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Description of document: Federal Financial Institutions Examination Council (FFIEC) Meeting Minutes and agendas for each meeting of the Bank Secrecy Act - Anti-Money Laundering Working Group (BSA/AML), October 2019 - August 2021

Requested date: 11-August-2021

Release date: 22-November-2021

Posted date: 12-September-2022

Source of document: FOIA Request
FFIEC
Attn: Executive Secretary
3501 Fairfax Drive, Room E-2035-C
Arlington, VA, 22226-3550
Email: FOIA@ffiec.gov
FOIA.gov

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November 22, 2021

RESPONSE VIA EMAIL ONLY

FFIEC FOIA Log Number: FFIEC-021-008

This is in response to your request made on August 11, 2021, through the National FOIA Portal and received via email at the FFIEC, by way of which you requested to the Federal Financial Institutions Examination Council (FFIEC) records pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. § 552(a)(3). Per our emails to you on September 9, 2021 and September 23, 2021, the FFIEC informed you of the extension of time needed to respond to your FOIA request (FFIEC-021-008). Specifically, you requested: “[a] copy of the meeting minutes and agendas for each meeting of the BSA/AML (bank secrecy act/anti-money laundering) Working Group, during the time period October 1, 2019 to the present.”

FFIEC staff searched for records responsive to your request and located 124 pages of responsive records through November 21, 2021. Your FOIA request is granted in part and denied in part, as detailed below.

96 pages of responsive records, consisting of FFIEC BSA/AML Working Group meeting minutes, are withheld fully as exempt from public release. The withheld information is exempt from FOIA release under one or more of the exemptions at 5 U.S.C. § 552(b)(2),(5),(6) and (8), as discussed below. We will release to you 28 pages of responsive records, consisting of FFIEC BSA/AML Working Group agendas. Portions of those agendas will be redacted under one or more of the FOIA exemptions at 5 U.S.C. § 552(b)(2),(5),(6) and (8), as explained below, before release to you.

Subsection (b)(2) authorizes an agency to withhold records that are "related solely to the internal personnel rules and practices of an agency." Withheld or redacted information includes material related to FFIEC's internal personnel practices such as making conference calls and meeting preparations.

Subsection (b)(5) protects "inter-agency or intra-agency memorandums or letters that would not be available by law to a party other than an agency in litigation with the agency." Among the traditional privileges incorporated within Exemption 5 is the deliberative process privilege, which applies to documents that reflect deliberations that are part of an internal agency decision making process. See *NLRB v. Sears, Roebuck & Co.*, 421 U.S. 132, 151 (1975). Documents may retain their pre-decisional character so long as they are generated as part of a continuous process of agency decision-making. The deliberative process privilege protects the free give-and-take that occurs as a decision is being made, such as the expression of opinion and analysis by agency staff serving on the FFIEC BSA/AML Working Group. See *Coastal States Gas Corp. v. Dept. of Energy*, 617 F.2d 854, 866 (D.C. Cir. 1980); *Lewis-Bey v. Dep't of Justice*, 1595 F. Supp. 2d 120,

133 (D.D.C. 2009) (protecting documents in which release “would have the effect of inhibiting the free flow of recommendations and opinions” (citation omitted)). The work of the Working Group, by nature, involves deliberations leading to pre-decisional recommendations made to the leadership of federal and state regulatory bodies that the Council serves.

Subsection (b)(6) allows an agency to withhold information about individuals where the disclosure of such information "would constitute a clearly unwarranted invasion of personal privacy." In making this determination, the individual's privacy interests are balanced against the public's interest in having the information disclosed. See *U.S. Dept. of State v. Washington Post Co.*, 456 U.S. 595, 599 (1982). Material withheld or redacted pursuant to Exemption 6 includes personal or private information about agency staff, including individual email addresses and telephone numbers.

