
Running a FinCEN 314(a) Scan Against Your CU*BASE Database

INTRODUCTION

Auditors will love the time they are saved by using the on demand manual FinCEN scan, built directly into CU*BASE. By using #12- Run FinCEN (314a) Scan on the Auditing menu (MNAUDT), they can quickly run the credit union membership against the FinCEN files downloaded from the FinCEN website. The scan will review open (MASTER) and closed (MSHIST) membership files, as well as non-member (MSNONMBR) files and provide a printed report for reporting on the FinCEN website. This printed report will only list records where several key fields match the FinCEN file. If a match is made, the report will also list all other fields for this record, and whether these fields resulted in a match (or not). Asterisks will appear next to non-matching fields, further assisting the auditor in recognizing false positives.

Interested in using this feature? Contact a Client Services Representative to request upload privileges for your auditor. This individual will use the existing upload process available on the File Transfer /Audit Function menu (MNFILE) to upload the FinCEN files to the iSeries.

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REQUESTING ACCESS



*The following procedures should be followed only after you have contacted CU*Answers to set up “upload” privileges for the member of your team who will upload the FinCEN file to the iSeries. Contact a Client Services Representative for assistance.*

Once you have received the Upload/Download request form from a Client Services Representative, be sure to fill out the Section 4 as shown below, in addition to the other required information.

Section 4 – Authorized User IDs for file Downloads/Uploads

 Authorized iSeries User IDs for file Downloads should be changed as follows:

Request for what type of download?

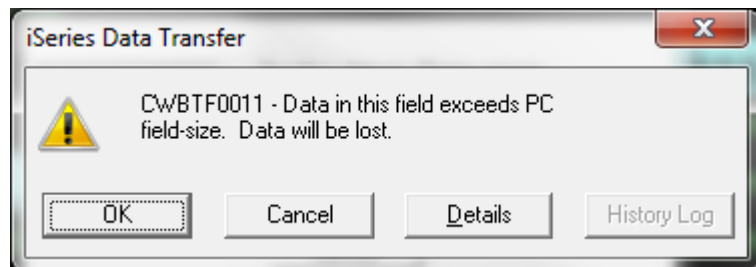
User IDs	Employee Name	Add/ Delete	Download/ Upload	QUERYXX	FILEXX (Specify Files)	FILE NAME
JohnE200	John Employee	Add	Upload	FCPERSON, FCBUSINESS		

PROCEDURES FOR PREPARING FILES

DOWNLOAD FILES FROM THE FINCEN WEBSITE

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

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



PREPARATION: FIRST TIME AT CREDIT UNION ONLY

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

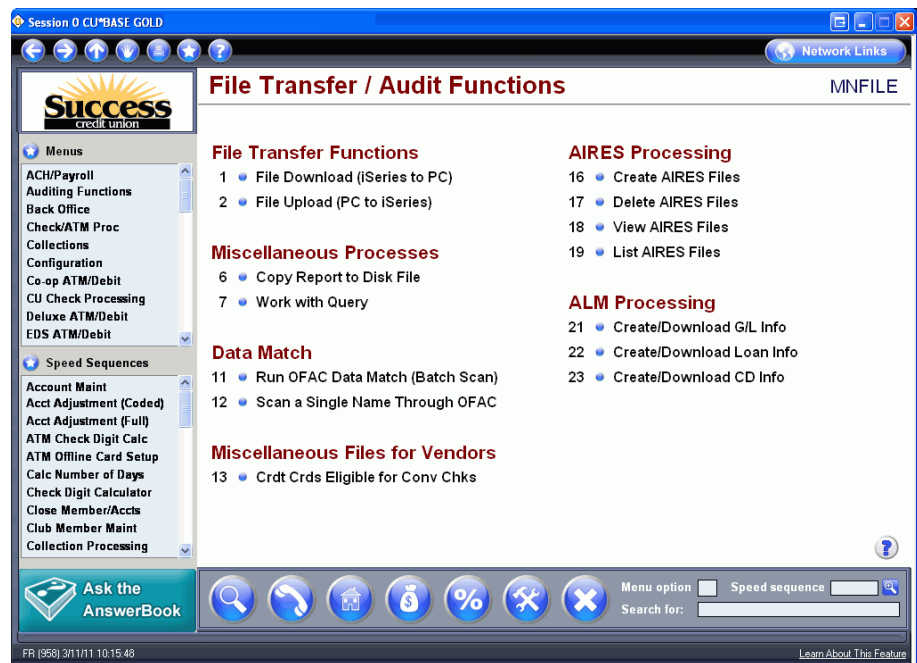
1. Access menu option #12 (Run FinCEN 314(a) Scan) on the Auditing menu (MNAUDT).
2. Click Cancel.

