



Running a FinCEN 314(a) Scan

Against Your CBX Database

INSIDE THIS GUIDE:

Procedures and other helpful information that will help you run a FinCEN 314(a) Scan against your CBX Database.

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Introduction

Auditors will love the time they are saved by using the on-demand manual FinCEN scan, built directly into CBX. By using **Tool #769 Run FinCEN 314(a) Scan**, auditors can quickly run the credit union membership against the files downloaded from the FinCEN website. The scan will review open (MASTER) and closed (MSHIST) membership files, as well as non-member (MSNONMBR) files, and provides a printed report for reporting on the FinCEN website. This printed report will only list records where several key fields match the FinCEN file. If a match is made, the report will also list all other fields for this record, and whether these fields resulted in a match (or not). Asterisks will appear next to non-matching fields, further assisting the auditor in recognizing false positives.

Interested in using this feature? Contact a Client Services Representative to request upload privileges for your auditor. This individual will use the existing upload process available to upload the FinCEN files to the iSeries.

The CU*Answers Client Services team is here to assist at any time. Find us, contact us, and learn more via [The Store](#) | [The Website](#) | [Email](#)

Requesting Access

Special authority is required to upload files from a PC onto the CBX system. Start by completing the *iShield Security Access Request for CBX Uploads* form, available at the URL shown below, to request access privileges (select the “FCPERSON & FCBUSINESS” tables):

https://www.cuanswers.com/wp-content/uploads/iShieldRequestForm_Upload.pdf

Procedures for Preparing Files

Use the following steps to retrieve the FinCEN list from the FinCEN website and prepare your data files for scanning.

Download Files from the FinCEN Website

1. Access the FinCEN website (<https://www.fincen.gov/314a>) and download the .CSV version of the FINCEN PERSON file as instructed on the website. Save it to the following location with the title name: **C:\FINCEN\FCPERSON.CSV**.
 - **IMPORTANT:** It is critical that the files are saved in the exact manner outlined in this step. Only download one file at a time.
2. Then use the same website and directions to download the .CSV version of the FINCEN BUSINESS file and save it to the following location with file name: **C:\FINCEN\FCBUSINESS.CSV**.
 - **IMPORTANT:** It is critical that the files are saved in the exact manner outlined in this step. Only download one file at a time.
3. Prepare each file (FCPERSON and FCBUSINESS) for upload by using the following directions. Follow these directions to prepare each file separately.
 - Open Excel and browse to your saved file (the .CSV you have saved to your C:\ drive).
 - Delete the Header Row (non-data material, generally the first row) of each file.
 - Re-save the file as a .CSV (not .XLS) to the original location. Be sure to resave your file at the location listed above. (You will replace the original version you saved in Step 1 or Step 2.)
 - **NOTE:** If you do not follow the directions in Step 3, you will receive an error message when you attempt to upload the files to the iSeries. If you get this error message, select *Cancel*. Then follow Step 3 before attempting to upload the file.

Preparation: First Time at Credit Union Only

IMPORTANT: Before you upload the FCPERSON and FCBUSINESS files **for the first time at your credit union**, you must first create the files in your QUERYxx library.

