# Overall OFAC Risk Assessment

|  |  |  |  |
| --- | --- | --- | --- |
| **Risk Area** | **Degree of Risk** | **Areas of Concern** | **Risk Controls** |
| Membership Base | Low- Credit union has a stable, well-known membership base in a localized environment. | Credit Union does permit non-resident aliens to be members | * OFAC screening upon membership opening and when the SDN list is updated.
* Thorough identification through CIP procedures
 |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |

# Product Risk Assessment

|  |  |  |  |
| --- | --- | --- | --- |
| **Product** | **Degree of Risk** | **Areas of Concern** | **Risk Controls** |
| Share Drafts | Low- Membership is primarily known consumers. | Scanning the payees of all on-us checks is cost prohibitive. | * Training: All employees receive OFAC training and are taught to spot suspicious transactions and trends
* Employees will scan draft payees against OFAC if they have any concerns the payee is on the SDN list.
 |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |