

“Enhanced Due Diligence” (EDD)

April 8, 2008

Spec Writer: Dawn Moore / Jim Vilker

Systems Affected:

CU*BASE

Project Overview

This project proposes methods to incorporate Customer Due Diligence—also referred to as **Enhanced Due Diligence** (EDD)—processes into CU*BASE. The major components bundled into the project definition are fluid and subject to redefinition as opinions and suggestions are considered. The urgency of these modifications is fueled by regulators requiring CU*BASE clients who are actively supporting commercial accounts to complete their due diligence to meet the guidelines of BSA, primarily associated with Anti-Money Laundering (AML).

A “scoring” or rating matrix will be developed that assigns values to certain factors integral to financial transactions, physical location, business practice, and expected behaviors. Through a series of interview questions based on standard FFIEC-recommended question sets, member scores will be compiled and compared to the risk matrix based on the answers they provide. A member’s rating is updated only at the point the questions are answered, or later, if they are modified via membership info maintenance. (There is no mechanism for batch automated re-scoring at this time.)

The questions will be presented to members according to the Membership Designation - so CUs can designate only certain types of accounts that need to answer the questions. Scores will not be updateable, only the answers to the questions. Questions are answered either during the interview process when creating the membership, or through the Update Membership Info option. The tally of the scores—which will be referred to as the member’s **Enhanced Due Diligence Level**—will be calculated and displayed immediately once all questions have been asked as well as on the Member Inquiry, Phone, and Teller “View of the Member” screen. The CU can define which levels, if any, cause an account comment to be created giving special instructions to tellers and other staff.

Credit unions who elect to use this new audit tool will need to follow internal procedures which include tasks to review accounts which have been flagged to be monitored at least monthly. For example, a Low Risk could indicate no immediate action, but require the MSR to manually create a note in the member’s Audit Tracker. An Extreme Risk could indicate deny membership or freeze accounts. The credit union has full control over the scoring, rating and actions to be taken. These procedures can be documented as part of the Membership Designation configuration.

Calling All Auditors! If you have ideas about the types of reports and/or online inquiry tools that you will need to assist monitoring these special memberships, please pass them on! For example, besides the new Audit Report outlined here, should there be an additional automatic monthly monitoring report? If so, what should the report show? Or should there be an online inquiry tool similar to the BSA inquiry (MNGELE #25)? If so, what should be on the inquiry? How often should it be refreshed? What work will need to be recorded when working these membership - will an Audit Tracker conversation note be adequate or is more data required? Where would the data be recorded?

Practices currently in operation in two of our credit unions (both are commercial lenders) are manual and have no automated tracking, identification, or monitoring capabilities. This proposal is based on existing procedures currently in existence at these credit unions and transforming these procedures into question sets, household data elements, and tracking reports. Although it appears the regulation and

auditor focus is on commercial accounts, the scope of this project recognizes both organizational and individual accounts. Credit unions will be able to adapt this new tool and internal procedures regardless of membership or account type.

Key Project Components

	<u>Page</u>
Interview Process, Populating the Database, Flagging Member Accounts.....	3
New Database File	3
Changes to Membership Designation Configuration	4
Changes to Open Membership Workflow	5
New EDD Questionnaire Screen / Database	7
Change to Membership Info Screens.....	9
Changes to Update Closed Membership Info	10
EDD Rating Configuration (“Scoring”)	11
Monitoring and Reporting	14
Changes to Inquiry/Phone/Teller.....	14
New Monitoring Report (Based on the Insider/Employee Audit Report).....	15
Menu Changes	17

IMPORTANT: This document contains a proposed solution and is subject to major revisions in design and direction based on the input of our clients as well as our technical development, testing, and documentation teams. CU*Answers does not warrant that the final project implemented will match these project requirements exactly. In other words, everything is subject to change!

Interview Process, Populating the Database, Flagging Member Accounts

New Database File

The data elements will be stored in the household database file (or a new file?). Need to store the answers to the questions (pg 7), last maintained ID/date, and the member's score and calculated EDD level.

Do not want to use the Household database to gather the data (although the data itself can certainly be stored in those files, if appropriate, behind the scenes). The questionnaire should be presented prior to creating the membership, if they want to use the rating as a determining factor in approving the membership. Household enrollment comes much later in the process, after the membership has already been created. Also, adjusting the information later would be easier while working in the membership info screens rather than the household screens, and would be more intuitive there. Plus all of the Household screens are replicated for the loan application process, and it doesn't make sense to put those questions in the loan app, does it?

