# 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 **Run FinCEN (314a) Scan** on the Auditing (MNAUDT) menu, 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.

#### CONTENTS

REQUESTING ACCESS	2
PROCEDURES FOR PREPARING FILES	3
DOWNLOAD FILES FROM THE FINCEN WEBSITE PREPARATION: FIRST TIME AT CREDIT UNION ONLY UPLOAD FILES TO ISERIES	3 4 4
RUNNING THE SCAN	11
How the Scan Works What Results Show On the FinCEN Report Report Sample	11 12 13

**Revision date: August 5, 2015** 

For an updated copy of this booklet, check out the Reference Materials page of our website: http://www.cuanswers.com/resources/doc/cubase-reference CU\*BASE<sup>®</sup> is a registered trademark of CU\*Answers, Inc.

# **REQUESTING ACCESS**

Special authority is required to upload files from a PC onto the CU\*BASE system. Start by completing the **iShield Security Access Request for CU\*BASE Uploads/Downloads** form to request access privileges:

http://www.cuanswers.com/pdf/spec\_interest/iShieldRequestForm.pdf

Request upload authority to the FINCEN files in QUERYxx (FCPERSON and 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 (<u>https://www.fincen.gov/314a</u>) 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 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 Run FinCEN 314(a) Scan on the Auditing (MNAUDT) menu.
- 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 11), 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.

Session 0 CU*BASE GOLD I	Edition - ABC TESTING CREDIT	JNION		
File Edit Tools Help				
File Transfer / /	Audit Functions		Search fo	r 📃
My Menus 5300 Call Report Tools ACH/Payroll Processing Auditing Functions Back Office Check Processing Configuration Functions CU'BASE Main Menu CU'BASE Report Builder 1 CU'BASE Report Builder 1 CU'BASE Report Builder 2 ~ My Shortcuts Acct Adjustment (Full) Add Club Members ATM Check Digit Calc Calc Number of Days Calculate Check Digit Change Printer Outqueue Close Memberships/Accts	File Transfer Funct 1 = File Download (iSc 2 = File Upload (PC to Miscellaneous Pro 6 = Copy Report to Di 7 = Work with Query Data Match 12 = Scan a Single Nar Miscellaneous File 13 = Credit Card Letter	eries to PC) i Series) Cesses sk File ne Through OFAC s for Vendors	AIRES Processing 16 Create AIRES Files 17 Delete AIRES Files 18 View AIRES Files 19 List AIRES Files ALM Processing 21 Create/Download C 22 Create/Download C 23 Create/Download C 24 ALM Downloads to	G/L Info Loan Info CD Info
Collateral - VIN# Lookup Collection Processing		🛠 Custom Menu	🗴 Loan Quoter	🛱 Main Menu
Shortcut				
	Phone Operator	Y Preferences	% Rate Inquiry	🗙 Signoff
←→↑॥≞♂	<i>i</i> ? @			MNFILE FR (958) 6/25/13

1. Select *File Upload (PC to iSeries)* on the File Transfer/Auditing Functions (MNFILE) menu.

2. First upload the **FCBUSINESS** file to the iSeries. Fill in the screen exactly as shown below.

😰 🛛 Data Transfer to IBM i	
View Tools Help	
Enter the path and file name exactly as shown here, along with the correct file extension. You can also use the <b>Browse</b> button to the right to search for the file on your computer. BM i IBM i	C:\FINCEN\FCBUSINESS.CSV Browse PROD.CUANSWERS.COM
Library/File	
Remember to	(/FCBUSINESS
enter your CUID	Details
the XX.	Transfer data to IBM i

#### **Field Descriptions**

-		
Field Name	Description	
PC	These settings refer to where the data is going.	
File name	Enter the path (the storage location, both drive and folder) and file name where the downloaded file should be stored on your PC. Use backslashes between the folder name and the file name, as in the sample above. HINT: Locating files to upload and keeping your computer storage clean will be much easier if you designate a special folder for these files.	
IBMi	These settings refer to where the data is going to.	
IBMi	This designates the iSeries system from to which the files will be uploaded. For online credit unions, this will read PROD.CUBASE.COM and should not be changed.	
	• NOTE: For CU*Northwest clients use PROD.CU-NORTHWEST.com and for CU*South clients use CUSOUTH.CUBASE.org	
Library/File (Member)	Enter your credit union's Query library name, a forward slash, then the name of the file definition, that has been specifically created for the G/L Upload QUERYxx/FCBUSINESS	
	(For the xx, fill in your credit union's two-character credit union ID)	

