
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” and “Palestinian Legislative Council (PLC)” lists 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/client_reference.php
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OVERVIEW

GETTING STARTED

This feature is designed to assist your credit union with its required due diligence for complying with current OFAC rules. Here's how it works:

1. Every morning, CU*Answers Operations will download the most current Specially Designated Nationals (SDN) and Palestinian Legislative Council (PLC) lists from the OFAC web site for use by your credit union.
2. At any time, use the new "Match OFAC Data Against Mbrs" command on menu MNFILE. (See the following pages for instructions.) Automated scans can also be activated to run when creating new member and non-member records. (See Page 7.)
3. After the report is printed, evaluate each reported match carefully, noting any "false positives." For any valid matches, follow OFAC guidelines available at www.ustreas.gov/offices/enforcement/ofac to report them according to current regulations.

WHEN IS AN OFAC SCAN RUN?

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

- Periodically, the credit union should run a batch scan on the entire member and non-member database. This ensures that member and non-member records are regularly run through OFAC in case there are changes in status after the initial creation. **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 7.**
- Every time an Account-to-Account (A2A) relationship is set up (relationship with other FI), or when an outgoing wire, corporate check or money order is created (including loan disbursements), an OFAC scan is automatically run. **SEE PAGE 12.**
- A manual OFAC scan can be run on any item at any time using the stand alone OFAC scan. **SEE PAGE 12.**

MONTHLY FEE FOR THE DATA MATCH SERVICE (ONLINE CUS)

Online credit unions that activate the OFAC scan (see Page 7) 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.treas.gov/offices/enforcement/ofac/sdn/>

PLC List:

<http://www.treas.gov/offices/enforcement/ofac/programs/terror/ns/index.shtml>

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 file from the OFAC web site. There will be no fee for this service since you will be downloading the file yourselves.

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.

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/PLC 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 SDN/PLC 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/PLC 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.

MNAUDT #3 or MNFILE #11 "Run OFAC Data Match (Batch Scan)"

The date range fields let you check only memberships opened within a certain timeframe.

Use these fields to scan for countries that are currently listed as "sanctioned" by OFAC (available on the OFAC web site.)

Use this screen 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. 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.

Field Descriptions

Field Name	Description
From date To date	Use these fields to check only against members that were opened during a certain time period. Leave both fields blank (0/00/0000) to check all memberships. NOTE: Use these fields with caution. Even if you have previously scanned an open date range using this scan (for example the previous year), it is possible (after refreshing your file) that there will be new hits for this previously scanned range (previous year in this example). A member who was not on the list when you ran the scan earlier may now be added. In order to see all possible hits for your credit union, including these updated ones, leave these fields blank.
Countries to scan for	These are the country names against which your files will be scanned. This list is maintained on a quarterly basis by Audit Link. For the country scan, only records where the Foreign address flag is checked will be scanned. (This flag is ignored when scanning against names, however.)

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			LUOFAC		PAGE 1	
DATA MATCH: STATEMENT OF MATCHED RECORDS								
List Downloaded From OFAC: 05/10/10								
***** CU FILES ***** OFAC FILE *****								
File Name - MASTER								
ACCT	BASE NAME	MATCH TYPE	SDN NAME	OFAC ID	SDN TYPE	OFAC PROGRAM	OFAC REMARKS	
36574	VICTOR M MEMBER JR	NAME	MEMBER, LAURA VICT	7302	individual	SDNT	DOB 31 Oct 1960	
36646	SERGIO F MEMBER	NAME	MEMBER, SERGIO	7176	individual	SDNTK	DOB 22 Nov 1950	
37324	MANUEL P MEMBER	NAME	MEMBER, MANUEL MARTIN	1656	individual	CUBA	-0-	
39321	ANDRE MEMBER	NAME	MEMBER, MIGUEL	4427	individual	SDNT	DOB 14 Jul 1970	
39590	MARIA E MEMBER	NAME	MEMBER, MARIA	4648	individual	SDNT	DOB 20 Jul 1960	
39590	MARIA E MEMBER	NAME	MEMBER, MARIA LUZ NELL	8510	individual	SDNT	Cedula No. 9999	
39960	RICHARD M MEMBER	Alt Name	MEMBER, RICHARD	8166	individual	SDNT	Cedula No. 9999	
File Name - MSNONMBR								
ACCT	BASE NAME	MATCH TYPE	SDN NAME	OFAC ID	SDN TYPE	OFAC PROGRAM	OFAC REMARKS	
1144199	P S A	NAME	NONMEMBER, CESAR	4508	individual	SDNT	DOB 20 May 1960	
1144199	P S A	NAME	NONMEMBER, FRANCI	4265	individual	SDNT	DOB 29 Apr 1960	
1144199	P S A	NAME	NONMEMBER, DELCY PAT	8432	individual	SDNT	Cedula No. 6999	
1144199	P S A	NAME	NONMEMBER, SIMON	9916	individual	SDNTK	DOB 12 Feb 1960	
1144199	P S A	NAME	NONMEMBER, BAKIR	7650	individual	BALKANS	DOB 1 Oct 1956	
File Name - A2AMBR								
ACCT	BASE NAME	MATCH TYPE	SDN NAME	OFAC ID	SDN TYPE	OFAC PROGRAM	OFAC REMARKS	
39278	SANDRA K AMEMBER	NAME	AMEMBER, SANDRA	7422	individual	SDNT	DOB 7 Jul 1970	
*** 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 (see the File Name column) matched the name shown on the SDN or PLC list.
- ♦ **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 PLC 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:

