
The Financial Institution Data Match (FIDM) Act:

Compliance for CU*BASE Credit Unions

INTRODUCTION

What is the Financial Institution Data Match Act?

It is related to the Federal Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (the “Welfare Reform Act”), which provides a strengthened child support enforcement program. The FIDM is the provision that requires all States to perform a quarterly data match with financial institutions, to identify accounts belonging to parents who are delinquent in their child support obligation. When a match is identified, State child support agencies may take action on those accounts to collect past-due child support.

For more information on the history and provisions of this Act, visit the Office of Child Support Enforcement’s web site at www.acf.hhs.gov/programs/cse/fct/fidm/.

Revision date: August 24, 2020

For an updated copy of this booklet, check out the Reference Materials page of our website:
http://www.cuanswers.com/client_reference.php
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FREQUENTLY ASKED QUESTIONS

Does each State have the same procedure?

Although this is a Federal regulation, each State is responsible for administering the matching of records, and therefore the specific procedures required will vary from one State to another. You will be contacted by the appropriate State agency with all of the applicable rules and regulations for your credit union, including file exchanges ~~media (tape, diskette, etc.)~~ and timing.

So far we have seen information from only a few States for CU*BASE clients, and each has required the signing of some sort of “Data Exchange Election Form” or other agreement that specifies how, when, and where the exchange of data will occur, once each calendar quarter.

NOTE TO MULTIPLE-STATE AND “BORDER” COMMUNITY CREDIT UNIONS: Because regulations can vary from State to State, we recommend that you sign a separate agreement with each state in which you do business.

How will credit union data be matched against State records?

The Act provides for two different “match” methods: The “All Accounts” method, where your credit union would send a list of all memberships to the State, who would then use the file to match against their records; or the “Matched Accounts” method, where the State provides a complete list of all delinquent non-custodial parents and the credit union must return a list of any memberships that match the State’s list.

In the interests of protecting the confidentiality of your member data, CU*Answers uses the “Matched Accounts” method, where data received from your State is compared to your CU*BASE database, and a list of **matching** records is compiled and returned to the State for compliance to the Act. If you or your state require the ‘All Accounts’ method, please contact CU*Answers.

What actually happens each quarter?

‘Matched Accounts’ method:

In a nutshell, your State agency sends a file once each quarter. This file is received by an iSeries process and a routine runs that compares the file to your CU*BASE files using Social Security/Tax Identification numbers. Both primary member and joint owner names (whether members or non-members) are checked.

The process creates a separate file with all records that match, along with a report showing the contents of the file. After the report is reviewed by the credit union, the new, smaller file is returned to the State agency. The matched file must be submitted within 30-45 days of receiving the original file from the State. Member/joint owner records are not altered and there is no requirement in the Act to take any action on your accounts as a result of the matching process.

‘All Accounts’ method:

A file is created that contains both primary member and joint owner names (whether members or non-members) of all your accounts, along with a report showing the contents of the file. The file is submitted to the State agency.

What will this process cost?

For **online credit unions**, where CU*Answers will receive the file, perform the match and return the completed file to the State for you, a fee will be charged for each file processed (each quarter).

For **self-processing credit unions**, there will be one-time start-up fee for the match program, and a maintenance fee. This covers the costs of modifying the program to match new State specifications, or any other upgrades needed to be compatible with CU*BASE files.

Testing, if required by your State, will be conducted at no additional charge to the credit union. As a test is completed for each State, we will keep complete records of test results and will make them available in lieu of a test if allowed by your State agency.

Other Important Considerations

The information CU*Answers received specified that the data format to be used in reporting matched records was standardized as the IRS Form 1099 format that existed as of 1998. It will be the credit union’s responsibility to notify CU*Answers if and when new State specifications or requirements are implemented, so that programming updates can be scheduled.

For the ‘Matched Accounts’ method, files will be run against CU*BASE member data **as of the day the file is processed**. In other words, this process looks at live data, not end-of-month files, for the most up-to-date information.

I’ve already received information from my State agency.

What should I do now?

First, contact a Client Service Representative. We may request a copy of the paperwork provided to you by the State, and will discuss any particulars for your credit union. We will assist you in completing any agreement between you and your State agency, and set up any needed data exchange tests.

