An International Job Task Analysis of the “Anti-Money Laundering Specialist”

A research project conducted by the Association of Certified Anti-Money Laundering Specialists as the basis for its certification examination

Prepared by Robert C. Shaw, PhD
Applied Measurement Professional, Inc.
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EXECUTIVE SUMMARY

Background

The Association of Certified Anti-Money Laundering Specialists (ACAMS) was inaugurated in February 2002 to advance the profession of anti-money laundering (AML) specialists through the development of a certification program. The granting of the Certified Anti-Money Laundering Specialist (CAMS) status recognizes professional and academic achievement through the individual’s participation in this voluntary certification program. The first examination will be administered in March 2003.

The commitment of ACAMS to advance the profession is reflected in its mission statement:

The Association’s mission statement is to advance the professional knowledge, skills and experience of those dedicated to the detection and prevention of international money laundering, and to promote the development and implementation of sound anti-money laundering policies and procedures.

Objective of the study

ACAMS undertook this international Job Task Analysis (JTA) of the AML profession to identify the responsibilities of professionals who are working in the AML field around the world. A JTA, which can also be described as a practice analysis or role delineation study, is used to describe the validation procedure for certification examinations, and integral part of the development of the Association’s practice-related certification examination program.

ACAMS requested the services of Applied Measurement Professional, Inc. (AMP), an independent test development company, to design and conduct a study to support development of specifications which a content valid international certification examination could be built.

Methodology

Because it was important for this study to capture core dimensions of anti-money laundering specialty practice that cut across specialty areas and geography, an Advisory Committee (AC) was formed to represent diverse regions and specialty areas. These subject matter experts were intimately familiar with job duties of anti-money laundering specialists. The Committee supervised the study, and made decisions regarding the gathering and analysis of data. AC members represented varying practice sites in the United States, United Kingdom, and Switzerland.

The study was conducted in several phases including survey development, distribution, and response analyses:
Step 1: Survey Development: First, the AC collaboratively defined the professional in the AML field as:

“AML specialists recognize and help identify money laundering risks and methods in different roles (e.g. Compliance Officer, Regulator, Law Enforcement Officer, Prosecutor). Specialists appreciate the international environment in which they operate and are familiar with varied anti-money laundering standards among nations. Specialists are charged to design and maintain effective compliance programs for institutions in which they work. Specialists are, or interface with, financial investigators and conduct, or actively support investigation processes.”

The Committee then identified four major content areas under which 59 tasks applicable to the AML professional were categorized into subcategories. The major content areas were as follows:

I. Money Laundering Risks and Methods
II. International Standards of Money Laundering Compliance
III. Anti-Money Laundering Program
IV. Conducting or Supporting the Investigation Process

Step 2: Distribution: The web-based survey that included the 59 identified tasks, and background questions, was sent out to more than 700 AML professionals worldwide, to solicit judgments that combine the importance of each task with the frequency with which it is performed.

Step 3: Response Analysis: After response analyses, the AC created decision rules by which tasks were classified as critical or uncritical for competent performance of an anti-money laundering specialist. Only the tasks that were validated by the respondents remained on the detailed content outline (test specifications) that serves as a basis for the Certification Examination of the Association.

Response and background of respondents

A total of 134 people responded from 17 countries. The response rate to the survey was 21.6%, which is typical for an unsolicited survey and adequate for conducting a relevant and reliable Job Task Analysis.

About one-half of survey respondents came from the United States. Twenty-one states were represented. The other half of survey respondents came from sixteen countries outside the United States, including China, Jordan, Cayman Islands, Peru and Switzerland.

Survey respondents came from institutions of sizes varying from one-half million dollars in assets to nearly 700 billion dollars in assets.
Survey respondents typically had 5-9 years of experience specializing in anti-money laundering:

A complete demographic analysis of the respondents, including data on primary job function, institution type, geographic location, proportion of AML responsibilities, highest
level of formal education, primary study area in university, industry, and primary language, is graphically presented in the full report.