1. Launch **Tool #769 Run FinCEN 314(a) Scan**.
2. Use F7 to cancel.

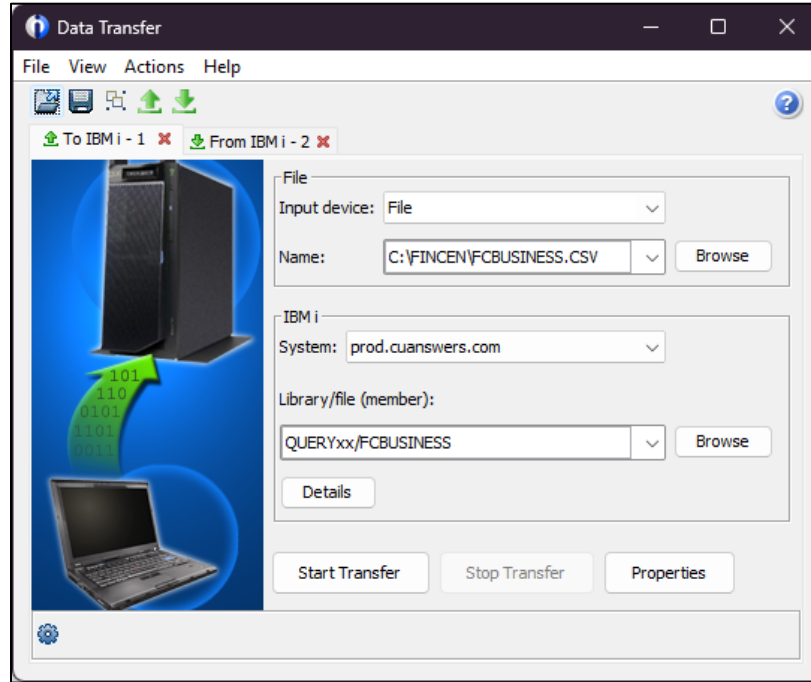
Upload Files to iSeries

Once you have saved the files to your C:\ drive, you may upload them to the iSeries.

NOTE: Once the FinCEN scan is run, the FCPERSON and FCBUSINESS files on the iSeries will be cleared. The files on your local C:\ drive will not be cleared, however. If you need to run the scan a second time, follow the following directions to upload the files a second time. (Both FCBUSINESS and FCPERSON will need to be uploaded.)

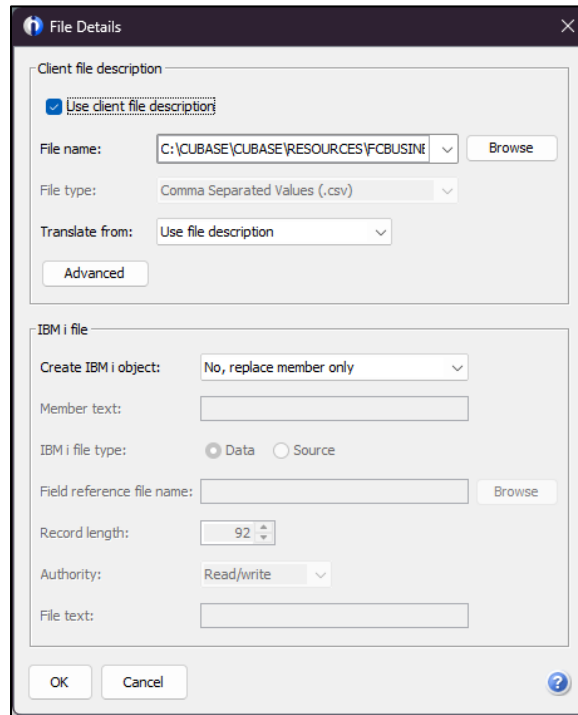
1. Launch **Tool #1375 File Transfers (Upload or Download)**.
2. First upload the *FCBUSINESS* file to the iSeries. See the table below the following screenshot for tips on filling out each field.

Tool #1375 File Transfers (Upload or Download)

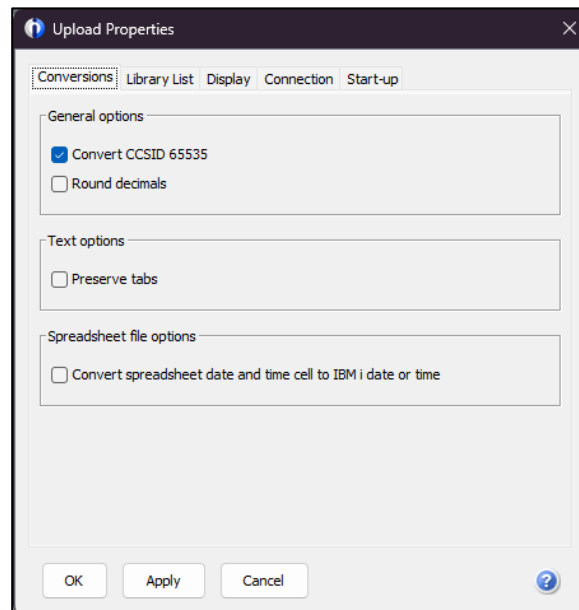


Field Name	Description
Input Device	These settings refer to where the data is going. You will select “File” when uploading a file to the iSeries.
File Name	<p>Enter the path (the storage location, both drive and folder) and file name where the downloaded file should be stored on your PC. Use backslashes between the folder name and the file name, as in the sample above.</p> <ul style="list-style-type: none"> • HINT: Locating files to upload and keeping your computer storage clean will be much easier if you designate a special folder for these files.
IBM i – These settings refer to where the data is going.	
System	<p>This designates the iSeries system from which the files will be uploaded.</p> <ul style="list-style-type: none"> • Online Clients: PROD.CUANSWERS.COM • Site-Four Clients: PROD.SITE-FOUR.COM
Library/File (Member)	<p>Enter your credit union’s Query library name, a forward slash, then the name of the file definition that has been specifically created for the G/L Upload</p> <ul style="list-style-type: none"> • QUERYxx/FCBUSINESS <p><i>(For the xx, fill in your credit union’s two-character credit union ID)</i></p>