UPLOAD FILES TO ISERIES

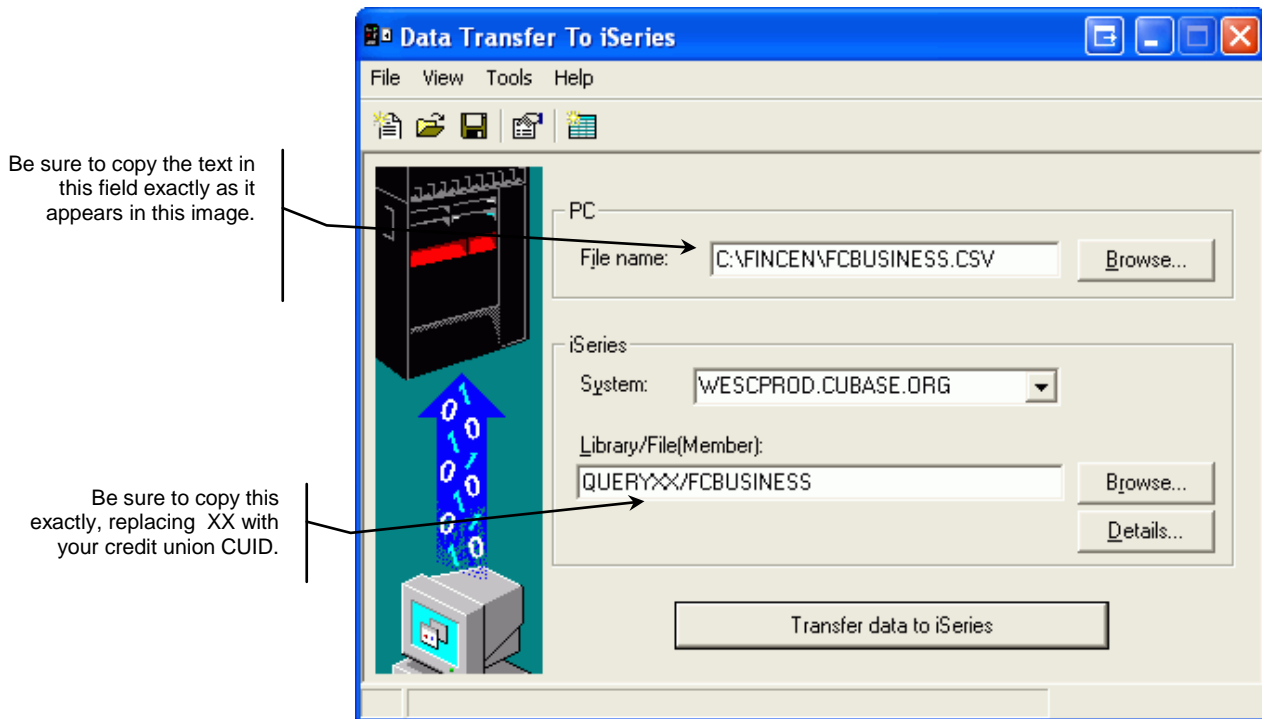
Once you have saved the files to your C:\ drive, you may upload them to the iSeries.

NOTE: Once the FinCEN scan is run (see page 12), the FCPERSON and FCBUSINESS files on the iSeries will be cleared. The files on your local C:\ drive will not be cleared, however. If you need to run the scan a second time, follow the following directions to upload the files a second time. (Both FCBUSINESS and FCPERSON will need to be uploaded.)

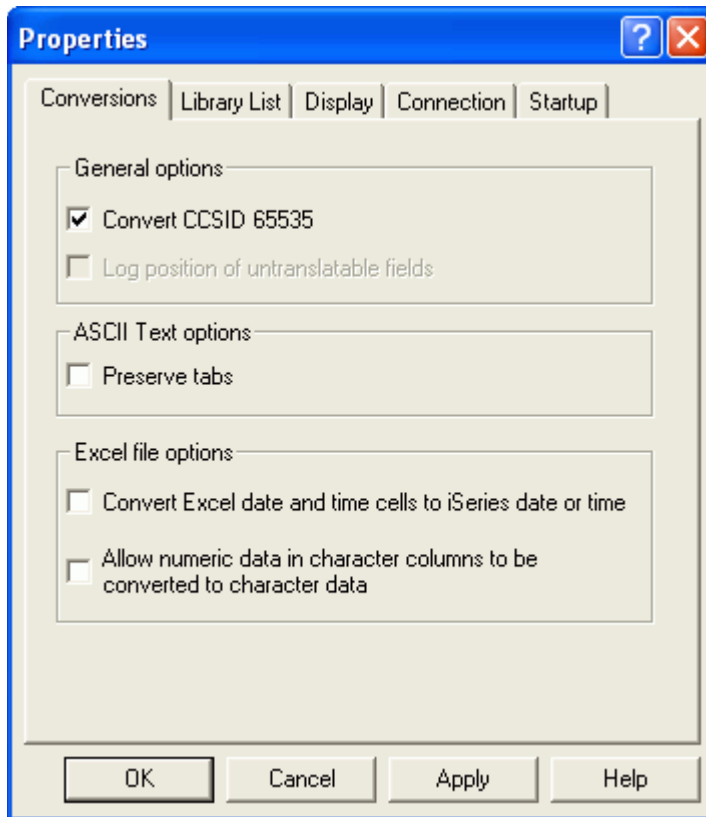
- **IMPORTANT:** It is critical that you enter the data on the screens exactly as it appears in the screens in this section.