**Results**

Questions that needed to be answered in the survey included:

- Is the list adequate in describing the job domain?
- Which tasks were performed extensively?
- Which tasks were considered critical (for the whole population, or subgroups)?

First of all, of those who responded to a question about the adequacy of the task list in describing the job domain, 92.4% found the list complete or adequate.

Some of the importance ratings of some tasks may have far reaching ramifications for many areas of the AML field. Here are some results:

- Almost 95% of respondents reported having to recognize money laundering risks in non-bank financial institutions and attributed a high level of importance to this job duty. A lesser percentage (89%) of respondents said having to recognize money laundering risks through non-financial businesses and professions.

- 20% said that producing records for the government never comes into play when working as an AML specialist.

- 91% of the respondents reported utilizing technology applications in their AML roles.

- 30% said they have never provided expert statements in court on behalf of their institution.

- 30% said they never had to recommend to the institution whether to terminate an employee who may be involved in money laundering.

- 75% reported having implemented an anti-money laundering program to branches in various countries.

- 90% reported having performed background investigations

- 92% said they have operated electronic anti-money laundering tools

- 100% reported having to recognize trends in money laundering from government reports

- Below is an overview of some of the most performed tasks:
Some of the least performed tasks were:

<table>
<thead>
<tr>
<th>Task</th>
<th>% of respondents that never performed this task</th>
</tr>
</thead>
<tbody>
<tr>
<td>Provide expert statements on behalf of the institution</td>
<td>31%</td>
</tr>
<tr>
<td>Summarize procedures for giving evidence in money laundering court cases</td>
<td>30%</td>
</tr>
<tr>
<td>Recommend to the institution whether to terminate an employee who may be involved in money laundering</td>
<td>28%</td>
</tr>
<tr>
<td>Design and implement appropriate screening of employees to ensure high hiring standards within an institution</td>
<td>25%</td>
</tr>
<tr>
<td>Apply and implement an AML program to branches in various countries</td>
<td>25%</td>
</tr>
</tbody>
</table>

Respondents were also asked to rate the importance of each task on the following scale:

1 = minimum importance
2 = below average importance
3 = above average importance
4 = extreme importance

Some of the tasks that were rated as most important are the following:

<table>
<thead>
<tr>
<th>Task</th>
<th>Importance rating (mean)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Recognize money laundering methods through bank and deposit-taking institutions</td>
<td>3.73</td>
</tr>
<tr>
<td>Identify suspicious activity</td>
<td>3.71</td>
</tr>
<tr>
<td>Implement KYC procedures for an AML program</td>
<td>3.71</td>
</tr>
<tr>
<td>Obtain senior management endorsement</td>
<td>3.54</td>
</tr>
<tr>
<td>Cooperate with the authorities regarding suspicious transaction reports</td>
<td>3.53</td>
</tr>
</tbody>
</table>

Some of the tasks that were rated as least important are the following:

<table>
<thead>
<tr>
<th>Task</th>
<th>Importance rating (mean)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Articulate requirement of international money laundering conventions</td>
<td>2.20</td>
</tr>
</tbody>
</table>
Articulare requirements of EU Directives on money laundering | 2.50
Articulate requirements of FATF organizations | 2.63
Explain the basis for cooperation between countries in money laundering cases | 2.67
Articulate requirements of Basel Due Diligence principles | 2.73

(The complete list of 59 tasks with their mean importance rating, and standard deviation, is included in the full report)

The report further includes a complete importance analysis of each task for population subgroups, organized by number of years of experience, and depending on whether more or less than 60% of the respondent’s job is related to specific AML duties.

After examining task-rating results, the AC established decision rules designed to narrow the broader list of 59 tasks to only those that were critical to job success. These rules were designed to identify tasks that were extensively performed and highly important.

Applying these decision rules 56 tasks were retained across the above mentioned four major content areas. These 4 content areas formed the organizational structure of test specifications meaning that each examination item (question) will link to one of these 56 validated tasks.

