

The Independent Compliance Audit

An independent audit is a required part of every agent’s written anti-money laundering policies and procedures. This audit is an examination of your compliance program and will ensure that your program is meeting all federal and state regulations. It should be conducted once per year. The audit can be completed by any member of your organization EXCEPT the Compliance Officer and is necessary for every business required to have an anti-money laundering program.

Requirements for a Compliance Auditor

The person who conducts the independent audit of the anti-money laundering program should be well-informed about the anti-money laundering regulations which apply to the business and its sale of money orders.

The Auditor CANNOT be the Compliance Officer for the business.

The audit can be performed internally by any qualified member of the staff (e.g., manager, supervisor) or externally by any qualified person (e.g., Accountant for the business, MEMO Compliance Auditor).

Components of An Independent Audit

- ❖ Questions to be answered about all four (4) parts of the compliance program: Policies & Procedures, Compliance Officer, AML Training (both new & existing staff), and Internal Audits.
- ❖ Verification of supporting documents (e.g., Money Order Transaction Reports for any sales of \$3,000 - \$10,000, Employee AML Training Forms for documentation of compliance training).
- ❖ Description of corrective action, if needed.
- ❖ A completed and signed review form, to be kept for five (5) years.

IMPORTANT:

Two forms designed to meet the independent review requirement are available for MEMO Agents. The two forms are the abbreviated Independent Review form, and the more detailed AML Self Examination Form. These are available in section two (2) of the MEMO Agent Anti-Money Laundering Manual or online at: www.memoco.com/agent_compliance.html, under the title “Downloads”.

Print, sign, and keep this document as proof that you received continuous training on anti-money laundering laws and regulations. Make additional copies for employees as proof that you trained employees on anti-money laundering laws and regulations. Keep all signed copies for 5 years.

Name/Signature

Agent Number

Date