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 http://www.treasury.gov/about/organizational-structure/offices/Pages/Office-of-Foreign-Assets-Control.aspx 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                          CU*BASE TEST CREDIT UNION                                  LOFAC              PAGE   1
                                          DATA MATCH:  STATEMENT OF MATCHED RECORDS

 List Downloaded From OFAC:  05/10/10

 ******* CU FILES ********** ****************************************** OFAC FILE ***************************************************
File Name -  MASTER
      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 Sh
       999 VICTOR M MEMBER JR             Alt PLC  MEMBER, LAURA VICTOR      9639 individual   NS: NS-PLC           DOB 1962; POB SH
      1276 MARIA D MEMBER                 NAME     MEMBER, JOSE MARIA       11995 individual   SDN: SDNTK           Cedula No. 93085
      9653 ANDRE MEMBER                   PLC NAME MEMBER, ANDRE             9653 individual   NS: NS-PLC           DOB 1970.
     11368 MEMBER CO                      Alt PLC  MEMBER CO                17254 -0-          NS: UKRAINE-EO13662  Website www.tran
     11368 MEMBER CO                      Alt PLC  MEMBER CO OJSC           17254 -0-          NS: UKRAINE-EO13662  Website www.tran
     11368 MEMBER CO                      Alt PLC  MEMBER CO, JSC           17254 -0-          NS: UKRAINE-EO13662  Website www.tran

File Name -  MSNONMBR
      ACCT                                MATCH                                OFAC
      BASE NAME                           TYPE     SDN NAME                     ID  SDN TYPE     OFAC PROGRAM         OFAC REMARKS
 --------- ------------------------------ -------- ------------------------ ----- ------------ -------------------- ----------------
 107628237 EDDY NONMEMBER                 NAME     NONMEMBER, FREDDY         4527 individual   SDN: SDNT            Cedula No. 79376
 369155253 DANIEL S NONMEMBER             NAME     NONMEMBER, DANIEL          817 individual   SDN: CUBA            ; Manager, Promo
 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-

File 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/organizational-structure/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.

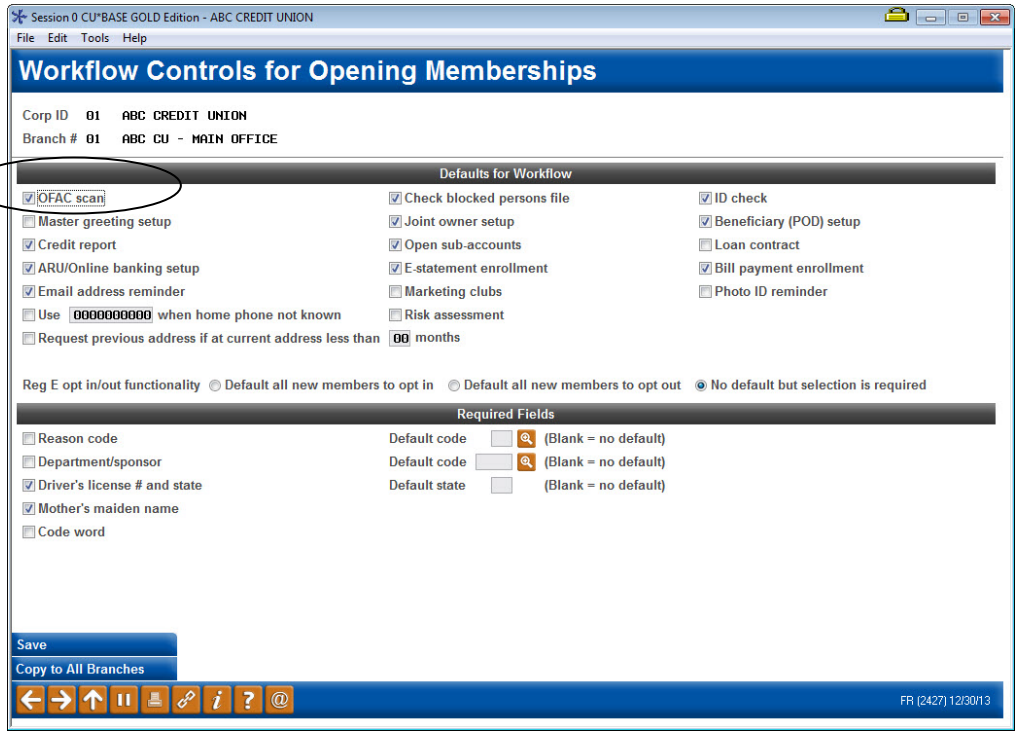
NOTE: Unlike the manually run batch scan (page 5), the OFAC scan on individual items does not scan additionally against birth date. All possible matches to first name (FNAME) and last name (LNAME) will be provided.

