BSA/AML Training

Examination Procedures

Objective: *Determine whether the bank has developed a BSA/AML training program and delivered training to appropriate personnel.*

| **Procedure** | **Comments** |
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| 1. Determine whether all personnel whose duties require knowledge of the BSA are included in the training program, that the BSA compliance officer and BSA compliance staff have received periodic training that is relevant and appropriate, and that the board of directors receives appropriate training that may include changes or new developments in the BSA.
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| 1. Determine whether the bank’s training program materials address:
* The importance that the board of directors and senior management place on ongoing education, training, employee accountability, and compliance.
* Results of previous findings of noncompliance with internal policies and regulatory requirements, if applicable.
* An overview of the purposes of the BSA and its regulatory requirements, supervisory guidance, and the bank’s internal policies, procedures, and processes.
* Different forms of ML/TF and other illicit financial activity risks as they relate to identification and examples of suspicious activity.
* Information tailored to specific risks of individual business lines or operational units.
* Information on current developments and changes to the BSA regulatory requirements.
* Adequate training for any agents who are responsible for conducting BSA-related functions on behalf of the bank.
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| 1. Determine whether the bank maintains documentation of the dates of training sessions and training and testing materials (if testing is used by the bank). Documentation should include attendance records and any failures of personnel to take the requisite training in a timely manner, as well as any corrective actions taken to address such failures.
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