Subsection (b)(8) protects matters that are “contained in or related to examination, operating, or condition reports prepared by, on behalf of, or for the use of an agency responsible for the regulation or supervision of financial institutions.” Courts have construed Exemption 8 broadly. In addition to examination reports themselves, matters that are “related to” such reports—that is, documents that “represent the foundation of the examination process, the findings of such an examination, or its follow-up”—have been held exempt from disclosure. *Atkinson v. FDIC*, 1980 WL 355660, *1 (D.D.C. Feb. 13, 1980). Information subject to redaction or withholding pursuant to Exemption 8 includes information relating to review and assessment of examination procedures, examiner training issues, and examination policy and strategy, and scope and content of examinations of various institutions.

RESPONSE VIA EMAIL ONLY

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96 pages of responsive records, consisting of FFIEC BSA/AML Working Group meeting minutes, are withheld fully as exempt from public release. The withheld information is exempt

from FOIA release under one or more of the exemptions at 5 U.S.C. § 552(b)(2),(5),(6) and (8), as discussed below. We will release to you 28 pages of responsive records, consisting of FFIEC BSA/AML Working Group agendas. Portions of those agendas will be redacted under one or more of the FOIA exemptions at 5 U.S.C. § 552(b)(2),(5),(6) and (8), as explained below, before release to you.

Subsection (b)(2) authorizes an agency to withhold records that are "related solely to the internal personnel rules and practices of an agency." Withheld or redacted information includes material related to FFIEC's internal personnel practices such as making conference calls and meeting preparations.

Subsection (b)(5) protects "inter-agency or intra-agency memorandums or letters that would not be available by law to a party other than an agency in litigation with the agency." Among the traditional privileges incorporated within Exemption 5 is the deliberative process privilege, which applies to documents that reflect deliberations that are part of an internal agency decision making process. See *NLRB v. Sears, Roebuck & Co.*, 421 U.S. 132, 151 (1975). Documents may retain their pre-decisional character so long as they are generated as part of a continuous process of agency decision-making. The deliberative process privilege protects the free give-and-take that occurs as a decision is being made, such as the expression of opinion and analysis by agency staff serving on the FFIEC BSA/AML Working Group. See *Coastal States Gas Corp. v. Dept. of Energy*, 617 F.2d 854, 866 (D.C. Cir. 1980); *Lewis-Bey v. Dep't of Justice*, 1595 F. Supp. 2d 120, 133 (D.D.C. 2009) (protecting documents in which release "would have the effect of inhibiting the free flow of recommendations and opinions" (citation omitted)). The work of the Working Group, by nature, involves deliberations leading to pre-decisional recommendations made to the leadership of federal and state regulatory bodies that the Council serves.

Subsection (b)(6) allows an agency to withhold information about individuals where the disclosure of such information "would constitute a clearly unwarranted invasion of personal privacy." In making this determination, the individual's privacy interests are balanced against the public's interest in having the information disclosed. See *U.S. Dept. of State v. Washington Post Co.*, 456 U.S. 595, 599 (1982). Material withheld or redacted pursuant to Exemption 6 includes personal or private information about agency staff, including individual email addresses and telephone numbers.

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For the reasons discussed above, your FOIA request is granted in part, but denied to the extent of the material redacted or withheld under the FOIA exemptions at 5 U.S.C. § 552(b)(2),(5),(6) and (8). Please know that the redactions are in-process for the responsive records that are releasable but will take some time. As the FFIEC relies on FOIA staff from its member agencies we are coordinating on the redactions and will send those records to you, via email in PDF, as soon as

completed. We will send you a follow-up notice when we have a more exact timeframe for when we expect to furnish the redacted records to you.

If you are not satisfied with the response to this request, you may administratively appeal this decision to the Chair of the Council within 90 days of the date of this response. If you decide to appeal, please submit your appeal in writing to the Chair of the FFIEC at the following address: FFIEC, Attn: Executive Secretary, 3501 Fairfax Drive, Room B7081a, Arlington, VA, 22226-3550. Both the mailing envelope and the request should be marked "Freedom of Information Act Appeal," "FOIA Appeal," or the like. An appeal can be filed by an email reply to this correspondence with the subject line marked "Freedom of Information Act Appeal,"; "FOIA Appeal." Please refer to your FFIEC FOIA log number, the date of the original request and the date of this response in the appeal. You should also include an explanation of the basis for the appeal and any additional information that you would like the Chair to consider.