The following decisions must be considered if developing a new file:

File name (use standard naming convention)	
Description - how will the file be used?	To store answers to the EDD questionnaire
Special file specifications	See Pages 7 and 11 for details
EOM file required?	
Purge criteria to ensure the file is kept clean: Does the file need a daily and/or monthly purge? Can records be purged when the account/membership closes or other activity is done?	Should be kept with the closed membership
Does this file obsolete any other files?	
Sign-off by Jack C and Jody K	

Other things to think about:

- Need to be able to store this information temporarily while setting up a new membership, and then delete it if the membership is denied and never actually opened - including the creating of the account comment, if any

Changes to Membership Designation Configuration

Access: MNCNFC #25 Membership Designation Config.
Program: UMDESGCL
GOLD panel: 4620

NOTE: I believe this screen is also changing with some year-end projects where we are adding a flag to exclude certain accounts from being reported to the IRS. See Lora Goodin to coordinate.

*...+...1...+...2...+...3...+...4...+...5...+...6...+...7...+...8		
4/04/08	Configure Membership Designations CHANGE	16:22:47 UMDESG-02
Code: SP		
Membership Designation:	Sole Proprietorship	
Label for Primary Name:	Owner	
Label for Joint Owner Name:	Co-Owner	
Used for Membership Type (X):	X Individual (MI) X Organization (MO)	
Present Enhanced Due Diligence Questionnaire:	N	
Cmd/3-Backup	Cmd/7-CANCEL	Cmd/21-Procedures

- Add new *Present Enhanced Due Diligence Questionnaire* flag as shown; default to N and require either N or Y

NOTE: I decided NOT to put this flag in Workflow Controls, partly because it really needs to be based on the type of membership, and partly because Workflow Controls are multi-corp and Membership Designations are not, and this seemed less complex and more consistent.

Changes to Open Membership Workflow

Will change the workflow used when creating a new membership or updating membership information on an existing account, as follows. NOTE: The same flow will be used when updating membership information (MNUPDT #1) so that the questions can be modified and a new level calculated at any time (on demand only; no automated re-scoring procedure is planned at this time).

Choose Membership Designation (determines if workflow includes EDD or not)



General membership information (name, address, etc.)

(See *Page ??* for a change when choosing a different Membership Desig. on an existing membership.)



OFAC scan



Blocked Persons scan



Experian ID check (if applicable)



Credit report evaluation (if applicable)



Previous address information (if applicable)

The screenshot shows a web browser window titled 'Session 0 CUMBASE - Update Membership Individual'. The main heading is 'Update Individual Membership'. The form displays membership details for Branch # 05 SOUTH WINDEN BRANCH, Name SUSIE Q HENDES, and Membership # 2007. The 'Previous Address Information' section includes fields for Address #1, Address #2, City (SELECTED), State, Zip (99000), Date moved to, and Check/rent options.



New EDD questionnaire screen (see Page 7)
(displays only if Membership Designation requires it)

level is calculated according to the scoring config when user presses Enter to save



Miscellaneous membership information - revised to display EDD level (see Page 9)

The screenshot shows the 'Update Individual Membership' form with the 'Other Information' section expanded. It contains various fields such as Reason code, Account assoc, Incident/employee type, Check held status, Allow shared branch trans, Exclude from dormancy, Mother's maiden name, Code word, Marital status, and Email address. There are also checkboxes for 'Allow shared branch trans' and 'Exclude from dormancy', and a 'Print' button.



Determination of create or deny
(denial notice can be configured to handle denials based on a high-risk score)

The screenshot shows a web browser window titled 'Session 0 CUMBASE - Verify New Membership Creation'. The main heading is 'Verify Individual Membership Creation'. The form displays membership details for Branch # 05 TOWN CITIES ST. JOE, Name SUS L. NORDNER, and Membership # 2007. At the bottom, there are two buttons: 'Create Membership & Continue (assign next acct #)' and 'Deny Membership'. There are also checkboxes for 'Print summary' and 'Demographics'.

