Specially Designated Nationals (SDN) Advanced Sanctions Data Model XML Explanatory Notes

A. Introduction

OFAC has released a new XML product in a format designed by the United Nations Al-Qaida Sanctions Committee. The format provides detailed information that is sufficiently well categorized as to allow each user to parse the information most relevant to them.

This document provides a high-level overview of the new XML and helps to explain how OFAC has populated this new format with its SDN data.

The corresponding XML Schema Definition (XSD) file for this XML file is available here. OFAC strongly encourages using the XSD file as a guide when developing any application that parses this new XML format. The XSD represents the best guide as to the structure and layout of the new format.

B. XML Top Level Elements

The XML is divided into eight top-level elements.   These top-level elements reference each other to form a complete record of a sanctioned party.

➢ Date of Issue: The date that the file is published.

➢ Reference Value Sets: This element contains the various standard values and reference data used throughout the data file.

➢ Locations: This element contains all the location information and address data used throughout the data file.

➢ ID / Registration Documents: This element contains details on identification and registration documents associated with a sanctioned party.

➢ Distinct Parties: This element contains details about a sanctioned party, including name parts.

➢ Profile Relationships: This element details the relationships between sanctioned parties.

> Sanctions Entries: This element contains the administrative details associated with sanctioned parties, including sanctions program.

> Sanctions Entry Links: This element is not currently in use by OFAC. When used it describes the relationships between previously sanctions parties..
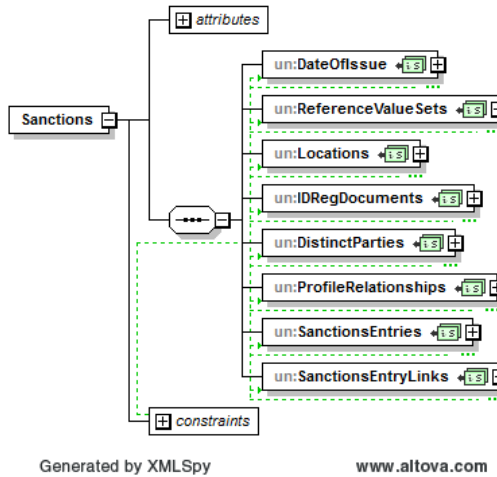

Figure 1: Overview of the XML Top Level Elements found in the XML Schema

1. Date of Issue

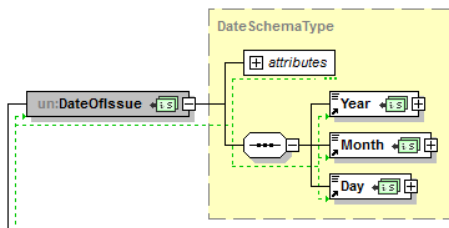This element lists the most recent publication date of the file.

Figure 2: Diagram of the Date of Issue Section of the XML Schema

2. Reference Value Sets

REFERENCE VALUE SETS contain the reference or "look-up" data used throughout the XML file. For example, the REFERENCE VALUE SETS section of the XML contains a list of countries with a corresponding ID (See Figure 3). When the data file needs to reference a country, it refers back to that country's unique ID number as defined in REFERENCE VALUE SETS. Where available, ISO codes and other industry standard values are used, such as ISO 3166 country codes.

The use of REFERENCE VALUE SETS is a key component of this new sanctions data format. It minimizes the need for free-text input, which in turn reduces the risk of input errors. The model has been designed so that any new kinds of information that may be required in the future

may be added by appending values to a reference set rather than changing the format of the output file.

Figure 3: View of Reference Value Sets with Country Values Expanded - Taken From the XML Data File

REFERENCE VALUE SETS contain what could be described as "look-up data" and are routinely updated. Each time OFAC updates the list and publishes a new version of the XML file, the REFERENCE VALUE SETS will be updated to cover any changes and additions to reference values used in file. The XML file only lists reference values that are in use by the file.

Some REFERENCE VALUE SETS can be nested within each other. For instance, SUBSIDIARY BODY has the value of "Office of Foreign Assets Control" and also refers to DECISION MAKING BODY, which has a value of "United States Treasury Department" (See Figure 4).

Figure 4: Subsidiary Body in the Reference Value Sets - Taken From the XML Data File

3. Locations

LOCATIONS are stored as a top-level element so that they can be referred to throughout the data. The LOCATION element groups three sub-elements that combine to provide the definition of each location: LOCATION AREA CODE, LOCATION COUNTRY, and LOCATION PART (See Figure 5).

LOCATION PART contains the bulk of address information such as street, city and postal code. LOCATION AREA CODE currently contains same data as LOCATION COUNTRY. The LOCATION AREA CODE element can be used to offer more specific location codes such as UN/LOCODE. UN/LOCODE is the "United Nations Code for Trade and Transport Locations."

