



# Which BSA Software Solution Is Right For Your Institution?

**BSA Software Survey Detailed Results**

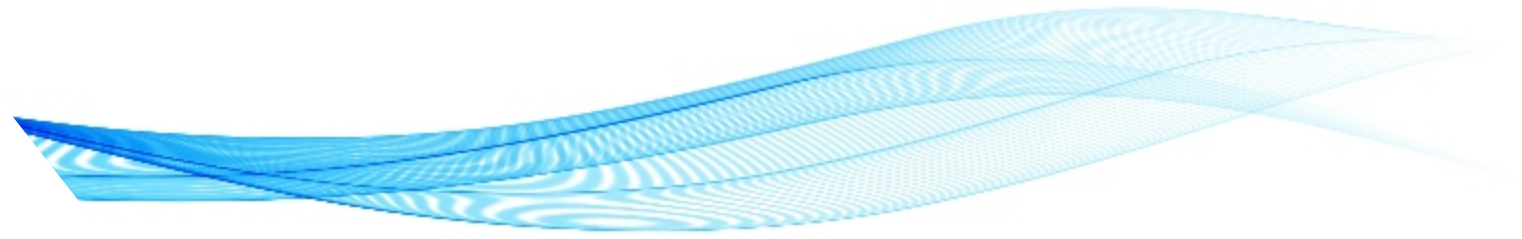


**Conducted 2Q 2016**



## Table of Contents:

Purpose of the Survey.....	Page 3
Purpose of this Report.....	Page 3
<b>Retail Banks:</b>	
Demographic Questions.....	Page 4
General BSA Software Survey Questions.....	Page 8
BSA Software Technical Questions.....	Page 12
BSA Software Pre-Implementation Questions.....	Page 15
BSA Software Implementation Questions.....	Page 16
BSA Software Post-Implementation Questions.....	Page 21
BSA Software Features Questions.....	Page 23
<b>Commercial Banks:</b>	
Demographic Questions.....	Page 28
General BSA Software Survey Questions.....	Page 30
BSA Software Technical Questions.....	Page 34
BSA Software Pre-Implementation Questions.....	Page 37
BSA Software Implementation Questions.....	Page 38
BSA Software Post-Implementation Questions.....	Page 43
BSA Software Features Questions.....	Page 45
Conclusion.....	Page 48
Comparisons.....	Page 50



## Purpose of the Survey:

A piece of a financial institution's (FI's) compliance program is the software they're using to monitor transactions for Bank Secrecy Act (BSA) compliance. Since BSA Compliance can take up so much of an FI's time, money and resources, we wanted to get an idea of what commonalities and differences might exist among FI's regarding their BSA/transaction monitoring software, and why.

In this survey, we asked questions like if they're using BSA/transaction monitoring software at all; if not, how are they managing their risk around this compliance topic; if they are, what features does it offer; how much does it cost annually; how satisfied they are with their software; is it hosted or licensed; how customizable is it; what pre-implementation, implementation, and post-implementation tasks they completed; what common rules/scenarios they use; and more.

## Purpose of this Report:

The purpose of this report is to summarize and demonstrate the detailed findings of this survey for retail and commercial bank respondents. A summarized version of this report discussing how banks are addressing this issue in their institutions is also available. To receive a copy, please send us an [email](#) requesting a copy of the survey results.

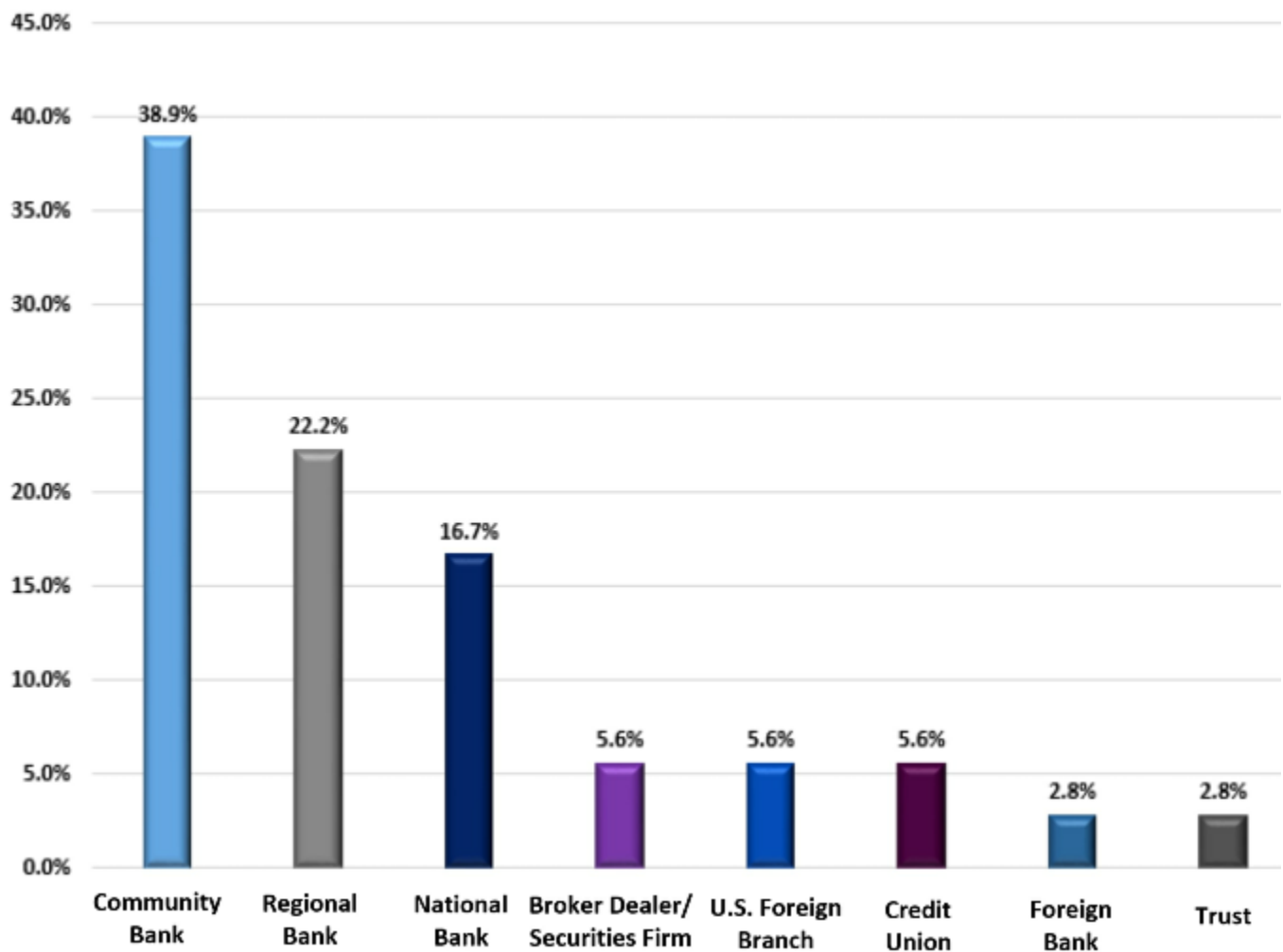




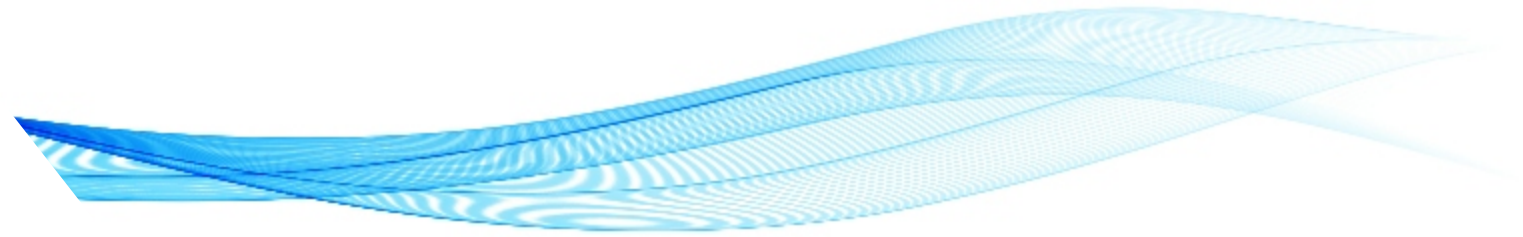
## Retail Banks: Demographic Questions

### *Institution Type:*

The majority of retail banks represented community banks at 38.9%; meanwhile, the two next largest groups represented were regional banks and national banks (22.2% and 16.7% respectively).

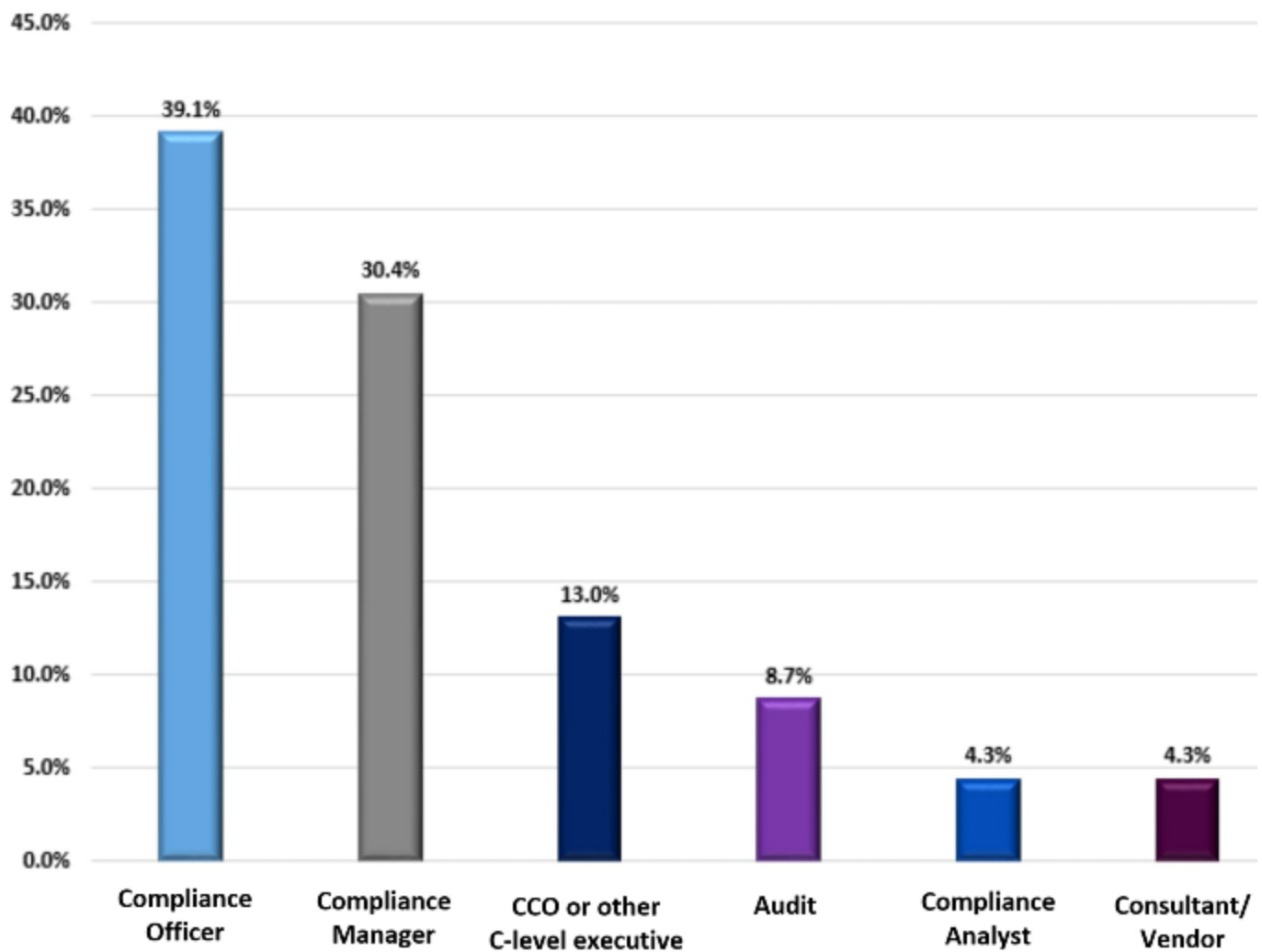






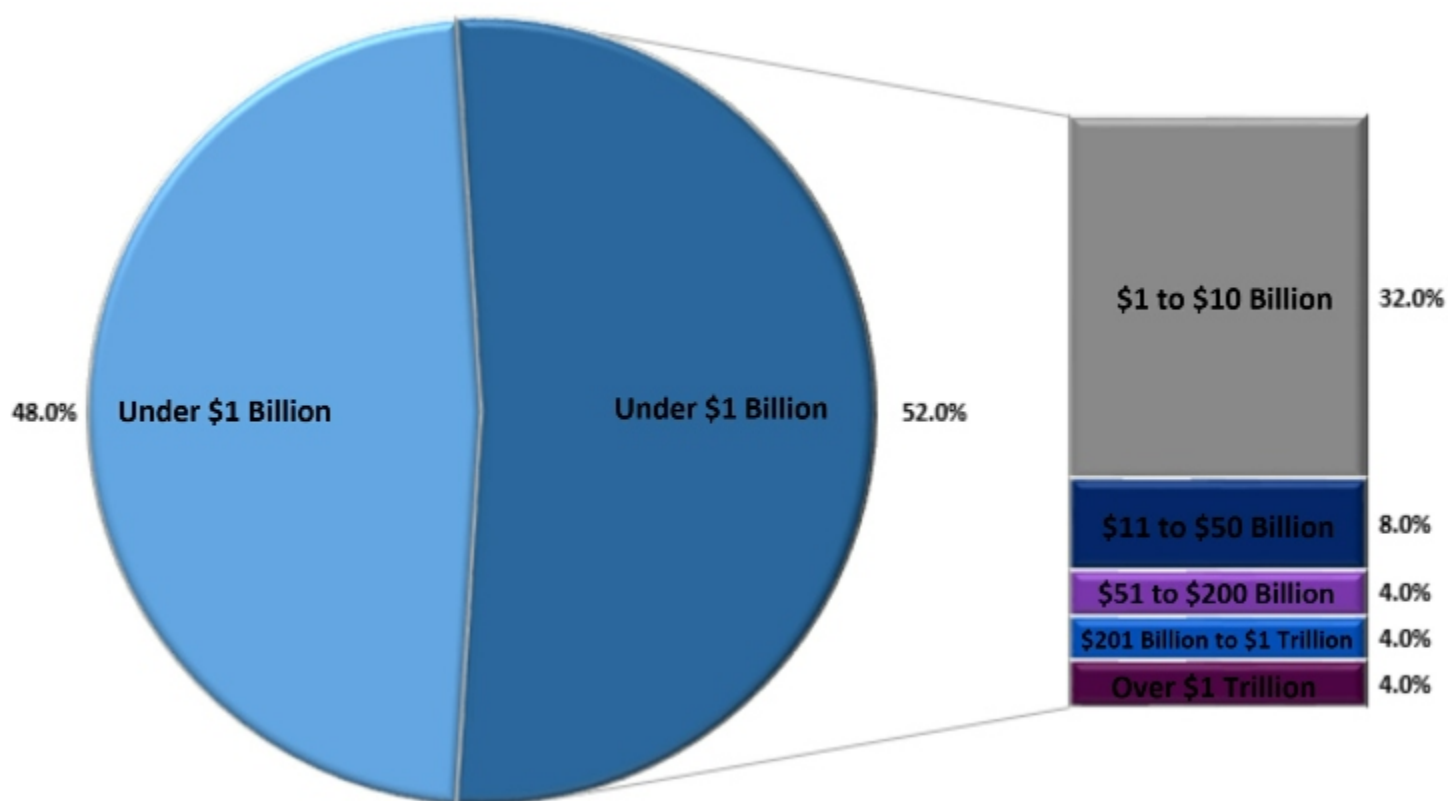
### *Current Position:*

As expected, the majority of retail bank respondents were compliance officers (39.1%) followed by a compliance manager (30.4%).



## Asset Size:

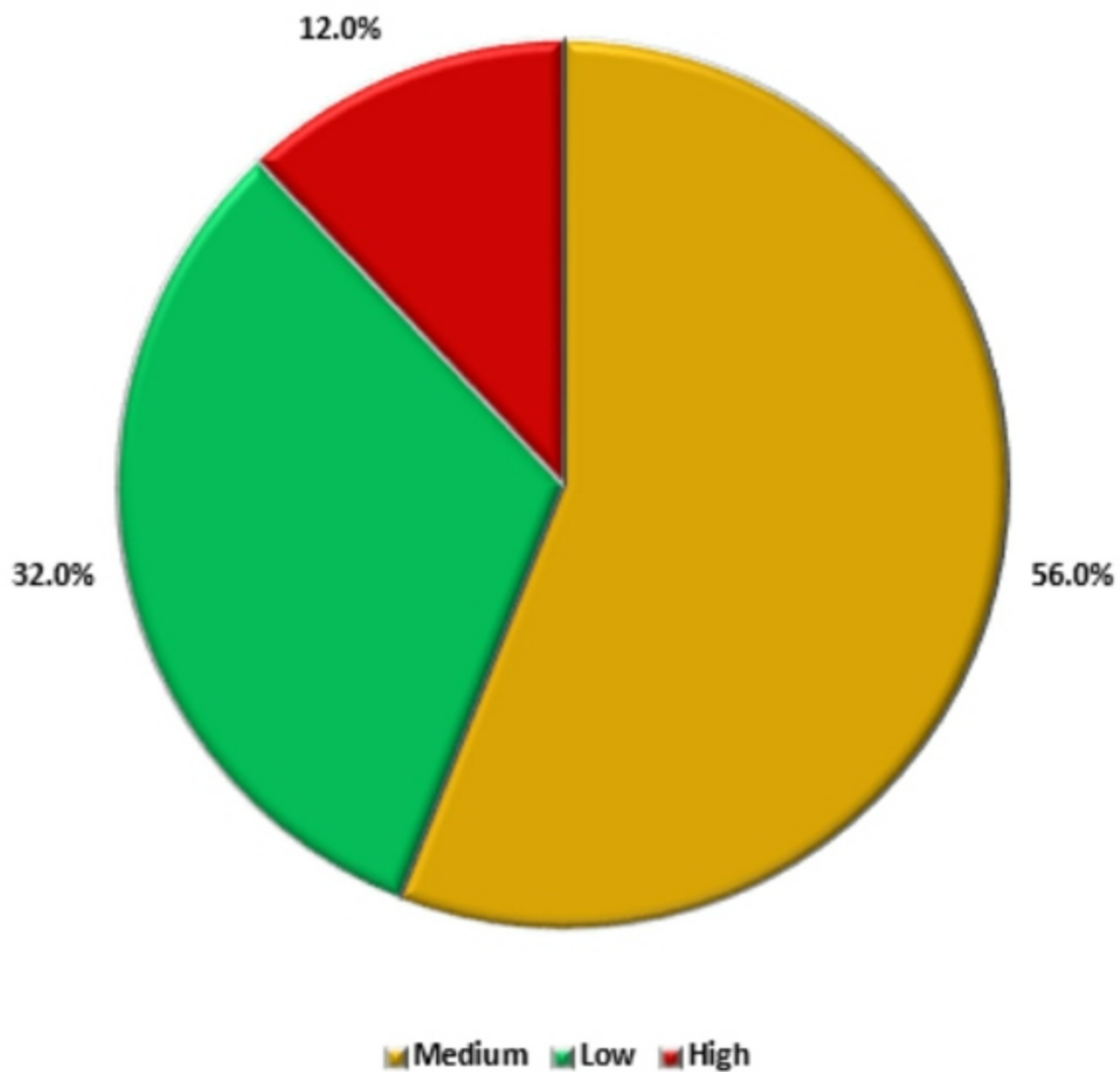
Of retail banks, there was nearly a 50/50 split of the retail banks representing under \$1 billion and over \$1 billion in asset size; however, for those over \$1 billion in asset size, the majority represented banks with \$1 to \$10 billion in assets (32%).





### *Risk Rating:*

As expected, the majority (56%) of our retail bank respondents stated that their institution had a medium risk rating and 32% had a low risk rating.

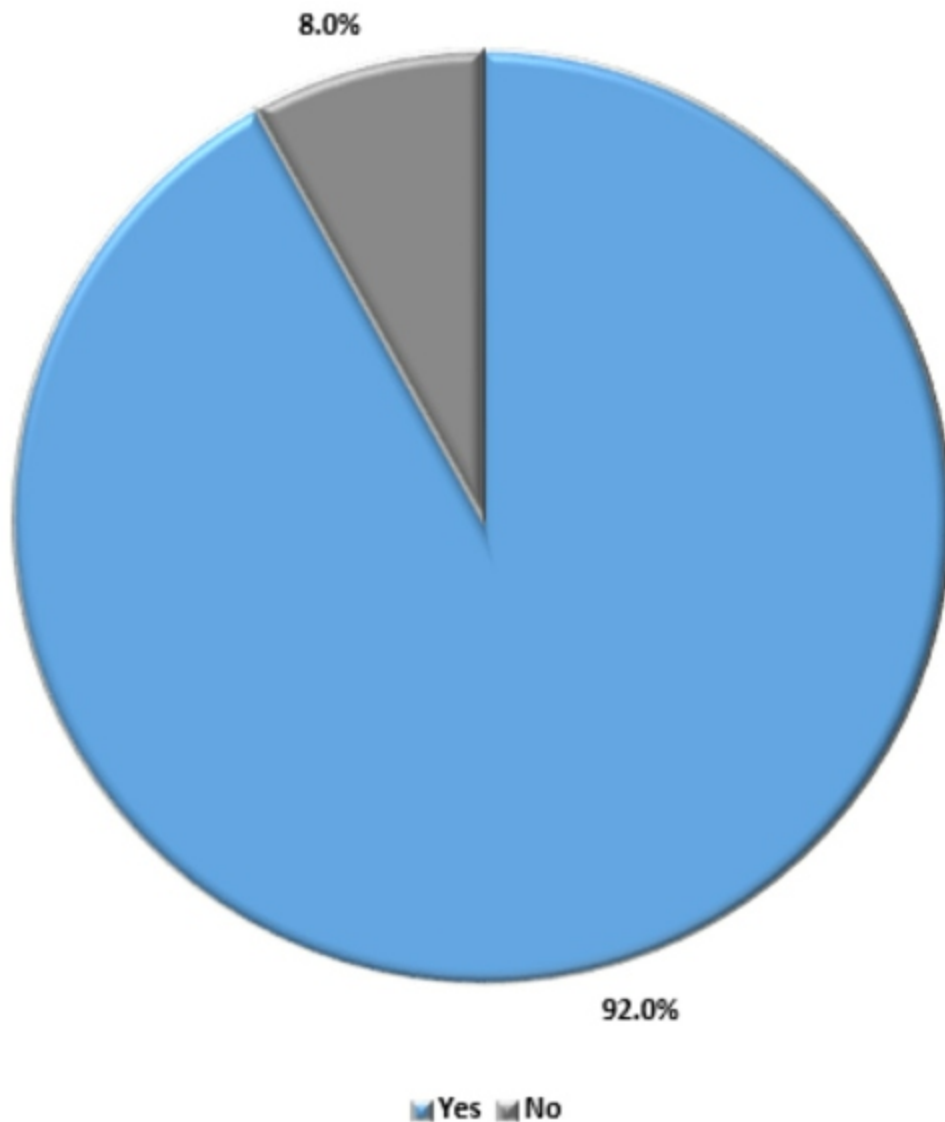




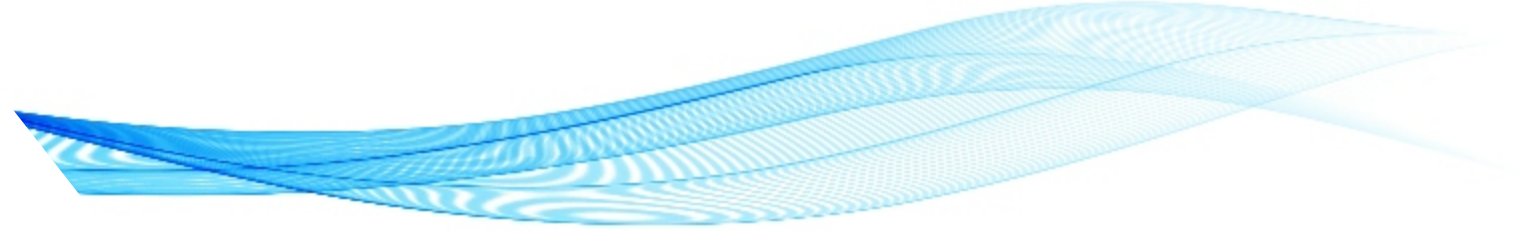
## Retail Banks: General BSA Software Questions

### *Transaction Monitoring Software Utilization:*

An overwhelming majority (92%) of retail banks say they utilize BSA/transaction monitoring software to monitor their customers's transactions.

