ANTI-TERRORISM AND DEBARMENT SEARCH GUIDE

Before signing a subaward, purchasing commercial goods and services, or hiring staff and consultants with U.S. Government funded awards, you are required to check the following three sources and document the search results to ensure that the relevant entities do not have any connections with the financing of terrorism activities and that there are no other sanctions against them (for commercial goods and services refer to Procurement at a Glance for mandatory search requirements).

- 1. **System for Award Management (SAM)** Contains the Excluded Parties List System and details entities excluded by the US government.
- U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) Maintains a Financial Sanctions List detailing individuals (Specially Designated Nationals) and companies owned or controlled by targeted foreign countries.
- The United Nations Security Council (UN) Maintains a Sanctions List that lists excluded entities, in an effort to maintain international peace and security.

This guide explains how to conduct searches with each of these systems to guarantee that FHI 360 does not carry out business with any such excluded entities and, therefore, does not violate US government or United Nations regulations.

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Documentation Requirements

Documentation of an excluded parties list screening (EPLS) can be in the form of pdf exports from the screening site, or screenshots of the results screen. However, they must each include the following elements:

- Screening site
- Search criteria with name of individual or entity being screened
- Search result (including statements of "no matches found", "no returned results", "no records found", etc.)
- Date search was performed



Managing Potential Matches

In the event a screening produces a potential or exact match, those findings must be escalated to authorized personnel for review and resolution.

General Services Administration's System for Award Management (SAM)

1. Navigate to SAM.gov's Exclusions page (<u>https://sam.gov/content/exclusions</u>) and click the Advanced Search option.

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Exclusion record identi subcontracts, and certain benefits. Exclusions are al	fies parties excluded from receiving Federal cont types of Federal financial and non Financial assi so referred to as suspensions and debarments.	racts, certain stance and Getting started for fede managers.	tral exclusions	
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Exclusions Resources	Download Data Files	Connect to Data Services	Help	
Types of exclusions Legacy CT Codes Agency exclusions points of contact	 Downloading exclusions files Ø Understanding the exclusions extract Ø Go to exclusions downloads 	 How to use data services @ Data services quick start guide @ Video: Using data services @ Gata public methyleigne @ II P 	 Frequently Asked Questio Glossary Terms & Videos & 	ns 🛛

2. Search criteria filters will then be listed on the left side of the page. Enter the entity's full legal name in the Excluded Entity filter, or the individual's full legal name in the Excluded Individual filter (whichever is applicable), and press Enter. The system will automatically associate the corresponding Unique Entity ID (UEI) number (if available), which should then be verified for accuracy. Otherwise, the UEI number may be inserted into the Unique Entity ID filter in addition to the name filter for a more precise search. If an entity does business under multiple names (for example, "Institute for Democratic Governance" is also known as "IDEG"), each version of the business name can be added to the filter.

NOTE – Using the main "Search" box or "Keywords" search box will yield a significantly larger number of results as the search engine will return matches for each word individually.



FILTERS PANE

SAMPLE FILTERS

Filter By	-	Excluded Entity
Keyword Search		Entity Name
For more information on how to use our keywor nelp guide 🖸	rd search, visit our	
Any Words ①		Unique Entity ID: WECLWKUFJ3E4
All Words ①		IDEG
Exact Phrase (1)		
		Unique Entity ID
e.g. 123456789, Smith Corp		e.g. HTYR9YJHK65L
Classification		
Excluded Individual	~	
Excluded Entity	~	
Federal Organizations		
Exclusion Type	~	
Exclusion Program	~	
Location	~	
Dates	~	
	Reset	

3. Search results will appear to the right of the filters (if any). Additional filters may be applied to refine large volumes of search results.

me Search Data Bank Data Services He	
rch All Words • e.g. 1606N020Q02	٩
elect Domain () http://formation () Entities () Disaster Response Registry Responsibility / Qualification ()	No matches found We couldn't find a match for your search criteria. Please try another search or go back to previous results. Go Back
Exclusions	



• For searches that result in many results, the list must be sorted by "Relevance". This means the list will start with the most relevant entity based on the criteria that was used to search on, and as the list continues the entities become less relevant. If the desired entity does not appear at the top of the list, there are no exclusions for that entity.