New EDD Questionnaire Screen / Database

Access: When creating a new membership (MNSERV #13) and when updating membership info (MNUPDT #1), if Membership Designation code is configured to require EDD data - also via Closed Membership Information Update (see Page 10)

Program: New

GOLD panel: New

The fields on this questionnaire and the scoring configuration do not have a strict one-to-one correlation, but each potential answer should be able to be given a point value from the config. Add them all together and display the total score as well as the risk level on the next screen.

```

*...+....1....+....2....+....3....+....4....+....5....+....6....+....7....+....8

1  4/07/08          _xxxxxxxxxxxxconditionaltitlexxxxxxxxxxx          14:40:14
2                                     UXXXXX-01
3  Branch No.    01  CU*BASE TRAINING CU BRANCH 01          Mbrship      2200
4  Designation  Individual          Date Opened  4042008
5  Name         BETH SKINNER          SSN         123-45-6789
6  Enhanced Due Diligence Questionnaire          Last modified by xx on xx/xx/xxxx
7  Location code _ 1=Local, 2=Non-local
8     N High Intensity Drug Traffic Area  N High Intensity Financial Crimes Area
9  Length of prior relationship with CU _0 months (0=no prior relationship)
10 How do you plan to access your accounts?
11     N Direct deposit  N Audio response  N Online banking  N Online bill pay
12 How often do you expect to perform wire transfers?
13     _ 1=Occasionally, 2=Repetitively/frequently, 3=None expected
14     What types of wires?  N Wires (U.S.)  N Wires (International)
15     Source of wealth: _ 1=Wage earner, 2=Business principal
16     What type of business is it? _ 1=Normal/other, 2=Money store, 3=Cash intensive
17     Are any of the business principals foreign citizens?  N
18     Are any of the business principals politically exposed?  N
19     Are any of the business principals existing members (with good history)?  N
20     Will you be purchasing monetary instruments such as money orders?  N
21     Estimated weekly deposits .....7  Withdrawals .....7 (whole $)
22
23     Cmd/3-Backup  Cmd/7-CANCEL  Cmd/21-Tracker Review
24

```

The top of this screen was copied from UMBRSHIP-23 (the next screen in sequence - see pg 9). It has a conditional field label for Name.

- The title of this screen should follow the same syntax as UMBRSHIP-21, UMBRSHIP-22, and UMBRSHIP-23 - if you are opening a membership, it reads differently than if you are updating an existing membership. GOLD also tweaks the heading to include the membership designation.
 - Need a version of this screen to be used when accessed via Closed Membership maintenance - see Page 10 - might just need to display the closed date instead of the open date
- Data can either be stored in a new file or as part of the Household database - see Page 3**
 - Be sure to record a *Last modified by* employee ID and date with the other data gathered - update whenever any of the fields on this screen are modified
- When user presses Enter to save and proceed to the next screen (Page 9), calculate the level according to the configuration and display on that screen (will need to store both the score total and the risk level)
 - also generate an **account comment** if appropriate according to the config: comment type 1, purge date 99/99/9999. (Not sure if this is the best point in the flow or not, but it seems like all of the actions should be based on saving on this screen.)

- Cmd/21-Tracker Review should go to the ITKLR-01 Member Tracker Review screen so they can view and/or add notes to the Audit Tracker for this member (that screen has a Tracker Entry command key on it already, too)
- Write out any changes to this screen to CUFMNT, as usual

Field Descriptions

These are all tied to the scoring configuration - see Page 11 for more info about the data fields needed.

<i>Field Name</i>	<i>Description</i>
Location code	Must choose either local or non-local
High Intensity Drug Traffic Area	default to N and require either Y or N - can select both this and the HIFCA at the same time
High Intensity Financial Crimes Area	default to N and require either Y or N - can select both this and the HIDTA at the same time
Length of prior relationship with CU	Default to 0; can be 0-99
How do you plan to access your accounts	4 Y/N fields that should be defaulted to N and require either a Y or N
How often do you plan to use wire transfers?	1, 2, or 3 required
What types of wires?	Entry required if 1 or 2 in previous field
Source of wealth	Entry required; if 1, do not require entry in any subsequent fields; if 2, require entry as described below <input type="checkbox"/> GOLD: If possible, hide all remaining fields until they choose 2=business principal
What type of business is it?	Require entry 1, 2, or 3 if source=2
Are any of the business principals foreign citizens?	default to N and require either Y or N if source=2
Are any of the business principals politically exposed?	default to N and require either Y or N if source=2
Are any of the business principals existing members (with good history)?	default to N and require either Y or N if source=2
Will you be purchasing monetary instruments such as money orders?	default to N and require either Y or N if source=2
Estimated weekly deposits	Require entry (at least \$1) if source=2
Estimated weekly withdrawals	Require entry (at least \$1) if source=2

