

SAMPLE BANK BSA/AML RESPONSIBILITY MATRIX

	BSA Task	Preparer	Reviewer	Trainer	Comments
1	Monetary Instrument Logs	Teller Personnel	Head Teller reviews daily then monthly send log to Deposit Ops for review and central retention	Online Training and one-on-one sessions as needed	
2	Currency Transaction Reports (CTR)	*Tellers for known reportable transactions *Deposit Operations for aggregated transactions (i.e. multiple branches, related account owners, etc.)	*Deposit Ops for CTRs prepared by tellers *BSA Administrator for CTRs prepared by Deposit Operations	Online Training and one-on-one sessions as needed in addition to regular teller meetings	
3	CTR Exemptions	Deposit Operations	BSA Administrator	Online Training	
4	Customer Identification Program	Account officers – loan , trust, investment, insurance or deposit officers that are the first point of contact with customers	Deposit Operations	Online Training and one-on-one sessions as needed. Subsidiaries have custom training.	
5	High Risk Customer Identification	Deposit Operations	BSA Coordinator and BSA Officer	Online Training and in-bank sessions	
6	High Risk Customer Monitoring	Deposit Operations with AML Software and other bank records	BSA Coordinator and BSA Officer	Online Training and in-bank sessions	
7	Money Service Businesses	Deposit Operations with assistance of branch personnel	BSA Coordinator and BSA Officer	Online Training and industry sessions	
8	OFAC – Initial Contact	Account officers – loan officer (credit reports) or deposit officers (ChexSystems report) that are the first point of contact with customers	BSA Coordinator with BSA Officer as final sign-off of high probability, close potential matches	Online Training	
9	OFAC – Regular Review	Deposit Ops – AML Software	BSA Coordinator & BSA Officer	Online Training	
10	314 (a) Information Sharing	Automated AML Software scan	Deposit Operations	Online Training	
11	314 (b) Information Sharing	Not applicable	Not applicable	Not applicable	
12	Wire Transfers	Funds Administrator	Funds Manager	Online Training and Fiserv	
13	BSA Record Retention	Department managers	BSA Coordinator	Online Training	
14	Suspicious Activity Reports	Deposit Operations	BSA Coordinator and BSA Officer	Online Training and industry seminars	
15	ACH Review for AML purposes	Electronic Banking	BSA Coordinator and BSA Officer	Online Training and industry seminars	

Reviewer: _____

Date: _____