RESCINDED

**OCC BULLETIN 2010-21**

**Subject: Bank Secrecy Act/Anti-Money Laundering**
**Date: June 15, 2010**

**To: Chief Executive Officers, BSA Officers, and Compliance Officers of All National Banks, Federal Branches and Agencies, Technology Service Providers, Department and Division Heads, and All Examining Personnel**

OCC 2010-21 was replaced by OCC 2014-60

**Description: Notification on the Release of the Revised BSA/AML Examination Manual**

**The guidance attached to this bulletin continues to apply to federal savings associations.**

On April 29, 2010, the Federal Financial Institutions Examination Council (FFIEC) released the revised *Bank Secrecy Act/Anti-Money Laundering (BSA/AML) Examination Manual.* The revised manual reflects the ongoing commitment of the federal and state banking agencies to provide current and consistent guidance on risk-based policies, procedures, and processes for banking organizations to comply with the BSA and safeguard operations from money laundering and terrorist financing. The 2010 version further clarifies supervisory expectations since the August 24, 2007, update.

Attached is an interagency notification about the release of the manual. This notification includes information about the significant revisions to the manual. The manual's table of contents indicates which sections have been revised.

The 2010 version of the manual is located on the FFIEC BSA/AML InfoBase [http://www.ffiec.gov/bsa_aml_infobase/default.htm].

/signed/

Ann F. Jaedicke
Deputy Comptroller for Compliance Policy

**Related Link**

- Interagency Statement

**Board of Governors of the Federal Reserve System**
**Federal Deposit Insurance Corporation**
**National Credit Union Administration**
**Office of the Comptroller of the Currency**
**Office of Thrift Supervision**
**State Liaison Committee**

## The 2010 Version of the Bank Secrecy Act/Anti-Money Laundering Examination Manual

April 29, 2010

The Federal Financial Institutions Examination Council (FFIEC) today released the revised *Bank Secrecy Act/Anti-Money Laundering (BSA/AML) Examination Manual.* The revised manual reflects the ongoing commitment of the federal and state banking agencies to provide current and consistent guidance on risk-based policies, procedures, and processes for banking organizations to comply with the BSA and safeguard operations from money laundering and terrorist financing. The 2010 version further clarifies supervisory expectations since the August 24, 2007, update. The revisions again draw upon feedback from the banking industry and examination staff.

The Board of Governors of the Federal Reserve System, Federal Deposit Insurance Corporation, National Credit Union Administration, Office of the Comptroller of the Currency, Office of Thrift Supervision, and State Liaison Committee (Agencies) revised the manual in collaboration with the Financial Crimes Enforcement Network (FinCEN), the administrator of the BSA, and the Office of Foreign Assets Control (OFAC). FinCEN and OFAC collaborated on the revisions made to the sections that address compliance with the regulations and sanctions programs that FinCEN and OFAC administer and enforce.

Revisions were made throughout the manual. The sections with more significant updates are again noted in the table of contents with "2010." Significant updates include:

**Bulk Currency Shipments —** Added one new section, on bulk currency shipments.

**BSA/AML Compliance Program Structures —** Substantially reworked the section on Enterprise-Wide BSA/AML Compliance programs to discuss the variety of BSA/AML compliance programs that exist, reflect current supervisory expectations, and enhance the specific discussion of consolidated compliance programs. The section is now titled "BSA/AML Compliance Program Structures."

**Core Examination Procedures for Assessing the BSA/AML Compliance Program —** Streamlined and reorganized the core examination procedures for assessing the BSA/AML compliance program to make them more logical.

**Developing Conclusions and Finalizing the Examination —** Revised the section to include guidance to examiners on how to determine whether a violation is systemic or recurring, as opposed to a technical or isolated violation.

**Currency Transaction Reporting Exemptions —** Updated the section to reflect the changes in the regulation and FinCEN guidance in this area.

**Funds Transfers —** Updated the section to reflect introduction of the SWIFT MT 202 COV message format.

**Suspicious Activity Reporting —** Enhanced the discussion of methods to identify, research, and report suspicious activity. Reorganized the section to reflect current supervisory expectations and made the discussion easier to follow and more user-friendly. Added a new Appendix S to illustrate the interaction between the different components of a suspicious activity monitoring program.

**Automated Clearing House Transactions —** Updated the section to reflect the recent changes to international Automated Clearing House transactions. Made corresponding changes to the OFAC section.

**Electronic Cash —** Revised the section to include a more in-depth discussion of Prepaid Cards.

**Trade Finance Activities —** Updated the definitions in the section to more closely reflect actual usage in the industry and added a reference to recent Wolfsberg Group guidance.

**Electronic Banking —** Updated the section (specifically, the Remote Deposit Capture discussion) to reflect the FFIEC guidance, *Risk Management of Remote Deposit Capture* (January 14, 2009).

**Third-Party Payment Processors —** Updated the section to reflect recent agency guidance, *Guidance on Payment Processor Relationships*, FDIC FIL-127-2008 (November 7, 2008), and *Risk Management Guidance: Payment Processors*, OCC Bulletin 2008-12 (April 24, 2008).

The 2010 version of the manual is located on the FFIEC BSA/AML InfoBase at: http://www.ffiec.gov/bsa_aml_infobase/default.htm.