

Guidance Note

on AML/CFT obligations in relation to payment accounts with basic features

A Guidance Note issued by the FIAU to assist credit institutions to comply with their obligations under the prevention of money laundering and funding of terrorism regulations when offering payment accounts with basic features under the Credit Institutions and Financial Institutions (Payment Accounts) Regulations

Issued: 15th October 2018 Updated: 25th September 2024



Introduction

The Credit Institutions and Financial Institutions (Payment Accounts) Regulations¹ (PAR) transposed into Maltese law the requirements of the Payment Accounts Directive². The regulations lay down rules concerning:

- The transparency and comparability of fees charged to consumers on their payment accounts held in Malta.
- The switching of payment accounts within Malta.
- The facilitating of cross-border payment account opening for consumers.

Additionally, they create a framework containing rules and conditions according to which Malta is required to guarantee a right for consumers to open and use payment accounts with basic features in Malta.

Having access to a payment account with basic features is an essential aspect of financial inclusion as it allows people to store money and carry out transactions to meet day-to-day needs. It also helps vulnerable groups of people to integrate in society. Conversely, the unjustified exclusion from such access can have severe social and economic consequences for those who are vulnerable and at risk of being exploited.

Part 4³ of the PAR provides the right for consumers legally resident in Malta or in another Member State to open and use a payment account with basic features in Malta. In granting this right, the regulations dictate that consumers are not to be discriminated against because of their nationality, place of residence, financial circumstances, or other grounds such as those referred to in Article 21 of the Charter.

The PAR also ensure that the granting of this right does not compromise credit institutions' ability to comply with their AML/CFT obligations⁴. The appropriate application of the risk-based approach is crucial to retain a fair balance between what is required under the PAR and AML/CFT compliance. This is also emphasised in the Guidelines issued by the EBA on policies and controls for the effective management of ML/TF risks when providing access to financial services.

Considering the above, the Financial Intelligence Analysis Unit (FIAU) is issuing this Guidance Note to set out how AML/CFT obligations, particularly those relating to the verification of identity, can be met by credit institutions that are obliged to offer a payment account with basic features in terms of Part 4 of the PAR. It also sets out the level of ongoing monitoring to be undertaken depending on the ML/FT risk posed by the business relationship.

Credit institutions should note that with effect from the date of publication, this updated Guidance Note will repeal and replace the FIAU "Guidance Note on AML/CFT Obligations in Relation to Payment Accounts with Basic Features" issued on 15 October 2018.

¹ Legal Notice 411 of 2016 as amended by Legal Notice 324 and 354 of 2018 and Legal Notice 33 of 2024

² Directive 2014/92/EU of the European Parliament and of the Council of 23 July 2014 on the comparability of fees related to payment accounts, payment accounts witching and access to payment accounts with basic features

³ Regulations 17 and 19 of the PAR

⁴ Regulation 1(7) of the PAR

Identification and Verification



General Overview

1. The Prevention of Money Laundering and Funding of Terrorism Regulations (PMLFTR) require subject persons, including credit institutions, to identify their customers and verify their identity through independent and reliable sources. Identification consists of collecting the personal details referred to in Section 4.3.1 (i) of the Implementing Procedures Part I, while applying the risk-based approach to vary the extent of identification depending on the case at hand.

By way of example, in low-risk scenarios, subject persons can limit themselves to collecting the official full name, date of birth, and permanent residential address of the customer without needing to collect the individual's place of birth, nationality, and identification document number.

2. The risk-based approach also allows for the extent and/or timing of the verification measures to be varied based on risk. In low-risk scenarios,

a subject person can vary the timing and/or the extent of any identity verification measures. Therefore, it is possible to verify the identity when pre-determined trigger events occur (e.g. pre-set transaction thresholds). Similarly, in any such scenario, it is equally acceptable to use documents of varying quality to meet verification of identity obligations.

It is necessary to remember that verification does not only entail determining that a given person exists, but that the person requesting the services or products is the person he declares himself to be. The risk-based approach should always be applied when carrying out verification of the identity of the customer. Depending on the risk assessed, it may be necessary to take additional measures to verify the client's identity.

