

## 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.
2. **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.
3. **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:

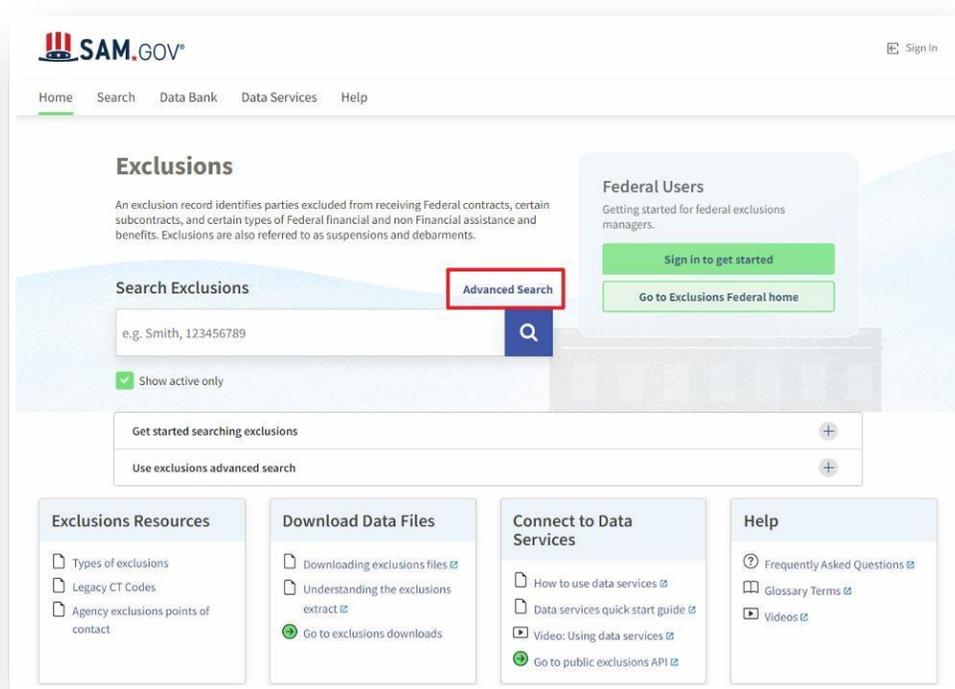
- Screening site
- Search criteria with name of individual or entity being screened
- Search result (including statements of “no matches found”, “no returned results”, “no records found”, etc.)
- Date search was performed

## 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)

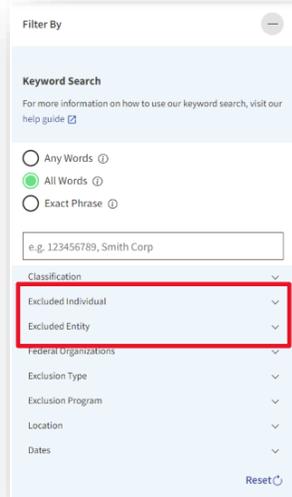
1. Navigate to SAM.gov's **Exclusions** page (<https://sam.gov/content/exclusions>) and click the **Advanced Search** option.



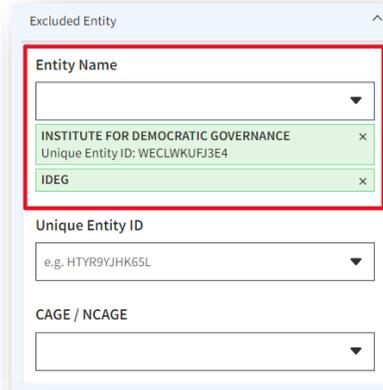
2. Search criteria filters will then be listed on the left side of the page. Enter the entity's full legal name in the **Excluded Entity** filter, or the individual's full legal name in the **Excluded Individual** filter (whichever is applicable), and press **Enter**. The system will automatically associate 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.