Alternatively, you may contact the Office of Government Information Services (OGIS) at the National Archives and Records Administration to inquire about the FOIA mediation services they offer (contact details below).

Office of Government Information Services
National Archives and Records Administration
8601 Adelphi Road-OGIS
College Park, MD 20740-6001
Email: ogis@nara.gov
Telephone: (202) 741-5770 or (877) 684-6448 (toll free)
Facsimile: (202) 741-5769

If you have any questions about this response you can reach the FFIEC FOIA Public Liaison, Rosanna Piccirilli, by email at rpiccirilli@fdic.gov, or by phone at 703.516.5591.

Respectfully,

Judith Dupre, Executive Secretary, FFIEC
www.ffiec.gov

For the reasons discussed above, your FOIA request is granted in part, but denied to the extent of the material redacted or withheld under the FOIA exemptions at 5 U.S.C. § 552(b)(2),(5),(6) and (8). Please know that the redactions are in-process for the responsive records that are releasable but will take some time. As the FFIEC relies on FOIA staff from its member agencies we are coordinating on the redactions and will send those records to you, via email in PDF, as soon as completed. We will send you a follow-up notice when we have a more exact timeframe for when we expect to furnish the redacted records to you.

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Respectfully,

Judith Dupre, Executive Secretary, FFIEC
www.ffiec.gov

AGENDA

FFIEC BSA/AML Working Group Call

Wednesday, April 8, 2020 | 10:00AM – 12:00PM

(b)(2)

Item	Presenters
1. FFIEC BSA/AML Working Group Meeting Minutes a. Motion to approve the February 6 and March 11, 2020 Minutes	FBAs
2. BSA Reform/Regulatory Reform Working Group (RRWG) Presentation	FBAs & FinCEN
3. BSA/AML Examination Manual Update and Webinars	FBAs
4. GAO Audits Status	FBAs
5. (b)(8); (b)(5)	
6. (b)(5); (b)(8)	
7. (b)(8); (b)(5)	
8. Other Business	All
9. Next meeting(s): <ul style="list-style-type: none">Monthly meeting on May 13, 2020 – Conference Call.	

QUESTIONS/COMMENTS?

AGENDA

FFIEC BSA/AML Working Group Call

Wednesday, April 14, 2021 | 10:00AM – 11:30AM

(b)(2)

Item	Presenters
1. FFIEC BSA/AML Working Group Meeting Minutes <ul style="list-style-type: none">a. Motion to approve the March 18, 2021 Minutes	FBAs
2. BSA Regulatory Reform Working Group (RRWG) Updates <ul style="list-style-type: none">• MRMG RFI and Statement (FRB, OCC)• NPRM on Exemptions from the SAR Rule (OCC)	FBAs & FinCEN
3. AML Act Implementation Update	FinCEN
4. BSA/AML Examination Manual Project Update	FBAs
5. FFIEC BSA/AML Advanced Specialists Conference Update	FFIEC
6. Other Business	All
7. Next meeting(s): <ul style="list-style-type: none">• Monthly meeting on May 12, 2021 – Conference Call.	

QUESTIONS/COMMENTS?

AGENDA

FFIEC BSA/AML Working Group Call

Wednesday, August 12, 2020 | 10:00AM – 11:30AM

(b)(2)

Item	Presenters
1. FFIEC BSA/AML Working Group Meeting Minutes a. Motion to approve the July 8, 2020 Minutes	FBAs
2. BSA Regulatory Reform Working Group (RRWG) Updates <div data-bbox="228 867 963 1213" style="border: 1px solid black; padding: 20px; text-align: center;">(b)(5); (b)(8)</div>	FBAs & FinCEN
3. BSA/AML Examination Manual Project Update	FBAs
4. GAO Audits Status	FBAs
5. Other Business	All
6. Next meeting(s): <ul style="list-style-type: none">Monthly meeting on September 9, 2020 – Conference Call.	