3. In terms of Regulation 8(5) of the PMLFTR, the inability to carry out the identification and

verification of the identity of the customer should result in the refusal or termination of the business relationship and the consideration as to whether there are grounds to submit a Suspicious Transaction Report (STR) to the FIAU based on Regulation 15(3) of the PMLFTR. This is also reflected in the PAR⁵.

Notwithstanding this, credit institutions need to consider exceptional circumstances surrounding the customer's inability to produce the standard verification documentation, and if these exist, to adopt an approach that compensates for the difficulties that customers may face in providing the standard evidence of identity. This approach emanates from Section 4.3.1.1 (ii) of the Implementing Procedures Part I and is further explained below.

- 4. Consumers legally resident in Malta or another Member State can open and use a payment account with basic features. The following categories of individuals are also considered as consumers legally resident in Malta or another Member State:
 - a. consumers with no fixed address
 - b. persons who may be granted any status under the International Protection Act⁶ or any other national legislation
 - c. consumers who have not been granted a residence permit but whose expulsion is impossible for legal or factual reasons
 - d. consumers whose status is not covered above, but whose expulsion is impossible for legal or factual reasons

5. The following paragraphs provide detailed guidance to credit institutions on how to identify and verify the identity of the customers listed above when providing them with a payment account with basic features⁷.

Consumers with no fixed address

- 6. One of the personal details required for identification purposes is the customer's permanent residential address. However, consumers with no fixed address may not be able to provide credit institutions with their permanent residential address.
- 7. The Implementing Procedures Part I provide guidance on how to carry out verification in various exceptional scenarios, including where a customer does not have a fixed residential address (either permanent or temporary). These include customers who are homeless, members of the travelling community or persons residing on yachts. In these situations, subject persons may rely on other mitigating measures different from the standard verification requirements to ascertain their identity or some aspects of their identity. Various alternative measures which may apply in these scenarios may be found in Section 4.3.1.1 (ii) of the Implementing Procedures Part I.

Applicants for International Protection:

- **8.** Credit institutions may also have to provide a payment account with basic features to persons who enjoy any of the following statuses:
 - · asylum seekers
 - refugees8
 - beneficiaries of subsidiary protection⁹
 - beneficiaries of other forms of humanitarian or international protection

⁵ Vide Regulation 22 of the PAR.

⁶ Cap. 420 of the Laws of Malta

⁷ Reference should be made to Regulation 25 of the PAR for a detailed list of services and transactions that a payment account with basic features should provide.

⁸ Article 8 of the International Protection Act (Cap. 420)

⁹ Article 17 of the International Protection Act (Cap. 420)

- · stateless persons
- · failed or refused asylum seekers
- 9. The FIAU understands there may be questions about which identification documents credit institutions may accept for identity verification purposes of customers holding one of the statuses above. As a rule, identity verification must be based on documents, data, or information acquired from a reliable and independent source.

The FIAU has always considered government-issued documents containing photographic evidence of identity as fulfilling the necessary criteria, and as the main source to verify an individual's identity. If any of the above individuals can produce a valid official identity document, the credit institutions can verify the customer's details using this document. Unless the credit institution has any reason to believe that the document is forged or has otherwise been tampered with, it would be considered to have met its legal obligations.

- **10.** While it is unlikely that these individuals will be able to produce any identification document issued by the authorities of their country of origin, the FIAU considers any such document to be equivalent to a government issued document and therefore, to be a sufficiently reliable and independent source of information for verification purposes. Caution should however be exercised as to the authenticity and veracity of these documents¹⁰.
- by the Maltese authorities, the FIAU wishes to draw the attention of credit institutions to the Identity Card and Other Identity Documents Act¹¹. This Act sets out what identification documents are to be issued to anyone legally residing in Malta, including anyone granted refugee status or subsidiary protection, as well as to asylum seekers and failed or refused

- asylum seekers. Therefore, credit institutions may verify the identity of this category of customers by referring to such documents.
- 12. To further assist credit institutions in determining which locally issued identification documents are acceptable for verification purposes, the FIAU has included templates of these identification documents in Annex I.

