Abnormal Activity Monitoring

A CU*BASE® Due Diligence Tool for Monitoring High Risk Activity among Your Membership

INTRODUCTION

In response to growing trends of both elder abuse and online banking fraud, the FFIEC and CFPB are now urging credit unions to keep a closer eye on abnormal and high risk activity among members.

The Abnormal Activity Monitoring tool is one answer to this recommendation. This new tool helps your staff do their due diligence when it comes to fraud and monitoring special situations by automatically sifting through member transactions to find those that are abnormal or high risk according to the parameters set by your credit union. Read more to find out how to start using this powerful new tool.

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CONFIGURING ABNORMAL ACTIVITY SETTIN\[\text{\textit{G}}\text{GS}\\

BEFORE YOU BEGIN

Before you can begin your due diligence and monitoring abnormal activity for a specific group of members (member group), you’ll first need to:

- Decide which types of members (Member Designations) you’d like to watch more closely (business owners vs. individuals, etc.)
- Decide which types of transactions (Origins) you’d like to monitor for your member group (ATM, credit, etc.); it’s recommended to set up the same Origin groups for each member group that you create. The Origin Codes that follow are ones that you’d most likely want to monitor for abnormal activity:

<table>
<thead>
<tr>
<th>Origin Code</th>
<th>Description</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>01</td>
<td>Teller Processing</td>
<td>Activity posted in your lobby by tellers</td>
</tr>
<tr>
<td>02</td>
<td>Share Draft from Bank Process</td>
<td>This includes all checks posted to member accounts via daily share draft processing, <strong>including member checks processed via It’s Me 247 Bill Pay (Fiserv) and via It’s Me 247 Bill Pay (Payveris)</strong></td>
</tr>
<tr>
<td>03</td>
<td>Loan Department Processing</td>
<td>Monitored primarily to watch for signs of “layering” – a member making higher-than-normal payments on a LOC for the purpose of later wire transferring large sums out of the account</td>
</tr>
<tr>
<td>09</td>
<td>Wire transfers</td>
<td>Includes wire transfers.</td>
</tr>
<tr>
<td>11</td>
<td>ACH Network Processing</td>
<td>ACH activity, including debits for online bill payments that are processed via <strong>It’s Me 247 Bill Pay (Fiserv)</strong></td>
</tr>
<tr>
<td>13</td>
<td>ATM Network Processing</td>
<td>These Origin codes are generally monitored together since ATM and debit card transactions are so similar.</td>
</tr>
<tr>
<td>16</td>
<td>Debit Card Processing</td>
<td>Includes bill payment activity for It’s Me 247 Bill Pay (iPay) ONLY</td>
</tr>
<tr>
<td>20</td>
<td>Bill Pay Processing</td>
<td>Includes both CU*Talk Audio Response and It’s Me 247 Online Banking transaction activity</td>
</tr>
<tr>
<td>22</td>
<td>Credit Card Processing</td>
<td>Activity for CU*BASE online credit cards only</td>
</tr>
</tbody>
</table>

- Define the ranges (number of transactions and dollar amount) of a month’s worth of transaction activity that you would consider normal, abnormal, and high risk for the group (see Page 12).
When considering transaction numbers for a normal range, keep in mind that the Combined Transaction Amount fields count all debits and credits together. For example, a credit of $100 and a debit of $100 will equal two transactions and $200 of money moved.

Also keep in mind that different membership types will have different amounts. For example, organizational accounts might typically deposit significantly more checks than individual members do, the norms for organizations must be set up differently.

- Regularly use the Abnormal Activity Monitoring inquiry tool to monitor each member group you’ve configured. See Page 15.

**SETTING UP MEMBER GROUPS**

To set up member groups, follow the directions below.

1. Access **Tool #101 Abnormal Activity Monitoring Config**.

2. Select **Add Mbr Grouping** (F6).

3. In the **Description** field, enter the name you’d like to give this group.

   For example, if you’d like to monitor memberships that have a fiduciary obligation such as members who are managing an account for someone who is elderly, disabled, or a minor, then you might enter a description of “Fiduciary.”
4. Click the Select button next to the Used for monitoring membership designation(s) field.

