PUBLIC

Note: This case study reflects general institutional experience. Details have been obfuscated or composited to preserve anonymity and confidentiality.

Product: AML Surveillance and Case Management Systems Challenge: Recovering from Transaction Monitoring Misfires

## **Summary**

Across prior institutional reviews, our team has observed a recurring pattern: case management systems often lack clear subject matter ownership and alignment with institutional risk. Implementation intent is frequently lost in translation between vendors, internal stakeholders, and regulatory interpretation, leading to needless risk exposure.

We've also seen organizations treat their case management system as the sole vector for financial crime compliance, rather than embedding it within a broader, risk-responsive program. Anchor Accord brings strategic foresight and clarity to help recalibrate these systems for both safety and performance.

#### **Critical Issues Identified**

Risk Domain	Symptom	Impact
Implementation Planning	Poor pre-deployment controls, triage methodology, or rule testing	Unpredictable alert volume; system becomes unmanageable; Alert backlogs grow
Governance	Proposals to bulk-close live alerts without triage	Risk of regulatory breach and reputational damage
Change Management	No rule documentation, or opaque change processes	Audit exposure and unclear system behavior
Operational Reporting	No tactical reporting for investigative support	Analysts lacked insight into trends and risk prioritization

### **Strategy**

- Aligned system behavior with risk appetite and regulatory expectations
- Reviewed rulesets to retain only high-value monitoring logic
- Built a scalable triage methodology to manage and reduce alert backlogs without external staffing
- Developed interim tactical reports to support investigators during system refinement
- Established long-term change management protocols with audit-ready documentation
- Trained operational and executive teams on governance and investigative obligations



### Results

Before	After
Overly aggressive alert systems causing burnout	Risk-prioritized ruleset with volume control and supporting documentation
No triage plan or investigative workflow	Structured backlog reduction plan with clear escalation procedures
Leadership unaware of bulk- action risk exposure	Executive alignment around regulatory obligations and audit risk
No tactical support reporting	Active reporting framework for investigative support and rule refinement
Zero documentation of system changes	End-to-end rule change governance with audit trail and rationale logging

# **Strategic Observations**

- Alert volume isn't a KPI—it's a signal-to-noise ratio that must be actively managed
- Governance gaps during implementation become audit liabilities downstream
- Executive misunderstandings of investigative obligations can multiply systemic risk
- Untested monitoring logic gives the illusion of coverage and creates blind spots that no one's watching