



AuditLink

Using the CBX Data Match System for OFAC Compliance

INSIDE THIS GUIDE:

This guide describes using the CBX Data Match system to match your membership records against the current Specially Designated Nationals & Blocked Persons (SDN) list and Consolidated Sanctions list published by the Office of Foreign Asset Control (OFAC), including monthly processing fees for online credit unions.

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Find other Reference Materials page on our website: <https://www.cuanswers.com/resources/doc/cubase-reference/>

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<https://help.cubase.org/cubase/Welcome.htm>

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Table of Contents

Overview	3
When is an OFAC Scan Run?	3
Monthly Fee for the Data Match Service (Online CUs)	3
Pulling Your Own Copy of the OFAC Report	3
Special Note for Self-Processing Credit Unions	4
Downloading the OFAC File	4
Self-Processor Running Batch Scan On Demand	4
Running the Data Match Report.....	4
What is Matched During the Batch Scan?.....	4
Automated Run of the OFAC Scan	5
Report Sample	5
Activating Automatic OFAC Scans of New Memberships	6
Opening Membership in CBX.....	8
Approving Online Banking Membership Application	10
Creating/Modifying Non-Member Record	10
Pre-Membership Lending.....	11
Additional Items with Automatic Scans	11
Indirect Third-Party Loan Applications	12
Running an OFAC Scan On Demand	12
Tracking OFAC Scans	15
Audit Tracker Records Scans on Memberships.....	15
Audit Memberships Initiated Online.....	15
Reviewing a Tracker at a Later Date.....	15
Auditing OFAC Scans on Non-Members	17
Easily View a Single Non-Member's OFAC Scan from Commonly Used Non-Member Screens	18

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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 Workflow controls (**Tool #1004**), 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 6.
- 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 11.
- A manual OFAC scan can be run on any item at any time using the stand alone OFAC scan. See page 12.
- When a loan application comes into the loan queue from an indirect third-party loan queue, certain items are run through OFAC. See page 12.

After the report is printed, evaluate each reported match carefully, noting any “false positives.” For any valid matches, follow OFAC guidelines available at <https://ofac.treasury.gov/about-ofac> 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 6) 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 CBX 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:

<https://sanctionslist.ofac.treas.gov/Home/SdnList>

Consolidated Sanctions List:

<https://sanctionslist.ofac.treas.gov/Home/ConsolidatedList>

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 website. 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 CBX Data Match System](#), for complete instructions on downloading the current OFAC lists from the website 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

The OFAC data match scan automatically runs on all members, non-members, and A2A recipients weekly (thanks to the CU*Answers Operations team!). You may also choose to activate automatic OFAC scans prior to creating a new membership/non-member record. The OFAC data match scan can also be run on demand for a single name via the CBX Time-Out window or via **Tool #778 Scan a Single Name Through OFAC**.

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 website. 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 (BTDAT 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. 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 the Report Sample section below).

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 match, it is up to your credit union to review the items on the list and decide whether it is a true match or not. See the report sample on page 5 below 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 the LOFAC 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.

Data Match: Statement of Matched Records (LOFAC)

6/07/25 5:01.23	CREDIT UNION	LOFAC	PAGE 1
RUN ON 6/07/25	DATA MATCH: STATEMENT OF MATCHED RECORDS		
List Downloaded From OFAC: 06/07/25			
***** CU*BASE FILES ***** OFAC FILE *****			
File Name - MASTER			
ACCT	MATCH	OFAC	
BASE NAME	TYPE SDN NAME	ID SDN TYPE OFAC PROGRAM	OFAC REMARKS

File Name - MSNONMBR			
ACCT	MATCH	OFAC	
BASE NAME	TYPE SDN NAME	ID SDN TYPE OFAC PROGRAM	OFAC REMARKS

HUSSEIN	NAME	AL-AWADI, HUSSEIN QAID	individual SDN: IRAQ2 nationality Iraq
Expanded Remarks: nationality Iraq; Former Ba'th party regional command chairman, Ninawa,.			
HUSSEIN	NAME	AL-NASSER, ABDELKARIM HU	individual SDN: SDGT POB Al Ihsa, Sau
Expanded Remarks: POB Al Ihsa, Saudi Arabia; citizen Saudi Arabia; Secondary sanctions risk: section 1(b) of Executive			
HUSSEIN	PLC NAME	AL-HUSSEINI, WAEL	individual NS: NS-PLC DOB 1962; HAMAS
Expanded Remarks: DOB 1962; HAMAS - Jerusalem.			
ABDUL	Alt Name	ABDULMALIK, ABDUL HAMEED	individual SDN: IRAQ2 -0-
MAY	Alt Name	MAYGU INTERNATIONAL TRAD	-0- SDN: IRAN-E013902 Organization Est
Expanded Remarks: Organization Established Date 29 Jun 2020; Company Number 2955367 (Hong Kong); Business Registration			

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 (see 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: <https://ofac.treasury.gov/about-ofac>

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 base.

