Using the CU*BASE Data Match System for OFAC Compliance

INTRODUCTION

This booklet describes using the new CU*BASE Data Match system to match your membership records against the current "Specially Designated Nationals & Blocked Persons" (SDN) list and Consolidated Sanctions list (non-SDN lists including PLC, FSE, Part 561, ISA, and SSI) published by the Office of Foreign Asset Control (OFAC), including monthly processing fees for online credit unions.

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For an updated copy of this booklet, check out the Reference Materials page of our website: http://www.cuanswers.com/resources/doc/cubase-reference

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OVERVIEW

WHEN IS AN OFAC SCAN RUN?

An OFAC Scan is run at various times and as a result of various actions.

- Every weekend CU*Answers Operations will automatically run the OFAC scan on your entire membership. The reports showing suspect hits will be placed in your DAILYxx output queue. The default OUTQ routing will be set to both print and archive. If you do not want to print this, use **Tool #573** *OUTQ Report Control* to change your routing settings for the LOFAC report. (If there were no SDN/Consolidated Sanctions list changes during a particular week, no report will be produced for that weekend.) See Page 5. (NOTE: Self Processors can run this scan on demand. See Page 4.
- If configured in Workstation controls, an OFAC scan is run each time a new membership or non-member record is created, even when the non-member information is entered during pre-member lending. **See Page 8.**
- Every time an Account-to-Account (A2A) relationship is set up (relationship with other FI), when an outgoing wire, corporate check or money order is created (including loan disbursements), or when a Certificate is redeemed via check, an OFAC scan is automatically run. (NOTE: Wires to international addresses are not run through an OFAC scan.) **See Page 14.**
- A manual OFAC scan can be run on any item at any time using the stand alone OFAC scan. **See Page 15.**
- When a loan application comes into the loan queue from an indirect third-party loan queue, certain items are run through OFAC. See page 14.

After the report is printed, evaluate each reported match carefully, noting any "false positives." For any valid matches, follow OFAC guidelines available at <u>http://www.treasury.gov/about/organizational-</u><u>structure/offices/Pages/Office-of-Foreign-Assets-Control.aspx</u> to report them according to current regulations.

MONTHLY FEE FOR THE DATA MATCH SERVICE (ONLINE CUS)

Online credit unions that activate the OFAC scan (see Page 8) will be charged a monthly processing fee of **\$10.00 per month**, which includes daily handling of the OFAC files and ongoing maintenance of the scanning software. The fee will be added to your normal monthly invoice starting after activation.

Fees subject to change. Refer to the most recent Pricing Schedule for current pricing.

PULLING YOUR OWN COPY OF THE OFAC REPORT

In order to evaluate the matches found on the CU*BASE report, it may be helpful to view a copy of the lists that were used for the comparison. These can be found on the US Treasury Dept. website as follows:

SDN List:

http://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx

Consolidated Sanctions List:

http://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/consolidated.aspx

SPECIAL NOTE FOR SELF PROCESSING CREDIT UNIONS

If you wish to use the OFAC system against your own member records you will need to download the files from the OFAC web site. There will be no fee for this service since you will be downloading the file yourselves. Self Processors can continue to run a batch scan on their membership.

Downloading the OFAC File

Refer to the separate document, "Downloading OFAC File Lists for the CU*BASE Data Match System" for complete instructions on downloading the current OFAC lists from the web site onto your iSeries system for use by the data match feature. Repeat the procedure every time you wish to refresh the OFAC files. This can be done using any schedule you wish (typically once a month), according to your internal policies and examiner requirements.

Self Processor Running Batch Scan On Demand

The only access to run the batch scan is from OPER Tool #5410 Run OFAC Data Match (Batch Scan). Self Processors need to assign someone at their credit union, either on their Ops team or someone who can be granted access to this command, to run the scan regularly.

For online credit unions, this scan will be run according to the schedule documented on Page 3.

RUNNING THE DATA MATCH REPORT

WHAT IS MATCHED DURING THE BATCH SCAN?

When the comparison report is generated, your credit union's MASTER (current members), and MSNONMBR (non-members) files are compared to the SDN and Consolidated Sanctions lists downloaded from the OFAC web site. Specifically, both the LNAME and FNAME fields are compared to both the name and any alias names (a.k.a.) on the associated lists, for any items that are marked as "(individual)."

In the following example, the LNAME field in your credit union's files would be searched to find an exact match to the text ABDUL JAWAD or ABDULJAWAD, the FNAME field would be searched for a match to MOHAMMED or MUHAMMED:

```
ABDUL JAWAD, Mohammed (a.k.a. ABDULJAWAD, Muhammed I.), Tripoli, Libya (individual) [LIBYA]
```

The scan will also scan against birth date (BTDATE field in the MASTER file), increasing the precision of the results. The report will show only the suspect hits where the birth date either matches the OFAC file, or if the system cannot make the comparison because the dates are not formatted in a way for the system to make the comparison (if the date in the file is not in standard format (MMDDYY), for example or is only a year).

In addition, the system will compare text in the *City* field in your files against any country names entered on the initial report screen (see next page). Other than this country match, no comparisons are made on address fields. **For the country scan, only records where the Foreign address flag is checked will be scanned.**

For organizations, the system compares the full organization name from your files against the first 30 characters of the name fields on the SDN and Consolidated Sanctions lists, on any items that are not marked as "(individual)." This field is longer than 30 characters, but if an exact match is found in the first 30 characters the item will be included on the report (following in this section).

If the system finds an **exact** match of a name in both files, a record will be printed on the report showing details of the match. Because of the potential for a "false positive" where a name matches but other details such as the address do not, it is up to your credit union to review the items on the list and make a determination as to whether it is a true match or not. See the report sample on the following page for more information.

Do the OFAC scans scan for long last name?

