

Payment Systems Risk Questionnaire

| | Yes | No | | Yes | No |
|---|-----|----|---|-----|----|
| General Questionnaire | | | 9. Based on the results of the overall examination, does the daylight overdraft activity within the de minimis cap present undue risk? | | |
| This questionnaire addresses the de minimis cap procedures and the review of the self-assessment file and board of directors' minutes. Separately, the regulator should review considerations outlined in EDP Handbook Section 10, Electronic Funds Transfer Systems (EFTS), regarding funds transfer risk. | | | <i>Review of the Self-Assessment File</i> | | |
| <i>De Minimis Cap Procedures</i> | | | 1. Does the file contain adequate documentation addressing all components of the self-assessment? | | |
| 1. Do the board of directors' minutes reflect consideration of the Federal Reserve's PSR policy statement and its implications for the institution? | | | 2. Does the file indicate annual updates of the self-assessment and reports submitted to the board of directors detailing those updates? | | |
| 2. Did the board of directors approve a de minimis cap on the institution's funds transfer activity? | | | <i>Review of the Board of Directors' Minutes</i> | | |
| 3. Has the board of directors submitted a copy of the certification of the de minimis cap to its Federal Reserve Bank within the past 12 months? | | | 1. Do board minutes reflect adequate consideration by the directorate of the self-assessment requirements at least annually? | | |
| 4. Can the institution monitor its payment activity for daylight overdrafts? | | | 2. Do board minutes reflect consideration of correspondence or counseling efforts by the Federal Reserve or other supervisory agency? | | |
| 5. Are controls in place to keep the institution from exceeding its net debit cap? | | | 3. Does the board resolution formally establishing the institution's cap identify the following: | | |
| 6. Are the controls effective? | | | <ul style="list-style-type: none"> • The rating for each of the three separate rating components? • The institution's overall rating? | | |
| 7. Does the institution use daylight overdrafts only on an occasional basis? | | | | | |
| 8. If the institution consistently incurs daylight overdrafts, has the board of directors considered implementing a self-assessment review? | | | | | |

Comments

Exam Date: _____
 Prepared By: _____
 Reviewed By: _____
 Docket #: _____