Conclusions

The main objective of the JTA was to ensure that stakeholders can be confident that examinations constructed of questions linked to the content outline would produce scores that fairly measure job behavior and tap constructs critical to competent practice.

In addition, the JTA can be used by organizations in the AML field to determine and document the “job relatedness” of employment procedures such as training, selection, compensation, and performance appraisal.

Training needs: Job Analysis can be used in training/needs assessments to identify or develop:

- training content
- assessment tests to measure effectiveness of training
- equipment to be used in delivering training
- methods of training (small group, classroom, CBT, etc.)

Compensation: Job analysis can be used in compensation to identify or determine:

- skill levels
- compensable job factors
- work environment
- responsibilities
- required level of education
Selection procedures: Job analysis can be used in selection procedures to identify or determine:

- job duties that should be included in advertisements of vacant positions
- appropriate salary level for the position to help determine what salary should be offered to a candidate
- minimum requirements (education) for screening applicants
- interview questions
- selection instruments
- applicant appraisal/evaluation forms
- orientation materials for new hires.

Job analysis can be used in performance review to identify or determine:

- goals and objectives
- performance standards
- evaluation criteria
- length of probationary periods
- duties to be evaluated

In addition, some duties and tasks that are identified in the job analysis are often performed using software. Software vendors and other suppliers could use the information to build training products around tasks that have been identified as critical.
Use this form to order your complete 75-page report

An International Job Task Analysis of the “Anti-Money Laundering Specialist”

The 75-page JTA Complete Report

Order Form

Name _______________________________ Title ______________________

Company __________________________________ Phone __________________

Address 1 __________________________________ Fax ______________________

Address 2 __________________________________ email _____________________

City ______________________________________ State ______________________

Country __________________ Zip/postal code ______________________________

___ Bill me ___ Check enclosed ____ Credit Card

Name on credit card ___________________________________________________

Credit card # ___________________________________ Expiration date ________

___ Wire Transfer to Mellon United National Bank, Miami FL USA, #067009646, for ACAMS, account number #0051146587

<table>
<thead>
<tr>
<th>Quantity</th>
<th>Item</th>
<th>Price</th>
<th>Totals</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Member priced JTA Complete Report</td>
<td>$295</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Non-member priced JTA Complete Report</td>
<td>$395</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Shipping and Handling in USA</td>
<td>$12</td>
<td></td>
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<tr>
<td></td>
<td>Shipping and Handling</td>
<td>$25</td>
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<tr>
<td></td>
<td><strong>Total</strong></td>
<td></td>
<td>**</td>
</tr>
</tbody>
</table>

Fax your order to: +1.605.373.7788

Or

Mail your order to 1101 Brickell Ave, Suite 601-South, Miami, FL 33131

Or

Call your order to ACAMS at +1.305.373.0020

Code: CXJ0001

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Job Analysis Survey Form
Welcome to the Association of Certified Anti-Money Laundering Specialists (ACAMS) job analysis survey for an International Core Examination.

Please use your mouse to select responses unless you are directed otherwise. Navigate through the survey using the toolbar at the bottom of the screen. Single arrow buttons < and > will take you to the previous or next task. The double arrow button >> will take you to the next unmarked task.

Please do not use the "Back" button on your browser or you will cause an error and will need to re-start the survey.

To leave the survey at any time click the "Cover" button in the lower left corner of the screen. If would like to return to the survey at a later time, click "Exit". When you completely finish the survey such that you do not want to return and revise or add to your responses, click "Finish and Exit".

**It is very important you complete your survey responses by August 4, 2002**

The purpose of the CAMS International Core Examination is to evaluate knowledge of risk management, compliance, and investigation skills common to anti-money laundering specialists around the world. The test will be designed for universal application. Therefore, this first core examination will not test candidates’ specific knowledge of country-specific laws and regulations.

ACAMS has undertaken this study to explore areas of common practice among specialists working in a variety of settings who perform varied functions. You will find tasks in the survey intended to describe a broad range of skills that may be necessary for effective job performance.