AUTOMATED RUN OF THE OFAC SCAN

CU*Answers Operations automatically runs the OFAC scan on all members, non-members, and A2A recipients weekly. The report showing suspect hits will be placed in your DAILYxx output queue. The default OUTQ routing will be set to both print and archive. If you do not want to print this, use **Tool #573 OUTQ Report Control** to change your routing settings for the LOFAC report. (If there were no SDN/Consolidated Sanctions list changes during a

particular week, no report will be produced for that weekend.) Use this report to compare your membership file and non-member against the current OFAC file pulled by CU*Answers. Additionally, Account-to-Account (A2A) relationships will be scanned (the A2AMBR file). Items will be scanned against the name, alternate name, and country list.

• Remember that the comparison program checks for an **exact** match to your files. If the names are spelled differently by even one letter, it will not find a match.

Report Sample

You may have a few suspects but the OFAC report to help you determine which hits you need to take action on. The OFAC report is broken down into four sections (open memberships, closed memberships, non-members and A2A) and clearly states the actual name that was deemed suspect by the OFAC scan. Notice the date on which the list was last downloaded from the OFAC website.

6/14/10 13:36.26		*BASE TEST CREDIT UNION			LOFAC	PAGE
	DA'I'A M	ATCH: STATEMENT OF MATCH	ED RECO	DRDS		
List Downloaded From OFAC: 05/10/10						
****** CU FTLES ******** ********		******	ETTE 1	**********		******
ile Name - MASTER		OFAC	LITE .			
ACCT	MATCH		OFAC			
BASE NAME	TYPE	SDN NAME	ID	SDN TYPE	OFAC PROGRAM	OFAC REMARKS
999 VICTOR M MEMBER JR	PLC NAME	MEMBER, LAURA VICTOR	9639	individual	NS: NS-PLC	DOB 1962; POB SI
999 VICTOR M MEMBER JR	Alt PLC	MEMBER, LAURA VICTOR	9639	individual	NS: NS-PLC	DOB 1962; POB S
1276 MARIA D MEMBER	NAME	MEMBER, JOSE MARIA	11995	individual	SDN: SDNTK	Cedula No. 9308
9653 ANDRE MEMBER		MEMBER, ANDRE				DOB 1970.
11368 MEMBER CO	Alt PLC	MEMBER CO	17254	-0-	NS: UKRAINE-E013662	Website www.tra
11368 MEMBER CO	Alt PLC	MEMBER CO OJSC	17254	-0-	NS: UKRAINE-E013662	Website www.tra
11368 MEMBER CO	Alt PLC	MEMBER CO, JSC	17254	-0-	NS: UKRAINE-E013662	Website www.tra
'ile Name - MSNONMBR						
ACCT	MATCH		OFAC			
BASE NAME	TYPE	SDN NAME	ID	SDN TYPE	OFAC PROGRAM	OFAC REMARKS
107628237 EDDY NONMEMBER		NONMEMBER, FREDDY	4527	individual	SDN: SDNT	Cedula No. 7937
369155253 DANIEL S NONMEMBER	NAME	NONMEMBER, DANIEL	817	individual	SDN: CUBA	; Manager, Prom
370111983 DANIEL R NONMEMBER	Alt Name	NONMEMBER, DANIEL	12486	individual	SDN: CUBA	-0-
372389360 MANUEL NONMEMBER	NAME	NONMEMBER, MANUEL MARTIN	1656	individual	SDN: CUBA	-0-
372389630 MANUEL NONMEMBER	NAME	NONMEMBER, MANUEL MARTIN	1656	individual	SDN: CUBA	-0-
ile Name - A2AMBR						
ACCT	MATCH		OFAC			
BASE NAME	TYPE	SDN NAME	ID	SDN TYPE	OFAC PROGRAM	OFAC REMARKS
36038 SANDRA K AMEMBER	Alt Name	AMEMBER, SANDRA	15644	-0-	SDN: LIBERIA	-0-
		*** END OF REPORT	***			

The **Match Type** column will show the source of the match:

- **Country** Text in the City field in one of your files (see File Name column) matched a country entered on the report screen (see previous page).
- **Name** (or PLC NAME) Text in the Last Name and First Name fields in one of your files File Name column) matched the name shown on the SDN or Consolidated Sanctions lists.
- **Alt Name** (or ALT PLC) Text in the Last Name and First Name fields in one of your files (see the File Name column) matched an alternate or "a.k.a." name on the SDN or Consolidated Sanctions lists.

The **OFAC Program** column will show the specific list of the match. Program will begin "SDN:" for the SDN file or "NS:" for the non-SDN Consolidated Sanctions list.

IMPORTANT: All of the matches on this report must be investigated manually and, if necessary, reported according to current OFAC guidelines. Do not contact CU*Answers for guidance on handling these matches; it is your credit union's responsibility to perform due diligence on any matches located by the search. Many will be "false positives" and must be evaluated individually. For more information and current regulations, refer to the following web site:

http://www.treasury.gov/about/organizationalstructure/offices/Pages/Office-of-Foreign-Assets-Control.aspx

OFAC SCANS ON INDIVIDUAL ITEMS

ACTIVATING AUTOMATIC OFAC SCANS OF NEW MEMBERSHIPS

The system can be instructed to automatically scan all new memberships before they are created. This feature helps you catch possible matches before they are entered into your membership rolls.

• **NOTE:** This section is used to describe how to automate the running of an OFAC scan while a membership is manually added to CU*BASE. For memberships added via the online channel of Membership Opening Process (MOP), the first OFAC scan is run prior to the membership being added to CU*BASE during that membership opening process.

NOTE: Unlike the manually run batch scan (page 5), the OFAC scan on individual items does not scan additionally against birth date. All possible matches to first name (FNAME) and last name (LNAME) will be provided.

IMPORTANT: Activating this flag will **require** that you establish clear guidelines for your tellers and MSRs to follow if a suspected match is found. What steps must be taken to verify identity? Who will have authority to determine whether a match is valid or not, and what documentation is needed if the membership is created for a "false positive" match? What will the verbiage on your denial notice be for memberships that are denied because of a match? What "script" will you give your tellers and MSRs so they know how to react to a match when the member is standing in front of them? All of these types of issues must be considered carefully so that your staff is prepared.

Do the OFAC scans scan for long last name?