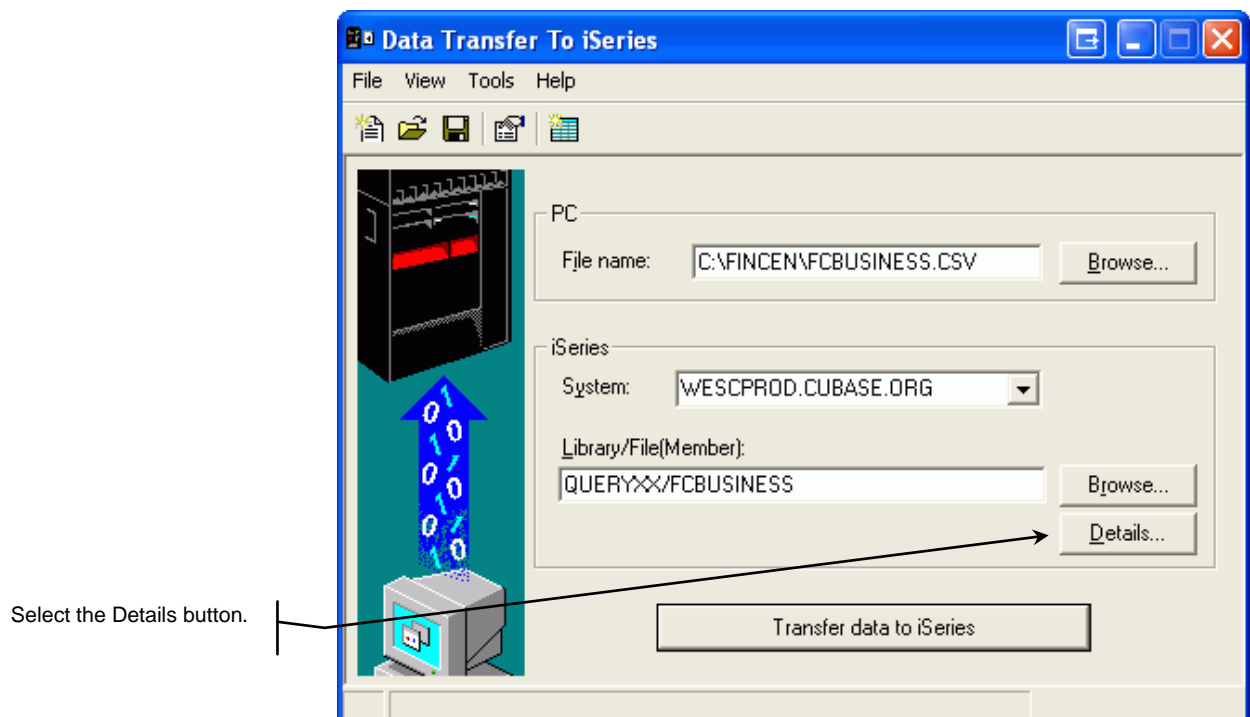
1. From the MNFILE menu, select #2-File Upload (PC to iSeries)



