RTP Self-Audit Form

Instructions

RTP Participants are required to complete an annual self-audit (for each calendar year) to verify compliance with the RTP Participation and Operating Rules (“RTP Rules”) (RTP Operating Rule IX.A.2). Note that Participants that “go live” on RTP in the third or fourth quarters of a particular calendar year are not required to complete their first self-audit until the following calendar year (i.e., their first full year on the RTP system).

Upon completion of the required self-audit for a calendar year, Participants must submit this Self-Audit Form to The Clearing House by March 31 of the following calendar year to attest that the self-audit has been completed, and that any material findings of non-compliance were reported to the Participant’s audit committee or equivalent body responsible for overseeing the Participant’s internal controls.

The Clearing House does not require the RTP self-audit to be completed using any specific set of procedures or approach. The audit should be performed using standard auditing procedures and completed by the Participant’s internal audit division, audit committee, compliance department, or similar internal division; or by an independent third party auditor. Participants may wish to utilize the RTP Self Audit Workbook (“Workbook”) as a resource to assist with the design and execution of the audit. The Workbook identifies key RTP Rules that, at a minimum, The Clearing House expects Participants to evaluate in the course of the self-audit.

If applicable, the Participant should report any material findings of non-compliance identified in the self-audit to the Participant’s audit committee or equivalent body responsible for overseeing the Participant’s internal controls. For purposes of the RTP self-audit requirement, material findings of non-compliance consist of significant RTP Rules violations, as determined by the auditor in his or her professional judgment. The auditor may consider the severity, duration and pervasiveness of the violation when determining whether a finding of non-compliance with the RTP Rules is material. As a general matter, isolated instances of non-compliance with an RTP Rule will not be material for purposes of this Self-Audit Form provided the auditor determines that the Participant has strong controls to prevent re-occurrence of the rules violation(s).

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* Participants that “go live” on the RTP system in the first or second quarters of a calendar year are subject to the self-audit requirement for that calendar year (and each year going forward).

† Participants must complete the self-audit for each calendar year (e.g., based on a sampling period from that calendar year). Participants may use the period between the end of a calendar year and March 31 of the following year to complete their audit processes, internally report any material findings of non-compliance, and submit the Self-Audit Form to The Clearing House.
Participant Attestation

RTP Participant Name (Depository Institution Name): ______________________________

RTP Participant ID (Primary Routing Number): ______________________________

Name of Individual Completing Self-Audit Form: ______________________________

Title of Individual Completing Self-Audit Form: ______________________________

E-Mail of Individual Completing Self-Audit Form: ______________________________

The undersigned individual certifies that he/she is authorized to complete this attestation on behalf of the Participant identified above, and attests that such Participant has completed the annual self-audit required by the RTP Rules and that any material findings of non-compliance were reported to the Participant’s audit committee or equivalent body responsible for overseeing the Participant’s internal controls.

________________________________
Authorized Signature‡

________________________________
Date

Please return the completed form to RTPEnforcement@theclearinghouse.org.

‡ The authorized signer should be a representative from the Participant’s audit, compliance or legal department; or otherwise authorized under the Participant’s policies to provide the required attestation.