International Transportation of Currency or Monetary Instruments Reporting Examination and Testing Procedures

Objective: *Assess the bank’s compliance with the BSA regulatory requirements for the reporting of international shipments of currency or monetary instruments.*

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| **Procedures** | **Comments** |
| 1. Determine whether the bank has (or has caused to be) physically transported, mailed, or shipped currency or other monetary instruments in excess of $10,000, at one time, into or out of the United States, or whether the bank has received currency or other monetary instruments in excess of $10,000, at one time, that has been physically transported, mailed, or shipped into the United States.
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| 1. Review the bank’s policies, procedures, and processes for identifying reportable international shipments of currency or monetary instruments and for filing a Report of International Transportation of Currency or Monetary Instruments (CMIR) to determine whether they meet the BSA regulatory requirements for CMIR reporting.
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| 1. Determine whether the bank’s policies, procedures, and processes (internal controls) are designed to assure ongoing compliance with CMIR filing requirements and are commensurate with the bank’s risk profile.
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| 1. Select a sample of reportable transactions and filed CMIRs and determine whether:
* CMIRs are filed in accordance with FinCEN form instructions.
* CMIRs filed contain accurate and complete information.
* CMIRs are filed at the time of entry into the United States or at the time of departure, mailing, or shipping from or into the United States.
* Any discrepancies exist between the bank’s records of CMIRs and the CMIRs reflected in the BSA reporting database.
* The bank has taken corrective action when errors are identified.
* The bank retains copies (electronic format or paper copies) of CMIRs for five years from the date of the report.
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| 1. On the basis of examination and testing procedures completed, form a conclusion about the adequacy of policies, procedures, and processes the bank has developed to meet BSA regulatory requirements associated with CMIRs.
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