



MEMORANDUM

To: Faculty and Staff
From: Karen Royal, Director of Compliance
Date: April 26, 2017
Subject: Export Controls Compliance Program—Phase Implementation
Phase 4 – Business Functions

Summary: Departments requesting invoicing or wire transfers to non-employee foreign persons or entities must submit a copy of the completed Restrict Party Screening (RPS) results to the Accounting Services office. Requesting parties must submit a RPS request form to their department/college delegate for required screenings.

Detail: As previously indicated, implementation of the Texas A&M University—Kingsville (TAMUK) Export Controls Compliance Program will be completed in phases. Phase 4, Business Functions, is outlined in Section 11.0 of the TAMUK Export Controls Compliance Program Manual.

Vendors: TAMUK departments that use BUY A&M (BAM) will have RPS completed by Texas A&M University for all international non-employee vendors in accordance with their internal procedures. TAMUK departments not using BAM will request that their department's assigned delegate complete required screenings and print out the notification that indicates they did their due diligence and are able to use said vendor.

Wire Transfers: Restricted Party Screenings will be conducted for all international wire transfers by the department/college delegate assigned to the requesting department. Once all required documentation is received by the Accounting Services office they will begin the wire transfer process. The university will utilize Flywire (formerly peerTransfer) to make payments to student accounts by international wire transfer. Flywire has strict internal controls and insurance programs in place to ensure funds are safe. Flywire also enforces strict information security and privacy policies. All names and addresses of senders will be passed through certified checkpoints using the LexisNexis database and risk management solutions.

Accounts Receivables: Departments invoicing foreign persons or entities will contact their assigned delegate before sending the invoice or invoice request. Once the assigned delegate receives the appropriate documentation he/she will then conduct RPS and respond to the requesting department with a notification of the completed RPS. Once all of the required documentation is received, Accounting Services will proceed with accepting the incoming international wire transfer.

References:

- *Export Controls Compliance Program Manual – Section 11.0*
http://www.tamuk.edu/compliance/TAMUK-Export_Controls_Manual.pdf
- *List of Export Control Delegates*
http://www.tamuk.edu/compliance/Visual_Compliance_Delegate_List.pdf
- *Restricted Party Screening Request Form*
http://www.tamuk.edu/compliance/documents/104_RPS_Request_Form.pdf

For further export controls assistance, please direct questions to the Office of Compliance at ExportControls@tamuk.edu.

Thank you,

Karen B. Royal, J.D., CCEP
Director of Compliance
Texas A&M University-Kingsville