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Purpose of this document

In order to exercise appropriate pre grant review of international grants and to avoid criminal and civil penalties under the laws of the United States, the Wikimedia Foundation (WMF) grants compliance team¹ and the grants administrator will use this protocol to ensure that recipients of international grants are vetted against the OFAC SDN and other lists to demonstrate that the Wikimedia Foundation has exercised fiscal responsibility and that those responsible for receiving, executing and reporting on grants have been reviewed under Executive Order 13224, the USA Patriot Act, its reauthorization and related laws.

Process

Verification of participants in Wikimedia Foundation grants programs against the [OFAC SDN and other lists](#) may occur at two parts in the process:

For FDC applicants:

All organizations who have filed a letter of intent for the FDC process, have their Executive Director or their equivalent and their Board of Directors or Trustees vetted using the “Verifilter” software, which will check their names against [OFAC SDN and other lists](#) by a member of the grants compliance team before the submission of proposals to the FDC.

¹ *The grants compliance team consists of the Chief of Finance and Administration, the Executive Assistant to the CFA and the Grants Program Officer - Compliance.*

For persons or organizations awarded funding including successful FDC applicants:

Any person signing the grant agreement and any person with access to the bank account where grant funds are received or kept will be vetted using the “Verifilter” software which will check their names against [OFAC SDN and other lists](#). This will be done by either the grants administrator or a program officer using the requested identifying information.

Procedure for an OFAC Match

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