

TRAINER'S GUIDE



CIP (Customer Identification Program) COMPLIANCE TRAINING

August 2003

Session Checklist:

Before the Training...

- Read the “Trainer’s Guide” and attend the “Train The Trainer” class.
- Be sure to get a copy of the “CIP Policy and Procedures”, and skim it for topics that may interest you and those you have to train. (You may want to have a copy on hand during training. You may want to give each office a copy; however it will be on the Intranet for their reference.)
- Prepare any additional training aids you feel would be helpful. Determine if you will do a game at the end of class. (optional)
- Schedule training sessions with all community offices, lending offices, or affiliate customer contact staff you are responsible for training – each session should take approximately 1 hour, or less. Please schedule sessions so that all offices have been trained by **September 17, 2003.**
- A few days prior to each session contact the office staff to remind them of the session date and time.
- Make copies of the following:
 - ⇒ CIP Compliance Training packet – one copy for each individual attending the training.
 - ⇒ Participation sheet – one copy for each office you are training.
 - ⇒ The “CIP Policy and Procedures” (one per office – it is also available on the Intranet)

During the Training...

- Distribute the participation sheet and ask all attendees to sign. Maintain until all sessions have been completed, and all employees have been trained.
- Immediately after the session, ask each attendee to complete the training evaluation form at the end of their packet and interoffice mail them directly to the Compliance Department. They do not have to note their names on the forms.

After All Sessions Have Been Completed...

- Complete the training completion form included in this packet
- Forward the following to the Compliance Department:
 - Training completion form
 - Participation sheets from each session
 - Question Log summarizing all unanswered questions

TRAINING PARTICIPATION SHEET

CIP and Compliance Refresher Training

SUBJECT: CIP and Compliance Refresher Training

DATE OF TRAINING: _____

AREA/COMMUNITY OFFICE(S) TRAINED: _____

NAME (PRINT)	SIGNATURE
1.	
2.	
3.	
4.	
5.	
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10.	
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16.	
17.	
18.	
19.	
20.	



ANSWERS TO GROUP EXERCISES – Regulation CC

1. Day of Deposit = Monday

Tuesday = \$200 on us check

Wednesday = \$250 Local check

Note: Refer to Page 20 of Personal Deposit Disclosure Booklet, paragraph that reads:
“If you deposit both categories of checks, \$100 from the checks will be available on the first Business Day after the day of your deposit, not \$100 from each category of checks.”

2. Day of Deposit = Monday

Tuesday = \$500 Available

3. Day of Deposit = Thursday

Friday = \$100 Available

Monday = \$100 Available

Tuesday = \$300 Available

4. Day of Deposit = Tuesday

Wednesday = \$100 Available

Thursday = \$300 Available

5. Day of Deposit = Monday

Monday = \$60 Available immediately

Tuesday = \$200 Available

Following Monday = \$40 Available

Note: Refer to page 21 of Personal Deposit Disclosure Booklet for rules on ATM availability.

6. Refer to Page 17 of the Personal Deposit Disclosure Booklet for last sentence – 1st paragraph on Regulation CC, which states, “Even after we have made funds available to you and you have withdrawn funds, you are still responsible for checks you deposit or checks you cash that are returned to us unpaid and for any other problems involving your deposit.”

Explain the difference between availability and the actual clearing of a check.

Exceptions can be made to funds availability, however Branch Administration cautions that:

- ⇒ Exceptions are on a case by case basis and may not guarantee that every transaction for that customer will be treated identically.
- ⇒ Branches that make exceptions need to do so based on the account history including overdrafts, uncollected amounts, and the like.
- ⇒ Proceed with caution.

INSTRUCTIONS FOR TIC TAC CIP GAME



Instructors:

- ✓ Required Materials – set of questions and answers (provided)
- ✓ Optional Materials – Flip Chart, Colored Markers, Coin or Dice

1. **Game is optional** – but is a good way to check the learning and understanding of some of the basic and more difficult parts of the subject material, and also to lighten the learning of Compliance material.
2. Divide trainees into two groups: X's and O's. (Instructor may want to use a flip chart or blackboard with the game board in a larger version similar to the format below to make answering the questions easier. Different colored markers may be used for each team. Alternatively, instructors may give each trainee a copy of this page and play the game at a table setting using pen and paper.)
3. Flip a coin or dice to see which group will go first.
4. The first team will pick a question by number. The instructor will read the question from the training packet. (Note: team members should not have the questions in advance).
5. If answered correctly – that team gets an X or O in that box for their team. If not answered correctly, the opposing team will get one chance to try to answer the question correctly. The mark of the team with the correct answer will appear on the Game Board. (Instructors can use alternate questions, if no one can answer the question asked.....be sure to cover the issues raised in the questions that could not be answered, however.)
6. The game continues until someone gets Tic-Tac-CIP – i.e. diagonally, horizontally, or vertically. In the case of a tie, the instructor can use any of the alternate questions to break the tie.
7. Small prizes for the winners such as candy bars, pencils, tablets, etc. are optional.

TIC-TAC-CIP GAME BOARD

①	②	③
④	⑤	⑥
⑦	⑧	⑨

TIC TAC CIP

(Instructor Questions)

<p>①</p> <p>Q: Person who is BSA Officer for our company.</p>	<p>②</p> <p>Q: AML is another name for this.</p>	<p>③</p> <p>Q: Name the last step in the process of Money Laundering.</p>
<p>④</p> <p>Q: Name the 4 minimum pieces of information required from all customers.</p>	<p>⑤</p> <p>Q: What is a Casa De Cambia?</p>	<p>⑥</p> <p>Q: Name an insurance product that could most likely be used for money laundering.</p>
<p>⑦</p> <p>Q: CIP retention is X years after an account is closed.</p>	<p>⑧</p> <p>Q: When you know a customer's normal activity and deposit patterns and you fail to notice unusual changes in those patterns.</p>	<p>⑨</p> <p>Q: The doctrine of "Reasonable Belief" states that you know xxx.</p>

Extra Questions (If needed)

10. BSA stands for _____.
11. When a customer does not want their information shared with an affiliate, this is called _____.
12. The initials OFAC stand for _____.
13. The term SAR stands for _____.
14. If you report a suspicious activity, and it is later found to be normal or acceptable, you are still protected under the _____.
15. The name of the rule that covers CIP.

TIC TAC CIP

(Instructor Answers)

① A: Lee Roberts	② A: Anti-Money Laundering	③ A: Integration
④ A: Name, Birth Date, Address, SS# or EIN	⑤ A: Money Exchange House	⑥ A: Single Premium Life Insurance
⑦ A: 5 Years after date account closed	⑧ A: Willful Blindness	⑨ A: The true identity of the customer.

Answers to Extra Questions

10. Bank Secrecy Act
11. Opt-out
12. Office of Foreign Assets Control
13. Suspicious Activity Report
14. Safe Harbor Rule
15. USA Patriot Act, Section 326.

AT COMPLETION OF EACH SESSION



INSTRUCTOR:

- Ask if there are any questions. Record any questions that you do not feel comfortable answering on the Question Log Sheet and forward to the Compliance Department. All logged questions will be addressed.

- Instruct participants to complete the Training Evaluation Form at the end of their training packet. These are to be completed and returned directly to the Compliance Department.

- Thank everyone for their time and attention.