> *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)**



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:

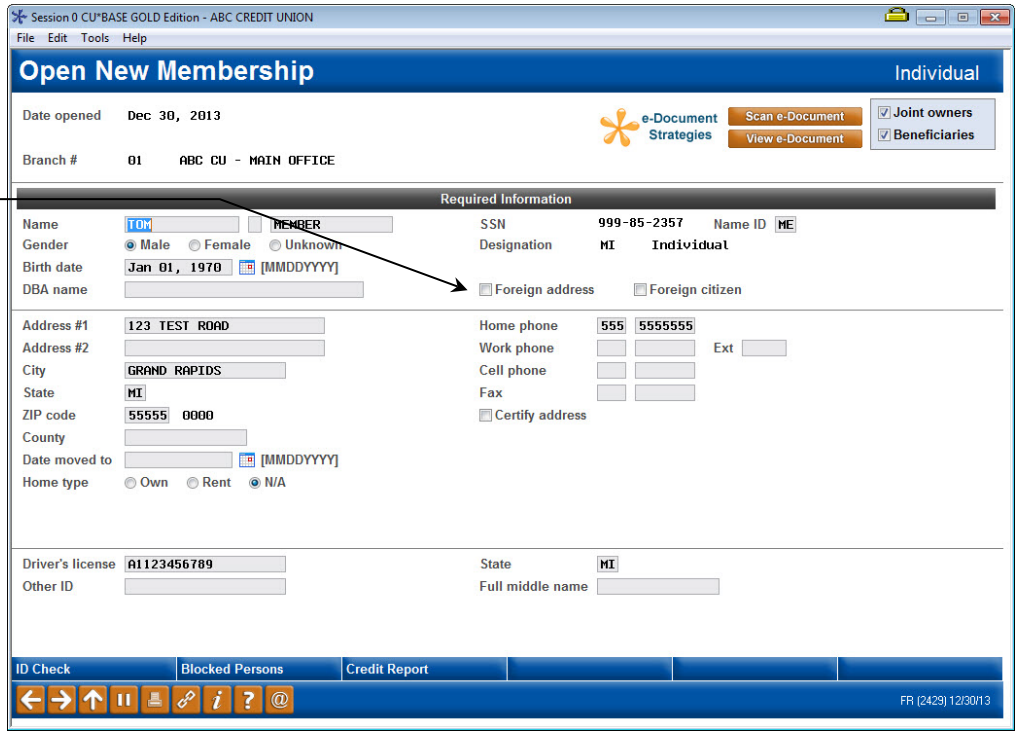
- When a credit union employee opens a new membership in CU*BASE (see Page 10).
- When approving a membership application submitted through online banking (see Page 12)
- When creating or modifying a non-member record for any reason, such as a joint owner, misc. owner, beneficiary, co-borrower, etc. (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.

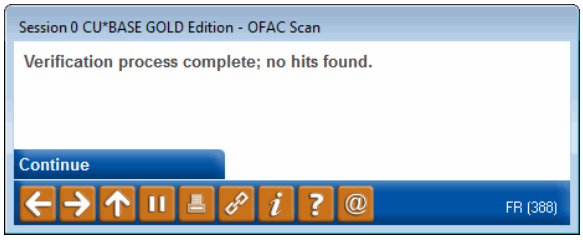
Open/Maintain Memberships/Accounts **(Tool #3)**

If your OFAC report normally scans against a list of countries (see Page 5), check the *Foreign address* flag and enter the address including Country before running the scan.