Individuals who cannot be Expelled

- 13. The PAR also require credit institutions to provide a payment account with basic features to all those individuals who, for legal or factual circumstances, cannot be returned to their country of origin. In these circumstances, credit institutions must note that the obligation to identify and verify the identity of these customers must still be met.
- 14. Individuals who cannot be expelled from Malta are issued an identity document by the Malta Police, a template of which can be found in Figures 9 to 12 of this Guidance Note. Credit institutions would still be considered to have met their obligation to verify the identity of their customers when they do so based on this document.

EEA Residents

15. Any EEA resident can request to open a payment account with basic features. Where a credit institution is willing to accede to this request, it will also have to consider how it will verify the customer's identity. As already highlighted, government-issued documents containing photographic evidence of identity are the main source to verify an individual's identity. However, credit institutions may not always be familiar with the identity document customers present when requesting this product.

¹⁰ Reference should also be made to the FIAU's <u>Guidance Note on Mononymous Natural Persons</u> for further guidance relating to the AML/ CFT measures subject persons need to take when required to identify and verify the identity of natural persons who have only one name listed on their verification document.

¹¹ Cap. 258 of the Laws of Malta.

- 16. In this regard, credit institutions may wish to refer to the following resource which contains templates of various identity documents issued by governments within the EEA. This may be useful to determine whether an identification document presented by a EEA resident can be relied upon for identity verification purposes.
- 17. When using the above resource, credit institutions should nonetheless bear in mind that the templates made available may not always reflect the latest identification documents made available by government authorities within the EEA.

On-Going Monitoring

- 18. The PMLFTR require subject persons, including credit institutions, to perform ongoing monitoring of their business relationships on a risk-sensitive basis. This includes ensuring that documentation is kept up to date and that any activity carried out during the business relationship is properly monitored to detect any unusual or suspicious activity. To this end, credit institutions must collect sufficient information to construct an adequate profile of the customer concerned.
- 19. Credit institutions should understand the purpose of the customer's request to open a payment account with basic features (e.g. savings, receiving social security benefits or government grants/ allowances, receiving salary/wages, etc.), and the level of activity that is expected to be transacted through the account.

This includes:

- an estimate of the amounts to be deposited in the account
- the expected source of funds
- the number of expected incoming or outgoing transactions
- the destination of any remittances to be affected

20. Credit institutions may also draw on their experience and held data to draw up a peer group profile against which to compare activity taking place on payment accounts with basic features.

The following are some red flags that may be considered:

• Structured cash deposits:

Structured cash deposits were recorded in the bank account despite the client declaring that salary payments would be made directly from their employer. The structured activity might also include having low amounts deposited regularly in small tranches to avoid triggering any thresholds set by the credit institution.

Excess turnover:

The turnover would not be according to the expected turnover declared by the account holder during onboarding. For instance, the account holder claims that his annual income is estimated at €20,000 but the turnover recorded in the account exceeds €150,000 within a few months.

Rapid and consecutive transfers towards online payment service providers:

Abnormal and unexpected cash deposits would be transferred within days if not hours through online payment service providers.

Using multiple online payment service providers:

The account holder might use various online payment service providers and split the transactional activity to avoid detection due to a high volume of activity.

Failure to establish a legitimate source of funds:

Account holders subject to source of funds clarifications would fail to provide satisfactory documentary evidence indicating a legitimate source of the deposits being affected. For example, explanations by the account holder would be generic indicating that the source

derives from friends and/or co-habitants and that the outgoing transfer relates to funds being sent as support to their families.

Evasive behaviour:

Account holders who tend to be evasive and provide unsuitable information when requested to update their profile and to establish a legitimate transactional rationale.

• Unknown beneficiaries:

The account holder might state that the cash deposited followed by outgoing transfers through online payment service providers would represent a transfer of funds to their family, without appropriate documentation to support the transfer and an indication of the actual beneficiary of the funds.