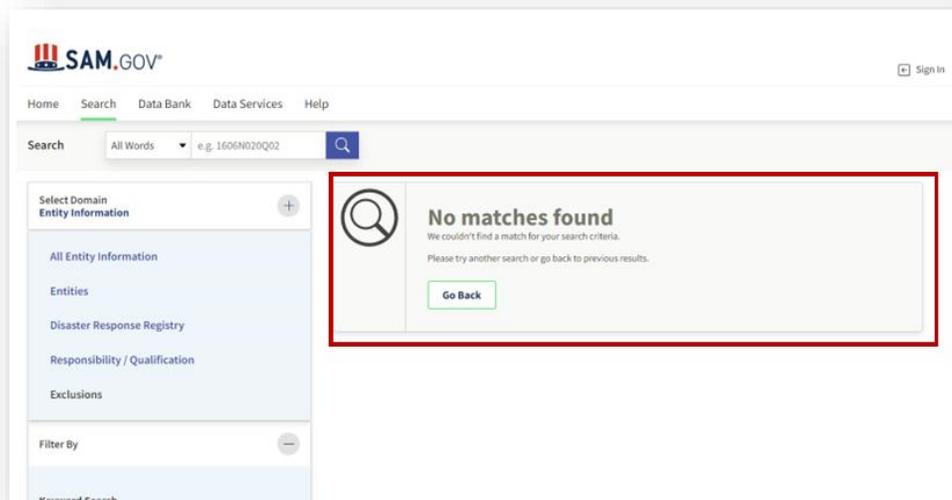
### FILTERS PANE



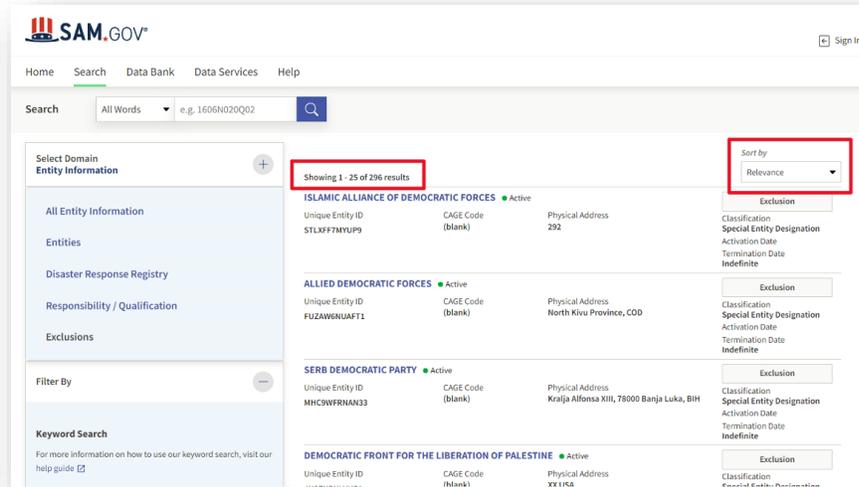
### SAMPLE FILTERS



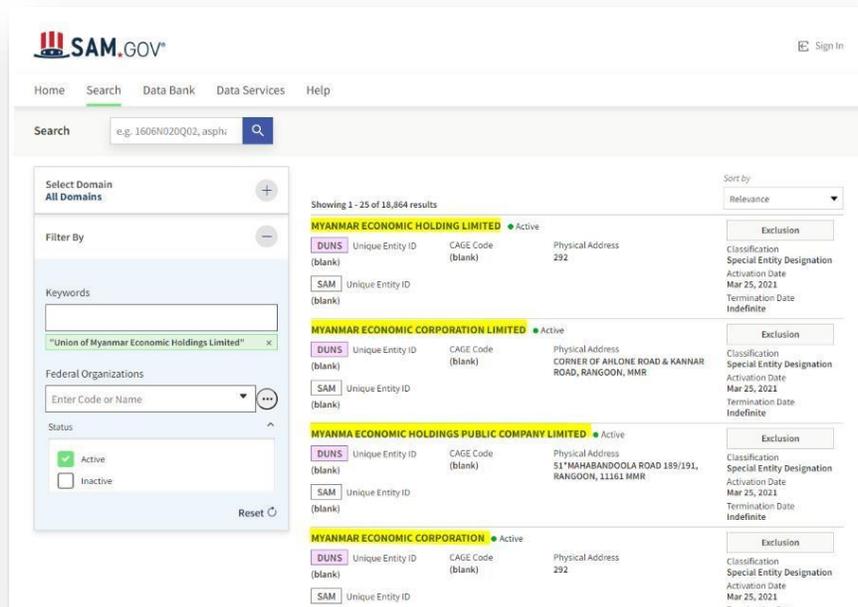
3. Search results will appear to the right of the filters (if any). Additional filters may be applied to refine large volumes of search results.