After your internal policies are in place, use **Tool #1004** *Workflow Controls: Open Mbrships/Accts* to activate this flag. (See page 8 for screen shots of this type of scan.)

Workflow Controls: Open Mbrships/Accts (Tool #1004)

Corp ID 01 ABC CREDIT UNION Branch # 01 ABC CU - MAIN OFFICE		
	Defaults for Workflow	
OFAC scan	Check blocked persons file	☑ ID check
Master greeting setup	Joint owner setup	Beneficiary (POD) setup
Credit report	Open sub-accounts	Loan contract
ARU/Online banking setup	E-statement enrollment	Bill payment enrollment
Email address reminder	Marketing clubs	Photo ID reminder
Use 000000000 when home phone not known	Risk assessment	
Request previous address if at current address less t	han 00 months	
Reg E opt in/out functionality Default all new members	Required Fields	
Reason code	Default code 🛛 🔍 (Blank = no defau	ilt)
	Default code 🦳 🍳 (Blank = no defau	ilt)
Department/sponsor		
	Default state (Blank = no defau	ilt)
Department/sponsor Driver's license # and state Wother's maiden name		lt)
Department/sponsor Driver's license # and state		lt)
Department/sponsor Driver's license # and state Wother's maiden name		it)
Department/sponsor Driver's license # and state Ø Mother's maiden name		it)

If you wish to activate this scan, be sure to check the *OFAC* scan option in your credit union's Workflow Controls configuration. (See Page 14 for details about the monthly fee that will begin being charged when this is activated.)

Remember that a batch OFAC scan will be run on your entire membership each weekend by Operations staff. See Page 5 for more details.

For the individual scan, the program looks at last name first. If the first name happens to be spelled incorrectly, the name will pass the scan. The first name is only checked if there is a hit on the last name.

The batch scan of your entire membership does a more thorough verification, checking last name and first name independently.

RUNNING NEW MEMBER AND NON-MEMBER SCANS

If activated, scans will be run automatically:

- When a credit union employee opens a new membership in CU*BASE (see Page 10).
- When approving a membership application submitted through online banking (see Page 12)
- When creating or modifying a non-member record for any reason, such as a joint owner, misc. owner, beneficiary, co-borrower, etc. (see Page 12).
- During pre-membership lending when non-member information is entered while determining if a member qualifies for a loan. (see Page 13).
- When a loan application comes in via indirect third-party. See page 14.

• When a membership is approved that is initiated via the Online Membership Application.

Tracking of these scans is covered in the last section of this booklet.

Open/Maintain Memberships/Accounts (Tool #3)

			SE GOLD Edition - ABC CREDIT UNION	N				
		File Edit Tools	Help					
		Open Ne	ew Membership	o				Individual
		Date opened	Dec 30, 2013			e-Document Strategies	Scan e-Document View e-Document	 Joint owners Beneficiaries
		Branch #	01 ABC CU - MAIN OFF	FICE		Juniogic_	View e-Document	Beneficiarios
If your OFAC report	I			Requi	red Information	_		
normally scans	i I	Name	TOM	•		999-85-2357 N	lame ID ME	
against a list of	i I	Gender	Male Female Unk		Designation	MI Individua		
countries (see Page	heck the	Birth date	Jan 01, 1970 📑 [MMDD]					
5), check the		DBA name			Foreign address	s 🔲 Foreign citiz	zen	
Foreign address	i I	Address #1	123 TEST ROAD		Home phone	555 5555555		
flag and enter the	i I	Address #2			Work phone		xt	
address including		City	GRAND RAPIDS	-	Cell phone		9 1 94	
Country before		State	MI		Fax			
running the scan.		ZIP code	55555 0000		Certify address			
		County						
		Date moved to		YYYY]				
	1	Home type	⊙ Own ⊙ Rent ⊚ N/A					
	1							
	1	Driver's license	A1123456789		State	MI		
		Other ID			Full middle name			
		ID Check	Blocked Persons	Credit Report				
		$\leftarrow \rightarrow \land$	II 🛎 🖋 i ? @					FR (2429) 12/30/13

If the OFAC scan has been activated in your workflow controls, after this initial membership information screen has been filled in the system will run the scan automatically when you press Enter (you can also use *OFAC Scan* (F18) in the Timeout window to run the scan at any time).

If no match is found, the following window will appear. Use Enter to continue and proceed to create the membership as usual.

Session 0 CU*BASE GOLD Edition - OFAC Scan				
Verification process complete; no hits found.				
Continue				
← → ↑ !! ≛ ♂ i ? @	FR (388)			

If a suspected match is found, the following screen will appear instead showing all of the matches found:

ame entered						
		Match(es) Found in the Cur	rrent OFAC List			
Match Type	SDN Name	OFAC ID	SDN Type	OFAC Program	-	OFAC Remarks
lt Name	, ANITA		indiv	CUBA	-0-	
						T

The data on this screen is the same as that shown on the OFAC report shown on Page 6.

Command Keys

Field Name	Description				
Denial Notice (F10)	Use this to proceed to the initial "Denied Application Processing" screen to create a denial notice and cancel the membership creation process. The system will automatically create a non-member record.				
	If a membership notice is actually <i>printed</i> , CU*BASE will also mark the <i>Deny membership</i> flag on the non-member record, along with the Denial Type code used (as the reason for the denial), and the date.				
	🛠 Session O CUrBASE GOLD Edition - ABC CREDIT UNION 🔷 🕞 💿 📷				
	Non-Member Information CHANGE				
	Name (FML) JOBH HEMBER Name ID HE Corp ID 1 SN 999-87-4698 Birth date Jan 01, 1970 [MMD0YYY7] Date of death 00000000 [MMD0YYY7]				
	Allow Jelles Bennechtons Tröteign citizen Gender Emaile Male Ø Deny membership Denial reason CO				
	If this same person attempts to open a membership in the future, the system will provide a warning message showing that membership was denied, so that additional research can be done.				
Override/ Continue (F20)	Use this to override the results of the scan and proceed to create the membership. Follow your credit union's established procedures for documenting a membership that is created after a suspected OFAC match was found.				