- Connections with high-risk countries and countries, areas and/or entities known to be associated with terrorist groups:
 - Cash withdrawals from Automatic Teller Machines ('ATMs') in high-risk countries.
 - Fund transfers that are seemingly without any legitimate or reasonable explanation to or from areas where terrorist groups are active or nearby, or to areas where terrorist groups are known to enjoy support.
 - Fund transfers to or from entities known to be sympathetic to or have links with terrorist groups.
- Fund transfers to or from sanctioned entities:

Fund transfers to or from entities subject to international or EU sanctions.

- 21. Considering the red flags which account holders of a basic payment account may present, there is also an increased risk that the account holder would utilise the account to act as a money mule. This is due to the facility of depositing funds through cash and affecting online payments through a card which provides the facility of easing the layering process and the movement of funds.
- 22. Using the information collected from the customer and/or any data and information already in their possession, credit institutions should have the tools to detect any unusual activity on payment accounts with basic features.
- 23. Credit institutions are reminded that any unusual activity must be questioned and considered when assessing whether the customer risk assessment and client profile require updating. If they give rise to a suspicion of ML/FT, the activity and/or transaction in question must be reported to the FIAU. Credit institutions are reminded that any such report cannot be disclosed to the customer.
- 24. The level of ongoing monitoring to be conducted must reflect the level of risk that the customer presents and should be higher in high-risk situations. Even when no triggering events occur, business relationships must be reviewed from time to time to ensure that there have been no changes warranting a review of a customer's risk and business profile. The same applies to document updating.

Conclusion

Credit institutions are reminded that applying CDD on a risk-sensitive basis should result in appropriate AML/CFT controls according to the level and nature of ML/FT risk the institutions are exposed to. To the greatest extent possible, a similar approach should be adopted where the level and nature of risks arising from providing a payment account with basic features are equivalent or similar to the risks arising from providing similar products to customers other than those referred to in the PAR.

Some individuals who may be entitled to open a payment account with basic features may use cash. In determining the risk associated with cash use, credit institutions must not limit themselves to the presence of cash but also note the amounts involved and the frequency with which cash deposits are made. Any risk assessment must be holistic and consider all the relevant risk indicators. For further guidance, credit institutions are to refer to the <u>Guidance Note</u> issued by the FIAU which deals with the Use of Cash in the Banking Sector.

In determining what AML/CFT controls to impose on payment accounts with basic features, credit institutions are also invited to take into consideration the Opinion of the European Banking Authority on the application of customer due diligence measures to customers who are asylum seekers from higher-risk third countries or territories (EBA-Op-2016-07)

Any identification document templates provided in this Guidance Note have been sourced by the FIAU from the authorities responsible for their issuance and are intended for guidance purposes only. Subject persons are accountable for being updated with any changes in this regard and should not expect any notifications from the FIAU or any other responsible entity.

Any questions or clarifications about the contents of this Guidance Note may be addressed to the FIAU at queries@fiaumalta.org.

Annex I

Template Identification Documents



The following are templates of identification documents issued by the Maltese authorities which credit institutions may use for verification of identity purposes:

1. ASYLUM SEEKERS

The documents included under Figures 1 to 3 are templates of the documents issued by the International Protection Agency and the International Protection Appeals Tribunal to anyone who seeks international protection. The documents are issued at different stages of the decision-making process as follows:

- **Figure 1** Certificate issued once an asylum seeker makes an initial application for protection.
- Figure 2 Certificate issued after an asylum seeker makes another application for international protection with the International Protection Agency.
- Figure 3 Certificate issued to an asylum seeker having a pending appeal with the International Protection Appeals Tribunal

whereby he is requesting the revocation of a previous recommendation of the Refugee Commissioner.

It is important to note that these documents are only valid until the date indicated unless renewed. Moreover, the documents' validity depends on it having the following:

- i. the signature of the Officer who prepared the document
- ii. the signature of the Chief Executive Officer or another Officer authorised to sign this document on their behalf
- iii. the signature of the applicant
- iv. the facial image of the applicant
- v. the stamp of the International Protection Agency

Fig. 1 Certificate issued once an applicant makes an initial application for protection.



