1 through 4 above, a “Sanction Check” certification form must be signed by the university employee or affiliated individual. The signature is attestation that the individual has never been excluded, suspended, debarred, or otherwise deemed ineligible to participate in Federal and/or State programs. The signed certification form should be provided to the University Integrity and Compliance Office (UICO) and maintained in the responsible department or administrative office’s search verification files. Contact UICO to obtain a blank certification form.

HELPFUL HINTS PER EXCLUSION AGENCY'S ONLINE RECORD SYSTEM:**Office of Inspector General's (OIG) List of Excluded Individuals/Entities (LEIE)**

- Link to LEIE online search system: <https://exclusions.oig.hhs.gov/>.

Perform searches on the LEIE search system by copying/pasting the potential match individual's **last and first name** from the search results page to the LEIE's online individual name search screen to eliminate the risk of typographical errors. (*e.g., James L. Brown, an individual, should be entered in the Last Name (Brown) and First Name (James) search fields.*)
- Verify DOB by clicking on the Last Name link listed for the potential match. The Exclusion Search Results will display. The DOB is the fourth item from the top.
- Verify SSN by clicking on the Verify "SSN/EIN" link. Enter the SSN (without dashes) for the university employee or affiliated individual. The LEIE search system for SSN verification will include a notation of "N/A" if the OIG does not have record of SSN on file for respective individual or state "**NO MATCH**" if the SSN for the university employee or affiliated individual does not agree to the SSN of the potential match.
- The LEIE record may include a National Provider Identifier (NPI) that is a unique 10-digit identification number issued to health care providers in the U.S. by the Centers for Medicare and Medicaid Services. The NPI can be used to assist in identification of covered health care providers.
- LEIE FAQ's link: <https://oig.hhs.gov/faqs/exclusions-faq.asp>.
- It is noted in the LEIE FAQ's that if the DOB, SSN, or NPI is not included in the LEIE, then it is not available from the OIG. You may contact the OIG Exclusions Branch at exclusions@oig.hhs.gov or (202) 691-2311 to determine if there is other information available.
- Link to review the OIG Exclusion Authorities: <https://oig.hhs.gov/exclusions/authorities.asp>.

General Services Administration's (GSA) System for Award Management (SAM) Excluded Parties List System (EPLS)

- Link to SAM's EPLS online search system: <https://www.sam.gov/search>.
- Perform exact name match searches on the SAM database by copying/pasting the potential match individual's **name** (first, middle, last) from the search results to the online **Search, Select Domain, Entity Information, Exclusions, and Excluded Individual** screen to eliminate the risk of typographical errors. Once the search returns results, use the filter results to eliminate records.

- Verify SSN on the SAM database for potential match name search results by entering the SSN/EIN for the potential match individual. Enter the potential match name and employee SSN (without dashes). If there is a match, the details will be provided. If there is not a match, the screen will read “**No match found.**”
- For help with using SAM.gov to perform sanction check searches, please visit the [Help](#) page.

U.S. Food and Drug Administration (FDA) Debarment List and Disqualified/Totally Restricted List for Clinical Investigators

- FDA Debarment List:
Drug Imports
<https://www.fda.gov/ICECI/EnforcementActions/FDADebarmentList/default.htm>

Food Imports
<https://www.fda.gov/inspections-compliance-enforcement-and-criminal-investigations/fda-debarment-list-drug-product-applications/fda-debarments-food-imports>
- FDA Clinical Investigators - Disqualification Proceedings List:
<https://www.accessdata.fda.gov/scripts/SDA/sdNavigation.cfm?sd=clinicalinvestigatordisqualificationproceedings&previewMode=true&displayAll=true>

The FDA Lists do not include DOB or SSN information.

NOTE: The University's Research Integrity Director should be consulted if assistance is necessary in the verification of an individual on the FDA Lists.