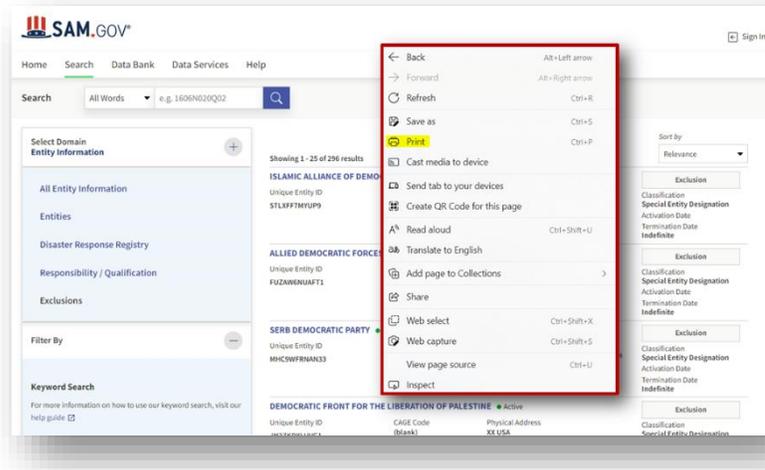
- For searches that result in many results, the list must be sorted by “Relevance”. This means the list will start with the most relevant entity based on the criteria that was used to search on, and as the list continues the entities become less relevant. If the desired entity does not appear at the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



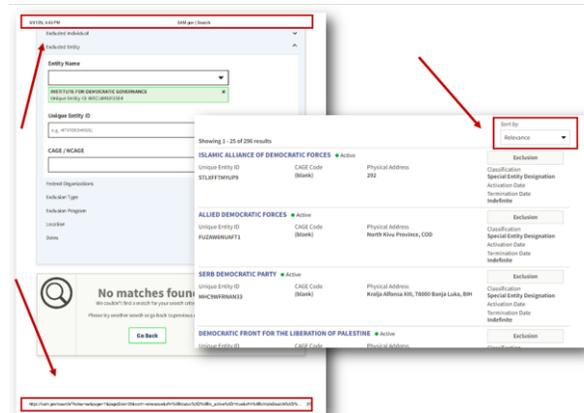
- For searches that produce exclusion matches, click the entity’s name to open the exclusion record for further research.



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.



- 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”.



**U.S. Department of the Treasury’s OFAC Sanctions List Search**

1. Navigate to the OFAC Sanctions List Search (<https://sanctionssearch.ofac.treas.gov/>).
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**.

**OFAC**  
Office of Foreign Assets Control

### Sanctions List Search

Special Designated Nationals and Blocked Persons List ("SDN List") and all other sanctions lists administered by OFAC, including the Foreign Sanctions Evaders List, the Non-SDN Iran Sanctions Act List, the Sectoral Sanctions Identifications List, the List of Foreign Financial Institutions Subject to Correspondent Account or Payable-Through Account Sanctions and the Non-SDN Palestinian Legislative Council List. Given the number of lists that now reside in the Sanctions List Search tool, it is strongly recommended that users pay close attention to the program codes associated with each returned record. These program codes indicate how a true hit on a returned value should be treated. The Sanctions List Search tool uses approximate string matching to identify possible matches between word or character strings as entered into Sanctions List Search, and any name or name component as it appears on the SDN List and/or the various other sanctions lists. Sanctions List Search has a slider-bar that may be used to set a threshold (i.e., a confidence rating) for the closeness of any potential match returned as a result of a user's search. Sanctions List Search will detect certain misspellings or other incorrectly entered text, and will return near, or proximate, matches, based on the confidence rating set by the user via the slider-bar. OFAC does not provide recommendations with regard to the appropriateness of any specific confidence rating. Sanctions List Search is one tool offered to assist users in utilizing the SDN List and/or the various other sanctions lists; use of Sanctions List Search is not a substitute for undertaking appropriate due diligence. The use of Sanctions List Search does not limit any criminal or civil liability for any act undertaken as a result of, or in reliance on, such use.