Once the agreement has been completed, be sure to send a copy of the final document to CU*Answers, attention Client Services, for our files.

What are some hints for completing my state’s Data Exchange Agreement?

Following are some hints for completing your state’s Data Exchange Agreement.

- **Data transfer** – FIDM files are received and sent via manual download/upload or via secure FTP transmission. The options available will depend on your State agency.

For **online credit unions**, we will assist you in choosing the data transfer process. For **self-processing credit unions**, see the section on data

transfer options later in this booklet. Contact CU*Answers for information about using a secure FTP transmission method.

- **Election Week** - You may be asked to specify a starting calendar quarter, as well as the week within each quarter when the data will be forwarded from the State. For **online credit unions**, CU*Answers will assist you in determining appropriate timing. For **self-processing credit unions**, while you may specify any timing that is convenient for you, keep in mind that the beginning quarter you choose must allow adequate time for any required testing, etc. Contact CU*Answers for assistance.
- **Vendor Information** - For **online credit unions**, fill in CU*Answers' name and address as follows and request that data be transmitted directly to CU*Answers as your authorized vendor:

CU*Answers
6000 28th Street SE
Grand Rapids, MI 49546
Contact: Operations, 616-285-5711, ext. 132

Self-processing credit unions should leave all vendor information blank, so that the exchange takes place directly between your credit union and the State.

PROCEDURES FOR ONLINE CREDIT UNIONS

If you have made arrangements with CU*Answers regarding handling your credit union's quarterly data match, the file will be processed within 5 business days after it is received at CU*Answers from your State agency.

After the new file has been created showing all of the matched records, the "Financial Institution Data Match (FIDM) Statement of Matched Records" report will be sent to your credit union's Data Processing Coordinator for verification:

SSN#	NAME	BIRTHDAY	ACCT	BASE	TYPE	BALANCE
999449773	DOE JOHN	1960/09/05	21729	000	56	
				320	1,029	
999459937	SMITH EDWARD	1974/12/24	21436	000	53	
999468531	JONES KATHY	1972/06/15	22841	000	5	
				110	3,250	
999473829	JOHNSON MATTHEW	1973/11/13	24179	000	48	
				111	136	
999838291	BROWN JOHN	1957/07/11	2301	000	960	
				110	2,923	
				115	19,316	
			18892	000	102	
188 ACCOUNTS REPORTED						143,341 **

Included will be all accounts where the SSN/TIN matches the state's list. Records are shown from your CU*BASE MEMBER1 (share), MEMBER2 (share draft), MEMBER3 (certificate), and MEMBER4 (tax/escrow) files only, not loans. The name shown is the one that was found to be a match, whether the primary account holder or a joint owner.

For the 'All Accounts' method, the report will contain the same data elements but will list all accounts.

UNDERSTANDING PRIMARY MEMBER VS. JOINT OWNER MATCHES

The match process will actually look at all primary member and joint owner names and SSN/TINs.

If the primary member is a match, the file that is produced for use by your State agency will actually include a separate record for every joint owner on that member's accounts. However, to keep the report size manageable, the verification report will only show the account once, even if there were multiple joint owners reported.

For example, say member John Smith was a match, and John has three joint owners between his savings and checking accounts. Three records would be produced for the file, each with the John Smith as the "primary name" and a separate person listed as the "secondary name." However, the report will just show John Smith and his sub-accounts once.

If a joint owner is a match, the file and report will contain a single record with the joint owner's name as the "primary name" and the actual member's name as the "secondary name" in the file.

For example, say member Mary Jones has a joint owner, Dave Jones, and Dave is found as a match. The file would contain a single record showing Dave Jones as the “primary name” and Mary as the “secondary name.” The report would show Dave’s name and SSN but would list Mary’s account number(s).

PROCEDURES FOR SELF-PROCESSING CREDIT UNIONS



*These procedures should be followed only after you have contacted CU*Answers to go over the initial setup process and receive access to the FIDM processing software. The following steps assume you will be receiving and transmitting data via secure FTP.*

NOTE: If using 'All Accounts' method, then you can go directly to Create and Send FIDM file.

