

6 Simple Questions: Rate Your Compliance Culture

A strong culture of compliance is an important signal to regulators that your institution prioritizes compliance. Evaluate your institution's compliance culture with the following six simple questions. This self-assessment is derived from information released by FinCEN. Scoring is below.

5=EXCELLENT, 4=ABOVE AVERAGE, 3=AVERAGE, 2=BELOW AVERAGE, 1=POOR, 0=INCOMPLETE

1. Does leadership actively support and understand compliance efforts?

Leadership is responsible for being familiar with the institution's compliance responsibilities, and should support compliance initiatives. This support should be evident to others in the organization.

CIRCLE SCORE: 5 / 4 / 3 / 2 / 1 / 0

2. Are efforts to manage compliance deficiencies and risk independent of revenue interests?

Compliance should have sufficient authority and autonomy to implement a successful compliance management program. Concerns about revenue should not outweigh compliance concerns.

CIRCLE SCORE: 5 / 4 / 3 / 2 / 1 / 0

3. Does the compliance team have access to relevant information from all departments?

Compliance should have access to relevant information and documents required to comply with regulatory compliance regulations. Channels of communication between departments should be open.

CIRCLE SCORE: 5 / 4 / 3 / 2 / 1 / 0

4. Are adequate resources devoted to the compliance department?

Based on the organization's size and complexity, financial institutions should be prepared to adjust resources to reasonably manage policies, procedures, reporting, risk assessments, due diligence, etc.

CIRCLE SCORE: 5 / 4 / 3 / 2 / 1 / 0

5. Is compliance tested by an independent and competent party?

Independent testing of a compliance program (internal or external) will help safeguard the integrity of the compliance program and help identify corrective actions to address deficiencies.

CIRCLE SCORE: 5 / 4 / 3 / 2 / 1 / 0

6. Do leadership and staff appreciate the purpose of compliance efforts, and how to use reporting on various regulatory compliance areas?

Reporting and transparency in financial institutions provides the optics necessary to determine compliance with regulatory regulations.

CIRCLE SCORE: 5 / 4 / 3 / 2 / 1 / 0

YOUR PROGRAM'S TOTAL COMPLIANCE CULTURE SCORE: _____

20-25 points: Nice job! There may be just a few places to review and improve your culture.

13-19 points: Weaknesses likely exist. Consider taking steps to improve your institution's compliance culture this year.

0-12 points: Serious deficiencies may exist. Based on your score, your institution's culture of compliance may not be robust, and could result in compliance risk. Consider getting input from management. Help them develop a proactive "compliance voice."

>> Looking for a more in-depth assessment of your institution's compliance policies and programs? No problem. **Contact TRUPOINT Partners today!**

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