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me Search Data Bank Data Services	Help			
arch All Words • e.g. 1606N020Q02	Q			
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	ISLAMIC ALLIANCE OF D	EMOCRATIC FORCES • A	tive	Exclusion
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Entities				Termination Date
Disaster Response Registry	ALLIED DEMOCRATIC FO	ORCES Active		Exclusion
Responsibility / Qualification	Unique Entity ID FUZAW6NUAFT1	CAGE Code (blank)	Physical Address North Kivu Province, COD	Classification Special Entity Designation
Exclusions				Activation Date Termination Date Indefinite
	SERB DEMOCRATIC PAR	TY Active		Exclusion
Fitter By	Unique Entity ID MHC9WFRNAN33	CAGE Code (blank)	Physical Address Kralja Alfonsa XIII, 78000 Banja Luka, BIH	Classification Special Entity Designation Activation Date
Keyword Search				Termination Date Indefinite
or more information on how to use our keyword search, visit ou	DEMOCRATIC FRONT FO	OR THE LIBERATION OF PA	LESTINE Active	Exclusion
nelp guide 🗹	Unique Entity ID	CAGE Code	Physical Address	Classification

• For **searches that produce exclusion matches**, click the entity's name to open the exclusion record for further research.

SAM.GOV*				€ Sign In
ome Search Data Bank Data Services	Help			
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, and by	DUNS Unique Entity ID (blank)	CAGE Code (blank)	Physical Address 292	Classification Special Entity Designation Activation Date
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Federal Organizations	(blank)	CAGE Code (blank)	Physical address CORNER OF AHLONE ROAD & KANNAR ROAD, RANGOON, MMR	Classification Special Entity Designation Activation Date Mar 25, 2021
Enter Code or Name	(blank)			Termination Date Indefinite
Status	MYANMA ECONOMIC HOLE	DINGS PUBLIC COMP	ANY LIMITED • Active	Exclusion
Active	DUNS Unique Entity ID (blank)	CAGE Code (blank)	Physical Address 51*MAHABANDOOLA ROAD 189/191, RANGOON, 11161 MMR	Classification Special Entity Designation
Reset Ö	SAM Unique Entity ID (blank)			Mar 25, 2021 Termination Date Indefinite
	MYANMAR ECONOMIC COR	PORATION • Active		Exclusion
	DUNS Unique Entity ID (blank)	CAGE Code (blank)	Physical Address 292	Classification Special Entity Designation
				Activation Date



4. Save a copy of the results by right-clicking the page and select the browser's "Print" option. All saved copies must display the Screening site, the search criteria with name of individual or entity being screened, the search result (including statements of "no matches found", "no returned results", "no records found", etc.), and the date the search was performed.

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For more information on how to use our keyword search, visit our	DEMOCRATIC FRONT FOR TH	E LIBERATION OF PALESTINE • Active	_	Exclusion
help guide 🕼	Unique Entity ID	CAGE Code Physical Add	iress	Classification

- If the date does not appear in the saved/print version, use the browser's print settings to include the "headers and footers" option.
- And for screenings that produce many results, ensure the *Sort by* filter is also displayed, as "Relevance".

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INSTITUTE FOR DEMOCRA Unique Entity ID: WECLAR	ITIC GOVERNANCE D/0384	×			
Unique Entity ID					_
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U.S. Department of the Treasury's OFAC Sanctions List Search

- 1. Navigate to the OFAC Sanctions List Search (<u>https://sanctionssearch.ofac.treas.gov/)</u>.
- 2. Enter the entity or individual's full legal name into the **Name** box. If the entity does business under an acronym (for example, *Institute for Democratic Governance* uses the acronym "IDEG"), two separate searches must be conducted.
- 3. Click Search.



Office of Foreign Assets Co	Sanctions Lis	st Search		
pecially Designated Nationals and Blocked Perso ancions Act List, the Sectoral Sanctions Identific alestiman Legislative Council List, Given the num sociated with each returned record. These progra- miting possible markets between word or charact mictions lists. Sanctions List Search has a sideri- fic Class not provide recommendations with reg ind/or the various other sanctions lists, use of San- dro the various other sanctions lists, use of San- tions act underlands are studied.	ns list ("SDN List") and all other sanctions lists admini- tations List, the List of Foreign Financial Institutions Sui ber of lists than conveside in the Sanctions List Search am codes indicate how at two hit on a returned value s or athings an entered into Sanctions List Saarch, and a arr that may be used to set a threshold (i.e., a confide at the two perpresentations of any specific confidence at to the appropriatences of any specific confidence closes List Search is not a substitute for undertaking an in reliance on the use the south set.	stared by OFAC, including the bject to Correspondent Account houl, it is strongly recommend hould be treated. The Sanctior may name or name component ner raing) for the closeness of r, or proximate, matches, base raing. Sanctions List Search is ppropriate due diligence. The u	Foreign Sanctions Evaders List, the Non-SI or Payable-Through Account Sanctions are de that users pay close attention to the pro- se List Sarch tool uses approximate string as It appears on the SDN List and/or the va- am potential match returned as a result of the loo of direct to assist us this in utilizing one loo of direct to assist us this in utilizing one of Sanctions List Search does not limit at	DN Iran dithe Non-SDN gram codes matching to rious other a user's search. ia the silder-bar. the SDN List any criminal or
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4. The results will then appear in the bottom pane (if any).