- NOTE: This section is used to describe how to automate the running of an OFAC scan while a membership is manually added to CBX. 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 CBX during that membership opening process.

NOTE: Unlike the manually run batch scan (page 4), 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 automated new membership OFAC scans 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 6 for screenshots of this type of scan.)

Workflow Controls for Opening Membership (Tool #1004)

The screenshot displays the 'Workflow Controls for Opening Memberships' configuration interface. On the left, there are buttons for 'Save' and 'Copy to All Branches'. The main area shows configuration for 'ABC CREDIT UNION' at the 'ABC CREDIT UNION MAIN BRANCH'. Under 'Defaults for Workflow', the 'OFAC scan' checkbox is checked and highlighted with a red box. Other checked options include 'Credit report', 'Check blocked persons file', 'Joint owner/misc./beneficiary setup', 'Open sub-accounts', 'E-statement enrollment', 'Marketing clubs', 'ATM/Debit card maintenance', 'ARU/Online banking setup', 'Email address reminder', and 'Photo ID reminder'. There are also sections for 'Required Fields' and 'Reg E opt in/out functionality'.

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 3 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.

If activated, scans will be run automatically:

- When a credit union employee opens a new membership in CBX (see page 8).
- When approving a membership application submitted through online banking (see page 10).
- When creating or modifying a non-member record for any reason, such as a joint owner, misc. owner, beneficiary, co-borrower, etc. (see page 10).
- During pre-membership lending when non-member information is entered while determining if a member qualifies for a loan (see page 11).
- When a loan application comes in via indirect third-party (see page 12).
- When a membership is approved that is initiated via the Online Membership Application.

Tracking of these scans is covered in the *Tracking OFAC Scans* section of this booklet.

Opening Membership in CBX

Open New Membership (Tool #3)

Open New Membership

Blocked Persons >
More Contact #s >
Credit Report >
Custom Fields >

Account base Date opened Jun 11, 2025
Branch # 01 ABC CREDIT UNION MAIN BRANCH
Designation MI Individual ☒ Secondary names (joint/misc./beneficiaries)

Required Information

Name NEW MEMBER SSN
Name ID NM Gender ☐ Male ☐ Female ☐ Other ☒ Foreign address ☐ Foreign citizen
Birth date Jan 01, 1990
DBA name Home type ☐ Own ☐ Rent ☒ N/A
Street 123 HOME ST
City/Code FOREIGN CITY
Country FOREIGN COUNTRY
Date moved to MMDDYYYY ☒ Certify address

- If your OFAC report normally scans against a list of countries (see page 4), 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 use Enter (you can also use **OFAC Scan** 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.

OFAC Scan (Tool #3)

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

Verify New Member Identity (Tool #3)

The data on this screen is the same as that shown on the OFAC report shown on page 5.

Field Name	Description
Record as Failed	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>, CBX 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. Name (FML) ☐ ☒ Name ID PP Corp ID 01 SSN Birth date Jul 27, 2023 Date of death 00000000 ☐ Allow teller transactions ☐ Foreign citizen Gender ☐ Female ☐ Male ☒ Other ☒ Deny membership Denial reason A Denial date Jun 11, 2025 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	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 website: **Error! Hyperlink reference not valid. <https://ofac.treasury.gov/about-ofac>**

Approving Online Banking Membership Application

Tool #13 Work Online Banking Apps/Requests

App #	Application Name	Home Phone	Corp	Rel Code	App Date	Email	Reference	Other Information
86754			01		11/30/2024	@GMAIL.COM		MAP/MOP Application

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 9 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.