UPLOADING THE FIDM FILE FROM YOUR STATE AGENCY

There are 3 ways to get the FIDM file from your state agency uploaded into CU*BASE – 1) Manually via Tool # 1375 Data Transfers, 2) Let MNOP03 # 6 Receive FIDM File run the data transfer OR 3) Place downloaded FIDM state file on the iSeries IFS.

One-Time Setup Procedure

These steps set up your PC with the appropriate folders and configuration files you will need to send and receive FIDM files. This procedure needs to be done just once on each PC that will be used for FIDM processing.

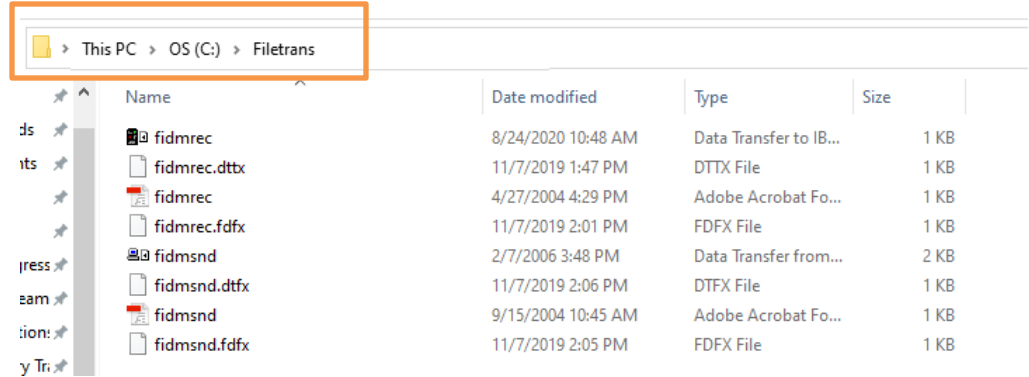
If you choose option 3) Place downloaded FIDM state file on the iSeries IFS:

1. With Windows Explorer, browse to the mapped drive that represents the iSeries IFS. Create the folder FIDM. Within that folder create the subfolder for your state – i.e. FIDM/MI

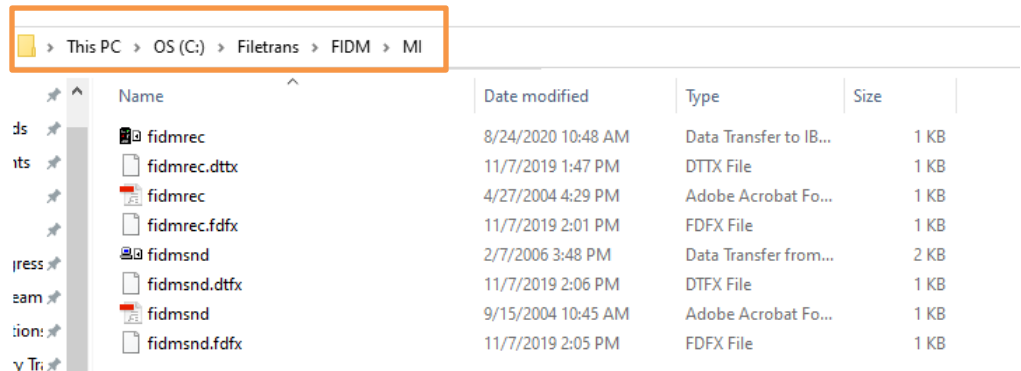
If you choose option 1 or option 2 (Data Transfer Methods):

1. Go to <https://www.cuanswers.com/resources/doc/cubase-reference> and click on FIDM Configuration Files for Self Processors to download the zip file containing the Client Access transfer files. The zip file FIDM_configyyy will download to your C:/Downloads folder.
2. Use Windows Explorer and browse to your C:/Downloads folder. Double-click on the FIDM_configyyy.zip file to open the file. Click on the Unzip icon.

- Click the Unzip box and the files will be loaded into the C:/filetrans folder.

