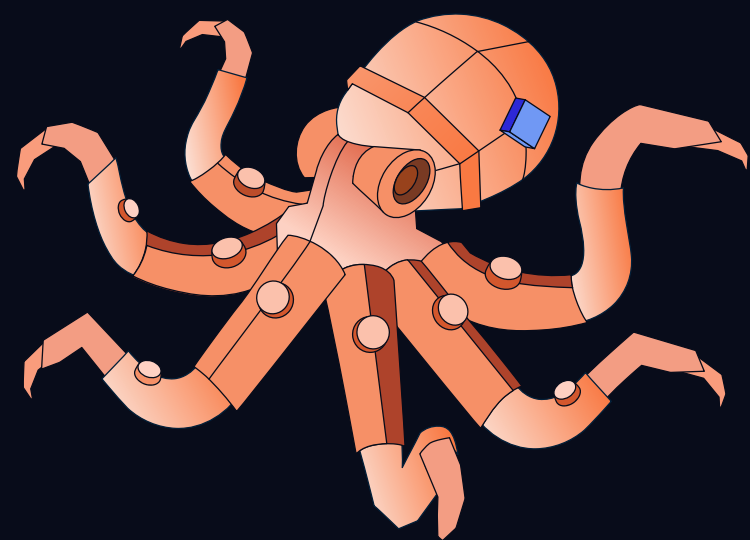


10 tests to check whether your AML monitoring has drifted



A recent \$1.2 billion enforcement action named failures that can live in any monitoring program. These 10 tests help you find yours.

RATING		WHAT IT MEANS	
Pass		You ran the test, you have the evidence, and a stranger could repeat it and get your answer.	
Gap		You ran it and found a problem.	
Don't know		You haven't run it. Count it as a Gap until you do.	

#	TEST	HOW TO RUN IT	A PASS LOOKS LIKE
1	Last tuning date	Pull the date each monitoring risk weight last changed	Every weight reviewed in the past 12 months, with a written reason
2	Direction of change	Count increases and decreases across your last two tuning rounds	Every decrease has evidence behind it
3	Threshold reason	Find the written reason for your alert threshold	One page showing the data behind the number and who approved it, not just headcount
4	Automation share	Calculate the share of cases created or closed by automatic rules	You know the number, sampled it last quarter, and no single rule drives most cases

#	TEST	HOW TO RUN IT	A PASS LOOKS LIKE
5	Suppression rules	List every rule that lowers or hides an alert	Each was tested before launch and retested since
6	Below-the-line sample	Hand-review a sample of activity that fell under your threshold	Done in the past 12 months, and what you found fed back into tuning
7	Filing speed	Pull the days from alert to SAR filing for your last 20 SARs	Every one met the filing deadline in the SAR rule, and late ones have a documented cause
8*	Profile versus reality	For your 20 biggest customers by wire volume, compare expected activity on file to the last 12 months	Gaps beyond your set tolerance triggered a documented review
9	Where findings go	Take your last three audit or testing findings	Each has an owner, a due date and proof it closed
10	Foreign correspondent files	Pull the files for accounts held for foreign financial institutions	Each has a current risk assessment and a stated reason for its activity level

***For test 8**, use this as your yardstick: a customer expected to sell \$1 million to \$4 million that receives hundreds of millions in wires should never sit quietly in a queue.

Source: Tests are based on failures named in the FinCEN consent order announced October 13, 2026. See the [FinCEN press release](#) and the [OCC news release 2026-89](#).

For informational purposes only. Not legal advice. The order binds only the institution named in it. These tests are a self-assessment aid, not a regulatory standard.



Read the full walkthrough
on the Sardine blog [here](#)