Creating/Modifying Non-Member Record

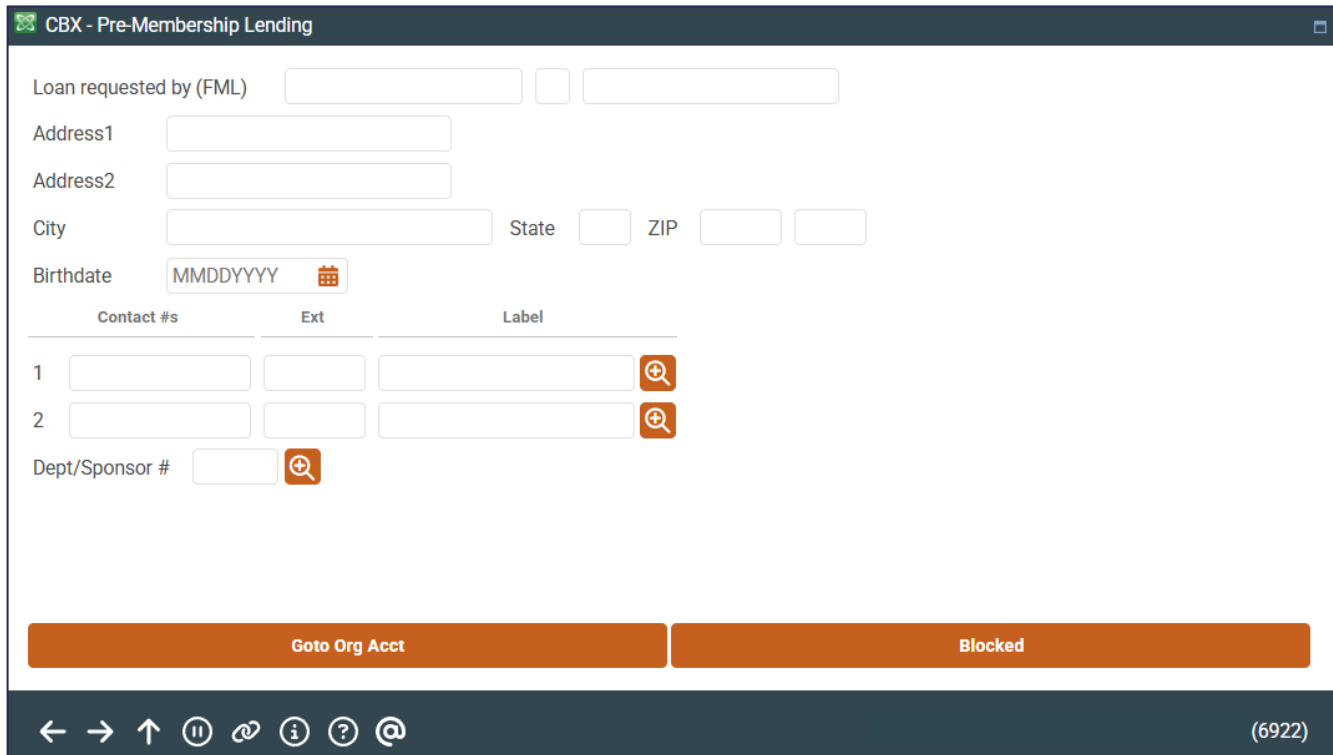
Tool #997 Work With Non-Member Database

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 CBX 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 icon next to the name (or **Verify Name**). If a match is found, the Verify New Member Identity information screen shown on page 9 will appear.

Pre-Membership Lending

Pre-Membership Lending (Tool #2 > Pre-Membership Lending)



CBX - Pre-Membership Lending

Loan requested by (FML) ☐

Address1

Address2

City State ZIP

Birthdate 

	Contact #s	Ext	Label	
1				
2				

Dept/Sponsor # 

Goto Org Acct **Blocked**

← → ↑ ⏸ 🔗 ⓘ ? @ (6922)

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 actions 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 online help for more information about handling 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 the Running an OFAC Scan On Demand 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 CBX 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

Tool #778 Scan a Single Name Through OFAC

 **OFAC Name Breakdown**

[Continue](#)

[Organization Account](#)

Account base (A tracker will be created if an account is entered.)

First name

Middle initial

Last name

Countries on Suspect List

Country ID	Country Name
	CRIMEA
	DARFUR
BY	BELARUS
CD	DEMOCRATIC REPUBLIC OF THE CONGO
CI	COTE D'IVOIRE
CU	CUBA
IQ	IRAQ
IR	IRAN

Tool #778 Scan a Single Name Through OFAC > Organization Account

 **OFAC Name Breakdown**

[Continue](#)

[Individual Account](#)

Account base (A tracker will be created if an account is entered.)