- Click the **Details** button.
- Enter **C:\CUBASE\CUBASE\RESOURCES\FCBUSINE.FDFX** in the screen as shown below (casing doesn't matter), then click OK.



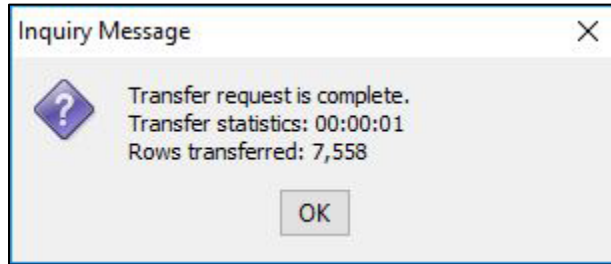
- After returning to the data transfer window, select **Properties**.



- Under the Conversions tab, check *Convert CCSID 65535* as shown above and click **OK**.
- To begin the transfer process, click the **Start Transfer** button. A series of messages will appear to report on the progress of the transfer.

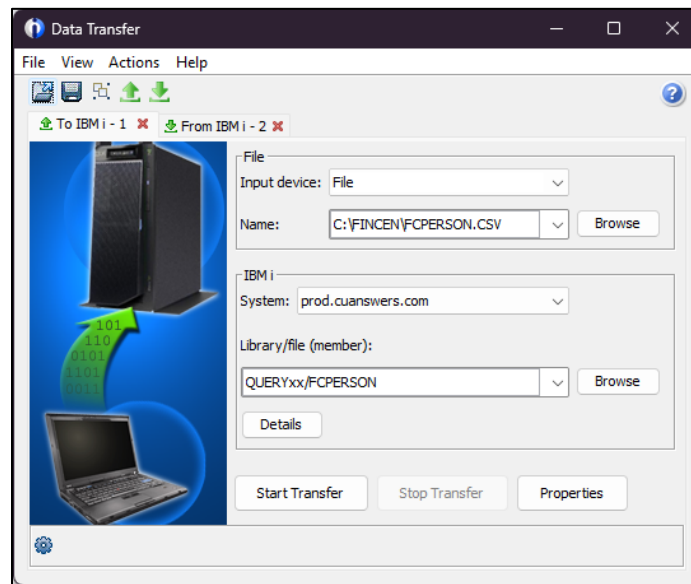
If you experience problems uploading, it may be because you have not been authorized to upload the data. If you see the error: “Data in this field is incorrect or does not match the PC data type”, make sure to set the properties as shown above.

8. When the transfer is complete, the following message will appear. Click **OK** and the Data Transfer dialog box will reappear.



The number of “Rows transferred” should match the number of individual figures in your original source file.

9. The file is now uploaded to the FCBUSINESS file definition.
10. Next upload the *FCPERSON* file to the iSeries. Fill in the screen exactly as shown below, substituting your system name and CUID.