IMPORTANT: Matches must be investigated manually and, if necessary, reported according to current OFAC guidelines. **Follow your credit union's**

standard policies for handling any matches. Do not contact CU*Answers for guidance on handling these matches; it is your credit union's responsibility to perform due diligence on any matches located by the search. Many will be "false positives" and must be evaluated individually. For more information and current regulations, refer to the following web site:

http://www.treasury.gov/about/organizationalstructure/offices/Pages/Office-of-Foreign-Assets-Control.aspx

equest # 080	Last name starting		Request date	starting	000	00000	MMDDYYY	YJ
.pp #	Application Name	Home Phone	Work Phone	Ext	Corp	Rel Code	App Date	Email
3063 KIRK		616	616	12345	01		May 06, 2013	@cuanswers.com
<u>A</u> pprove <u>V</u> iew	■ <u>C</u> hange ■ <u>L</u> ook up	■ <u>D</u> eny ■ <u>R</u> equest credit r	■ D <u>e</u> let eport ■ Vie <u>w</u>					^

Work Online Banking Apps/Requests (Tool #13)

The same OFAC scan will be run automatically when you use the *Approve* option on this screen to approve a membership application.

The OFAC scan will also be run when you use the *Change* or *View* option to view or change membership application information before approving it. (The scan will be run automatically when Enter is used to save changes.) If a match is found, the Verify New Member Identity information screen shown on Page 11 will appear.

The edit will also be run on joint owners, if any, attached to this application. Additionally any names that are attached via an A2A relationship (in the A2AMBR) file will be re-scanned.

Work with Non-Member Database (Tool #997)

Session 0 CU*BASE GOLD Editio	on - ABC TESTING CREDIT UN	ON					<u> </u>
File Edit Tools Help							
Non-Member	Information						CHANGE
Name (FML)			Name ID		Corp ID 1	SSN	-9999
Birth date 0000000	[MMDDYYYY]		Date of death	00000000	IMMI	DYYYYJ	
Allow teller transactions	Foreign citizen		Gender	<u>Female</u>	⊚ <u>M</u> ale		
Deny membership							
	Current Address				Previous Ad	ldress	
Address			Address				
City	State	ZIP	City			State	ZIP
County							
Home phone			Home phone				
Work phone	Ext						
Cell phone							
Moved 0000000	[MMDDYYYY]		Moved	00000000	📑 (MMI	DDYYYYJ	
Own/rent © Own @	<u>R</u> ent		Own/rent	© Ow <u>n</u> ©	Rent		
Landlord	Landlor	I phone	Landlord			Landlord	phone
Foreign address	<u>Certify</u> address						
Sort field (User	r-defined) Letter co	ode	Department/sp	oonsor #		Members	nip designation 📃 🍳
DBA name			Marital status	Married	Separated	⊚ <u>U</u> nmarri	ed
License #/State		Photo ID on file	Work With	Email Addres	SS		
Delete O	rganization	ID Check	Verify Name		Blocked Persor	16	
		ID CHECK	verny wante		biocked Person	13	
←→↑□≞♂	<i>i</i> ?@						FR (965) 8/08/13

The OFAC scan will be run whenever you use this screen to create or update a non-member record. Non-member records are created through various CU*BASE processes, such as creating joint owners, misc. owners, beneficiaries, loan co-borrowers, IRA beneficiaries, etc.

The scan will be run automatically when Enter is used to save changes, or you can initiate the scan by clicking the "Check" button next to the name (or *Verify Name* (F15)). If a match is found, the Verify New Member Identity information screen shown on Page 11 will appear.

Pre-Membership Lending

[dition - Pre-Membership Lending				
Loan requested by					
Address 1		Home phone	000 0000000		
Address 2		Work phone	000 0000000		
City		Cell phone	000 0000000		
State		Birthdate		[MMDDYYYY]	
ZIP code		Dept/Sponsor #			
Change to Org Accoun	t Department/Sponsor #	Blocked Persons			
$\leftarrow \rightarrow \land \parallel$	<i>₽ i ?</i> @				FR (2570)

Additionally, when non-member information is entered during premembership lending, this non-member will be run through an OFAC scan. After the name and birth date are entered in the screen below, the person is run through scans just as with other non-members entered into the system.

When is an OFAC scan run on a membership that is initiated online? Where can I find a record of the OFAC scan? When is an OFAC scan recorded on the OFAC tracker of the membership?

Do the OFAC scans scan for long last name?

ADDITIONAL ITEMS WITH AUTOMATIC SCANS

In addition to running an OFAC scan on all items in your database, OFAC scans are run when certain action are made to accounts, followed by the item that is scanned:

- Non-Members added as Joint Owners, Misc. Owners, or Beneficiaries, for example
 - NOTE: Non-members are only scanned if they constitute a newly-added record to the non-member (MSNOMBR) file. An existing non-member record (for example someone who is already joint on an account) is not scanned again by the automatic scan when added as a secondary name on an additional account.
- Outgoing wires (Payee, Financial Institution and Financial Institution Name, if entered.) NOTE: OFAC scans are not run on wires sent to International addresses.
- Incoming International ACH Transactions (IAT) (All addendum items)
 - NOTE: Refer to the ACH Exceptions Screen help topic in CU*BASE Online help for more information about handing IAT that fail the OFAC scan.
 - NOTE: This OFAC scan also scans against country code.
- Existing A2A Account Relationships (Name and Financial Institution)
- Money Orders (Payee) (created via Phone Operator or Teller)
- Corporate Checks (Payee) (created via Phone Operator, Teller or during the loan disbursement process via **Tool #50** *Disburse Member Loan Funds*
- Redeeming a Certificate via check (dispersed via **Tool #22** *Close Membership/Accounts*. (Note: If the member elects to redeem a check in online banking, an OFAC scan is run when the check is printed by the credit union.

(This kind of scan will use the same OFAC screens used when you run a manual scan. See following section.)