ASYLUM SEEKER'S DOCUMENT

This is to certify that the bearer of this certificate is an <u>ASYLUM SEEKER</u> after having made an application for international protection with the International Protection Agency.

2

Refcom No. 00000 This document expires on 02/01/2025

and is not valid unless renewed.

Prepared by 00000

CEO (IPA)

The asylum seeker is therefore to be accorded all the protection and rights as per Maltese Law. The asylum seeker on the other hand, is binding himself/herself to respect Maltese Law and all duties as expected of him/her.

The asylum seeker must always **inform this Agency** of any change of address or telephone numbers. It is imperative that this Agency is always in a position of making contact with the asylum seeker.

This certificate must be renewed on the day of expiry. Failure to renew this document on the date of expiry may lead to the implicit withdrawal of the application for international protection in accordance with Article 13 of Subsidiary Legislation 420.07.

The certificate is not valid after the date of expiry indicated above and is valid only in its original form.

Personal details given are as declared by the asylum seeker and not official. Any query as to the holder's status in Malta should be directed to the International Protection Agency.

Mr/Mrs SURNAME, NAME
Date of birth 01/01/2000

Place of birth GUEDIAWAYE, DAKAR REGION, SENEGAL, SENEGAL

Nationality SENEGAL

Residing VILLAGE GATE, TRIQ VICTOR DENARO, NAXXAR

 Telephone number
 00000000

 Police No
 00000

 Refcom No
 00000

 Application for international protection made
 13/04/2024

Farner House, Trig Nazzjonali, Hammun, HMR 9011

+356 21 255 257 Info@pagownt

ipa.gov.mt

Fig. 2 Certificate issued after an applicant makes a subsequent application for international protection with the International Protection Agency.



ASYLUM SEEKER'S DOCUMENT

This is to certify that the bearer of this certificate is an <u>ASYLUM SEEKER</u> after having made a subsequent application for international protection with the International Protection Agency.



Refcom No. 00000

This document expires on 05/09/2023 and is not valid unless renewed.

Prepared by ococo

CEO (IPA)

The asylum seeker is therefore to be accorded all the protection and rights as per Maltese Law. The asylum seeker on the other hand, is binding himself/herself to respect Maltese Law and all duties as expected of him/her.

The asylum seeker must always inform this Agency of any change of address or telephone numbers. It is imperative that this Agency is always in a position of making contact with the asylum seeker.

This certificate must be renewed on the day of expiry. Failure to renew this document on the date of expiry may lead to the implicit withdrawal of the subsequent application for international protection in accordance with Article 13 of Subsidiary Legislation 420.07

The certificate is not valid after the date of expiry indicated above and is valid only in its original form.

Personal details given are as declared by the asylum seeker and not official. Any query as to the holder's status in Malta should be directed to the International Protection Agency.

Mr/Mrs	SURNAME, NAME	
Date of birth	01/01/2000	
Place of birth	RASDOVLOVKA, DONSTEK, UKRAINE	
Nationality	UKRAINE	
Residing	SALINA, BLK O, FLT O, TRIQ VICTOR DENARO, NAXXAR	
Telephone number	000000000	
Police No	00000	
Refcom No	om No 00000	
Subsequent Application made on	21/06/2024	

Fafner House, Inc. Nazzjonal , Hamrun, HMA 9071 | +856 21235 257

ofcoips.gov.mt

lpa.gov.mt

Fig. 3 Certificate issued to an asylum seeker with a pending appeal with the International Protection Appeals Tribunal, whereby a request for the revocation of a previous recommendation of the Refugee Commissioner is being made.





