

Summary of Services

An independent review of the automated software will be conducted, to include the following, as applicable:

- Evaluation of policies, procedures, and processes to determine they adequately address oversight of the system and system controls.
- Review of the bank's BSA/AML risk assessment to determine it appropriately integrates use of the software.
- Review of the bank's prior independent software validation report and any related regulatory examination reports to evaluate actions to correct prior violations or deficiencies identified related to the system.
- Assess operational reporting to determine whether the appropriate parties are advised of the effectiveness and functionality of the system.
- Determine if the system settings are appropriate and effective based on the size of the institution, geographies, products and services, and nature of customer relationships.
- Review threshold settings established for the system and evaluate the reasonableness of any subsequent adjustments made to customize the system, since the previous validation performed on the software.
- Evaluate system access controls to determine that dual control procedures and an appropriate change management process is in place.
- Assess the bank's procedures to identify and resolve data import errors.
- Evaluate the process for adding new products and services.
- Determine adequate resources have been allocated to appropriately manage the software, including appropriate training.
- Evaluate the process for monitoring and modification of the risk rating model.
- A review of the software data accuracy to ensure effective monitoring for suspicious activity.
- Transactional testing includes, as applicable:
 - Transaction code mapping from core system to monitoring software.
 - Transaction testing of various products, services, and delivery systems.
 - Transactions below the reporting threshold.
 - New customer identification, customer due diligence information, and customer risk ratings.
 - Relationships identified as high risk.
 - BSA related alerts.
 - SAR investigation cases.
- Determine timeliness and appropriateness of alert resolution.
- Identify opportunities to modify alert threshold settings that would decrease generation of false positive alerts.