INDIRECT THIRD-PARTY LOAN APPLICATIONS

When a loan application comes into the loan queue from an indirect third party with a co-applicant and the SSN does not match a current member, it creates a non-member loan request. When the user takes the 'create' option, they are brought into the Open Membership process.

The system however does not do the following:

- Will not automatically run an OFAC scan on any co-applicant. This must be done in a separate step prior to adding the person to the membership.
- Will not automatically add the co-applicant to the membership process.

- Will not bring in the SSN or data for the co-applicant on the loan into the membership open process. Co-applicants must be separately added as joint owners on the membership.
- Will not automatically run an OFAC on the co-applicant of the loan if the co-applicant is not added to the membership.

RUNNING AN OFAC SCAN ON DEMAND

You may however, want a way to run an OFAC scan on any data at any time. A standalone OFAC scan feature can be accessed via two locations: the CU*BASE Time-Out window or via **Tool #778** Scan a Single Name **Through OFAC**. This feature allows you to run a quick OFAC scan on a single item on demand, such as incoming wires, vendor names, other miscellaneous corporate checks, etc. While an employee must enter an employee ID and password to access it from the Time Out window, no additional security has been placed on this option. (The Employee ID is used when documenting a failed scan on a member account.)

This feature is used for stand-alone items that do not have an OFAC scan run on them, such as:

- Accounts Payable Vendors
- Incoming Wires
- Miscellaneous expense checks or A/P checks
- Other miscellaneous names or countries that need to be verified during day-to-day work

Scan a Single Name Through OFAC (Tool #778) Or "OFAC Scan" (F18) from the Time Out Window

OFAC Scan – Individual

Session 0 CU*BASE GOLD F	dition - ABC TESTING CREDIT UNION	â - • e
File Edit Tools Help		
OFAC Name	Breakdown	
on no maine		
Entered name JOHN Q	PUBLIC	
First name JOHN		
Middle initial Q		
Last name PUBLIC		
	Countries on Suspect List	
Country ID	Country Name	
	BALKANS DARFUR	
BY CD	BELARUS DEMOCRATIC REPUBLIC OF THE CONGO	
CI CU	COTE D'IVOIRE CUBA	
IQ IR	TRAQ IRAN	
1.	↑ ↓	
	To properly perform the OFAC scan, please break the entered name down into first name, middle initial	
Organization Account	(if applicable), and last name. The first and last name fields are required.	
Continue	In approximity, and last nume. The mat and hast nume nerve are required.	
	8 i ? @	FR (3865) 5/02/13

OFAC Scan - Organizational

Session 0 CU*BASE GOLD Ed	ition - ABC TESTING CREDIT UNION	🔒 🗉 💌
File Edit Tools Help		
OFAC Name	Breakdown	
Entered name JOHN Q	PUBLIC	
Organization name JO	HN Q PUBLIC	
	Countries on Suspect List	
Country ID	Country Name	
	BALKANS DARFUR	
BY CD	BELARUS	
CD	DEMOCRATIC REPUBLIC OF THE CONGO COTE D'IVOIRE	
CU	CUBA	
CU CU IQ IR	IRAQ IRAN	
	↑ ↓	
	To properly perform the OFAC scan, please break the entered name down into first name, middle initial	
Organization Account Continue	(if applicable), and last name. The first and last name fields are required.	
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- The window will default to the individual screen. Use *Organization Account* (F9) to move to the Organizational screen.
- You may be asked to enter your Employee ID and password (to be recorded on the Audit Tracker Record see following section). The Account base (optional) will also be used to record an Audit Tracker.
- NOTE: (Trackers are only recorded for membership accounts nonmembers will not receive an Audit Tracker record.)

Enter the name or use *Organization Account* (F9) to enter an organization name.

Press Enter to run the scan on the item. The scan will either result in a Pass or Suspect. A Suspect must either be marked as Failed by using *Record as Failed* (F10) or be overridden by using *Override/Continue* (F20).

Successful Scan

Session 0 CU*BASE GOLD Edition - OFAC Scan	
Verification process complete; no hits found.	
Continue	
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Suspect Scan

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	😢 Session 0 CU*	ASE GOLD Edition - ABC TESTING CREDIT UNION			â • e
	File Edit Tool	; Help			
	Verify	New Member Identity			
	verny	New Member Identity			
	Warning! A p	ossible match has been found in the current OFAC	List.		
	Name entere	i a ally			
		M 4 7	h(es) Found in the Current	0540114	
		1			
	Match Type Alt Name	SDN Name ALLY, AHMED		SDN Type OFAC Program div SDGT	OFAC Remarks DOB 9 Apr 1969; alt.
	Alt Name	ALLY, FAHID MOHAMMED	06929 in	div SDGT	DOB 19 Feb 1976; POB
					↑ ↓
irii kii l					
If the scan results in a					
"Suspect", you must either					
use F10-Record as Failed	N				
or F20- Override/Continue.	Record as Fail	ed Be sure to follow credit union	policies regarding verifyir	na identity	
	Override/Conti		poncies regularing verifyin	ng lucinity.	
	$\leftarrow \rightarrow \uparrow$				ED (2000) 0/20/10
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	1				

To override a Suspect scan, use Override/Continue (F20).

This will take you to the Tracker Entry screen where you can record the reason for the override. This conversation will be added to the member's Audit Tracker.

Why do I not receive a suspected match when I run a misspelled name through the OFAC scan?

For the individual scan, the program looks at last name first. If the first name happens to be spelled incorrectly, the name will pass the scan. The first name is only checked if there is a hit on the last name.

The batch scan of your entire membership does a more thorough verification, checking last name and first name independently.

TRACKING OF OFAC SCANS

AUDIT TRACKER RECORDS SCANS ON MEMBERSHIPS

The OFAC scan can be run interactively one account at a time or on demand on the entire database. Each time an OFAC scan is run on a membership (new or existing) or on an item connected to a membership (such as an Account-to-Account (A2A) relationship), an Audit Tracker conversation is added to the member's Audit Tracker.