Patestinian Legislative Council List Given the number associated with each returned record. These program- identify possible matches between word or characters a sanctions list. Sanctions List Saracth has a side-bar Sanctions List. Sanctions List Saracth has a side-bar for CPLC does not provide recommendations with regard and/or the various other sanctions list; use of Sanctio civil lisbility for any act undertaten as a result of, or in	of lists had now reside in the Sanctions List Search observations are the one a true the one a returned value shi trings as entered into Sanctions List Search, and an that may be used to set a threshold (i.e., a confidence r other incorrectly entered text, and will return near, to the appropriateness of any specific confidence ras List Search is not a substitute for undertaking app eliance on, such use.	ool, it is strongly recommend puld be treated. The Sanction y name or name component a e rating) for the closeness of or proximate, matches, based ing. Sanctions List Search is ropriate due diligence. The u	ed that users pay close attent a List Search tool uses appro- is it appears on the SDN List ; any potential match returned ; on the confidence rating set one tool offered to assist user as of Sanctions List Search do	conclusion of the program co- cimate string matching and/or the various off as a result of a user's by the user via the sli by the user via the sli s in utilizing the SDN bes not limit any crimi	des to er search. fer-bar. List hal or
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5. Save a copy of the results by right-clicking the page and select the browser's "Print" option. All saved copies must display the Screening site, the search criteria with name of individual or entity being screened, the search result (including statements of "no matches found", "no returned results", "no records found", etc.), and the date the search was performed.





 If the date does not appear in the saved/print version, use the browser's print settings to include the "headers and footers" option.





- Navigate to the United Nations Security Council Consolidated List Search (<u>https://scsanctions.un.org/search/</u>).
- Insert the full legal name of the entity or individual into the Enter keywords box and click Search. If the entity uses an acronym (for example, *Institute for Democratic Governance* uses the acronym "IDEG"), two separate searches must be conducted. To search for an exact phrase, enclose the phrase in quotation marks.

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	Enter keywords	A "Institute for Democratic Governance"	
		You can enter more than one word to search separated by space. For example: <u>case 1:</u> <i>if you</i> enter John Doe the results shown will consist of individuals or "Doe". If you are searching for an exact phrase include it between quotes "you mandatory when Advanced search options are used. For best results search words entered must be at least 3 characters long.	entities that contain the word "John" or ur phrase here". The field is not
		Search	

3. Once the results are generated, click Ctrl+F to search the results for the entity or individual's name. If no matches are found, that is an indication that no records of concern have been found for the entity or individual being screened. Capture a screenshot of the results page with that second search box included. The screenshot must also include the screening site name, the search criteria with the name of the individual or entity being screened, the search result (including statements of "no matches found", "no returned results", "no records found", etc.), and the date the search was performed.



	institute for democratic governance 0/0	• • • ×
	United Nations Security Council Consol	ida
Generated on: 2 April 2023		Use Ctrl + F to search results.
"Generated on refers to the date on which the user access updates are provided on the Council / Committee's webs	ed the list and not the last date of substantive update t ite."	"0/0" indicates "No Records Found".
Composition of the List		
The list consists of the two sections specified below: A. <u>Individuals</u> B. <u>Entities and other groups</u>		
Information about de-listing may be found at: https://www.un.org/securitycouncil/ombudsperson(for re https://www.un.org/securitycouncil/content/2231/list(for https://www.un.org/securitycouncil/content/2231/list(for	s. 1267) or other Committees) res. 2231)	
A. Individuals		
CDL001 Name: 1: ERIC 2: BADEGE 3: na 4: na Title: na Designation: na DOB: 1971 POB: na Good q na National identification no: na Address: Rwanda (as Rwanda in March 2013 and is still living there as of early we-work/Notices/View-UN-Notices-Individuals click he	uality a.k.a.: na Low quality a.k.a.: na Nationality: of early 2016) Listed on: 31 Dec. 2012 (amended on 2 2016. INTERPOL-UN Security Council Special Not E	Democratic Republic of the Congo Passport no: 13 Oct. 2016) Other information: He fled to ice web link: https://www.interpol.int/en/How-
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[END]