3. Click the **Details** button

4. Enter **C:\CUBASE\CUBASE\RESOURCES\FCBUSINESS.FDF** in the screen as shown below (casing doesn't matter):

IB	M i File Details			e ? <mark>×</mark>
Г	PC file			
	Use PC file de	scription		
	File name:	C:\cuba	ase\cubase\resources\FCBUSIN	ESS Browse
	File type:	ASCII 1	Fext	-
	Translate from:	ASCII	▼ to IBM	l i data
	Coded Character	Set ID:		
Г	IBM i file			
	Create IBM i object	et:	No, replace member only	•
	Member text:			
	IBM i file type:			
	Field reference file	e name:		Browse
	Record length:		92 🚊	
	Authority:		Read/write	Y
	File text:			
			OK Cance	el Help

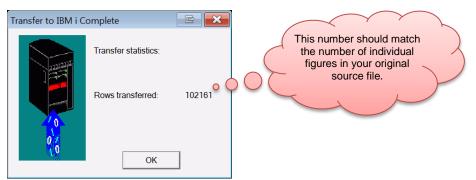
5. Click **OK** to save and return to the Data Transfer window.

📳 Data Transfer t	o IBM i		E .		×
File View Too	ls Help	_			
New	Ctrl+N	1			
Open	Ctrl+O	L			
Save	Ctrl+S	L			
Save As		BUSINESS.CSV		Browse	
Properties		<u> </u>			_
1 C:\Users\	\test transfer	/ERS.COM	<b>T</b>		
Exit		LIND.COM	<u> </u>		
0,0	Library/Hile(Member):			B <u>r</u> owse Details	
	Trar	nsfer data to IBM i		]	
Current transf	er request properties				

6. From the screen shown above, select the *File* menu and choose *Properties*.

Properties	E ? ×
Conversions Library List Display Connection	on Startup
General options	This option must be
Log position of untranslatable     Store DECFLOAT values as cha	selected for the upload to work properly.
ASCII Text options	
Excel file options Convert Excel date and time cells to I	
OK Cancel Ap	ply Help

- 7. Check Convert CCSID 65535 as shown above.
- 8. Click OK.
- 9. To begin the transfer process, click the Transfer data to IBM i button. A series of messages will appear to report on the progress of the transfer.
  - If you experience problems uploading, it may be because you have not been authorized to upload data. If you receive the error: "Data in this field is incorrect or does not match the PC data type," make sure to set the properties as shown above.
- 10. When the transfer is complete, the following message will appear:Click OK and the Data Transfer dialog box will reappear. Click Close [X] to return to the CU\*BASE menu.



11. The file is now uploaded to the FCBUSINESS file definition.

12. Next upload the **FCPERSON** file to the iSeries. Fill in the screen exactly as shown below.

🗒 Data Transfer to IBM i	
le View Tools Help	
Enter the path and file name exactly as shown here,	
along with the correct file extension. You can also use	
the <b>Browse</b> button to the right to search for the file on Vous computer	Browse
your computer.	
IBM i:  PROD.CUANSWERS.COM Library/File(Member):	•
	Browse
Remember to enter your CUID here in place of	<u>D</u> etails
Transfer data to IBM i	

#### **Field Descriptions**

Field Name	Description	
PC	These settings refer to where the data is going.	
File name	Enter the path (the storage location, both drive and folder) and file name where the downloaded file should be stored on your PC. Use backslashes between the folder name and the file name, as in the sample above. HINT: Locating files to upload and keeping your computer storage clean will be much easier if you designate a special folder for these files.	
IBMi	These settings refer to where the data is going to.	
IBMi	This designates the iSeries system from to which the files will be uploaded. For online credit unions, this will read PROD.CUANSWERS.COM and should not be changed.	
	• NOTE: For CU*Northwest clients, this should be left as PROD.CU-NORTHWEST.com and for CU*South clients this should be left as CUSOUTH.CUBASE.org.	
Library/File (Member)	Enter your credit union's Query library name, a forward slash, then the name of the file definition, that has been specifically created for the G/L Upload QUERYxx/FCPERSON	
	(For the xx, fill in your credit union's two-character credit union ID)	