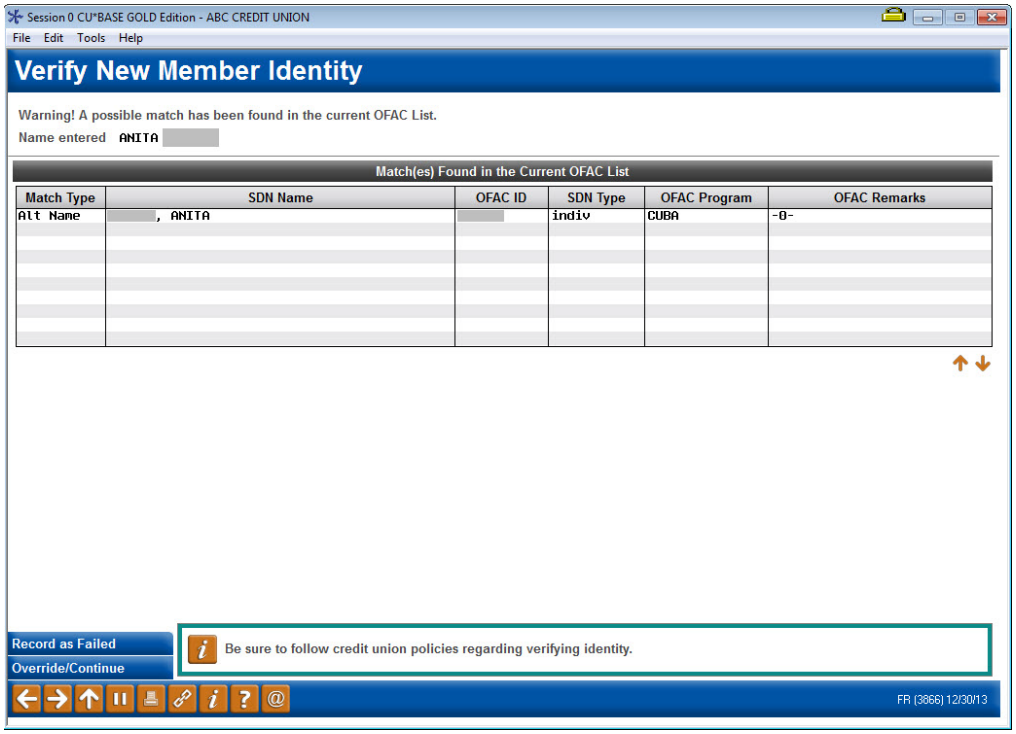


If the OFAC scan has been activated in your workflow controls, after this initial membership information screen has been filled in the system will run the scan automatically when you press Enter (you can also use *OFAC Scan* (F18) in the Timeout window to run the scan at any time).

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

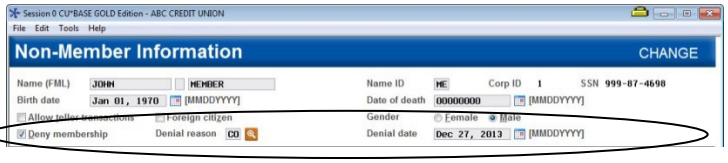


If a suspected match is found, the following screen will appear instead showing all of the matches found:



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

Command Keys

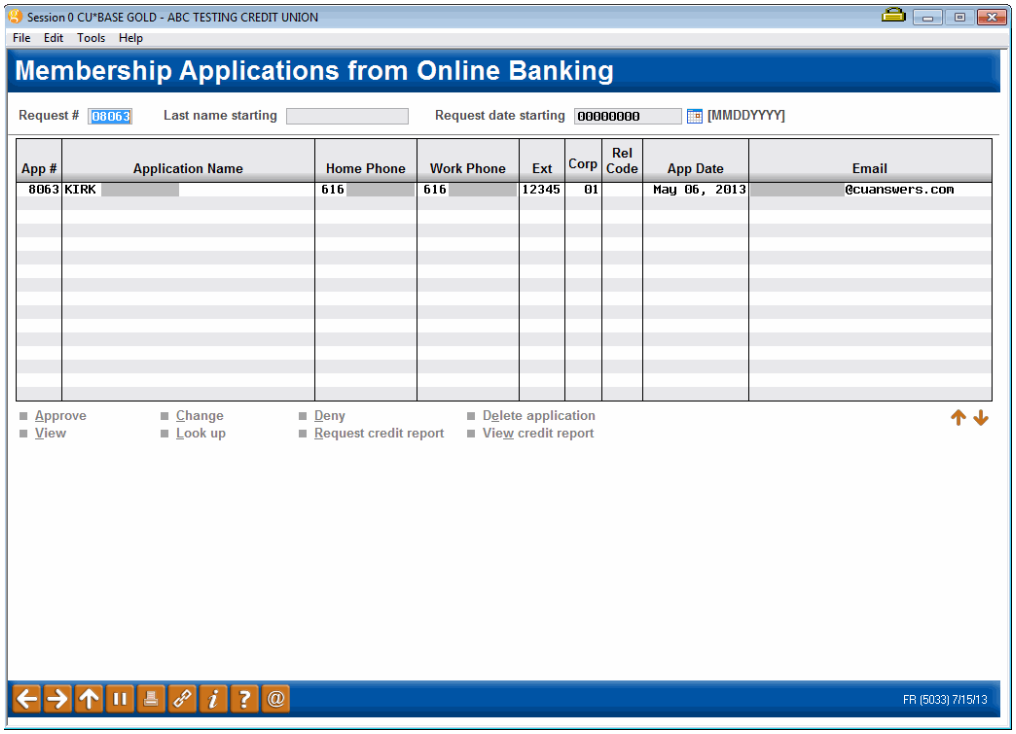
Field Name	*Description*
Denial Notice (F10)	Use this to proceed to the initial "Denied Application Processing" screen to create a denial notice and cancel the membership creation process. The system will automatically create a non-member record. If a membership notice is actually *printed*, CU*BASE will also mark the *Deny membership* flag on the non-member record, along with the Denial Type code used (as the reason for the denial), and the date.  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/organizational-structure/offices/Pages/Office-of-Foreign-Assets-Control.aspx