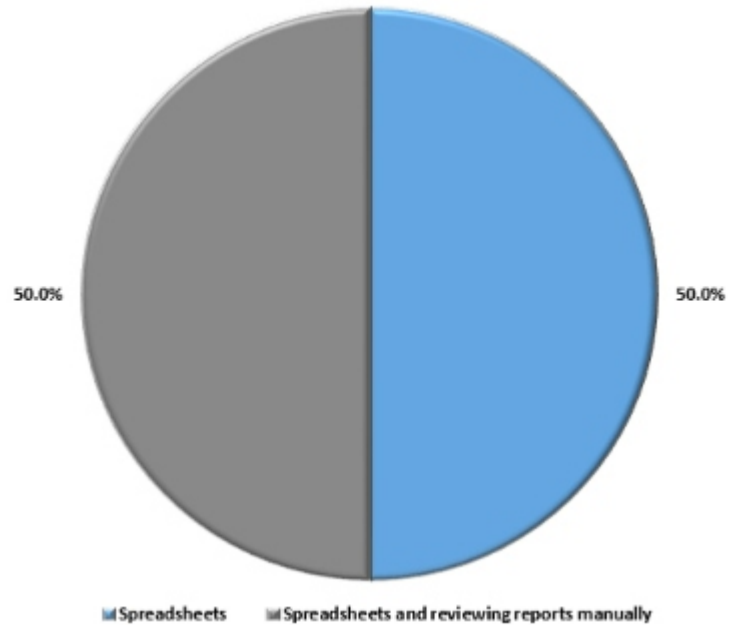






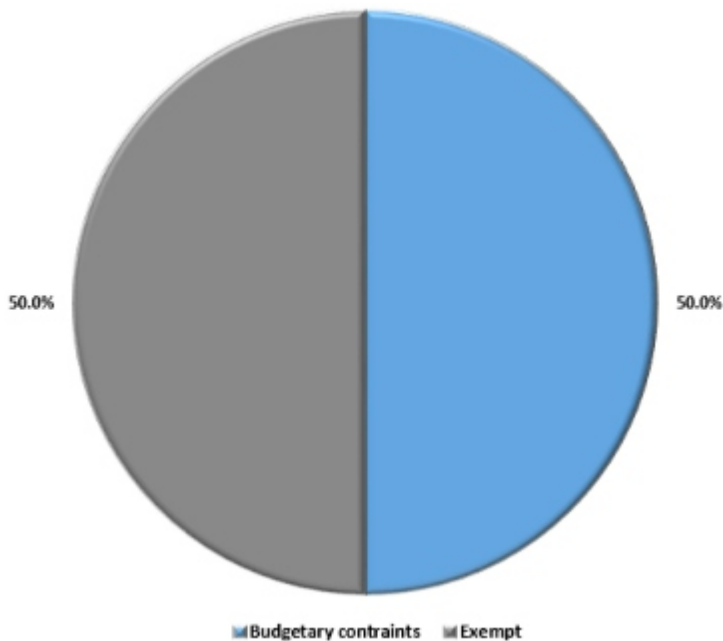
## Software Alternatives:

When we asked the 8% of retail bank respondents how they were monitoring transactions without BSA/transaction monitoring software, they were split 50/50 between using 'spreadsheets' and 'spreadsheets and reviewing reports manually'. None of the respondents were only reviewing reports manually.



## Reasons they're not using Transaction Monitoring Software:

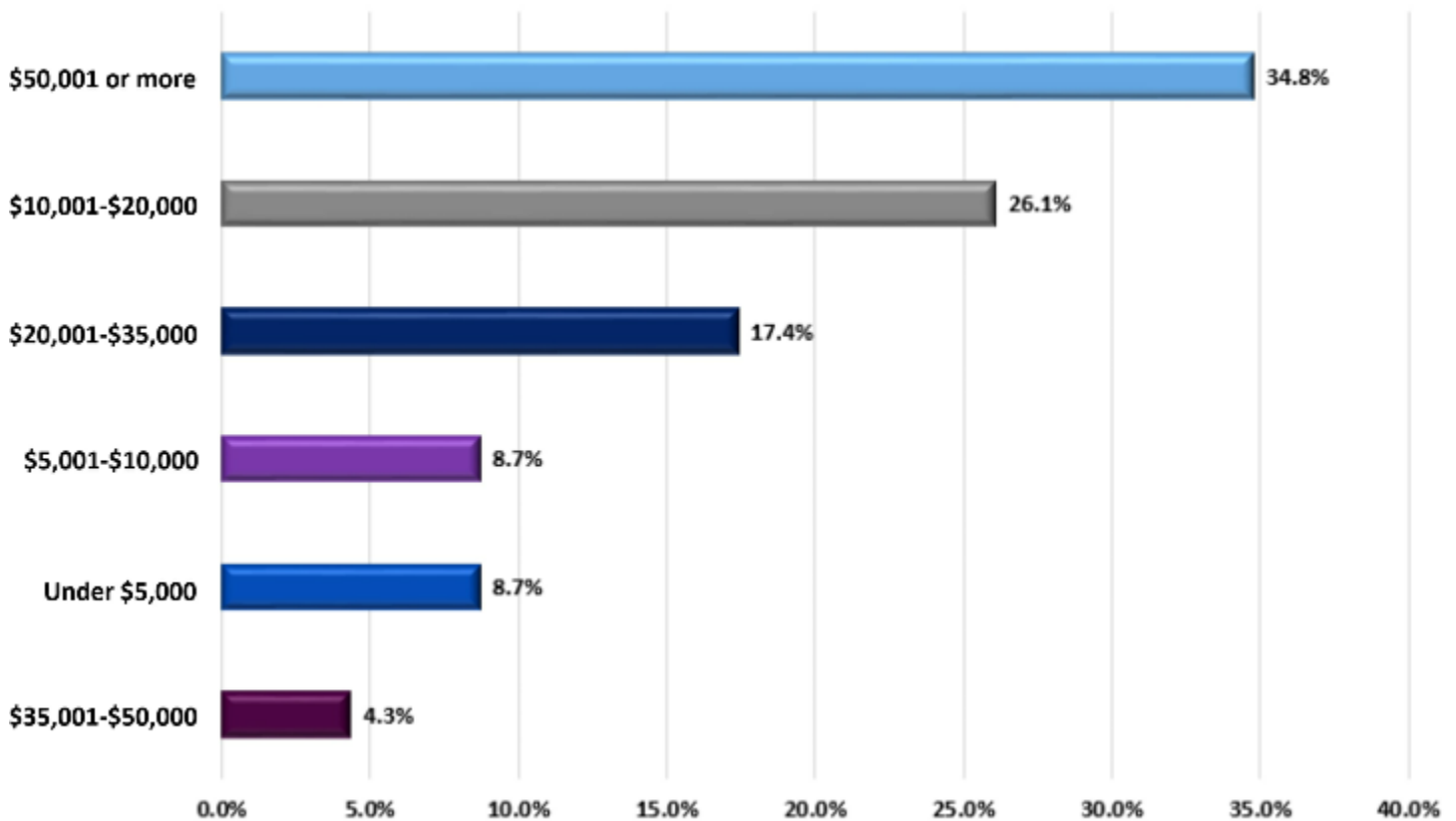
Again, there was a 50/50 split among respondents when we asked why they weren't using BSA/transaction monitoring software between 'budgetary constraints' and 'exempt', Exempt might mean that their institution doesn't have enough transactions warranting a software solution.

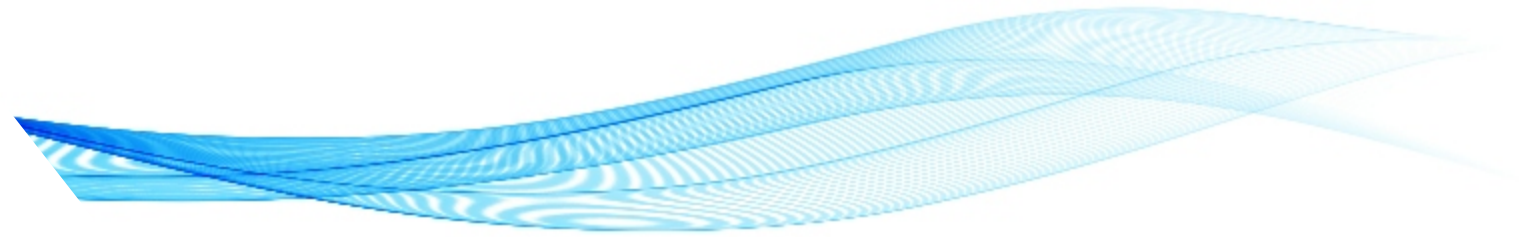




## Software Costs:

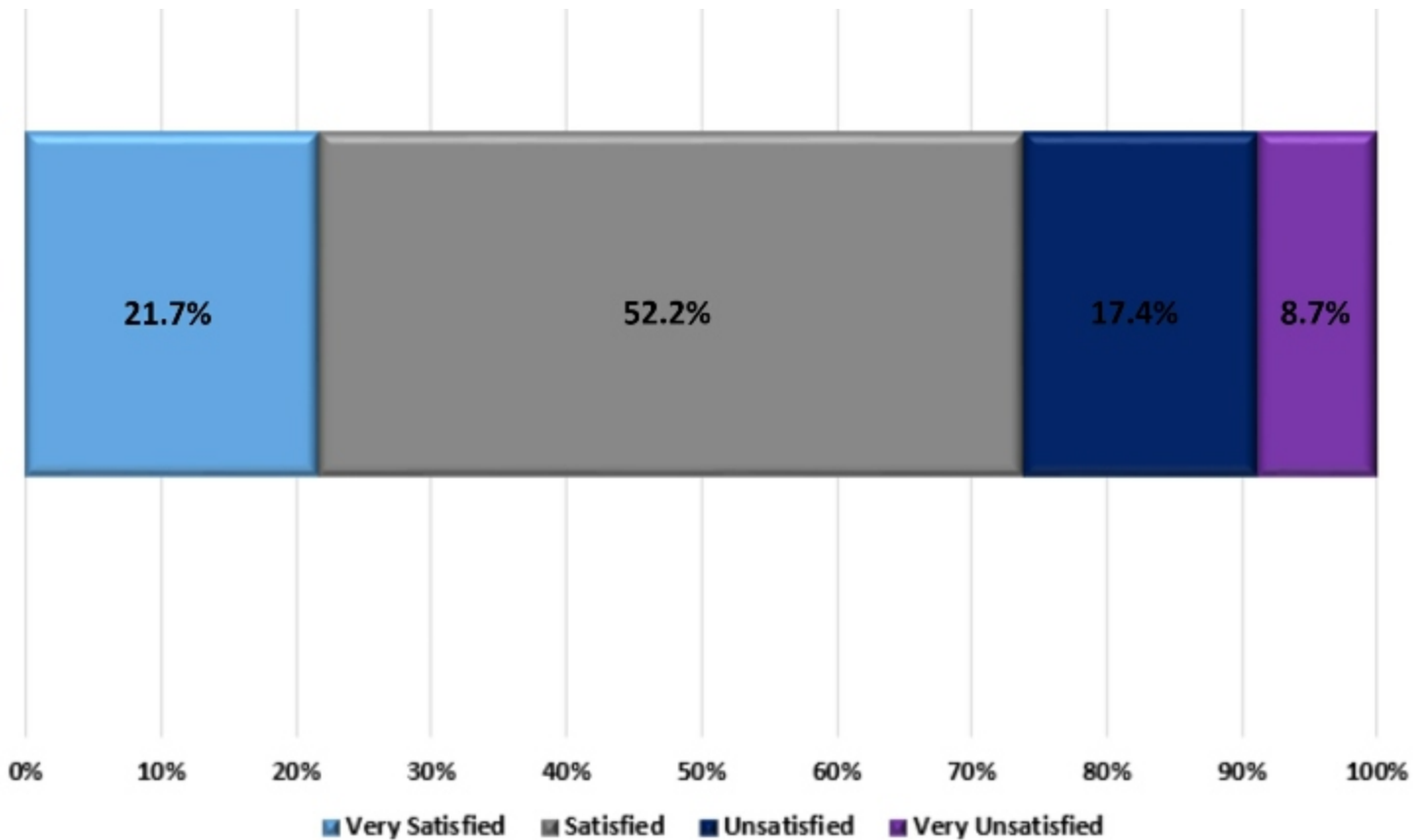
Of the retail banks that participated in our survey the majority of them are spending more than \$50,000 annually on their BSA/transaction monitoring software (34.8%). Nearly 40% of respondents spend more than \$35,000 and just over 40% spend between \$10,000 and \$35,000 on their BSA/transaction monitoring software.





### Software Satisfaction:

Just over half (52.2%) of our respondents say that they're satisfied with their BSA/transaction monitoring software, and just under a quarter (21.7%) are very satisfied. It was interesting to note that a combined 73.9% of retail banks are satisfied or very satisfied with their software. Meanwhile, a combined 26.1% are unsatisfied or very unsatisfied, slightly higher for retail banks than our general results.

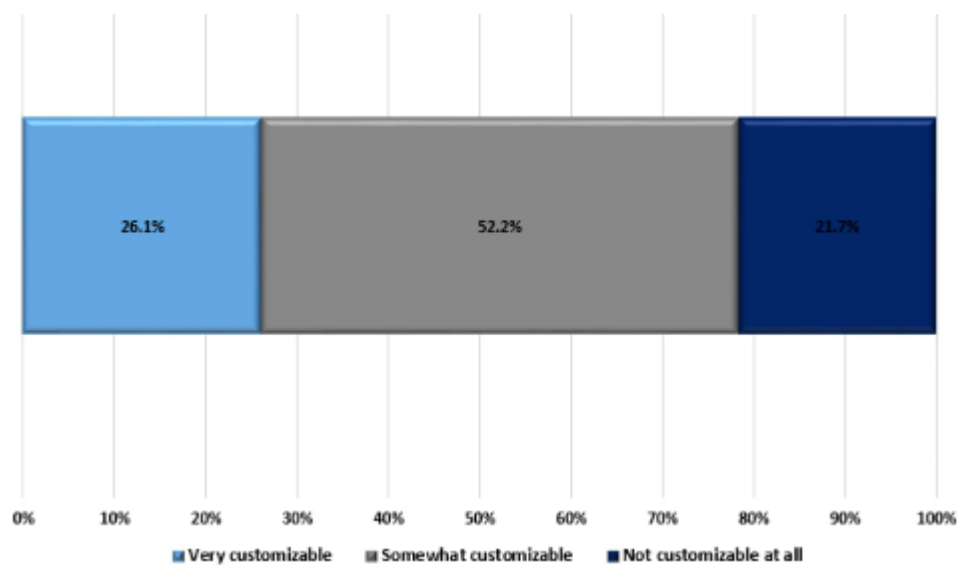
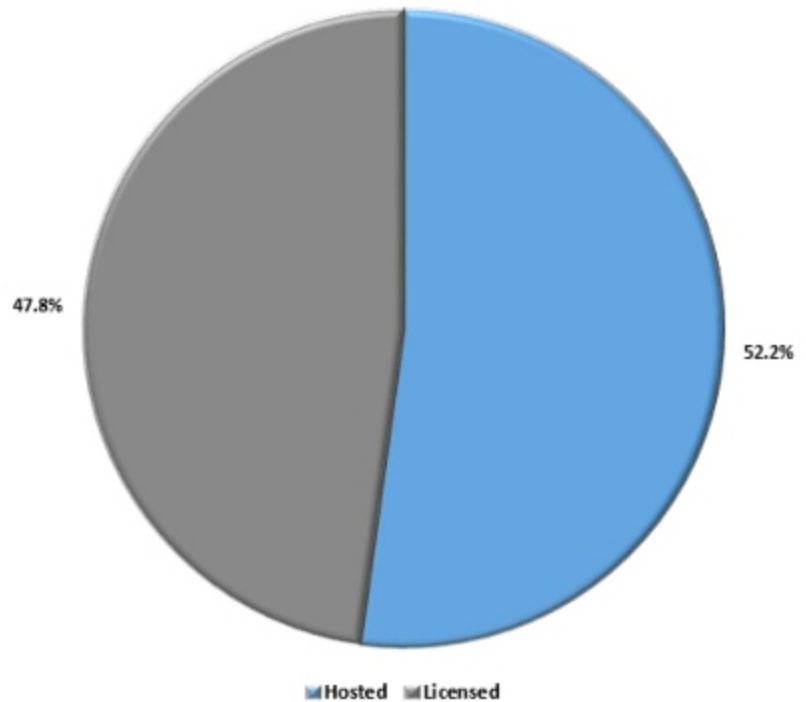




## Retail Banks: BSA Software Technical Questions

### *Hosted or Licensed:*

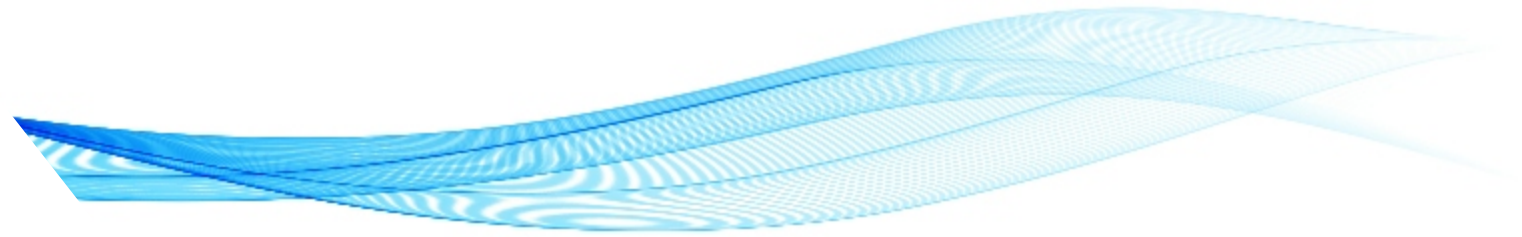
Just over 50% of our retail bank respondents are hosting their BSA/transaction monitoring software (52.2%).



### *Software Customization:*

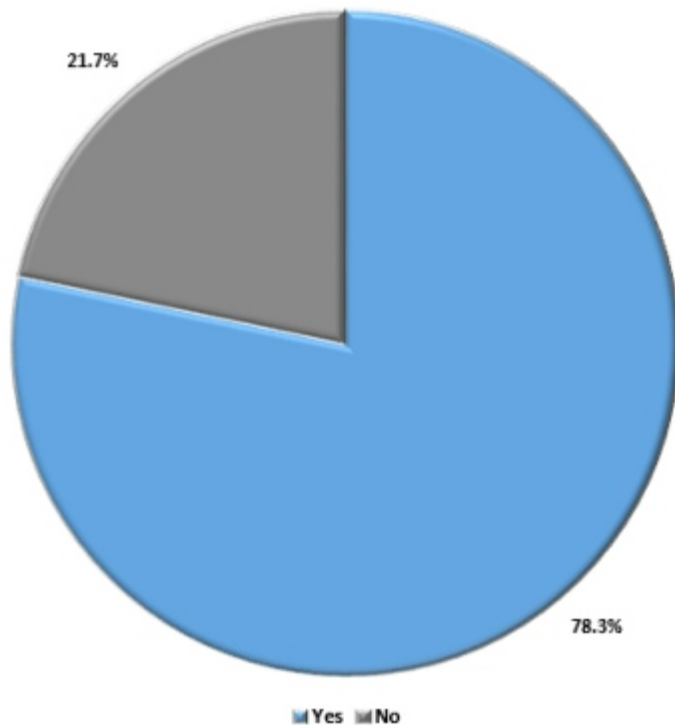
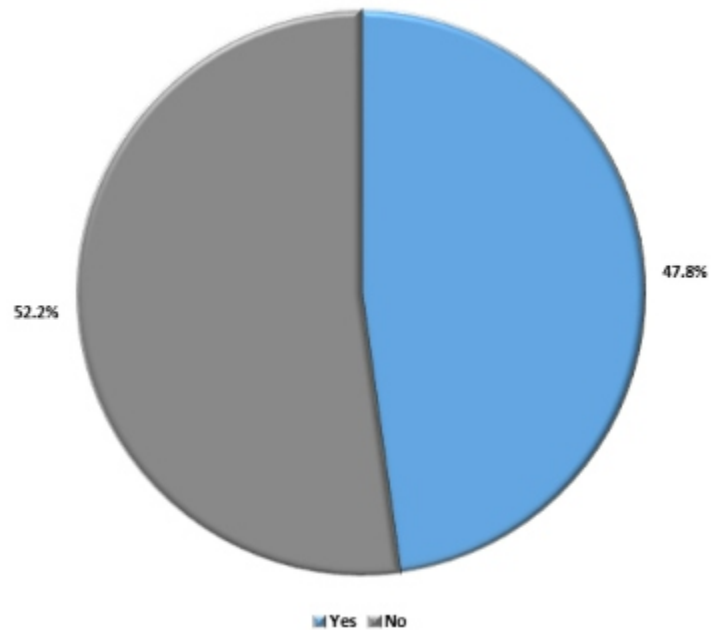
While the answers were varied, the majority of our retail bank respondents find their BSA/transaction monitoring software to be 'somewhat customizable' (52.2%). Only 21.7% weren't able to customize their software.





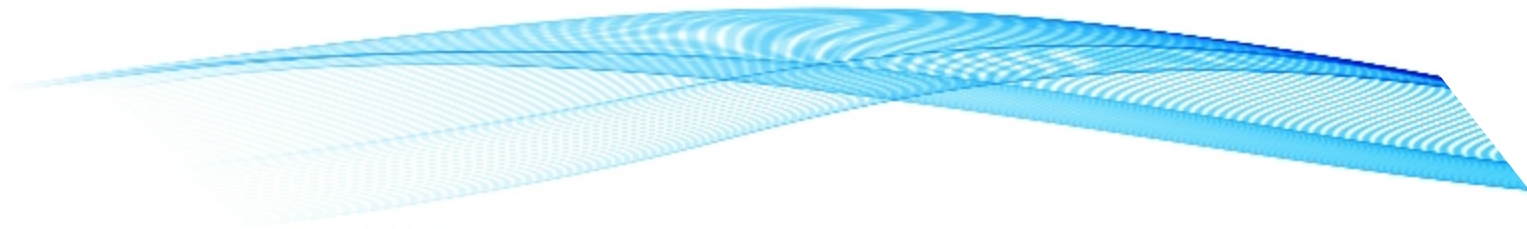
### *Test Server Access:*

52.2% of respondents do not have access to a test server, which would provide a complete and current replica of production for testing. It's interesting to note that this is the same percentage of respondents that host their software, as opposed to licensing it.



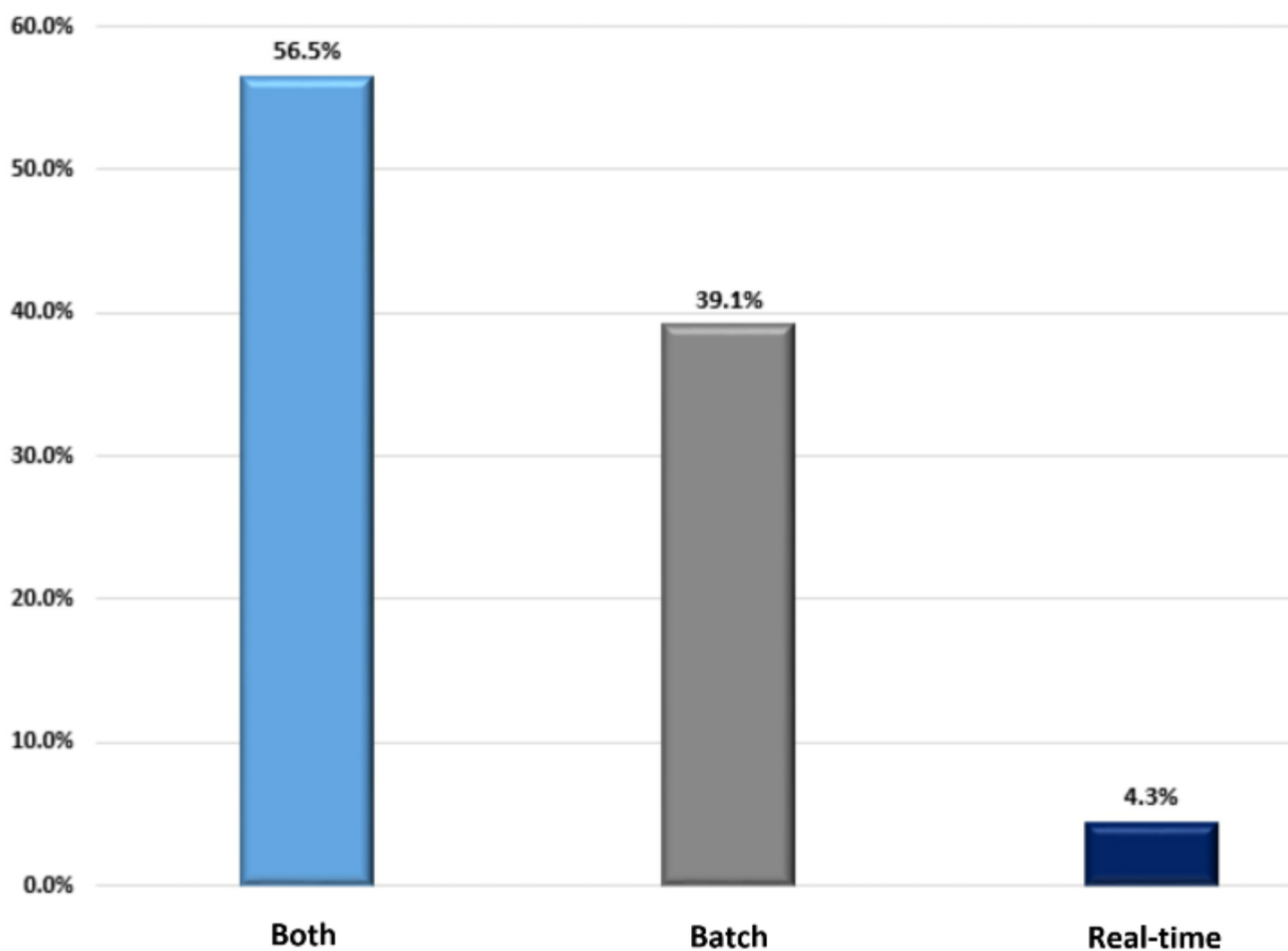
### *Profiling:*

Not far from the general survey results, 78.3% of retail bank respondents said that their BSA/transaction monitoring software uses profiling, as defined by comparing previous behavior to current behavior and alerting you of abnormal activity.



### *Real-Time, Batch, or Both?:*

The majority of retail bank respondents said that their BSA/transaction monitoring software uses both real-time and batch processing (56.5%). Only a very small amount (4.3%) solely uses real-time processing.