www.ustreas.gov/offices/enforcement/ofac

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.

***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 are prepared.*

After your internal policies are in place, use the Member Service Workflow Controls feature on menu MNCNFC to activate this flag. **Remember that you will still need to run the normal OFAC report on a regular basis,** because the OFAC list is routinely changed and updated by the government.

(See page 7 for screen shots of this type of scan.)

MNCNFC #26 “Member Service Workflow Controls”

Session 0 CU*BASE GOLD - Workflow Controls for Opening Memberships

Workflow Controls for Opening Memberships

Corp ID 01 ALPENA ALCONA AREA CREDIT UNIO
Branch # 01 ALPENA - MAIN

Defaults for Workflow		
<input checked="" type="checkbox"/> OFAC scan	<input checked="" type="checkbox"/> Check blocked persons file	<input type="checkbox"/> ID check
<input type="checkbox"/> Master greeting setup	<input checked="" type="checkbox"/> Joint owner setup	<input type="checkbox"/> Beneficiary (POD) setup
<input type="checkbox"/> Credit report	<input checked="" type="checkbox"/> Open sub-accounts	<input type="checkbox"/> Loan contract
<input type="checkbox"/> ARU/home banking setup	<input type="checkbox"/> E-statement enrollment	<input type="checkbox"/> Bill payment enrollment
<input type="checkbox"/> Email address reminder	<input type="checkbox"/> Marketing clubs	
<input type="checkbox"/> Use 000000000 when home phone not known		
<input type="checkbox"/> Request previous address if at current address less than 00 months		

Required Fields		
<input checked="" type="checkbox"/> Reason code	Default code	(Blank = no default)
<input type="checkbox"/> Department/sponser	Default code	(Blank = no default)
<input checked="" type="checkbox"/> Driver's license # and state	Default state	(Blank = no default)
<input checked="" type="checkbox"/> Mother's maiden name		
<input type="checkbox"/> Code word		

Backup F3
Save F5
Cancel F7
Cpy to all Brnchs F13

FR (2427) 2/27/09 14:26:32

Learn About This Feature

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 12 for details about the monthly fee that will begin being charged when this is activated.)

RUNNING NEW MEMBER AND NON-MEMBER SCANS

If activated, scans will be run automatically:

- ◆ When a credit union employee opens a new memberships in CU*BASE (see Page 8),
- ◆ When approving a membership application submitted through online banking (see Page 10), and
- ◆ When creating or modifying a non-member record for any reason, such as a joint 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.)

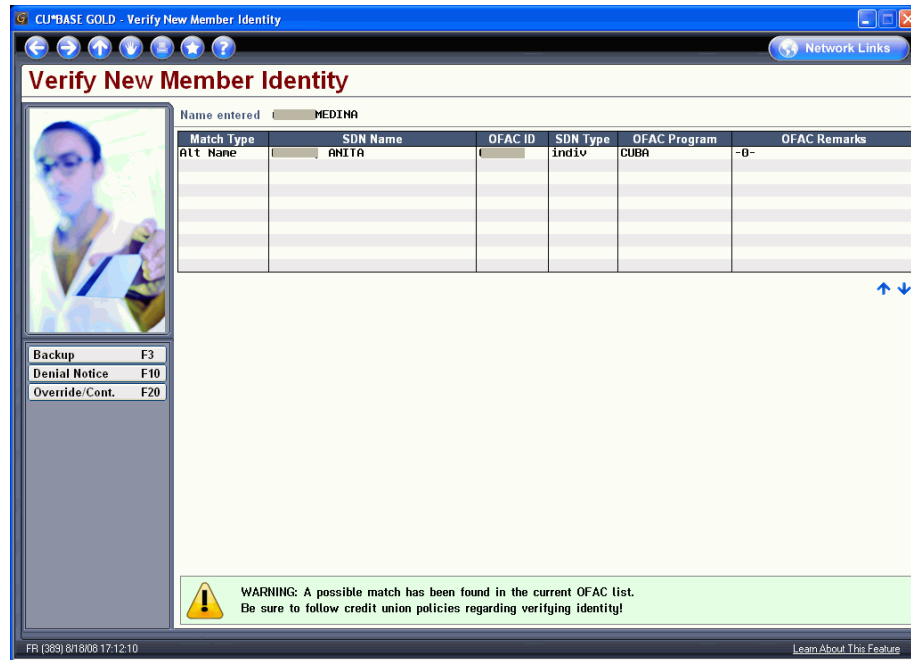
MNSERV #13 "Open/Maintain Memberships/Accts"

