

Independent Sanctions Screening Module Testing

Below are the initial observations based on independent testing and are intended to highlight priority areas for enhancement before deeper or expanded validation. Overall, baseline sanctions detection is functioning. However, several gaps in alias handling, name normalization and hit-level transparency introduce false-negative and auditability risks that should be addressed.

As an immediate recommendation, it would be helpful to enhance the tool to provide visibility into hit-level details and the specific alias names that trigger alerts. Without this information, it is difficult to independently validate why an alert was generated, which limits the effectiveness of the current review. This capability is a core requirement for sanctions screening solutions, as it materially improves explainability, supports effective alert disposition and reduces operational and audit risk.

Observations	
1	Difference in match counts detected between Watchman and OFAC list. Samples: “ABU BAKR AL-BAGHDADI” generated 1 potential match in Watchman and 4 in the OFAC list. “AL SHABAAB” generated 4 potential matches in Watchman and 11 in the OFAC list. The SDN hit was successfully identified and alerted with a high score. The differences in match counts likely reflect internal alias handling and do not impact baseline sanctions detection under exact-name conditions. However, the application currently does not provide sufficient match-level detail or alias visibility to confirm which specific records or aliases triggered the alert independently. This limits transparency and makes it difficult to fully validate match accuracy.
2	Screening results indicate sensitivity to name order for records. Sample: “AL-JASIM, Muhammad Husayn” Vs. “Muhammad Husayn AL-JASIM” This behavior indicates a potential false-negative risk where sanctioned individuals may not be detected if name components are presented in a different order.
3	The application does not provide sufficient identifying attributes (such as date of birth, place of birth, nationality, location or identification numbers) to support effective alert disposition. The absence of this information limits the ability to mitigate or clear potential false positives. Providing visibility into matched aliases and underlying list records would strengthen explainability, support auditability and improve confidence in screening outcomes.
4	Screening using certain alias-only inputs (e.g., “AL-MALIZI,” an OFAC-listed alias of Abu Sayyaf) did not generate the same match in Watchman. This indicates a potential false-negative risk, where sanctioned individuals/entities may not be detected correctly when screened using alternate or less common names.

	<p>The screenshot shows the 'Lookup' interface. The search bar contains 'AL-MALIZI'. The dropdown for 'Program' shows 'All' selected, with '561-Related', 'BALKANS', and 'BALKANS-E014033' listed below it. The 'Minimum Name Score' slider is set to 100. The results section shows 'Lookup Results: 1 Found' with a single entry: 'Name: AL-MALIZI, Abu Sayyaf'.</p>	<p>The screenshot shows the main search interface. The search bar contains 'AL-MALIZI'. The dropdown for 'Entity Type (optional)' shows 'All Types' selected. The checkbox for 'Enable ScoreTrace' is checked. The 'Run Search' button is blue. The results section shows 'Results: 1 matches' with a single entry: 'AL-MALIKI, Shabib Lazem - Match: 88.0%' and 'Type: PERSON Source: US_OFAC'.</p>
5	<p>When screening using an alias name, the application returns a hit against the primary sanctioned entity/individual, but does not display the specific alias that triggered the match. As a result, it is not possible to confirm whether the alert was generated due to an exact alias match or broader name similarity, limiting the ability to independently validate match accuracy.</p> <p>The screenshot shows the main search interface. The search bar contains 'Muhammad IBN AL-HUSAYN'. The dropdown for 'Entity Type (optional)' shows 'All Types' selected. The checkbox for 'Enable ScoreTrace' is checked. The 'Run Search' button is blue. The results section shows 'Results: 1 matches' with a single entry: 'AG ALHOUSSINI, Houka Houka - Match: 100.0%' and 'Type: PERSON Source: US_OFAC'.</p> <p>The screenshot shows the main search interface. The search bar contains 'Muhammad Yunis Ahmad'. The dropdown for 'Entity Type (optional)' shows 'All Types' selected. The checkbox for 'Enable ScoreTrace' is checked. The 'Run Search' button is blue. The results section shows 'Results: 1 matches' with a single entry: 'AHMAD, Muhammad Yunis - Match: 100.0%' and 'Type: PERSON Source: US_OFAC'.</p>	