

## **BSA (Bank Secrecy Act) Investigator Course Syllabus**

### **Directions for Each Participant in the BSA Investigator Course**

- **Requirements**
  - Estimated presentation time: 9 hours
  - Quiz after each module
  - Final Exam with a passing score of at least 80% (with 2 attempts allowed before the entire course must be redone)
  - The time limit for the Final Exam is 2 hours.
- **Credits Given**
- **Other Directions**

This course will provide attendees with a solid foundation to launch a career in the Bank Secrecy Act (AKA BSA) which encompasses anti-money laundering (AML) and the counter financing of terrorism (CFT). This program is comprised of 11 modules with each covering a specific area that pertains to a foundational understanding of BSA. Within these modules, our Director of Training will provide an introduction to financial services, an introduction to BSA, as well as Currency Transaction Reports (CTRs)/Monetary Instruments (MIs)/Funds Transfers, an overview of risk assessments, with some specific risks to consider, Customer Identification Program (CIP)/Customer Onboarding, monitoring basics, Customer Due Diligence (CDD)/Enhanced Due Diligence (EDD)/Beneficial Ownership, Office of Foreign Assets Control (OFAC), Suspicious Activity Reports (SARs), and actual Case Studies. After completing each module there will be a quiz, and a final exam will be given with after all modules have been completed.

The objectives of this course are:

1. To get a better understanding of financial services.
2. To get a better understanding of the Bank Secrecy Act (BSA).
3. To understand what CIP/CDD/EDD/Beneficial Ownership are and their importance in a BSA investigation.
4. To recognize risk and higher risk considerations when conducting investigations.
5. To recognize what elements an investigator needs to gather, how to analyze the risks presented, and how to document the findings, in order to conduct an in-depth BSA investigation.

### **Modules**

1. Introduction Module with directions for the attendee – 11 Slides - Estimated Time of Recording: 8 minutes

**2. Introduction to Financial Services – 23 Slides – Estimated Time of Recording: 38 minutes**

- What is a Financial Institution? – 5 Slides
- What Does a Financial Institution Do? – 18 Slides
  - Consumer Products and Services
  - Business Products and Services
  - Lending Products and Services

**3. Introduction to the Bank Secrecy Act (aka BSA) – 55 Slides – Estimated Time of Recording: 62 minutes**

- What is the Bank Secrecy Act? – 30 Slides
  - Introduction
  - Examiner Expectations
  - Financial Fraud
  - Other Key Terms
  - Money Laundering vs. Terrorist Financing
  - Five Pillars
  - Risk
- How Do FIs (Financial Institutions) Work with the Government – 9 Slides
  - FinCEN (Financial Crimes Enforcement Network)
  - CTRs overview
  - SARs overview
  - Source of Funds
  - FinCEN Priorities
- Section 314(a) – 7 Slides
- Section 314(b) – 9 Slides

**4. CTRs-MI-Funds Transfers – 27 Slides – Estimated Time of Recording: 23 minutes**

- Currency Transaction Reports – 15 Slides
  - Overview of Requirements – 7 Slides
  - CTR Exemptions – 8 Slides
- Monetary Instruments – 5 Slides
- Funds Transfers – 7 Slides

**5. Risk Assessments – 39 Slides – Estimated Time of Recording: 33 minutes**

- Understanding Risk Assessments – 15 Slides
- Accurately Measuring Risk – 9 Slides
- Important Groups to Know – 15 Slides
  - Egmont
  - Financial Action Task Force (FATF)
  - Basel AML Index
  - The Wolfsberg Group

**6. Other Risks to Consider – 71 Slides – Estimated Time of Recording: 75 minutes**

- Higher-Risk Customers and Products – 21 Slides
  - Politically Exposed Persons (PEPs)
  - Independent ATM (Automated Teller Machine) Owners & Operators
  - Charities & Non-Profits
  - Money Services Businesses (MSBs)
  - PPP/Other Types of Loan Fraud Monitoring
- Key Areas to Consider – 50
  - Money Laundering (ML) – 13 Slides
  - Terrorist Financing (TF) – 7 Slides
  - Proliferation Financing (PF) – 11 Slides
  - Human Trafficking – 5 Slides
  - Virtual Currency – 5 Slides
  - High Risk Geographies – 3 Slides
  - OFAC Risk – 6 Slides

**7. CIP-Customer Onboarding – 74 Slides – Estimated Time of Recording: 77 minutes**

- Key Terms & Documentation – 21 Slides
- Synthetic ID Theft – 19 Slides
  - Definitions
  - Red Flags
  - Fraud Concerns and Mitigation
  - E-KYC
  - Guidance from FinCEN
- Customer Risk: Individual – 4 Slides
- Customer Risk – Entities – 30 Slides
  - Types of Entities – 12 Slides
  - Types of Risk for Entities – 5 Slides
  - Shell/Shelf Companies – 4 Slides
  - Beneficial Ownership – 3 Slides
  - Geographic Risk – 6 Slides

**8. Monitoring Basics – Conducting Customer Reviews – 68 Slides – Estimated Time of Recording: 77 minutes**

- Key Terms – 2 Slides
- Introduction – 5 Slides
- Monitoring Individuals and Businesses – 25 Slides
  - Sources of Suspicious Activity
  - All Types of Accounts & How to Monitor Them
  - Financial flows
- Understanding Software – 16 Slides
- Conducting Customer Reviews – 20 Slides

**9. CDD/EDD and Beneficial Ownership – 32 Slides – Estimated Time of Recording: 38 minutes**

- Customer Due Diligence (CDD) & Enhanced Due Diligence (EDD) – 20 Slides
- Beneficial Ownership – 12 Slides

**10. OFAC – 30 Slides - Estimated Time of Recording: 24 minutes**

- Overview of OFAC – 24 Slides
- Example of OFAC Sanctions (Russian Invasion of Ukraine) – 6 Slides

**11. SARs – 37 Slides – Estimated Time of Recording: 46 minutes**

- Introduction/Overview – 8 Slides
- Emphasis on the Narrative – 11 Slides
- Key Words – 1 Slide
- Law Enforcement Partners – 2 Slides
- Sample SAR Narratives – 3 Slides
- 314(b) Reminder – 1 Slide
- SAR FAQs (Frequently Asked Questions) – 8 Slides
- SARs Not Filed (Negative SARs) – 3 Slides

**12. Case Studies – 18 Slides – Estimated Time of Recording: 30 minutes**