

Access[®] Online

OFAC Requirements (August 15, 2018)

Legal name requirements for account creation and maintenance will be reactivated by August 15th, 2018.

Reason for the change:

- To comply with the United States Bank Secrecy Act and USA PATRIOT Act, as well as with Canada's Proceeds of Crime (Money Laundering) and Terrorist Financing Act and Criminal Code in the fight against the funding of terrorism and money laundering activities, U.S. Bank must provide evidence that we know who we are doing business with, including individual cardholders.
- Beginning December 2, 2017, U.S. Bank required that all clients enter a cardholder's full legal name on account set-up requests in Access[®] Online. The release on February 24th, 2018 would have made the legal name required to complete account maintenance on any account that did not already have the legal name on file. In an effort to provide more time to gather the needed information, the deadline for public sector clients was extended to August 15th and the legal information section was deactivated for a period of time.

What is being requested?

- U.S. Bank is responsible for collecting the employee's full legal name (first, middle, last).
 - Middle name is not required, but if middle name or initial are available, they should be entered.
- U.S. Bank also recommends that the date of birth and physical residential address be entered to provide better screening and decrease the likelihood of a false positive for an individual on the federal watch list.
 - PO Boxes are not acceptable in place of the employee's physical residential address.
 - If the physical residential address is not available, please do not provide the physical business address as a substitute. The value may be left blank.
 - If an account only has the full legal name populated and that cardholder is flagged as a potential match to an individual on a federal watch list,* in order for US Bank to meet its regulatory obligation, the address **or** date of birth information may be required in addition to the legal name. Failure to provide the address or date of birth within the requested timeframe will result in card suspension.
- While this information was not always requested in the past, we have enhanced our compliance programs in response to heightened regulatory expectations.
- This requirement will also be imposed on paper applications and transmission templates.
- For **department cards** there is a new option in the Product Selection screen to select Group Account or Individual Account. Once you select Group you will need to populate Legal Business Name before building the department card. If completing account maintenance, the same option appears in the legal information section.

Bulk Update Instructions: Go to Reporting --> Program Management ---> Account List. Then select the below inclusion criteria for your report. Once you have outlined the list of accounts requiring the update, please [click here](#) to download the file format for submission.

Report Criteria:

1. Make sure your internet browser's pop up blocker is off.
2. Leave all date range items/fields blank (at their defaults). This will give you a complete list.
3. Under the Account Information Section:
 - Hold down your control key and highlight all account statuses **except** those that are closed and will not re-open.
 - Closed Statuses: Closed, T9 – Termination/Permanent, V9 - Voluntary/Temporary, FA - Old Fraud Account, F1 - Old Lost/Stolen Account, P9 - Credit Closure.
 - **NOTE:** "blank" is synonymous with "open", so select both "blank" and "open" to view all accounts currently in an Open status.
 - Select "Cardholder Account" as the Account Type
 - Leave the Method section blank (the default)
4. Under the Additional Detail Section check the following boxes: Account Details & Account Owner's Information.
5. Select Excel as the Report Output
6. Under the Group Report By Section
 - Select the radial button next to Processing Hierarchy Position and click Search for Position or Add Multiple.
 - Select a hierarchy level of "Company", then click search.
 - This should show all Bank / Agent / Company number processing hierarchies available
 - Check the checkbox next to each Bank / Agent / Company number you would like to have included in the report
 - Click Select Position. This will add the hierarchies you checked in a column on the right side of your screen
 - Then click Accept Hierarchy.
 - Once the hierarchy is accepted, it will take you back to your Account List report criteria selection page so you can click "Run Report".
7. A new, blank browser window will open and run until the report has generated. It will then ask you if you want to open or save the file. Click Open.
8. Copy these values into the included file transmission template: Account Name and Account ID
9. Complete at a minimum the Legal Name Values and submit the completed template to your Account Coordinator.

Note: You will also need to send legal information to your Account Coordinator for all new cardholder accounts created between the time this file transmission template is submitted and when the legal information section within Access Online is reactivated for your Organization Short Name.

**Watch list includes persons of interest per the United States Bank Secrecy Act and USA PATRIOT Act, as well as with Canada's Proceeds of Crime (Money Laundering) and Terrorist Financing Act and Criminal Code.*