5. Under the Description heading, click the membership types (Membership Designation Codes) you’d like to monitor. To select more than one code, simply hold the Control key and click your other selections.

   The groups should be set up to include membership designations that have similar patterns of activity. For example, you wouldn’t want to put in one member group organizational and individual accounts, because the transaction numbers for organizational accounts will typically be much higher than those for individual accounts.

   In order to be as efficient as possible when monitoring members, it’s best to avoid including the same Membership Designation Code in more than one group, because that would cause you to monitor the same member more than once.
6. Use Select.

7. Select Add Origin Group (F6) in order to select the Origin (transaction type) you’d like to monitor for your new group.

   For more information on Origin groups, see Page 4.

8. Use the Select button next to the Transaction Origin codes field.
9. Select the Origin (transaction type) you’d like to monitor.

   It’s recommended that you set up the same Origin groups for each member group that you create. See Page 4 for a list of recommended Origin groups to monitor.

10. Use Select.

11. In the Origin group description field, enter a description for your Origin group. This can be the same as the Origin Code itself, or whatever label helps you remember the category of transactions being monitored (like “Lobby” for your teller-line activity).
12. In the To fields under the Transaction Counts heading, enter the highest number of transactions that your credit union considers to be normal, abnormal, and high-risk.

- For information on figuring out your ranges, see Page 12.

13. In the To fields under the Combined Transaction Amount heading, enter the highest dollar amount of transactions that your credit union considers to be normal, abnormal, and high-risk for the type of membership(s) and transaction(s) you're planning to monitor.

14. Use Enter to save your changes.
15. Add the rest of your Origin groups by again selecting Add Origin Group (F6).

16. If you’re satisfied with your configuration settings, click Save/Update (F5).
You will then see your new group in the list of member groups on the next screen.
DETERMINING ACCURATE TRANSACTION RANGES

For assistance in figuring out your transaction ranges for what your credit union considers “normal,” “abnormal,” and “high-risk,” activity patterns, use the option below.

When considering transaction numbers for a normal range, keep in mind that the Combined Transaction Amount fields count all debits and credits together. For example, a credit of $100 and a debit of $100 will equal two transactions and $200 of money moved.

Also keep in mind that different membership types will have different amounts. For example, organizational accounts might typically deposit significantly more checks than individual members do, the norms for organizations must be set up differently.

Figuring out your ranges may require multiple adjustments after you begin using the monitoring tool since, as you learn more about how many “hits” you get, you may need to either narrow down the list some more or expand it to catch a broader range of activity.

SAMPLING/COMPARISON DASHBOARD

The most useful tool you’ll find in helping you figure out transaction ranges is the Transaction Activity Summary Compare sampling dashboard.

1. To access this dashboard, access Tool #775 Sample Transactions by Delivery Channel.
2. Then click **Go!** next to an analysis method.

3. Click **Summary Compare** (F9).

4. You will then be brought to the Transaction Activity Summary Compare dashboard shown below.

You may want to look at the top ten and the bottom ten for clues as to what is normal and what is not. Click on the header row to sort by the column.
By clicking the lookup button next to an individual member’s account number, you will be brought to the Current Month Activity Compare dashboard. See Page 31 for more information about this dashboard.

14 Abnormal Activity Monitoring
MONITORING ACTIVITY FOR A MEMBER GROUP

Need to perform your required due diligence on certain membership types such as large-volume or corporate accounts? Looking for high-risk behavior patterns among your membership? Do so quickly and easily using the Abnormal Activity Monitoring dashboard, which is explained below.

1. Go to Tool #537 Monitor Abnormal Transaction Activity.

2. Click the lookup button next to the Member group to monitor field.

Monitoring Options

- View Members with Certain Due Diligence Flag (See Page 19.)
- Flag Members in a Certain Age Range (See Page 21.)
- Export List of Members to Member Connect or Query (See Page 22.)
- Go to Inquiry Screen of a Specific Member on List (See Page 24.)
- Review Tracker Conversations of a Specific Member on List (See Page 24.)
- View Transaction Information for a Specific Member on List (See Page 26.)
- Print or View List in Report Format (See Page 27.)
- View Configuration Settings (See Page 28.)
3. Select the member group whose activity you’d like to monitor.

