

Sample Checklist

Customer Due Diligence and Beneficial Ownership

(This is only a sample. Actual tasks at your institution may differ.)

Category	Tasks	Details/Comments	Due Date	Completed Date	Responsible Party
Policies	BSA Policy				
	OFAC Policy				
	CIP/New Acct Opening Policies				
	Other				
Procedures	New Acct Opening Procedures				
	Update CTR aggregation procedures				
	Update OFAC scanning procedures				
	Update suspicious activity monitoring procedures				
	Other				
Forms	Signature Card				
	Certification Form				
	New Account Worksheets				
	Other				
Onboarding Processes	What will you collect				
	What will be entered at onboarding				
	OFAC scanning				
	Are sufficient name lines available to enter beneficial ownership info?				
	Other				
System Changes	Beneficial Ownership Information and CIP				
	Relationship Code Updates				
	Data feed changes for data from Host to AML systems				
	Changes to CTR aggregations systems				
	Changes to structuring aggregation				
	Ability to collect additional CDD information				
	Ability to collect expected activity				
	Create reports of accts whose activity differs from expected				
Training	Train branch personnel				
	Train central operations				
	Train BSA dept.				
	Train any other depts. as necessary				
	Other				