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 press Enter (you can also use F15-OFAC 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
F3-Backup	Use this to return to the membership creation screens so that you can perform additional inquiries, check the spelling of the name, or cancel the operation completely.
F10-Denial Notice	<p>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.</p> <p>If a membership notice is actually <i>printed</i>, CU*BASE will also mark the <i>Deny membership</i> flag on the non-member record, along with the Denial Type code used (as the reason for the denial), and the date.</p>
F20-Override/Continue	<p>Use this to override the results of the scan and proceed to create the membership.</p> <p>Follow your credit union’s established procedures for documenting a membership that is created after a suspected OFAC match was found.</p>

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:

www.ustreas.gov/offices/enforcement/ofac

MNSERV #21 "Work/View Online Bankg Apps/Requests"



The same OFAC scan will be run automatically when you use the Approve (1) option on this screen to approve a membership application.

The OFAC scan will also be run when you use the Change (2) or View (5) 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.

MNMRKT #5 "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 CU*BASE processes, such as creating joint owners and 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 F15-Verify Name). If a match is found, the Verify New Member Identity information screen shown on Page 9 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.

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 or Beneficiaries, for example
- Outgoing wires (Payee)
- Incoming International ACH Transactions (IAT) (All addendum items) Refer to the *International ACH Transactions (IAT) booklet on the Reference Page for more information about IAT OFAC scans.*
- A2A Account Relationships when created (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 Lending menu (MNLOAN) #2-Disburse Member Loan Funds)

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

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 three locations: the CU*BASE Time-Out window or via two menu options (MNAUDT #4 or MNFILE #12-Scan a Single Name Through OFAC). This new 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

MNAUDT #4 or MNFILE #12 - Scan a Single Name Through OFAC

Or F18-OFAC from the Time Out Window

OFAC Scan - Individual



OFAC Scan - Organizational



- The window will default to the individual screen. Use F9-Organizational 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 F9-Organization Acct to enter an organization name.

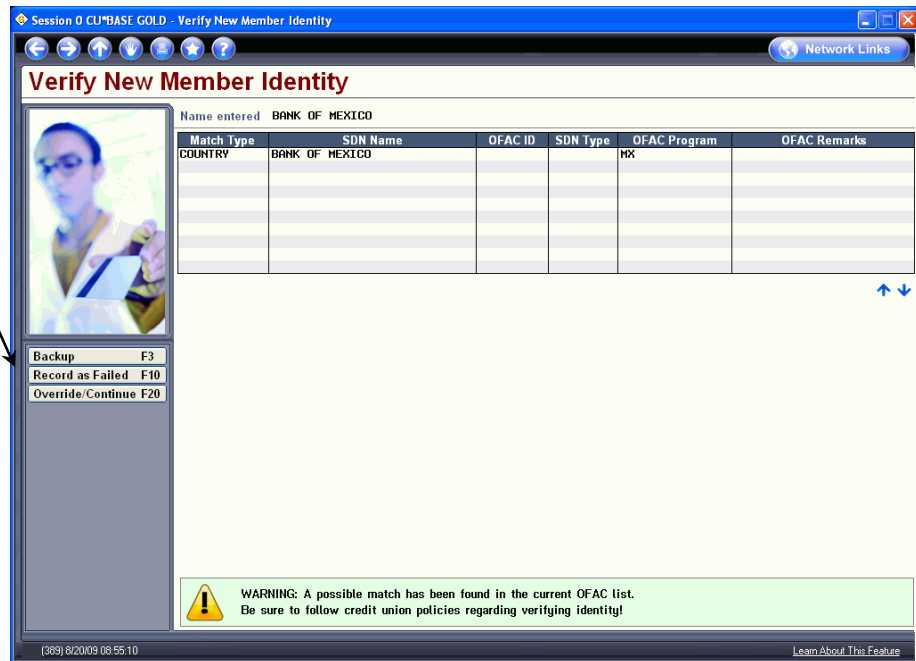
Press Enter to run the scan on the item. The scan will either result in a Pass or Suspect. A Suspect must either be marked as Failed by using F10-Record as Failed or be overridden by using F20-Override/Continue.