4. Click Select.

5. On this next screen, Monitor Abnormal Activity, you are now able to view transaction information (total transactions, total dollar amounts, and average dollar amounts) for the transaction(s) and membership type(s) configured for this member group.

   For example, if you selected to monitor activity for the Fiduciary member group, then you will see on this next screen (shown below) all activity considered abnormal and high risk for this particular member group, which consists of Custodial, Guardianship, Representative Payee, and Trust membership types.

   Keep in mind that you will only see the transaction types (Origins) that were configured for this member group, which are teller, share draft, loan, ACH, ATM/debit, EasyPay, credit card, and audio response transactions.

   Member activity will appear on the dashboard as “abnormal” or “high risk” based on the member’s transaction count and/or total transaction dollars. If a member’s activity under any particular Origin group happens to fall within two different risk level ranges (i.e., the transaction count shows it as “abnormal” but the $ amount makes it fall into the “high risk” range), the higher of the two levels will be shown.
### Field Descriptions

<table>
<thead>
<tr>
<th>Field Name</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Member group to monitor</td>
<td>Allows you to select a group (one only) to monitor</td>
</tr>
<tr>
<td>Monitor transaction from</td>
<td>Allows you to select the current month or up to three months prior for monitoring activity</td>
</tr>
<tr>
<td>Flag if member age is below/or above</td>
<td>Allows you to flag members of certain ages – helps in detecting elder abuse to see if someone is tampering with their finances</td>
</tr>
</tbody>
</table>
| Include all activity for members with DD flag  | Allows you to view all activity for only those members in your membership group with the Due Diligence Code you specify  
For further details and an example of how this option works, see Page 19. |
<p>| DD                                             | Shows the member’s Due Diligence flag status                                                                                              |
| Account                                        | Shows the member’s account number                                                                                                          |
| Member Name                                    | Shows the member’s name                                                                                                                    |
| Age                                            | Shows the member’s age                                                                                                                     |
| *                                              | Shows up next to the ages within the range you entered if you entered an age range in the Flag if member age is below/or above field        |
| Origin                                         | Shows the transaction type (Origin) being monitored for this member group, based on your configuration (see Page 4)                           |
| # Trans                                        | Shows the total number of transactions the member made in the time period selected in the Monitor transactions from drop-down menu          |</p>
<table>
<thead>
<tr>
<th><strong>Field Name</strong></th>
<th><strong>Description</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Trans Dollars</td>
<td>Shows the total amount of all transactions the member made in the time period selected in the <em>Monitor transactions from</em> drop-down menu</td>
</tr>
<tr>
<td>Avg Trans Amount</td>
<td>Shows the average dollar amount of all transactions made in the time period selected in the Monitor transactions from drop-down menu</td>
</tr>
<tr>
<td>Risk Level</td>
<td>Shows the member’s risk level according to the ranges that define what is considered normal, abnormal, and high risk activity</td>
</tr>
<tr>
<td>Last AT Tkr</td>
<td>Shows the Memo Type and date of the last Audit Tracker (AT) conversation note recorded for that member</td>
</tr>
<tr>
<td>By</td>
<td>Shows the Employee ID of the employee who entered the last Tracker for that member</td>
</tr>
<tr>
<td>Inquiry</td>
<td>Brings you to the Inquiry screen of the member you selected from the list (see Page 24)</td>
</tr>
<tr>
<td>Tracker Review</td>
<td>Brings you to the Tracker Review screen so you can view or enter new Tracker notes for that member</td>
</tr>
<tr>
<td>Activity Analysis</td>
<td>Brings you to a summary screen where you can view daily averages and monthly totals for transactions the member conducted over the current and past three months (see Page 30)</td>
</tr>
<tr>
<td>Total # records</td>
<td>Shows the total number of members on your list</td>
</tr>
<tr>
<td></td>
<td>Keep in mind that if you select other Due Diligence codes, it will include those records in the total amount, so the <em>Total # records</em> field will not always equal the sum of the <em>Total # abnormal</em> and <em>Total # high risk</em> fields.)</td>
</tr>
<tr>
<td></td>
<td>This field represents the number of records, not the number of members, a record being one Origin Code group where the summarized transaction count and/or $ amount fell within a monitored range.</td>
</tr>
<tr>
<td>Total # abnormal</td>
<td>Shows the number of members whose transaction ranges are abnormal (either by total count or total dollar amount) according to the ranges configured</td>
</tr>
<tr>
<td>Total # high risk</td>
<td>Shows the number of members whose transaction ranges are high risk (either by total count or total dollar amount) according to the ranges configured</td>
</tr>
</tbody>
</table>

