

MEMO# 16580

September 26, 2003

TREASURY DECIDES NOT TO CHANGE CERTAIN ASPECTS OF THE CUSTOMER IDENTIFICATION PROGRAM RULES AFTER RECEIVING ADDITIONAL COMMENTS; REITERATES OCTOBER 1ST DEADLINE FOR CIP IMPLEMENTATION

[16580] September 26, 2003 TO: MONEY LAUNDERING RULES WORKING GROUP No. 56-03 TRANSFER AGENT ADVISORY COMMITTEE No. 90-03 RE: TREASURY DECIDES NOT TO CHANGE CERTAIN ASPECTS OF THE CUSTOMER IDENTIFICATION PROGRAM RULES AFTER RECEIVING ADDITIONAL COMMENTS; REITERATES OCTOBER 1ST DEADLINE FOR CIP IMPLEMENTATION As you know, the Department of the Treasury issued a notice in June seeking additional comments on two discrete issues relating to the recently adopted customer identification program (CIP) rules: (i) whether and under what circumstances financial institutions should be required to retain photocopies of identification documents relied on to verify customer identity; and (ii) whether there are situations when the regulations should preclude reliance on certain forms of foreign government-issued identification to verify customer identity.¹ Treasury has concluded, after reviewing more than 34,000 comments received on these issues, not to change the CIP rules. A copy of the final disposition of this additional comment period is attached.² More importantly, Treasury took this opportunity to remind financial institutions of the October 1, 2003 deadline for implementation of CIPs. According to the Release, numerous commenters from the financial community requested that Treasury extend the October 1, 2003 deadline for complying with the customer identification regulations in light of this additional comment period. The Release states in unequivocal terms, however, that the implementation deadline will not be extended and that Treasury expects all financial institutions covered by the customer identification regulations to have their customer identification program drafted and approved by October 1, 2003. Robert C. Grohowski Associate Counsel Attachment (in .pdf format) 1 See Memorandum to Money Laundering Rules Working Group No. 42-03 and Transfer Agent Advisory Committee No. 63-03, dated June 27, 2003 [16244]. 2 Department of the Treasury, Customer Identification Programs for Financial Institutions, 68 Fed. Reg. 55335 (Sept. 25, 2003) (the "Release").

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