 Date Completed: 12/16/16

Bank Secrecy Act Questionnaire

**Auditor: «**baname»

**Interviewee Name and Title:**

***Training***

* Which employees are required to complete BSA training on an annual basis?
* How is BSA training administered to employees? In person or Online?
  + If the training is provided online, what courses are the employees required to take and what is the minimum passing score?

* Who is responsible for monitoring training attendance?

***Branch Visits***

* Any branches you would like us to visit?

***CTRS***

* Does the Institution’s core system trigger an alert when cash transactions in a single day aggregate over $10,000?

* + If yes, are transactions aggregated by TIN?

* Who is responsible for initially completing the information for the CTR?
* Who is responsible for completing the review of the CTR prior to submission?
* Are the CTR’s compared to a Daily cash report for accuracy?
* How are CTRs prepared and submitted to FinCEN? (Directly through FinCEN website, through the Institution’s automated software?)
* Does the Institution have any armored car relationships?

***Daily Large Cash Transaction Reports***

* Who is responsible for reviewing the report on a daily basis?
* What does the report include?
  + Does the report aggregate cash transactions by TIN, account number, etc.?
* Are ATM deposits and withdrawals included within the report?
  + Does the report aggregate the ATM transactions for each customer?
* How are currency exchanges monitored?

***Exemptions***

* Does the Institution grant exemptions?
  + Did the Institution revoke any exemptions during the scope period?
* Who can recommend a customer for exemption?
* Who is responsible for reviewing the customer’s eligibility?
* If the Bank determines that the customer is no longer eligible for exemption, how is this documented?

***SARs – Suspicious Activity Monitoring***

* How does the Bank conduct it’s suspicious activity monitoring? Manual? Automated? Or Both?
  + If automated, what system does the Bank use?
* What is the time frame that the automated system captures suspicious activity? (3 months, rolling 6 months, etc.)
* What types of transactions do the parameters monitor?
* Does the Bank have an individual who has received formal training for the automated software?

***Monetary Instrument Currency Purchase Logs***

* What types of monetary instruments does the Bank sell?
* Does the Bank sell monetary instruments to non customers?
* Does the Bank require the customer to deposit and then immediately withdraw cash when purchasing a monetary instrument?
  + If yes, is all required information still recorded?
* How does the Bank record the required information for monetary instrument purchases?

***Wire Transfers:***

* Does the Bank perform wire transfers for non-customers?
* Are customers required to deposit funds into their account prior to processing a wire transfer?
* What methods will the Bank accept wire transfer requests?

***§ 314(a) requests***

* What is the process for performing the searches (manual or automatic)?
* Does the search include closed accounts for at least 12 months?

***314(b)***

* Does the Bank participate in § 314(b) information sharing?
* Does the Bank have written procedures?

***Enhanced Due Diligence***

* Does the Bank require completion of a new business worksheet at the time of account opening?
* Does the Bank collect the NAICS code for each customer?

***Remote Deposit Capture***

* Is there a specific type of customer that can have the service or is it available to all (i.e. only business customers)?
* What company provides the RDC services to the Bank?

* What is the enrollment process?

* What is the approval process?