International Protection Appeals Tribunal 15, 1st Floor, City Gate Buildings, Ordnance Street, Valletta. VLT 1020

ASYLUM SEEKER'S DOCUMENT

(THIS CERTIFICATE IS VALID ONLY IN ITS ORIGINAL FORM)

This is to certify that the bearer of this certificate is an ASYLUM SEEKER and has a pending appearance. International Protection Appeals Tribunal whereby he is requesting the revocation of a previous recommendation of the Refugee Commissioner, and therefore requesting protection through recognition of Refugee Status/Subsidiary Protection. This certificate is to be renewed on the day of expiry and will under no circumstance be valid beyond such

Name & Surname

IPAT Number XXXXX **IPA Number** XXXXX Police Number XXX-XXX Issue Date DD-MM-YYYY **Expiry Date** DD-MM-YYYY

International Protection Appeals Tribunal Officer

It is thus declared that no final decision according to law has yet been delivered regarding the status of this appellant. Appellant is therefore to be accorded all the projection and rights as per Maltese Law. Appellant on the other hand is binding himself, herself to respect Maltese Law and all duties as expected of him/her. Appellant must always inform this Office of any change of address and/or telephone numbers. It is imperative that this Office is always in a position of making contact with appellant. Appellant is also informed that the sittings of the Board relative to his/her appeal will be held in camera, unless the Board deems it appropriate to hold an oral hearing.

Personal Details

Name	XXXXX XXXXXXX		
Date of Birth	DD-MM-YYYY		
Place of Birth	XXXXXXX		
Nationality	XXXXXX		
Address	Address Line 1, Address Line 2, Address Line3		
E-Mail Address	XXXXX@XXXX.com		
Telephone No	XXXXXXXX		
Appealed On	DD-MM-YYYY		

International Protection Appeals Tribunal

I declare that I have read this document and that the content has been duly explained by an International Protection Appeals Tribunal Officer.

Appellant's Signature

International Protection Appeals Tribunal Officer

Email: ipat@gov.mt

2. Refugees and Other Individuals Enjoying Subsidiary Protection, Temporary Humanitarian Protection or Temporary Protection



Individuals who have had their application for asylum accepted and have been awarded any of the statuses below are issued with protection certificates as shown in Figures 4 to 7 below:

	Status	Field on the Front "Type of Permit"	Validity Period
1.	Refugee	Refugee Status	Three (3) Years
2.	Subsidiary Protection	Subsidiary Protection	Three (3) Years
3.	Temporary Humanitarian Protection	Temporary Humanitarian Protection	One (1) Year
4.	Temporary Protection	Temporary Protection	Until 4th March 2026