ACAMS intends to follow Core Examination development with other test modules each covering laws and regulations of specific nations, so suggestions limited to additional international core content are welcomed at the conclusion of this task list.
Section 1: Directions

The purpose of this survey is to identify job tasks critical to effective performance as anti-money laundering specialists. Survey results will be used to identify critical dimensions of this role upon which a subsequent certification examination will be developed.

You will find a list of tasks in Section 2, some of which may be critical to your job. **Use the following scale to rate each task from the list.** Tasks you never perform should receive a zero (0) rating. Tasks you do perform, even rarely, should receive ratings from 1 to 4 depending on your judgment about importance for effective performance.

Relate importance ratings to your own role as an anti-money laundering specialist. **Please independently judge importance from how frequently you perform a task.** Some infrequently performed tasks may still be important and some frequently performed tasks may be relatively unimportant.

**IMPORTANCE SCALE**

How *important* is this task to your effective performance as an anti-money laundering specialist?

4 = Extreme importance  
3 = Above average importance  
2 = Below average importance  
1 = Minimum importance  
0 = Never performed

**Please keep in mind the following definition of an anti-money laundering specialist as you rate tasks:**

Anti-money laundering specialists recognize and help identify money laundering risks and methods in different job roles (e.g., Compliance Officer, Regulator, Law Enforcement Officer, Prosecutor). Specialists appreciate the international environment in which they operate and are familiar with varied anti-money laundering standards among nations. Specialists are charged to design and maintain effective compliance programs for institutions in which they work. Specialists are, or interface with, financial investigators and conduct, or actively support, investigation processes.
Section 2: Task Ratings

Part I. Money Laundering Risks and Methods

How important is this task to your effective performance as an anti-money laundering specialist?

Recognize methods of money laundering through various

| 0.1. bank and other deposit-taking institutions (e.g., credit unions, other credit institutions – building societies) | 0. Never performed |
| 0.2. non-bank financial institutions (e.g., insurance companies, broker-dealers, bureaux de change, money remittance businesses) | 1. Minimum importance |
| 0.3. non-financial businesses and professions (e.g., casinos, dealers in real estate and high-value items, lawyers, notaries, accountants, auditors, investment advisors) | 2. Below average importance |
| 0.4. Recognize and anticipate risks associated with new technologies (e.g., on-line banking, Internet casinos, on-line brokerage, e-commerce) | 3. Above average importance |
| 0.5. inherent risks of structures designed to hide beneficial ownership (e.g., trusts, shell corporations, off-shore companies, bearer of certificates of ownership) | 4. Extreme importance |
| 0.6. other known methods and risks (e.g. FATF Typologies, Egmont Group’s showcases) | 0. Never performed |
| 0.7. trends in money laundering methods identified from governmental reports of suspicious activities and agency advisories | 1. Minimum importance |

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Identify suspicious customer activity associated with

0.8. new relationships in multiple settings (e.g., bank accounts, multiple check-cashing transactions, settlement commercial transactions, brokerage accounts, credit facilities with casinos)

0.9. existing relationships in multiple settings (e.g., bank accounts, multiple check-cashing transactions, settlement commercial transactions, brokerage accounts, credit facilities with casinos)

0.10. Identify differing jurisdictional risks dependent on legislation, regulation, and secrecy laws (e.g., FATF member countries, Non-Cooperative Countries and Territories - “black list”, various governmental agency advisories, off-shore banking centers)

Part II. International Standards of Money Laundering Compliance

How important is this task to your effective performance as an anti-money laundering specialist?

Articulate requirements of

0.11. FATF recommendations and other initiatives
0.12. BASEL due diligence principles
0.13. international conventions (e.g., Vienna Convention, Strasburg Convention)
0.14. EU Directives on Money Laundering
0.15. regional FATF organizations (e.g., Asian Pacific Group on Money Laundering, CFATF) and other regional initiatives (e.g., OAS-CICAD, ASEAN)

0.16. Articulate appreciation of key US legislative and regulatory initiatives applied to transactions internationally

Part III. Money Laundering Compliance Program

How important is this task to your effective performance as an anti-money laundering specialist?

