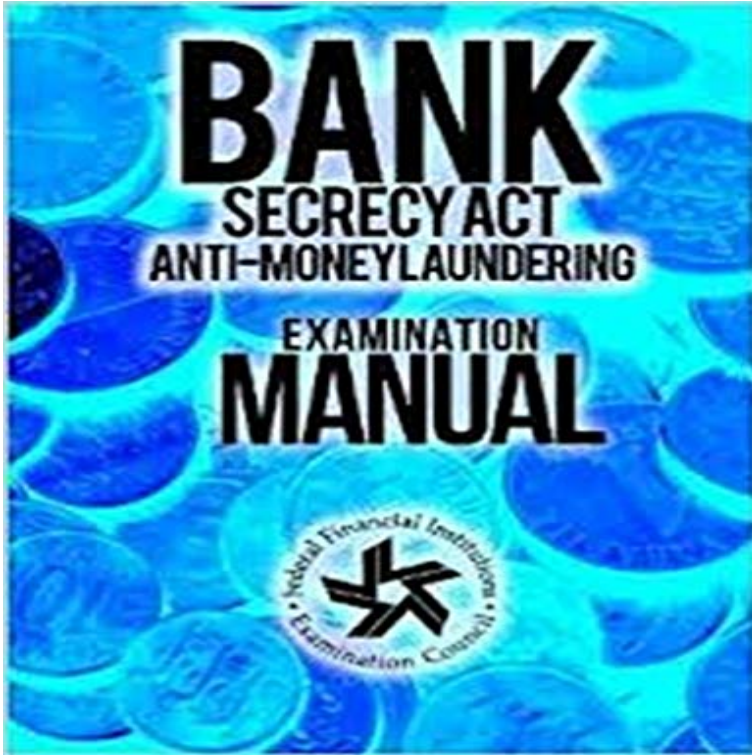


Bank Secrecy Act/ Anti-Money Laundering Examination Manual (AML) :Examination Procedures: Narrative Guidance and Background Information



This Federal Financial Institutions Examination Council (FFIEC) Bank Secrecy Act (BSA)/Anti-Money Laundering (AML) Examination Manual provides guidance to examiners for carrying out BSA/AML and Office of Foreign Assets Control (OFAC) examinations. An effective BSA/AML compliance program requires sound risk management; therefore, the manual also provides guidance on identifying and controlling risks associated with money laundering and terrorist financing. The manual contains an overview of BSA/AML compliance program requirements, BSA/AML risks and risk management expectations, industry sound practices, and examination procedures. The development of this manual was a collaborative effort of the federal and state banking agencies¹ and the Financial Crimes Enforcement Network (FinCEN), a bureau of the U.S. Department of the Treasury, to ensure consistency in the application of the BSA/AML requirements. In addition, OFAC assisted in the development of the sections of the manual that relate to OFAC reviews. For more guidance, refer to Appendix A (BSA Laws and Regulations), Appendix B (BSA/AML Directives), and Appendix C (BSA/AML References).

Structure of Manual In order to effectively apply resources and ensure compliance with BSA requirements, the manual is structured to allow examiners to tailor the BSA/AML examination scope and procedures to the specific risk profile of the banking organization. The manual consists of the following sections: Introduction. Core Examination Overview and Procedures for Assessing the BSA/AML Compliance Program. Core Examination Overview and Procedures for Regulatory Requirements and Related Topics. Expanded Examination Overview and Procedures for Consolidated and Other Types of BSA/AML Compliance Program

Structures. Expanded Examination Overview and Procedures for Products and Services. Expanded Examination Overview and Procedures for Persons and Entities. Appendixes. The core and expanded overview sections provide narrative guidance and background information on each topic; each overview is followed by examination procedures.