OFAC does not currently make use of UN/LOCODE values, but an example of such a value would be "US WAS" for Washington, DC.
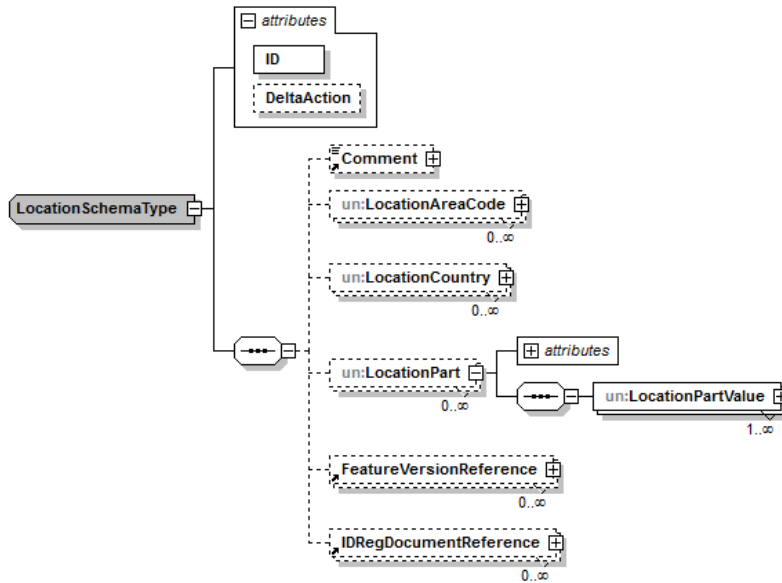

Figure 5: Diagram of the Location section of the XML Schema

LOCATION contains a back-reference to ID REG DOCUMENT and FEATURES. When a LOCATION acts as an address for sanctioned party, the LOCATION's FEATURE VERSION REFERENCE will refer back to the FEATURE VERSION of that sanctioned party. For more information on FEATURES and FEATURE VERSION see section 5.2 below.

LOCATION PART supports non-Latin script values. LOCATION PARTS containing values in non-Latin scripts will have the same format as those with the default Latin values. The name of the non-Latin script will appear as a COMMENT (See Figure 6 for an example using test data). Currently, OFAC only has the default Latin values for LOCATION data. LOCATION PART data will always have at least one Latin translation as the default script.

= LocPartTypeID	() LocationPartValue					
1451	▲ LocationPartValue (2)					
		= Primary	= LocPartValueTy...	= LocPartValueSta...	() Comment	() Value
	1	true	1	1		100 Street
	2	false	1	1	Chinese Simplified	100 街

Figure 6: Example of Location Part with non-Latin Values in the XML Data File (Please note this is test data)

4. ID/Registration Documents

The contents of this element describe the identification numbers and registration documents associated with a sanctioned party. Identifiers fall into this category when they come from documents issued by an official source like a government or organization. Most other identifier information will be included as a "feature." Features include any biometric data even if these data come from an officially issued document. Several attributes and sub-elements combine to fully define each identification document (See Figure 7).

ISSUED BY refers to the Country ID for the country of issue. ISSUED IN refers to a LOCATION ID and may contain more specifics on issuing locations. ID REGISTRATION NO contains the value of the document number. DOCUMENT DATE stores any dates (such as issue, expiry, cancellation, etc) associated with each document. ISSUING AUTHORITY contains a free-form text value of an issuing authority.
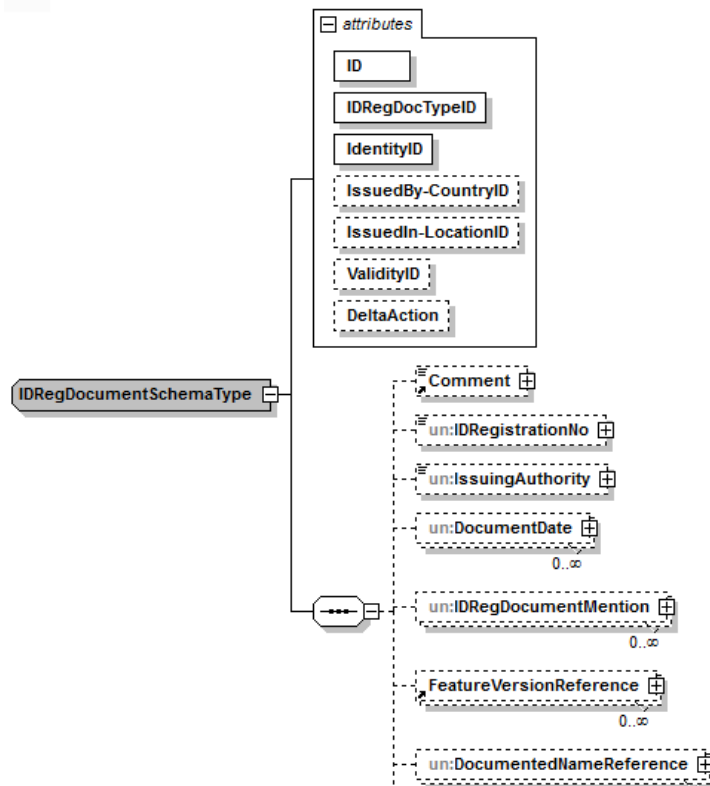