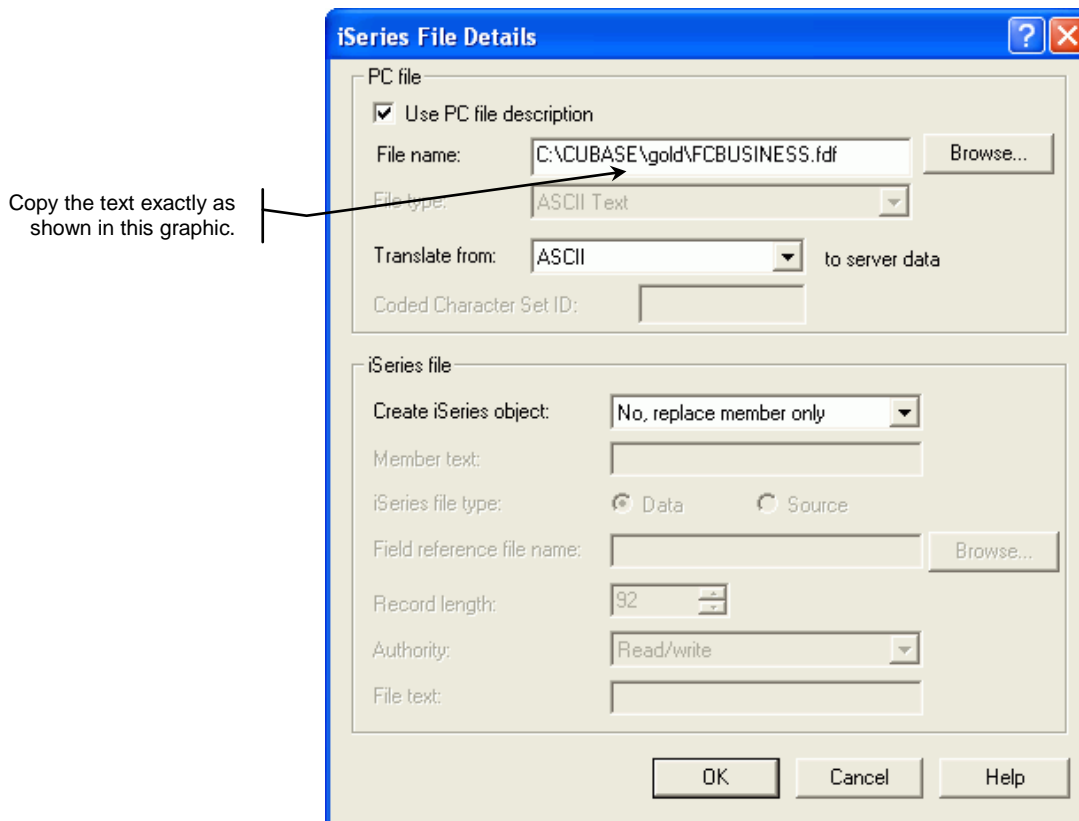
2. First upload the FCBUSINESS file to the iSeries. Fill in the screen exactly as above.
3. Then select File | Properties from the previous screen to view the screen below.



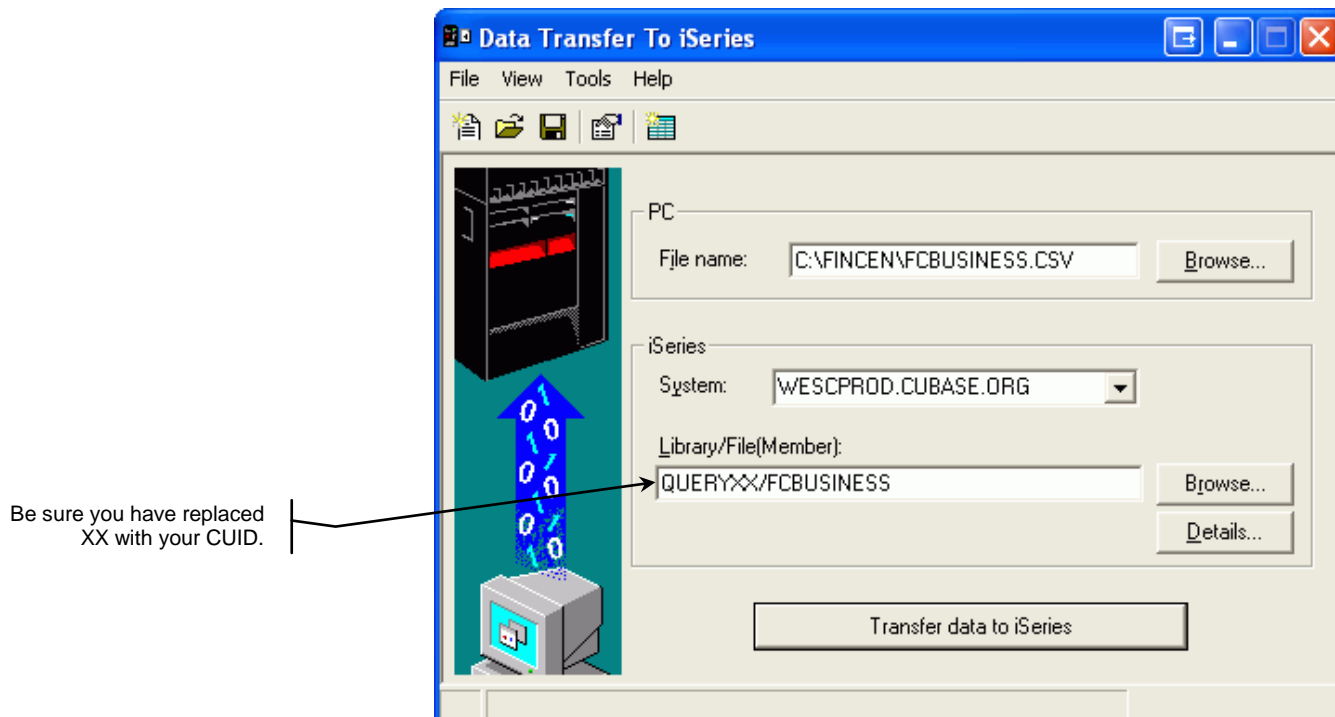
4. Check the "Convert CCSID..." checkbox. Then click the Apply and OK buttons.



