

BSA Audit Questionnaire

Credit Union

As of 12/31/19

	<u>Yes</u>	<u>No</u>
1. Does the credit union have a written BSA compliance policy?	___	___
2. Was the compliance program approved by the Board and approval noted in the Board Minutes?	___	___
a. Date of Approval: _____		
3. Does the written BSA compliance program provide for the following:		
a. A system of internal controls to ensure ongoing compliance?	___	___
b. Independent testing for compliance to be conducted internally or externally?	___	___
c. Designation of a qualified individuals(s) responsible for coordinating and monitoring day-today compliance?	___	___
d. Training for appropriate personnel?	___	___
4. Does the credit union's compliance program include procedural guidelines for the detection, prevention and reporting of suspicious transactions related to money laundering activities?	___	___
5. Does the credit union's program reach all operations of the institution that are affected by BSA (retail, trust, private banking, commercial, wire transfer, teller, discount brokerage, etc.)?	___	___

	<u>Yes</u>	<u>No</u>
6. Does the credit union file a CTR for each deposit, withdrawal, exchange of currency or other payment or transfer, by, through or to the credit union, which involves more that \$10,000 in one business day?	___	___
7. Does the credit union file an appropriate form for each shipment of currency or other monetary instrument(s) in excess of \$10,000 out of/into the U.S. on behalf of the institution (not its customers), except via common carrier, by, or to the institution?	___	___
8. Does the credit union maintain all records pertaining to BSA for five years?	___	___
9. Has the Board, Committee, and Staff had BSA training during the audit period?	___	___
Date of Training: _____		
10. For each exempted account, has the credit union filed an appropriate form within 30 days of the first exempted transaction?	___	___
11. Does the institution have a monitoring system for each exempted non-listed business and payroll customer that is reasonably designed to detect suspicious activities?	___	___
12. Does the institution have an adequate system (training & procedures, perhaps an automated system as well) for detecting single or multiple transactions in one business day the exceeded \$10,000?	___	___
13. If a payment order is made in person, does the institution verify the identity of the person placing the order and retain a record of the type of ID reviewed and the ID number?	___	___

	<u>Yes</u>	<u>No</u>
14. Does the credit union have written policies and procedures in place for complying with OFAC laws and regulations?	___	___
15. Does the credit union maintain a current listing of prohibited countries, entities, and individuals?	___	___
16. Are new accounts compared to the OFAC listings prior to opening?	___	___
17. Are beneficiaries on new accounts compared to the OFAC listing prior to the account being opened?	___	___
18. Are beneficiaries on accounts ran against the OFAC listing prior to funds being disbursed to the beneficiary?	___	___
19. Are third party vendor checked against the OFAC listing prior to check being disbursed for services rendered?	___	___
20. Are established accounts regularly compared to current OFAC listings?	___	___
a. How often: _____		
21. Are wire transfers regularly compared to current OFAC lists by the Credit Union? (Not by a third party)	___	___
22. Has the credit union opened any business accounts after May 11, 2018?	___	___
23. Has the Credit Union had any blocked or rejected transaction under OFAC?	___	___
24. Name of Credit Union		
25. Name of Employee completing this Questionnaire		
26. Auditor completing your audit		
27. By typing your name in the box below, you are certifying that the answers given are correct to the best of your knowledge.		