Fig. 4 Refugee Status Certificate



Fig. 5 Subsidiary Protection Certificate

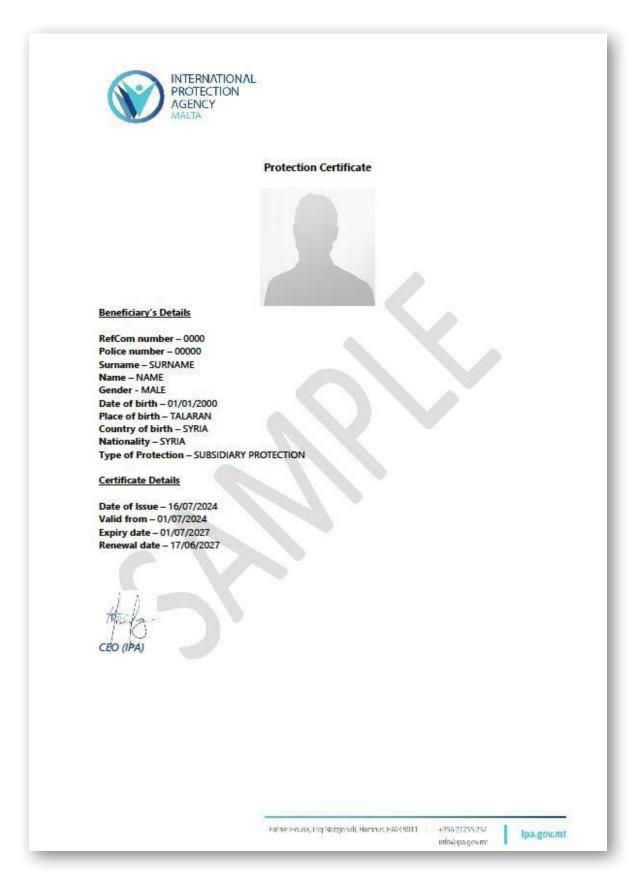


Fig. 6 Temporary Humanitarian Protection Certificate

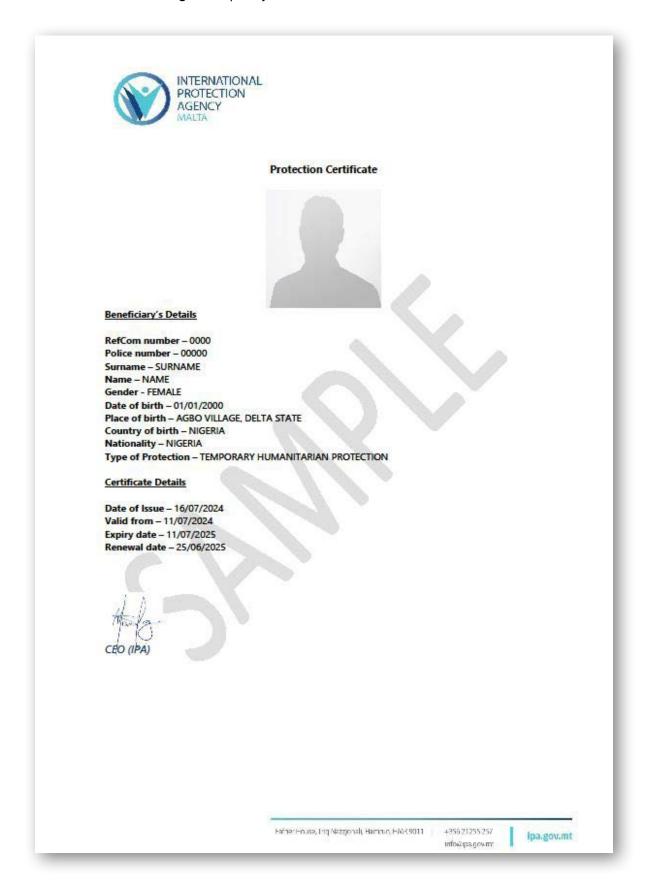
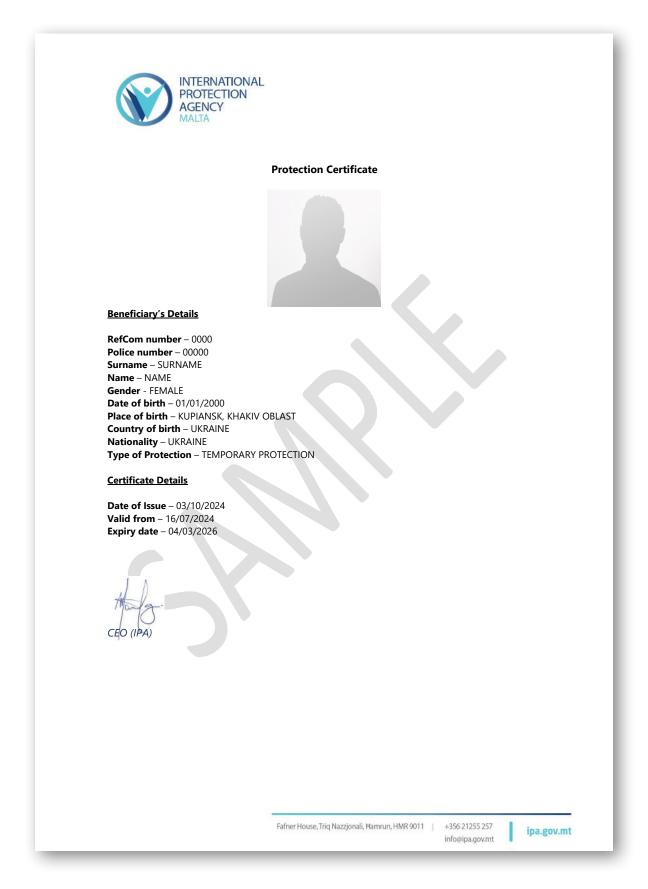


