Reports of Foreign Financial Accounts Examination and Testing Procedures

Objective: *Assess the bank’s compliance with the BSA regulatory requirements for the reporting of foreign financial accounts.*

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| **Procedure** | **Comments** |
| 1. Determine whether the bank has a financial interest in, or signature or other authority over, bank, securities, or other financial accounts in a foreign country. Additionally, determine whether the bank is required to file a Report of Foreign Bank and Financial Accounts (FBAR) for customer accounts, including trust accounts, in which the bank has a financial interest or over which it has signature or other authority. |  |
| 1. Review the bank’s policies, procedures, and processes for filing annual FBARs to determine whether they meet the BSA regulatory requirements for FBAR reporting. |  |
| 1. Determine whether the bank’s internal controls are designed to assure ongoing compliance with FBAR filing requirements and are commensurate with the bank’s risk profile. |  |
| 1. Select a sample of accounts subject to FBAR filing requirements to determine whether:  * FBARs are filed in accordance with FinCEN form instructions. * FBARs filed contain accurate and complete information. * Any discrepancies exist between the bank’s records of FBARs and the FBARs reflected in the BSA reporting database. * The bank has taken corrective action where errors are identified. * The bank retains copies (electronic format or paper copies) of FBARs for five years from the date of the report. |  |
| 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 FBARs. |  |