QUESTIONS/COMMENTS?

AGENDA

FFIEC BSA/AML Working Group Call

Wednesday, August 18, 2021 | 10:00AM – 11:30AM

(b)(2)

Item	Presenters
1. FFIEC BSA/AML Working Group Meeting Minutes <ul style="list-style-type: none">• Motion to approve the July 14, 2021 minutes	FBA's
2. AML Act Implementation Update	FinCEN
3. BSA/AML Examination Manual Project Update	FDIC
4. (b)(5); (b)(8)	
5. Other Business	All
6. Next meeting(s): <ul style="list-style-type: none">• Monthly meeting on Wednesday September 8, 2021 – Conference Call.• Quarterly meeting on Wednesday October 13, 2021 – Conference Call.	

QUESTIONS/COMMENTS?

*Please email (b)(6) with your agency's attendance after the call.
Thank you.

AGENDA

FFIEC BSA/AML Working Group Call

Wednesday, December 16, 2020 | 10:30AM – 12:00PM

(b)(2)

Item	Presenters
1. FFIEC BSA/AML Working Group Meeting Minutes <ol style="list-style-type: none">a. Motion to approve the October 14, 2020 Minutesb. Motion to approve the November 18, 2020 Minutes	FBAs
2. BSA Regulatory Reform Working Group (RRWG) Updates <div style="border: 1px solid black; padding: 10px; text-align: center;">(b)(5); (b)(8)</div>	FBAs & FinCEN
3. BSA/AML Examination Manual Project Update	FBAs
4. GAO Audits Status	FBAs
5. <div style="border: 1px solid black; padding: 10px; text-align: center;">(b)(5)</div>	
6. Other Business <div style="border: 1px solid black; padding: 10px; text-align: center;">(b)(5)</div>	All
7. Next meeting(s): <ul style="list-style-type: none">• Quarterly meeting on January 13, 2021 – Conference Call.	

QUESTIONS/COMMENTS?

AGENDA

FFIEC BSA/AML Working Group Call

Thursday, February 6, 2020 | 10:00AM – 12:00PM

(b)(2)

Item	Presenters
1. FFIEC BSA/AML Working Group Meeting Minutes a. Motion to approve the January 8, 2020 Minutes	FBAs
2. Regulatory Reform Working Group (RRWG)	FinCEN & FBA's
3. BSA/AML Examination Manual Update and Webinars	FBAs
4. GAO Audits Status	FBAs
5. (b)(5); (b)(8)	
6. (b)(5); (b)(8)	
7. Other Business	All
8. Next meeting(s): <ul style="list-style-type: none">Monthly meeting on March 11, 2020 – Conference Call.	

QUESTIONS/COMMENTS?

AGENDA

FFIEC BSA/AML Working Group Call

Wednesday, February 10, 2021 | 10:00AM – 11:30AM

(b)(2)

Item	Presenters
1. FFIEC BSA/AML Working Group Meeting Minutes a. Motion to approve the January 13, 2021 Minutes	FBA's
2. BSA Regulatory Reform Working Group (RRWG) Updates (b)(8); (b)(5)	FBA's & FinCEN
3. BSA/AML Examination Manual Project Update	FBA's
4. BSA/AML Conference Update	FFIEC
5. (b)(5)	
6. OCC Interpretive Letter 1175 – <u>CIP Exemption for Internet Gateway Providers</u>	OCC
7. Proposed Rule <ul style="list-style-type: none">• Cryptocurrency NPRM (FinCEN)• Travel Rule NPRM (FinCEN & FRB)	FinCEN & FRB
8. (b)(5); (b)(8)	
9. Other Business	All
10. Next meeting(s): <ul style="list-style-type: none">• Monthly meeting on March 17, 2021 – Conference Call.	

QUESTIONS/COMMENTS?