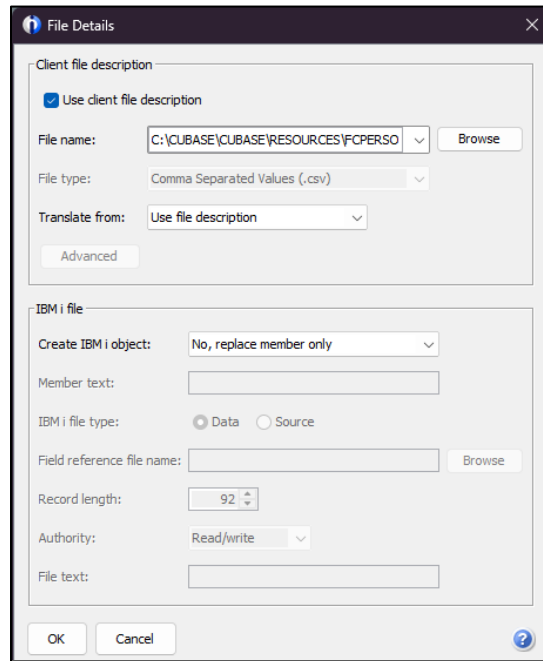


Field Name	Description
Input Device	These settings refer to where the data is going. You will select “File” when uploading a file to the iSeries.
File Name	Enter the path (the storage location, both drive and folder) and file name where the downloaded file should be stored on your PC. Use backslashes between the folder name and the file name, as in the sample above.
IBM i - These settings refer to where the data is going.	
System	This designates the iSeries system from which the files will be uploaded. <ul style="list-style-type: none"> • Online Clients: PROD.CUANSWERS.COM • Site-Four Clients: PROD.SITE-FOUR.COM
Library/File (Member)	Enter your credit union’s Query library name, a forward slash, then the name of the file definition that has been specifically created for the G/L Upload.

Field Name	Description
	<ul style="list-style-type: none"> QUERYxx/FCBUSINESS (For the xx, fill in your credit union's two-character credit union ID)

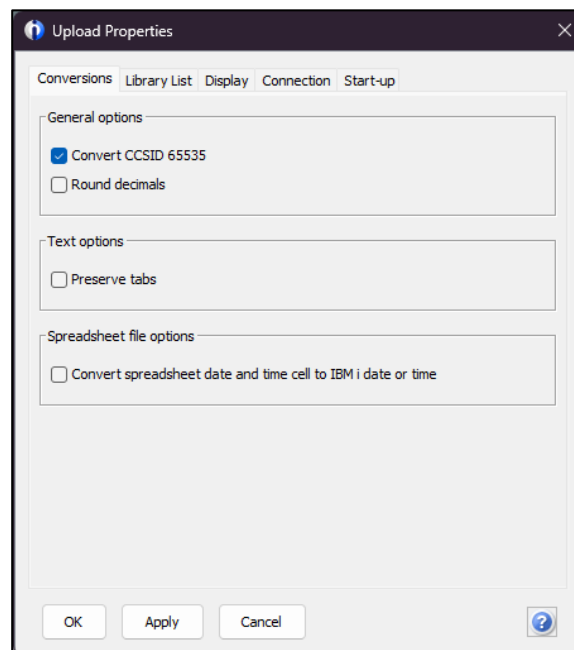
11. Click the **Details** button.

12. Enter `C:\CUBASE\CUBASE\RESOURCES\FCPERSON.FDFX` in the screen as shown below (casing does not matter):



13. Click **OK** to save and return to the Data Transfer window.

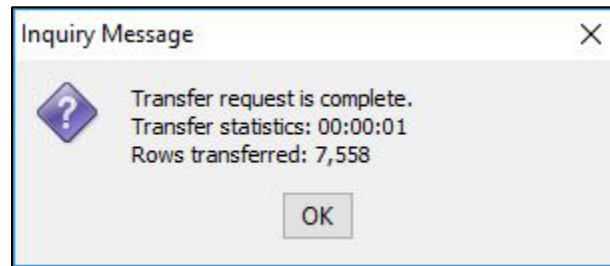
14. After returning to the data transfer window, select **Properties**.



15. Check *Convert CCSID 65535* as shown above and click **OK**.
16. To begin the transfer process, click **Start Transfer**. A series of messages will appear to report on the progress of the transfer.

If you experience problems uploading, it may be because you have not been authorized to upload the data. If you see the error: “Data in this field is incorrect or does not match the PC data type”, make sure to set the properties as shown above.

17. When the transfer is complete, the following message will appear. Click **OK** and the Data Transfer dialog box will appear.



The number of “Rows transferred” should match the number of individual figures in your original source file.

18. The file is now uploaded to the FCPERSON file definition.

Running the Scan

To run the scan, use the screen below and select **Run/Scan**. This will generate the report.

IMPORTANT: Once the scan is run, the FCPERSON and FCBUSINESS files on the iSeries will be cleared. If you wish to run the scan a second time to produce another report, you will need to upload the files again to the iSeries.

Tool #769 Run FinCEN 314(a) Scan

The dates on this screen are the dates the files were uploaded to the iSeries.

How the Scan Works

The file scans individuals with matches to the FCPERSON file, looking for matches to the MASTER (current members), MSNONMBR (current non-members), and MSHIST (closed members).

- The scan reviews MSHIST data for 12 months.

