

Guidance on Filing the Annual Report of Blocked Property

(Last updated June 20, 2018)

The Office of Foreign Assets Control (OFAC) has compiled the following list of helpful tips and reminders for users preparing to submit their Annual Report of Blocked Property (ARBP).

Reminder on Reporting Requirements

- The ARBP is a comprehensive list of blocked property and the filing requirement applies only to persons holding blocked property as of June 30 of a given year.
- ARBPs must be filed annually by September 30.
- See [31 C.F.R. § 501.603](#) for detailed reporting requirements.

General Guidance

- Annual reports shall be filed using Form [TD F 90-22.50](#).
- Please do not aggregate multiple properties into a single listing in Part B of the report.
- Some financial institutions submit additional information regarding blocked property. This information may be beneficial to OFAC but is not required. Examples of additional information includes, but is not limited to:
 - Date the property was originally blocked,
 - Date the property was initially reported to OFAC as being blocked,
 - Specially Designated National (SDN) connection for which the property was blocked (name as it appears on the Specially Designated Nationals and Blocked Persons List).
- Restricted “Iranian accounts,” as defined in OFAC’s regulations, do not need to be reported to OFAC on the ARBP unless they are otherwise blocked. For additional information regarding Iranian accounts, please see 31 C.F.R. §§ [560.320](#), [560.427\(b\)](#), [560.517](#).
- The term “blocked property” only applies to property that is blocked pursuant to OFAC regulations. Property that has been unblocked by general or specific license, but that has not been returned to its owner, is not blocked property, and should not be reported to OFAC in the ARBP. This includes, for example, property of the Government of Sudan unblocked as a result of the January 17, 2017 issuance of the general license found at 31 C.F.R. § [538.540](#).

Tips for Filling out Part B - Property Reported

Please refer to the definitions on Form [TD F 90-22.50](#) for detailed explanations of all of the required fields. In addition, OFAC has provided additional information about a few of the fields in response to common reporting mistakes below.

Value Field

- The value listed for each asset should be that asset’s value as of June 30.
- Clearly indicate if the value listed is in a currency other than U.S. dollars.
- Blocked trade documents should be reported with a value of \$0.

Location Field

- Clearly state the location where the property is being held (e.g., New York, NY, USA).

Regulations Field

- The Regulations field should list a set of sanctions regulations or Executive Order that was in force as of June 30 of the given year (e.g., “Liberia” is no longer an active sanctions program and should not be listed as the legal authority pursuant to which a property was blocked).

- Please note that listing “SDN match” or “SDN” is not sufficient information to determine the applicable sanctions program regulation for Part B. Please instead list the applicable program tag or regulation citation. See OFAC’s [Program Tag Definitions page](#) for additional information.

Tips for Financial Institutions Submitting a Spreadsheet for Part B of the ARBP

- If your institution holds 20 or more blocked accounts, OFAC recommends but does not require you to file Part B of your ARBP electronically. Please do so in a spreadsheet format (e.g., Microsoft Excel) in lieu of a PDF or Word document.
- Please also complete and submit Part A along with your spreadsheet.
- Email the completed ARBP to OFACReport@treasury.gov by September 30 with a clearly labeled subject line (e.g., “Bank ABC’s 2018 ARBP Submission”).
- Please do not list the same asset on multiple tabs. It is okay (although not required) to utilize multiple tabs or a Summary tab. Please make sure all tabs are clearly labeled.
- Please do not hide any rows or merge fields. If an asset should not be included, completely remove it from the report. Each cell should contain the information that corresponds to one field as represented on the form (unless you are providing additional information as noted above in the General Guidance section).

For further information regarding the ARBP or reporting requirements, please contact us through our Toll Free Hotline at 1-800-540-6322 or through email at OFAC_Feedback@treasury.gov.

This document is explanatory only and does not have the force of law. [31 C.F.R. Part 501](#) contains the legally binding provisions governing these reporting requirements. This document does not supplement or modify the regulations.

For additional information about the sanctions programs that OFAC administers, please contact the:

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