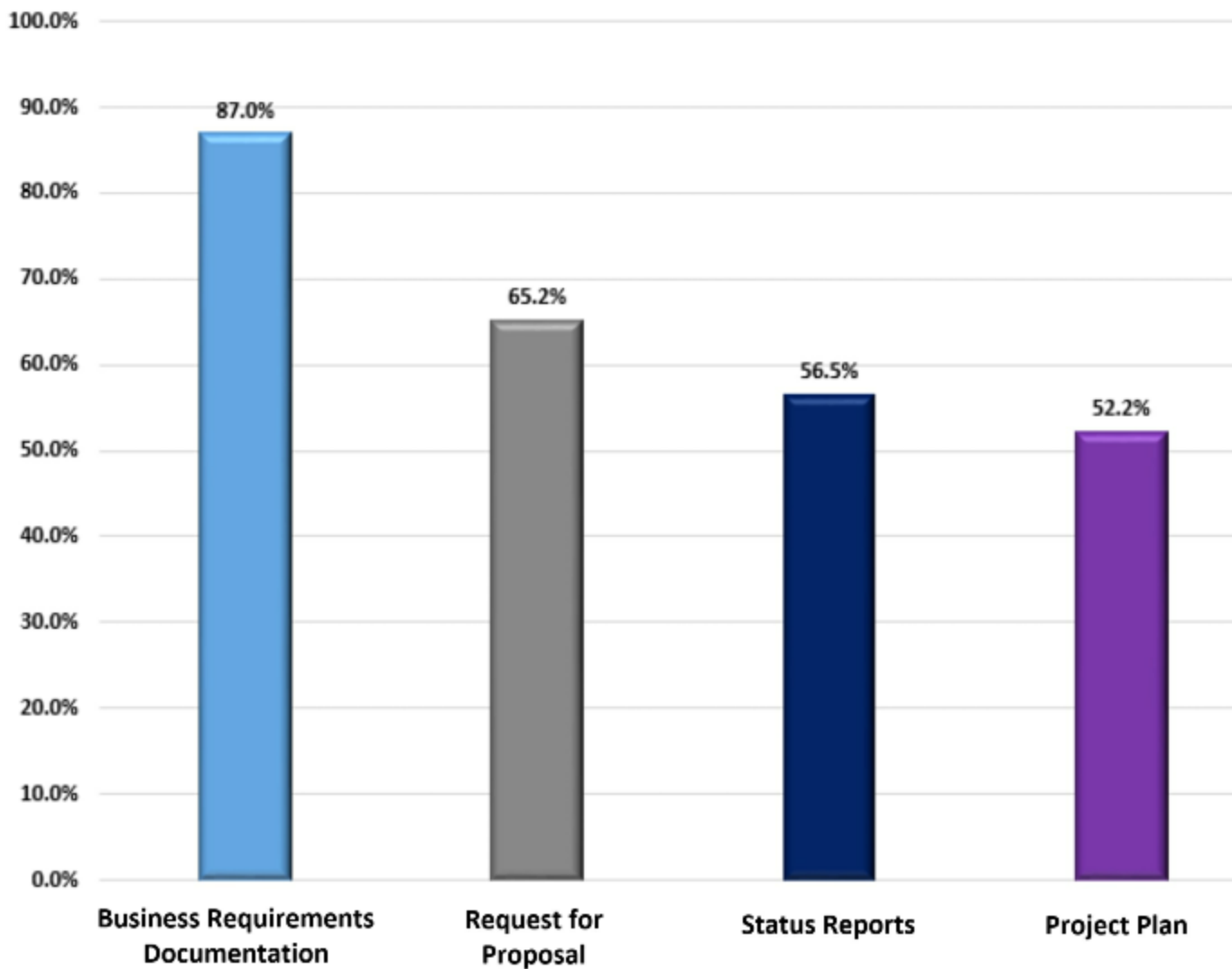




## Retail Banks: BSA Software Pre-Implementation Questions

### *Pre-Implementation Tasks:*

The majority of retail banks (87%) put together a business requirement document, while over half have done at least one of the following; submitted a request for proposal, executed status reports, and/or a project plan as part of a pre-implementation plan.

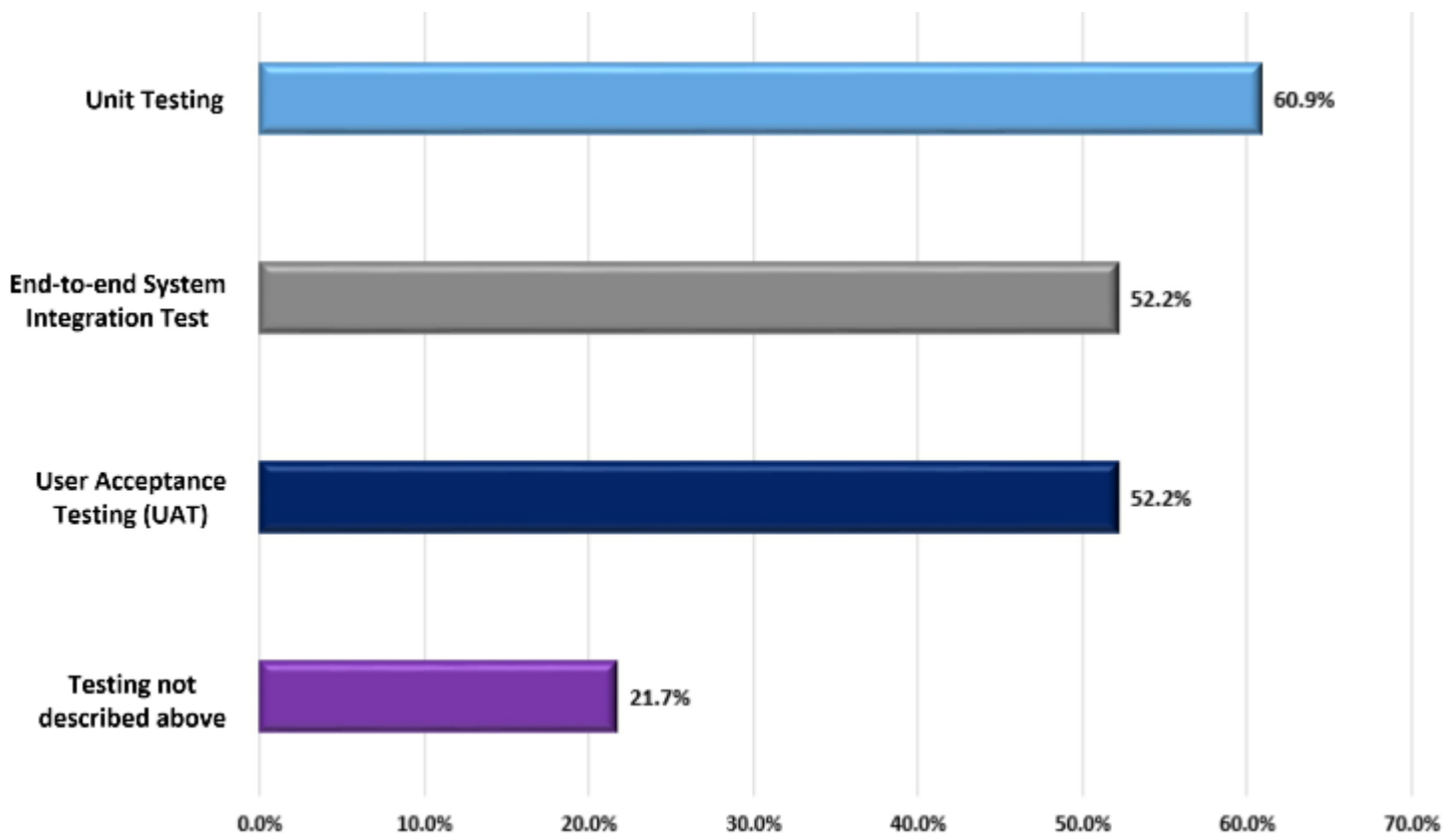




## Retail Banks: BSA Software Implementation Questions

### *Implementation Tests:*

The majority of retail banks represented conducted unit testing, end-to-end system integration testing and user acceptance testing (UAT). Only a small percentage conducted some other type of testing before finalizing the implementation of their BSA/transaction monitoring software.

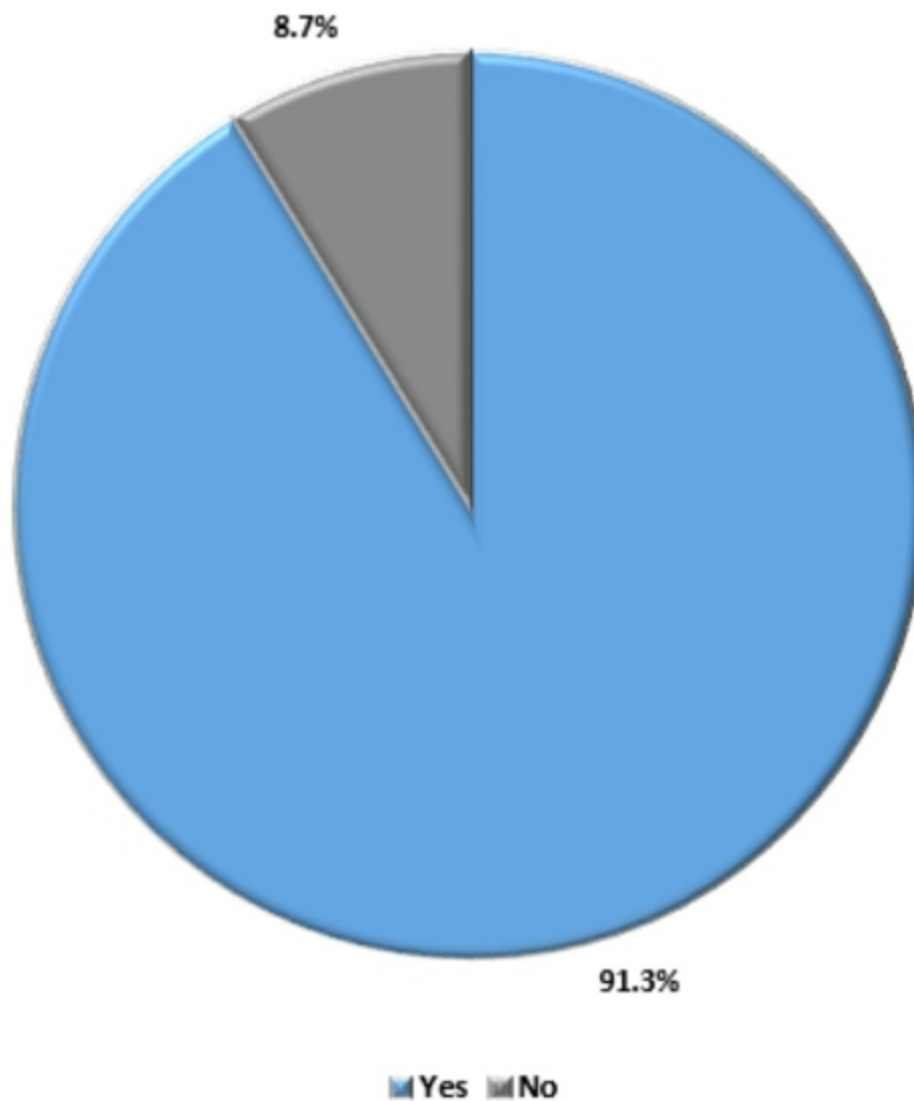






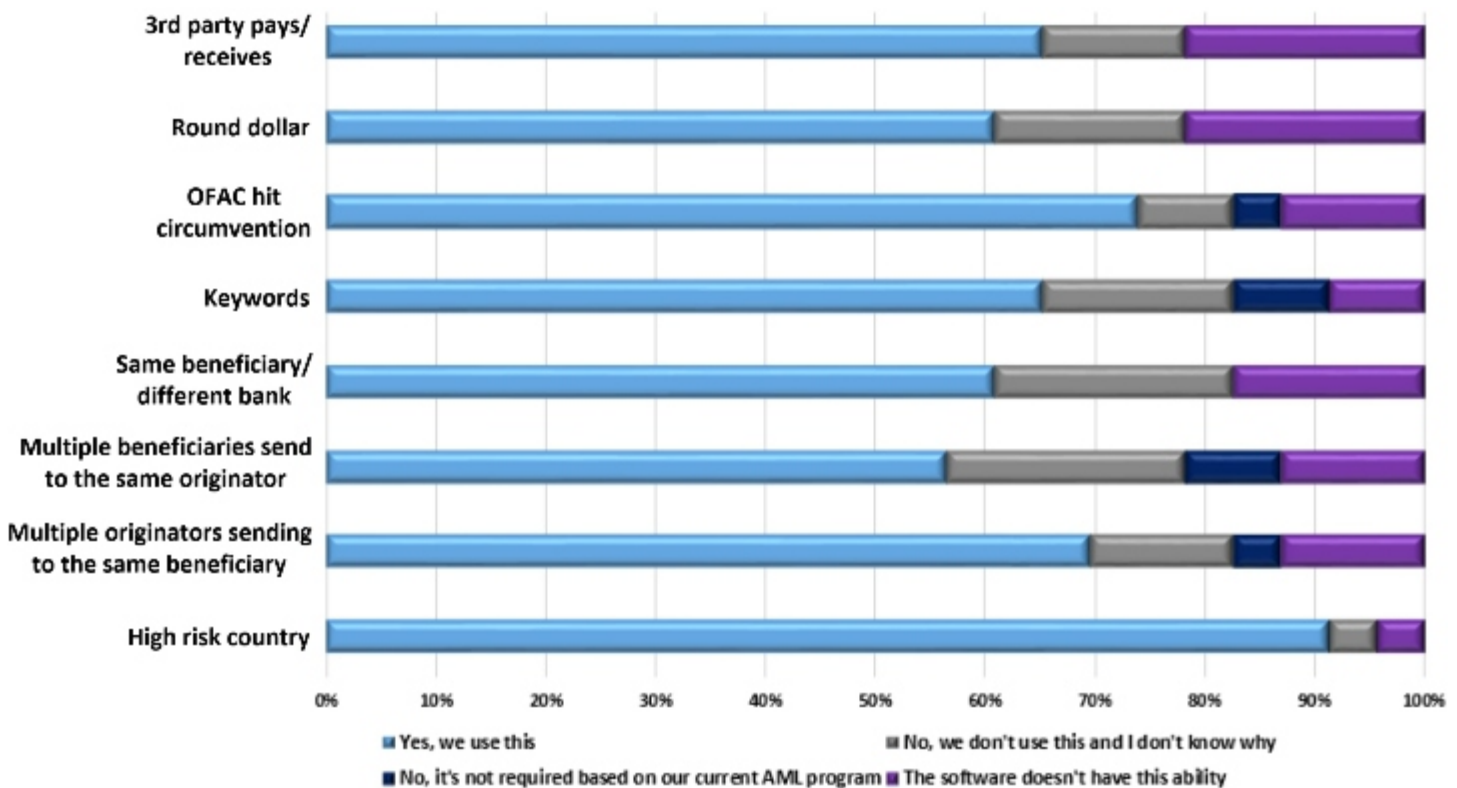
### *Software Training:*

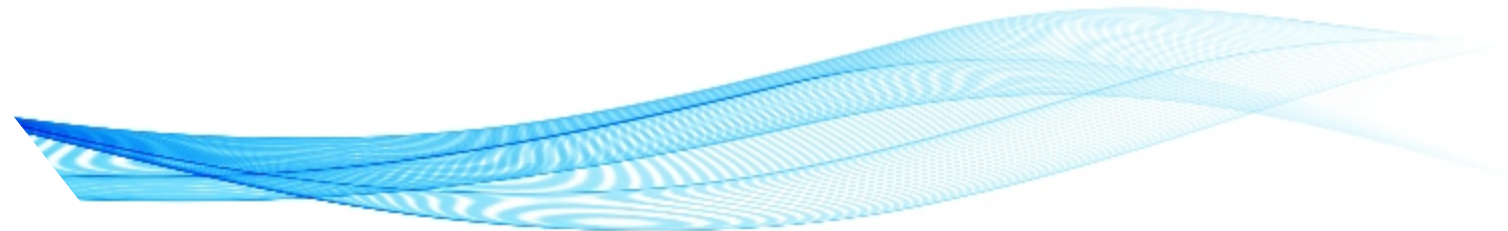
Not surprisingly, the vast majority of retail bank respondents took advantage of training for their BSA/transaction monitoring software by their vendor (93.1%).



## Rules - Wires:

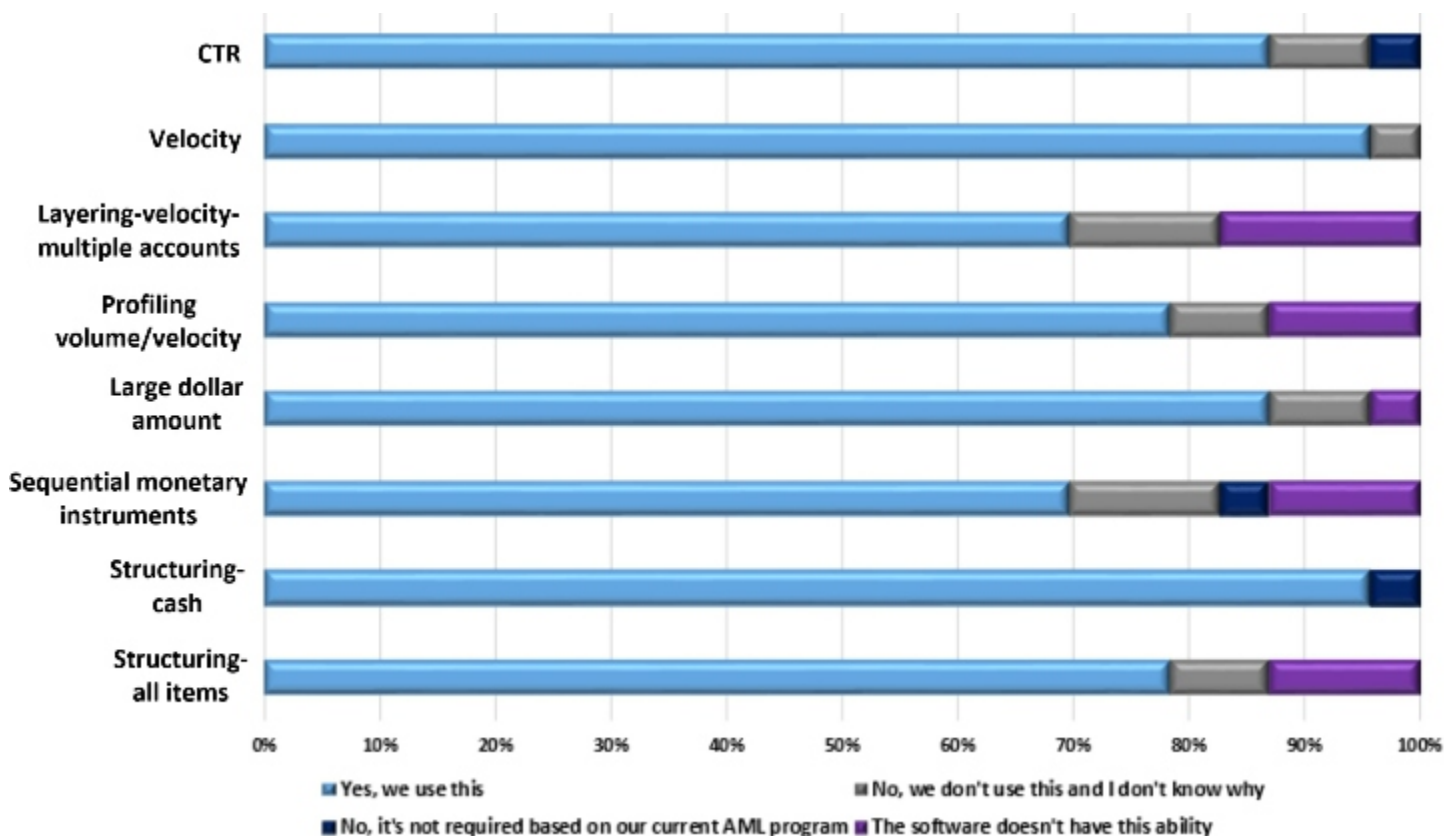
Similar to our general survey results, a large percentage of retail banks utilized a 'high risk country rule'. This was an interesting detail because most of our respondents are domestic community banks who rarely deal outside of the country. It was also interesting to note the low percentage of retail banks using a 'multiple beneficiaries sending to the same originator' rule.





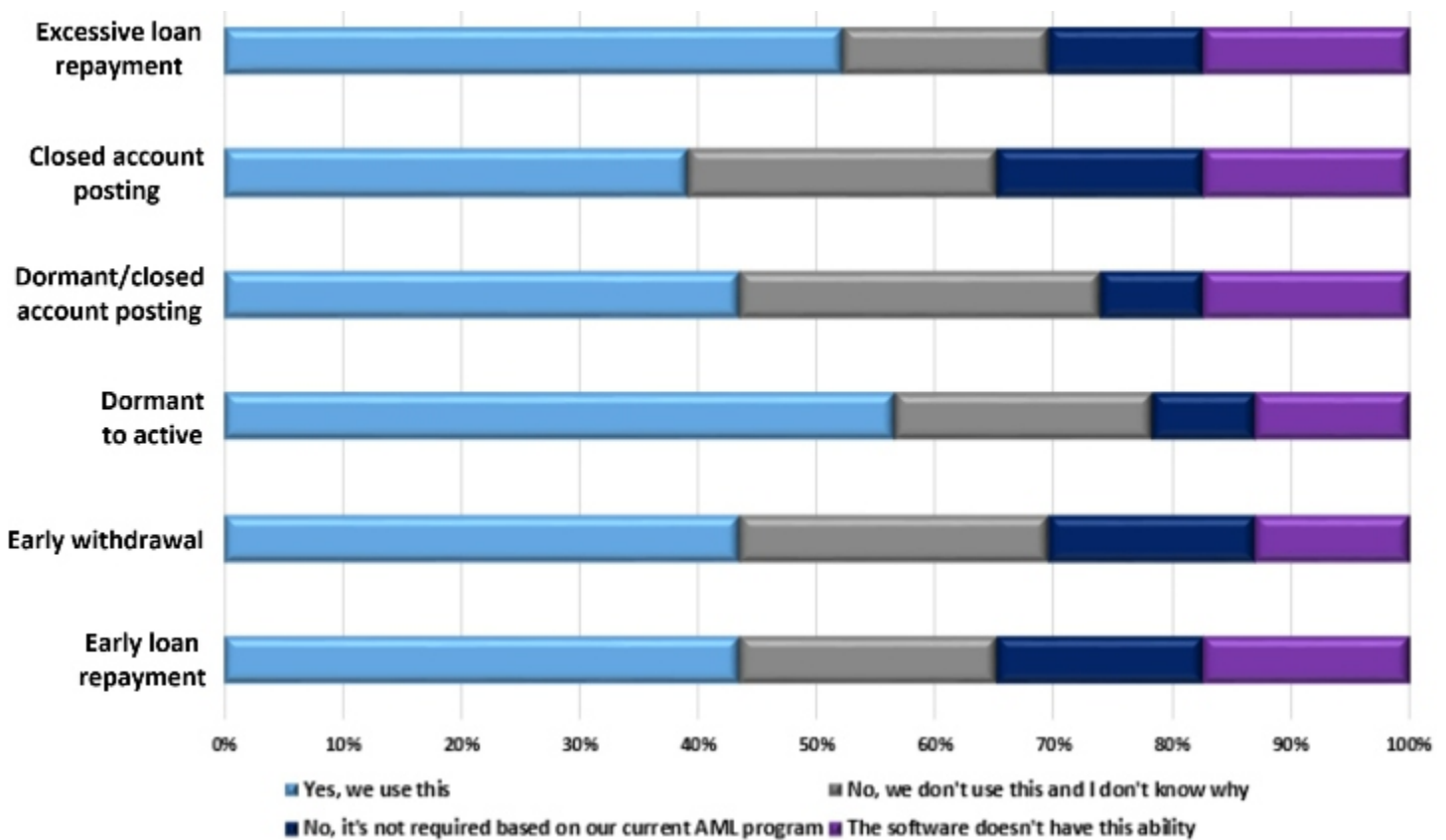
## Rules - Structuring:

Over 90% of our retail bank respondents use the 'velocity' rule and 'structuring - cash' rule with no one claiming their software can't monitor for either of those. However, under 10% said that they don't have to monitor cash structuring in accordance to their AML program. We also wondered whether our respondents utilized a true velocity rule, or a similar profiling rule.



## Rules - Control:

In comparison to the other common rules, control rules have a lot more variance as far as who does and doesn't use them. This group of rules has the most respondents saying that they don't use the rule and don't know why, or that it isn't required as part of their AML program. We've noticed that many community banks don't have had trouble with controls, so these findings were expected.