Design a money laundering compliance program

0.17. assess risk
0.18. develop internal anti-money laundering policies, procedures, and controls
0.19. obtain endorsement of senior management
0.20. implement Know-Your-Customer procedures
0.21. evaluate, implement, and operate Electronic Anti Money Laundering Tools
0.22. perform background investigation on customers and transactions based on internal and public information
0.23. monitor and trace money/funds through a business

0. Never performed
1. Minimum importance
2. Below average importance
3. Above average importance
4. Extreme importance
Design a money laundering compliance program

0.24. identify suspicious activity or transactions
0.25. process Suspicious Activity Reports internally
0.26. report results to the competent authority
0.27. cooperate with competent authority after reporting suspicious activity
0.28. manage regulatory or other legal implications of Suspicious Activity Reports
0.29. advise the business about ongoing risks
0.30. apply and implement an institution’s anti-money laundering program to branches and majority-owned subsidiaries located in various countries

Maintain an effective money laundering compliance program

0.31. evaluate program effectiveness
0.32. implement necessary program changes
0.33. identify trends from Suspicious Activity Reports and adapt the program as necessary
0.34. evaluate new business products and systems for potential misuse
0.35. communicate program effectiveness to appropriate personnel
0.36. compile necessary reports
0.37. oversee ongoing training of employees about the compliance program and changes to the program

0. Never performed
1. Minimum importance
2. Below average importance
3. Above average importance
4. Extreme importance
Maintain an effective money laundering compliance program

0.38. evaluate and respond to audit findings and recommendations in respect to the money laundering compliance program
0.39. identify and apply relevant trends from international and national typologies and exercises
0.40. conduct independent examinations and audits of anti-money laundering compliance programs
0.41. develop and implement appropriate screening programs to ensure high standards when hiring employees
0.42. encourage modern and secure techniques of money management as a means to encourage replacement of cash transfers
0.43. identify particular compliance issues posed by the increasing number of industries that are added to the ranks of regulated industries

Part IV. Conducting or Supporting the Investigation Process

How important is this task to your effective performance as an anti-money laundering specialist?

Maintain

0.44. contact with senior management and legal advisors on all investigations that result in reportable findings
0.45. an internal investigation log/diary
0.46. contact and cooperate with enforcement agencies

0. Never performed
1. Minimum importance
2. Below average importance
3. Above average importance
4. Extreme importance
0.47. Separate and secure any record or document that may be required by the court or the enforcement agencies.

0.48. Conduct basic internal research to support a financial investigation.

0.49. Deliver records to enforcement agencies in response to Subpoena/Court Order in accordance with the law.

0.50. Provide evidential/expert statements on behalf of the institution according to the law.

0.51. Summarize procedures for giving evidence during local proceedings in courts/tribunals.

0.52. Recommend to an institution whether to close an account or allow it to remain open when a suspicious activity report has been filed after consulting legal advisors and external law enforcement agencies.

0.53. Identify and provide records that are legally available to law enforcement officers without a subpoena.

Explain

0.54. how supervisory agencies can cooperate and how they lend expertise spontaneously or on request with law enforcement authorities in money laundering investigations and prosecutions.

0.55. the role of supervisory agencies to guard against control or acquisition of a significant participation in a financial institution by criminals or their confederates.
0.56. how and why national administrations estimate cash flows from various sources and combine this information with central bank information and explain the role of the International Monetary Fund and the Bank for International Settlement in this respect

0.57. the basis and means for cooperation between countries in confiscation, mutual assistance, and extradition

0.58. Describe how authorities can conduct spontaneous, or upon request, international exchanges of information related to suspicious transactions, persons, and corporations involved in those transactions, and the role of strict safeguards on privacy and data protection in this respect

0.59. Recommend whether to terminate or suspend an employee within the institution who may be involved in an activity under investigation

0.60. How well did this survey cover critical tasks for your role as an anti-money laundering specialist?

0. Never performed
1. Minimum importance
2. Below average importance
3. Above average importance
4. Extreme importance

If you felt this survey was inadequate in describing the Specialist's role, then please email missing tasks to Kim Cogdill. You should be able to click the link below to launch your e-mail software or you may manually address an e-mail to:

kcogdill@goamp.com

Ensure new tasks focus on job behavior, not just topics.
If you were able to decide how items on a CAMS examination were allocated across content areas, then what proportions would you give to each area?