No mechanism yet to completely remove the question data from a member's record, but I couldn't think of a reason why this would be necessary, really. Just remember that if they are setting up a new membership, and they decide to deny it after all, that the EDD data needs to be deleted. **No plans to attach this data to non-member records at this time.**

Change to Membership Info Screens

Access: MNUPDT #1 or MNSERV #13

Program: ?? (UMBRSL3CL or UMBRCTL are the initial entry programs)

GOLD panel: 4606, 4608 (see pictures on Pg 5)

General Info Screen

```

4/08/08 * Update Membership-Individual 12:56:36
Branch No. 01 CU*BASE TRAINING CU BRANCH 01 UMBRSHIP-21
Designation MI Individual
Acct Base 3709
REQUIRED INFORMATION
Name JOHN MEMBER SSN 456-32-1987 Name ID ME
Foreign Addr (Y/N) N Foreign Citizen (Y/N) N Gender M Birth Date 11011980
Death Date
DBA Name Own/Rent 0
Addr #1 111 TESTSTREET Landlord
Addr #2 Phone#
City TESTCITY St MI Zip 49999 0000
County Incorrect Address (Y/N) N
Date Moved To Addr maint by EmpID ;D on 2012007
Home Phone 616 5551111 Work Phone 616 1324568 Ext
Other Phone Fax
Lic#/St Other ID
Deny Membership N Reason ? Date
Last Contact Date Last Maint Date 2012007 Cass Flag (0/1/9) 0
F3-Backup F7-CANCEL F8-Bypass F11-Unlock Fields
  
```

- If updating an existing membership that has a score recorded, if they use F11-Unlock Fields then change the Membership Designation to one that does NOT require the EDD questionnaire, pop a standard delete confirmation window with a warning message: **“Existing Enhanced Due Diligence Questions and Rating Level will be deleted for this member. Continue?”** - if they choose to continue, then delete the existing data from the database, including the score, last maint date, etc.

Final Misc. Info Screen

```

4/04/08 * Open New Membership-Individual 15:42:15
Branch No. 01 CU*BASE TRAINING CU BRANCH 01 UMBRSHIP-23
Designation Individual Date Opened 4042008
Name BETH SKINNER SSN 123-45-6789
OTHER INFORMATION
Reason 02 ? Mail Codes 0 0 ? Stmt Group (0-9) 0 ? Acct Exec ?
Employee Type 0 ? Employee No. Department/Sponsor # 0001 ?
Certification of SSN C ?
Allow shared branch trans (Y/N) Y
Reference Marital Status (M/S/U) M Tran Source ID
Mother's Maiden Name SS Code Word
Email Address
Enhanced Due Diligence Score xxx Rating HIGH DESCRIPTIONXXXXXXXXXXXXXXXXX30
Cmd/3-Backup Cmd/7-CANCEL Cmd/10-Greeting
  
```

- Add output-only *Enhanced Due Diligence Score* and *Rating* fields on line 20 as shown; display only if the Membership Designation for this account requires EDD data; show the total score calculated and the display code and description for the rating level
 - Make sure the file stores both the total score and the rating (can just store the 1-byte rating level 1, 2, 3, or 4)
- If this membership designation requires EDD, then the Cmd/3-Backup key somehow has to be smart enough to return them to the EDD questionnaire screen - please advise if this is not feasible and we

can discuss alternatives to the flow (i.e., could maybe add a command key to go to the questionnaire screen from here, but would prefer the other method if possible)

- When creating a new membership, will need to somehow remember to create an account comment according to the configuration, if the level is flagged to create a comment (for an existing membership, should create the comment when they press Enter to calculate the score on the previous EDD questionnaire screen)