The scan looks for positive matches with FCPERSON for the following three required fields:

- FIRSTNAME
- LASTNAME
- BIRTHDATE

(Matches to Alias First Name, Alias Last Name and Birthdate will also appear in this section.)

The scan also looks for organization matches to the FCBUSINESS file. The scan looks for positive matches to the following required fields:

- BUSINESS NAME

(CBX compares against Last Name, First Name and Middle Initial data for this match. Dates are not matches to this file, since they can be variable.)

When the scan finds an individual or organization with matches to *all* the required fields, the scan then also continues to scan the following fields to determine whether the data in these fields result in a match.

FCPERSON – Individuals

- Middle Initial
- SSN
- Address 1
- City
- State
- Zip + Zip 4
- Country (If the foreign address field in CBX is checked, the scan analyzes the country name (which is stored in the city field) against the FinCEN file. If the foreign address field is not checked, the scan checks to ensure the FinCEN country name is US or USA.)

FCBUSINESS – Organizations

- TIN
- Charter Date
- Address 1
- City
- State
- Zip – Zip 4
- Phone
- Country (If the foreign address field in CBX is checked, the scan analyzes the country name (which is stored in the city field) against the FinCEN file. If the foreign address field is not checked, the scan checks to ensure the FinCEN country name is US or USA.)

What Results Show on the FinCEN Report

The report first lists the FCPERSON scan matches; these results are further broken down by file – MASTER, MSNONMBR, and MSHIST. Next the matches to FCBUSINESS are listed. Individuals and organizations that appear on the report matched all required fields, and these matches appear as separate lines on the report.

The report assists auditor with determining if any of these “suspect” individuals or organizations are false positives by listing the results of all other scanned fields. Each additional field is listed on a separate line of the report. (Fields not containing data – blank fields are not shown on the report.) **An asterisk next to a field indicates that there was *not a match*.**

- For example, if John Smith appears in the report, he is suspected since his first name, last name and birth date resulted in a match. However, if all the other fields on the report include asterisks (indicating no match), it is more likely that he is a false positive.

Report Sample

Below is an example of the file that is created by the scan. The “business” matches follow the “person” matches.

1/03/9999	11:09.32	ABC CREDIT UNION	UFINCENS	PAGE
RUN ON	1/04/9999	FINCEN 314(a) SCAN		USER
PERSON LIST - DOWNLOADED 1/04/12		PERSON RECORDS SCANNED = 103		
***** CU MASTER FILES *****				
ACCT BASE	MEMBER NAME	FILENAME	FIELD	FIELD MATCHED
11	WILLIAM T. MEMBER JR	MASTER	LNAME	LAST_NAME
		MASTER	FNAME	FIRST_NAME
		MASTER	MIDIN	MIDDLE_NAME
		MASTER	BDATE	DOB
***** FINCEN FILE *****				
				TRACKING #
				111111
				111111
				111111
				111111
***** CU NONMBR FILES *****				
12	ANNE J. NONMEMBER	MSNONMBR	LNAME	LAST_NAME
		MSNONMBR	FNAME	FIRST_NAME
		MSNONMBR	BDATE	DOB
***** FINCEN FILE *****				
				444444
				444444
				444444
***** CU NONMBR FILES *****				
51	JOHN A. OLDMEMBER	MSHIST	BDATE	DOB
		MSHIST	LNAME	LAST_NAME
		MSHIST	LNAME	LAST_NAME
		MSHIST	FNAME	ALIAS_FIRST_NAME
		MSHIST	LNAME	ALIAS_LAST_NAME
		MSHIST	SSN	*NUMBER
				777777
				777777
				777777
				777777
				777777
				777777
**	1	= Active account matches		
**	1	= Closed account matches		
**	1	= Non-Member matches		
BUSINESS LIST - DOWNLOADED 1/04/12		BUSINESS RECORDS SCANNED = 29		
***** CU MASTER FILES *****				
ACCT BASE	MEMBER NAME	FILENAME	FIELD	FIELD MATCHED
192	ABCD CHOICE UNITED	MASTER	NAME	BUSINESS_NAME
		MASTER	ADDR1	*STREET
		MASTER	CITY	*CITY
		MASTER	STATE	*STATE
		MASTER	US/USA	COUNTRY
***** FINCEN FILE *****				
				122222
				122222
				122222
				122222
				122222
**	1	= Active account matches		
**	0	= Closed account matches		
**	0	= Non-Member matches		