AGENDA

FFIEC BSA/AML Working Group Call

Wednesday, January 13, 2021 | 10:00AM – 11:30AM

(b)(2)

Item	Presenters
1. FFIEC BSA/AML Working Group Meeting Minutes a. Motion to approve the December 16, 2020 Minutes	FBA's
2. BSA Regulatory Reform Working Group (RRWG) Updates (b)(5); (b)(8)	FBA's & FinCEN
3. BSA/AML Examination Manual Project Update	FBA's
4. National Defense Authorization Act (NDAA)	OCC
(b)(5); (b)(8)	
6. Other Business	All
7. Next meeting(s): <ul style="list-style-type: none">Monthly meeting on February 10, 2021 – Conference Call.	

QUESTIONS/COMMENTS?

AGENDA

FFIEC BSA/AML Working Group Call

Wednesday, July 8, 2020 | 10:00AM – 12:00PM

(b)(2)

Item	Presenters
1. FFIEC BSA/AML Working Group Meeting Minutes a. Motion to approve the June 10, 2020 Minutes	FBAs
2. BSA Regulatory Reform Working Group (RRWG) Updates <div data-bbox="240 919 963 1184" style="border: 1px solid black; padding: 10px; text-align: center;">(b)(8); (b)(5)</div>	FBAs & FinCEN
3. FFIEC BSA/AML Specialists Conference	FFIEC
4. BSA/AML Examination Manual Project Update	FBAs
5. GAO Audits Status	FBAs
6. <div data-bbox="191 1640 1386 1745" style="border: 1px solid black; padding: 10px; text-align: center;">(b)(5); (b)(8)</div>	

Item	Presenters
7.	(b)(5); (b)(8)
8.	Other Business
All	
9.	Next meeting(s):
	<ul style="list-style-type: none">Monthly meeting on August 12, 2020 – Conference Call.
All	

QUESTIONS/COMMENTS?

AGENDA

FFIEC BSA/AML Working Group Call

Wednesday, July 14, 2021 | 10:00AM – 11:30AM

(b)(2)

Item	Presenters
1. FFIEC BSA/AML Working Group Meeting Minutes a. Motion to approve the June 16, 2021 minutes	FBA's
2. AML Act Implementation Update • Requirement for training (b)(8); (b)(5)	FinCEN
3. BSA/AML Examination Manual Project Update	FDIC
4. FFIEC BSA/AML Advanced Specialists Conference Update	FFIEC
5. NPRM on Exemptions from the SAR Rule	OCC
6. (b)(5)	
7. Other Business	All
8. Next meeting(s): • Monthly meeting on Wednesday August 18, 2021 – Conference Call.	

QUESTIONS/COMMENTS?

*Please email (b)(6) with your agency's attendance after the call.

Thank you.

AGENDA

FFIEC BSA/AML Working Group Call

Wednesday, June 10, 2020 | 10:00AM – 12:00PM

(b)(2)

Item	Presenters
1. FFIEC BSA/AML Working Group Meeting Minutes a. Motion to approve the April 8, 2020 Minutes b. Motion to approve the May 13, 2020 Minutes	FBAs
2. BSA Regulatory Reform Working Group (RRWG) Updates <div data-bbox="240 978 959 1230" style="border: 1px solid black; padding: 10px; text-align: center;">(b)(5); (b)(8)</div>	FBAs & FinCEN
3. FFIEC BSA/AML Specialists Conference	FFIEC
4. BSA/AML Examination Manual Project Update	FBAs
5. GAO Audits Status	FBAs
6. National Defense Authorization Act of Fiscal Year 2020	FDIC
7. <div data-bbox="188 1822 1390 1902" style="border: 1px solid black; padding: 10px; text-align: center;">(b)(5); (b)(8)</div>	

Item	Presenters
8.	(b)(5)
9.	(b)(5); (b)(8)
10. Other Business	All
11. Next meeting(s): <ul style="list-style-type: none">Monthly meeting on July 8, 2020 – Conference Call.	All

QUESTIONS/COMMENTS?

