

Habitat for Humanity of Catawba Valley

Anti-Money Laundering Audit Checklist

Name of person conducting audit

Audit Date

Audit Period

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Initial Analysis:

1 Affiliate name and address:

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2 Number of employees:

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3 Number of registered QLOs:

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4 Name of AML Compliance Officer:

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5 Date Officer Assumed Responsibility:

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6 Number of SARs filed during review period:

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Independence and Qualifications Test:

YES

NO

7 Is the auditor the AML Compliance Officer?

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8 Is the auditor responsible for reconciling the affiliate's bank accounts?

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9 Is the auditor responsible for wire transfers for the affiliate?

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10 Is the auditor responsible for auditing the affiliate's financial statements?

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11 Is the auditor adequately knowledgeable about the AML rules that apply to the affiliate?

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General Policy:

YES

NO

12 Does the affiliate prohibit all persons associated with the affiliate from engaging in money laundering or other organized illegal activity?

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13 Is the affiliate and its management firmly committed to preventing money laundering or terrorist financing activities by any of its clients, employees, volunteers, vendors, or contractors?

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14 Does the Compliance Officer feel they have adequate knowledge of AML rules that apply to the affiliate?

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		YES	NO
15	Do affiliate management and employees feel they have adequate knowledge of the affiliate's AML rules and obligations?		
16	Do affiliate management and employees express their support for the affiliate's AML program?		
17	Was AML Risk Assessment performed in the last 18 months?		
18	Did the affiliate conduct an AML audit within the past 12 months?		
19	Was the previous auditor an independent auditor?		
20	Did the affiliate maintain record of the previous audit?		
21	Did the affiliate correct all issues noted in the previous audit?		

SAR filings and red flag reports:

		YES	NO
22	Are AML related documents kept in a secure location separate from other affiliate documents?		
23	Do red flag reports files show evidence of timely completion of investigations?		
24	Do SAR files show evidence of proper completion, timely filing, and accurate recordkeeping?		
25	Do records of law enforcement document requests, subpoenas, summons, or other court filings show evidence of proper maintenance?		

OFAC and CIP records:

		YES	NO
26	Does affiliate have record of OFAC Sanction List search on all potential new clients for the past 5 years?		
27	Does affiliate have 5 years of records of annual OFAC Sanction List search on existing clients?		

	YES	NO
28 Does affiliate have 5 years of records of meeting proper minimum ID requirements (Name, Address, DOB, Unexpired Government Issued Photo ID & Tax ID # for each client)?	<input type="checkbox"/>	<input type="checkbox"/>
ReStore documentation:		
29 Does the ReStore maintain secure, confidential documentation of suspicious activity found, including red flag reports filed to the Compliance Officer?	<input type="checkbox"/>	<input type="checkbox"/>
Donation documentation:		
30 Does the development staff maintain secure, confidential documentation of suspicious activity found, including red flag reports filed to the Compliance Officer?	<input type="checkbox"/>	<input type="checkbox"/>
Staff management:		
31 Have all appropriate background checks been run on applicable staff?	<input type="checkbox"/>	<input type="checkbox"/>
Vendor management:		
32 Does staff have record of appropriate background checks on applicable vendors and contractors?	<input type="checkbox"/>	<input type="checkbox"/>
Volunteer management:		
33 Have all appropriate background checks been run on applicable volunteers?	<input type="checkbox"/>	<input type="checkbox"/>
34 Have applicable volunteers received AML training in the past 12 months?	<input type="checkbox"/>	<input type="checkbox"/>
Training:		
35 Did the affiliate conduct AML training with applicable staff and volunteers within the past 12 months?	<input type="checkbox"/>	<input type="checkbox"/>
Did the training cover the following topics?		
36 - How to identify red flags	<input type="checkbox"/>	<input type="checkbox"/>
37 - What to do if a red flag is identified	<input type="checkbox"/>	<input type="checkbox"/>
38 - Staff roles in the affiliate's AML program	<input type="checkbox"/>	<input type="checkbox"/>
39 - The affiliate's AML recordkeeping policy	<input type="checkbox"/>	<input type="checkbox"/>
40 - Who is the affiliate compliance officer	<input type="checkbox"/>	<input type="checkbox"/>

	YES	NO
41 - Disciplinary consequences for violation of the BSA/AML program	<input type="checkbox"/>	<input type="checkbox"/>
42 Did the affiliate document every person who completed the AML training?	<input type="checkbox"/>	<input type="checkbox"/>
43 Did the affiliate maintain copies of the training materials used?	<input type="checkbox"/>	<input type="checkbox"/>

Narrative section/ comments: