**reporting obligations on foreign bank relationships with iranian-linked financial institutions examination and testing Procedures**

**Objective:** *Assess the bank’s compliance with the Bank Secrecy Act (BSA) regulatory reporting requirements under the provisions relating to the Comprehensive Iran Sanctions, Accountability, and Divestment Act (CISADA).*

| **Procedure** | **Comments** |
| --- | --- |
| 1. Review the bank’s policies, procedures, and processes relative to reporting obligations on foreign bank relationships relating to the Comprehensive Iran Sanctions, Accountability, and Divestment Act (CISADA). Policies, procedures, and processes should cover the following:
* Responding to Financial Crime Enforcement Network’s (FinCEN’s) requests within the designated time frame.
* Requesting the required information from foreign banks.
* Complying with recordkeeping requirements.
 |  |
| 1. If the bank has received a written request from FinCEN on a specific foreign bank:
* Verify that the response was provided to FinCEN within the designated time frame.
* If the bank uses the [model CISADA certification form](https://www.fincen.gov/sites/default/files/federal_register_notice/CISADA_Certification.pdf), verify the form is complete and certified by the foreign bank.
* If the bank does not use the model CISADA certification form, determine whether the bank’s reporting format captures the required information and certification.
* Verify that the bank maintains for a period of five years a copy of any report filed and the original or any business record equivalent of any supporting documentation for a report, including a foreign bank certification or other responses to an inquiry under this section.
 |  |
| 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 Bank Secrecy Act (BSA) regulatory requirements associated with reporting obligations on foreign bank relationships with Iranian-linked financial institutions.
 |  |