Organization name

Countries on Suspect List

Country ID	Country Name
	CRIMEA
	DARFUR
BY	BELARUS
CD	DEMOCRATIC REPUBLIC OF THE CONGO
CI	COTE D'IVOIRE
CU	CUBA
IQ	IRAQ
IR	IRAN

- The window will default to the individual screen. Use **Organization Account** 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** to enter an organization name.

Use 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** or be overridden by using **Override/Continue**.

OFAC Scan (Tool #778 – No hits)

The screenshot shows a window titled "- OFAC Scan". The main text area displays "Verification process complete; no hits found." Below this text is a large orange button labeled "Continue". At the bottom of the window is a dark blue navigation bar containing several icons (back, forward, up, down, search, etc.) and a page number "(388)" on the right.

Verify New Member Identity (Tool #778 – Suspect)

The screenshot shows a window titled "Verify New Member Identity". On the left is a sidebar with two buttons: "Record as Failed" and "Override/Continue". The main area displays a warning: "Warning! A possible match has been found in the current OFAC List." Below the warning, the "Name entered" is "JOSE ANTONIO TORRES". A table titled "Match(es) Found in the Current OFAC List" shows a match for "TORRES, JOSE ANTONIO" from "VENEZUELA". The table has columns for Match Type, SDN Name, OFAC ID, SDN Type, OFAC Program, and OFAC Remarks. At the bottom of the main area is a dark blue bar with a warning icon and the text "Be sure to follow credit union policies regarding verifying identity."

Match Type	SDN Name	OFAC ID	SDN Type	OFAC Program	OFAC Remarks
COUNTRY	TORRES, JOSE ANTONIO			VENEZUELA	

- If the scan results in a Suspected match, you must either use **Record as Failed** or **Override/Continue**.

To override a Suspect scan, use **Override/Continue**.

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 OFAC Scans

CBX will automatically add an Audit Tracker conversation to the member's Audit Tracker each time an OFAC scan is run on their membership (or item connected to their membership (such as an A2A)). OFAC scans run on non-members are also saved in various places for tracking.

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 their 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 **Record as Failed** 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/Continue** 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 a membership 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) and a message reading, "OFAC scan was run on mm/dd/yyyy. Possible match found." If a member passed the scan, they receive a new conversation appended to their 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

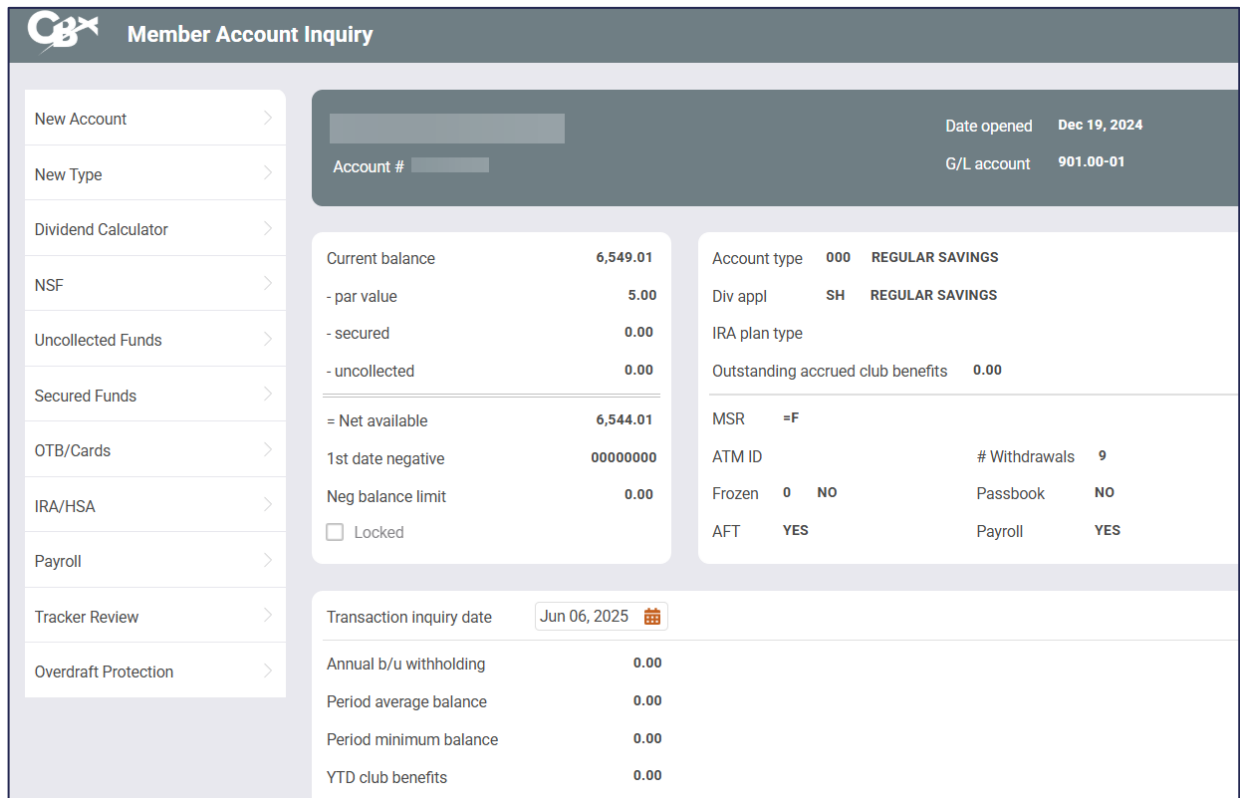
[When is an OFAC scan run on a membership that is initiated online? Where can I find a record of the OFAC scan? When is an OFAC scan recorded on the OFAC tracker of the membership?](#)