AGENDA

FFIEC BSA/AML Working Group Call

Wednesday, June 16, 2021 | 10:00AM – 11:30AM

(b)(2)

Item	Presenters
1. FFIEC BSA/AML Working Group Meeting Minutes <ul style="list-style-type: none">a. Motion to approve the April 14, 2021 minutesb. Motion to approve the May 12, 2021 minutes	FBAs
2. AML Act Implementation Update <ul style="list-style-type: none">• Requirement for training	FinCEN
3. BSA/AML Examination Manual Project Update	FDIC
4. FFIEC BSA/AML Advanced Specialists Conference Update	FFIEC
5. NPRM on Exemptions from the SAR Rule	OCC
6. (b)(5)	
7. Other Business	All
8. Next meeting(s): <ul style="list-style-type: none">• Monthly meeting on Wednesday July 14, 2021 – Conference Call.	

QUESTIONS/COMMENTS?

*Please email (b)(6) with your agency's attendance after the call.

Thank you.

AGENDA

FFIEC BSA/AML Working Group Call

Wednesday, March 11, 2020 | 10:00AM – 12:00PM

(b)(2)

Item	Presenters
1. FFIEC BSA/AML Working Group Meeting Minutes a. Motion to approve the February 6, 2020 Minutes	FBAs
2. Regulatory Reform Working Group (RRWG)	FinCEN & FBAs
3. BSA/AML Examination Manual Update and Webinars	FBAs
4. GAO Audits Status	FBAs
5. (b)(5); (b)(8)	
6. (b)(8); (b)(5)	
7. Other Business	All
8. Next meeting(s): <ul style="list-style-type: none">Monthly meeting on April 8, 2020 – In-Person at OCC Headquarters.	

QUESTIONS/COMMENTS?

AGENDA

FFIEC BSA/AML Working Group Call

Thursday, March 18, 2021 | 10:00AM – 11:30AM

(b)(2)

Item	Presenters
1. FFIEC BSA/AML Working Group Meeting Minutes a. Motion to approve the February 10, 2021 Minutes	FBA's
2. BSA Regulatory Reform Working Group (RRWG) Updates (b)(8); (b)(5)	FRB & OCC
3. AML Act Implementation Update	FinCEN
4. BSA/AML Examination Manual Project Update	FBA's
5. BSA/AML Advanced BSA/AML Conference Update	FFIEC
6. (b)(5)	
7. (b)(5); (b)(8)	
8. FFIEC BSA/AML Working Group Chairmanship Transition	FBA's
9. Other Business	All
10. Next meeting(s): <ul style="list-style-type: none">Quarterly meeting on April 14, 2021 – Conference Call.	

QUESTIONS/COMMENTS?

AGENDA

FFIEC BSA/AML Working Group Call

Wednesday, May 12, 2021 | 10:00AM – 11:30AM

(b)(2)

Item	Presenters
1. FFIEC BSA/AML Working Group Meeting Minutes <ul style="list-style-type: none">a. Motion to approve the April 14, 2021 Minutes	FBAs
2. BSA Regulatory Reform Working Group (RRWG) Updates <div style="border: 1px solid black; padding: 2px; display: inline-block;">(b)(5); (b)(8)</div>	FBAs & FinCEN
3. AML Act Implementation Update <ul style="list-style-type: none">• Requirement for training (FDIC)	FinCEN
4. BSA/AML Examination Manual Project Update	FBAs
5. FFIEC BSA/AML Advanced Specialists Conference Update	FFIEC
6. Other Business	All
7. Next meeting(s): <ul style="list-style-type: none">• Monthly meeting on Wednesday June 16, 2021 – Conference Call.	

QUESTIONS/COMMENTS?