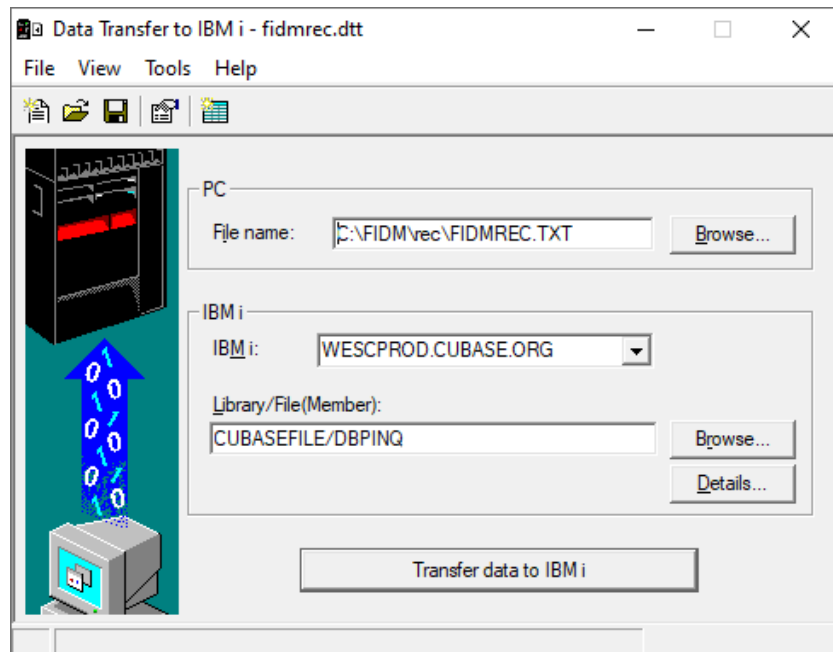


- In Windows Explorer, double-click on the **fidmrec.dttx** file. This will open the Client Access file transfer dialog box. Go to the box labeled *System* and use the drop-down arrow to select the correct name for your iSeries system. Save the transfer and then close it.
- Double-click on the **fidmsnd.dttx** file. Use the drop-down arrow next to *System* to select the correct name for your iSeries system. Save the transfer and then close it.
- If you are using option 1 - Manually via **Tool # 1375 Data Transfers**, you are done with the one-time set up.
- If you are using option 2 - Let MNOP03 # 6 Receive FIDM File run the data transfer, you will need to use Windows Explorer to:
 - Within the Filetrans folder, build subfolder FIDM.
C:/Filetrans/FIDM
 - Within subfolder /FIDM, build subfolder /xx, where 'xx' is the state abbreviation
C:/Filetrans/FIDM/MI
 - Move all downloaded files to the state subfolder



Processing FIDM File into CU*BASE

1. Access your state's web site and download the FIDM file as instructed on the website.
 - a. If using option 1 or option 2, using the following location and file name: **C:\Filetrans\FIDM\xx\FIDMREC.TXT**
 - b. If using Option 3 - Place downloaded FIDM state file in the /FIDM/xx subfolder on the drive that is mapped to your iSeries IFS.
2. If using option 1, follow steps a-b. Otherwise go to step 3.
 - a. In Windows Explorer, double-click on the following file to launch the Data Transfer dialog box:
C:\FIDM\Rec\fidmrec.dttx



- b. Click **Transfer data to iSeries** to transfer the data from the FIDM list (FIDMREC.TXT) to your iSeries (file DBPINQ in CUBASEFILE). Once the transfer is complete, proceed to next step.

3. From the MNOP03 “Monthly Processing” menu (OPER #3), choose “Receive FIDM File.”

Session 0 - Create FIDM Inquiry File - 11:03:32

Report Options	Response
Receive data from	<input checked="" type="radio"/> Client Access <input type="radio"/> Existing file <input type="radio"/> I drive
State	<input type="text"/>

CU*BASE operator edition

Exit Proceed Now

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4. In the *Receive data from* field, the values correspond to how the FIDM state file is uploaded.
 - a. Enter **E** for Existing file if you manually ran the data transfer via Tool #1375.
 - b. Enter **I** for I Drive if you placed the state file on the iSeries IFS folder.
 - c. Enter **C** for Client Access if you want this option to run the data transfer.
5. In the *State* field, enter the 2-character state id you are processing for and press Enter.
6. This step will create the DBPINQxx (where xx = state id) file in OPERATOR.

Create and Send FIDM file

1. In CU*BASE, from the MNOP03 “Monthly Processing” menu (OPER #3), choose Create & Send FIDM File.

Self processors should leave this unchecked. This is used by CU*Answers for online clients only. (An additional screen appears for us to enter data processing vendor information.)

