

Table of Contents

Introduction.....	6
Summary Overview.....	7
Section One.....	9
Risk Management Policy.....	12
Section Two.....	33
Customer Application (Commercial).....	34
Section Three.....	49
Customer Audit, Site Visit and Self Assessment Policy and Procedures.....	50
Section Four.....	63
Customer Agreement (Commercial).....	64
Section Five.....	89
Customer Implementation Plan (Commercial).....	90
Section Six.....	99
Compliance Review and Audit Plan (Organization).....	100
Section Seven.....	143
Customer Agreement (Consumer).....	144
Using the Forms	
Appendix	
I. Check Processing in the 21 st Century Act (Check 21).....	164
II. The FFIEC Guidance on the Risk Management of Remote Deposit Capture (Issue date 1-14-09).....	189