AGENDA

FFIEC BSA/AML Working Group Call

Wednesday, May 13, 2020 | 10:00AM – 12:00PM

(b)(2)

Item	Presenters
1. FFIEC BSA/AML Working Group Meeting Minutes a. Motion to approve the April 8, 2020 Minutes	FBA's
2. BSA Regulatory Reform Working Group (RRWG) Updates	FBA's & FinCEN
3. BSA/AML Examination Manual Project Update	FBA's
4. GAO Audits Status	FBA's
5. FFIEC BSA/AML Specialists Conference	FFIEC
6. (b)(5)	
7. (b)(5); (b)(8)	
8. Other Business	All
9. Next meeting(s): <ul style="list-style-type: none">• Monthly meeting on June 10, 2020 – Conference Call.	

QUESTIONS/COMMENTS?

AGENDA

FFIEC BSA/AML Working Group Call

Thursday, November 14, 2019 | 10:00 AM – 12:00 PM

(b)(2)

Item	Presenters
1. FFIEC BSA/AML Working Group Meeting Minutes a. Motion to approve the October 10, 2019 Minutes	FBAs
2. Regulatory Reform Working Group (RRWG)	FinCEN & FBA's
3. BSA/AML Examination Manual Update and Webinars	FBAs
4. GAO Audits Status	FBAs
5. <div style="border: 1px solid black; padding: 2px; display: inline-block;">(b)(5); (b)(8)</div>	
6. Other Business	All
7. Next meeting(s): <ul style="list-style-type: none">Monthly meeting on December 11 or 12, 2019 – Conference Call.	

QUESTIONS/COMMENTS?

AGENDA

FFIEC BSA/AML Working Group Call

Wednesday, November 18, 2020 | 10:00AM – 11:30AM

(b)(2)

Item	Presenters
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2. BSA Regulatory Reform Working Group (RRWG) Updates (b)(8); (b)(5)	FBAs & FinCEN
3. BSA/AML Examination Manual Project Update	FBAs
4. GAO Audits Status	FBAs
5. (b)(5); (b)(8)	
6. (b)(5); (b)(8)	
7. Other Business	All
8. Next meeting(s): <ul style="list-style-type: none">Monthly meeting on December 16, 2020 – Conference Call.	

QUESTIONS/COMMENTS?

AGENDA

FFIEC BSA/AML Working Group Call

Thursday October 10, 2019 | 01:30 PM – 03:30 PM

(b)(2)

Item	Presenters
1. FFIEC BSA/AML Working Group Meeting Minutes a. Motion to approve the September 11, 2019 Minutes	FBAs
2. Regulatory Reform Working Group (RRWG)	FinCEN & FBA's
3. (b)(5); (b)(8)	
4. GAO Audits Status	FBAs
5. BSA/AML Examination Manual Update	FBAs
6. (b)(5); (b)(8)	
7. Other Business	
8. Next meeting(s): <ul style="list-style-type: none">• Monthly meeting on November 13, 2019 – Conference Call.	

QUESTIONS/COMMENTS?

AGENDA

FFIEC BSA/AML Working Group Call

Wednesday, October 13, 2021 | 10:00AM – 11:00AM

(b)(2)

Item	Presenters
1. FFIEC BSA/AML Working Group Meeting Minutes <ul style="list-style-type: none">• Motion to approve the August 18, 2021 minutes• Motion to approve the September 15, 2021 minutes	FBA's
2. AML Act Implementation Update	FinCEN
3. BSA/AML Examination Manual Project Update	FDIC
4. Other Business	All
5. Next meeting(s): <ul style="list-style-type: none">• Monthly meeting on Wednesday November 10, 2021 – Conference Call.	

QUESTIONS/COMMENTS?

*Please email (b)(6) with your agency's attendance after the call.
Thank you.