*Ensure the sum of your four selections is equal to 100%.*

*Values in the pull-down menus are not percentages, but labels from the table to the right (e.g., label value 3 equals 20%).*

0.61. Money Laundering Risks and Methods  
0.62. International Standards of Money Laundering Compliance  
0.63. Money Laundering Compliance Program  
0.64. Conducting or Supporting the Investigation Process

<table>
<thead>
<tr>
<th>Choice</th>
<th>Percentage</th>
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<tbody>
<tr>
<td>1</td>
<td>10%</td>
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<td>2</td>
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<td>90%</td>
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<td>18</td>
<td>95%</td>
</tr>
</tbody>
</table>

**Section 3: Background Information Questions**

Please proceed to the final section of the survey and provide information about your background. This information will only be used to characterize the group of survey respondents. Information from individuals will be kept confidential.

0.65. In what country do you work?

*Use the keyboard to type your response in the space next to the Help button at the bottom of the screen.*

*Please do not use abbreviations*
0.66. If you work in the United States, then in what state or territory do you work?

*Use the keyboard to type your response in the space next to the Help button at the bottom of the screen.*

*Please do not use abbreviations*

0.67. How many years of professional experience do you have in the field of anti-money laundering?

*Use the keyboard to type your response in the space next to the Help button at the bottom of the screen.*

*Please type only the number omitting the word "years"*

0.68. What proportion of your responsibilities includes anti-money laundering work?

*Use the keyboard to type your response in the space next to the Help button at the bottom of the screen.*

*Please only type in the number omitting a percent sign (%)*

0.69. What is the highest level of formal education you have attained?

0. below a Bachelors degree
1. Bachelors degree
2. Masters degree
3. Doctorate degree

0.70. If you earned a university degree, then what was your major subject of study?

0. Engineering
1. Law
2. Natural Sciences
3. Social Sciences
4. Finance/Banking
5. Economics
6. Accounting
7. Other
0.71. What professional credentials or certifications do you hold?

*Select all that apply*
0. Compliance
1. Accounting
2. Law
3. Fraud
4. Information Systems
5. Other

0.72. What is your primary job function?

0. Compliance
1. Investigative/Enforcement
2. Law
3. Auditing
4. Regulatory
5. Education

0.73. In what kind of institution do you work?

0. Financial
1. Non-financial Commercial
2. Government/Regulatory

0.74. If you work in a financial institution, then in which of the following do you work?

0. Bank
1. Security house
2. Money transmitter
3. Financial advisor
4. Stock brokerage
5. Other

0.75. If you work in a non-financial commercial institution, then in which of the following do you work?

0. Casino
1. Metal dealer
2. Auto dealer
3. Realtor/Estate agency
4. Law firm
5. Consulting/Accounting company
6. Other
0.76. If you work in one of the financial sectors, then what is the asset size of the institution?

*Use the keyboard to type your response in the space next to the Help button at the bottom of the screen.*

*Only type in the number indicating asset size. Omit the monetary denomination sign.*

0.77. In what denomination (e.g., dollar, pound, yen) is asset size expressed?

*Use the keyboard to type your response in the space next to the Help button at the bottom of the screen.*

*Please do not use abbreviations*

0.78. If you work in a governmental/regulatory institution, then in which of the following do you work?

0. Investigative/Law Enforcement
1. Regulatory

0.79. What is your primary language?

*Use the keyboard to type your response in the space next to the Help button at the bottom of the screen.*

*Please do not use abbreviations*

0.80. In what other languages are you also competent?

*Use the keyboard to type your response in the space next to the Help button at the bottom of the screen.*

*Please do not use abbreviations*