Self processors should leave this field blank unless they are reporting to multiple vendors for a given state (used by Data Centers).

This is used by Data Centers only.

- a. In the *Transmit via* field, the values correspond to how the FIDM report file is downloaded from CU*BASE.
 - Enter **I** for IFS if using the iSeries IFS
 - Enter **C** for Client Access if data transfers are on your C: drive
 - Enter **O** for Other if you are manually running the data transfer download.
 - Only use **F** for FTP if CU*Answers has set up a secure FTP transmission for your credit union.
 - b. In the *Reporting Method* field, enter 1 for All Accounts or 2 for Matched Accounts.
 - c. In the *State* field, enter the 2-character state id you are processing for.
 - d. Leave the *Vendor sequence #* field blank.
2. This step will create the DBPRPTxx01 file (where xx = state id) in CUBASEFILE. If All Accounts Method selected, DBPRPTxx01 file will contain all accounts. If Matched Accounts Method selected, this step will compare the FIDM list to your member files and the DBPRPTxx01 file will contain only the records that match between the State’s file and your CU*BASE member records.

The following report will be automatically created to show the contents of the new file:

SSN#	NAME	BIRTHDAY	ACCT	BASE	TYPE	BALANCE
999449773	DOE JOHN	1960/09/05	21729	000	56	
				320	1,029	
999459937	SMITH EDWARD	1974/12/24	21436	000	53	
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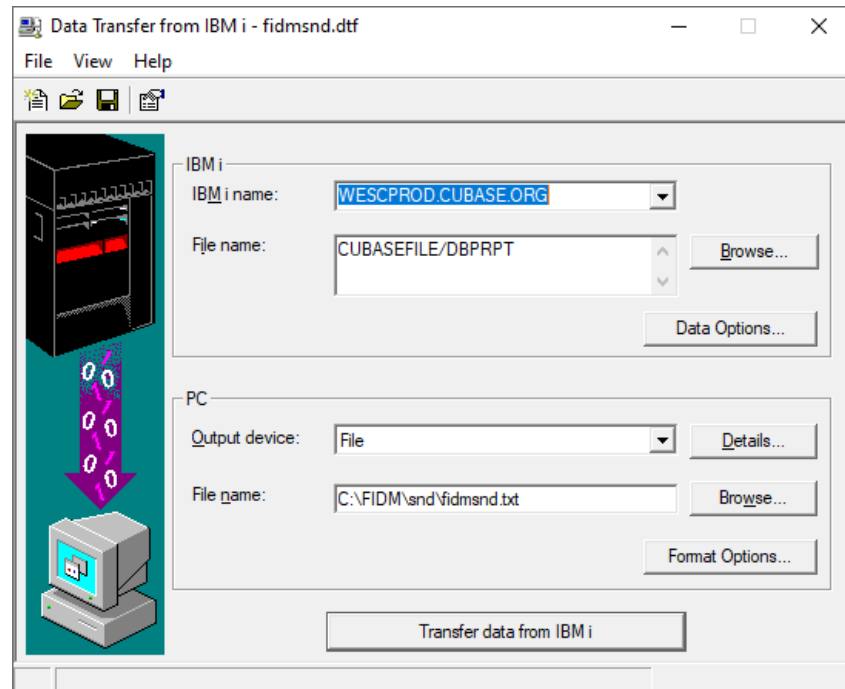
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RETURNING THE FILE

When the process is complete and the report has been verified, use the following procedure to send/return the file to the State.

NOTE: If you are not manually downloading the file from CU*BASE, you can go directly to step 3.

1. Back in Windows Explorer, double-click on the following file to launch the Data Transfer dialog box: **C:\Filetrans\FIDM\fidmsnd.dttx**



2. Click **Transfer data from iSeries** to begin transferring the data from the DBPRPTxx01 file to a text file on your PC (fidmsnd.txt) so that it can be sent back to the state.
3. Access your state's web site again and upload the following file, according to the instructions on the website:
C:\Filetrans\FIDM\xx\fidmsnd.txt, where x = state id. If you manually downloaded the file, the file is in the \ FIDM subfolder.

AUDIT TRACKER

When FIDM Monitoring is run and a match is found, the member, receives a conversation appended to his or her AT Tracker with the Memo Type F1. The message on this conversation reads, “Member or Joint Owner matched record on FIDM report on mm/dd/yyyy for account base 00000000.”