If a member passes the scan, the conversation will be appended to his or her Audit Tracker with a Memo Type of *OP* (Passed) reading, "OFAC scan run on mm/dd/yyyy. No suspected match." If a member fails this scan, the pop up window will appear allowing the employee to deny membership or override the scan. Selecting *Denial* (F10) does not create an Audit Tracker record because the person does not become a member and non-members currently do not have Audit Trackers. Selecting *Override* (F20) will, however, create a Tracker with a Memo Type of *OO* (Overridden) and the message text "Possible OFAC match found on mm/dd/yyyy Override performed by: XX," with XX being the employee ID.

Although member and non-members are run through the database, at this time trackers are only created for member accounts. You can use the Denial Notices and "Deny Membership" flag to mark non-member accounts when you deny membership of a member because of a hit on the initial OFAC scan.

When this report is run manually by the credit union, members with possible matches receive a conversation appended to their *AT* Tracker with a Memo Type of *OF* (possible match found) with a message reading, "OFAC scan was run on mm/dd/yyyy. Possible match found." If a member passed the scan he or she receives a new conversation appended to his or her *AT* Tracker with the Memo Type of *OP* (Passed) with a message reading, "OFAC scan run on mm/dd/yyyy. No suspected match."

AUDIT MEMBERSHIPS INITIATED ONLINE

When is an OFAC scan run on a membership that is initiated online? Where can I find a record of the OFAC scan? When is an OFAC scan recorded on the OFAC tracker of the membership?

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.
 - NOTE: If your credit union has made the business decision to hide the base account on this membership, select another sub account instead at this step. On the Member Tracker Review screen you will see on the next page, enter 000 in the Account Type field and press Enter to view the Trackers for the membership.

Member Account Inquiry (Use "Tracker Review" (F21))

Member A		ount Inquiry	/						
MSR		Account #	JOHN G MEMBER				Date ope	ned Dec 1	2, 1964
ATM ID		Joint Owners	Beneficia	ries			G/L acco	int 90	1.00-01
# ATM W/D	1	Account type 000	REGULAR SAVINGS						
# ATM overdrafts		Div appl SH	REGULAR SAVINGS						
# Withdrawals	0								
# Transfers	0	Outstanding accrued	club benefits 0.00						
Frozen O	NO	Current balance	2,736.29	Annual b/u	withholdin	a	9.00		
Passbook	NO	- par value	5.00	Period aver			3,565.87		
AFT	YES	- secured	0.00	Period min	-		3,536.29		
Payroll	NO	- uncollected	0.00				-,		
		= Net available	2,731.29	YTD club be	nefits		0.00		
lew Account	- 3	1st date negative	0000000						
lew Account Type									
)ividend Calculator				Div	idend Infor	mation		_	
ISF					Quarte	er 1	0.18	Total	0.18
Incollected Funds						2	0.00	Accrued	0.13
ecured Funds						3	0.00		
TB/Cards						4	0.00		
RA/HSA									
ayroll									
racker Review						Trans	action inquiry date	Aug 15 201	3 MMDDY
Overdraft Protection						mansa	action inquiry date	nug 15, 201	

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.

Member Tracker Review (1)

Session 0 CU*BASE GOLD Edition - ABC	TESTING CREDIT U	INION			<u> </u>	
File Edit Tools Help	D					
Member Tracker	Review					
Member JOHN G 1	MEMBER					
		Selec	tion Options			
Date	📑 [MMDDYYYY]	Time				
Account type 000		Tracker type	ଷ୍			
Reference						
Date Time	Account Type	Reference SALES_TRACKER		Speaking With	Туре	ID
6/20/2013 13:42:17 8/06/2013 11:10:27 8/27/2013 14:28:57	000 000	Member	John G Member John G Member		SALE MBRS	;Y ZE
8/27/2013 14:28:57	000	Audit Tracker	JOHN G. MEMBER		audt	92
■ <u>V</u> iew ■ <u>U</u> pdate						↑↓
						• •
Consolidate						
Work Follow Ups						
Tracker Entry						
Cross Sales Tasks						
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- NOTE: If your credit union has made the business decision to hide the base account on this membership, enter 000 in the Account *Type* field and press Enter to view the Trackers for the membership.
- 3. 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 OFAC scan.

Member Tracker Review (2)

券 Session 0 CU*BASE GOLD Edition - Member Tracker Review	<u> </u>
File Edit Tools Help	
Member Tracker Review	
Account MARY 6 MEMBER Conversations 456 Position to date Dec 10, 2014 II [MMDDYYYY]	
Contact - Date: 12/10/2014 Time: 15:57:49 By Emp: +A Name: MARY 6 MEMBER Meno Type: OP OFAC/PLC Pass OFAC scan run on 12/10/2014. No suspected match.	
Contact - Date: 12/10/2014 Time: 13:46:10 By Emp: 92 Name: MARY G. MEMBER Memo Type: OP OFAC/PLC Pass OFAC scan run on 12/10/2014 No suspected match. Scan run for name: MARY G. MEMBER For check creation	
Contact - Date: 12/10/2014 Time: 11:57:01 By Emp: #A Name: MARY G MEMBER Meno Type: OP OFAC/PLC Pass OFAC scan run on 12/10/2014. No suspected match.	
Contact - Date: 12/09/2014 Tine: 15:40:31 By Enp: 92 Name: MARY 6 MEMBER Meno Type: 00 OFAC/PLC Overrd Possible OFAC match found on 12/09/2014 Override performed by: 92 No text entered Scan run for name: ACECHILLY	
↑ ↓	
Sort Contact Date	
	FR (4573) 1/07/15

AUDITING OFAC SCANS ON NON-MEMBERS

The dashboard accessed via **Tool #559** *OFAC Non-Member Scan History* shows scans run on non-members for the last eighteen months, the range most commonly asked for by auditors, although you can choose any range you like. You can also look for anything contained in a name, a SSN, or scan status that appears in the Scan Result field. These items must be in the order they appear on the screen and you can use the % sign as a wildcard to separate different pieces of data.

