BSA Risk Assessment

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| **Risk Factor** | **Risk Level** | **Areas of Concern** | **Current Controls** | **Needed Controls** |
| Member Base | Moderate | Member base increasing due to opening of a new branch. Expect new business members at this location. | * Strong MIP
* Automated system for aggregating cash transactions over time
* Other automated fraud reports
* Reports monitored daily
* Ongoing training of staff and board
 | * Account Opening Due Diligence procedures need to be strengthened.
* Need to develop an account opening due diligence form for business members to complete at account opening
* Need a way to track accounts for non-resident aliens since the new area has a high population of non-resident aliens
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| E-Banking |  |  |  |  |
| BSA Reporting |  |  |  |  |
| High Risk Members and Businesses |  |  |  |  |
| Foreign Correspondent Financial Institution Accounts |  |  |  |  |
| Private Banking, Trust and Asset Management Services |  |  |  |  |
| International Accounts |  |  |  |  |
| Wire Transfers |  |  |  |  |
| HIDTA and HIFCA |  |  |  |  |
| Geographic Location |  |  |  |  |
| Staff Turnover |  |  |  |  |