**Buttons**

<table>
<thead>
<tr>
<th><strong>Command Key</strong></th>
<th><strong>Description</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Export (F9)</td>
<td>Allows you to generate a list (database file) of just those members listed on your dashboard so that you may use the list in conjunction with Member Connect for marketing purposes or Query for research purposes (see Page 22)</td>
</tr>
<tr>
<td>Member Connect</td>
<td>Brings you to the Member Connect entry screen so that you can enter your file name and communicate with the members listed in that file, if you’ve already generated a</td>
</tr>
<tr>
<td>Command Key</td>
<td>Description</td>
</tr>
<tr>
<td>-----------------------------</td>
<td>-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>list/database file of the members listed on your dashboard (see Page 23)</td>
<td><strong>Print Report (F14)</strong>: Allows you to print or view in your spool file a report showing all members listed on your Abnormal Activity dashboard. (Note: The printed report automatically sorts by Due Diligence Code, the highest code being first. It will not display any sort settings you choose. It will, however, display the age-flag filter.)</td>
</tr>
<tr>
<td>View Configuration (F15)</td>
<td>Brings you to a screen where you can select a member group and view the configuration settings (what’s considered normal, abnormal, and high risk) for that particular group</td>
</tr>
<tr>
<td>Refresh List (Enter)</td>
<td>Same as pressing Enter on your keyboard – good for if you select to flag an age range, after which you must press Enter or this Refresh List button in order to see an asterisk next to the ages in your range</td>
</tr>
</tbody>
</table>

**MONITORING OPTIONS**

When monitoring abnormal activity among members, you have many options in terms of how to view and what to do with the information on the Abnormal Activity dashboard. These options are explained below.

**View Members with Certain Due Diligence Flag**

You can use this tool to monitor activity for memberships you’ve marked for special attention using the configurable Due Diligence flag. Because these members warrant special attention, you can use this feature to choose which ones to view, and the system will display just those members within the member group with the due diligence flag you select. Additionally, it will show all transaction activity for those members, even if the counts/dollar amount of transactions fell within your configured “normal” range.

To use this tool, follow the instructions below.

1. Click the Select button next to the field *Include all activity for members with Due Diligence flag.*
2. From the list of Due Diligence codes, click the code (risk level) you’d like included in your list of members.

Due Diligence Codes are configured by your credit union via Tool #247 Configure Due Diligence Codes.

3. Click Select.

4. Your list will then show only those members in the Fiduciary group who have a Due Diligence code of 4, and it will show all activity for these members, not just their abnormal and high risk activity.
Flag Members in a Certain Age Range

This age-flagging tool was developed to help you keep a special eye on members based on their age, such as minors or your older members.

1. To flag (put an asterisk next to) members in a certain age range, enter the age range in the field Flag if member age is below/or above.

   Since there are certain age ranges more at risk than others, it’s recommended to always flag those age ranges in all your member groups that you monitor.

2. Use Enter. Members in the age range you selected will have an asterisk next to their age.

   TIP: Click the column heading to change the sort order so that the flagged members appear at the top of the list.
Export List of Members to Member Connect or Query

This option is the perfect marketing tool in that once you have identified a group of members that exhibit a certain pattern of behavior, you can communicate with that group about something they are likely to be interested in, based on their behavior patterns.