5. Click the Details button.

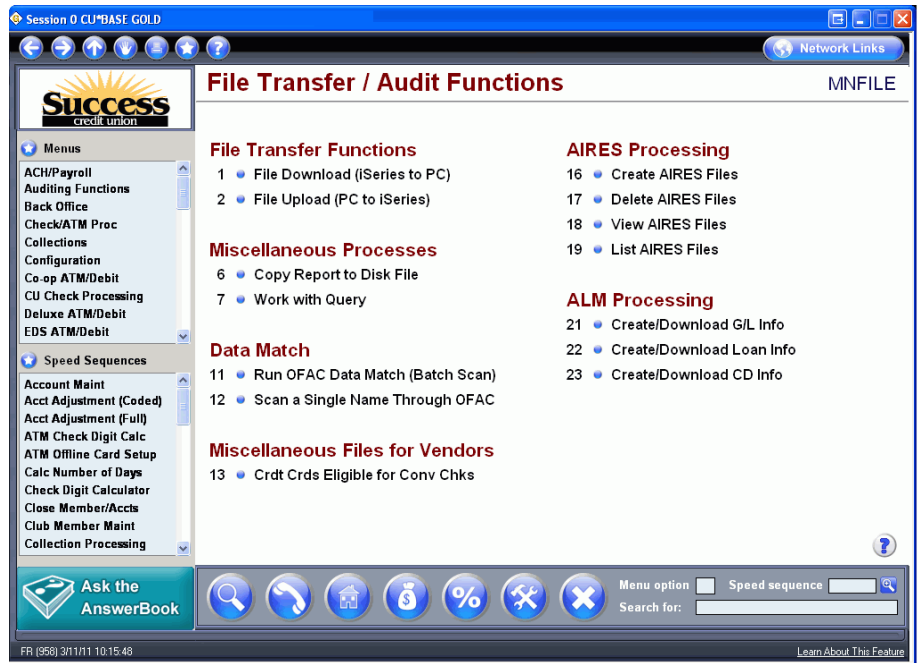


6. Confirm the screen is filled in as shown above. Click OK.

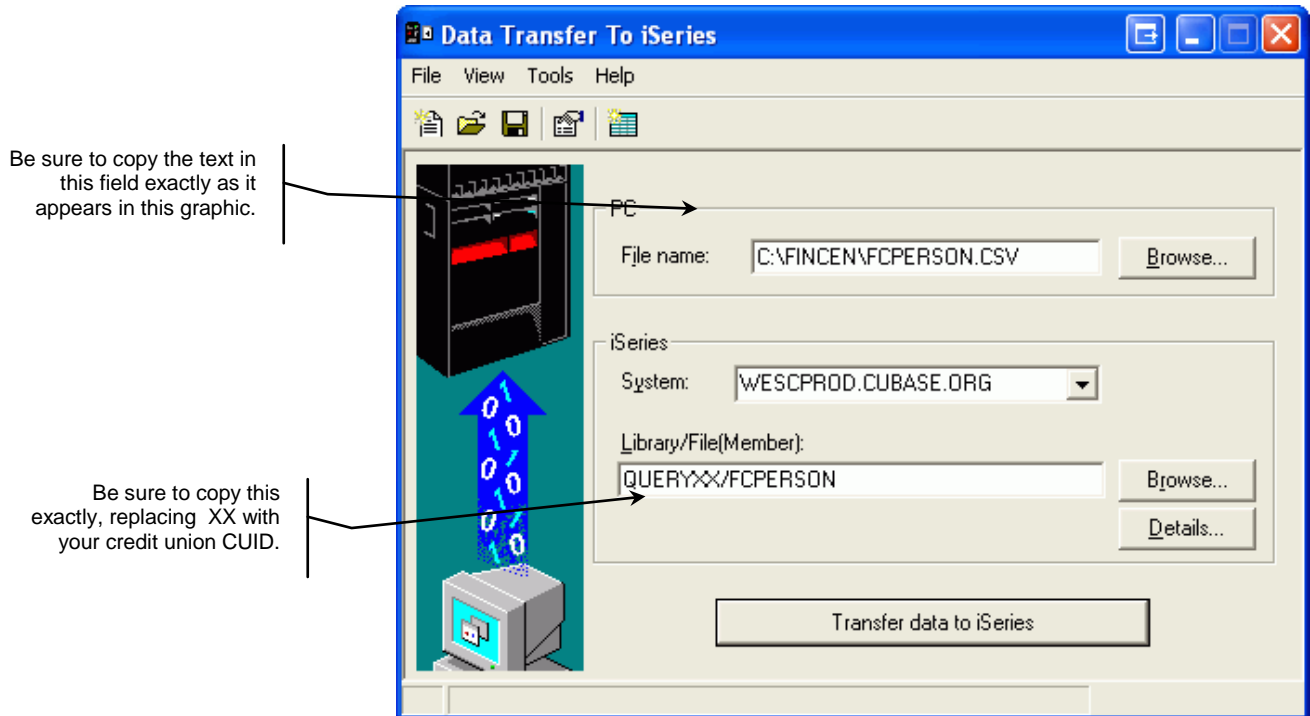


7. Click the “Transfer data to iSeries” button to complete the upload.

8. Next, upload the FCPERSON file. Select #2 from the MNFILE menu shown below.

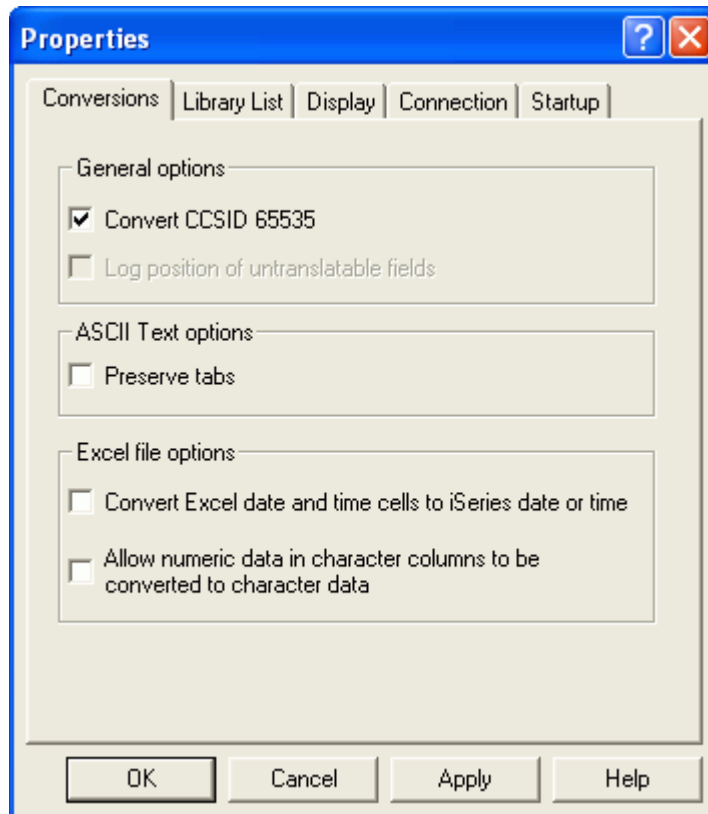


9. Fill in the screen as shown below.

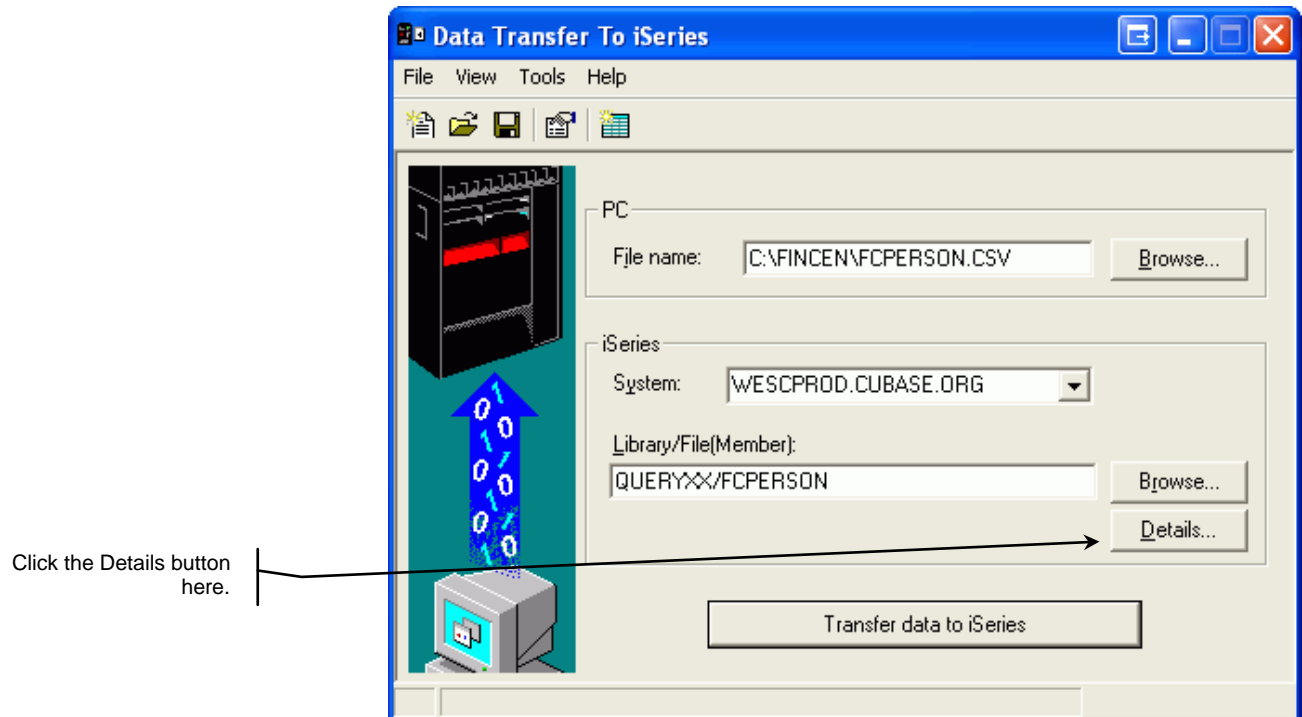


10. From the previous screen, select File | Properties.

11. Check the “Convert CCSID...” checkbox.

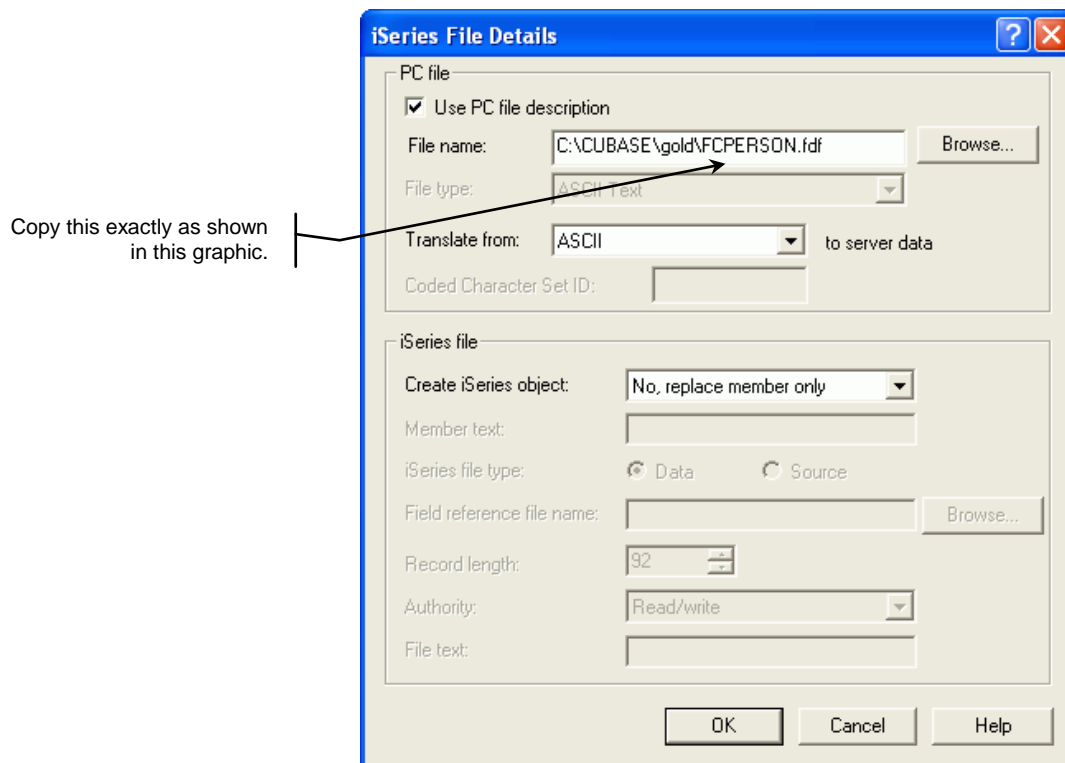


12. Click the Apply button and then the OK button.