13. Click the **Details** button

14. Enter **C:\CUBASE\CUBASE\RESOURCES\FCPERSON.FDF** in the screen as shown below (casing doesn't matter):

IBM i File Details	E ? ×
PC file	
Use PC file description	1
File name: b:\cub	ase/cubase\resources\FCPERSON.fr Browse
File type: ASCII	Text
Translate from: ASCII	▼ to IBM i data
Coded Character Set ID:	
IBM i file	
Create IBM i object:	No, replace member only
Member text:	
IBM i file type:	Data     C Source
Field reference file name:	Browse
Record length:	92 🚊
Authority:	Read/write 💌
File text:	
	OK Cancel Help

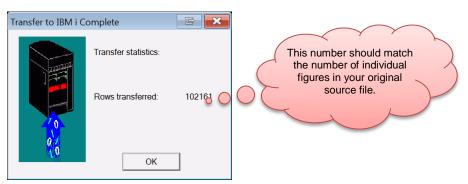
15. Click **OK** to save and return to the Data Transfer window.

🖪 Data Transfer t	o IBM i		
File View Too	ls Help		
New	Ctrl+N	1	
Open	Ctrl+O		
Save	Ctrl+S		
Save As		PERSON.CSV	Browse
Properties			
1 C:\Users\.	.\test transfer	/ERS.COM	<b>_</b>
Exit		LINS.COM	
000	Library/File(Member):	_	Browse Details
	Tra	insfer data to IBM i	
Current trans	fer request properties		

16. From the screen shown above, select the *File* menu and choose *Properties*.

Properties	P ? ×
Conversions Library List Display Connection	Startup
General options Convert CCSID 6957 Log position of untranslatable Store DECFLOAT values as cha	This option must be selected for the upload to work properly.
ASCII Text options	
Excel file options Convert Excel date and time cells to IB Allow numeric data in character column converted to character data	
OK Cancel App	ly Help

- 17. Check Convert CCSID 65535 as shown above.
- 18. Click OK.
- 19. To begin the transfer process, click the Transfer data to IBM i button. A series of messages will appear to report on the progress of the transfer.
  - If you experience problems uploading, it may be because you have not been authorized to upload data. If you receive the error: "Data in this field is incorrect or does not match the PC data type," make sure to set the properties as shown above.
- 20. When the transfer is complete, the following message will appear: Click OK and the Data Transfer dialog box will reappear. Click Close [★] to return to the CU\*BASE menu.



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

# **RUNNING THE SCAN**

To run the scan, use the screen below and press *Run/Scan* (F5). 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.

#### "Run FinCEN 314(a) Scan" on the Auditing (MNAUDT) menu

Session 0 CU*BASE GOLD Edition - ABC TESTIN	IG CREDIT UNION	E
Report Options R	Response	
Business list file last uploaded from FinCEN on	Jul 18, 2012	✓ Job queue
Person list file last uploaded from FinCEN on	Jul 18, 2012	Copies 1
		Printer P1
Run Scan		
← → ↑ II ≜ ♂ i ? @		FR (3981)

#### 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			PAGE
RUN ON 1/04/12		FINCEN 314(a	a) SCAN		USER
PERSON LIST - DOWNLOADED 1/04/12 PEF	CON DECODDO	CONNED - 102			
PERSON LISI - DOWNLOADED 1/04/12 PER	SON RECORDS	SCANNED - 105			
******************** CU MASTER FILES *******	**********	*****	****** FINCEN F	ILE *******	
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 FI	LE *****	
12 ANNE J. NONMEMBER	MSNONMBR	LNAME	LAST NAME	44444	
	MSNONMBR	FNAME	FIRST NAME	44444	
	MSNONMBR	BDATE	DOB	44444	
******************** CU NONMBR FILES *******	*********	*****	****** FINCEN FI	T	
51 JOHN A. OLDMEMBER	MSHIST	BDATE	DOB	777777	
51 OOHN A. OEDMEMBER	MSHIST	LNAME	LAST NAME	777777	
	MSHIST	LNAME	LASI NAME	777777	
	MSHIST	FNAME LNAME	ALIAS_ FIRST_NAM ALIAS LAST NAME	777777	
	MSHIST MSHIST	SSN	*NUMBER	777777	
	M011101	5514	NOMBER	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
<pre>** 1 = Active account matches</pre>					
<pre>** 1 = Closed account matches ** 1 = Non-Member matches</pre>					
BUSINESS LIST - DOWNLOADED 1/04/12 BUS	INESS RECORD	S SCANNED = 29	)		
***** FILES ****** CU MASTER FILES ******	**********	****	****** FTNCEN F	TT.E. *******	
ACCT BASE MEMBER NAME	FILENAME		FIELD MATCHED		
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					
<pre>** 0 = Closed account matches</pre>					
** 0 = Non-Member matches					