Work Online Banking Apps/Requests **(Tool #13)**

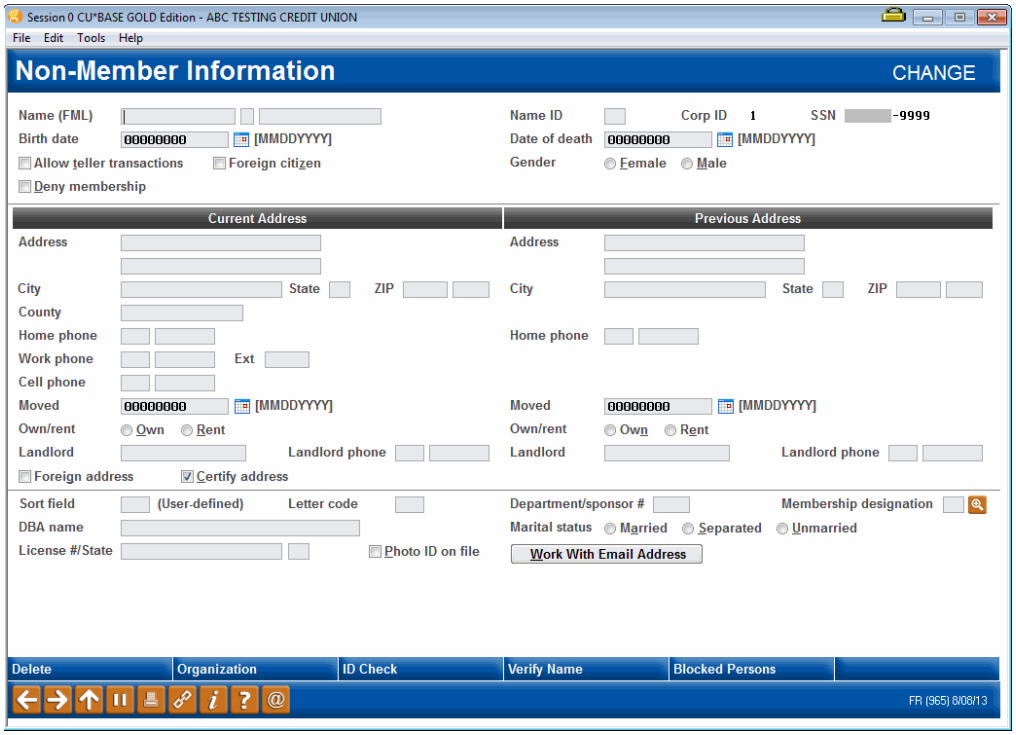


The same OFAC scan will be run automatically when you use the *Approve* option on this screen to approve a membership application.

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.

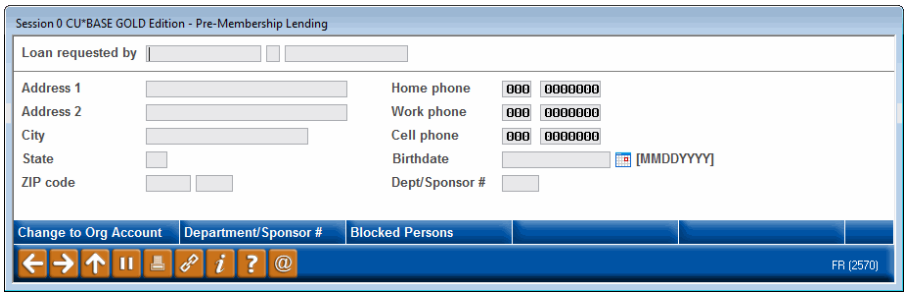
Work with Non-Member Database (Tool #997)



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



Additionally, when non-member information is entered during pre-membership 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

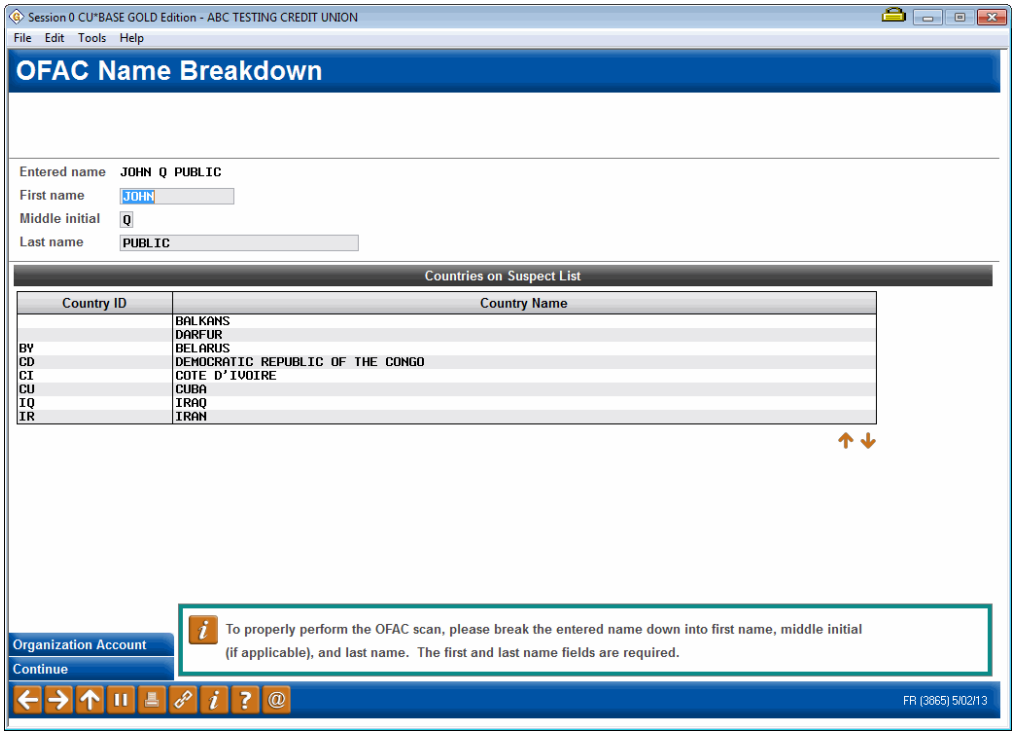
You may however, want a way to run an OFAC scan on any data at any time. A standalone OFAC scan feature can be accessed via two locations: the CU*BASE Time-Out window or via **Tool #778 *Scan a Single Name Through OFAC***. This feature allows you to run a quick OFAC scan on a single item on demand, such 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:

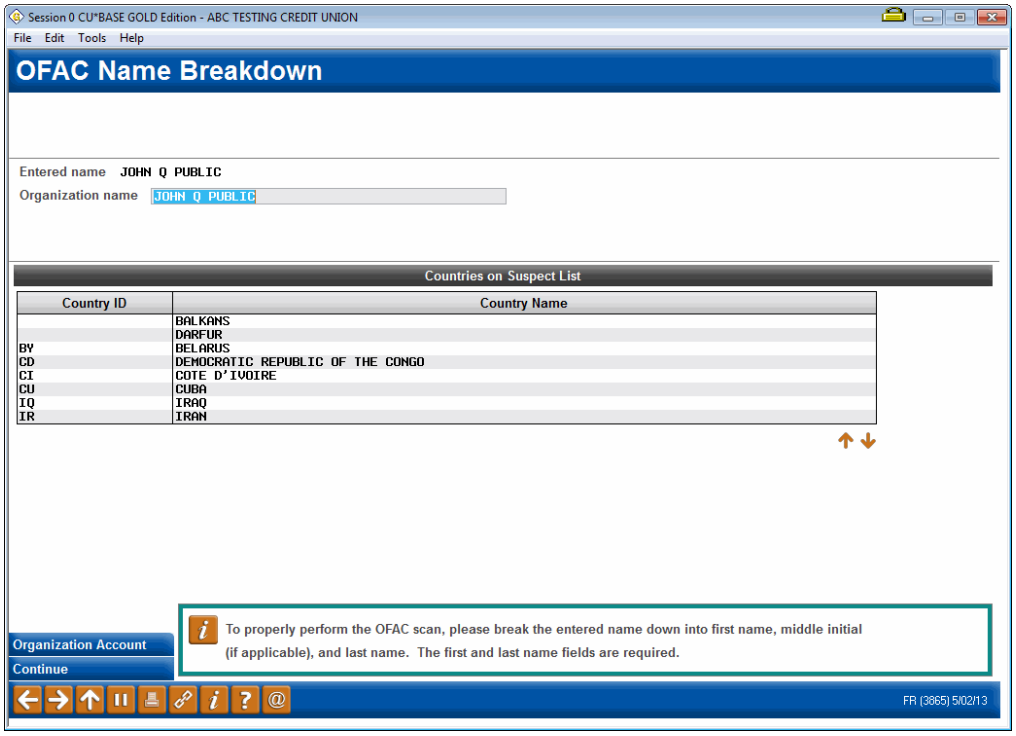
- Accounts Payable Vendors
- Incoming Wires
- Miscellaneous expense checks or A/P checks
- Other miscellaneous names or countries that need to be verified during day-to-day work

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

OFAC Scan – Individual



OFAC Scan - Organizational

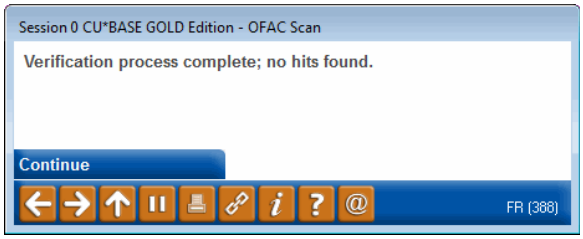


- The window will default to the individual screen. Use *Organization Account* (F9) to move to the Organizational screen.
- You may be asked to enter your Employee ID and password (to be recorded on the Audit Tracker Record – see following section). The Account base (optional) will also be used to record an Audit Tracker.
- NOTE: (Trackers are only recorded for membership accounts – non-members will not receive an Audit Tracker record.)

