

How to Use This Manual

The Bank Secrecy Act (BSA) has never been a bigger concern to regulators and remains a minefield for financial institutions. Regulators continue to place increased emphasis on ensuring that financial institutions are in compliance with the Bank Secrecy Act and related anti-money laundering (AML) laws and regulations. Because of this intense scrutiny by your examiners, you need to have confidence that your institution's BSA/AML program is effectively implemented.

One of the fundamental requirements of the Bank Secrecy Act is the designation of a BSA officer. As BSA officer, you are responsible for administering your institution's anti-money laundering program and ensuring that staff in each functional area of the institution know what their responsibilities are in this regard. You are responsible for making sure your institution is in compliance.

Every area of your financial institution is responsible for complying with the Bank Secrecy Act, the USA PATRIOT Act, and anti-money laundering requirements. From the teller to the directors of your institution, each member of your staff will be called upon in some way to protect the institution from criminal activities that would benefit terrorist organizations, and to avoid allowing any funds to be laundered.

The *BSA Officer Certification Program* provides the training necessary to make sure that you are effective in implementing your institution's BSA/AML compliance program. This course covers all aspects of BSA/AML compliance:

- Money laundering techniques
- Currency transaction reporting
- Suspicious activity reporting
- Establishing a compliance program
- Recordkeeping requirements
- Money service businesses
- Risk assessment
- Information sharing
- OFAC compliance
- Training of appropriate personnel
- Penalties for noncompliance

Anti-money laundering laws and regulations apply to all financial institutions. Although this program uses a bank as a model, the information contained in each section is also applicable to thrifts, savings banks, credit unions, and other organizations considered to be financial institutions under the Bank Secrecy Act.

Successful completion of this program, together with meeting the requirements below, will earn you the designation of Certified Sheshunoff Bank Secrecy Act Officer (CSBSAO), a certification that will let your institution, your regulators, and the world know that you have met the standards of education, experience, and skill required for this prestigious recognition by the industry leader in bank compliance.

The certification program consists of a BSA course and a USA PATRIOT Act course. A forms section in the manual contains the forms you will use for BSA/AML reporting. A resources section contains other material such as regulatory guidance, regulators' answers to frequently asked questions, red flags that could indicate money laundering and terrorist financing, a risk assessment matrix, a sample customer identification program (CIP) policy and procedures, and an overview of the BSA/AML regulatory examination manual.

The contents of both courses in Microsoft Word format can be downloaded from the CD that comes with this manual. The accompanying forms and resources are available on the CD in Word or Adobe Acrobat format. The complete *FFIEC BSA/AML Examination Manual* can be downloaded from the CD; the table of contents and introduction are printed in the Resource section. Please refer to your User Guide on the CD for directions on how to get the most from your CD.

CODE OF ETHICS

As a Certified Sheshunoff Bank Secrecy Act Officer:

- I will keep myself informed of the requirements of the Bank Secrecy Act and related laws and regulations enacted and promulgated to fight drug trafficking, money laundering, and other crimes.
- I will, to the best of my ability, apply these laws to protect this financial institution from being used as an intermediary for, or to hide the transfer or deposit of money derived from, criminal activity or the financing of terrorist activity.
- I will act in conformity with applicable law and regulations and cooperate in every appropriate way with all governmental bodies in the interest of establishing and maintaining an efficient and fair framework for combating money laundering and the financing of terrorist activity.
- I will exercise honesty, objectivity, and diligence in the performance of my duties and responsibilities.
- I will safeguard all confidential information and exercise due care to prevent its improper disclosure.
- I will take responsibility for managing all aspects of my institution's Bank Secrecy Act compliance program.

- I will ensure adequate training of all personnel whose duties require knowledge of the Bank Secrecy Act and related laws and regulations.
- I will continually strive for improvement in the proficiency and effectiveness of my service.
- I will adhere to all appropriate standards of professional conduct.

CERTIFICATION PROGRAM REQUIREMENTS

General Information

With the purchase of this book, one individual is eligible for certification. Others within the same physical location of an institution may apply for certification at a discounted rate. Contact Customer Service at 1-800-456-2340 for more information on registering in the program.