Reviewing a Tracker at a Later Date

1. Later if you want to review a member's account you simply review their Audit Tracker. You can access member trackers through Inquiry or Phone Inquiry. Select the member's base account and use **Tracker Review** 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 use Enter to view the Trackers for the membership.

Member Account Inquiry



Member Account Inquiry

New Account >
New Type >
Dividend Calculator >
NSF >
Uncollected Funds >
Secured Funds >
OTB/Cards >
IRA/HSA >
Payroll >
Tracker Review >
Overdraft Protection >

Account # [REDACTED] Date opened Dec 19, 2024
G/L account 901.00-01

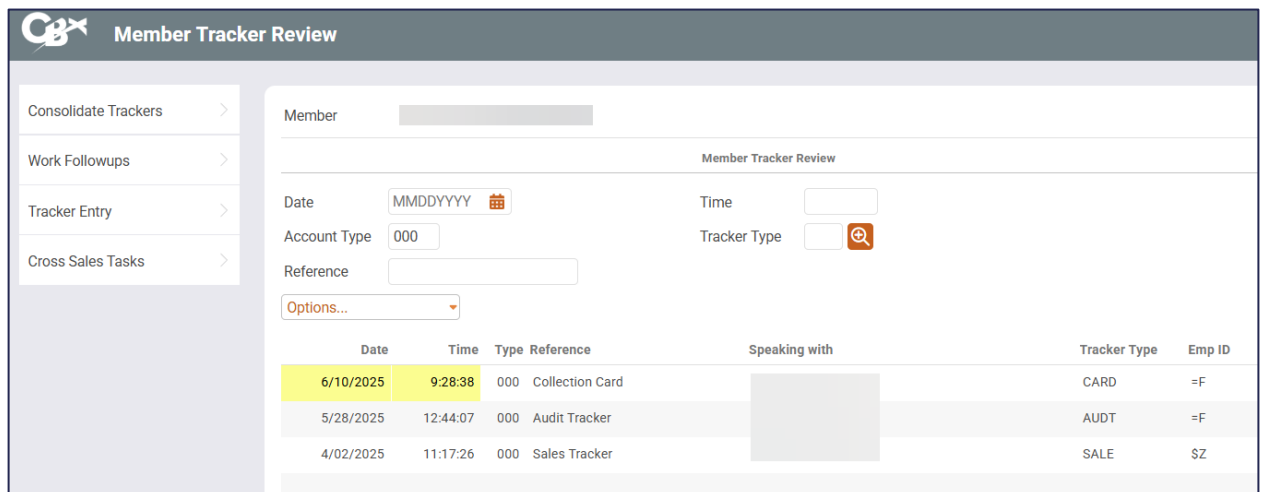
Current balance	6,549.01	Account type	000 REGULAR SAVINGS
- par value	5.00	Div appl	SH REGULAR SAVINGS
- secured	0.00	IRA plan type	
- uncollected	0.00	Outstanding accrued club benefits	0.00
= Net available	6,544.01	MSR	=F
1st date negative	00000000	ATM ID	# Withdrawals 9
Neg balance limit	0.00	Frozen	0 NO
☐ Locked		AFT	YES
		Payroll	YES

Transaction inquiry date Jun 06, 2025

Annual b/u withholding	0.00
Period average balance	0.00
Period minimum balance	0.00
YTD club benefits	0.00

- 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 (Inquiry > Tracker Review)



Member Tracker Review

Consolidate Trackers >
Work Followups >
Tracker Entry >
Cross Sales Tasks >

Member [REDACTED]

Member Tracker Review

Date MMDDYYYY Time
Account Type 000 Tracker Type
Reference
Options...