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 F20-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.

TRACKING OF OFAC SCANS

AUDIT TRACKER RECORDS SCANS ON MEMBERSHIPS

The OFAC/PLC 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, a 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 expected match." If a member fails this scan, the pop up window will appear allowing the employee to deny membership or override the scan. Selecting F10-Denial 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 F20-Override will, however, create a Tracker with a Memo Type of OO (Overridden) and the message text "A possible match has been found the current list. Override performed on mm/dd/yyyy 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 OP (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."

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 F21-Tracker Review to view the Member Tracker Review.

Member Inquiry (Use F21-Tracker Review)

The screenshot displays the 'Member Account Inquiry' window for 'SUZIE K MEMBER'. The account was opened on August 18, 1993. The account type is 'REGULAR SAVINGS' with a 'US' division. The current balance is 284.36, with an annual withholding of 0.00. The period average balance is also 284.36, and the period minimum balance is 284.36. The net available balance is 284.36, with no YTD club benefits. The first date negative is 00000000. The dividend information shows a payment code of '1 ADD DIV. TO CURRENT' and a transfer account of '00000000-000'. The dividend amounts for quarters 1, 2, 3, and 4 are 0.09, 0.00, 0.00, and 0.00, respectively. The total dividend is 0.09, with 0.00 accrued. The transaction inquiry date is set to Dec 31, 2008.

Account Information		MSR	
Account #	SUZIE K MEMBER	G/L account	902.00-01
SSN/TIN		ATM ID	
	Joint Owners	# of ATM withdrawals	
	Beneficiaries	# of ATM overdraws	
Account type	050 REGULAR SAVINGS	Frozen	0 NO
Div appl	US REGULAR SAVINGS	Passbook	NO
		AFT	NO
		Payroll	NO
		Last date negative	00000000
		# of withdrawals	0
		# of transfers	0

Dividend Information			
Dividend payment code	1 ADD DIV. TO CURRENT	Quarter 1	0.09
		2	0.00
Dividend transfer account	00000000-000	3	0.00
		4	0.00
		Total	0.09
		Accrued	0.00

2. Here you will view a list of the member's trackers (they might have a Collections (XX) or Sales (ST) Trackers as well) and you will see the Audit Tracker in the list. Select to view this tracker to view the Audit Tracker Conversations.

Member Tracker Review (1)

Session 0 CU*BASE GOLD - Member Tracker Review

Member Tracker Review

Member: SUZIE K MEMBER

Selection Options

Date: [MMDDYYYY] Time: []

Account type: 000 Tracker type: []

Reference: []

Date	Time	Account Type	Reference	Speaking With	Type	ID
6/01/2009	7:57:14	000	Audit Tracker	SUZIE K MEMBER	AUDT	JJ

Backup F3
Work Follow-ups F17
Tracker Entry F20

View Update

FR (469) 6/10/09 14:51:53 [Learn About This Feature](#)

- 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)

Session 0 CU*BASE GOLD - Member Tracker Review

Member Tracker Review

Account: SUZIE K MEMBER

Conversations: 37

Position to date: [MMDDYYYY]

Contact - Date: 06/01/2009 Time: 07:57:14 By Emp: JJ
Name: [] Memo Type: OP OFAC/PLC Pass

OFAC scan run on 06/01/2009. No suspected match.

Backup F3
Sort Contact Date F11

FR (367) 6/10/09 14:53:40 [Learn About This Feature](#)

TRACKING NON-MEMBER ITEMS

CU*BASE now records all OFAC non-member scans (and scans that cannot be attached to a MASTER record in the OFACNOTE file. (In addition, this tracks all scans related to memberships as well.) Following is an example of the contents of the file:

Scan Reason	Scan Program	Scan Date	Scan Time	Scan User	Scan Info	
OFAC FINCEN	Description	CCYYMMDD	HHMMSS			
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
000003	OFAC	OPEN NEW MEMBERSHIP	20,100,907	160,952	-8	OFAC scan run for BUGS Q. BUNNY for SSN 123456789 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
000007	OFAC	NON-MEMBER MAINT	20,100,908	172,944	-9	OFAC scan run for ANY L. BODY for SSN 123456789 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.