

- Politically Exposed Person
 - High Risk Country
- Loan file to be checked for applicable functional aspects from Quarterly NCA File Assessment Form for both borrowers and co-borrowers.
 - Borrower(s) Name(s)
 - Approval and Funding Dates
 - Physical Address
 - Social Security Number
 - Date of Birth
 - Folders to be reviewed for PCR checks from a qualitative perspective
 - Is PCR alerted?
 - Did the Loan Investigation Department (LID) review the PCR hit?
 - Did LID escalate the true-positive alert to AML Compliance?

2.2 Quarterly NCA File Assessment Report

- Enter findings from Quarterly NCA File Assessment form onto the MIT Quarterly Summary Review Excel Spread sheet
 - X in the named field if applicable, present and correct
 - N/A in the named field if not applicable to that File
 - X In the name field if applicable, missing or incorrect
 - Add to comments field to explain issue
- Upon Completion of MIT Quarterly Summary Review Excel spread sheet
 - Tally all of the X and X in the data elements
 - Tally all of the X in the data elements
 - Calculate the percentage of X in the total data elements
 - Send E-mail to GM AML management and MIT compliance with findings and request for MIT to provide, where possible, corrections for designated errors



MIT File
Assessment.xls

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