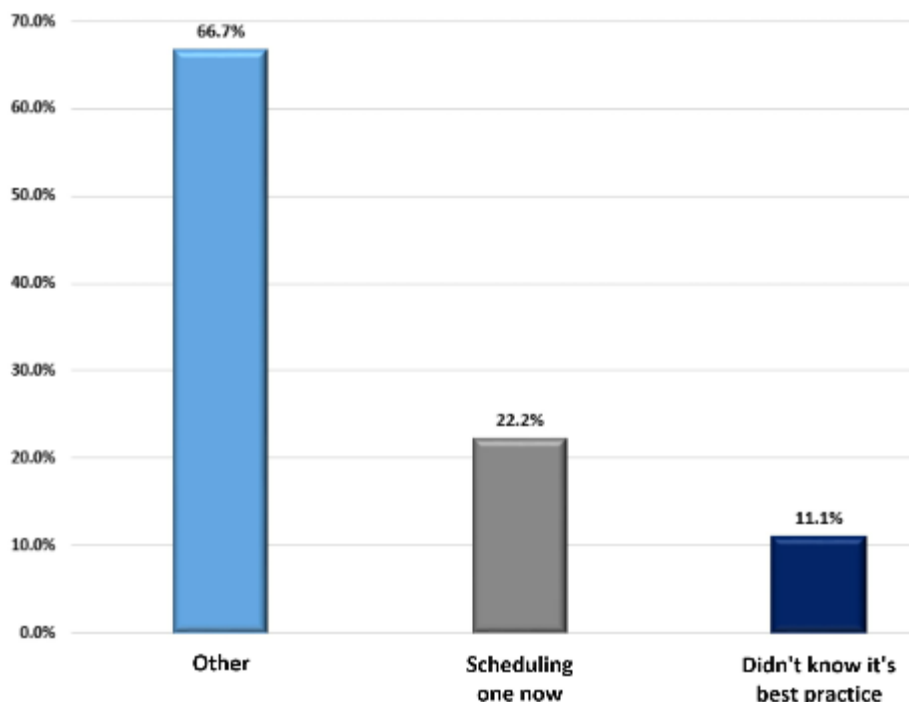
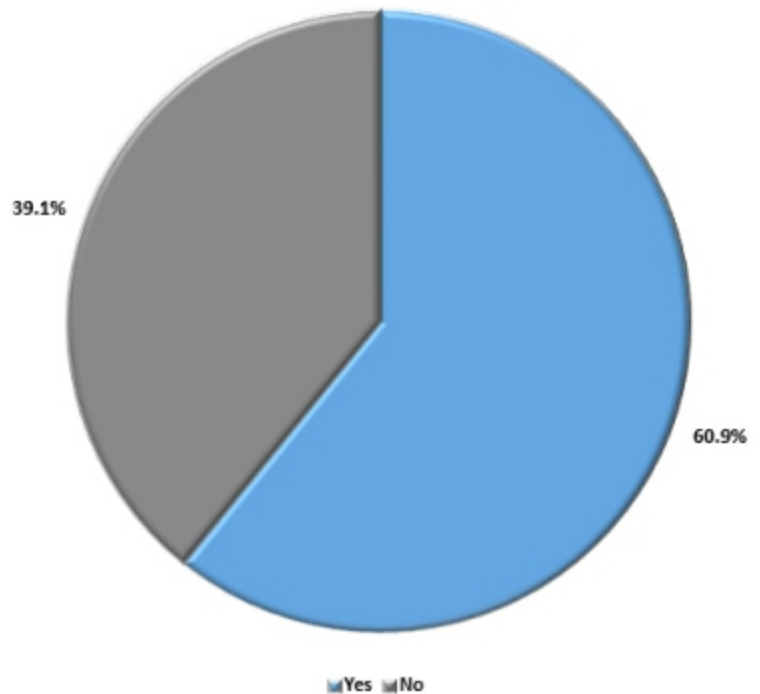




## Retail Banks: BSA Software Post-Implementation Questions

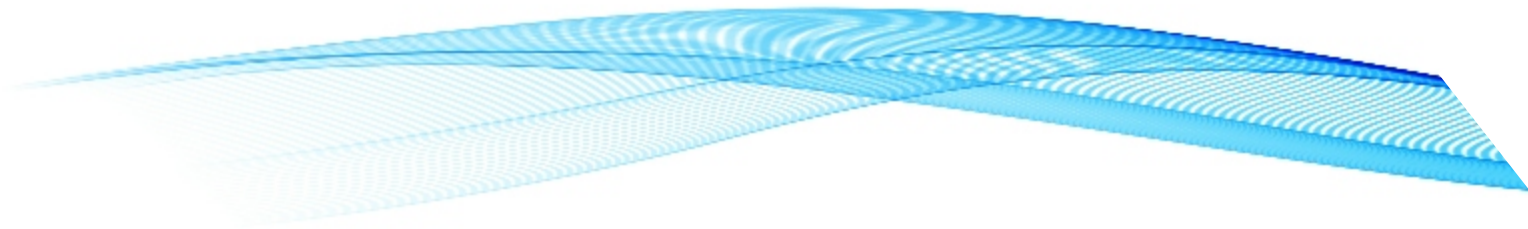
### *Conduct Independent Model Validation:*

Of retail banks the majority of our respondents said that they did conduct a model validation after implementing their BSA/transaction monitoring software (60.9%), but a surprisingly large percentage of 39.1% did not.



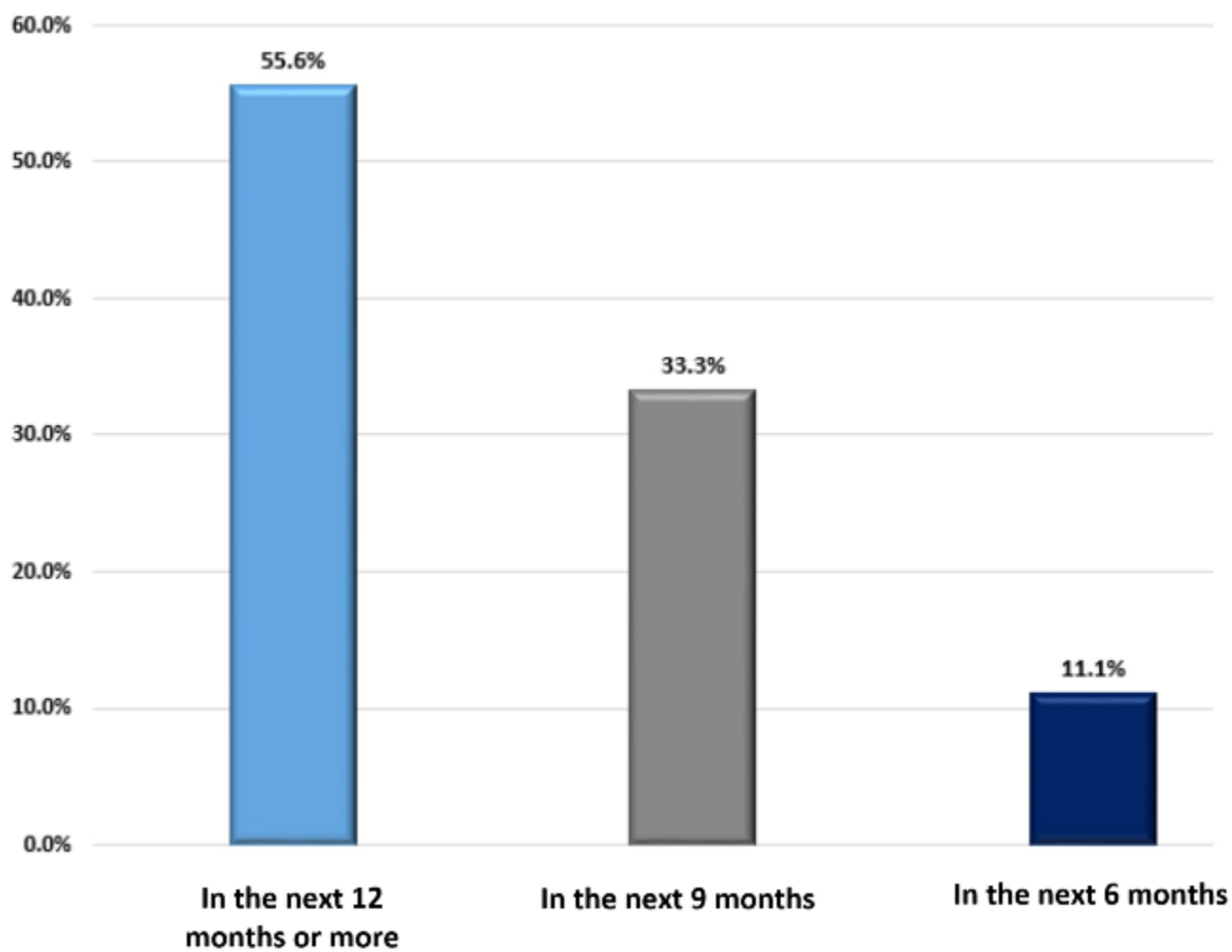
### *Did not Conduct:*

When we asked those respondents who said they have not conducted a model validation post-implementation on their BSA/transaction monitoring system, the overwhelming majority (66.7%) selected the answer 'other' as to why they haven't.



### *Model Validation Timeframe:*

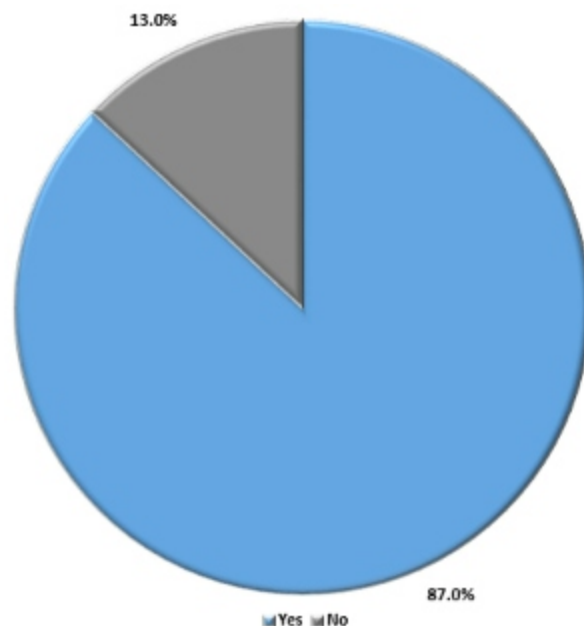
For the retail bank respondents who haven't conducted a model validation yet post-implementation on their BSA/transaction monitoring software, everyone plans to conduct one in the next 12 months with 33.3% in the next 9 months and just 11.1% in the next 6 months. That's a little surprising since a good rule of thumb is 3-6 months post-implementation. Best practice would be to consider one before a year has passed post-implementation.



## Retail Banks: BSA Software Features Questions

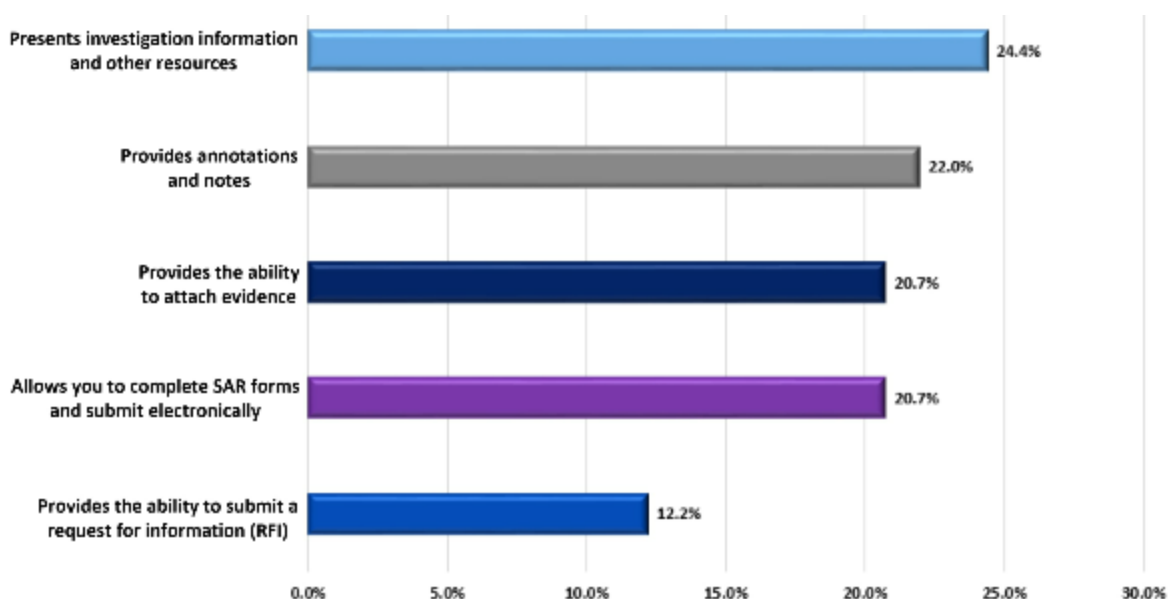
### *Alert/Case Management:*

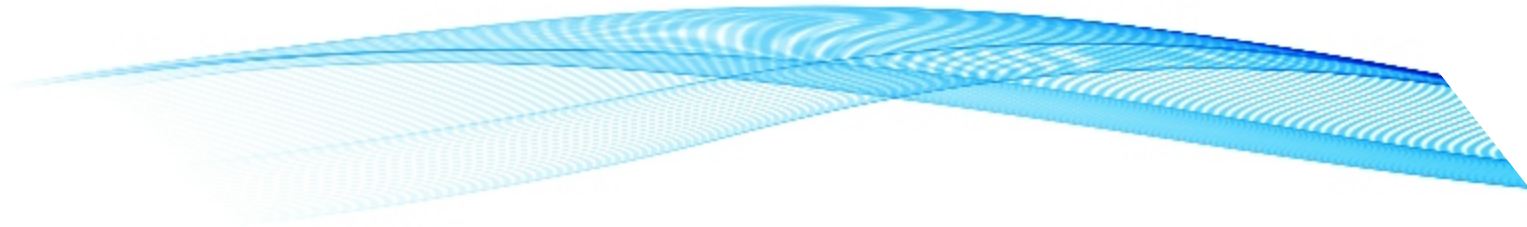
Not surprisingly, 87% of our retail bank respondents say that their BSA/transaction monitoring software has alert/case management as a feature.



### *Additional Features:*

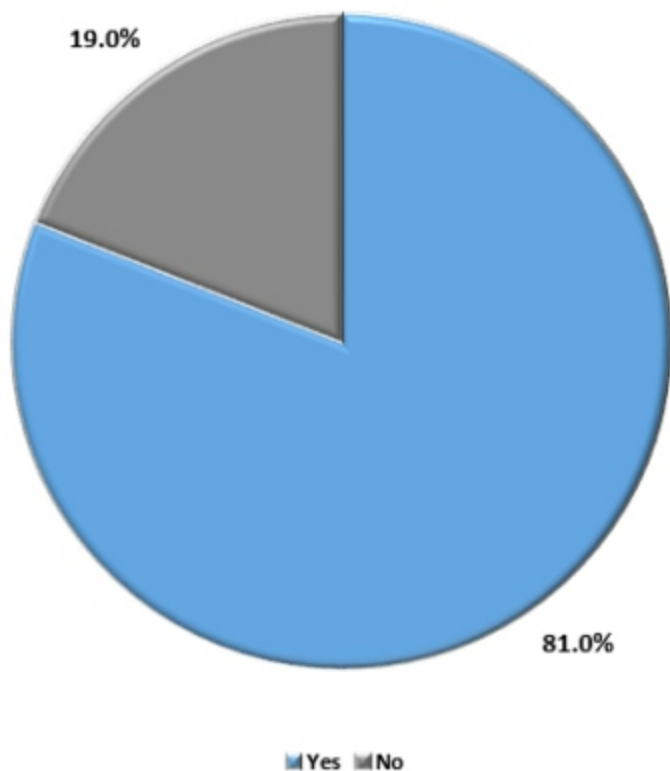
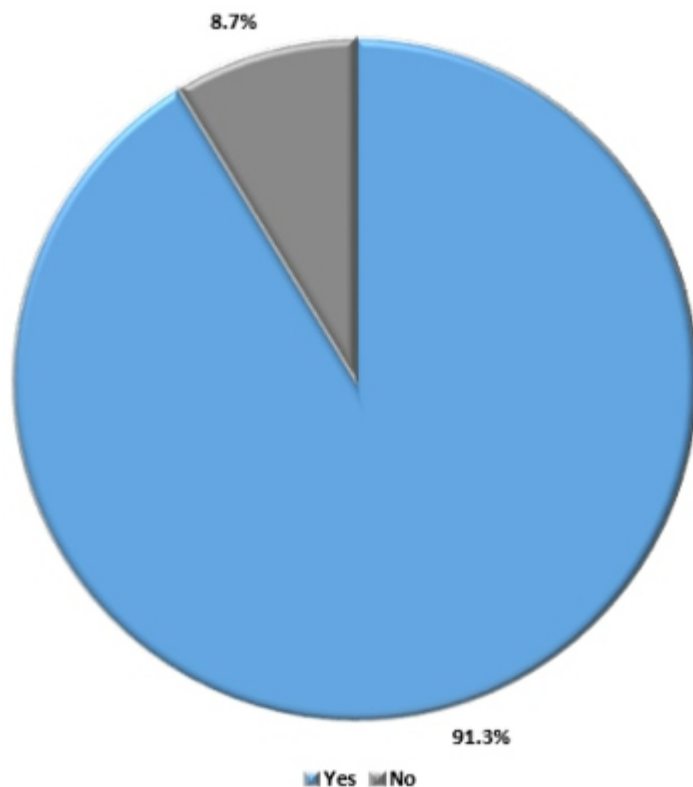
Between a quarter and a fifth of retail bank respondents' software has the ability to present investigation resources, provide annotations and notes, the ability to attach evidence, as well as complete SAR forms electronically.





### *Dashboard:*

The majority of retail banks reported that they have a dashboard feature within their BSA/transaction monitoring software (91.3%).



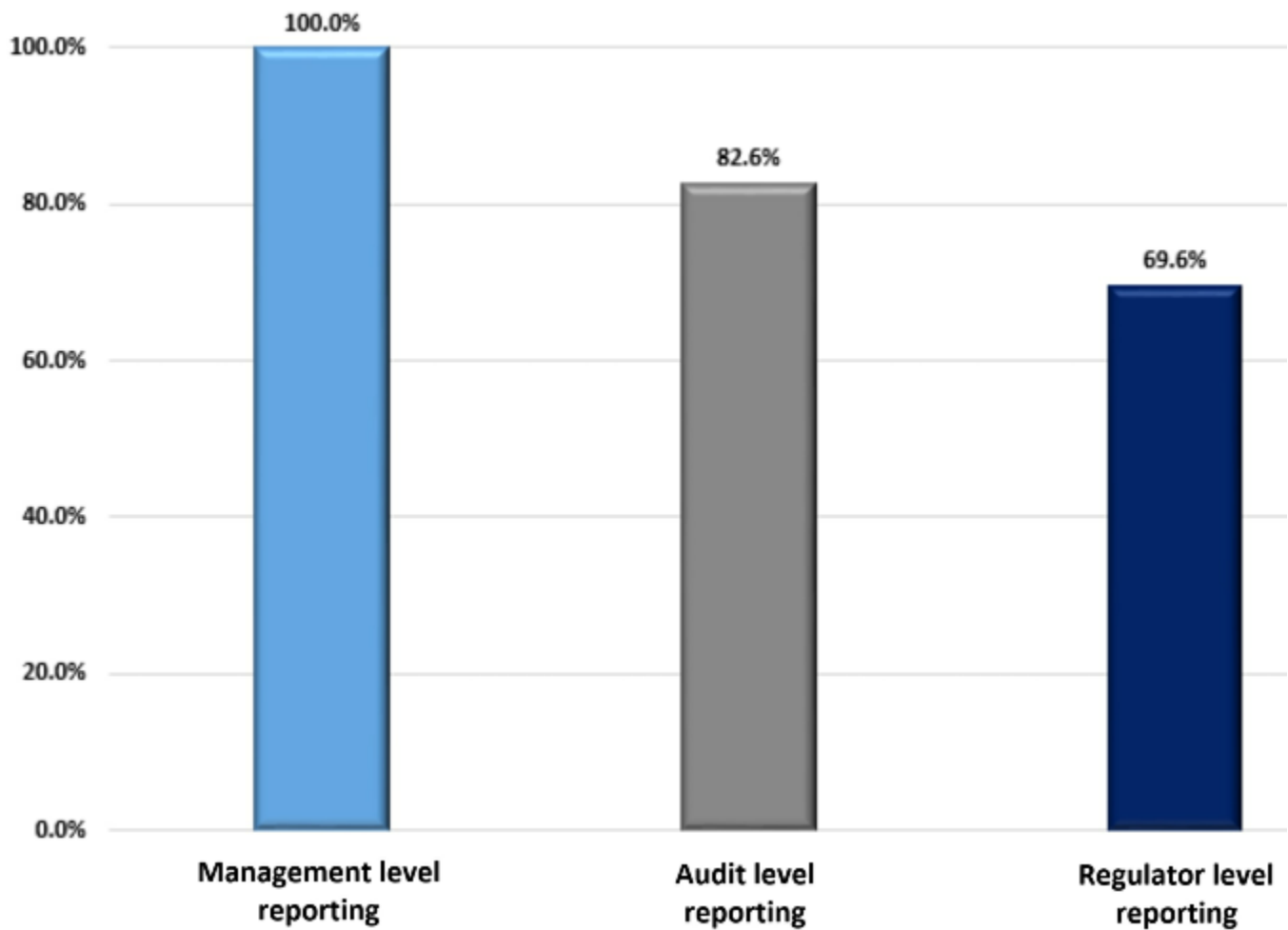
### *Dashboard - Link Select*

Less respondents than those who have a dashboard feature in their BSA/transaction monitoring software say that they can drill down into dashboard data; however, it is still a large majority of the participants (81%).



## Reporting:

Retail bank survey participants exceeded expectations, 100% have at least management level reporting in their BSA/transaction monitoring software. 82.6% have audit level reporting, and 69.6% have regulator level reporting

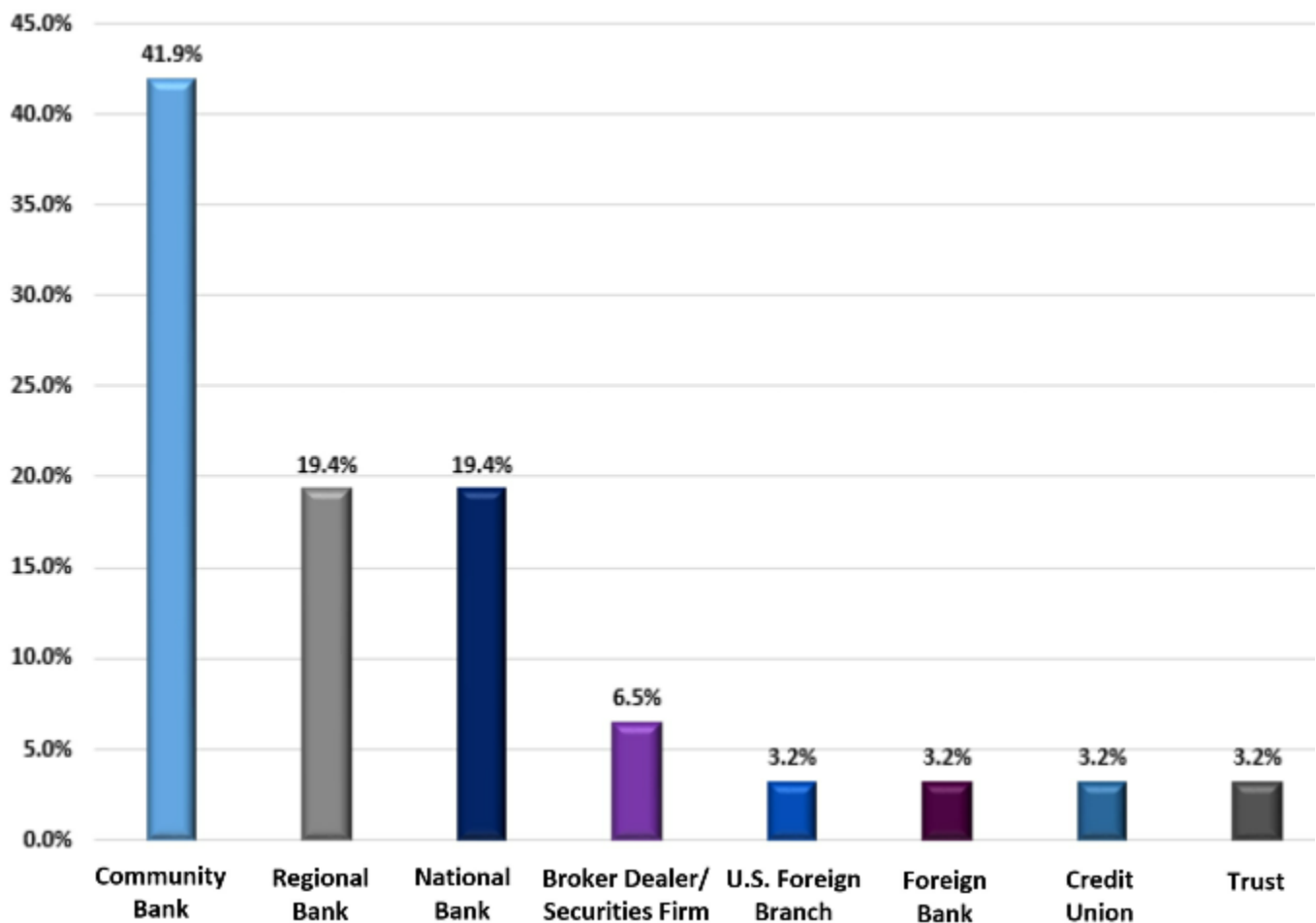




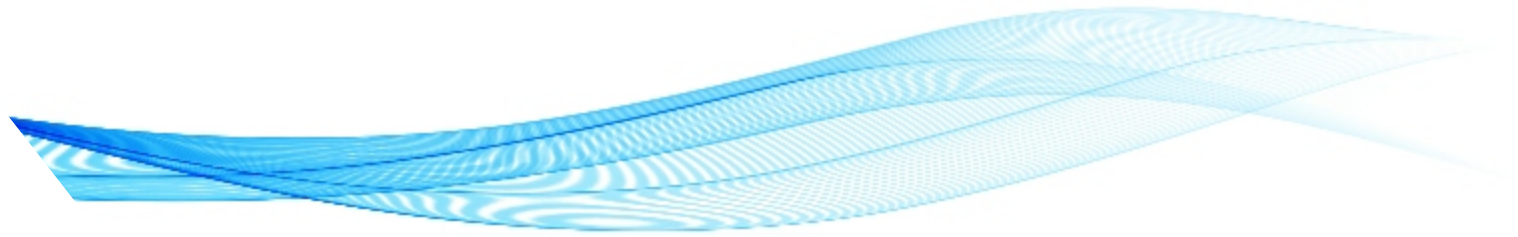
## Commercial Banks: Demographic Questions

### *Institution Type:*

The majority of commercial banks represented a community bank at 41.9% with a sharp decline from there. The next two most common types of institutions represented a regional and national bank (each 19.4%).

