

# Compliance – Sensitive SAR and CSI Review

## Challenge

A Fortune 500 financial services institution had specialized, privileged materials that could not be released without express permission from the governmental agency holding the privileges. These materials included Suspicious Activity Reports (SAR) and Confidential Supervisory Information (CSI).

## Highlights

In order to review these materials, Legility team members were **trained** to familiarize themselves with them, a **CSI coordinator** position was developed, and **other repeatable processes** were put in place.

“The majority of the Legility team leaders have lead **multiple projects** for the client, and have thus **developed significant knowledge** about custodians and the finer distinctions between what might or might not be SAR/CSI.

This is a complex issue as the regulating agency is the actual holder of the privilege, not the financial institution itself, so the privilege cannot be “waived” by the financial institution. Dissemination of CSI information is punishable through fines. During the review of documents, SAR and/or CSI can be noted, and it is rarely explicitly marked as SAR, CSI or otherwise “privileged.”

To further complicate the process, there are no “bright line” rules regarding these documents or terms that guarantee certain inclusion or exclusion. Nevertheless, efforts must be made to ensure that these documents are not released.



**Solution**

SAR/CSI materials were prevalent in multiple matters for the client, so Legility team members underwent SAR/CSI training at the beginning of each new project for the client to ensure familiarity with the concepts. Legility also developed a core leadership team to be utilized on the client's projects to ensure consistency and maximize the knowledge management gleaned over the life of the various projects. The repeat use of review team members is helpful as well, as these team members begin with a greater understanding and familiarity with SAR and CSI.

Legility also developed the new position of "CSI Coordinator," an attorney responsible for the maintenance of the SAR/CSI training materials, training new team members, and assisting with global searches for protected materials prior to release to counsel. In addition, Legility worked with the client's technology vendors to maintain and update search terms that were used to highlight potential SAR and CSI terms in their review platforms, essentially serving as the central cog in the process utilized to update these lists.

The majority of the Legility team leaders have lead multiple projects for the client, and have thus developed significant knowledge about custodians, i.e., which are more likely to have SAR or CSI documents, as well as to know the finer distinctions between what might or might not be SAR/CSI.

**Process**

1. Discuss the problem with the client to understand what might be needed
2. Develop a multi-tiered approach to the problem:
  - Utilize education and training to make the review team aware of the privileges and how to recognize and properly code them as such
  - Update, continuously, the training provided to the review team members
  - Utilize technology through the use of key terms to highlight possibly protected material for review
  - Employ technology through the use of high-value searches to catch any protected materials prior to release to counsel.
3. Undertake ongoing training efforts to ensure that the team is knowledgeable about the issues.



Let's change the business of legal together.

[legility.com](https://legility.com) | +1.888.LEGILITY (+1.888.534.4548)