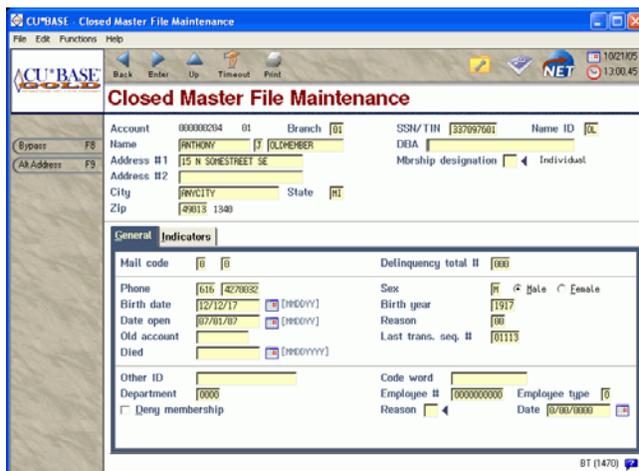
Changes to Update Closed Membership Info

Access: MNUPDA #1
 Program: UCMASSTCL
 GOLD panel: 1470

```

*...+...1...+...2...+...3...+...4...+...5...+...6...+...7...+...8
4/07/08          Closed Master File Maintenance          16:34.07
                                                         UCMASST-02
Account # 000002000 01  Minor MEMBER TEST J
Branch # 01          Address 705 ANYSTREET
Soc Sec # 999991679          City/St THREE OAKS MI
DBA          Zip 49128 - 1177
Dsg CS ? Custodial          Phone 269 5555555 Sex M
Enhanced Due Diligence Score xxx Rating HIGH DESCRIPTIONXXXXXXXXXXXXXXXXX30
Mail Code 0 0          Birth Date 100776 Date Open 051695
Delinquency Total #.. 000 Birth Year 1976          New Acct 56
Member's Name Id .... VO Died
Old Account .....          Indicators
Foreign Citizen (Y/N) N          Wrong Address ..... 0
Last Trans. Seq. # .. 01619 Deny N          Check Return ..... 0
Cass Flag 0/1/9..... 0          Reason ?          Uncollected Account ... 1
          Date 0/00/0000 Foreign Address ..... 0
          Statement Mail Group... 0 ?
Employment Identification
Department 0000          Other ID
Employee No. 0000000000          Dividend Withholding .. N
Employee Type 0          Code Word          Certification Flag .... C
          Proxy (Y/N) ..... N
Cmd/8-Bypass Cmd/9-Alternate Address Cmd/10-EDD Questionnaire
  
```

- If Membership Designation is configured for EDD, or if the member has an EDD level recorded:
 - Add the EDD score, level and description to line 9 as shown
 - Add Cmd/10-EDD Questionnaire to display the EDD Questionnaire screen (Page 7)



EDD Rating Configuration (“Scoring”)

Access: To be determined - see Page 17 - **need both update and inquiry versions**

Program: New

GOLD panel: New

The new configuration will allow each credit union to configure EDD levels and determine how a level is calculated and assigned to a member based on their interpretation of risk level.

Screen 1 - Scoring Calculation Parameters

*...+....1....+....2....+....3....+....4....+....5....+....6....+....7....+....8

1	4/03/08	<u>Enhanced Due Diligence Rating Configuration</u>		14:40:14
2				UXXXXX-02
3	<u>Demographic Item</u>	<u>Pts</u>	<u>e-Banking Item</u>	<u>Pts</u>
4	Credit union relationship		Direct deposit	.
5	1=None prior	.	Audio response	.
6	2= 0 months to 0 months	.	Online banking	.
7	3= 0 months to 0 months	.	Online bill payment	.
8	4= 0 months to 0 months	.	Wires - U.S.	.
9	Local within HIDTA	.	Wires - International	.
10	Local within HIFCA	.	Wire frequency - occasional	.
11	Non-local within HIDTA	.	Wire frequency - repetitive	.
12	Non-local within HIFCA	.		.
13	<u>Source of Wealth Item</u>	<u>Pts</u>	<u>Source of Wealth Item</u>	<u>Pts</u>
14	Wage earner	.	Principal of company	.
15	Normal business	.	Principal/s foreign citizens	.
16	Money store	.	Principal/s politically exposed	.
17	Cash intensive	.	Principal/s mbr in good standing	.
18	Purchase monetary instruments	.	Principal/s not existing member	.
19	Est. weekly deposits (whole \$)		Est. weekly withdrawals (whole \$)	
200 to0 to
21	1234567 to	1234567 to
22	1234567 to 9999999	.	1234567 to 9999999	.
23	Cmd/7-CANCEL	Enter-Continue		
24				