[Download the SDN List](#)      [Sanctions List Search: Rules for use](#)      [Visit The OFAC Website](#)  
[Download the Consolidated Non-SDN List](#)      [Program Code Key](#)

**Lookup**

Type: All  
Name: Institute for Democratic Governance  
ID # / Digital Currency Address:  
Program: BALKANS-EO14033  
Minimum Name Score: 100

Address:  
City:  
State/Province:  
Country: All  
List: All

**Search**    **Reset**

4. The results will then appear in the bottom pane (if any).

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**Lookup**

Type: All  
Name: institute for democratic governanc  
ID # / Digital Currency Address:  
Program: BALKANS-EO14033  
Minimum Name Score: 100

Address:  
City:  
State/Province:  
Country: All  
List: All

**Search**    **Reset**

**Lookup Results: 0 Found**

Name	Address	Type	Program(s)	List	Score
Your search has not returned any results.					

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.

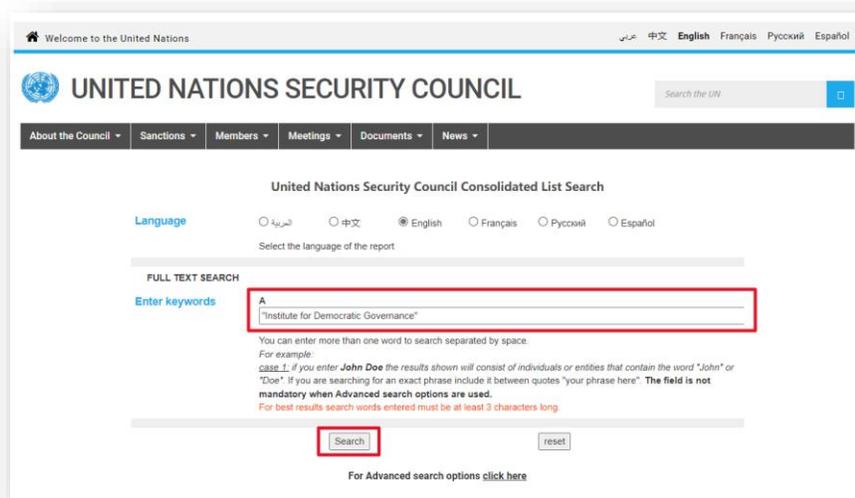


- If the date does not appear in the saved/print version, use the browser's print settings to include the "headers and footers" option.



## UN Security Council Sanctions List

1. Navigate to the United Nations Security Council Consolidated List Search (<https://scsanctions.un.org/search/>).
2. 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.



The screenshot displays the United Nations Security Council Consolidated List Search page. At the top, there is a navigation bar with the UN logo and the text 'UNITED NATIONS SECURITY COUNCIL'. Below this is a search bar with the placeholder text 'Search the UN'. The main content area is titled 'United Nations Security Council Consolidated List Search'. It features a language selection section with radio buttons for Arabic, Chinese, English (selected), French, Russian, and Spanish. Below this is a 'FULL TEXT SEARCH' section with a label 'Enter keywords'. A search box contains the text 'Institute for Democratic Governance' and a 'Search' button. Below the search box, there is a 'reset' button and a link for 'Advanced search options'. The page also includes a footer with the text 'For Advanced search options click here'.

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 Consolidated List

Generated on: 2 April 2023

"Generated on refers to the date on which the user accessed the list and not the last date of substantive update. Updates are provided on the Council / Committee's website."

**Composition of the List**

The list consists of the two sections specified below:

A. [Individuals](#)

B. [Entities and other groups](#)

Information about de-listing may be found at:

<https://www.un.org/securitycouncil/ombudsperson/> (for res. 1267)

<https://www.un.org/securitycouncil/sanctions/delisting/> (for other Committees)

<https://www.un.org/securitycouncil/content/2231.html> (for res. 2231)

A. Individuals

**CDI.001 Name:** 1: ERIC 2: BADEGE 3: na 4: na  
**Title:** na **Designation:** na **DOB:** 1971 **POB:** na **Good quality a.k.a.:** na **Low quality a.k.a.:** na **Nationality:** Democratic Republic of the Congo **Passport no:** na **National identification no:** na **Address:** Rwanda (as of early 2016) **Listed on:** 31 Dec. 2012 ( amended on 13 Oct. 2016 ) **Other information:** He fled to Rwanda in March 2013 and is still living there as of early 2016. INTERPOL-UN Security Council Special Notice web link: <https://www.interpol.int/en/How-we-work/Notices/View-UN-Notices-Individuals> [click here](#)

**CDI.002 Name:** 1: FRANK KAKOLELE 2: BWAMBALE 3: na 4: na

[END]