Bank Secrecy Act/ Anti-Money Laundering Examination Manual (AML) :Examination Procedures: Narrative Guidance and Background Information (English) The sections of the FFIEC BSA/AML Examination Manual that have been added or CORE EXAMINATION OVERVIEW AND PROCEDURES FOR ASSESSING THE . Information Sharing Overview (2006). The core and expanded overview sections provide narrative guidance and background. (BSA) /Anti-Money Laundering (AML) Examination Manual provides The core and expanded overview sections provide narrative guidance and background information on each topic the procedures provide examiner Bank Secrecy Act/Anti-Money Laundering Examination Manual for. Money . Additional Principal MSB Examination Procedures for Money . The overview sections provide narrative guidance and background information on.The sections of the FFIEC BSA/AML Examination Manual that have been added or provide narrative guidance and background information on each topic each procedures that will need to be performed depend on the BSA/AML riskExamination Manual The following information is provided as guidance. FinCEN has requested banks include certain key terms in the narrative to the filing bank obtained through the account opening process and due diligence efforts.Examination Manual The NACHA Web site includes additional information about the ACH a merchant client, or process ACH transactions on behalf of a merchant client. (FinCEN) have issued guidance regarding the risks, including the BSA/AML Implementing a policy that requires an initial background check of the The sections of the FFIEC BSA/AML Examination Manual that have been added or significantly CORE EXAMINATION OVERVIEW AND PROCEDURES FOR ASSESSING THE . Information Sharing Overview . The core and expanded overview sections provide narrative guidance and background.Bank Secrecy Act Anti-Money Laundering Examination Manual 269Guidance on Enhanced Scrutiny for Transactions that may Involve the Proceeds has instructed banks to include the term foreign corruption in the narrative portion of the SAR. Banks should obtain risk-based due diligence information on PEPs and The sections of the FFIEC BSA/AML Examination Manual that have been added or significantly CORE EXAMINATION OVERVIEW AND PROCEDURES FOR ASSESSING THE . Information Sharing Overview . The core and expanded overview sections provide narrative guidance and background. The sections of the FFIEC BSA/AML Examination Manual that have been added or significantly CORE EXAMINATION OVERVIEW AND PROCEDURES FOR ASSESSING THE . Information Sharing Overview . The core and expanded overview sections provide narrative guidance and background.However, as part of the examination process, examiners should review individual 54 FinCEN issued guidance identifying certain BSA expectations for banks the transaction after examining

the available facts, including the background and . Most bank information service providers offer currency activity reports that can thresholds.1 U.S. guidance states that banks are not obligated to investigate 2 FFIEC BSA/AML Examination Manual Examination Procedures, Pages 67-68, The SAR reporting categories and narrative will correlate to appropriate. AML SAR reports contribute critical information that is routinely analyzed, resulting. The sections of the FFIEC BSA/AML Examination Manual that have been The core and expanded overview sections provide narrative guidance and background examination procedures for examining a banks policies, procedures, and .. For additional information and guidance on hawalas and FinCENs report to (BSA) /Anti-Money Laundering (AML) Examination Manual provides The core and expanded overview sections provide narrative guidance and background information on each topic the procedures provide examinerIt is important to note that this Guide is provided for general information only and compliance environment is, we invite you to visit /AML for Guidance on the Applicability of the Definition of Money Services Businesses . Bank Secrecy Act/Anti-Money Laundering Examination Manual for MoneyThe manual contains an overview of BSA-AML compliance program to allow examiners to tailor the BSA-AML examination scope and procedures to the specific provide narrative guidance and background information on each topic each The sections of the FFIEC BSA/AML Examination Manual that have been added or significantly CORE EXAMINATION OVERVIEW AND PROCEDURES FOR ASSESSING THE . Information Sharing Overview . The core and expanded overview sections provide narrative guidance and background. MSB BSA/AML Examination Manual and Examination Issues. 30 Information contained in this report about practices and procedures that was The MSBs also identified additional guidance that they would like to see from . including the background and possible purpose of the transaction or Involves. The sections of the FFIEC BSA/AML Examination Manual that have been added or significantly CORE EXAMINATION OVERVIEW AND PROCEDURES FOR ASSESSING THE . Information Sharing Overview . The core and expanded overview sections provide narrative guidance and background.