Figure 7: Diagram of the ID/Registration Document section of the XML Schema

ID / REGISTRATION DOCUMENTS refer to the IDENTITY that owns them, but are provided as a separate top-level element because they can also refer to several other elements. In OFAC's XML file, all ID/REG DOCUMENTS contain a reference to a DOCUMENTED NAME (For more information on IDENTITY and DOCUMENTED NAME, see the DISTINCT PARTY section below).

5. Distinct Party

The DISTINCT PARTY top-level element contains the bulk of the sanctions data associated with a sanctioned party, including the primary name and any aliases. Each DISTINCT PARTY element is associated with one SDN. The DISTINCT PARTY element is broken down into numerous sub-elements described below.

The DISTINCT PARTY element groups a sub-element called PROFILE. Currently in the OFAC XML file, each DISTINCT PARTY has a single PROFILE. Each PROFILE then has a single IDENTITY element and any number of FEATURE elements (See Figure 8 and the following sections for more details).

OFAC plans to maintain all known data about a party within a single PROFILE. OFAC does not plan to present different details for the same party, which might then require two separate PROFILES for the party.
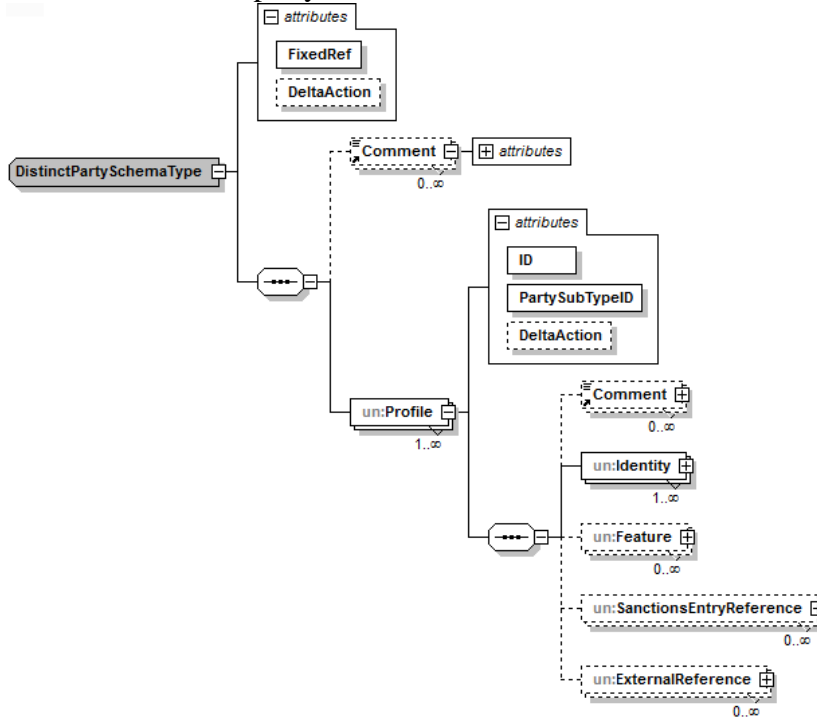

Figure 8: Diagram of the Distinct Party section of the XML Schema

Pre-existing SDN UID numbers found in OFAC's other data files are used throughout the XML file where applicable. The DISTINCT PARY FIXED REF number and the PROFILE ID number both make use of the SDN UID number. In Figure 10, you can see how the pre-existing UID of 10 is used multiple times in the Advanced XML file as a reference number in PROFILE and other elements. Because the Advanced XML file is much more flexible, it contains more detail and reference numbers.

```
<sdnEntry>
  <uid>10</uid>
  <lastName>ABASTECEDORA NAVAL Y INDUSTRIAL, S.A.</lastName>
```
Figure 9: Entity with UID 10. Taken from the current SDN XML File.

```
<DistinctParties>
  <DistinctParty FixedRef="10">
    <Comment/>
    <Profile ID="10" PartySubTypeID="3">
      <Identity ID="4370" FixedRef="10" Primary="true" False="false">
        <Alias FixedRef="10" AliasTypeID="1403" Primary="true" LowQuality="false">
          <DocumentedName ID="4370" FixedRef="10" DocNameStatusID="1">
            <DocumentedNamePart>
              <NamePartValue NamePartGroupID="6694" ScriptID="215" ScriptStatusID="1" Acronym="false">ABASTECEDORA NAVAL Y INDUSTRIAL, S.A.</NamePartValue>
            </DocumentedNamePart>
          </DocumentedName>
        </Alias>
```
Figure 10: Entity with UID 10. Taken from the new SDN Advanced Sanctions Data Model XML File.

