

THE TSEVEN9

# DEFENSIBILITY GAP CHECKLIST

A Structural Self-Assessment for Chief Compliance Officers and Enterprise Risk Leaders

<p><b>INSTRUCTIONS:</b> Check the box ONLY if you can provide immediate, physical documentation to an auditor today. Partial or informal evidence does not qualify.</p>		
<input type="checkbox"/>	<p>LAYER 1 <b>Risk Identification &amp; Assessment</b></p>	<p>We possess a centralized, board-approved Enterprise Risk Assessment that has been updated and formally signed off within the last 12 months, and that explicitly incorporates FinCEN's current government-wide illicit finance priorities.</p>
<input type="checkbox"/>	<p>LAYER 2 <b>Visibility</b></p>	<p>We maintain a consolidated risk signal aggregation mechanism that captures transaction anomalies, complaint patterns, and operational exceptions across all business lines and channels, with documented evidence of regular management review.</p>
<input type="checkbox"/>	<p>LAYER 3 <b>Documentation</b></p>	<p>Every material compliance investigation generates a structured workpaper containing explicit regulatory citations, documented sampling methodology, analytical reasoning, and evidence-based conclusions that allow independent reconstruction of the decision.</p>
<input type="checkbox"/>	<p>LAYER 4 <b>Escalation</b></p>	<p>We have a documented escalation matrix that explicitly defines materiality thresholds and SLA reporting timeframes to the executive team, with documented evidence of the last three instances in which the threshold was formally triggered and acted upon.</p>
<input type="checkbox"/>	<p>LAYER 5 <b>Corrective Action Discipline</b></p>	<p>Our corrective action program requires documented root cause analysis for every material finding, with independent validation retesting confirming that the root cause — not merely the symptom — has been eliminated before the finding is formally closed.</p>
<input type="checkbox"/>	<p>LAYER 6 <b>Governance Signaling</b></p>	<p>Board committee minutes from the past four quarters contain documented evidence that the board actively reviewed material compliance findings, challenged management's risk assessments, and formally accepted or directed remediation of residual risk.</p>
<input type="checkbox"/>	<p>LAYER 7 <b>Policy &amp; Design Alignment</b></p>	<p>All internal policies contain direct citation mapping to the specific federal regulations they are designed to satisfy, and have been formally updated within 90 days of any relevant regulatory guidance change or material examination finding.</p>

## THE VERDICT

7	Architecturally Defensible	<p>Your governance architecture is structurally sound. You are prepared to withstand federal examination scrutiny and can produce documentary evidence of defensibility on demand.</p>
4 – 6	Structural Gaps Present	<p>Based on recent OCC, FinCEN, and FDIC enforcement patterns, institutions in this range represent the primary target of federal</p>

		examination pressure. Targeted architectural remediation is required.
<b>0 – 3</b>	<b>Critical Risk Blindness</b>	Your compliance architecture cannot withstand regulatory examination pressure. You face elevated probability of enforcement action exposure. Immediate, institution-wide remediation is required.

**NEXT STEP: BRING THIS CHECKLIST TO A 30-MINUTE DEFENSIBILITY ARCHITECTURE REVIEW**

We will map a targeted remediation plan for every unchecked box, simulate the examination pressure tests most relevant to your regulatory profile, and deliver a preliminary DCAI risk score across all seven architectural layers.

**Request your review: [info@tseven9.co](mailto:info@tseven9.co)**

Download the full Defensible Compliance Architecture Whitepaper at <https://www.tseven9.co/publications.html>