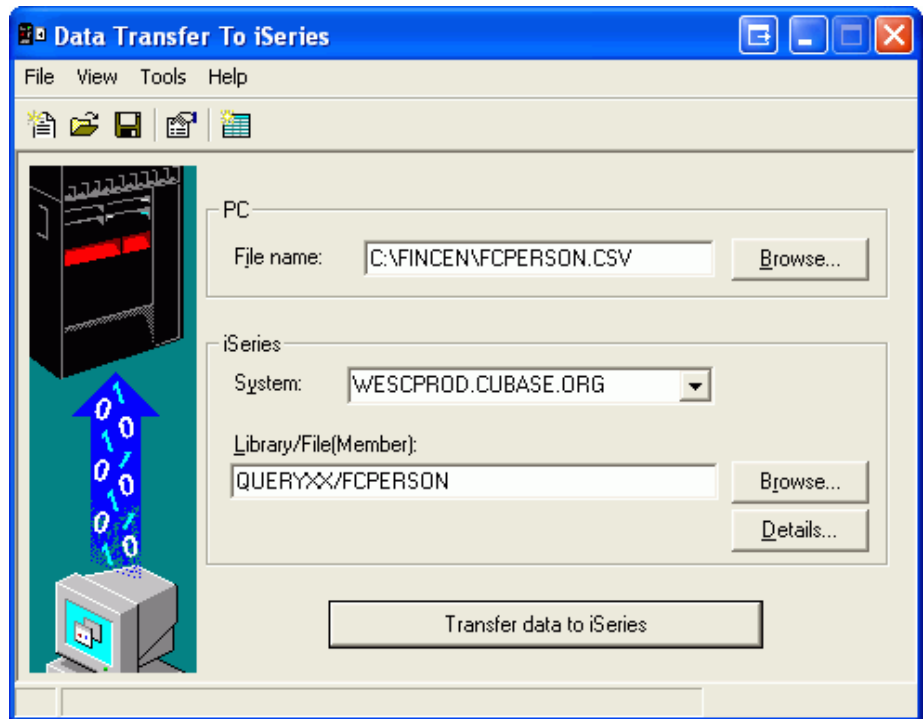


13. Click the Details button.

14. Ensure the screen is filled as in the screen below.



11. Click the OK button.



12. Click the “Transfer data to iSeries” button to complete the upload of the second file.

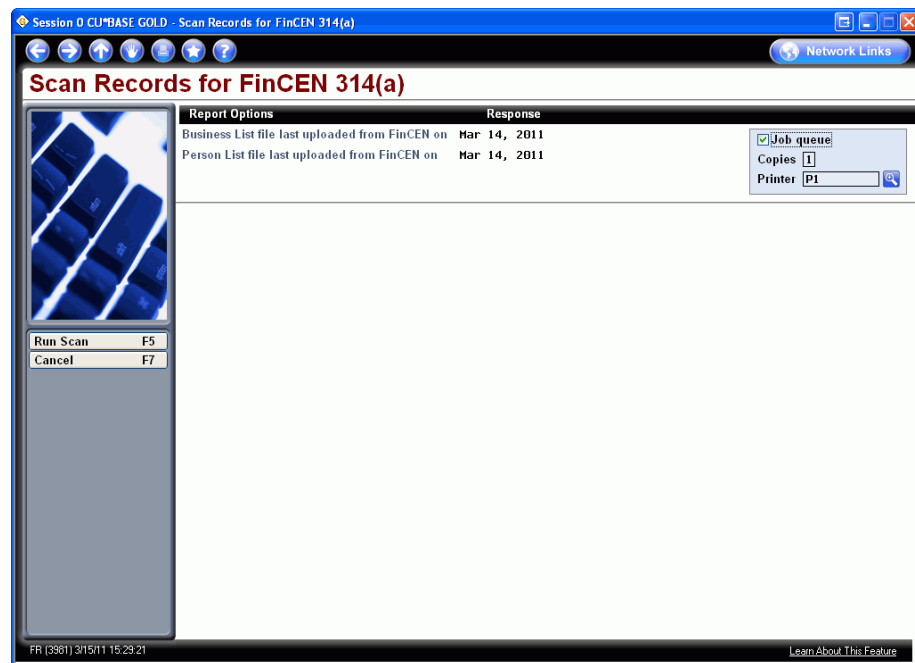
RUNNING THE SCAN

To run the scan, use the screen below and press F5-Run/Scan. This will generate the report.

IMPORTANT: Once the scan is run, the FCPERSON and FCBUSINESS files on the iSeries will be cleared. If you wish to run the scan a second time to produce another report, you will need to upload the files again to the iSeries. Follow the directions starting on page 4.

- **NOTE:** The dates on the screen are the dates the files were uploaded to the iSeries.

MNAUDT #12-Run FinCEN 314(a) Scan



HOW THE SCAN WORKS

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

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

- FIRSTNAME
- LASTNAME
- BIRTHDATE

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

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

- BUSINESS NAME

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

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

FCPERSON - Individuals

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

FCBUSINESS - Organizations

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

WHAT RESULTS SHOW ON THE FINCEN REPORT

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

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

- For example, if John Smith appears on the report, he is suspect since his first name, last name and birth date resulted in a match.

However, if all of the other fields on the report include asterisks (indicating no match), it is more likely that he is a false positive.

REPORT SAMPLE

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

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