

Watchlist Match Protocol

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Created for the Audit Committee of the Wikimedia Foundation

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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

If there is a match with a name on the OFAC list, additional identifying information will be requested from the individual in question or the contact person on the application or letter of intent to see if the match is confirmed with the additional identifying information. If the match is confirmed, the Wikimedia Foundation will contact the OFAC to assist with verification of the match. If the match is not confirmed an email will be sent to the individual or organization confirming the match has been cleared, with a copy of the email added to the grant file and with notification to the grant team.

Procedure for a match on another list

If there is a match on a list other than an OFAC list, additional identifying information will be requested from the individual in question or the contact person on the proposal form or letter of intent to see if the match is confirmed with the additional identifying information. If the match is confirmed, the Wikimedia Foundation will contact the creator of the list to assist with verification of the match. If the match is not confirmed an email will be sent to the individual or organization confirming the match has been cleared, with a copy of the email added to the grant file and with notification to the grant team.

Hold on funding

If a potential grantee or awarded grantee is found to be a match on either the OFAC SDN list or another list then they will not be eligible to request or receive funding from any Wikimedia Grants Program until the match is resolved to the satisfaction of the grants compliance team.