As with most elements, DISTINCT PARTY has the possibility for COMMENT text. OFAC uses the COMMENT field for DISTINCT PARTIES to store data from the REMARKS element

6

in the current SDN XML file. As an example, this includes details such as "all offices worldwide" and any other narrative information about a sanctioned party.

5.1 Identities

The IDENTITY element contains data related to name parts. It contains the two sub-elements ALIAS and NAME PART GROUPS. The ALIAS element contains DOCUMENTED NAMES known to be used by a sanctioned party (See Figure 11).
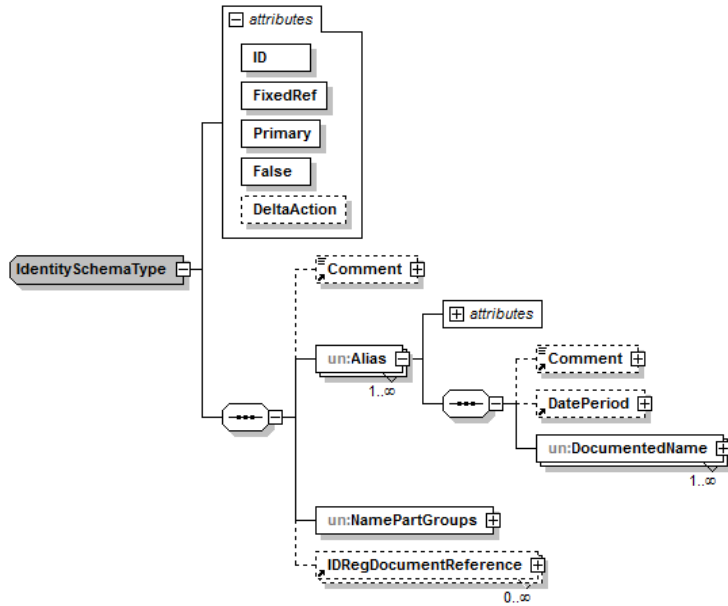

Figure 11: Diagram of the Identity section of the XML Schema

The DOCUMENTED NAME PARTS hold the NAME PART VALUES, which contain the text value of each name part together with associated meta-data, such as script (See Figure 12).
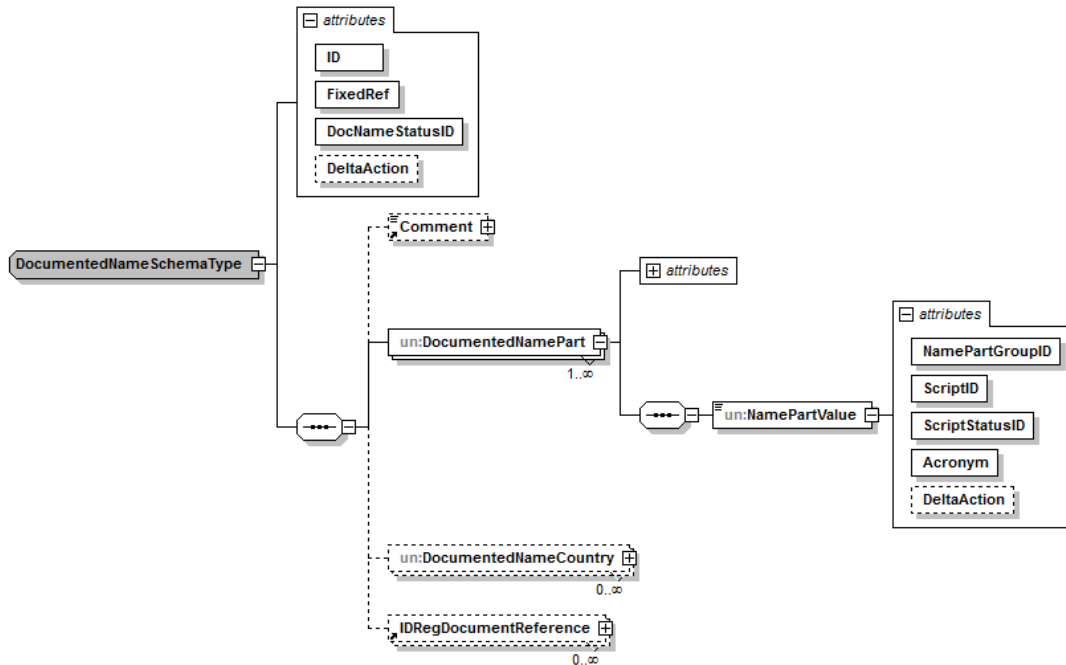
Figure 12: Diagram of the Documented Name section of the XML Schema

NAME PART VALUES support non-Latin scripts. Latin is the default script for all data in the file and for each NAME PART VALUE there will be a corresponding Latin translation. In general, each ALIAS contains a single DOCUMENTED NAME. In the case of names with non-Latin scripts, an ALIAS will have a default Latin DOCUMENTED NAME in addition to any number of non-Latin DOCUMENTED NAMES.