Date	Time	Type	Reference	Speaking with	Tracker Type	Emp ID
6/10/2025	9:28:38	000	Collection Card	[REDACTED]	CARD	=F
5/28/2025	12:44:07	000	Audit Tracker	[REDACTED]	AUDT	=F
4/02/2025	11:17:26	000	Sales Tracker	[REDACTED]	SALE	SZ

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 use Enter to view the Trackers for the membership.

- 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 (Inquiry > Tracker Review > View)

 Member Tracker Review

Sort Contact Date

Account

Conversations 15

Position to date 

Contact - Date: 04/01/2025 Time: 15:45:24 By Emp: =F

Name: Memo Type: OP OFAC/PLC Pass

OFAC scan run on 04/01/2025 No suspected match.

Scan run for A2A transfer Account holder:

Contact - Date: 04/01/2025 Time: 15:45:22 By Emp: =F

Name: Memo Type: OP OFAC/PLC Pass

OFAC scan run on 04/01/2025 No suspected match.

Scan run for A2A transfer Institution: CU

Contact - Date: 03/31/2025 Time: 14:40:35 By Emp: =F

Name: Memo Type: OP OFAC/PLC Pass

OFAC scan run on 03/31/2025 No suspected match.

Scan run for A2A transfer Account holder:

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, 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

- 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 use Enter to view the results.

View OFAC Scan Results (Tool #559)


View OFAC Scan Results

For OFAC scans run between and

Look for a name or SSN or scan status containing

Scan Description	Scan Date	Scan Result
SCAN A SINGLE NAME	6/11/2025	OFAC scan run for [redacted] for SSN [redacted] Passed
NON-MEMBER MAINT	6/11/2025	OFAC scan run for [redacted] for SSN [redacted] Match found
NON-MEMBER MAINT	6/11/2025	OFAC scan run for [redacted] for SSN [redacted] Passed
OPEN NEW MEMBERSHI	6/11/2025	OFAC scan run for [redacted] for SSN [redacted] Match found
OPEN NEW MEMBERSHI	6/11/2025	OFAC scan run for [redacted] for SSN [redacted] Match found
OPEN NEW MEMBERSHI	6/11/2025	OFAC scan run for [redacted] for SSN [redacted] Match found
OPEN NEW MEMBERSHI	6/11/2025	OFAC scan run for [redacted] for SSN [redacted] Match found
OPEN NEW MEMBERSHI	6/11/2025	OFAC scan run for [redacted] for SSN [redacted] Passed

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**).

Tool #997 > Non-Member Notes > OFAC Notes


Non-Member OFAC Notes

Sort Contact Date

SSN
 Notes **4**

Position to date

Date: 06/11/25 Time: 11:17:31 By: Emp: =F

OFAC scan run for [redacted] for SSN [redacted] Passed

Date: 05/23/25 Time: 11:01:40 By: Emp: =F

OFAC scan run for [redacted] for SSN [redacted] Passed

OFAC scan run for [redacted] for SSN [redacted] Passed

OFAC scan run for [redacted] for SSN [redacted] Passed

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

This dashboard is based on the CBX 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	Scan
Reason	Program	Date	Time	User	Info
OFAC FINCEN	Description	CCYYMMDD	HHMMSS		
000001 OFAC	NON-MEMBER MAINT	20,210,901	80,013	81	OFAC scan run for JASON [REDACTED] for SSN [REDACTED] Passed
000002 OFAC	OPEN NEW MEMBERSHIP	20,210,901	81,555	AO	OFAC scan run for SHAWN [REDACTED] for SSN [REDACTED] Passed
000003 OFAC	SCAN for check creat	20,210,901	84,241	ER	OFAC scan run for [REDACTED] for SSN [REDACTED] Passed
000004 OFAC	NON-MEMBER MAINT	20,210,901	84,944	LK	OFAC scan run for SUSAN [REDACTED] for SSN [REDACTED] 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.