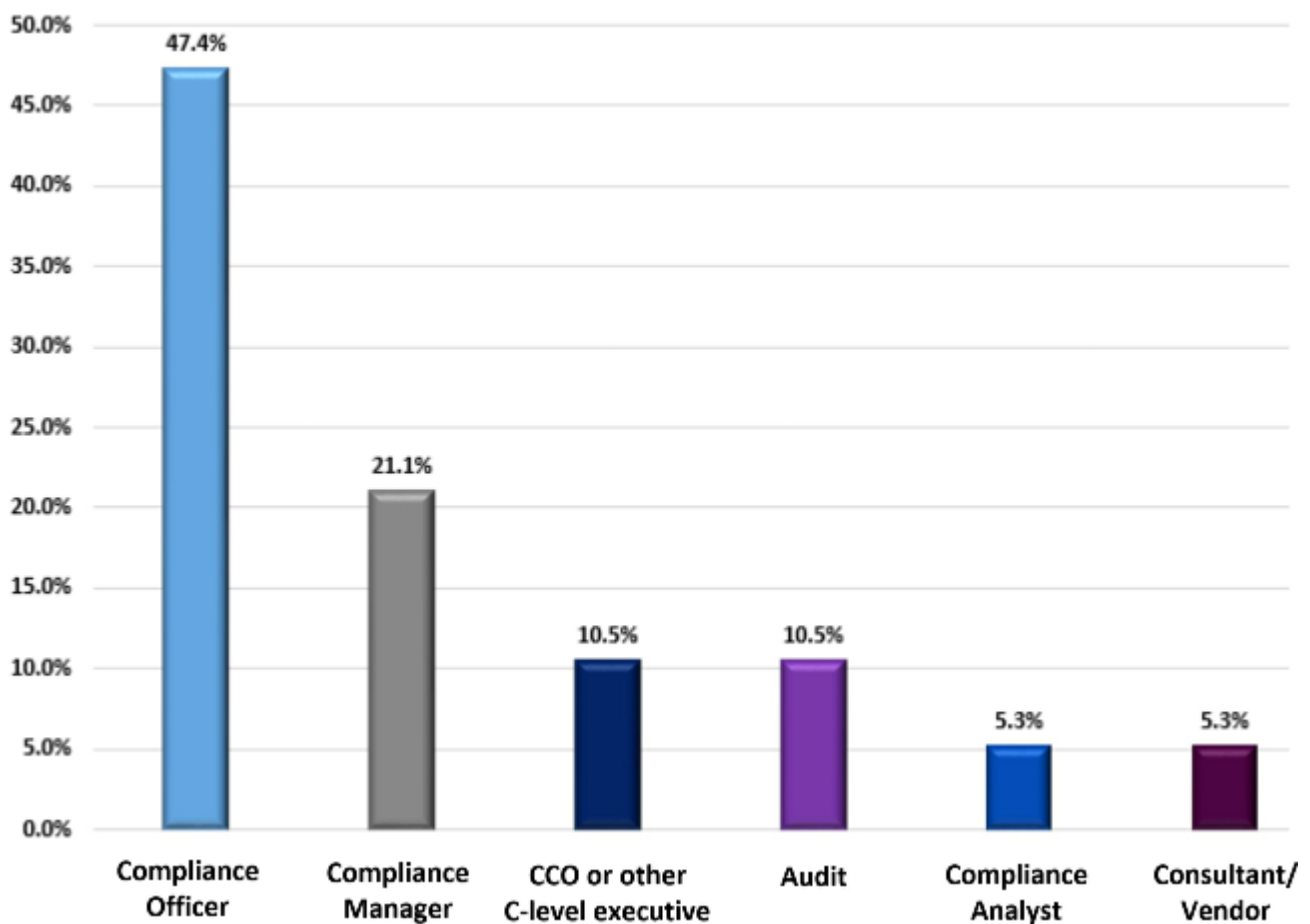






### *Current Position:*

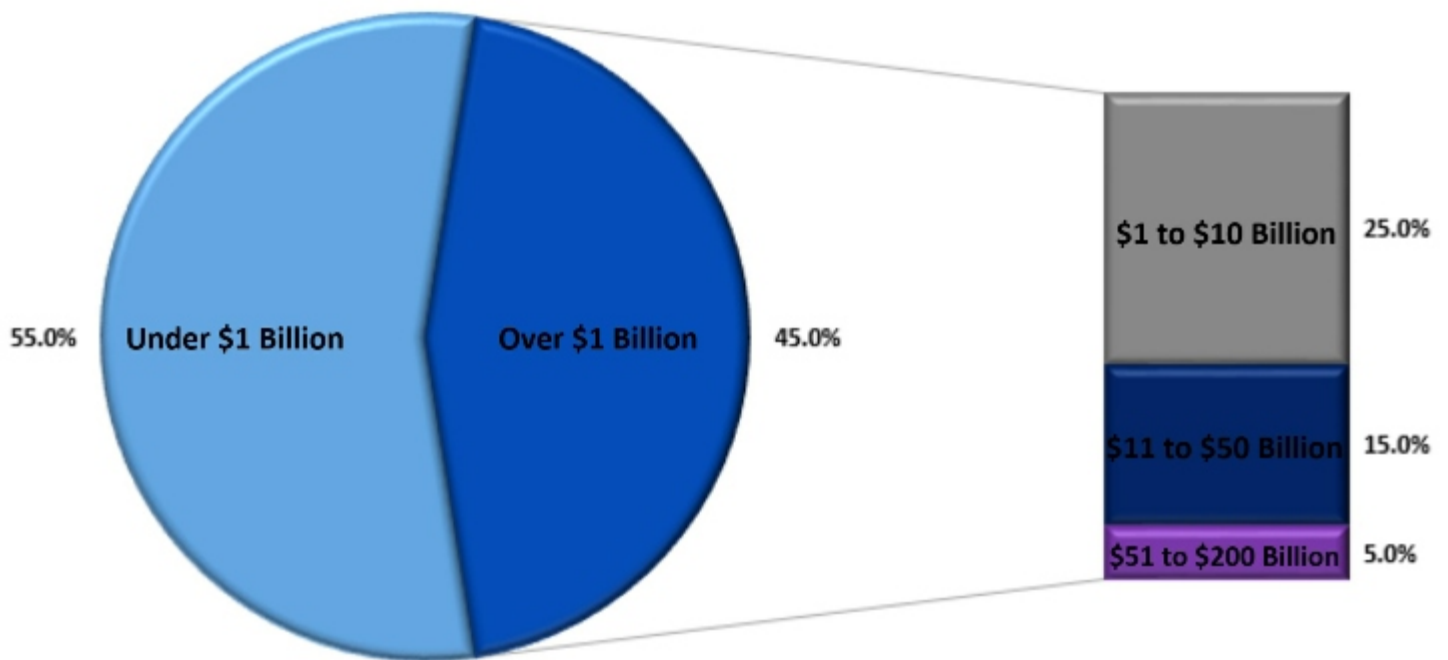
Compliance Officer was the most common job title for commercial banks to participate in this survey (47.4%). There was a steep decline after that, with the second most common job title being compliance manager (21.1%).

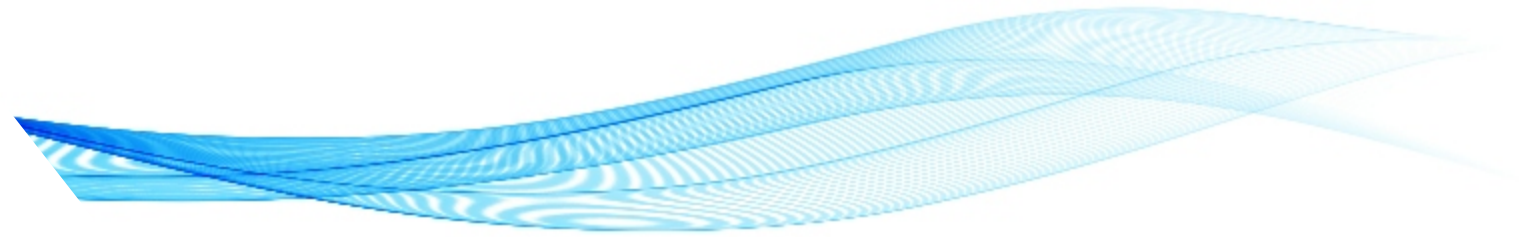




## Asset Size:

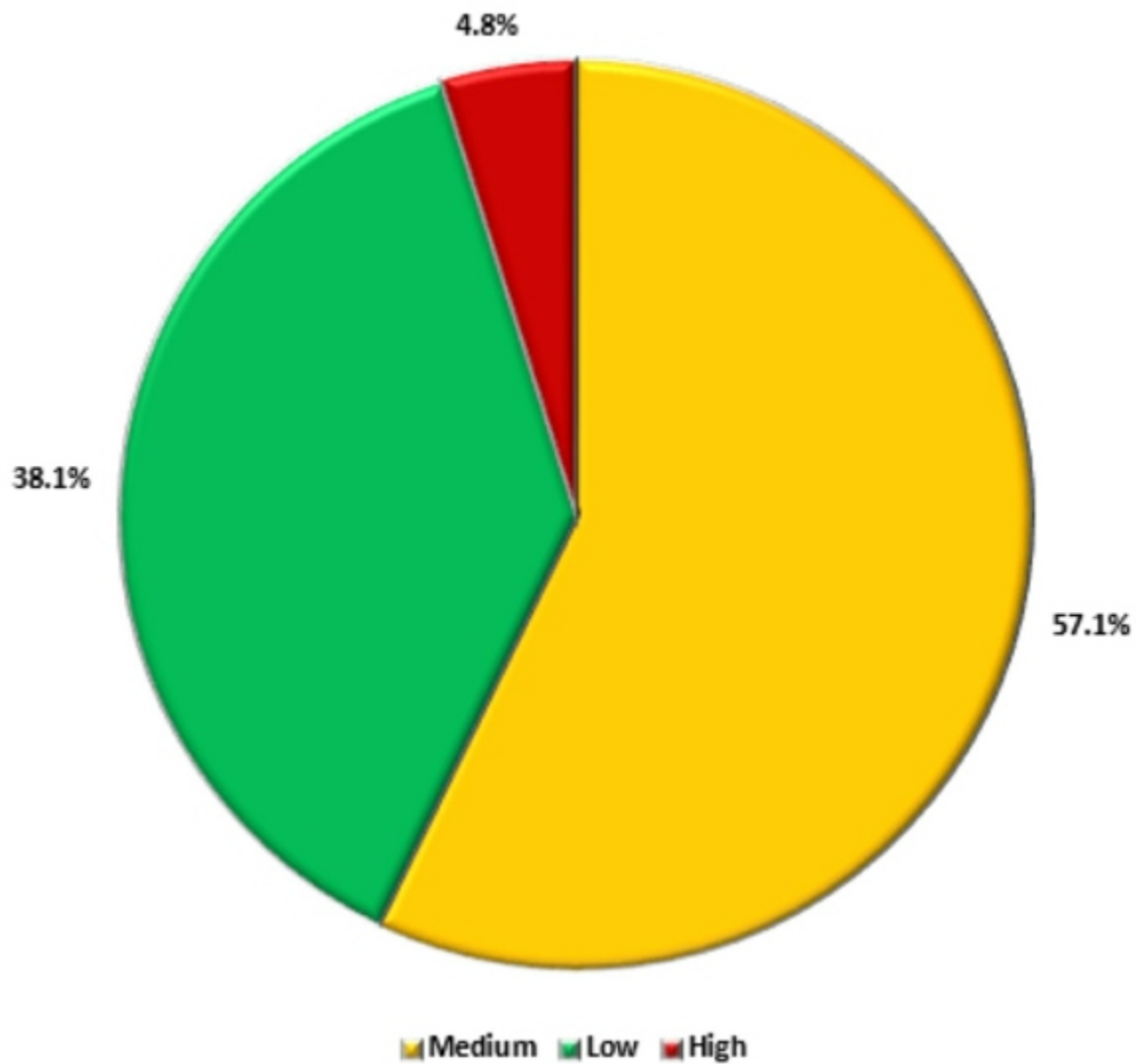
The majority of our commercial bank respondents are under \$1 billion at 55%. This is interesting because in both the general survey results and retail bank results, the majority of respondents' reported assets over \$1 billion.





### *Risk Rating:*

As expected the majority of commercial bank respondents have medium risk rating (57.1%). A larger than average portion of commercial bank respondents have a low risk rating (38.1%).

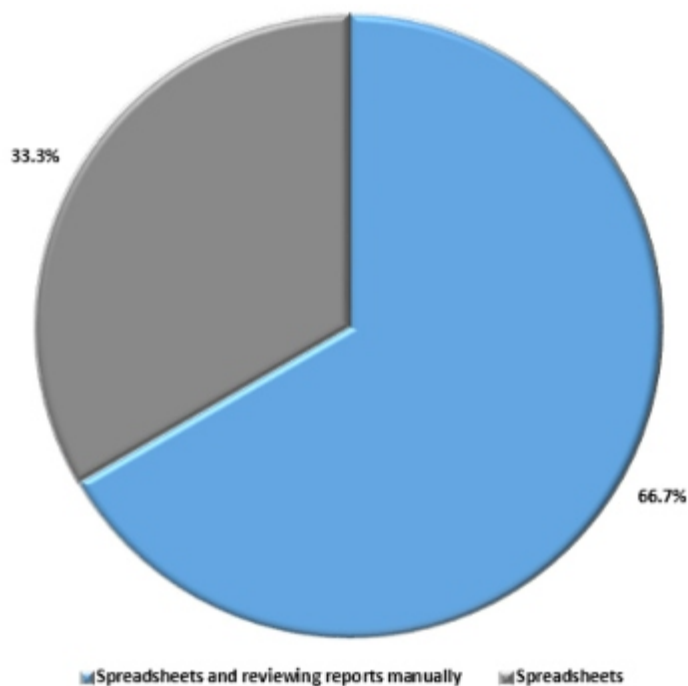
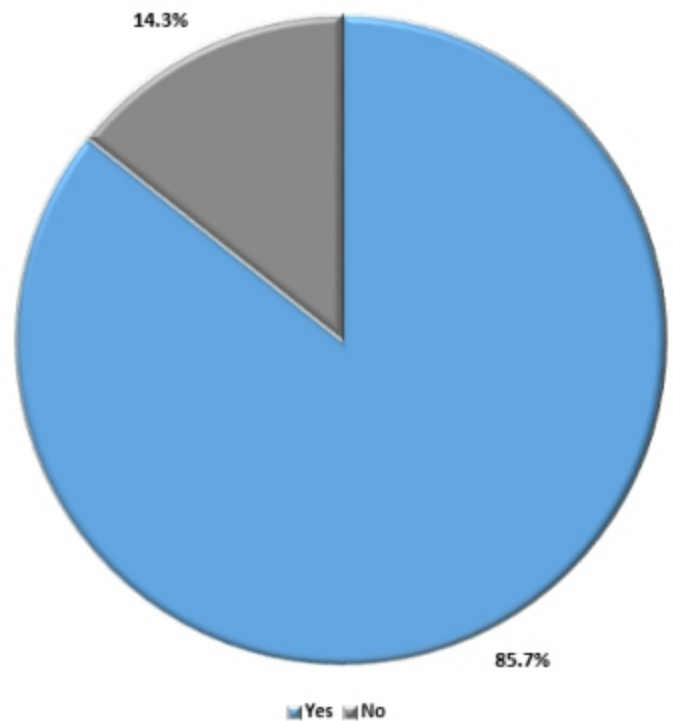




## Commercial Banks: General BSA Software Questions

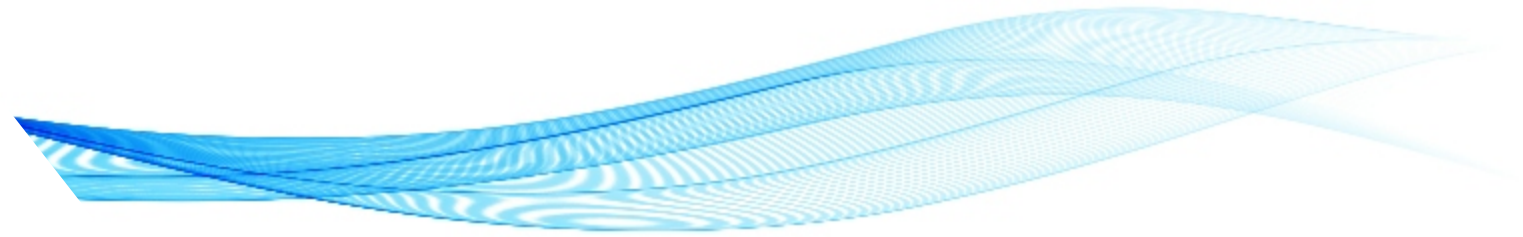
### *Transaction Monitoring Software Utilization:*

The majority of commercial bank respondents have BSA/transaction monitoring software (85.7%), which is less than retail bank respondents.



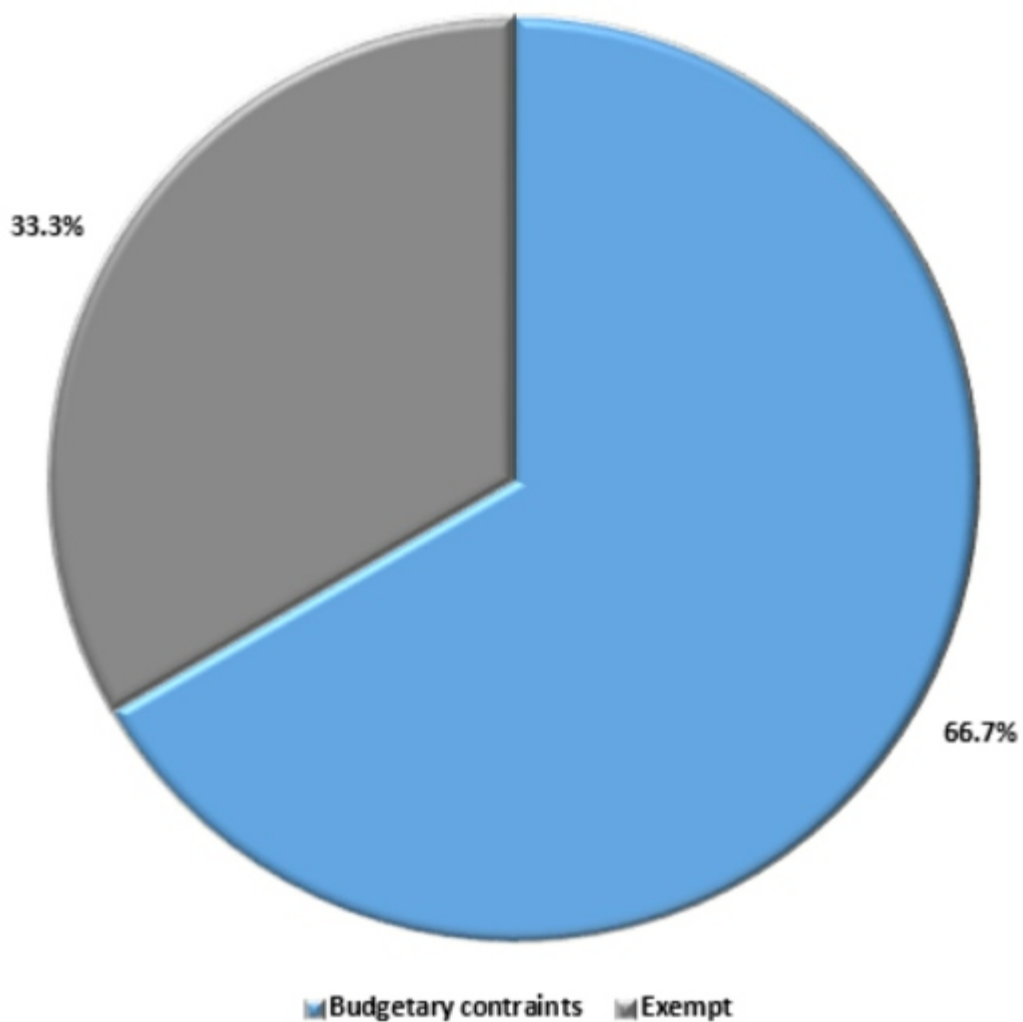
### *Software Alternatives:*

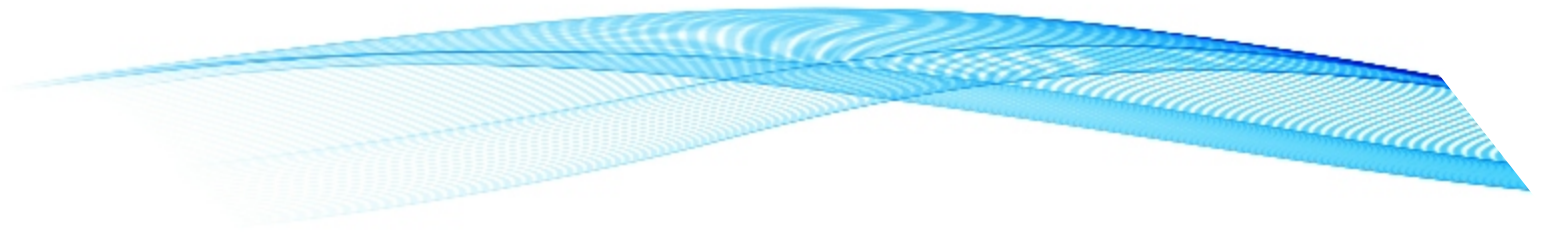
For those commercial bank respondents that don't use BSA/transaction monitoring software, two-third's of our respondents use spreadsheets and review reports manually to monitor their transaction activity (66.7%) while the other one-third use spreadsheets only.



### *Reasons they're not using Transaction Monitoring Software:*

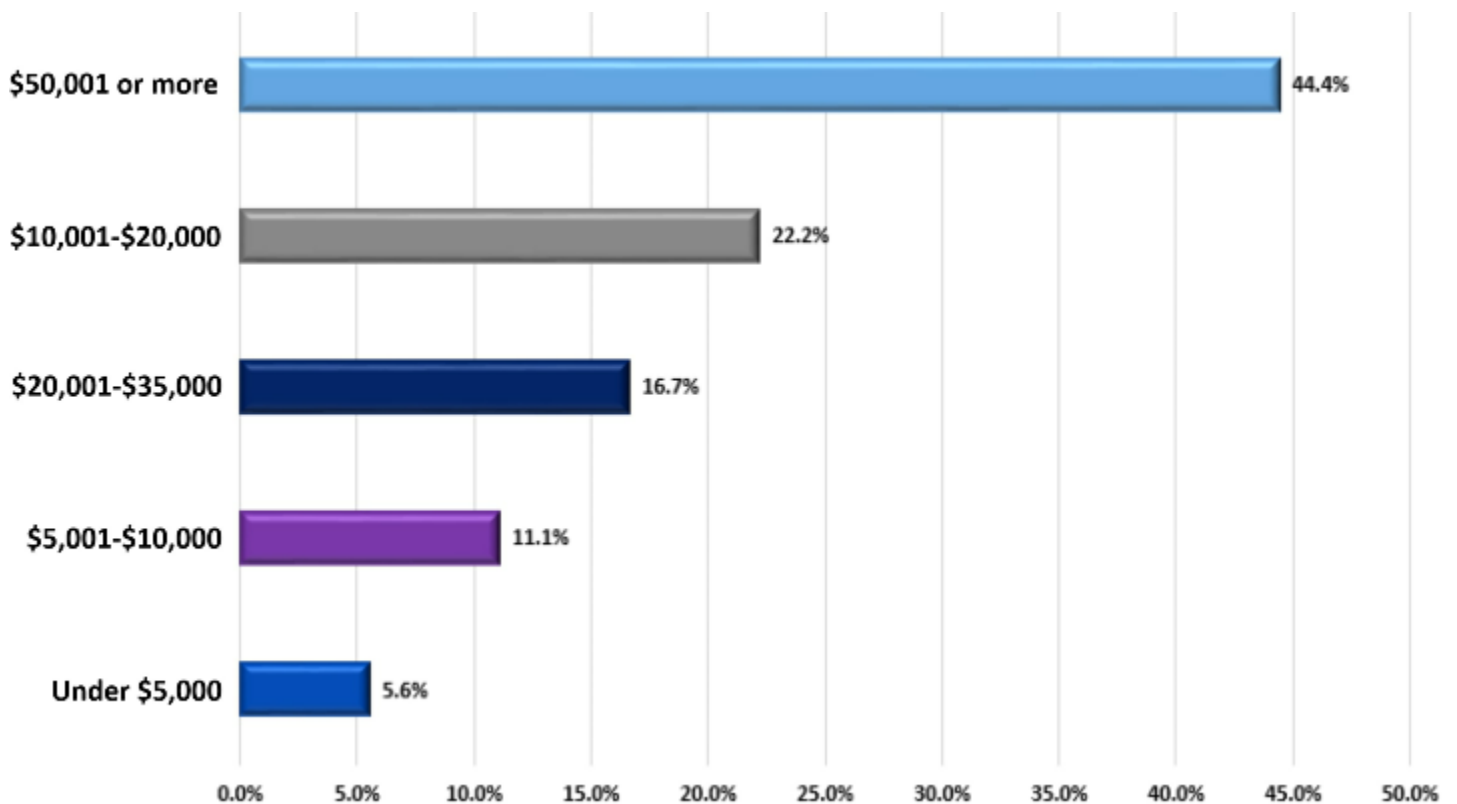
When it comes to the commercial bank respondents that don't have BSA/transaction monitoring, two-third's of the respondents said that they don't for budgetary reasons while the last third said they were exempt, likely for a number of transactions.



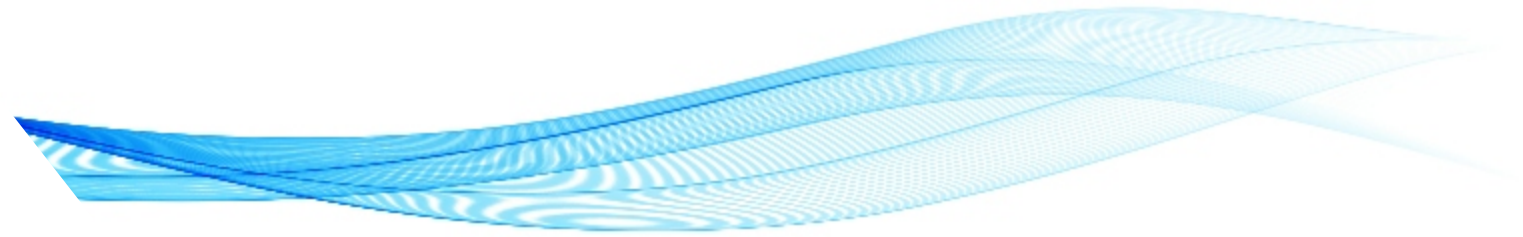


## Software Costs:

Most commercial bank respondents spend more than \$50,000 annually on their BSA/transaction monitoring software (44.4%), a combined 38.9% spend between \$10,000 to \$35,000, and 16.7% spend \$10,000 or less.

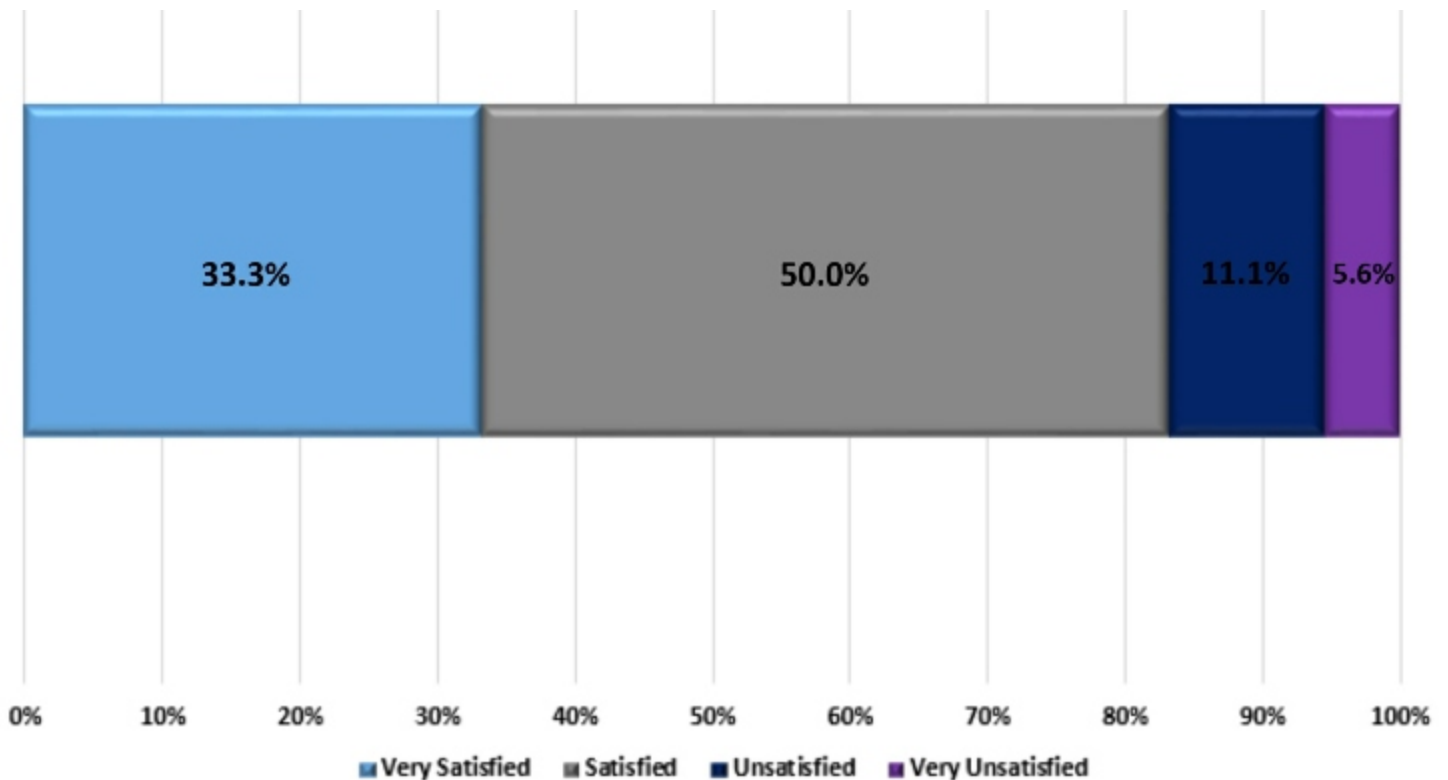


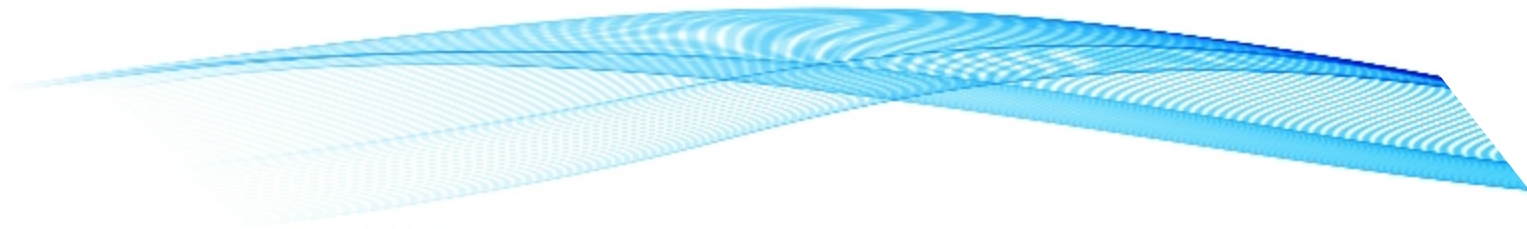




### Software Satisfaction:

83.3% of commercial bank respondents are either satisfied or very satisfied with their software. This is a marked increase from retail banks as well as the general results. Only 16.7% described themselves as unsatisfied or very unsatisfied.

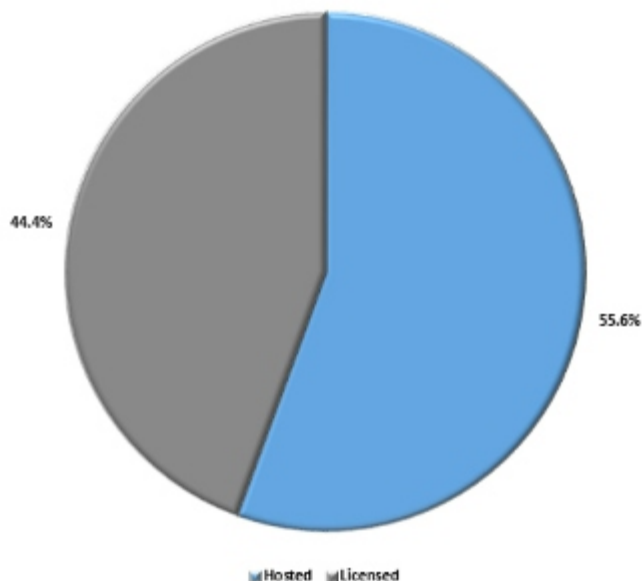




## Commercial Banks: BSA Software Technical Questions

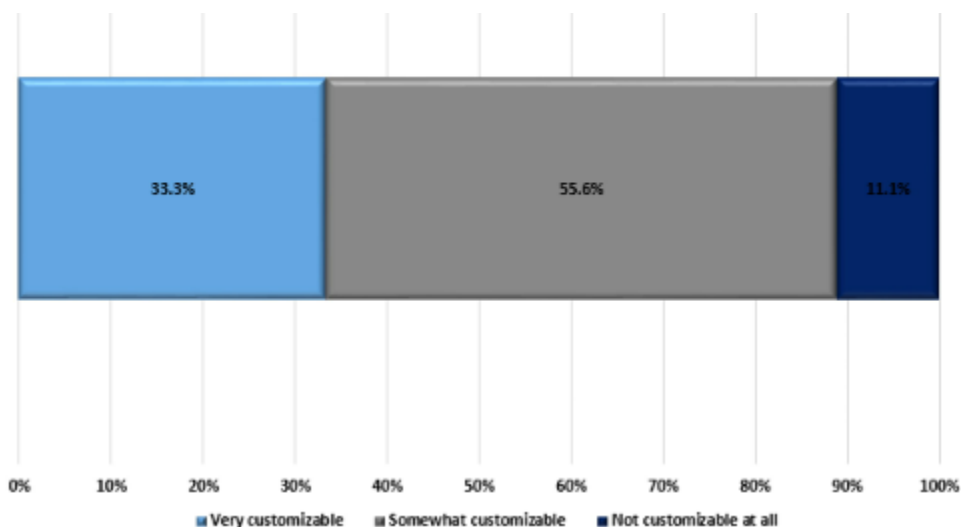
### *Hosted or Licensed:*

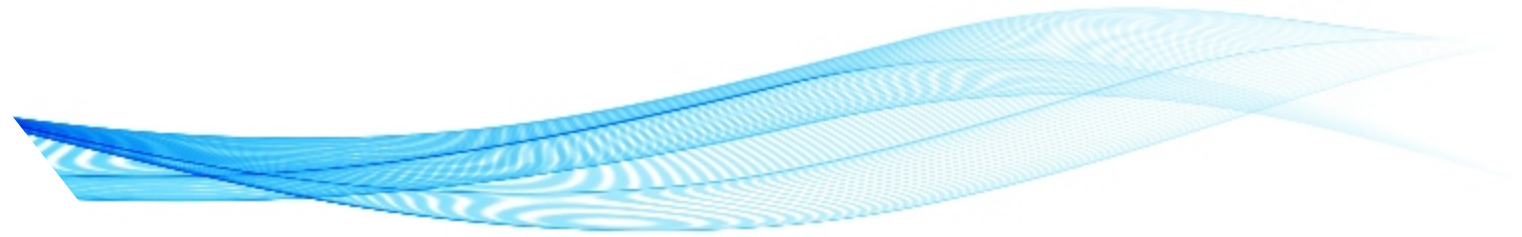
Just over 50% of our commercial bank respondents are hosting their BSA/transaction monitoring software (55.6%).



### *Software Customization:*

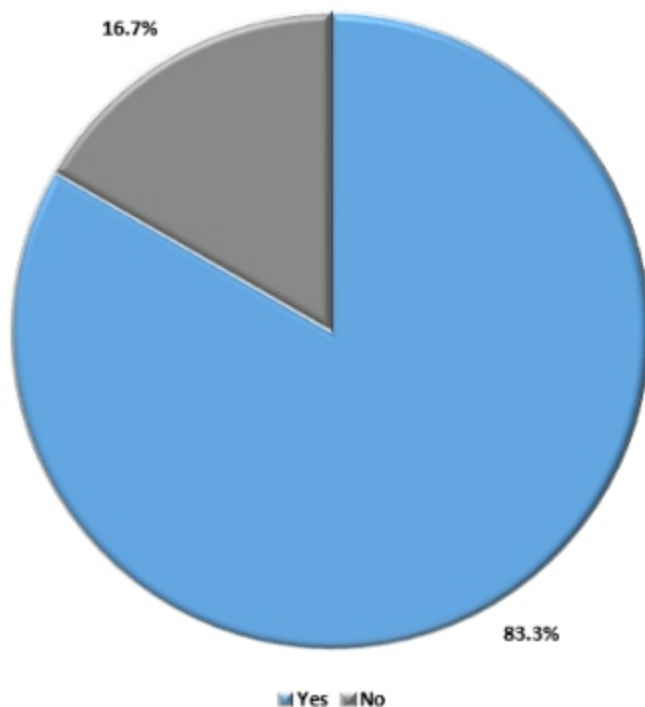
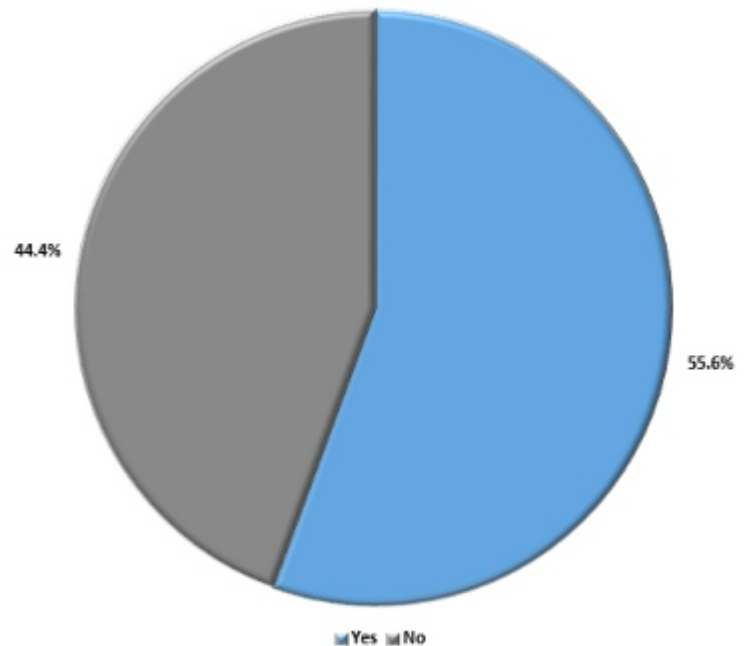
The largest group of commercial bank respondents say that their BSA/transaction monitoring software is somewhat customizable (55.6%) and a third said their software is very customizable. Only 11.1% have software that is not customizable at all.





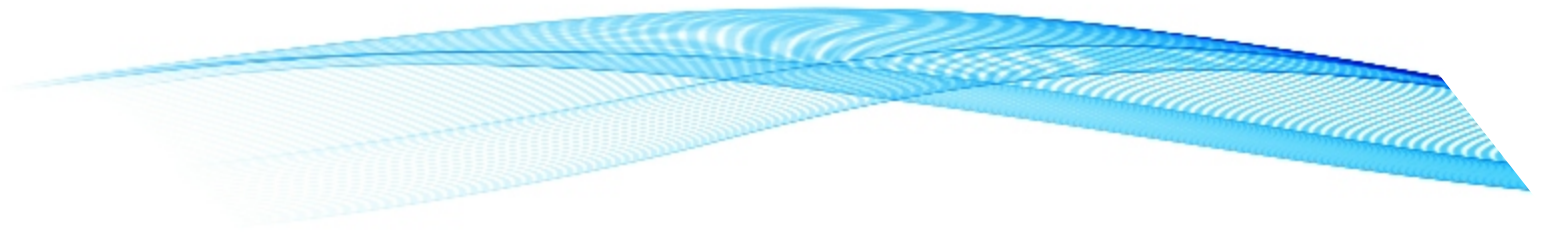
### *Test Server Access:*

In line with the commercial bank respondents that host their BSA/transaction monitoring software, the same amount say they have access to a test server with a complete and current replica of production (55.6%). This is odd to us as it has not been our experience to find those institutions that are hosting their software to also have a test server.



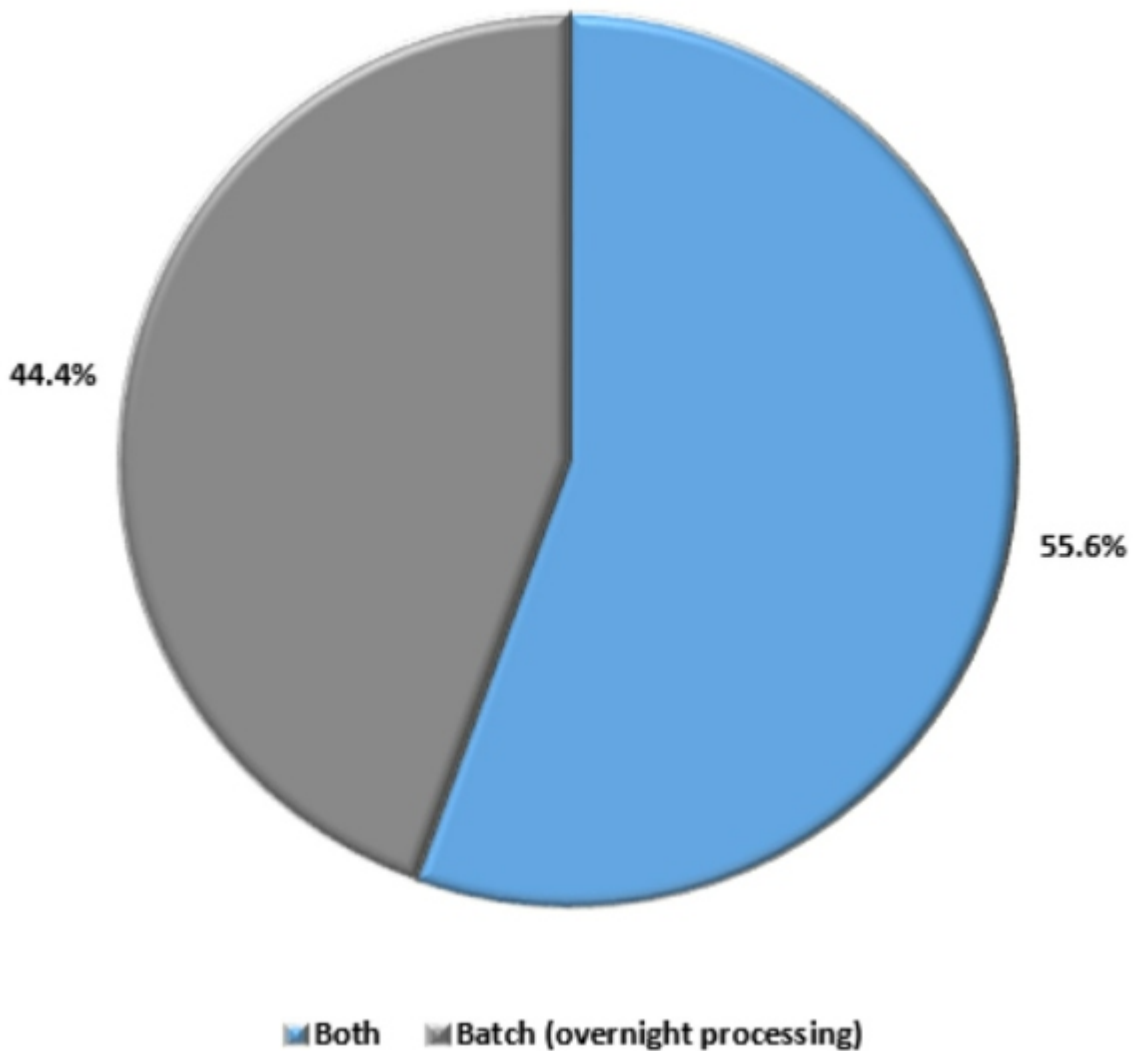
### *Profiling:*

The vast majority (83.3%) of our commercial bank respondents say that their BSA/transaction monitoring software uses profiling, as defined by comparing previous behavior to current behavior and alerting you to abnormal activity.



### *Real-Time, Batch, or Both?:*

Similar to our retail bank respondents, the larger majority of our commercial bank respondents say they process both in real-time and batch processing (55.6%).

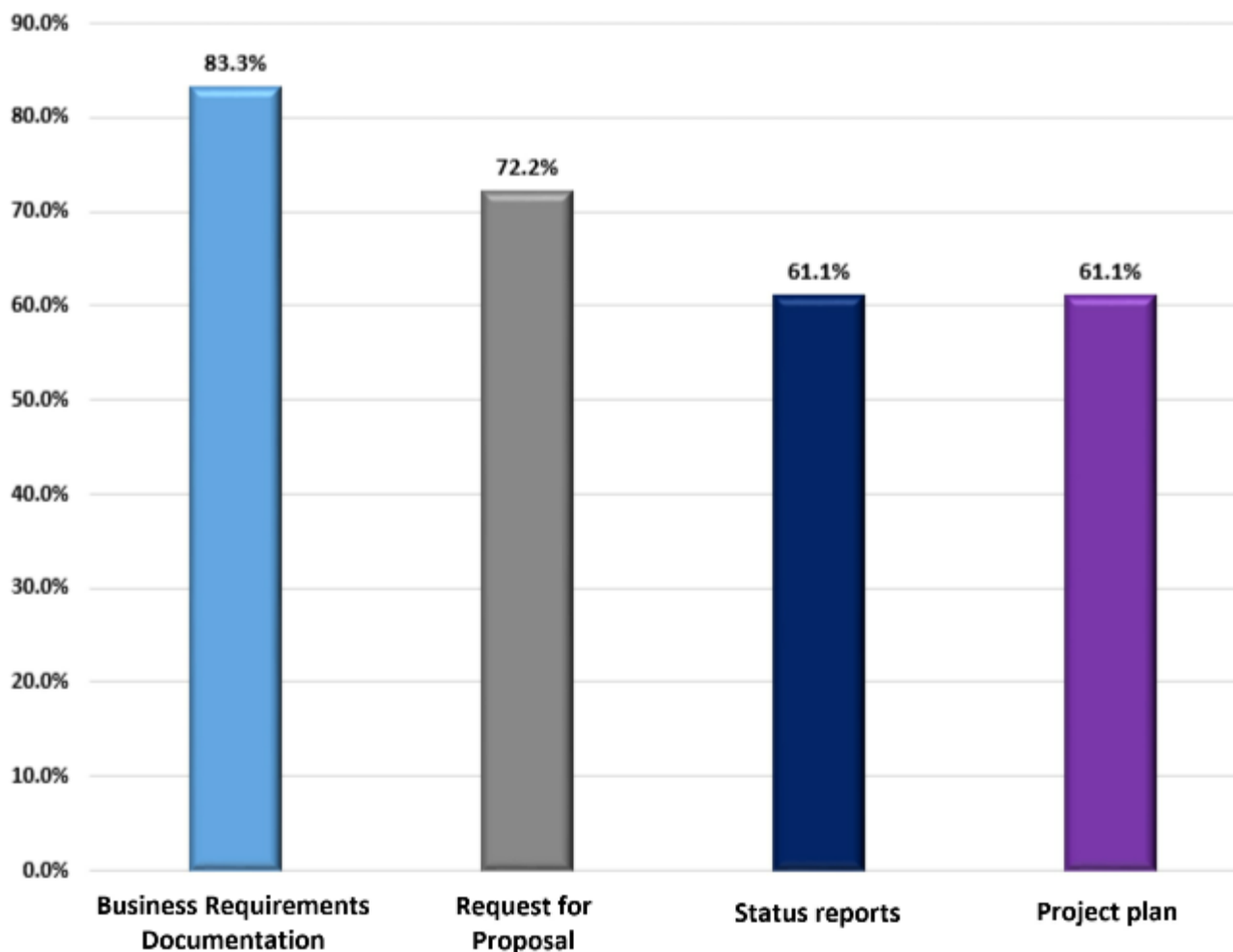




## Commercial Banks: BSA Software Pre-Implementation Questions

### *Pre-Implementation Tasks:*

Interestingly enough, 83.3% of our commercial bank respondents completed a business requirements document which outlines exactly what the business needs in terms of technical solution; 72.2% completed a request for proposal (RFP) from more than one software vendor; 61.1% created status reports throughout the project; as well as created a project plan of the implementation of their BSA/transaction monitoring software.

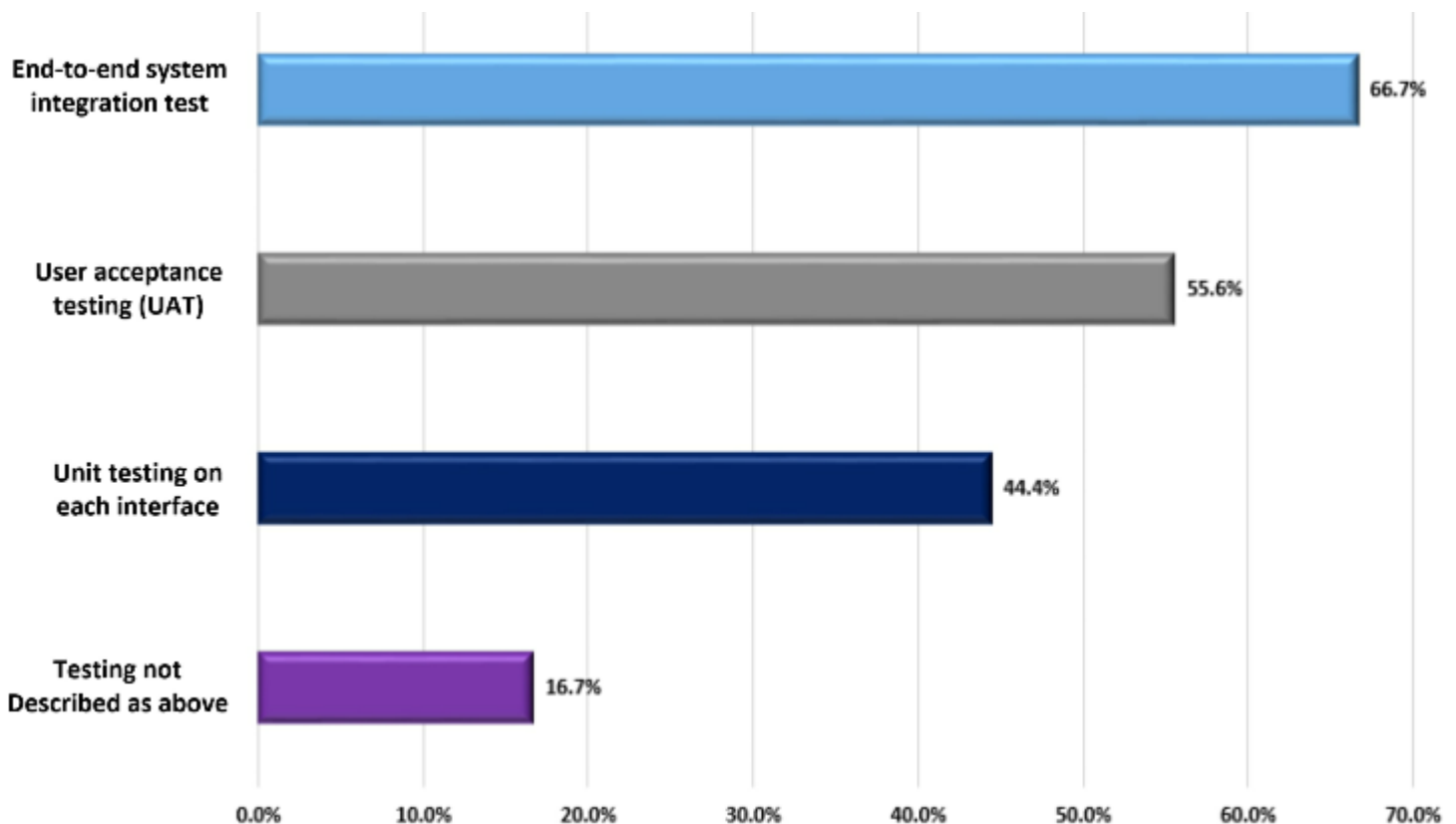




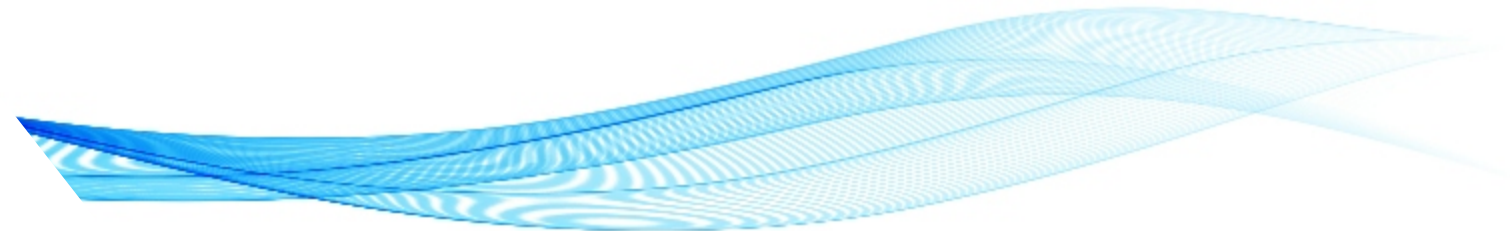
## Commercial Banks: BSA Software Implementation Questions

### *Implementation Tests:*

We asked our participants what type of testing they conducted on the software before their BSA/transaction monitoring software went into production/live, . 66.7% said they conducted an end to end system integration test on each interface; 55.6% said they conducted user acceptance testing; 44.4% conducted unit testing; and finally, 16.7% conducted some other kind of testing not previously mentioned.

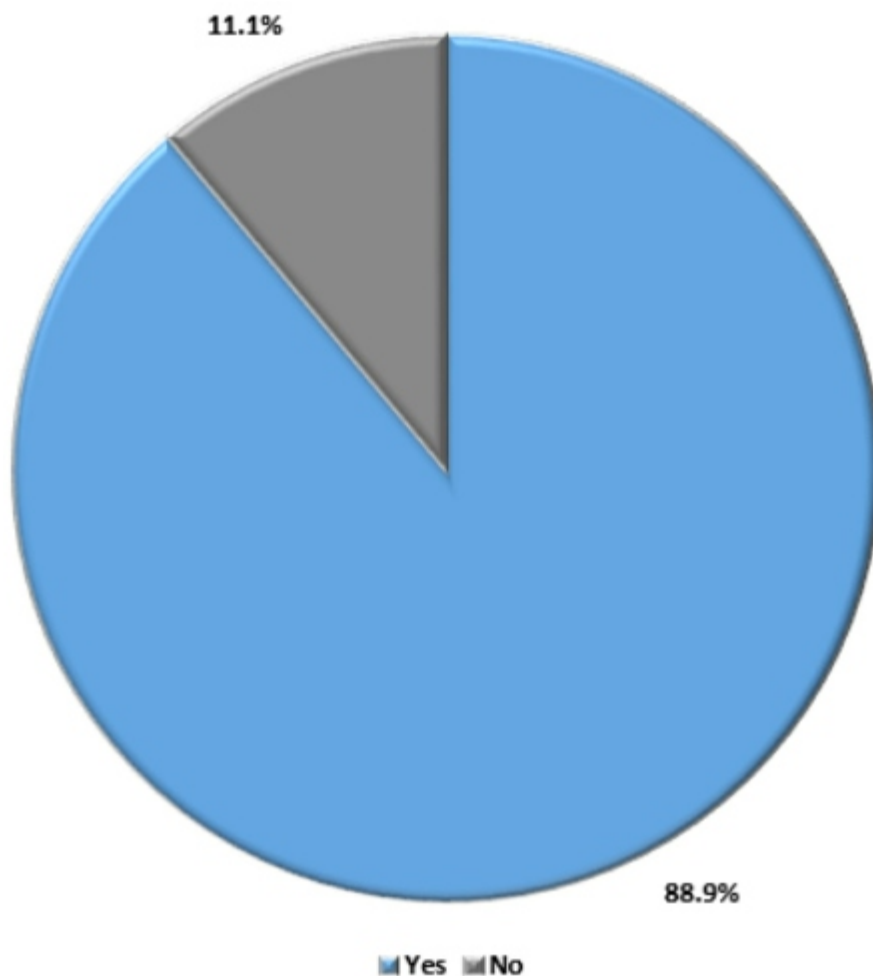






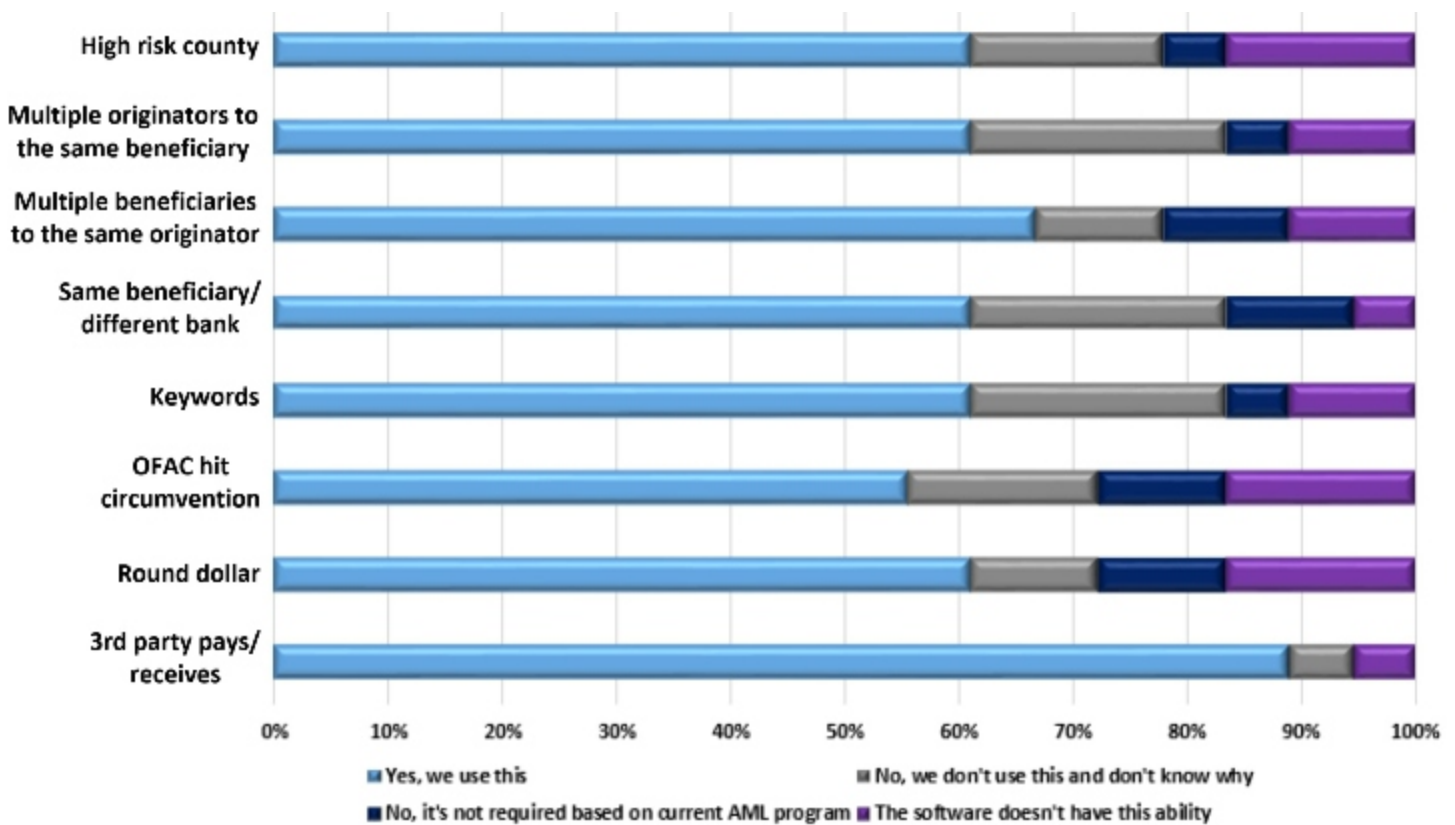
### *Software Training:*

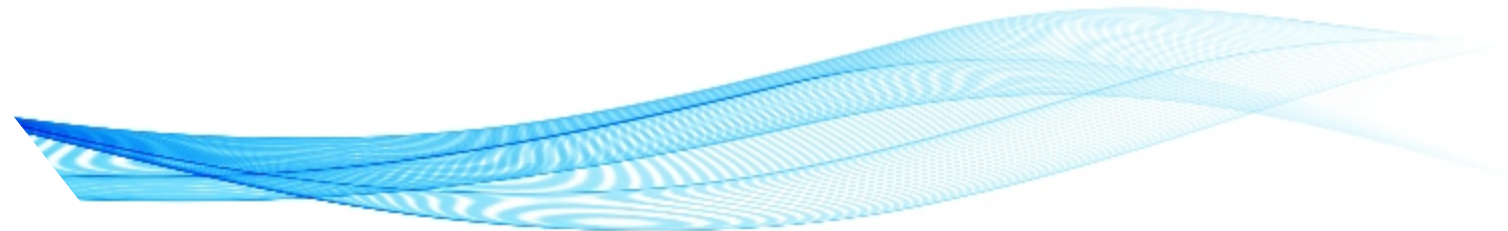
As we would have expected, the majority of commercial bank respondents participated in training provided by the BSA/transaction monitoring software vendor (88.9%).



## Rules - Wires:

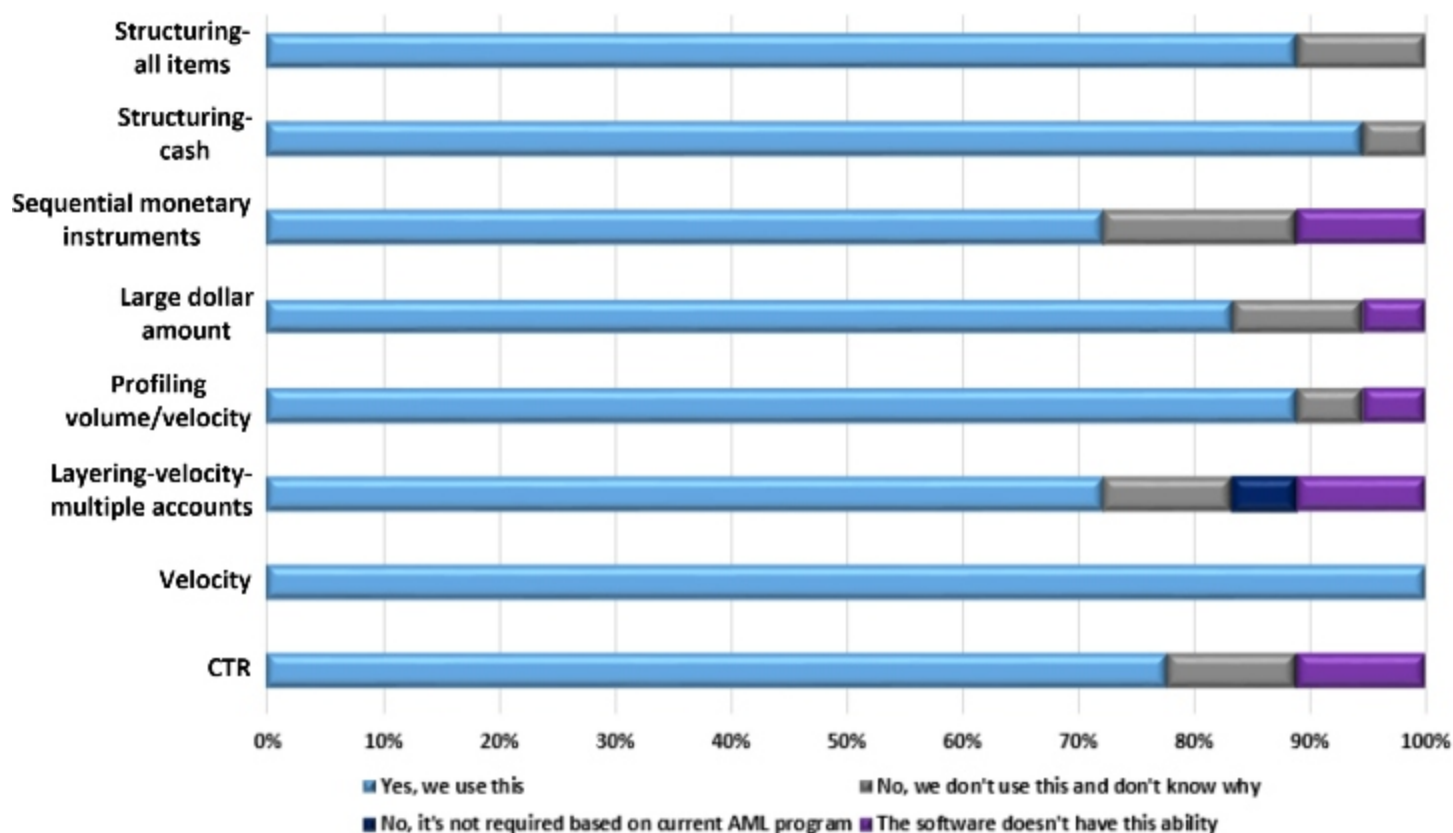
When considering what common wire rules our commercial bank respondents are using, the most common was a 'third party pays/receives' rule with nearly 90% using it. On the other hand of the spectrum the least common wire rule was an 'OFAC hit circumvention' rule with about 55% using that rule.

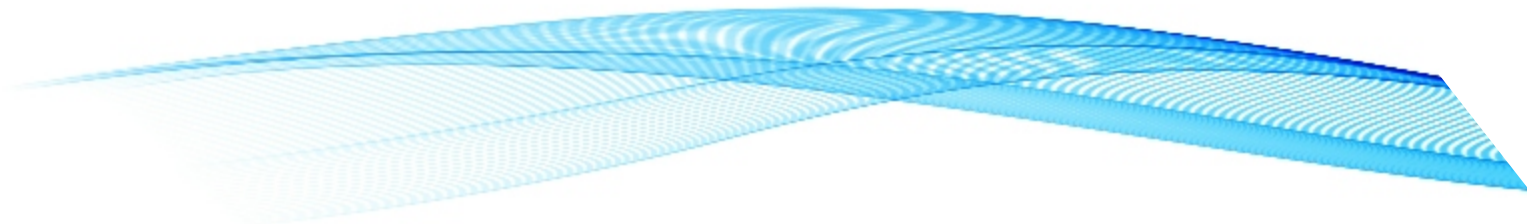




## Rules - Structuring:

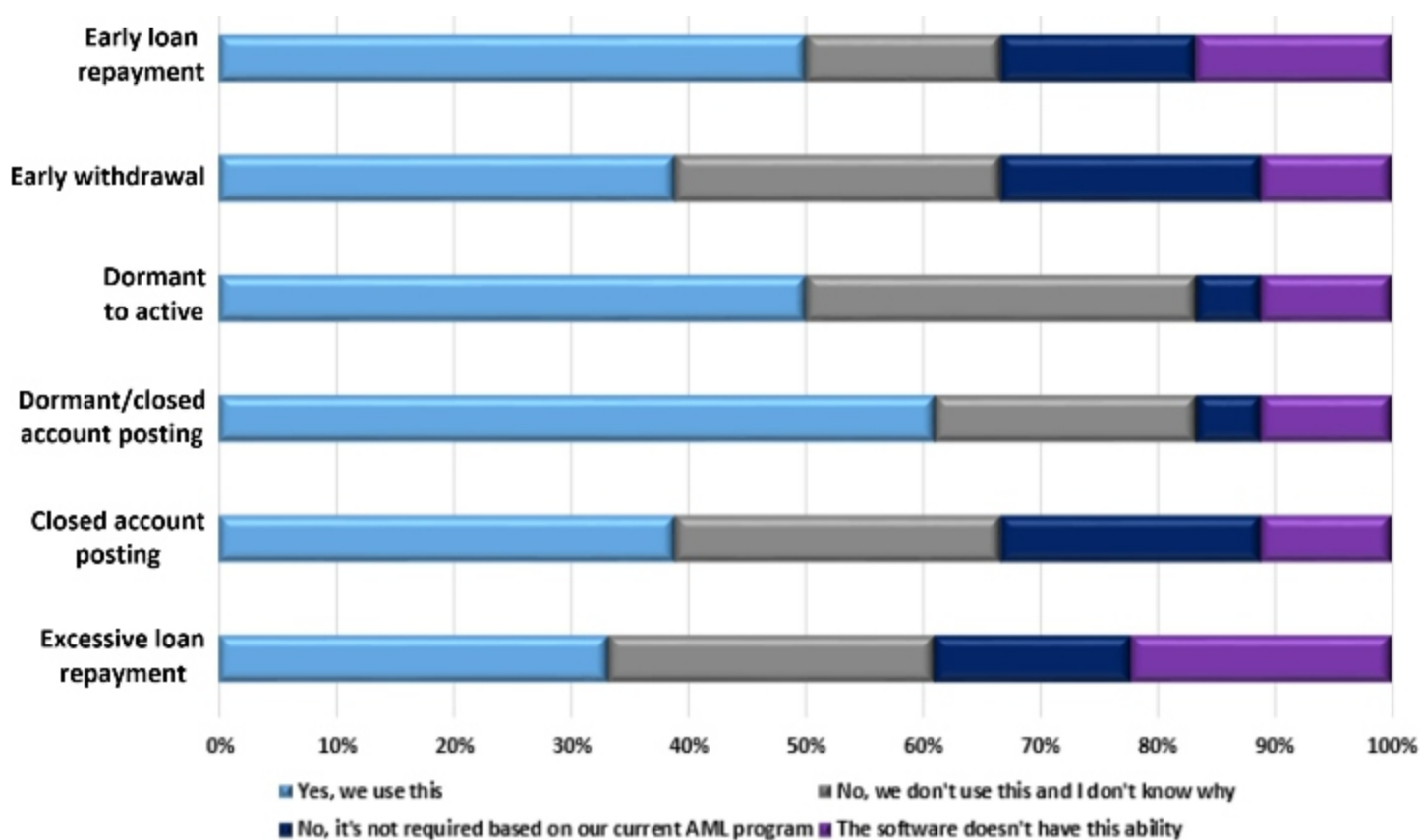
When considering a variety of other common rules, the most common rule for commercial bank respondents was a 'velocity' rule at 100% participation. The least common rule was for tied at just over 70% for 'sequential monetary instruments' and 'layering-velocity on multiple accounts'.





## Rules - Control:

Of control rules, commercial bank respondents most commonly use a 'dormant/closed account posting' rule with just over 60%. Meanwhile, the least common control rule was an 'excessive loan repayment' rule.

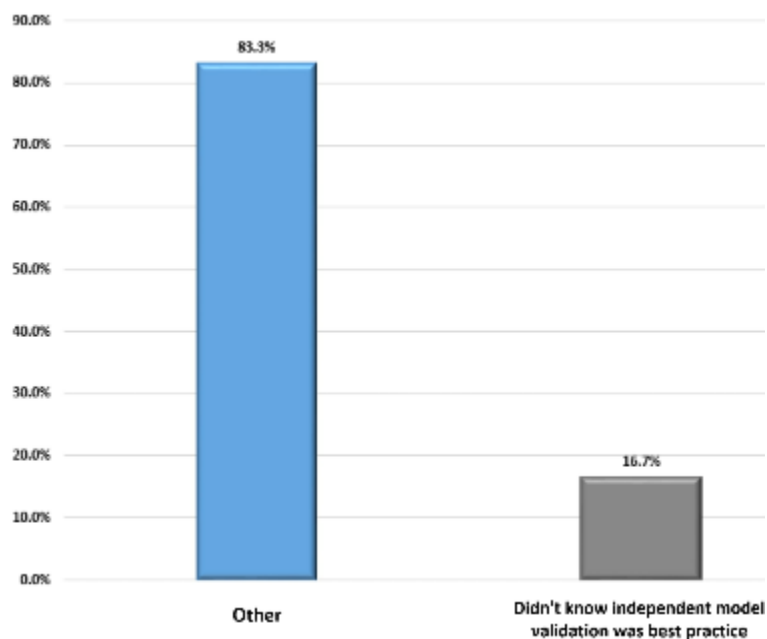
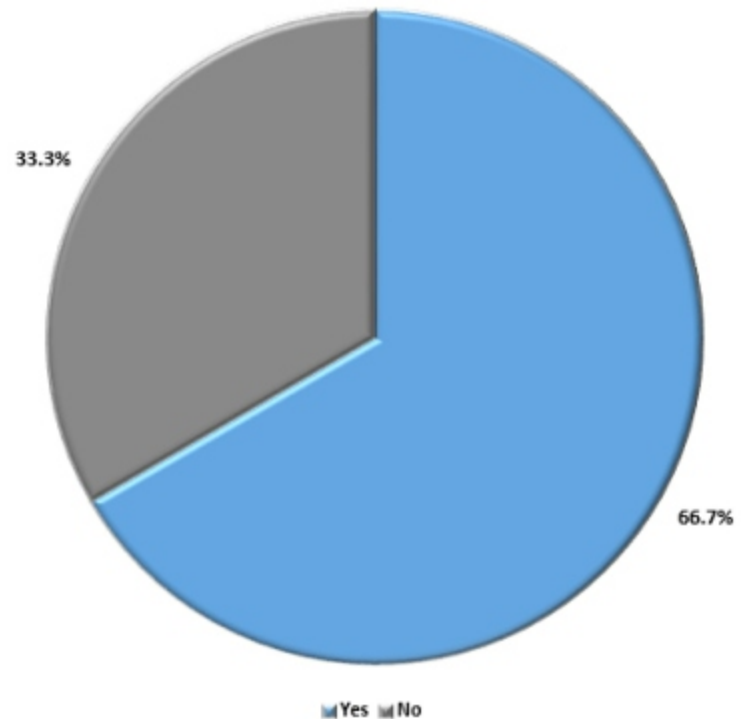




## Commercial Banks: BSA Software Post-Implementation Questions

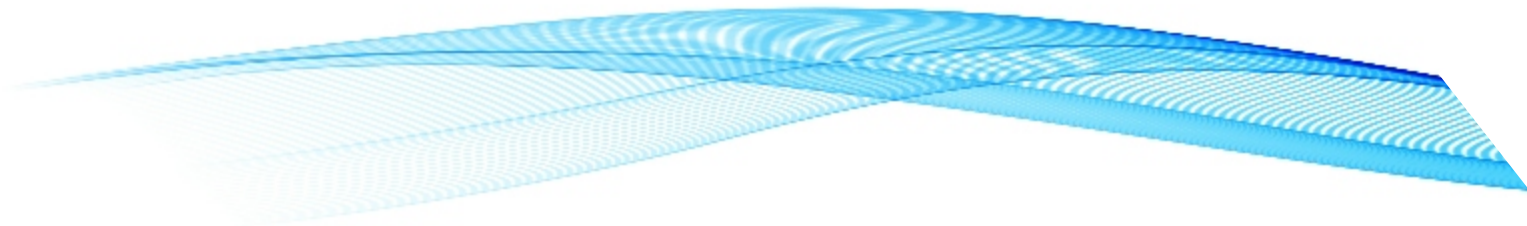
### *Conduct Independent Model Validation:*

As part of a the post-implementation process, 66.7% of commercial bank respondents conducted a model validation after implementing their BSA/transaction monitoring software.



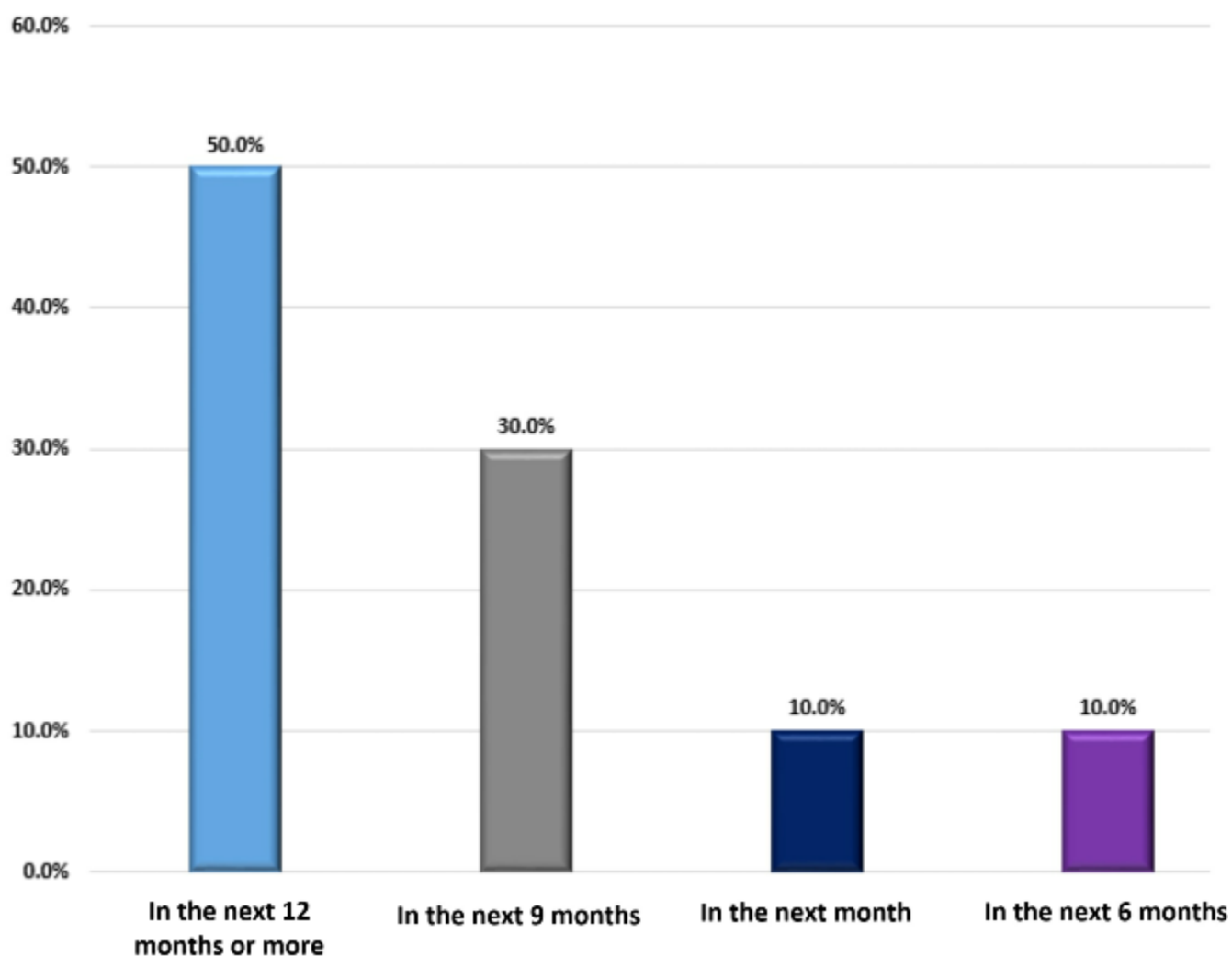
### *Did not Conduct:*

More than 80% of commercial bank respondents listed 'other' as the reason as to why they did not conduct a model validation after implementing their BSA/transaction monitoring software, while 16.7% said that they 'didn't know an independent model validation was best practice.'



### *Model Validation Timeframe:*

Half of our commercial bank respondents said that they would be conducting a model validation within the next 12 months on their newly implemented BSA/transaction monitoring software, with 30% planning one within nine months and 20% in the next three months.



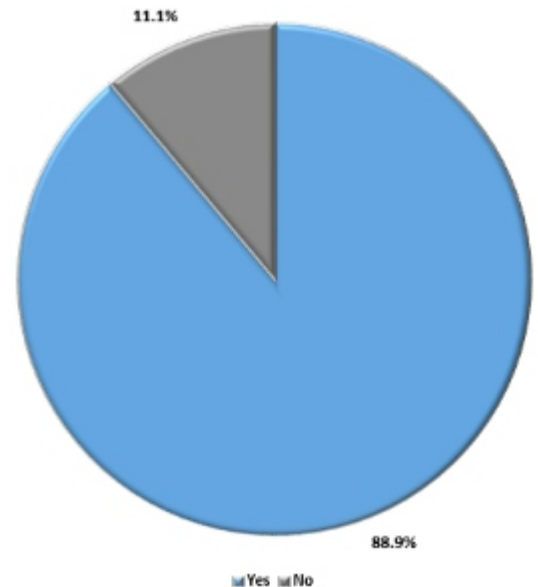




## Commercial Banks: BSA Software Features Questions

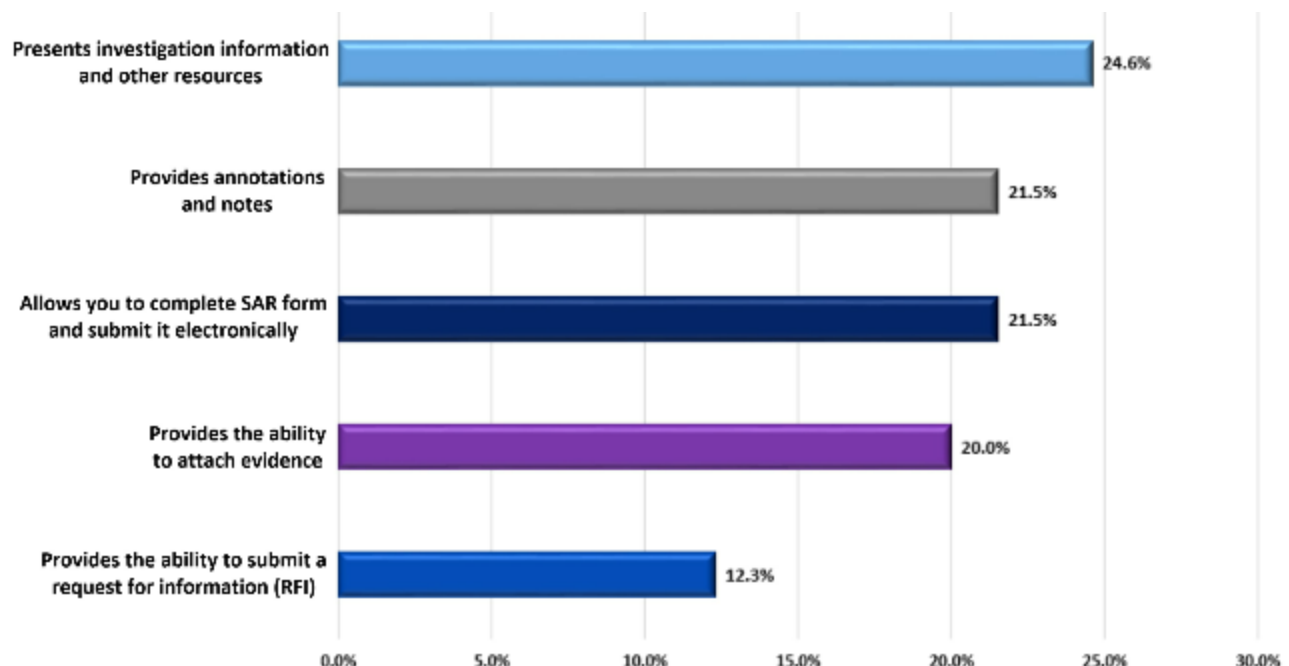
### *Alert/Case Management:*

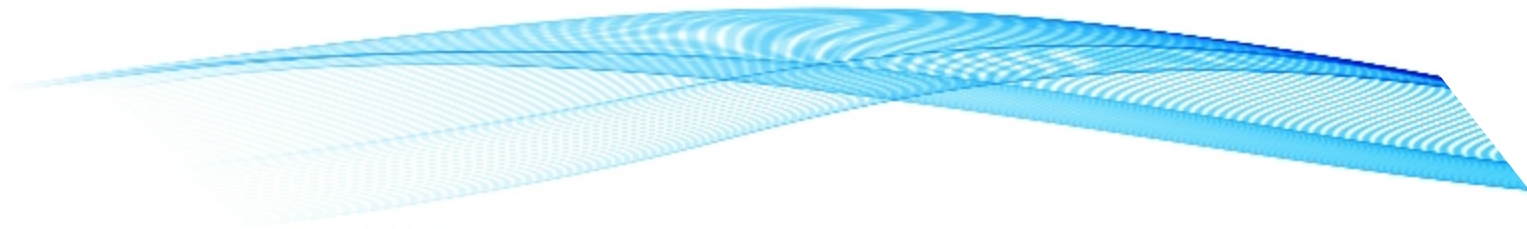
The vast majority of commercial bank respondents said that their BSA/transaction monitoring software does have an alert/case management function.



### *Additional Features:*

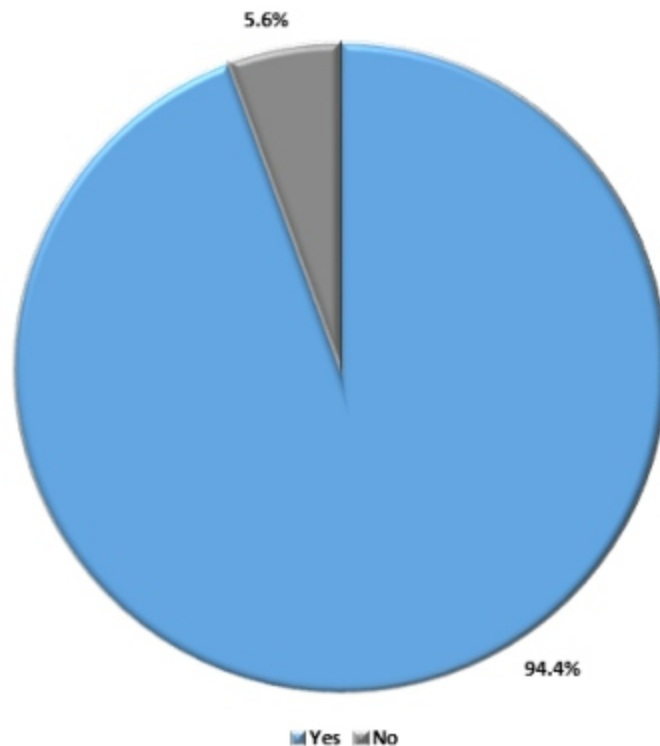
Further, commercial bank respondents said that their BSA/transaction monitoring software offers the following functionality in regards to the alert/case management process.





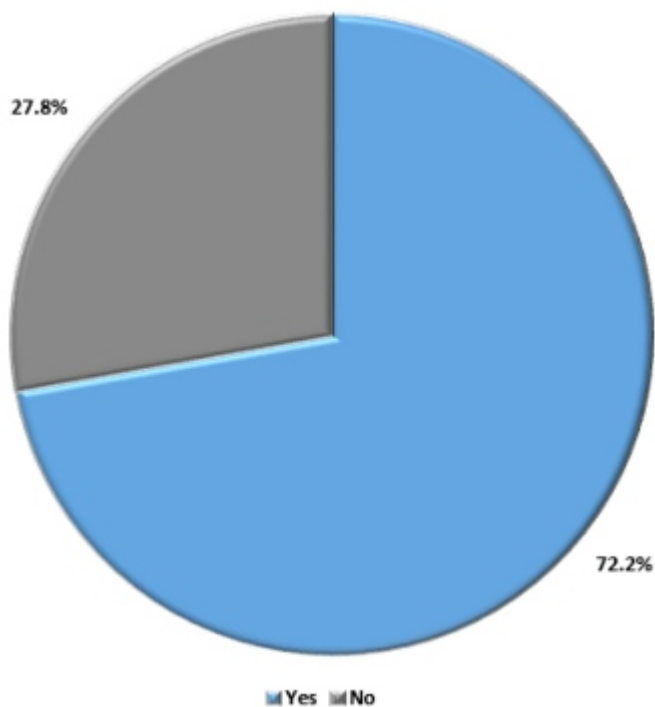
### *Dashboard:*

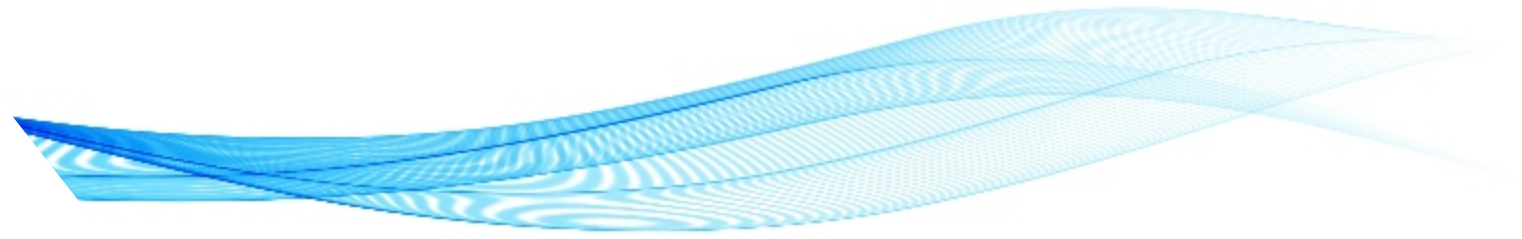
A resounding majority of commercial bank respondents (94.4%) said that their BSA/transaction monitoring software has a dashboard feature, which presents the data at a glance.



### *Dashboard - Link Select*

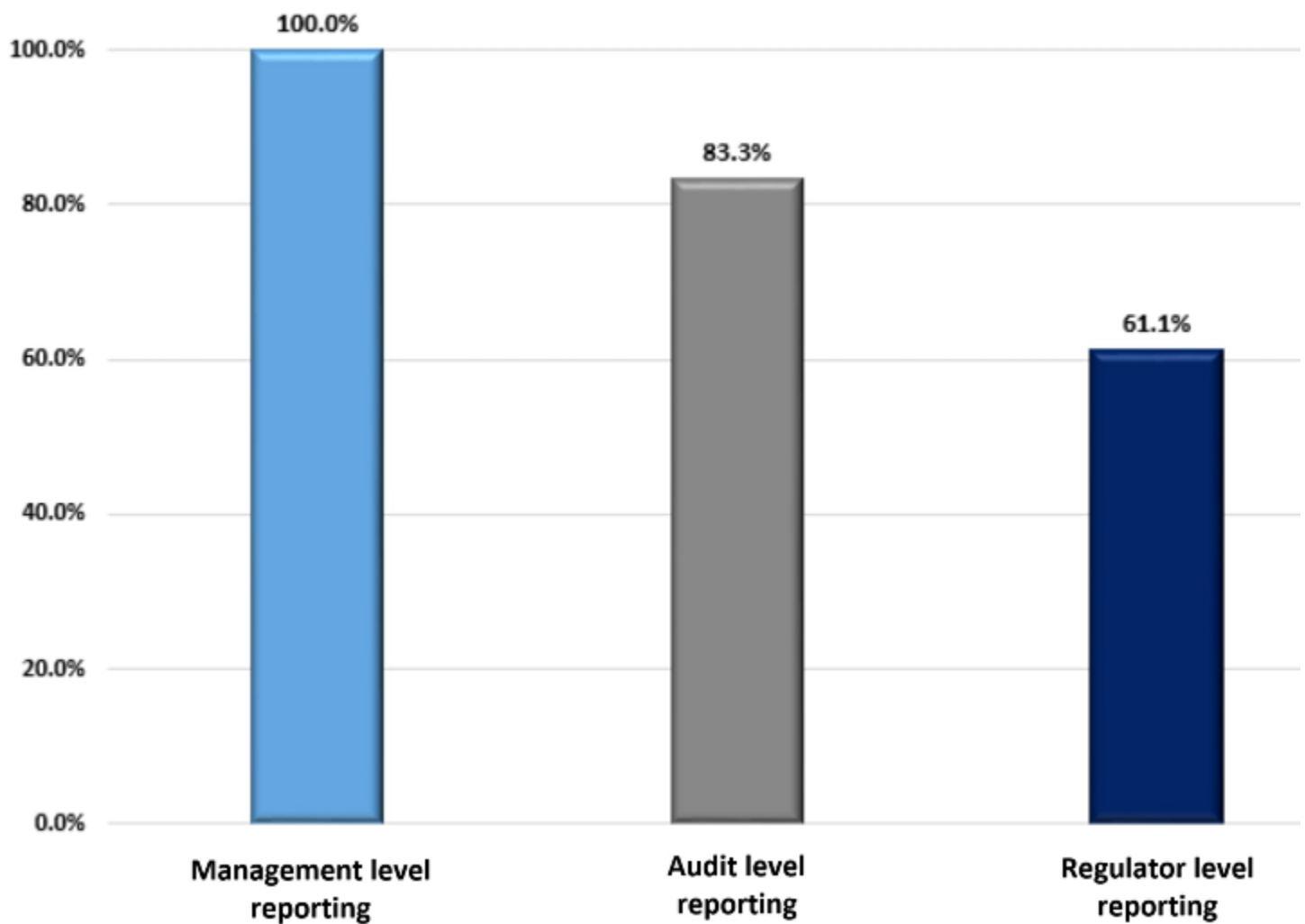
Of those who have a dashboard feature, just over 70% of those respondents say that their dashboard allows them to drill down further into the data.





### *Reporting:*

Finally, 100% of commercial bank respondents have at least management level reporting, with audit and regulator level reporting trailing slightly.





## Conclusion:

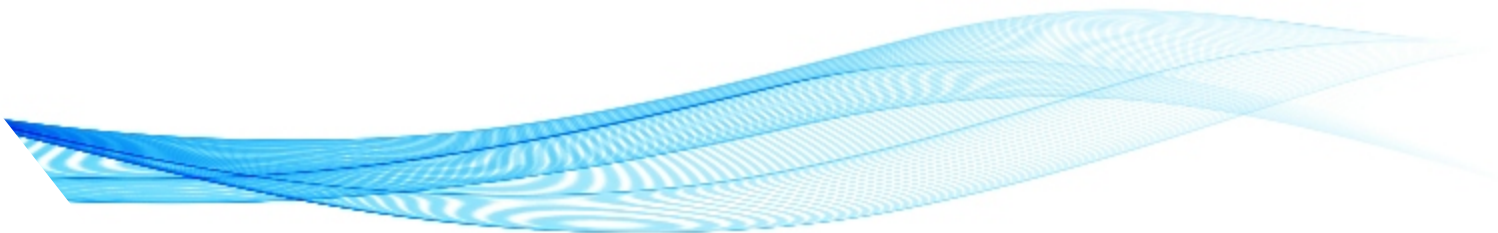
A robust AML program is strengthened by the technology that supports it, which can be a more manual process through excel spreadsheets, which still relies on technology, or BSA/transaction monitoring software. For this survey, we wanted to find out how our readership is monitoring transactions, and if they use software what its capable of doing.

The majority of our respondents represented compliance officers offering retail or commercial services at a community bank. With nearly a 50/50 split regarding asset size, the majority of represented banks over \$1 billion, and of those, the most comment response was \$1 to \$10 billion. When it came to their bank's overall risk rating, the majority rated themselves with a medium risk rating.

From the demographics, the first part of our survey was to find out if our participants were utilizing BSA/transaction monitoring software, which the majority are and less than 15% are not. To gain greater insight in to the group who are not, the majority are split between using 'spreadsheets' and 'spreadsheets and reviewing reports manually'. Finally, as expected, the majority of respondents are not using software for budgetary constraints.

For the majority of respondents that use a BSA/transaction monitoring software, most of them are spending more than \$50,000 a year or \$4,000 a month on that software and they're satisfied or very satisfied with their software's performance.

Next we moved in to more technical questions surrounding the BSA/transaction monitoring software our respondents are using. The majority said that they're software is hosted and that they have access to a test server with a complete and current replica of production. It's not surprising for a community bank to have a hosted system; however, it is surprising if the bank has assets up to \$10 billion. For example if an FI has an asset size of \$9 billion and their BSA/transaction monitoring software is hosted, they likely have the transaction volume to warrant a licensed system with access to a test server and testing environment so that they can make changes to their system, test them and then implement them once



they know they're working appropriately. The majority of our participants also said that their software is somewhat customizable, and operates in both real-time and batch processing. Finally, the majority also said that their software uses profiling as defined by comparing previous behavior to current behavior and alert you of abnormal activity.

When it comes to pre-implementation requirements, the majority have put together business requirement documents, conducted an RFP (request for proposal), on-going and updating status reports and put together a project plan. The majority also conducted testing as part of the implementation phase requirements including unit testing on each interface, an end-to-end system integration test and user acceptance testing (UAT). Not surprisingly nearly all respondents participated in software training provided by the vendor. We also asked our participants about the common rules they have implemented in their software - the most common rule is 'velocity' and the least common is 'early loan repayment'.

For post-implementation requirements the majority of our respondents have conducted a model validation on their BSA/transaction monitoring software as part of their overall BSA program. However, for those who haven't conducted a validation, the majority simply listed 'other' as to why they haven't.

The majority of our respondents said that their software has an alert/case management feature, provides a dashboard where the data can be drilled down into, and provides at minimum management level reporting. It also presents the investigation information, allows you to annotate and keep notes, attach evidence, complete the SAR (suspicious activity report) and submit it electronically and submit an RFI (request for information) via email, if necessary.

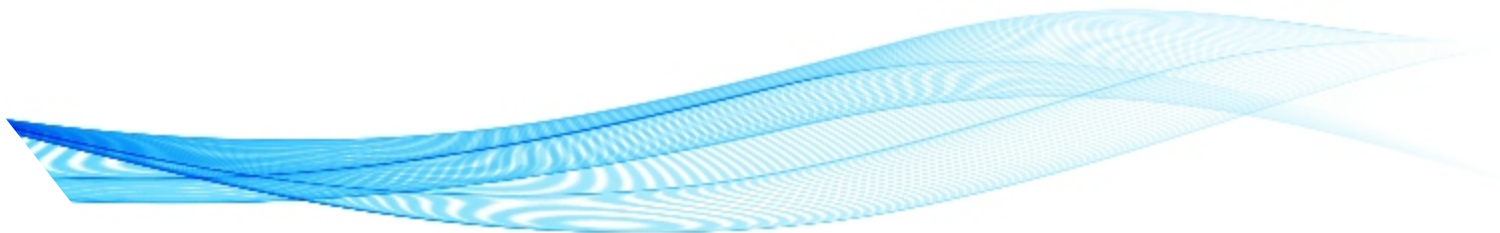
Overall, it's good to see that the majority of our respondents are satisfied with their software since it does help to strengthen and support their BSA program, and gives the industry an idea of what institutions have technically speaking and what they spend to achieve that. Our detailed results for retail and commercial banks would provide more specific details for those institution types. To receive a copy of the detailed results, visit <http://arcriskandcompliance.com/surveys.html>.



## Comparisons:

- Commercial banks represented community banks just slightly more than retail banks (41.9% and 38.9% respectively).
- Compliance Officers were more likely the representative from a commercial bank than a retail bank (47.4% and 39.1% respectively).
- When it came to the asset size of the institutions, retail banks were more likely to be over \$1 billion (52%) vs. commercial banks that were more often under \$1 billion (55%).
- Both retail banks than commercial banks said that their overall risk rating as of medium risk (56% and 57% respectively).
- More retail banks than commercial banks have BSA/transaction monitoring software (92% and 85.7% respectively).
- For the institutions that do not have a software, retail banks had a 50/50 split between 'spreadsheets' and both 'spreadsheets and reviewing reports manually'; whereas commercial banks use both 'spreadsheets and reviewing reports manually' more often than spreadsheets alone (66.7% and 33.3% respectively). The same split was present when asked why they didn't have software - retail banks 50/50 with 'budgetary constraints' and 'exempt' and a 66.7%/33.3% split of the same for commercial banks.
- More commercial banks than retail banks spend \$50,000 or more on their BSA/transaction monitoring software (44.4% and 34.8% respectively).
- Retail banks seemed to be less satisfied with their software, 26.1% responding negatively compared to 16.7% for commercial banks
- While the split is similar between hosted or licensed BSA/transaction monitoring software, commercial banks use hosted software just slightly more than retail banks (55.6% and 52.2% respectively).





- Retail banks tended to have less customizable software available to them. 21.7% of retail banks said their software isn't customizable at all, compared to commercial banks where only 11.1% said their software wasn't customizable.
- Like hosted versus licensed solutions the split is similar for those who have access to a test server with commercial banks saying they have access to a test server 55.6% of the time and retail banks say that 47.8% of the time. Interestingly the same percent that say they host their software also say that they have access to a test server. This is contradictory to our experience, and for those who don't have a test server puts them at risk of not being compliant. Without a test server they cannot test changes in their system before putting them into production, so it skips the verification and validation stage of testing.
- More commercial banks say their BSA/transaction monitoring software uses profiling as defined by comparing previous behavior to current behavior and alerting you to abnormal activity.
- When it comes to how their BSA/transaction monitoring software processes the data, no commercial banks are using real-time processing only but instead the majority of both retail and commercial banks are using 'both' batch and real-time processing (56.5% and 55.6% respectively).
- Retail banks were more likely to set up their Business Requirements Document and other pre-implementation tasks compared to commercial banks.
- As an implementation task retail banks prioritize unit testing on each interface, while commercial banks tend to prioritize an end to end system integration test.
- The majority of both retail and commercial banks say they participated in training by their BSA/transaction monitoring software vendor (93.1% and 88.9% respectively).





## Comparisons Continued:

- A similar percent of retail and commercial banks conducted a model validation after implementing their BSA/transaction monitoring software (60.9% and 66.7% respectively); however, more commercial banks (83.3%) than retail banks (66.7%) listed 'other' as the reason they did not conduct one. Similarly, around half of both commercial and retail banks plan to conduct one in the next 12 months with the other half planning to conduct one in the next 9 months. In summary, there were definitely similarities in comparing these bank types (retail and commercial) but there were some stand out comparisons; like the fact that commercial banks on average require or attract CA's with higher education requirements but also on average pay them higher than industry standard.
- A very close number of respondents of both commercial and retail say that their BSA/transaction monitoring software has alert/case management and the functionality of that software is very similar (see page 23 and 45 of this report for more details on each).
- When it came to additional features of the software the majority of both retail and commercial bank respondents say that they have a dashboard (91.3% and 94.4% respectively) and that allows them to drill down further into the data (81% and 72.2% respectively).
- Finally and similarly, both retail and commercial banks say their BSA/transaction monitoring software provides a minimum level of reporting for management and less than half for both say it offers audit and regulator level reporting.

In summary, the majority of both retail and commercial banks have BSA/transaction monitoring software and they're quite satisfied with it. That's a good thing since software vendors have had time to work on and tweak their tools providing better products to help BSA compliance officers, as many of our respondents were. The greatest learning for us was the percentage of those who do and don't have access to a test server, and what's most concerning is that a test server provides an FI the ability to test changes in their environment without affecting production. Without a test server and the ability to effectively make changes could put these institutions at risk.

## About AML-ology

AML-ology is the study of AML (anti-money laundering) trends and solutions by providing newsletters and survey reports to AML dedicated professionals. A monthly newsletter is sent with a scientific or academic approach to an AML hot topic. A survey is conducted each quarter based on the hot topics being discussed in by the AML community. To sign up to receive the AML-ology newsletter or survey, please visit [here](#).

We provide this report as a value-add to the compliance community to better the anti-money laundering community as a whole. Thank you to everyone who participated. We hope you will participate in future surveys as well.

## About ARC Risk and Compliance

ARC Risk and Compliance ([www.arcriskandcompliance.com](http://www.arcriskandcompliance.com)) is a solution provider for anti-money laundering (AML) technology and compliance consulting. We found our start within the anti-money laundering (AML) technology consulting space, but we quickly found that wasn't enough. After visiting a number of organizations, the largest piece of the puzzle that was missing was the bridge between compliance and technology.

Today, we are a leading AML technology and compliance specialized company, offering our specialization in BSA, OFAC, CDD/KYC, and 314(a). Since we focused our energy, we have the privileged ability to speak compliance with the compliance officers and technology with the IT team. That gives us a unique skill set that gives you the best experience in one place.

Many of ARC Risk and Compliance employees and consultants were leaders in designing, developing and deploying the leading software vendors of today: Actimize, eGIFTs, Global Vision, Norkom, Prime Compliance Suite, and so on. Our SME team has a strong compliance background that can assist Banks with regulatory citations and other types of compliance matters.

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*"The AML Specialists"*