



PRE-EXAMINATION (OFFSITE) BSA REQUEST LIST

- Name and title of individual(s) responsible for monitoring Bank Secrecy Act/anti-money laundering (AML) activities and handling Section 314(a) information requests.
- Copy of management's AML risk assessment of all major business lines, products, and services.
- Completed BSA Officer's Questionnaire.
- Copy of most recent Board approved BSA/AML policy and procedures.
- Copy of most recent Board approved Customer Identification Program.
- Copy of policy and procedures relating to Office of Foreign Asset Control (OFAC) sanctions.
- Copy of policy and procedures relating to Suspicious Activity Report (SAR) reporting and monitoring requirements.
- Copy of procedures/program to comply with the USA PATRIOT Act Section 314(a) information requests.
- Copy of most recent independent audit results for BSA/AML/OFAC compliance (internal and/or external sources), including management's responses.
- Copy of latest listing of accounts without taxpayer identification numbers (TINs).

EXAMINATION (ONSITE) BSA REQUEST LIST

An examination of your Bank Secrecy Act (BSA) compliance program will be conducted. Please have the following information ready on the first morning the examination begins onsite, or note which items do not apply to your bank. Provide copies of information **only** in those instances where specifically requested.

- Copy of BSA/AML/OFAC training schedule with dates, attendees, and topics.
- Designation of Exempt Person Forms for current exemptions.
- Exemption files containing documentation supporting exemptions (cash history, etc.).
- Bank-specific correspondence received from the Treasury (Financial Crimes Enforcement Network, Detroit Computing Center, Office of Foreign Asset Control, etc.) since the previous BSA examination.
- File of correspondence requesting taxpayer identification numbers (TINs).
- Log or other method used to retain required information on the purchase of monetary instruments for cash in amounts of \$3,000 to \$10,000.
- Training file (for example, materials used for training since the previous BSA examination).
- Record retention schedule and procedural guidelines.
- File of Forms 4789 Currency Transaction Reports (CTRs).
- File of Forms 4790 Report of International Transportation of Currency or Monetary Instruments (CMIR).
- File of Forms 90-22.1 for interest in foreign bank accounts.
- File of SARs.
- Logs reflecting cash shipped to and received from the Federal Reserve Bank, correspondent banks, or between branches for the previous six months.
- Correspondence file with federal law enforcement authorities concerning disposition of accounts reported for suspicious activity.

- ___ Reports used by the bank to detect suspicious transactions, such as the suspected kiting report, demand deposit activity report, large cash transaction report, currency aggregation report, and a report of loans secured by cash collateral.
- ___ Logs or other method reflecting incoming and outgoing wire transfers.
- ___ Description of the types and volume of wire transfer activities conducted by the bank. Include methods of payment accepted for such transfers and also acceptable remitters (for example, accountholders versus non-accountholders).
- ___ Listing of all payable through demand deposit relationships with foreign financial institutions.
- ___ If applicable, contract/agreement with foreign financial institutions that have payable through accounts.
- ___ If applicable, policies concerning payable through accounts (may be in BSA Policy).
- ___ If applicable, policies and procedures for private banking accounts.
- ___ A description of the types of transactions received via "pouch," (for example, common courier or messenger) from abroad and the bank's process for monitoring such activity.
- ___ Logs used to identify transactions received via "pouch."
- ___ If applicable, documentation to evidence compliance with 31 CFR Section 103.177 and 103.185 (for foreign correspondent accounts).
- ___ A listing of all loans secured by cash collateral which have defaulted since the previous BSA examination, including those charged off.
- ___ Contracts with financial institutions and with third parties that perform all or any part of the bank's Customer Identification Program (CIP).