AGENDA

FFIEC BSA/AML Working Group Call

Wednesday, October 14, 2020 | 10:00AM – 11:30AM

(b)(2)

Item	Presenters
1. FFIEC BSA/AML Working Group Meeting Minutes a. Motion to approve the September 9, 2020 Minutes	FBAs
2.a BSA Regulatory Reform Working Group (RRWG) Updates Published: <ul style="list-style-type: none">• CIP Exemption for Insurance Premium Finance Loans (October 9th)• ANPRM on Effectiveness (September 16th)• Politically Exposed Persons (PEP) Statement (August 21st)• Joint Statement On Enforcement Of BSA/AML Requirements (August 13th)	FBAs & FinCEN
(b)(5); (b)(8)	
2.b	(b)(5)
3. BSA/AML Examination Manual Project Update	FBAs
4. GAO Audits Status – (CDD/BO)	ALL
5.	(b)(5); (b)(8)
6. National Defense Authorization Act and Illicit Cash Act	OCC
7. Other Business	ALL

Item

Presenters

8. Next meeting(s):

- Monthly meeting on November 18, 2020 – Conference Call.

QUESTIONS/COMMENTS?

AGENDA

FFIEC BSA/AML Working Group Call

Wednesday, September 9, 2020 | 10:00AM – 11:30AM

(b)(2)

Item	Presenters
1. FFIEC BSA/AML Working Group Meeting Minutes a. Motion to approve the August 12, 2020 Minutes	FBAs
2. BSA Regulatory Reform Working Group (RRWG) Updates <div data-bbox="245 867 971 1108" style="border: 1px solid black; padding: 10px; text-align: center;">(b)(5); (b)(8)</div>	FBAs & FinCEN
3. BSA/AML Examination Manual Project Update	FBAs
4. GAO Audits Status	FBAs
5. <div data-bbox="196 1388 1360 1465" style="border: 1px solid black; padding: 5px; text-align: center;">(b)(8); (b)(5)</div>	
6. Other Business	All
7. Next meeting(s): <ul style="list-style-type: none">Monthly meeting on October 14, 2020 – Conference Call.	

QUESTIONS/COMMENTS?

AGENDA

FFIEC BSA/AML Working Group Call

Wednesday, September 15, 2021 | 10:30AM – 11:30AM

(b)(2)

Item	Presenters
1. FFIEC BSA/AML Working Group Meeting Minutes <ul style="list-style-type: none">• Motion to approve the August 18, 2021 minutes	FBA's
2. AML Act Implementation Update	FinCEN
3. BSA/AML Examination Manual Project Update	FDIC
4. (b)(5)	
5. (b)(5)	
6. (b)(8); (b)(5)	
7. Other Business	All
8. Next meeting(s): <ul style="list-style-type: none">• Quarterly meeting on Wednesday October 13, 2021 – Conference Call.	

QUESTIONS/COMMENTS?

*Please email (b)(6) with your agency's attendance after the call.

Thank you.

AGENDA

FFIEC BSA/AML Working Group Call

Thursday, December 12, 2019 | 10:00 AM – 12:00 PM

(b)(2)

Item	Presenters
1. FFIEC BSA/AML Working Group Meeting Minutes a. Motion to approve the November 14, 2019 Minutes	FBAs
2. Regulatory Reform Working Group (RRWG)	FinCEN & FBA's
3. BSA/AML Examination Manual Update and Webinars	FBAs
4. GAO Audits Status	FBAs
5. (b)(5); (b)(8)	
6. Other Business	All
7. Next meeting(s): <ul style="list-style-type: none">Monthly meeting on January 8, 2020 – Conference Call.	

QUESTIONS/COMMENTS?

AGENDA

FFIEC BSA/AML Working Group Call

Wednesday, January 8, 2020 | 10:00AM – 12:00PM

In-Person Meeting @ OCC Conference Room 1W-210

(b)(2)

Item	Presenters
1. FFIEC BSA/AML Working Group Meeting Minutes a. Motion to approve the December 12, 2019 Minutes	FBA's
2. Regulatory Reform Working Group (RRWG)	FinCEN & FBA's
3. BSA/AML Examination Manual Update and Webinars	FBA's
4. GAO Audits Status	FBA's
5. (b)(5); (b)(8)	
6. (b)(8); (b)(5)	
7. Other Business	All
8. Next meeting(s): <ul style="list-style-type: none">Monthly meeting on February 12, 2020 – Conference Call.	

QUESTIONS/COMMENTS?