For example, if you enter this in the *Look for a name or SSN or scan status containing* field, you would find failed OFAC scans for John Member or Mary Johnson:

Look for a name or SSN or scan status containing

JOHN%FAILED

• NOTE: This history dashboard runs includes a lot of data, so be patient as the list populates!

Enter a date range and any filter information and press Enter to view the results.

OFAC Non-Men	iber Scan	History	(Tool #559)
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Scan Description Scan Date Scan Result PEN NEW MENBERSHI 8/19/2015 0FAC scan run for for SSN 123478956 Passed 000000000000000000000000000000000000	IDPEN NEW HENDERSHIL 6/19/2015 0FAC scan run for for SSN 123470956 Passed IDPEN NEW HENDERSHIL 6/19/2015 0FAC scan run for for SSN 123470956 Passed IDPEN NEW HENDERSHIL 6/19/2015 0FAC scan run for for SSN 123470956 Passed IDPEN NEW HENDERSHIL 6/17/2015 0FAC scan run for JULE for SSN Passed IPEN NEW HENDERSHIL 6/17/2015 0FAC scan run for JULE for SSN Passed IPEN NEW HENDERSHIL 6/17/2015 0FAC scan run for BILLE for SSN Passed IPEN NEW HENDERSHIL 6/11/2015 0FAC scan run for BILLE for SSN Passed IPEN NEW HENDERSHIL 6/11/2015 0FAC scan run for BILLE for SSN Passed IPEN NEW HENDERSHIL 6/11/2015 0FAC scan run for HARULYN for SSN Match found IPEN NEW HENDERSHIL 6/11/2015 0FAC scan run for HARULS J. MILLER for SSN 0000000001 Passed IDN-HENDER MAINT 5/21/2015 0FAC scan run for ID FEFERY for SSN 0000000001 Passed IDN-HENDER MENTHIN 5/21/2015 0FAC scan run for ID FEFERY for SSN 0000000001 Passed IDN-HENDER MENTHIN 5/21/2015 0FAC scan run for ID FEFERY for SSN 00000000001 Passed </th <th>Scan Description Scan Date Scan Result DEN NEW MEMBERSHT 8/19/2015 OFAC scan run for for SSN 123478956 Passed DEN NEW MEMBERSHT 8/19/2015 OFAC scan run for for SSN 123478956 Passed MEMBER MAINT 8/19/2015 OFAC scan run for for SSN 123478956 Passed MEMBER MAINT 8/19/2015 OFAC scan run for for SSN 123478956 Passed MENDERSHT 8/06/2015 OFAC scan run for JUE VEN NEW MEMBERSHT 6/12/2015 OFAC scan run for for SSN Passed VEN NEW MEMBERSHT 6/11/2015 OFAC scan run for for SSN Match found VEN NEW MEMBERSHT 6/11/2015 OFAC scan run for for SSN Match found VEN NEW MEMBERSHT 6/11/2015 OFAC scan run for for SSN Match found VEN NEW MEMBERSHT 6/11/2015 OFAC scan run for for SSN Match found VEN NEW MEMBERSHT 6/11/2015 OFAC scan run for for SSN Match found N=MEW MEMBERSHT 5/21/2015 OFAC scan run for for SSN 000000001 N=MEW MEMBERSHT 5/21/2015 OFAC scan run for for SSN 10 Passed N=MEW MEMBERSHT 5/21/2015 OFAC scan run for for SSN 10 Passed N=MEMBE</th> <th>Scan Result an run for for SSN 123478956 Passed an run for for SSN 123478956 Passed an run for SUE for SSN Passed an run for JOHN 0, PUBLIC for SSN Passed passed an run for JOHN 0, PUBLIC for SSN Passed passed an run for BLL E. for SSN Passed an run for HARDLD for SSN Passed an run for HARDLD for SSN Passed an run for MARILYN for SSN SD Passed an run for Gr SSN SD SD Passed an run for Gr SSN SD SD Passed an run for Gr SSN SD SD Passed an run for Gr SSN SN D Passed an run for ILL for SSN SN Passed an run for Gr SSN SN Passed an run for Gr SSN SN Passed an run for MTHONY for SSN SN Passed an run for ArtHony for SSN 01 Passed an run for ArtHony for SSN 01 Passed an run for ArtHony for SSN 01 Passed an run for ArtHony</th> <th>or OFAC scans run bet</th> <th>ween Jan 16, 2014 📰 and Sep 16, 2015 📰 [MMDDYYYY]</th> <th></th>	Scan Description Scan Date Scan Result DEN NEW MEMBERSHT 8/19/2015 OFAC scan run for for SSN 123478956 Passed DEN NEW MEMBERSHT 8/19/2015 OFAC scan run for for SSN 123478956 Passed MEMBER MAINT 8/19/2015 OFAC scan run for for SSN 123478956 Passed MEMBER MAINT 8/19/2015 OFAC scan run for for SSN 123478956 Passed MENDERSHT 8/06/2015 OFAC scan run for JUE VEN NEW MEMBERSHT 6/12/2015 OFAC scan run for for SSN Passed VEN NEW MEMBERSHT 6/11/2015 OFAC scan run for for SSN Match found VEN NEW MEMBERSHT 6/11/2015 OFAC scan run for for SSN Match found VEN NEW MEMBERSHT 6/11/2015 OFAC scan run for for SSN Match found VEN NEW MEMBERSHT 6/11/2015 OFAC scan run for for SSN Match found VEN NEW MEMBERSHT 6/11/2015 OFAC scan run for for SSN Match found N=MEW MEMBERSHT 5/21/2015 OFAC scan run for for SSN 000000001 N=MEW MEMBERSHT 5/21/2015 OFAC scan run for for SSN 10 Passed N=MEW MEMBERSHT 5/21/2015 OFAC scan run for for SSN 10 Passed N=MEMBE	Scan Result an run for for SSN 123478956 Passed an run for for SSN 123478956 Passed an run for SUE for SSN Passed an run for JOHN 0, PUBLIC for SSN Passed passed an run for JOHN 0, PUBLIC for SSN Passed passed an run for BLL E. for SSN Passed an run for HARDLD for SSN Passed an run for HARDLD for SSN Passed an run for MARILYN for SSN SD Passed an run for Gr SSN SD SD Passed an run for Gr SSN SD SD Passed an run for Gr SSN SD SD Passed an run for Gr SSN SN D Passed an run for ILL for SSN SN Passed an run for Gr SSN SN Passed an run for Gr SSN SN Passed an run for MTHONY for SSN SN Passed an run for ArtHony for SSN 01 Passed an run for ArtHony for SSN 01 Passed an run for ArtHony for SSN 01 Passed an run for ArtHony	or OFAC scans run bet	ween Jan 16, 2014 📰 and Sep 16, 2015 📰 [MMDDYYYY]	
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DN-MEMBER MAINT 5/21/2015 OFAC scan run for for SSN Passed DN-MEMBER MAINT 5/21/2015 OFAC scan run for ANTHONY for SSN 01 Passed DN-MEMBER MAINT 5/21/2015 OFAC scan run for SISN 5/21 Passed	DN-MEMBER MAINT 5/21/2015 OFAC scan run for for SSN Passed DN-MEMBER MAINT 5/21/2015 OFAC scan run for ANTHONY for SSN 01 Passed DN-MEMBER MAINT 5/21/2015 OFAC scan run for SISN for SSN 01 Passed	NH-MEBBER MAINT 5/21/2015 OFAC scan run for for SSN Passed NH-MEBBER MAINT 5/21/2015 OFAC scan run for ANTHONY for SSN 01 Passed NH-MEMBER MAINT 5/21/2015 OFAC scan run for SUSAN for SSN 25 Passed	an run for for SSN Passed an run for ANTHONY for SSN 01 Passed an run for SUSAN for SSN 25 Passed		5/21/2015 UFAC scan run for for SSN / Passed	
DN-MEMBER MAINT 5/21/2015 OFAC scan run for ANTHONY for SSN 01 Passed DN-MEMBER MAINT 5/21/2015 OFAC scan run for SUSAN for SSN 25 Passed	DN-MEMBER MAINT 5/21/2015 OFAC scan run for ANTHONY for SSN 01 Passed DN-MEMBER MAINT 5/21/2015 OFAC scan run for SUSAN for SSN 25 Passed	IN-MEMBER MAINT 5/21/2015 OFAC scan run for ANTHONY for SSN 01 Passed IN-MEMBER MAINT 5/21/2015 OFAC scan run for SUSAN for SSN 25 Passed	an run for ANTHONY for SSN 01 Passed an run for SUSAN for SSN 25 Passed			
DN-MEMBER MAINT 5/21/2015 OFAC scan run for SUSAN for SSN 25 Passed	DN-MEMBER MAINT 5/21/2015 OFAC scan run for SUSAN for SSN 25 Passed	IN-MEMBER MAINT 5/21/2015 OFAC scan run for SUSAN for SSN 25 Passed	an run for SUSAN for SSN 25 Passed			
					5/21/2015 OFAC scall for infinont for SIS 25 Deser	
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EASILY VIEW A SINGLE NON-MEMBER'S OFAC SCAN FROM COMMONLY-