Each NAME PART VALUE has its own NAME PART GROUP. It is within NAME PART GROUP that you will find name part type information, such as "Last Name" or "First Name," for a given NAME PART (See Figure 13).
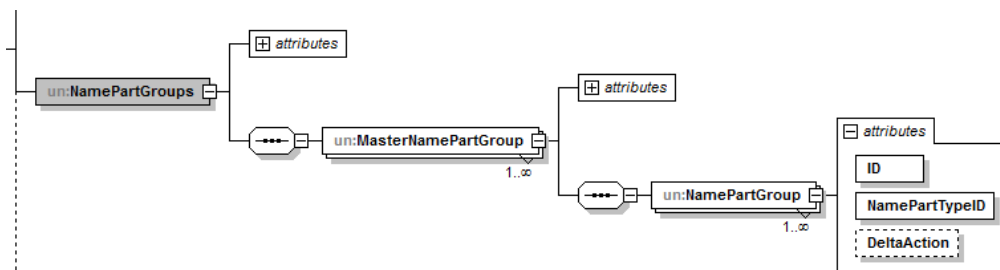

Figure 13: Diagram of the Name Part Group taken from the XML Schema

5.2 Features

FEATURES are information that describes a sanctioned party, such as citizenship or vessel flag. Each FEATURE contains a reference to one or more IDENTITIES with which it is associated. FEATURE information is grouped using the sub-element FEATURE VERSION to show different possible versions of each FEATURE (see Figure 14).

The FEATURE VERSION element contains sub-elements for VERSION LOCATIONS, DATE PERIODS and VERSION DETAILS that combine to describe the feature. For sanctioned parties that have address data associated with them, a FEATURE with VERSION LOCATION will contain a reference to the top-level element LOCATION (see section 3 above).
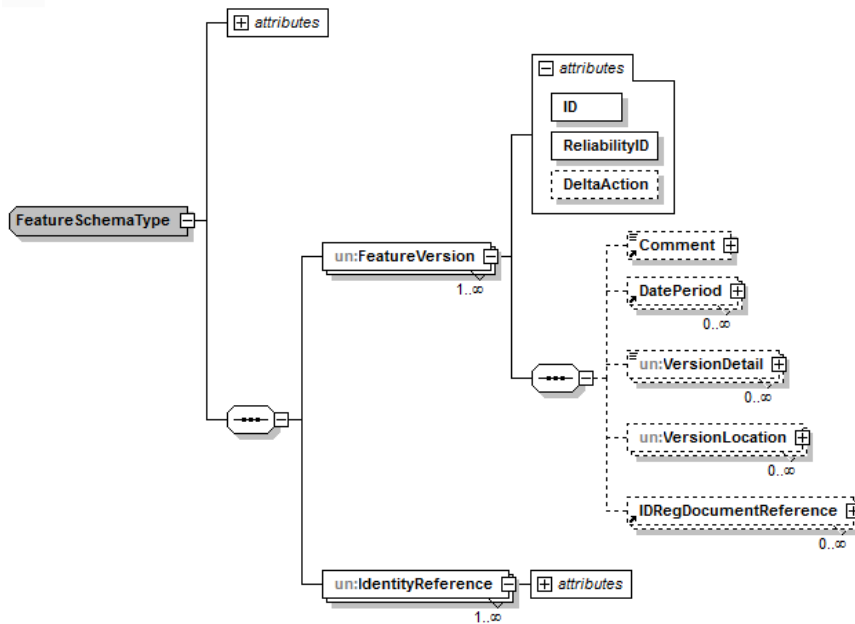

Figure 14: Diagram of the Feature section of the XML Schema

6. Profile Relationships

This element describes the relationships between sanctioned parties. The PROFILE of one sanctioned party is linked to the PROFILE of another sanctioned party. RELATION TYPE, such as "owned or controlled by", and RELATION QUALITY, such as high and low, are also provided (See Figure 15). This element contains back references to the element SANCTIONS ENTRY.
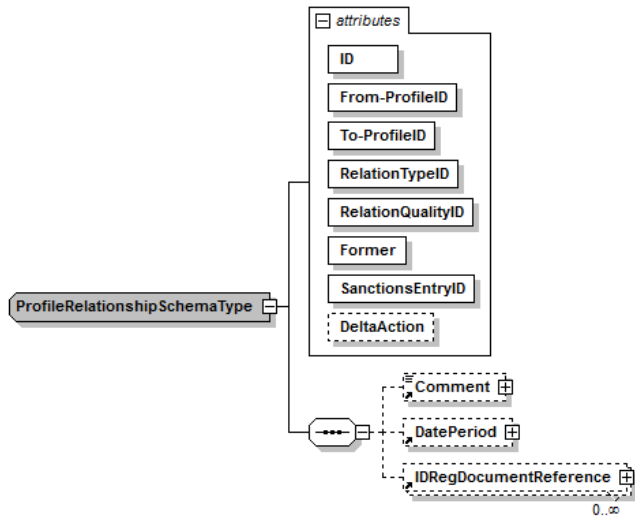
Figure 15: Diagram of the Profile Relationship section of the XML Schema

7. Sanctions Entries

The SANCTIONS ENTRY element contains administrative details about a sanctioned party. Examples of these details include the underlying legal authority for actions taken against a sanctioned party, the date of that action, and treatment information such as "Block.[1]" SANCTIONS ENTRIES are tied to a PROFILE. Each PROFILE relates directly to a single SDN. See the DISTINCT PARTY section above for more details on PROFILE. The SANCTIONS ENTRIES section of the XML file contains LIST ID (the SDN List) and any number of ENTRY EVENTS and SANCTIONS MEASURES (See Figure 16).

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[1] Generally speaking the SDN list is considered a blocking list, meaning targets featured on this list are blocked when a list user encounters a true hit during the screening process. However, there are certain exceptions to this rule. For example, please see this text from the human-readable version of the SDN list related to vessels.

"Except in limited circumstances, financial institutions are instructed to reject any funds transfer referencing a blocked vessel and must notify OFAC, preferably via facsimile with a copy of the payment instructions, that funds have been returned to the remitter due to the possible involvement of a blocked vessel in the underlying transaction. See 31 C.F.R. 501.604(b)(1). Financial institutions should contact OFAC's Compliance Outreach and Implementation Division for further instructions should the name of a blocked vessel appear in shipping documents presented under a letter of credit or if noticed in a documentary collection. Blocked vessels must themselves be physically blocked should they enter U.S. jurisdiction. Freight forwarders and shippers may not charter, book cargo on, or otherwise deal with blocked vessels."

Users should continue to use the program tags associated with each designation to determine the treatment of a true hit.
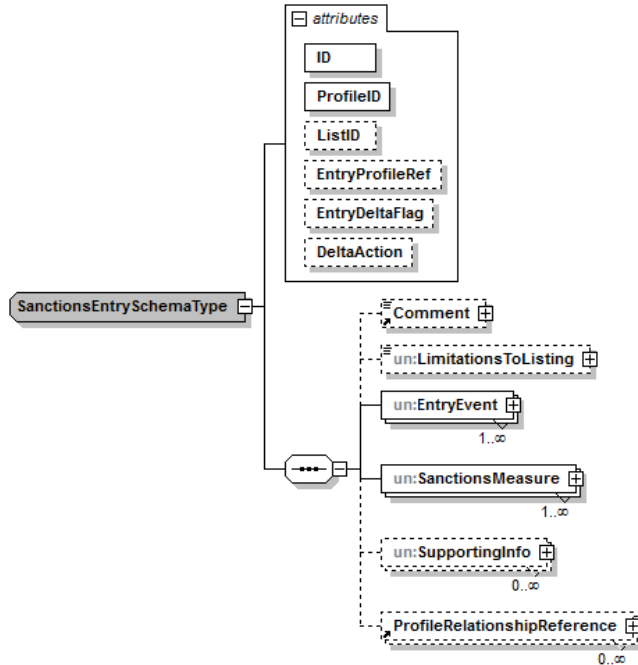
Figure 16: Diagram of the Sanctions Entry section of the XML Schema

The ENTRY EVENT section contains legal basis information. The date associated with the legal basis reflects the original publication date of that sanctioned party. In cases where legal basis information is unknown, there will still be an original publication date. Legal basis information is currently missing from many older SDN entries. OFAC plans to fill in this legal authority information over time.

The SANCTIONS MEASURES section contains SANCTIONS TYPE. For the SDN List, there are currently two types of SANCTIONS TYPE: "Block" and "Program." Every PROFILE will have "Block" and at least one "Program" associated with it.   SANCTION TYPEs with a value of "Program" will contain OFAC's program tag as comments text (See Figure 17). A list of program tags currently in use can be found in the REFERENCE VALUE SETS under SANCTIONS PROGRAM VALUES.

Figure 17: Example of Sanctions Type Taken from the XML Data File

8. Sanctions Entry Links

This element is not currently in use by OFAC. The SANCTIONS ENTRY LINKS top level element can be used to record SANCTIONS ENTRIES that have merged, split, or been replaced by one another.

11

C. New and Advanced Components

This section provides additional details on areas of the XML that are new or more advanced than previous OFAC data files.