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

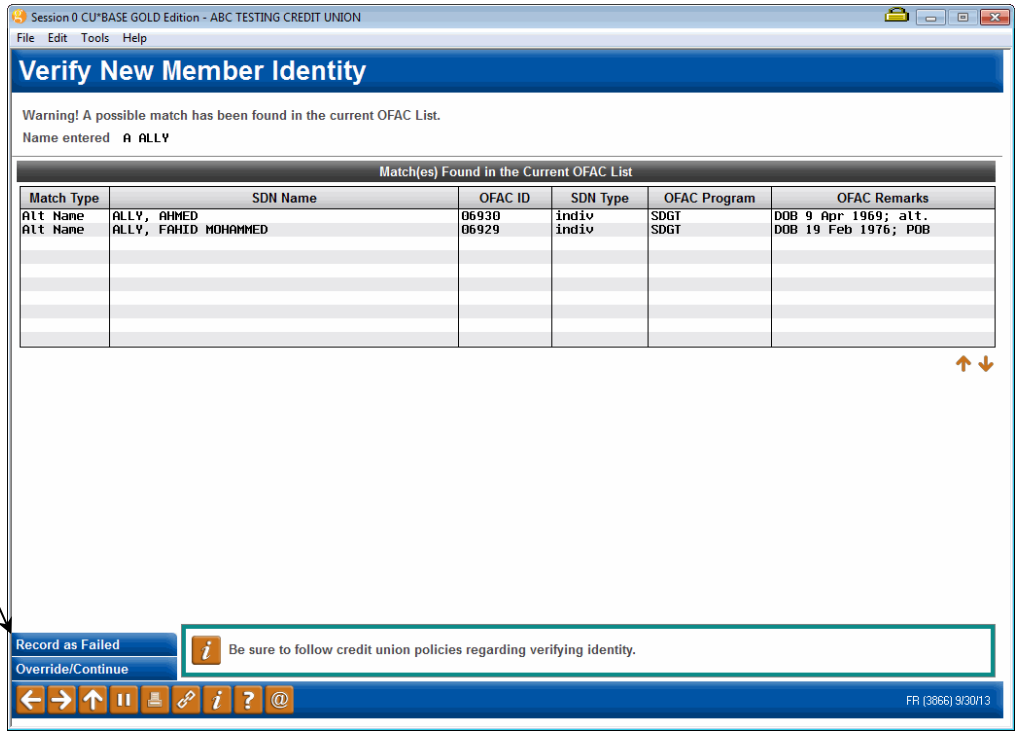
Press Enter to run the scan on the item. The scan will either result in a Pass or Suspect. A Suspect must either be marked as Failed by using *Record as Failed* (F10) or be overridden by using *Override/Continue* (F20).

Successful Scan



Suspect Scan

If the scan results in a "Suspect", you must either use F10-Record as Failed or F20- Override/Continue.



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

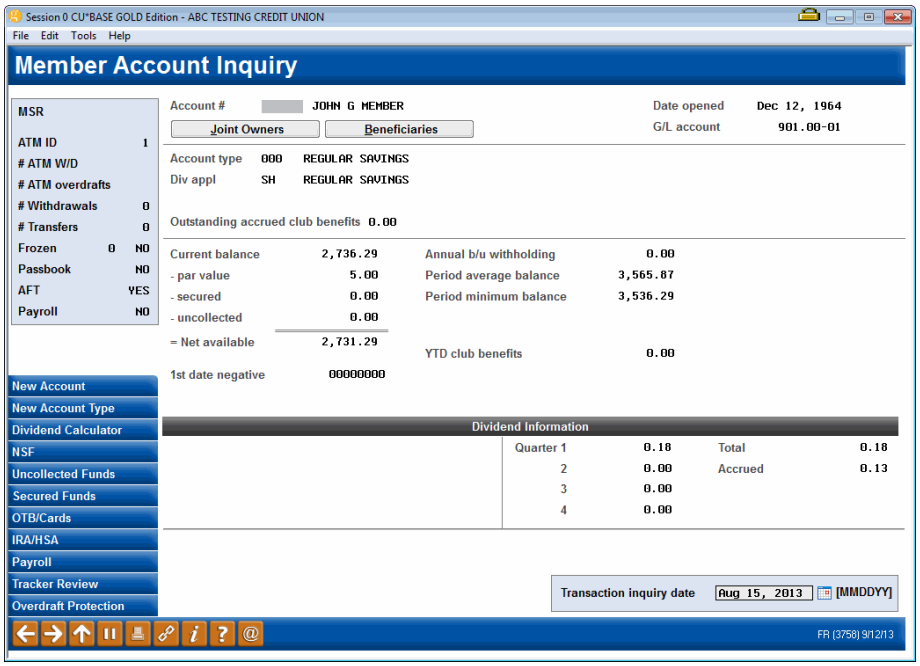
When is an OFAC scan run on a membership that is initiated online? Where can I find a record of the OFAC scan? When is an OFAC scan recorded on the OFAC tracker of the membership?

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.