You should read each course one lesson at a time. At the end of each lesson, there is a lesson review. Questions in the lesson review should be answered before proceeding to the next lesson. At the end of each course, there is a course assessment. You should complete these assessments and compare your answers with those that are provided. Once you have completed both course assessments in this manual, you can request the final examination by calling Customer Service at 1-800-456-2340 or e-mailing certification@sheshunoff.com.

After requesting the exam, if applicable, an invoice will be sent for the test processing fee. After payment is received, the exam will be e-mailed to the senior officer who will act as proctor.

You must provide a letter of recommendation from bank management endorsing your candidacy for certification. You must also sign the CSBSAO Code of Ethics, which will be sent via e-mail. You must print out these two documents, sign them, and mail them back to Sheshunoff Information Services, Certification Department, 807 Las Cimas Parkway, Suite 300, Austin, Texas 78746.

The exam is self-administered in your institution. Instructions will be sent to your proctor along with an electronic copy of the exam.

You must score 80 percent or higher on the final examination. After successfully completing the final exam, students receive a certificate. Certification is valid for two years from the date of certification. After your initial certification expires, you must receive recertification. Sheshunoff provides course materials for the recertification examination as part of the main subscriber's annual fee.

In order to maintain CSBSAO certification, you must complete five hours of continuing education credit each year. Acceptable hours include audio conferences, online courses, and self-paced study courses from Sheshunoff Information Services, A.S. Pratt and Sons, and AlexInformation, and other SIS-approved continuing education courses.

Sheshunoff reserves the right to modify the program's exam requirements and related fees at any time.

To Request a Module Exam

Call Sheshunoff Customer Service at 1-800-456-2340. Request the exam directly from Customer Service, or ask to speak with a representative for the BSA Officer Certification Program.

If you prefer, you may send an e-mail request to certification@sheshunoff.com. Be sure to put “BSA Officer Certification Examination” in the subject line. Please include the following information in your e-mail request:

- Main subscriber/student’s full name
- Name and e-mail address of senior officer who will act as your proctor
- Contact information for your institution (name, mailing address, telephone number)
- Sheshunoff account number

INSTRUCTIONS FOR EXAM

Exam Rules

The final exam is governed by the rules below. Failure to adhere to the rules will result in your disqualification from the certification program.

- The exam is the property of Sheshunoff Information Services, Inc. It may only be stored, and retransmitted, in whole or in part, by the proctor.
- You must certify that you took the test in accordance with the exam instructions. A senior officer in your institution must proctor your exam and certify your compliance with the exam requirements.
- You must print, sign, and mail the CSBSAO Code of Ethics and your recommendation letter to Sheshunoff Information Services, Certification Department, 807 Las Cimas Parkway, Suite 300, Austin, Texas 78746. These documents must be received no later than one month after the test is submitted electronically.
- Only the registered student may take the test. Another person may not take the test for the registered student.
- You may not reproduce the test and related materials.
- After you receive the exam from your proctor, you have 75 minutes to return the completed exam to him or her.
- After you send your completed exam, your proctor will forward your exam to certification@sheshunoff.com. To receive certification, you must score 80 percent or higher on the exam.

- Note that a student has two opportunities to pass the exam. After the second, unsuccessful attempt, the student must wait one year from the date of the second failed test before retesting.
- If the test taker is not a subscriber to this program, there will be a registration fee for each additional student, *if and only if* the primary subscription is current and the test taker is at the same physical location as the primary subscriber. If the institution has students at more than one location, there must be a primary subscriber at each location.

Taking the Test

- Answer each question by clicking on the box next to your answer choice. A checkmark should appear in the box of your answer choice. If you do not answer a question, we will count it as incorrect. For questions with more than one correct answer, click on each correct answer. The maximum test score you may receive is 100 percent. All questions are worth an equal number of points.
- This is a closed-book test. You may not refer to other individuals or outside reference materials for answers or information while taking the test.
- No later than 75 minutes after the test is received, the test taker must e-mail the exam back to the proctor. The proctor then sends the Word document to certification@sheshunoff.com for grading.