1. Features and ID/Registration Documents

ID/Registration Documents refer to documents issued by an official source like a government or organization. The alpha numeric value for IDs is captured in the ID REGISTRATION NO element. FEATURES are much more flexible than IDs. The amount and type of information used by FEATURES to describe a sanctioned party can vary widely. For individuals, this can include items such as biometric data, place of birth, and nationality. For entities, it could be websites and email addresses. For vessels and aircraft, FEATURES capture things such as flags, owners, and model details.

FEATURES can also include information about OFAC sanctions programs and treatment. Currently, FEATURES are used on the SDN List to denote parties that are subject to secondary sanctions. FEATURES are also used to make determinations about certain sanctioned parties, such as their industry. OFAC plans to continue to expand its use of FEATURES to better describe sanctioned parties.

2. Scripts

The name and address elements of the XML fully support non-Latin scripts, specifically within the elements NAME PART VALUE and LOCATION PART. It is important to note that all non-Latin values given in the XML will always have a standard Latin version.

Every NAME PART VALUE displays a SCRIPT ID, even those in Latin. All names are displayed in the same format regardless of the script in which they are presented.

NAME PART VALUE and LOCATION PART are the only two elements that will contain non-Latin data. The remainder of the file will adhere to OFAC's traditional Latin character set.

3. Date Periods

Dates and date periods have been optimized for automated processing by using a highly structured model that is better able to store any kind of known or uncertain date or period in a consistent manner.
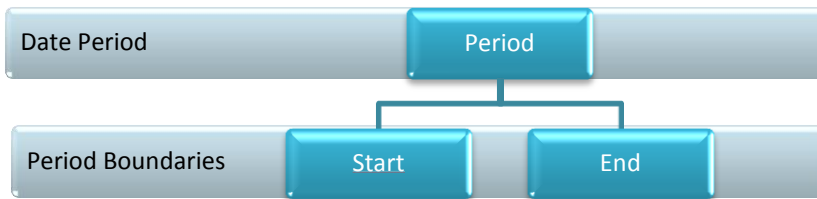
For each period, the start and end is defined. For single dates, the start and end are the same (i.e. a period of one day). Longer periods are typically defined by different start and end details. If the period being reflected is "since" a certain date, the end details will be omitted. Conversely, to reflect a period that ran "until" a certain date, the start details may be omitted.
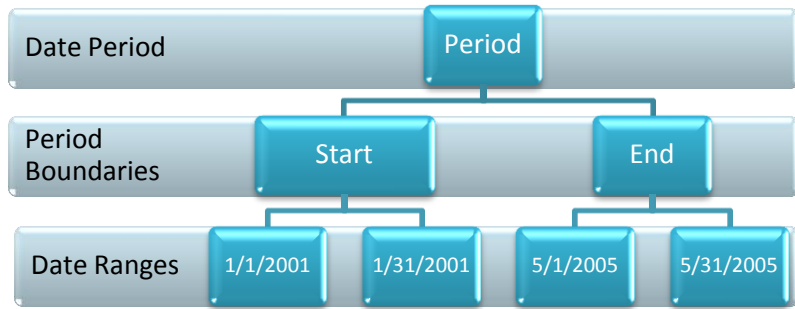
Rather than being defined as a set date, the start and end details for a period are themselves recorded using "From" and "To" dates, to allow a range of dates to be entered if the relevant date is only approximately known. If the start / end of a period is a known date, the "From" and "To" dates are the same; otherwise a range may be entered.
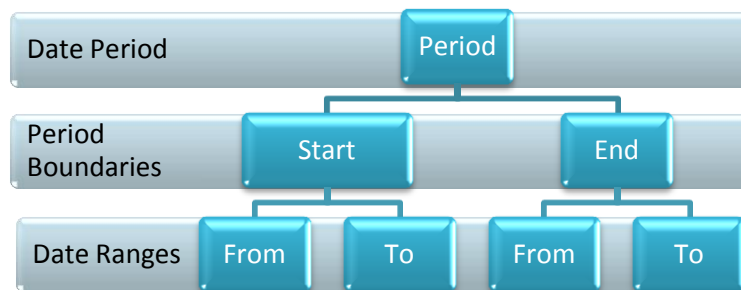
Using this model, the single date 8/9/1965 as shown on a PDF version of a sanctions list would be stored as follows in the structured data version:
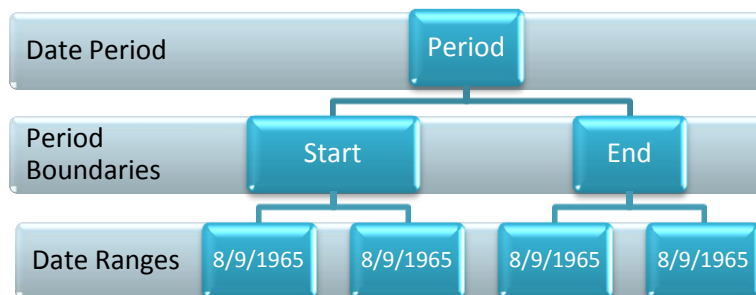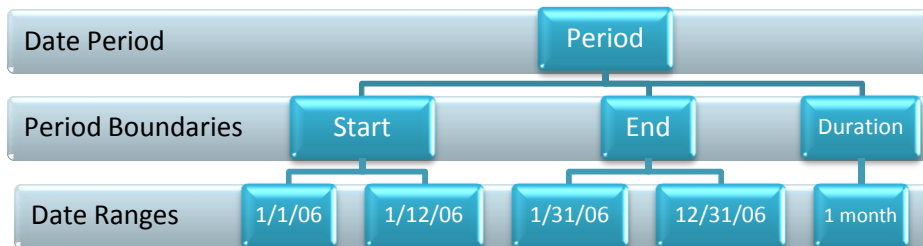

