

BSA/AML REGULATORY REQUIREMENTS

	DEVELOP AND IMPLEMENT BSA/AML COMPLIANCE PROGRAM	COLLECT AND VERIFY CUSTOMER IDENTIFICATION	MAINTAIN TRANSACTIONAL RECORDS	MONITOR AND REPORT SUSPICIOUS ACTIVITY
BANK	YES	YES	YES	YES
PROVIDER OF PREPAID – party that provides principal oversight and control over the “covered ¹ ” prepaid program. A Bank can not be a Provider of Prepaid.	YES for “covered” arrangements/devices (footnote 1)	YES for “covered” arrangements/devices (footnote 1)	YES for “covered” arrangements/devices (footnote 1)	YES for “covered” arrangements/devices (footnote 1)
SELLER OF PREPAID ACCESS² – point of sale for consumer to acquire initial loading or subsequent loading to a prepaid access device.	YES for “covered” arrangements/devices (footnote 1) and criteria outlined in footnote 2	YES for “covered” arrangements/devices (footnote 1) and criteria outlined in footnote 2	YES for “covered” arrangements/devices (footnote 1) and criteria outlined in footnote 2	YES for “covered” arrangements/devices (footnote 1) and criteria outlined in footnote 2
OPERATOR OF A CREDIT CARD SYSTEM – Prepaid access is processed utilizing a Network provider. (Examples: <i>Visa, Master Card, Discover, American Express</i>)	YES	NO	NO	NO

¹ The following types of prepaid access arrangements/devices are “covered” by the BSA, requiring the “Providers” and “Sellers” of these products to comply with the regulations: 1) Closed Loop greater than \$2,000 maximum value on any day; 2) Open Loop greater than \$1,000 maximum value on any day; 3) Open Loop with international capabilities, no minimum; 4) Open Loop with person to person capabilities, no minimum; 5) Open loop with non-depository loads, no minimum.

² A person is considered a “seller of prepaid access” if they either sell “covered” (see footnote 1) prepaid access arrangements/devices that can be used before verification of customer identification; or they provide prepaid access greater than \$10,000 to any person during any day and have not implemented policies to prevent such a sale.