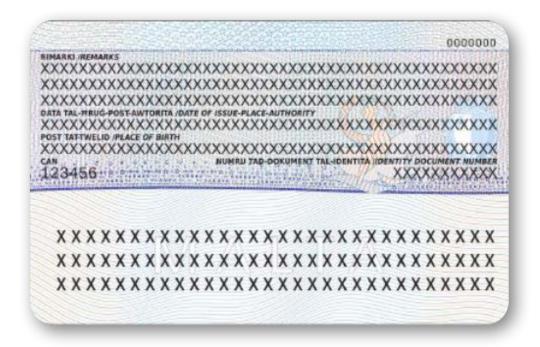
Fig. 7 Temporary Protection Certificate



Where an individual holding any of the statuses referred to above holds a residence permit, a copy of the residence permit may also be collected for verification purposes.

Fig. 8 Residence Permit issued by IDENTITÀ to Third Country Nationals





3. Individuals Who Cannot Be Repatriated

The Malta Police issues an identification document to all those individuals who cannot be expelled and repatriated. It is important to note that, though this document has a period of validity that can be extended, it no longer remains valid as soon as the immigration authorities can proceed with the individual's

repatriation. Moreover, the extension of its validity is not uniform but depends on the holder's particular circumstances.

Credit institutions should therefore exercise caution when presented with this identification document for identity verification purposes.

Fig. 9 Identification Document issued by the Malta Police - front



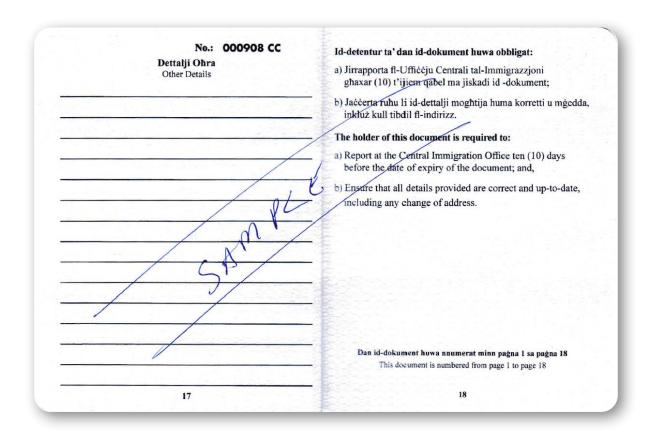
Dettalji kif moghtija mid-detentur REPUBBLIKA TA' MALTA Details as given by holder Republic of Malta Kunjom Surname 000908 CC Isem Name Post u data tat-twelid Place and date of birth Nazzjonalità Nationality Mahrug minn: Ufficcju tal-Immigrazzjoni Kwartieri Generali tal-Pulizija, Furjana Firma tad-detentur Holder's Signature Issuing Authority: Immigration Office, Police Headquarters, Floriana Numru Personali: Data tal-hrug Personal number: Date of issue Numru tal-faxxiklu: Timbru tal-Ufficcju/Firma File number: Office stamp/Signature

Fig. 10 Identification Document issued by the Malta Police - details page

Fig. 11 Identification Document issued by the Malta Police – dependents' details and renewal pages

No.: 000908 Persuni Dipendenti Dependent Persons			No.: 000908 CC TIĠDID TAD-DOKUMENT Document Renewals
Isem Name	Data tat-twelid Date of birth	Relazzjoni Relationship	Data tat-tigdid: Renewal date:
			Validu sa: Valid until:
			Status tad-detentur tad-dokument: Status of holder of the document:
			Uffièjal inkarigat mit-tigdid tad-dokument: Officer renewing document:
			Timbru tal-Ufficjal: Stamp of Officer:
			Rimarki: Remarks:
			Data tat-tiģdīd: Renewal date:
			Validu sa: Valid until:
			Status tad-detentur tad-dokument: Status of holder of the document:
		22222	Ufficjal inkarigat mit-tigdid tad-dokument: Officer renewing document:
			Timbru tal-Ufficjal: Stamp of Officer:
			Rimarki: Remarks:
-	3 2 2 2 2		

Fig. 12 Identification Document issued by the Malta Police – back page



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Questions on this document may be sent to queries@fiaumalta.org

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