For example, you could promote your direct-deposit service to members who are depositing a lot of checks via the lobby.

To use this option, follow the instructions below.

1. If you’d like to export the list of members to Member Connect or Query, click Export (F9).
2. Select the location to which you’d like to export the list: Member Connect or Query.
3. Use Enter.
4. Enter a name for the list in the File name field.
5. Use Enter.

6. If you had clicked Export (F9) to export your list to Member Connect and you had entered a name for your list, then you can click Member Connect (F10) and enter the list name to communicate with just this group of members.
Go to Inquiry Screen of a Specific Member on List

This feature, accessible by clicking Inquiry, allows you to look at a member’s actual transaction history, view other miscellaneous details about the member, etc. This is a very valuable feature, because it allows you to ascertain whether or not the activity you’re seeing is actually typical for the member. Just because a member falls outside the configured norms doesn’t mean that the member’s activity isn’t normal for that particular member.
Review Tracker Conversations of a Specific Member on List

By clicking Tracker Review, you can create or review Tracker conversations for one of the members on your list.
View Transaction Information for a Specific Member on List

See Page 30 for details on this feature, accessible by clicking *Activity Analysis.*
Print or View List in Report Format

1. By using *Print Report* (F14), you can print or view the list in report format. The printed report automatically sorts by Due Diligence Code, the highest code being first. It will not display any sort settings you choose. It will, however, display the age-flag filter.

2. Select your printer and click Continue.

Your report will then display like the one below.

---

**Abnormal Activity Monitoring**

<table>
<thead>
<tr>
<th>DD Account</th>
<th>Member Name</th>
<th>Age</th>
<th>Origin</th>
<th># of Trans</th>
<th>Trans $</th>
<th>Avg Trans $</th>
<th>Risk Level</th>
<th>Last AT TKR</th>
<th>By</th>
</tr>
</thead>
<tbody>
<tr>
<td>1234</td>
<td>MEMBER, DARR</td>
<td>54</td>
<td>ACH NETW</td>
<td>2</td>
<td>200,000</td>
<td></td>
<td>HIGH RISK</td>
<td>07/12/13</td>
<td>-3</td>
</tr>
<tr>
<td>12345</td>
<td>MEMBER, JOSEPH D</td>
<td>27</td>
<td>ATM NETW</td>
<td>10</td>
<td>30,000</td>
<td></td>
<td>HIGH RISK</td>
<td>07/12/13</td>
<td>-3</td>
</tr>
<tr>
<td>12345</td>
<td>MEMBER, KATHRYN</td>
<td>35</td>
<td>ATM NETW</td>
<td>100</td>
<td>30,000</td>
<td></td>
<td>HIGH RISK</td>
<td>07/12/13</td>
<td>-3</td>
</tr>
<tr>
<td>12345</td>
<td>MEMBER, N T</td>
<td>87</td>
<td>TELLER P</td>
<td>100</td>
<td>30,000</td>
<td></td>
<td>HIGH RISK</td>
<td>07/12/13</td>
<td>-3</td>
</tr>
<tr>
<td>12345</td>
<td>MEMBER, DENNIS C</td>
<td>59</td>
<td>DEBIT CA</td>
<td>50</td>
<td>5000</td>
<td></td>
<td>HIGH RISK</td>
<td>07/12/13</td>
<td>-3</td>
</tr>
<tr>
<td>12345</td>
<td>MEMBER, IN</td>
<td>24</td>
<td>TELLER P</td>
<td>10</td>
<td>200</td>
<td></td>
<td>ABNORMAL</td>
<td>07/12/13</td>
<td>-3</td>
</tr>
<tr>
<td>12345</td>
<td>MEMBER, NORMAN</td>
<td>67</td>
<td>ACH NETW</td>
<td>24</td>
<td>1600</td>
<td></td>
<td>HIGH RISK</td>
<td>07/12/13</td>
<td>-3</td>
</tr>
<tr>
<td>12345</td>
<td>MEMBER, YVETTE M</td>
<td>44</td>
<td>AUDIO RE</td>
<td>6</td>
<td>1555</td>
<td></td>
<td>ABNORMAL</td>
<td>07/12/13</td>
<td>-3</td>
</tr>
<tr>
<td>12345</td>
<td>MEMBER, HARLEY D</td>
<td>17</td>
<td>ATM NETW</td>
<td>10</td>
<td>500</td>
<td></td>
<td>ABNORMAL</td>
<td>07/12/13</td>
<td>-3</td>
</tr>
<tr>
<td>12345</td>
<td>MEMBER, ABL</td>
<td>5</td>
<td>DEBIT CA</td>
<td>9</td>
<td>297</td>
<td></td>
<td>ABNORMAL</td>
<td>07/12/13</td>
<td>-3</td>
</tr>
</tbody>
</table>