- Enter saves changes and continues to screen 2 (see Page 13); Cmd/7-CANCEL cancels changes and returns to menu.
- Point values can be 0-9 - would prefer to show blank instead of 0 if possible similar to the Tiered Service points config screen (UTSERV-03)

Field Descriptions

Field Name	Description, doc notes, etc.	Tied to field in database / EDD questionnaire (see Page 7):
Demographic		
Credit union relationship	4 “levels” in months, one for “none” (no prior relationship) - allow input only on the “high” levels and calculate the rest - no requirement to use all of the levels, either	Single <i>CU Relationship</i> field with 1, 2, 3, or 4
Location	HIDTA = High Intensity Drug Trafficking Area HIFCA = High Intensity Financial Crimes Area	Single <i>Location</i> field with 1 (local) or 2 (non-local) Separate fields for the HIDTA and HIFCA (can select both)
e-Banking		
Direct deposit		Single <i>Direct deposit</i> Y/N field
Audio response		Single <i>Audio response</i> Y/N field

<i>Field Name</i>	<i>Description, doc notes, etc.</i>	<i>Tied to field in database / EDD questionnaire (see Page 7):</i>
Online banking		Single <i>Online banking</i> Y/N field
Online bill payment		Single <i>Online bill pay</i> Y/N field
Wires - U.S.		Single <i>Wires US</i> Y/N field
Wires - International		Single <i>Wires International</i> Y/N field
Wire frequency - occasional		Single <i>Wire freq</i> field with 2 choices
Wire frequency - repetitive		
Source of Wealth		
Wage earner	For non-businesses - if they receive a wage from somebody else (they don't file a Schedule C with their income tax return)	Single <i>Source of wealth</i> field with 2 choices (this and Principal of company, below)
Normal business	This is for all other businesses that aren't money stores or labeled as cash-intensive	Single <i>Business type</i> field with 3 choices
Money store	Specifically for money stores	
Cash intensive	Specifically for businesses classified as cash intensive	
Purchase monetary instruments	Means they are planning to purchase things like money orders or cashier's checks	Single <i>Monetary instruments</i> Y/N field
Estimated weekly deposits	7 digits whole dollars 3 levels - notice which fields should allow input; calculate the rest - should not require all levels be used, though	Single <i>Weekly deposits</i> field
Principal of company	If they are the principal of a business (sole proprietorship, etc.) - they <u>do</u> file a Schedule C with their income tax return	Single <i>Source of wealth</i> field with 2 choices (this and Wage earner, above)
Principal/s foreign citizens	If one or more of the business principals are foreign citizens (includes joint owners)	Single <i>Foreign principals</i> Y/N field
Principal/s politically exposed	(Not sure what this means)	Single <i>Politically exposed principals</i> Y/N field
Principal/s mbr in good standing	If one or more of the business principals (includes joint owners) are already existing members with good history	Single <i>Principals CU relationship</i> field with 2 choices
Principal/s not existing member	If none of the business principals are currently members	
Estimated weekly withdrawals	7 digits whole dollars 3 levels - notice which fields should allow input; calculate the rest - should not require all levels be used, though	Single <i>Weekly withdrawals</i> field

Monitoring and Reporting

Changes to Inquiry/Phone/Teller

This will affect the generic “View of the Member” screen (or the Comments/Member ID pop-up in the new Teller system) to display the member’s rating for CU staff. Membership Designation procedures can be configured to include any needed steps based on the member’s rating.

- Because of the account comment, just need to display the level so they can see it has been assigned - the comment should be the warning about special procedures. They can use the Membership Designation procedures (click the books icon next to the screen title) for more instructions.

Access: Member Inquiry, Phone Operator, or the new Teller Comments/Member ID window
 Program: IMBRTB, IPHACT, ??
 GOLD panel: 4366, 4698 (not sure about the new Teller window - was 4056)

```
*...+...1...+...2...+...3...+...4...+...5...+...6...+...7...+...8
4/04/08 Search for Active Account Types 16:37:27
Name Individual COMMENTS Corp ID 01 IMBRTB-01
3709 **** ME SILVER TIER DEFAULT HOLD * NO CLUBS
JOHN MEMBER 456-32-1987 Open 101404 HH 394 Misc 0 0
MMN Deny N
Secondary Names Code Word Rsn 01 Br 01 Acct Exec
111 TESTSTREET Born 11011980 Died
TESTCITY, MI 49999 OTB Spons X-Sales
H 6165551111 W 6161324568 0 F RDI No Label
Email I A A P F T A O B J
Ln PayOff/ Ln Paymnt/ Next Pymt/ R T F / R R C D O /
```