Office of Foreign Assets Control's (OFAC) Specially Designated Nationals (SDN) & Blocked Persons List and Consolidated Sanctions Lists

- OFAC's Sanctions List Search: <https://sanctionssearch.ofac.treas.gov>.
- Specially Designated Nationals and Blocked Persons List (SDN) Lists:
<http://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx>
- Consolidated Sanctions List: <https://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/consolidated.aspx>
- OFAC FAQ's: <https://ofac.treasury.gov/faqs>
- For guidance on how to assess a potential match to an OFAC sanctions list, read [FAQ 5: How do I determine if I have a valid OFAC match?](#). For a name with a number of similarities or exact match, OFAC provides a toll-free hotline number 1-800-540-6322

for verification. OFAC also provides a [Compliance Hotline](#) where you can submit questions directly through OFAC's website.

NOTE: The University's Associate Director of Research Security should be consulted if assistance is necessary in the verification of an individual on the OFAC Lists.

U.S. Department of Commerce (DOC), Bureau of Industry and Security (BIS)

Export- Related Restricted, Denied, and Blocked Persons Lists:

1. Denied Persons List: <https://www.bis.doc.gov/index.php/policy-guidance/lists-of-parties-of-concern/denied-persons-list>

- The DOC maintains this list of individuals and entities that have been denied export privileges. It is illegal to enter into any transactions that would violate their denial orders.

2. Entity List: <https://www.bis.doc.gov/index.php/policy-guidance/lists-of-parties-of-concern/entity-list>

- A list of parties whose presence in a transaction can trigger a license requirement under the Export Administration Regulations (EAR). The list specifies the license requirements that apply to each listed party. These license requirements are in addition to any license requirements imposed on the transaction by other provisions of the EAR.
- The China section of the current U.S. Entity List is annotated by the Wisconsin Project to increase its usefulness as a screening tool for exporters. Read <http://www.wisconsinproject.org/category/countries/china/>

3. Unverified List (Supplement No. 6 to Part 744—Unverified List):
<https://www.bis.doc.gov/index.php/policy-guidance/lists-of-parties-of-concern/unverified-list>

- A list of parties where BIS has been unable to verify the end-user in prior transactions. The presence of a party on this list in a transaction is a “Red Flag” that should be resolved before proceeding with the transaction.

4. U.S. Consolidated Screening List: <https://www.trade.gov/consolidated-screening-list>

- A list of parties for which the United States Government maintains restrictions on certain exports, reexports, or transfers of items. The consolidated list contains multiple export screening lists of the Departments of Commerce, State, and Treasury.

NOTE: The University's Associate Director of Research Security should be consulted if assistance is necessary in the verification of an individual on the DOC Lists.

U.S. State Department (DOS), Directorate of Defense Trade Controls (DDTC)***Munitions Export -Related Restricted, Denied, and Blocked Persons*****1. List of Statutorily Debarred Parties:**

https://www.pmddtc.state.gov/?id=ddtc_kb_article_page&sys_id=7188dac6db3cd30044f9ff621f961914

- A list compiled by the DOS of parties (individuals and entities) who have been convicted of violating or conspiracy to violate the Arms Export Control Act (AECA). Accordingly, they are “statutorily” prohibited from participating directly or indirectly in the export of defense articles, including technical data or in the furnishing of defense services for which a license or approval is required by the International Traffic in Arms Regulations (ITAR).
- An individual’s name and reference to specific Federal Register citation only are provided on this list. The respective Federal Register should be reviewed to obtain additional information, including address.

2. List of Administratively Debarred Parties:

https://www.pmddtc.state.gov/?id=ddtc_kb_article_page&sys_id=8a89528adb3cd30044f9ff621f961931

- List of parties debarred on a case-by-case basis for the resolution of individual enforcement proceedings for violations of the AECA and ITAR.
- An individual’s name and reference to specific Federal Register citation only are provided on this list. The respective Federal Register should be reviewed to obtain additional information, including address.

NOTE: The University’s Associate Director of Research Security should be consulted if assistance is necessary in the verification of an individual on the DOS Lists.

**Kentucky Cabinet for Health and Family Services, Department for Medicaid Services (DMS)
List of Excluded Providers**

- KY DMS Provider Termination and Exclusion List:
<https://chfs.ky.gov/agencies/dms/dpi/pe/Pages/terminated.aspx>

Indiana Family and Social Services Administration List of Terminated Providers

- IN Medicaid and CHIP Provider Termination List:
<https://www.in.gov/fssa/ompp/provider-information4/termination-of-provider-participation-in-medicaid-and-chip/>