***END OF REPORT***
**VIEW CONFIGURATION SETTINGS**

1. By clicking *View Configuration* (F15) you can view the configuration settings for the member group listed.

2. Click the member group whose configuration settings you’d like to view.

3. Click *View*.

4. Click the Origin type whose configuration settings you’d like to view.
5. You will then be able to view the configuration settings for the member group you had selected.
**USING THE ACTIVITY ANALYSIS DASHBOARD**

The Activity Analysis Dashboard is a very valuable feature, because it allows you to ascertain whether or not the activity you’re seeing is actually typical for the member. Just because a member falls outside the configured norms doesn’t mean that the member’s activity isn’t normal for that particular member.

1. To access this dashboard, use **Tool #537 Monitor Abnormal Transaction Activity**.

2. Select your member group by clicking the lookup button next to the field, *Member group to monitor*, then by clicking the member group and then Select.

3. Select the name of the member for whom you’d like to view a summary and *Activity Analysis*.

   ![Screen Shot](image)

Since the fourth line item represents transactions with a high risk level, you may want to view a summary of this member’s transaction activity.

4. You will then be brought to the Current Month Activity Compare screen.

   ![Screen Shot](image)

   *This screen can also be accessed via **Tool #775 Sample Transactions by Delivery Channel** or via the “Transaction Activity” button in Inquiry, Phone Op, or the Verify Member screen*

5. On the Current Month Activity Compare screen, you will then be able to view a summary of the transaction activity for the member you selected and the cost of those transactions to your credit union. Keep in mind that
the transaction activity you will be able to view will be for all transaction types (Origins) you had configured when setting up your group.

This screen is helpful in seeing the big picture of a member’s activity in order to determine if that activity is truly “abnormal” for the member. For example, if the member’s activity falls into the abnormal range, but you find in this screen that the member, for the past four months, has consistently conducted about that same number of transactions, then you may decide that, for this particular member, the activity is perfectly normal.

Keep in mind that since some members conduct most of their transactions at the beginning or end of the month, you may not get a clear picture of what is “normal” for the member by just viewing the first column, Current Totals. It’s therefore wise to also analyze the other columns as well.

The Activity branch field displays the number of the branch where the member conducts the most transactions and the percentage of total transactions conducted at that branch.

The Most used branch field displays the number of the branch the member visits the most and the percentage of total transactions conducted at that branch.

The default view shows you the current month’s totals as well as totals for the prior three months, but you can also see Daily Averages by clicking Daily Averages (F4).

The top of this screen shows the activity for the selected member. The bottom shows the costs associated with those transaction types (Origins) that you configured via Tool #246 Configure Delivery Channels/Costs.

To understand the difference between the “activity” and “most used” branch, take a look at the following example. If the member conducts ten transactions every Friday at branch 1, but conducts 1 transaction every day at branch 2, then branch 1 would be the “activity branch” and branch 2 would be the “most used branch.”

6. To analyze how many transactions are “typical” on a daily basis, use Daily Averages (F4).
7. To compare the member’s three-month average totals to the three-month average totals of all members, click *Compare All Mbrs* (F5).

The last column shows how the member’s activity compares to that of all members for three-month average totals.