Compliance Audit IV:
General Operations Emphasis

Triac Compliance LLC

Schedule

This review may be conducted at any point during the year.

Area(s) of Review

This review emphasizes the following operations regulations, as applicable:

- *Interest on Deposits ("IOD")*
- *Expedited Funds Availability—Regulation CC, as amended, and applicable California and Nevada law ("EFAA")*
- *Truth in Savings—Regulation DD ("TISA")*
- *Right to Financial Privacy*
- *Electronic Fund Transfers—Regulation E ("EFTA"), including the overdraft opt-in rule, the Prepaid Account Rule, and the Remittance Transfer Rule*
- *Identity Theft Prevention / Red Flags Rule*

Scope of Review

The scope of the review is modified to meet the needs of each client. Typically, however, it includes the following:

- Review of applicable operations policies (with the exception of the Bank Secrecy Act policy/program—covered in Compliance Audit II).
- Review and evaluation of operations training.
- Review of blank disclosures applicable to operations compliance.
- Review of all operations advertisements over the past six months for TISA and membership compliance.
- Review of all previous audits (including internal certifications/reviews) conducted involving designated operations regulations over the past year and the bank's response to the findings.
- Review of operations lobby disclosures/posters for accuracy and completeness.
- For Expedited Funds Availability, a sampling review of holds placed by the bank for accuracy and timeliness in removal of hold and computation of interest, confirmed against current Regulation CC dollar thresholds (as most recently amended effective July 1, 2025). Also evaluate the bank's compliance in providing disclosures when opening accounts and at required locations.
- For Electronic Funds Transfer, review access device issuance, the required disclosures (e.g., ATM receipts, periodic statements, preauthorized transfer disclosures), the bank's handling of billing errors over the past six months, and compliance with the overdraft opt-in rule, the Prepaid Account Rule, and the Remittance Transfer Rule.
- For Interest on Deposits, evaluate the bank's system of providing necessary disclosures for Negotiable Order of Withdrawal ("NOW") accounts and of ensuring compliance to transaction limitations for savings accounts.
- For Truth in Savings, evaluate sampling of periodic statements for accuracy, subsequent disclosures for timeliness and completion, and the accuracy of interest computations in conjunction with EFAA and IOD.
- For Right to Financial Privacy compliance, evaluate handling of applicable government requests.
- For Identity Theft Prevention, evaluate the bank's Red Flags Rule program, including its written identity theft prevention program and staff training.
- Review for applicable California and Nevada operations law requirements.

Proposal

Depending on the needs of the institution, this review typically requires two to four days.
For a specific fee proposal for your institution, please contact Frank Young at 702.217.7566 or fyoung@triaccompliance.com.

Services for financial institutions since 2005.

Triac Compliance LLC
1489 W. Warm Springs Rd.
Suite 110
Henderson, NV, 89014

Office: 702.990.0133
info@triaccompliance.com
www.triaccompliance.com

TRIAC COMPLIANCE L.L.C.
THE TRIAC DIFFERENCE