- Need to add a field somewhere - label of *EDD level* and the 4-byte display code (LOW, HIGH, etc.)
- GOLD - suggest putting it on the Other Details tab



I don't know where to put this since this screen is very full, and there is now a separate version of this for teller. **Programmer: see Dawn with ideas if you can find some spare space!**

New Monitoring Report (Based on the Insider/Employee Audit Report)

We will be creating a new on-demand report that is a variation of the existing Insider/Employee Audit Rpt except that instead of pulling only accounts that have an insider/employee type code, it will pull accounts that have an EDD level on them.

NOTE: I tried to figure out a way to combine these into a single set of reports, but the sorting got very confusing. The existing report only pulls accounts that have a employee type code on them, so if we try to expand it to also do all members with an EDD level, it overlaps and gets very confusing. So the selection screen will require they choose either insiders or EDD members, not both.

Access: MNGELE #26 Print Insider/Employee Audit Rpt - see Page 17 for changes
 Program: LAUDIT
 GOLD panel: 5048

```

*...+...1...+...2...+...3...+...4...+...5...+...6...+...7...+...8

4/07/08          Print Special Account Audit Report          15:21:46
                  Lxxxxx-01

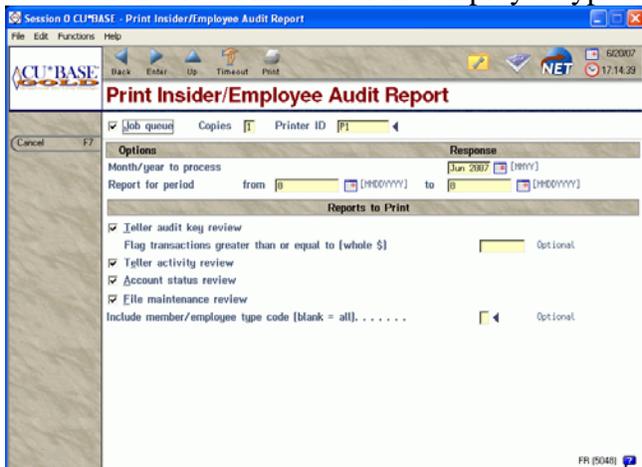
JOBQ  Y  (Y/N)          Optional-*
Copies 1  (1-9)
Printer P1          ?          Options          Response

Month/Year to Process. . . . . 408
Report for period. . . . . from 0 to 0
Reports to print (Y/N):
1 - Teller Audit Key Review. . . . . Y
   Flag transactions greater than or equal to (whole $) . . . . . 0 *
2 - Transaction Activity Review. . . . . Y
3 - Account Status Review. . . . . Y
4 - File Maintenance Review. . . . . Y
Data type: 1=Insiders/Employees, 2=Members with EDD Levels . . . . . 1
If 1, include Member/Employee Type Code (blank=all). . . . . ? *
If 2, include Enhanced Due Diligence Level . . . . . - *
   (1=Low, 2=Medium, 3=High, 4=Extreme, blank=all)

Cmd/7-CANCEL
  
```

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

- Remove blank lines between the selection criteria to make more room
- Different title as shown
- Add new *Data type* option as shown - default to 1 but require entry
- Add the *If 2, include Enhanced Due Diligence Level* option (can be used only if data type=2) - if blank, will include all accounts that have a level recorded (do NOT include any accounts with no level at all)
- Make the report titles conditional and include the EDD level on all four reports as shown on the next page - replace the line at the top with the Member/Employee Type; sort/group/page breaks should be based on that level instead of the employee type code



Transaction Activity

*...+...1...+...2...+...3...+...4...+...5...+...6...+...7...+...8...+...9...+...0...+...1...+...2...+...3..

