

SAMPLE BANK
USA PATRIOT ACT DEPARTMENT QUESTIONNAIRE

This document is intended to be used by you in polling each of your departments with account opening or the establishment of customer relationships regarding current identification practices and procedures, including but not limited to:

- Deposits
- Consumer Loans
- Commercial Loans
- Mortgage Loans
- Leasing
- Trust Department
- Insurance Agency
- Investments
- Third Party Sources for Loans or Other Accounts (car dealers, brokers, etc.)

I recommend that you hold a short meeting to review the CIP handouts we have provided that outline the basic requirements regarding new identification information as of October 1, 2003. I suggest you distribute this to each of your department managers of appropriate departments and request it to be completed and returned to you within 2 weeks at the most. Go over the questionnaire in the meeting (or in a cover memo if not an in-person meeting) to minimize questions and clarification later.

These questionnaires will be extremely important in documenting why we believe that we can exempt current customers from the additional requirements post-October 1, 2003. By reviewing this completed questionnaire, you can also develop a good idea of what forms, procedures, policies, and training needs to be updated. Remember that the most critical question to ask before you begin finalizing procedures is, "Will we maintain identification information at the account level or at the Customer Information File level?" I recommend that you utilize the CIF level to eliminate having to obtain information again when current customers open additional new accounts at a later date.

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DEPARTMENT: _____

1. Who are your clients? (Primarily Commercial? Consumer? Both?)

2. What identifying information do you currently request (If a written list is used, please refer to it in your answer and attach a copy to this questionnaire.):
 - a. When opening an account for a US consumer?

 - b. When opening an account for a Non-US consumer?

 - c. When opening an account for a US commercial entity?

 - d. When opening an account for a Non-US commercial entity?

 - e. When adding a signer to an existing account?

3. If the documents listed in question #2 are not available, what alternative documentation is acceptable?

4. How do you (or do you) currently verify the information given to you by:
 - a. A commercial entity? (i.e., articles of Incorporation, Business License, Partnership Agreement?)

 - b. A consumer (including signers on commercial accounts) who is a US Person?

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- c. A consumer (including signers on commercial accounts) who is not a US Person?

 - d. A consumer who is not present during the account opening process? (Example, a man opens a joint checking account and his spouse is not present)
5. If dealing with a loan client, do you currently check the OFAC list prior to disbursing the loan?
- a. If so, how do you do that?
6. If a client has more than one address (i.e., a mailing address and the principal place of business or residential address) do you obtain both?
- a. If yes, where is this information recorded?

 - b. What questions do you ask to obtain this information?

 - c. Is there a form that currently you use to document this information obtained? If so, please attach a copy to this questionnaire.
7. Do you obtain a TIN/EIN on all individuals and entities?
- a. Describe a situation, if any, when you may not do this.

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- b. If a business has applied for an EIN but does not yet have one, what follow up procedures do you use to ensure that we obtain that information?
 - i. *(Note: Are you aware there are now procedures via telephone and Internet that you can utilize to assist the new business in obtaining an EIN over the telephone? If not, contact your BSA Officer for details immediately!)*

- 8. Do you allow a client to use an account, even if all information has not been obtained (i.e. do you order checks and check cards even though you have not obtained information on a joint signer not present at account opening or did not have information on hand, etc.)?
 - a. Do you use any account restrictions in the interim (deposit holds, limited check card use, etc.)? If so, describe.

- 9. How do you verify the legitimacy of out-of state identification documents?
 - a. Do you retain copies of these documents?

- 10. How do you verify the legitimacy of Non-US Person documents (Passport, Green Card, Visas, etc.)?
 - a. Do you retain copies of these documents?

- 11. How do you verify the legitimacy of business documents?
 - a. Do you retain copies of these documents?

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12. What are your current procedures if the documentation given to you to open an account is unfamiliar to you?
 - a. Do you retain copies of these documents?

13. What are your current procedures if the documentation given to you cannot be verified?

14. For accounts opened other than face-to-face, how do you obtain and verify the documentation you need to open the account?

15. How do you identify elderly or disabled clients who do not have driver's licenses or State ID cards?

16. What follow up procedures are you currently using to ensure legitimacy of an account (letters, phone calls, site visits, etc.)?

17. If you deal in brokered loans or dealer car loans, how do you identify clients referred to your department by a broker or dealer?

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- a. What challenges will the new CIP identification requirements present for your area?

18. New procedures will require that the bank record client identification information and retain this information for 5 years after the customer identification record is created. What difficulties do you anticipate for your department in complying with this procedure?

- a. Where would this documentation be housed in your current environment?
- b. Where do you think it should be housed, if not at the current location?

19. The new regulations require that we give clients notice that we are requesting certain identification information. How do you think this should be given? Choose at least one and tell us why you think that would be an effective method. *(Don't forget to consider third parties involved in account opening – brokers, car dealers, etc.!)*

- a. Lobby sign
- b. Written notice
- c. Oral notice
- d. Via the Internet

Completed by: _____ Date: _____

Reviewed by: _____ Date: _____

July 2003