

Sample Risk Assessment	
Products	Points
Residential Conventional	
Residential ARM	
Reverse Mortgage	
HELOCs	
Customers	
US Citizen	
Non US Citizen	
Professional Service Providers (attorneys, accountants, doctors, R/E brokers)	
Cash Intensive providers	
Geographic Location	
High Intensity Drug Trafficking Area	
High Intensity Financial Crimes Area	
Other Considerations	
Form 8300 filed	
SAR filed	
OFAC match	

KEY: One Risk Assessment for the Company profile. You may also complete the risk assessment per loan.

KEY: Products that are more risky should have the most points.

KEY: Customers who are non-citizens, in a professional service or in a cash intensive business may be more risky than other customers.

KEY: Property located in these areas may pose a higher risk. Note: Hawaii is a HIDTA

KEY: other items to consider in determining whether your lending profile may be high risk

Total	
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KEY: You need to decide how many points would make your company profile High Risk, Medium Risk or Low Risk. Then your BSA/AML policy should reflect this risk assessment and how you will mitigate/accept the risks.