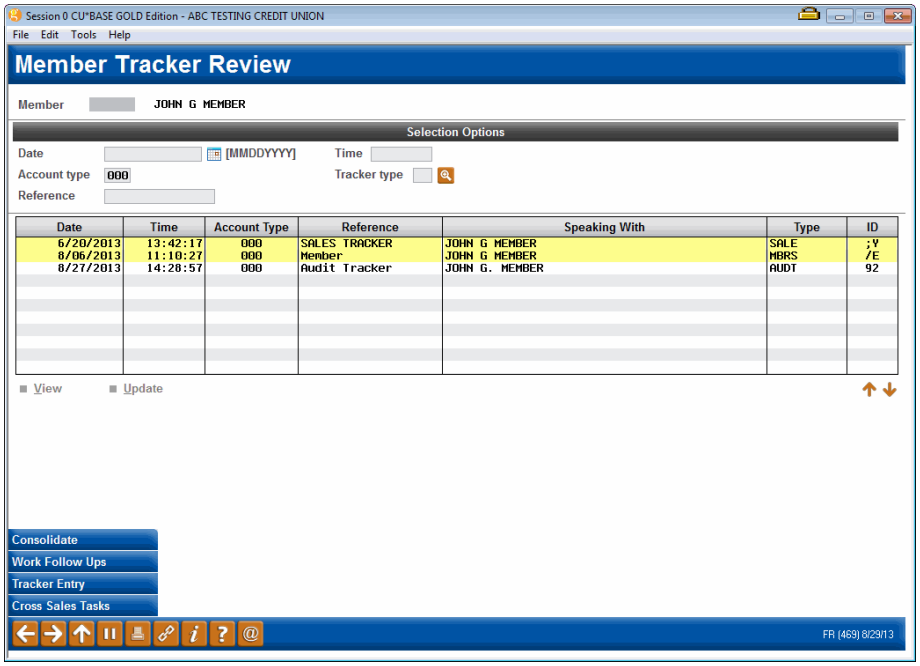
   - NOTE: *If your credit union has made the business decision to hide the base account on this membership*, select another sub account instead at this step. On the Member Tracker Review screen you will see on the next page, enter 000 in the *Account Type* field and press Enter to view the Trackers for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

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



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.

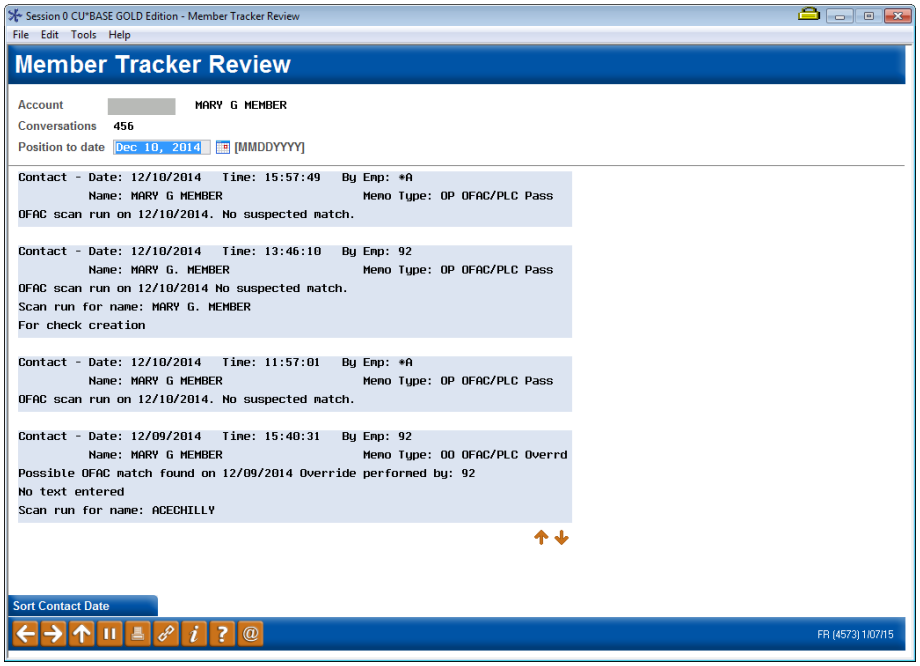
Member Tracker Review (1)



- 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)



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.