USED NON-MEMBER SCREENS

Additionally, while the person remains a non-member, the OFAC scans for this single member can be found on the Non-Member OFAC Notes screen. This screen is accessed by the OFAC Notes button on the Non-Member Notes screen. The Non-Member Notes screen is a handy tool that allows credit union personnel the opportunity to write notes on non-members from screens commonly used with non-members such as the Non-Member Update screen (Tool #997), the Underwriter Comment screen (for pre-membership loan applications), and the online banking membership requests screen (Tool #13).

Session 0 CU*BASE GOLD - SUCCESS CREDIT UNION File Edit Tools Help	1	፱ – □ >	×
Non-Member OFAC Notes			
SSN 99 JDN C MEMBER Notes 2 Position to date MMDDDYYYY]			
Date: 04/17/18 Time: 13:15:05 By: Emp: OFAC scan run for JON C. MEMBER for SSN 999 Passed			
Date: 04/16/18 Time: 09:55:17 By: Emp: OFAC scan run for JON C. MEMBER for SSN99 Passed			
	↑ ↓		
Sort Contact Date $\leftrightarrow \rightarrow \uparrow \parallel \blacksquare \mathscr{S} i ? @$		F6 (6615) 4/20/18	8

Once this non-member becomes a member, these OFAC scans are still available via Tool #559.

This dashboard is based on the CU*BASE OFACNOTE file that records all OFAC non-member scans (and scans that cannot be attached to a MASTER record). Following is an example of the contents of the file:

	Scan	Scan	Scan	Scan	Scan	n Scan
	Reason	Program	Date	Time	User	r Info
	OFAC FINCEN	Description	CCYYMMDD	HHMMSS		
00001	OFAC	SCAN for check creat	20,100,830	140,918	-9	OFAC scan run for DENNIS E. MEMBER for SSN 000000000 Passed
00002	OFAC	OPEN NEW MEMBERSHIP	20,100,903	94,219	- 9	OFAC scan run for GERLINDE MEMBER for SSN 111111111 Passed
00004	OFAC	SCAN A SINGLE NAME	20,100,908	91,500	- 9	OFAC scan run for MARY M. SMITH for SSN 00000000 Passed
00005	OFAC	OPEN NEW MEMBERSHIP	20,100,908	91,930	-7	OFAC scan run for TESTARCH2 TESTARCH2 for SSN 100000002 Pass
00006	OFAC	SCAN A SINGLE NAME	20,100,908	93,559	-9	OFAC scan run for MARY M. SMITH for SSN 000001234 Passed
80000	OFAC	NON-MEMBER MAINT	20,100,908	173,011	-9	OFAC scan run for MY HEIR for SSN 111111111 Passed

NOTE: An "OPEN NEW MEMBERSHIP" scan is included in the sample above. This is because at the time the scan was run, there was no MASTER record. Once the membership is created, an Audit Tracker record is recorded for the membership.