

# Bank Protection Act Program

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## EXAMINATION OBJECTIVES

Determine whether the association has a security program and has provided for appropriate security devices and procedures in accordance with minimum regulatory requirements.

Determine whether known or suspected criminal violations have been identified and properly reported.

## EXAMINATION PROCEDURES

1. Review the Matters Requiring Board Attention and Corrective Actions from the three or four previous ROEs to ensure that the board and management have taken appropriate corrective action where necessary and persistent problems have not recurred.

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2. Review the association's security program:

- Ascertain whether its contents are in compliance with the requirements of 12 CFR § 568.3(a);
- Verify that the installation and maintenance of the security devices satisfy the requirements of 12 CFR § 568.3(b); and
- Determine whether the program is revised as appropriate to reflect changes in circumstances, e.g., the addition of a new facility, changes made to a facility, employee turnover, increased cash exposure, the responsiveness of law enforcement agencies, technological advances in security devices, etc.

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3. Interview management and staff to ascertain if association personnel have adequate knowledge of policies and sufficient training to implement procedures.
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4. Determine whether the security officer reports at least annually to the board of directors on the implementation, administration, and effectiveness of the security program.  

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5. Review security reports and records to ascertain whether criminal or suspected criminal violations have been reported to the proper authorities. Determine if the Suspicious Activity Report has been prepared where appropriate, and filed on a timely basis.  

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6. Determine the impact of criminal violations on the association and whether controls have been established to insure against the possibility of further violations.  

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## **EXAMINER'S SUMMARY, RECOMMENDATIONS, AND COMMENTS**

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