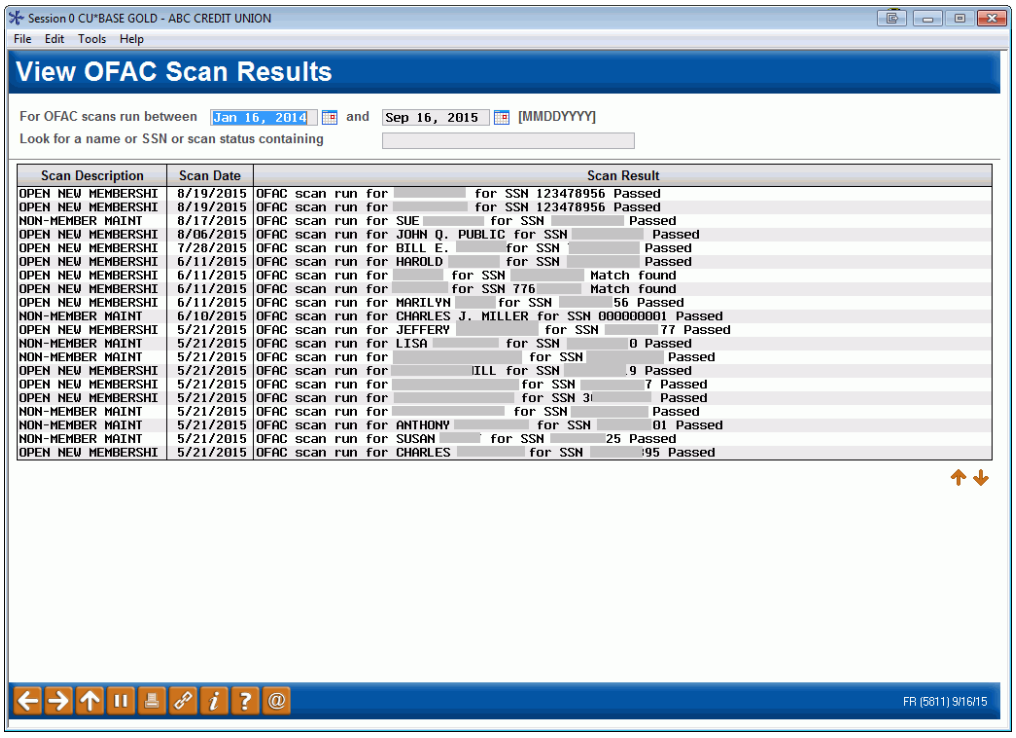
For example, if you enter this in the *Look for a name or SSN or scan status containing* field, you would find failed OFAC scans for John Member or Mary Johnson:

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!

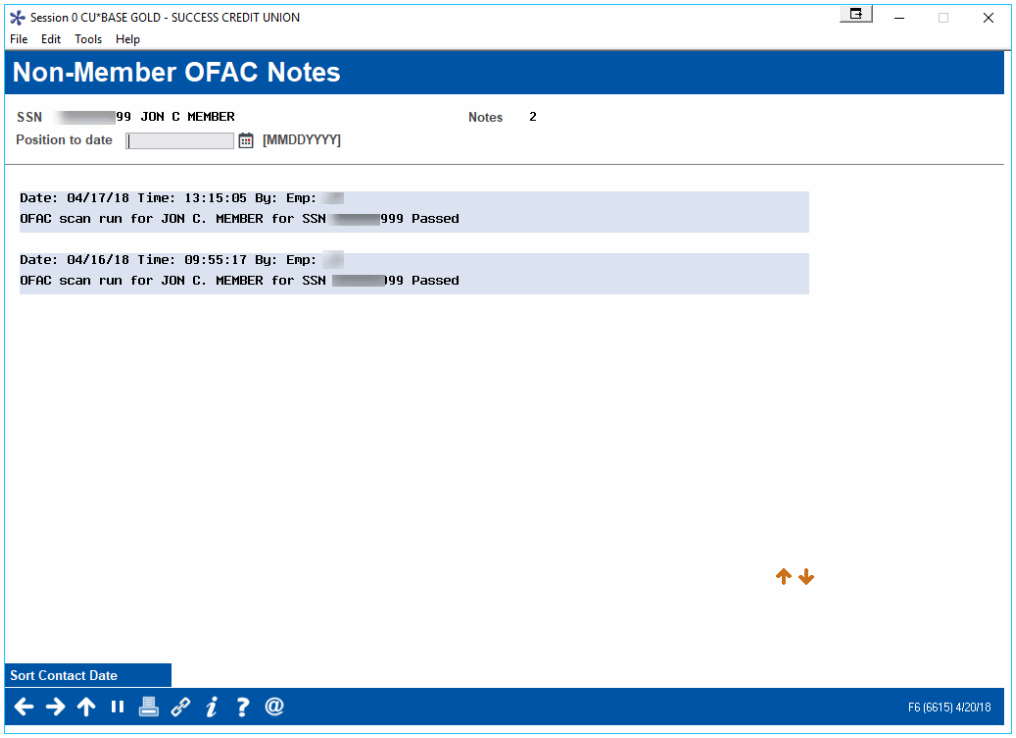
Enter a date range and any filter information and press Enter to view the results.

OFAC Non-Member Scan History **(Tool #559)**



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).



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 Reason OFAC FINCEN	Scan Program Description	Scan Date CCYYMMDD	Scan Time HHMMSS	Scan User	Scan Info
000001	OFAC	SCAN for check creat	20,100,830	140,918	-9	OFAC scan run for DENNIS E. MEMBER for SSN 000000000 Passed
000002	OFAC	OPEN NEW MEMBERSHIP	20,100,903	94,219	-9	OFAC scan run for GERLINDE MEMBER for SSN 111111111 Passed
000004	OFAC	SCAN A SINGLE NAME	20,100,908	91,500	-9	OFAC scan run for MARY M. SMITH for SSN 000000000 Passed
000005	OFAC	OPEN NEW MEMBERSHIP	20,100,908	91,930	-7	OFAC scan run for TESTARCH2 TESTARCH2 for SSN 100000002 Pass
000006	OFAC	SCAN A SINGLE NAME	20,100,908	93,559	-9	OFAC scan run for MARY M. SMITH for SSN 000001234 Passed
000008	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.