A period with an uncertain start and end date would be reflected differently. For example, to show that someone became leader of a particular group in January 2001 and ceased to hold this position in May 2005, the following period could be stored.

Date Period: Period

Period Boundaries: Start | End

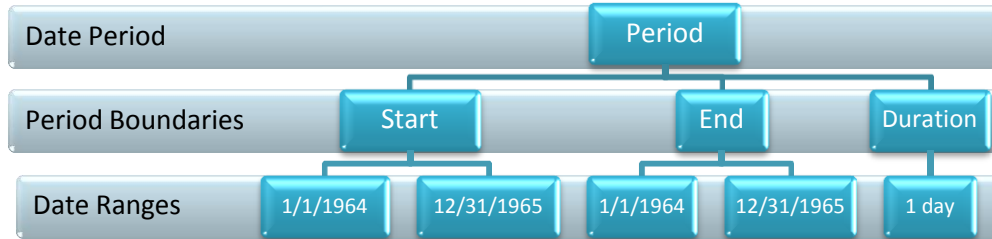**Date Ranges:** 1/1/2001 | 1/31/2001 | 5/1/2005 | 5/31/2005

More complex date periods can also be stored, for example, to record the fact that someone entered Pakistan between 3/4/2006 and 4/29/2006 and left again between 8/10/2007 and 1/11/2007

Date Period: Period

Period Boundaries: Start | End

Date Ranges: 3/4/06 | 4/29/06 | 8/10/07 | 1/11/07
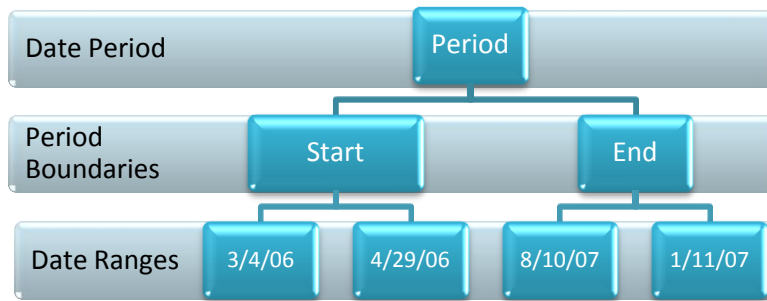
Where the length of the period is not clear from the start and end details, the duration of the period can be expressly defined. For example, to show that someone spent one month in Pakistan in 2006, the following data would be stored:

Date Period: Period

Period Boundaries: Start | End | Duration

Date Ranges: 1/1/06 | 1/12/06 | 1/31/06 | 12/31/06 | 1 month

The approximate date of birth of "1964-1965" would be stored as follows:

Date Period	Period				
Period Boundaries	Start		End		Duration
Date Ranges	1/1/1964	12/31/1965	1/1/1964	12/31/1965	1 day

In addition, any of the start, end or duration details may be marked as approximate (for example, if it is not certain that the relevant date falls in the range indicated). If required, the range can be set to a single date and flagged as "approximate". However, OFAC will be limiting the use of this functionality as it leaves the definition of "approximate" to be subjectively determined by each user, and does not allow for "approximate" to have different meanings in different contexts. This is similar to the existing "circa" values on the SDN list and OFAC has made every attempt to eliminate the use of approximate or circa dates.

All date information is stored with the day, month and year held in three separate fields, to allow the storage of partial dates. However, it is recommended that partial dates are stored with full dates using the range method described here unless insufficient information is available to specify a range (e.g. the year is unknown).

Where the missing part of an incomplete date can be estimated, the standard range system can be used, with the known parts flagged as "fixed". For example, if a date of birth is known to fall on the 15th of June, and based on the individual's approximate age it can be estimated that the year is between 1955 and 1965, the following details could be entered:

Date Period	Period					
Period Boundaries	Start		End		Duration	Fixed
Date Ranges	6/15/1955	6/15/1955	6/15/1965	6/15/1965	1 day	Month and Day