

Guidance on Filing the Annual Report of Blocked Property

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

Updates

- On June 21, 2019, OFAC published an amendment to the Reporting, Procedures and Penalties Regulations, 31 CFR part 501 (RPPR). [Click here](#) to view the latest version of the RPPR in the Federal Register.
- Effective for ARBPs on blocked property held as of June 30, 2019, OFAC replaced the previous version of [Form TDF 90-22.50](#), with an editable spreadsheet that includes all required fields and should reduce the time needed to complete the report. See 31 C.F.R. § 501.603 for detailed reporting requirements.

General Guidance

- 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.
- The term “blocked property” only applies to property that is blocked pursuant to OFAC regulations and property that is blocked pursuant to a recent Executive Order that has not yet been implemented in the regulations. Property that has been unblocked by general or specific license, but was not returned to the owner, is not blocked property and should not be reported to OFAC in the ARBP.
- 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. §§ [560.305](#), [560.427\(b\)](#), [560.517](#).
- Starting with the 2020 ARBP, do not aggregate multiple properties into a single listing in Part B of the report.¹
- Ensure that the total quantity of blocked property records reported in Part A, Section 3, equals the total quantity of blocked assets listed in Part B.
- Email the completed ARBP to OFACReport@treasury.gov by September 30 with a clearly labeled subject line (e.g., “Bank ABC’s 2019 ARBP Submission”).

Tips for completing Part A - U.S. Person Holding Blocked Property

- Enter the name and address of the person holding the blocked property in Part A, Section (1).

Tips for completing Part B - Property Reported

- Please review Part A of Form TDF 90-22.50 for instructions on completing Part B of the excel form. Below is additional information regarding certain data fields in Part B.

Date of Blocking

- Please enter the date of blocking in the following format MM/DD/YYYY (e.g., 02/15/2019)

Value (USD)

¹ For the 2019 ARBP, OFAC strongly recommends that all submitters of ARBPs who maintain blocked funds in omnibus accounts disaggregate each blocked asset contained within these accounts in Part B. However, the requirement to list all blocked assets held in such accounts is effective for the 2020 ARBP, which is due no later than September 30, 2020.

- The actual, or if unknown, the estimated value of the property in U.S. Dollars as of June 30.
- Transactions or property blocked in foreign currencies must be reported in U.S. Dollars with the foreign currency amount and notional exchange rate in *Additional Description of the Property* field.
- If the blocked property represents an outstanding loan, a credit card receivable, or other property with a negative balance, the amount blocked should be reported as \$0.00 (zero) with the balance owed on the blocked asset noted in the *Additional Description of the Property* field.

Legal Authority or Authorities

- Identify the Part of Title 31 of the Code of Federal Regulations under which each asset is blocked. Do not include legal authorities related to inactive or terminated sanctions programs (e.g., Part 537, Part 543, Part 593).
- Please report the program tag(s) or regulation(s) associated with the blocked person. For a list of sanctions program tags, please refer to OFAC's [Program Tag Definitions page](#).
- The term "SDN" is generic and cannot be used to identify the legal authority for blocking property.

Sanctions Target

- Please report the associated sanctions target(s) whose property is blocked, such as a Specially Designated National or other blocked person. If the sanctions target is not evident, please include a narrative description of the interest(s) of the target(s) in the transaction; if there is no target or the target is not known, include a reference to the relevant written communication from OFAC pursuant to which the blocking action was taken.
- While OFAC strongly encourages submitters of the ARBP to include the sanctions target associated with each property reported, it is not required until the annual report due no later than September 30, 2020.

Asset Type

- Examples of an asset type include but are not limited to a wire transfer, money transfer, bank account, brokerage account, certificate of deposit, check, claim, collateral, credit card, deposits, letter of credit, standby letters of credit, insurance, prepaid card, real estate, safe deposit, savings, secure debt, secure equity, stocks, dividends, tangible property, and trade documents.

Account Type

- Examples of an account type include but are not limited to checking, demand deposit, certificate of deposit, money market, savings, stocks/dividends, time deposit, custody, cash, contract, sundry account, and escrow.

Location

- Include the city and country where the property is being held in the columns titled *Location: City* and *Location: Country*.

New Item

- "Please indicate "Y" in rows involving new blocked property that was not previously reported in the ARBP. If this property was reported on the prior year's annual report, please indicate "N."

For additional information regarding the ARBP or reporting requirements, please contact our Toll-Free Hotline at 1-800-540-6322 or send an email to 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:

OFFICE OF FOREIGN ASSETS CONTROL
U.S. Department of the Treasury
1500 Pennsylvania Avenue, N.W.
Washington, D.C. 20220
www.treasury.gov/ofac
(202) 622-2490