Developing the BSA/AML Examination Plan

Examination Procedures

Objective: *Based on the bank’s risk profile, develop and document a BSA/AML examination plan that includes the BSA/AML examination and testing procedures to be completed.*

| **Procedure** | **Comments** |
| --- | --- |
| 1. Based on the review of relevant examination documents, in conjunction with the review of the bank’s BSA/AML risk assessment, develop and document an initial BSA/AML examination plan. At a minimum, the plan should address:
* The risk profile of the bank.
* The scope and adequacy of the bank’s BSA/AML independent testing and whether the independent testing can be leveraged to assist in the assessment of the bank’s BSA/AML compliance program and the bank’s compliance with BSA regulatory requirements.
* The examination staffing needs, including any subject matter expertise (BSA and non-BSA).
* The scope of the BSA/AML examination, including the examination and testing procedures necessary to assess the adequacy of the bank’s BSA/AML compliance program, the bank’s compliance with BSA regulatory requirements, and the bank’s adherence to, and the appropriateness of, its policies, procedures, and processes.
 |  |
| 1. Based on the review of relevant examination information and the bank’s risk profile, determine the examination and testing procedures to be completed. Determine the request letter items that are necessary to complete those examination and testing procedures. Examples of request letter items are detailed in [*Appendix H - Request Letter Items*](https://bsaaml.ffiec.gov/manual/Appendices/08). Examiners are expected to review the request letter items provided by the bank prior to their onsite work.
 |  |