REVIEWING A TRACKER AT A LATER DATE

1. Later if you want to review a member’s account you simply review his or her Audit Tracker. You can access member trackers through Inquiry or Phone Inquiry. Select the member’s base account and use *Tracker Review* (F21) to view the Member Tracker Review.

Member Inquiry - Use “Tracker Review” (F21)

Session 0 CU*BASE GOLD Edition - ABC TESTING CREDIT UNION

File Edit Tools Help

Member Account Inquiry

MSR Account # **MARY MEMBER** Date opened **Nov 23, 1982**

G/L account **901.00-01**

Account type **000 REGULAR SAVINGS**

Div appl **SH REGULAR SAVINGS**

Outstanding accrued club benefits **0.00**

Current balance	32.25	Annual b/u withholding	0.00
- par value	5.00	Period average balance	26.02
- secured	0.00	Period minimum balance	379.15-
- uncollected	0.00		
= Net available	27.25	YTD club benefits	0.00
1st date negative	00000000		

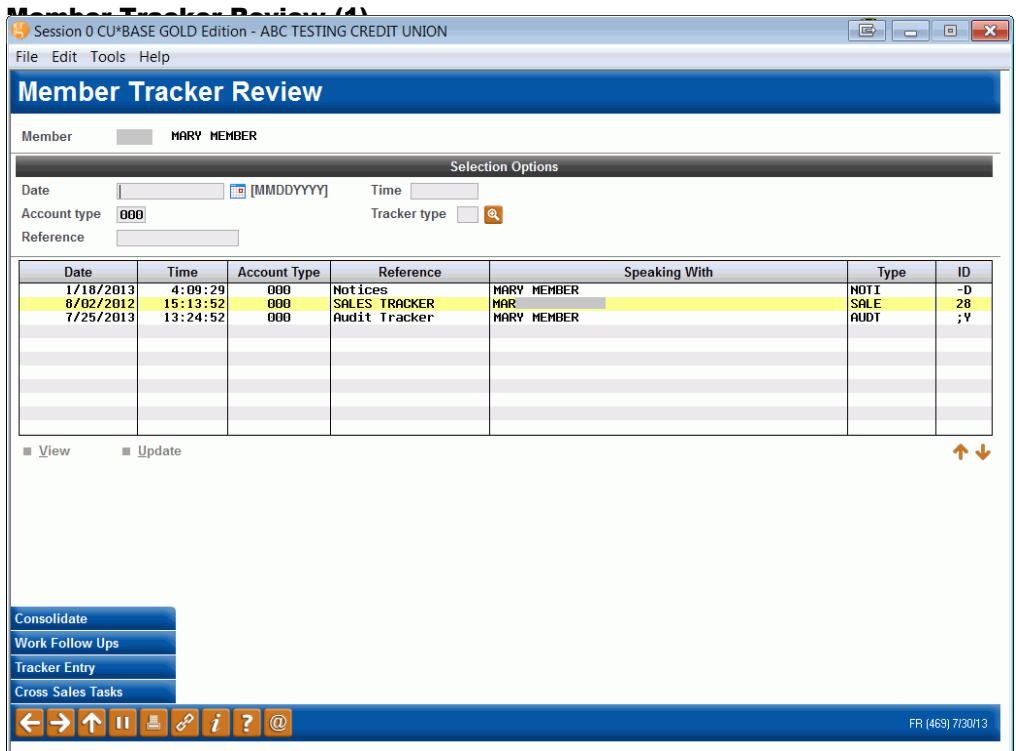
Dividend Information

Quarter	Amount	Total
Quarter 1	0.00	0.00
2	0.00	Accrued 0.00
3	0.00	
4	0.00	

Transaction inquiry date [MMDDYY]

FR (3758) 7/30/13

2. Here you will view a list of the member’s Trackers (they might have a Collections (XX) or Sales (ST) Trackers as well) and you will see the Audit Tracker in the list. Select to view this Tracker to view the Audit Tracker Conversations.



- Once you select to view the Audit Tracker, you will see a conversation about the activity on the account. Here we see a record of the FIDM scan.

Member Tracker Review (2)

