

From: "Cline, Brian" <Brian.Cline@ihe.com> on 03/02/2006 03:44:58 PM

Subject: Suspicious Activity Report

We have discussed your 60 minute burden estimate of completing the Suspicious Activity Report form at our Enterprise-wide Compliance Committee. While our committee agreed that the time to file out, review, and file the form was roughly accurate, we felt that you should also include the investigation time necessary to ensure SAR compliance. Our estimate based on years of historical experience is 4.5 hours per SAR. This includes the following necessary steps needed to ensure accurate filing of the SAR.

- Complete, review, and file SAR- 1 hour
- Determine if activity warrants additional investigation to determine if suspicious- 0.5 hour
- Investigate the activity to compile needed information necessary to begin completing the SAR- 2.5 hours
- Document to regulatory standards the investigative process and decision of whether or not to file- 0.5 hour

It is important to note that these time estimates do not include time we would have spent on routine institutionalized fraud detection and mitigation. These timeframes focus on time required to file a SAR in compliance with the regulations.

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