04/07/08 14:14:55		XCU*ANSWERS TEST CREDIT UNION (CU)				LTRNACT	PAGE	
		Enhanced Due Diligence Audit Report - TRANSACTION ACTIVITY REVIEW					USER	DAWNM
		For the Period 2/01/2008 to 3/31/2008						
		Enhanced Due Diligence Level: 1 LOW RISK BLAH BLAH						
Account	Origin Code	Transaction Code	Total # Trans	Total Trans Amount	Average Trans Amount			
2288	01 Teller Posting	32 SHARE DRAFT DEPOSITS	11	.00	.00			
	*Subtotal Origin Code 01		11	.00	.00 *			
07	Journal Transfers	12 SHARE DEPOSITS	4	112.00	28.00			
		13 SHARE WITHDRAWALS	11	15.10	1.37			
		32 SHARE DRAFT DEPOSITS	6	5.10	.85			
		33 SHARE DRAFT WITHDRAWALS	5	114.00	22.80			
	*Subtotal Origin Code 07		26	246.20	9.46 *			

File Maintenance

*...+...1...+...2...+...3...+...4...+...5...+...6...+...7...+...8...+...9...+...0...+...1...+...2...+...3..

04/07/08 14:14:54		XCU*ANSWERS TEST CREDIT UNION (CU)				LCUFACT	PAGE	
		Enhanced Due Diligence Audit Report - FILE MAINTENANCE REVEIW					USER	DAWNM
		For the Period 2/01/2008 to 3/31/2008						
		Enhanced Due Diligence Level: ALL						
Date	Account	Typ	ID	Prog	File	Field	Change Made - Before	Change Made - After
2/21/08	2288	001	89	PUTNMT	TRANS	TRDESC		STOP PAY CHANGED
2/21/08		001	89	PUTNMT	TRDESC	TRDSC1		CHECK# 123 8/02/22 TEST \$.0
2/21/08		001	89	PUTNMT	TRANS	TRDESC		STOP PAY PLACED

Account Status

*...+...1...+...2...+...3...+...4...+...5...+...6...+...7...+...8...+...9...+...0...+...1...+...2...+...3..

04/07/08 14:14:55		XCU*ANSWERS TEST CREDIT UNION (CU)				LACCACT	PAGE		
		Enhanced Due Diligence Audit Report - ACCOUNT STATUS REVIEW					USER	DAWNM	
		For the Period 2/01/2008 to 3/31/2008							
		Enhanced Due Diligence Level: 3 HIGH RISK--MONITOR BLAH							
Account	Typ	Account Description	Date Opened	Current Balance	New Negative	New CD Acct Deposit	Delinquent Balance	Secured Loan	Date of Last Credit Report
2288	000	SHARES	07/19/95	1,932.81					0/00/0000
		Total Deposits/Payments		117.00					
		Total Withdrawals/Disbursals		88.30					
		*Net Activity for Period		28.70 *					
	001	CHECKING	07/19/95	717.00					0/00/0000
		Total Deposits/Payments		1,009.10					
		Total Withdrawals/Disbursals		292.10					
		*Net Activity for Period		717.00 *					

Teller Activity

*...+...1...+...2...+...3...+...4...+...5...+...6...+...7...+...8...+...9...+...0...+...1...+...2...+...3..

04/07/08 15:04:46		ABC TEST CREDIT UNIONXXXXXXXXXX				LTELLAUD	PAGE	
		Enhanced Due Diligence Audit Report - TELLER AUDIT KEY REVEIW					USER	DAWNM
		For the Period 4/01/2008 to 4/07/2008						
		Enhanced Due Diligence Level: 3 HIGH RISK--MONITOR BLAH						
Account	Audit Key	Total # Trans	Total Trans Amount	Average Trans Amount	Days With Activity	Days Without Activity		
2424	B Cash back	1	9.50	9.50	1	6		
	2 Deposit/Payment	1	50.00	50.00	1	6		
	6 Outside Check	3	59.50	19.83	2	5		
4240	B Cash back	3	55.00	18.33	2	5		
	0 Funds Forwarded	2	2.38	1.19	2	5		
	2 Deposit/Payment	5	687.36	137.47	3	4		
	6 Outside Check	2	733.50	366.75	1	6		
	8 Withdrawal/disb.	4	5.98	1.49	2	5		
	9 Cash In	1	.50	.50	1	6		

Menu Changes

Note to Programmer: Menu changes are done by Dawn/Jack with the release. Can add new programs to MNNEW for testing purposes.

- Add the new report to MNAUDT (coming in the Spring release) - use the slot for the existing insider report and change verbiage
- Add the inquiry-only version of the new config to MNAUDT
- Add the update version of the new config to ?? - there isn't room on MNCNFC so we might need to bite the bullet and do a new 3rd general configuration menu!