

Compliance Information and Document Request

CIDR EXAMINER EDITING INSTRUCTIONS

The CIDR template contains more than 200 specific requests for information and documents. It must be customized for each bank so that it includes only those items the EIC considers necessary to perform a risk-based, top-down examination, and does not request information or documents that the examiner could obtain from sources other than bank management (e.g. information available through the FDIC Intranet, Internet, prior exam workpapers, etc.). The bank must be consulted prior to completing the CIDR to help narrow the request. In addition to deleting unnecessary requests, be aware that there is some overlap between the information requests in the Interview Sheet and the CIDR. Be sure to delete duplicative CIDR requests unless there is a specific reason to repeat them.

Customizing the CIDR Template

1. The CIDR template is a WORD document that can be downloaded from GENESYS. Requests for information are presented first under each topic, followed by document requests in tables. Use these steps to create the request for a particular bank:
2. Save the CIDR to a new file:
 - Left click on File
 - Left click on Save As
 - Select a folder and assign a unique name to the document.
3. Insert the correct identifying information on the instruction page. If you are corresponding with the bank via FDICconnect, modify the instructions as appropriate.
4. Remove unnecessary requests:
 - Highlight requests for information and then delete.
 - For document requests, right-click in the cell with the unnecessary request item, select ***delete cells***, then select ***delete entire row***.
5. Add requests for information or documentation:
 - Insert requests for information by typing them at the beginning of the item you wish them to precede, then hit enter. The CIDR should re-number.
 - For document requests, right-click in the cell above which you want the new request to appear
 - Select ***insert row***; the row will appear above the current cell
 - Manually input the desired question or request.
6. Change, add, or delete the text of a request:
 - Edit requests for information as you would any WORD document.
 - For document requests, left click within the desired cell and edit as desired.
7. For each document request, indicate whether management should **Send** the documents to the field office, or **Hold** the documents at the bank for on-site review,

by placing an X in the appropriate box. The CIDR indicates that all requested information should be sent to the field office. If you wish information to be held at the bank, simply add a note to that effect in the request itself.

**INSTRUCTIONS FOR COMPLETING THE COMPLIANCE INFORMATION
AND DOCUMENT REQUEST (CIDR)**

We hope the following instructions will help reduce the burden of compiling and forwarding the information and documents requested in the CIDR:

1. The CIDR is also in electronic form on the diskette provided with this request.
2. The CIDR requests information and documents in a series of categories. If you open the CIDR document on your computer, you can type most of your responses to the information requests into the document itself. Hit "enter" twice after the request and then begin typing. The document will expand as you type which allows you to type as many lines as you need. **Please type all your responses in "Bold" type.**
3. If information is not applicable to your bank, simply type "NA."
4. In some cases it will be more convenient to attach a document instead of typing the information. For those instances, please label the document with the number of the request, and indicate in your response that a document is attached.
5. Please send only copies of requested documents; do not send originals.
6. Once you have completed the CIDR, print it, enclose all requested documents and then mail them to the **[insert geographic name]** Field Office using the self-addressed label provided with this information request. **Please include the completed CIDR on diskette and a printed hard copy of the document in the information package.** Compliance Examiner **[insert EIC or other appropriate name]** will contact you prior to the start of the examination for final coordination. In the interim, however, please feel free to contact **[insert EIC or other appropriate name and phone number]** if you have any questions or concerns about the information and document requested.

COMPLIANCE INFORMATION AND DOCUMENT REQUEST ver 2006

Part I: COMPLIANCE MANAGEMENT SYSTEM

Board of Directors and Senior Management Oversight

Please provide the following information:

1. Name, title and phone number of the officer who is the principal contact for specific information about the bank's compliance management system.
2. A current list of your bank's directors/trustees and officers, identified by name and title. Note anyone who is new to the Board since the last examination.

Please send or hold the following documents, as indicated:

Send	Hold	
		3. Minutes of board of directors' meetings held during the review period, including those addressing your compliance management system, fair lending, and other compliance matters. Include materials or exhibits referred to in the minutes.
		4. Minutes of the board's audit committee and any compliance-related Board or management committees operating at the bank (including a list of committee members). Include materials or exhibits referred to in the minutes.
		5. Minutes of the credit committee and the pricing committee, along with materials or exhibits referred to in the minutes and supporting documentation.
		6. Mission statement, business plan (one year and long term), and any strategic plan.

Compliance Program

Please provide the following information:

- 7. Name and location of individual(s) who can provide access to any written compliance program, procedures, or manuals.
- 8. The identity of internal and/or outside counsel for compliance matters.
- 9. A description of the compliance issues considered by counsel during the review period.
- 10. A description of the assigned responsibilities for coordinating compliance in each of the bank’s operating areas (functional, geographic, etc.).
- 11. A list of the bank’s compliance resources and reference material, such as subscriptions to a monthly compliance newsletter or to a compliance service website.
- 12. A description of your bank’s review processes that ensure that policies and procedures reflect current regulatory and legal requirements. Indicate any reviews performed or changes made to policies and procedures during the review period.
- 13. A description of your procedures for collecting and disseminating compliance-related information and any amendments to or new compliance procedures.

Please send or hold the following documents, as indicated:

Send	Hold	
		14. All compliance or compliance-related policies and procedures updated during the review period. If incorporated into general operational and administrative procedures, an index or outline of compliance topics covered would be helpful. Include any alternative or supplementary guidance (i.e. desk procedures or systems support) for compliance.
		15. Position descriptions and résumés for the compliance officer (s).
		16. Position descriptions and résumés of other persons with compliance responsibilities (including those in subsidiaries or divisions performing compliance services or originating business for the bank).
		17. Any correspondence from outside counsel relating to compliance matters.

Training

Please provide the following information:

18. The identity of those responsible for compliance-related staff training and a description of your compliance training program.
19. A description of training or other compliance-related professional development attended by management and staff with compliance responsibilities.
20. A description of any compliance training provided to the board of directors.

Please send or hold the following documents, as indicated:

Send	Hold	
		21. Training manuals and other training information related to compliance laws and regulations.
		22. Staff training records, including dates and participants, and topics covered.
		23. The results of any testing for: <ul style="list-style-type: none">• Compliance training for new staff• Training for existing staff in new compliance initiatives or requirements• Periodic retraining of existing staff

Internal Monitoring

Please send or hold the following documents, as indicated:

Send	Hold	
		24. Reports of compliance self-assessments, with supporting documentation, performed during the review period.
		25. Reports of loan quality control reviews, whether performed by bank personnel or by a third party.
		26. Checklists for loan quality control reviews.
		27. A loan quality control review frequency schedule.
		28. Reports of branch reviews or certifications relating to compliance regulations.

Consumer Complaint Response

Please provide the following information:

- 29. A description of all consumer-related litigation, pending litigation, or claims, judgments, and assessments in which the bank is or is likely to become involved; provide access to related records.
- 30. A description of any such litigation resolved during the review period and the outcome; provide access to related records.
- 31. A description of any investigations by other agencies (Dept of Justice, Dept of Housing and Urban Development, Equal Employment Opportunity Commission, or state or local authorities) in which the bank has been involved during the review period and the outcome; provide access to related records.

Please send or hold the following documents, as indicated:

Send	Hold	
		32. All complaints received by the bank (or by third-party service providers) regarding loan originations, loan servicing, deposit services, or other products or services, including any complaints alleging discrimination, together with the bank’s responses.
		33. Reports of any management reviews of the type, frequency, and distribution of consumer complaints.

Periodic Independent Testing and Audits (Internal/External)

Please send or hold the following documents, as indicated:

Send	Hold	
		34. Internal and external audit procedures, work programs, and risk assessment plans.
		35. Your most recent compliance audit (not your bank's last FDIC examination). Please arrange examiner access to audit workpapers.
		36. Audit schedules for the exam review period and the coming year.
		37. Follow-up reports on audit exceptions and corrective actions and management responses to the findings.

Third-party Service Providers

Please provide the following information:

- 38. A description of compliance assistance, consulting, or training provided by consultants or third parties. Please make arrangements for access to supporting documentation of work performed by third parties.
- 39. A list of third-party or affiliated vendors or service bureaus providing compliance reviews, loan quality reviews or other compliance-related services, such as tax service, flood determinations, disclosure forms, and escrow account administration.
- 40. A description of the oversight and review mechanisms used to determine whether third-party performance meets expectations.

Please send or hold the following documents, as indicated:

Send	Hold	
		41. Contracts and agreements (including guarantees where applicable) with third parties for compliance reviews and other compliance-related services, including internal audits and loan quality control reviews and copies of reports of the reviews.
		42. Records of due-diligence performed prior to retaining these third parties, and reports of performance reviews.

Information Systems Support for Compliance

Please provide the following information:

- 43. A description of any information system changes or conversions implemented or initiated during the review period and steps taken to ensure compliance.
- 44. A description of any project plans related to system changes or implementation.
- 45. A description of the oversight and review mechanisms used to determine whether third-party performance meets expectations and reports of any such reviews performed along with supporting documentation.

Please send or hold the following documents, as indicated:

Send	Hold	
		46. Records of testing of information systems handling compliance and related matters.
		47. Records of due-diligence performed prior to retaining third party information systems vendors, and reports of performance reviews.

Recordkeeping

Please provide the following information:

- 48. A description of forms control processes and mechanisms to disseminate new or revised forms.

Please send or hold the following documents, as indicated:

Send	Hold	
		49. Record retention schedule and record retrieval procedures

Product Development and Planning

Please provide the following information:

- 50. A description of any pre-implementation planning procedures.
- 51. Procedures for ensuring that compliance issues are addressed in acquisitions (whether of another institution or a branch, product, or loan portfolio).
- 52. The name and title of the officers and/or bank personnel who are appropriate contacts for specific information about the bank’s marketing program.

Please send or hold the following documents, as indicated:

Send	Hold	
		53. Records of review of new products or services for compliance, including records of any reviews by counsel.
		53. Records of pre-implementation testing of new products or services.
		54. Records of post-implementation testing of new products or services.
		55. Marketing-related material, including: <ul style="list-style-type: none"> • A copy of the bank's marketing and advertising budget. • A copy of your bank's written marketing and advertising policy, if applicable. • Access to the bank's advertising file, including: <ul style="list-style-type: none"> ○ Newspaper advertisements ○ Radio or TV scripts ○ Lobby brochures ○ Statement stuffers ○ Internet advertisements ○ Other forms of advertising

Part II: LENDING COMPLIANCE

Please provide the following information:

56. The names, titles and phone numbers of the officers and/or bank personnel who are appropriate contacts for specific information about the following products and related compliance matters. Please advise these individuals that Examiners may be contacting them before or during the examination, seeking general information regarding bank processes.
1. Consumer Real Estate Loans:
 2. Home Equity Loans:
 3. Consumer Construction Loans:
 4. Consumer Installment Loans:
 5. Credit Cards:
 6. Overdraft Protection:
 7. Commercial Loans:
 8. Dealer Loans:
 9. Government Guaranteed Loan Programs:
 10. Special Loan Programs (e.g., student loans, employee loans):
57. Name and location of the individual(s) who can provide access to the daily statement of assets and liabilities; and trial balances relating to all consumer loan categories (i.e. installment, home equity, single payment, residential mortgage, etc.), leases and deposits:
58. A description of any loan products that have been introduced since the last compliance examination.

Truth in Lending

Please provide the following information:

59. A list of the open-end credit plan(s) offered by the bank (including overdraft protection, personal and home equity lines of credit, credit cards, etc.).

Please send or hold the following documents, as indicated:

Send	Hold	
		60. Documentation on any Regulation Z reimbursement made pursuant to the Truth in Lending Act since the last compliance examination.
		61. The Consumer Handbook on Adjustable Rate Mortgages used for variable-rate loans.
		62. A list of all indices used by the bank for adjustable rate loan products since the last compliance examination.
		63. Copies of actual periodic billing statements for all open-end credit products sent to a customer where a finance charge was imposed for two consecutive billing periods (copy both sides of the statements).
		64. If the billing error notice is not included with the periodic billing statement, a copy of the annual billing error notice sent to open-end credit customers.
		65. Any bank policies regarding the sale of credit insurance.

Equal Credit Opportunity

Please provide the following information:

- 66. A description of any risk-based pricing and support for pricing tiers and costs.
- 67. A description of the procedures or provide a copy of the procedures currently followed when the bank takes adverse action on a verbal or written credit application submitted by:
 - a. Consumers
 - b. Businesses with gross revenues of \$1 million or less
 - c. Businesses with gross revenues of more than \$1 million.
- 68. A description of the bank’s procedures for maintaining credit information on married customers.
- 69. A description of the circumstances, if any, under which the bank requires a husband or wife to guarantee or co-sign a loan to his or her spouse.
- 70. A description of the procedures used to evidence whether loan applicants intend to be joint applicants.
- 71. A description of the notification given to an applicant by the bank or a dealer/ merchant in situations where the dealer or merchant requests credit from the bank for a customer and adverse action is taken on the application.
- 72. A description of the procedures followed by the bank to provide an applicant with a copy of an appraisal report used in connection with an application for credit to be secured by a lien on a dwelling.
- 73. Name and location of individual(s) who can provide access to documentation concerning loan denials and withdrawals for all consumer and business loan applicants during the last 25 months and 12 months, respectively.

Please send or hold the following documents, as indicated:

Send	Hold	
		74. The bank’s loan and appraisal policies, and any separate underwriting guidelines.
		75. All credit application forms used by the bank or dealers.
		76. Any instructions regarding credit scoring systems utilized by the bank, as well as an explanation of how the systems were formulated.
		77. All loan guaranty forms.
		78. Loan worksheets, prequalification sheets or similar forms.
		79. All other documents that the bank may use to request or record any personal information concerning loan applicants.

		80. Adverse action notice forms (both consumer and business) used during the previous 25 months.
		81. The form used to notify applicants of the right to receive a copy of the appraisal report used in connection with an application for credit that is to be secured by a lien on a dwelling.

Fair Housing – Technical

Please send or hold the following documents as indicated:

Send	Hold	
		82. Any property appraisal forms used by the bank or outside appraisers.
		83. Expense reports reflecting the cost of obtaining an appraisal from each outside appraisal firm used by the bank.

Home Mortgage Disclosure

Please provide the following information:

84. Name and location of the individual who can provide access to any set of census tract maps used by the bank and any source that the bank may use to convert a street address to a census tract.

Please send or hold the following documents as indicated:

Send	Hold	
		85. Electronic downloads of your bank’s HMDA Loan Application Registers for all years since [SPECIFY YEAR], including your current year-to-date Loan Application Register. If your [SPECIFY YEAR, OR “current year-to-date] register is not yet in electronic format, a hardcopy report will be sufficient. If your bank uses the FFIEC’s HMDA Data Collection Software, these files can be created by using the “ <i>Export For Other Purpose</i> ” function under the export option in the software. The “ <i>Export For Other Purpose</i> ” option will create a submission for internal use only.
		86. Documentation relating to any revisions made to the last three HMDA LARs after their initial filing with the Federal Reserve Board.

Flood Insurance

Please provide the following information:

87. A description of the procedures used to determine whether improved real estate or a mobile home securing a loan is located in a special flood hazard area and the name of the individual responsible for compliance.

88. A description of the procedures to ensure that borrowers receive timely notice of special flood hazards, the requirement for flood insurance, and the availability of federal disaster relief assistance.
89. A description of the procedures to ensure that required flood insurance coverage is obtained and maintained on a loan secured by improved real property or a mobile home in a special flood hazard area.
90. If a third party is used to determine flood hazard compliance:
 - a. The name and address of the service providing flood determination.
 - b. The initial fee for third party flood determination services.
 - c. The portion of this fee, if any, which is for life of loan coverage, versus initial determination.
91. A list of all loans located in Special Flood Hazard Areas.

Real Estate Settlement Procedures

Please provide the following information:

92. If, in connection with granting residential mortgage credit, the bank charges a fee for making an application, checking credit history, appraising or inspecting collateral, or for any other type of real estate settlement service, including making a loan commitment, then provide details.
93. If the bank required the use of a particular settlement service provider (attorney, law firm, title company, real estate broker, real estate appraiser, or others) and required the borrower to pay any portion of the cost of such service, then list:
 - a. Provider(s) names
 - b. Types of services rendered
 - c. Amount of customary charges imposed.
94. If the bank gave or accepted any fee, payment, advance, loan, service, discount, rebate or other consideration to or from any settlement service provider with whom the bank does business in connection with real estate mortgage lending, then provide details.
95. If the bank is involved in an affiliated business arrangement as defined in Section 3(7) of the Real Estate Settlement Procedures Act, then provide details.
96. If the bank maintains escrow accounts for federally related mortgage loans as defined in Section 3500.2 of the Real Estate Settlement Procedures, then describe the specific items included in the bank's escrow.

Please send or hold the following documents as indicated:

Send	Hold	
		97. The disclosure pertaining to the assignment, sale, or transfer of loan servicing provided to persons who apply for a mortgage-servicing loan as defined in 24 C.F.R. Section 3500.21(a).
		98. The Special Information Booklet given to residential mortgage loan applicants.

Home Ownership Counseling

Please send or hold the following documents as indicated:

Send	Hold	
		99. The notice delivered to borrowers regarding the availability of homeownership counseling.

Homeowners Protection Act

Please send or hold the following documents as indicated:

Send	Hold	
		100. Initial disclosures for fixed-rate, adjustable-rate, and high risk residential mortgages.
		101. Initial disclosures (at commitment) for residential mortgage loans with lender paid private mortgage insurance (PMI).
		102. Sample amortization schedules (showing actual transactions) for each type of loan.
		103. Annual disclosures for fixed-rate, adjustable-rate, and high risk residential mortgages, loans with lender paid PMI, and loans consummated prior to 7/29/99.
		104. Records of requests for cancellation.
		105. Report of loans for which PMI was terminated.
		106. Records of reviews and system testing (including computer program documentation) to confirm that calculations of amortization and loan to value ratios are accurate.

Preservation of Consumer's Claims and Defenses

Please send or hold the following documents as indicated:

Send	Hold	
		107. All note or contract forms used by the bank's dealers and for any purchase money loans made by the bank.

Credit Practices

Please send or hold the following documents as indicated:

Send	Hold	
		108. Notes, contracts, disclosures, and security agreements (including those furnished to dealers) for non-real estate secured consumer lending.
		109. Cosigner notices for consumer credit.

Fair Debt Collection Practices

Please provide the following information:

110. If the bank performed collection services for any defaulted consumer debts owed to third parties, provide details.

Please send or hold the following documents as indicated:

Send	Hold	
		111. Copies of any forms or form letters used to collect third-party debts.

Consumer Leasing

Please send or hold the following documents as indicated:

Send	Hold	
		112. A copy of the most recent trial balance for consumer leases.
		113. A copy of each disclosure statement used by the bank or distributed to dealers.

Consumer Compliance Examination Data Sheet for Loans

114. Please provide a loan report detailing loans originated (from [date] to [date]). Please segregate the report by month and break down loan types applicable to your bank. The list should include borrower name (short name is acceptable), origination date, and original amount. If codes are used on the report, please include the definition or meaning of each code. Fair lending examiners may request additional loan information at a later time. The following is an example of loan types broken down to specific categories.

Residential Consumer:

- Purchase Money Mortgage
- Refinance
- Residential Construction
- Home Equity Loans
- Home Improvement
- Home Equity Lines of Credit
- High Cost Mortgages
- Reverse Mortgages

Other Consumer:

- Overdraft Protection
- Installment Loans
- Credit Cards
- Indirect Auto
- Other Dealer Loans

Commercial:

- Secured by Real Estate
- Other Secured
- Credit Cards
- Unsecured

In addition, please provide the number of denied applications for each product type for the months of [*insert calendar months*].

Consumer Compliance Examination Data Sheet for Loans (continued)

115. Please check each feature applicable to your consumer loans:

<input type="checkbox"/>	Purchase Money Mortgage	<input type="checkbox"/>	Owner-occupied Construction
<input type="checkbox"/>	Refinance Mortgage	<input type="checkbox"/>	Required Interest Reserves
<input type="checkbox"/>	Home Improvement	<input type="checkbox"/>	Optional Interest Reserves
<input type="checkbox"/>	Home Equity Line of Credit	<input type="checkbox"/>	No Interest Reserves
<input type="checkbox"/>	Private Mortgage Insurance	<input type="checkbox"/>	Consumer Installment
<input type="checkbox"/>	Escrow	<input type="checkbox"/>	Overdraft Protection
<input type="checkbox"/>	Variable Rate Mortgage*	<input type="checkbox"/>	Credit Cards
<input type="checkbox"/>	Variable Rate Other Consumer*	<input type="checkbox"/>	Indirect Auto
<input type="checkbox"/>	Loans in Special Flood Hazard Area	<input type="checkbox"/>	Simple Interest
<input type="checkbox"/>	Credit Life/Disability Insurance	<input type="checkbox"/>	Rule of 78s
<input type="checkbox"/>	Loans secured by a Deposit Account where Interest Rate on Deposit Account is less than 5%	<input type="checkbox"/>	Add-on Interest
<input type="checkbox"/>	Vendor's Single Interest Insurance (VSI)	<input type="checkbox"/>	Guaranteed Automobile Protection Agreements (GAP)

* If the bank originates variable rate loans, please provide a list of all indexes used and the loan types applicable to each separate index.

Part III: DEPOSIT COMPLIANCE

116. Please list the names, titles and phone numbers of the officers and/or bank personnel who are appropriate contacts for specific information about compliance matters involving deposit accounts (Savings, CDs, MMDAs, Regulation CC, etc.).

Truth in Savings

Please provide the following information:

117. A description of any deposit accounts offered to consumers, identifying any new products introduced since the last compliance examination.
118. If the bank offered merchandise as a bonus or premium for certain deposits, provide details.

Please send or hold the following documents as indicated:

Send	Hold	
		119. Any written policies, procedures, practices and training materials relating to Truth in Savings.
		120. The initial disclosure form provided for each type of consumer deposit account since the last compliance examination, such as checking, savings and time deposits.
		121. The advance disclosure form for each account in which adverse changes in terms have occurred since the previous FDIC examination.
		122. A copy of one complete periodic statement (dated subsequent to the previous FDIC examination) for each type of interest bearing account which incurred maintenance fees.
		123. A copy of one complete periodic statement (dated subsequent to the previous FDIC examination) for each type of consumer account.
		124. The corresponding rate sheets for periods covered by periodic statements above.
		125. Notice forms used for maturing time accounts for both accounts with maturities less than one year and exceeding one year.

Interest on Deposits

Please provide the following information:

126. A description of the bank's procedures to monitor excessive activity in MMDAs, providing details including activity reports.
127. A description of the bank's procedures to monitor eligibility for NOW accounts, providing details including exception reports.

Please send or hold the following documents as indicated:

Send	Hold	
		128. Account agreements or other disclosures of limitations on transactions for money market deposit accounts (MMDAs).
		129. Records of customer notices and account closing or reclassification for repeated excessive transactions in MMDAs.
		130. The most recent trial balance for all NOW accounts, including full names, account numbers, and balances.
		131. Account agreements or other disclosure of early withdrawal restrictions or penalties and procedures for handling.
		132. Procedures and controls regarding finders or broker fees on demand deposits.

Electronic Fund Transfers (EFT)

Please provide the following information:

- 133. A description of your controls for issuing access devices.
- 134. A description of the terms and conditions for any bank loan programs involving electronic payments.
- 135. Please be prepared to provide access to records of error resolutions and consumer complaints, including correspondence with consumers, documentation of investigations, and tracking reports.

Please send or hold the following documents as indicated:

Send	Hold	
		136. A list of all EFT services performed by the bank, including, but not limited to: <ul style="list-style-type: none"> ○ Direct deposit (including Social Security transfers) ○ Preauthorized withdrawal of funds ○ Automated teller machine transfers ○ Point-of-sale terminal transfers
		137. Disclosure forms given to customers when opening an account and when adding EFT capabilities (ATM cards, Debit cards, etc.).
		138. EFT agreement and error resolution notice given to customers.
		139. A sample of periodic statements showing actual transaction activity (including all types of transfers, e.g., ATM deposits, direct deposits, preauthorized withdrawals, etc.); include any information printed on the back of the statements.
		140. A sample of ATM disclosures, fee notices, and receipts showing actual transaction activity.
		141. A sample of change in terms notices (if applicable) and records of transmittal
		142. Policies for liability on unauthorized electronic transfers, issuance of access devices, and preauthorized debits and credits.
		143. Any merchant agreements involving electronic fund transfers.

Expedited Funds Availability

Please provide the following information:

144. Describe your procedures for addressing Check 21 requirements, as incorporated into Regulation CC.

145. Describe to whom you provided the Check 21 disclosure.

Please send or hold the following documents as indicated:

Send	Hold	
		146. A copy of the Check 21 disclosure.
		147. The bank's procedures and/or procedures given to employees for providing funds availability and for placing holds.
		148. The bank's funds availability policy disclosures.
		149. Samples of the following showing transaction activity: <ul style="list-style-type: none"> a. Deposit receipts (or other notice) showing funds held and availability schedules for deposits of local and non-local checks b. Exception hold notices for each type of exception c. Case-by-case hold notices d. Pre-printed deposit slips and any special deposit slips

Part IV. INSURANCE AND INVESTMENTS

Insurance

Please provide the following information:

150. The name, title and phone number of the person who is the appropriate contact for specific information about insurance related compliance matters.

151. Is insurance sold in a physically distinct area from which deposits are taken?
 _____ (yes/no)

152. If “no”, explain:

153. How are insurance and annuities sold (select all that apply)?

<input type="checkbox"/>	By the bank	<input type="checkbox"/>	On behalf of the bank	<input type="checkbox"/>	On bank premises
--------------------------	-------------	--------------------------	-----------------------	--------------------------	------------------

	Yes/No	If Yes, How Many?
154. Do bank employees (employed solely by the bank) sell insurance?		
155. Do bank subsidiary employees (employed solely by subsidiary) sell insurance on behalf of the bank or on bank premises?		
156. Do bank subsidiary employees (employed dually by the bank and the subsidiary) sell insurance on behalf of the bank or on bank premises?		
157. Do affiliate employees (employed solely by the affiliate) sell insurance on behalf of the bank or on bank premises?		
158. Do affiliate employees (employed dually by the bank and the affiliate) sell insurance on behalf of the bank or on bank premises?		
159. Do unaffiliated third parties (employed solely by the third party) sell insurance on behalf of the bank or on bank premises?		
160. Do unaffiliated third parties (employed dually by the bank and the third party) sell insurance on behalf of the bank or on bank premises?		

161. Describe how bank employees who sell insurance or annuities are compensated:

162. Do bank employees who do not sell insurance receive compensation for referring customers to someone who does? If yes, describe the compensation plan:

163. Primary Insurance or Annuity Vendor (Name):

(check one) First Vendor Used Same Vendor as last exam Different vendor

164. Insurance Products Offered (select all that apply)

<input type="checkbox"/>	Auto	<input type="checkbox"/>	Health	<input type="checkbox"/>	Casualty	<input type="checkbox"/>	Life (including variable life)
<input type="checkbox"/>	Credit Life	<input type="checkbox"/>	Private Mortgage	<input type="checkbox"/>	Crop	<input type="checkbox"/>	Property <input type="checkbox"/> Other

165. Annuity Products Offered (select all that apply)

<input type="checkbox"/>	Fixed	<input type="checkbox"/>	Variable
--------------------------	-------	--------------------------	----------

166. Does the bank have a subsidiary or affiliate that sells insurance or annuities?
 ____ yes/no Name of subsidiary or affiliate:

167. Does a bank subsidiary or affiliate underwrite insurance or annuities (i.e. the entity is responsible for insuring risks)? ____ yes/no
 Name of subsidiary or affiliate:

168. Does the bank or any entity selling insurance/annuity products on its behalf or on its premises maintain an Internet site? ____ yes/no

If “yes”, check those that apply in the table below:

	Contains Insurance Information	Able to initiate sales transaction	Provides link to insurance vendor
Bank Site			
Subsidiary Site			
Affiliate Site			
Unaffiliated Third Party Site			

Please send or hold the following documents as indicated:

Send	Hold	
		169. Policies and procedures including those relating to management oversight, internal controls, compensation (including referral compensation), and record-keeping.
		170. Agreements with third parties.
		171. Sample disclosures to customers or prospective customers and acknowledgement forms.
		172. Advertising and promotional material.
		173. Consumer complaints and records of resolution.
		174. Training material and records.
		175. Product management reports, including monitoring or audit reports.
		176. Regulatory reports.
		177. Sales personnel license records.

Investments

Please provide the following information:

178. The names, titles and phone numbers of the officers and/or bank personnel who are appropriate contacts for specific information about investment related compliance matters.

179. How are investments sold? (select all that apply)

By the bank
 On bank premises
 Through referrals from the bank

180. If investments are sold on bank premises, is it in a physically distinct area from which deposits are taken? _____ (yes/no) If “no”, explain:

	Yes/No	If Yes, How Many?
181. Do bank employees (employed solely by the bank) sell investments?		
182. Do bank subsidiary employees (employed solely by subsidiary) sell investments on bank premises or pursuant to referrals from the bank?		
183. Do bank subsidiary employees (employed dually by the bank and subsidiary) sell investments on bank premises or pursuant to referrals from the bank?		
184. Do bank affiliate employees (employed solely by the		

	affiliate) sell investments on bank premises or pursuant to referrals from the bank?		
185.	Do bank affiliate employees (employed dually by the bank and the affiliate) sell investments on bank premises or pursuant to referrals from the bank?		
186.	Do unaffiliated third parties (employed solely by the third party) sell investments on bank premises or pursuant to referrals from the bank?		
187.	Do unaffiliated third parties (employed dually by the bank and the third party) sell investments on bank premises or pursuant to referrals from the bank?		

188. If bank employees sell investments, describe how they are compensated:

189. Do bank employees who do not sell investments receive compensation for referring customers to someone who does? If yes, describe the compensation plan:

190. Primary Investment Vendor (Name):

(check one)

<input type="checkbox"/>	First Vendor Used	<input type="checkbox"/>	Same Vendor as last exam	<input type="checkbox"/>	Different vendor from last exam
--------------------------	-------------------	--------------------------	--------------------------	--------------------------	---------------------------------

191. Investment Products Offered (select all that apply)

<input type="checkbox"/>	Corporate Securities and Bonds	<input type="checkbox"/>	Government Securities
<input type="checkbox"/>	Mutual Funds: Money Market	<input type="checkbox"/>	Mutual Funds: Corporate Securities
<input type="checkbox"/>	Mutual Funds: Corporate Bonds	<input type="checkbox"/>	Mutual Funds: Corp. Securities and Bonds
<input type="checkbox"/>	Mutual Funds: International	<input type="checkbox"/>	Mutual Funds: Other
<input type="checkbox"/>	Retail Repurchase Agreements	<input type="checkbox"/>	Other Investment Product
<input type="checkbox"/>	Variable Annuities		

192. Does the bank offer proprietary products? _____ (yes/no)

If "yes", indicate all proprietary products offered below:

<input type="checkbox"/>	Government Securities	<input type="checkbox"/>	Mutual Funds: Money Market
<input type="checkbox"/>	Mutual Funds: Corporate Securities	<input type="checkbox"/>	Mutual Funds: Corporate Bond
<input type="checkbox"/>	Mutual Funds: International	<input type="checkbox"/>	Mutual Funds: Corp. Securities and Bonds
<input type="checkbox"/>	Other Investment Products	<input type="checkbox"/>	Variable Annuities

193. What entity serves as the proprietary products manager/advisor?

<input type="checkbox"/>	Bank	<input type="checkbox"/>	Bank Subsidiary
<input type="checkbox"/>	Bank Affiliate	<input type="checkbox"/>	Other Financial Institution

194. Does the bank offer sweep accounts? ___(yes/no)

Bank sweep accounts transfer funds between deposit accounts and (select all that apply):

<input type="checkbox"/>	Mutual funds	<input type="checkbox"/>	Retail repurchase agreements
<input type="checkbox"/>	Government securities	<input type="checkbox"/>	Other investments

195. Does the bank or any entity that sells investment products on its behalf or on its premises maintain an Internet site? ____ (yes/no)

If “yes”, check those that apply in the table below.

	Contains Investment Information	Able to initiate sales transaction	Provides link to investment vendor
Bank Site			
Subsidiary Site			
Affiliate Site			
Unaffiliated Third Party Site			

196. Does a bank affiliate underwrite securities? ____ (yes/no)
Name of affiliate:

197. Has the bank, its subsidiary, or its affiliate registered with the SEC as a broker? ___(yes/no)
Name of registered party:

198. Has the bank, its subsidiary, or its affiliate registered with the SEC as a dealer? ___(yes/no)
Name of registered party:

Recordkeeping, Notification, and Settlement

199. Are securities transactions effected by the bank subject to Part 344 of the FDIC’s regulations? ___(yes/no)
If “no”, identify the applicable exception contained in Part 344.2:

200. If bank securities transactions are subject to Part 344, where does the bank maintain chronological sales records, account identification records, order tickets, listing of broker/dealers that effected transactions, and copies of notifications provided to customers?

Please send or hold the following documents as indicated:

Send	Hold	
		201. Policies and procedures including those relating to management oversight, internal controls, compensation (including referral compensation), and record-keeping.
		202. Agreements with third parties.
		203. Sample disclosures to customers or prospective customers and acknowledgement forms.
		204. Sample customer notifications and account statements.
		205. Advertising and promotional material.
		206. Consumer complaints and records of resolution.
		207. Training material and records.
		208. Product management reports, including monitoring or audit reports.
		209. Regulatory reports.
		210. Reports of personal securities trading by personnel subject to Part 344.9.
		211. Sales personnel license records.

Part V: PRIVACY AND CONSUMER INFORMATION

Right to Financial Privacy

Please provide the following information:

- 212. If the bank provided any Federal government authority access to the financial records of a customer, then provide the name and location of the individual who can provide access to any files relating to the release of this information.

Privacy of Consumer Financial Information

Please provide the following information:

- 213. Name and location of the individual responsible for the administration of the bank's privacy policies and procedures.
- 214. If the bank discloses nonpublic personal information about consumers to nonaffiliated third parties to market the bank's own products or services, or market financial products or services offered pursuant to joint marketing agreements between the bank and another financial institution, then provide details.
- 215. If the bank receives nonpublic personal information about consumers from nonaffiliated financial institutions, then provide details.
- 216. If the bank discloses, directly or through affiliates, account numbers or similar access numbers or codes for consumers' credit card accounts, deposit accounts, or transaction accounts with nonaffiliated third parties (other than a consumer reporting agency) for use in marketing, then provide details.
- 217. If the bank shares nonpublic personal information with nonaffiliated third parties subject to an opt-out, provide details about the about opt-out methods, systems, and controls in place to ensure that information is not shared after a consumer has opted-out.

Please send or hold the following documents as indicated:

Send	Hold	
		218. The privacy notice(s) (initial, annual, and/or revised) and opt out notice(s), if applicable, that the bank delivers.
		219. Contracts and agreements with nonaffiliated third parties with whom you have joint marketing agreements, or those that perform marketing services on your behalf.

Fair Credit Reporting Act (FCRA)

Please provide the following information:

- 220. Describe the controls in place to ensure that consumer report information obtained from consumer reporting agencies are obtained only for permissible purposes. Include a description of controls on employee access to on-line credit reports and credit score information.
- 221. Describe the bank’s policies and procedures for sharing information with affiliates. Include a description of the type of information shared, and the purposes for which it is shared. If information is shared subject to an opt-out notice, please describe the opt-out methods, systems, and controls in place to ensure that information is not shared after a consumer has opted-out.
- 222. Describe the bank’s policies for using medical information about a consumer in connection with any determination of the consumer’s eligibility, or continued eligibility for credit.
- 223. Describe the bank’s policies or processes for obtaining consumer reports on prospective or current bank employees.
- 224. Describe the criteria that were used to select consumers using prescreened consumer reports. Include both the pre-screen criteria and any post-screen criteria and requirements.
- 225. Describe the bank’s policies and processes for furnishing information to consumer reporting agencies. Include routine transmissions of data and the process for resolving accuracy and error disputes received from consumer reporting agencies and from consumers.
- 226. Describe the bank’s policies and procedures when a consumer report containing a fraud or active duty alert is received by the bank.

Please send or hold the following documents as indicated:

Send	Hold	
		227. Copies of contract(s) with each consumer reporting agency from which the bank obtains consumer reports.
		228. Copies of disclosures and notices used in conjunction with obtaining consumer reports on prospective or current bank employees.
		229. Sample of prescreening-related consumer correspondence, including disclosures to consumers, notification of opt-out procedures, and all solicitation materials.
		230. Instructions to consumer reporting agencies and sample output for each

		prescreening activity.
		231. Records of responses to solicitations that did not result in an extension of credit or insurance.
		232. Sample of Credit Score Disclosure and Notice to Home Loan Applicants.
		233. Sample Negative Information Notice.
		234. If the bank is a consumer reporting agency, please provide: <ul style="list-style-type: none"> a. Sample consumer reports provided by the bank b. Procedures for providing consumer reports c. Notice to providers of information included in consumer reports d. Procedures for providing disclosures to consumers, including sample report and notices e. Procedures for handling investigative reports and reports for employment purposes f. List of fees charged in connection with disclosures or notification

Children’s Online Privacy Protection

Please provide the following information:

- 235. If the bank operates an Internet site or online service directed to children that collects or maintains personal information about them, then provide details.
- 236. If the bank operates a general audience Internet Web site or other online service that could collect or maintain personal information from children online, then provide details.
- 237. If you answered yes to either question 1 or 2, does the bank participate in an FTC-approved, self-regulatory program? If yes, provide details.

Please send or hold the following documents as indicated:

Send	Hold	
		238. Notice(s) to parents of the bank's practices with regard to the collection, use, and/or disclosure of a child's personal information.

Controlling the Assault of Non-Solicited Pornography and Marketing Act (CAN-SPAM)

Please provide the following information:

- 239. Describe the bank’s policies and procedures for complying with CAN-SPAM. Include a brief description of the source of e-mail within the bank and the controls over the content and distribution of e-mail subject to the Act.
- 240. Describe the bank’s process for receiving, processing, and honoring opt-out choices returned to the bank from recipients of e-mail subject to the Act.

Please send or hold the following documents as indicated:

Send	Hold	
		241. List of products or services that the bank has promoted by e-mail.
		242. Sample of e-mail(s) sent.
		243. E-mail address used by the bank to receive opt-out requests from recipients of bank e-mail subject to the Act.

Telephone Consumer Protection Act (TCPA)

Please provide the following information:

- 244. Describe the bank’s policies and procedures for complying with the TCPA.
- 245. Describe the bank’s process for honoring and maintaining records of do-not-call instructions as well as the bank’s process for complying with national do-not-call rules.

Please send or hold the following documents as indicated:

Send	Hold	
		246. List of marketing or promotional programs for products and services that the bank promoted with telemarketing either directly or through a third party vendor.

Part VI. ELECTRONIC BANKING

Please provide the following information:

247. Bank's Web site address: _____

248. The names, titles and telephone numbers of the officers and/or bank personnel who are appropriate contacts for specific information about the compliance aspects of the bank's electronic banking activities.

249. If the bank has plans for expanding any electronic banking activities, programs, or capabilities in the near future, provide details.

Mark all that apply with an X

250. **Delivery Channels:**

<input type="checkbox"/>	Internet	<input type="checkbox"/>	PC Banking (Dial-Up)	<input type="checkbox"/>	Phone Banking
<input type="checkbox"/>	Automated Loan Machines	<input type="checkbox"/>	Electronic Money Products		

Online Activities Conducted (via Internet or PC Banking):

251. **Informational Content (including advertisements, rate displays, lists of services, etc.)**

<input type="checkbox"/>	Deposit-Related
<input type="checkbox"/>	Lending-Related
<input type="checkbox"/>	Non-deposit Products

252. **Information Exchange and Transactional Functions**

Deposit-Related

<input type="checkbox"/>	Disclosures Online	<input type="checkbox"/>	Account Application	<input type="checkbox"/>	Transfer Funds
<input type="checkbox"/>	Review Account Statement	<input type="checkbox"/>	Bill Payment Services		

Lending-Related

<input type="checkbox"/>	Disclosures Online	<input type="checkbox"/>	Account Application	<input type="checkbox"/>	Transfer Funds
<input type="checkbox"/>	Review Account Statement	<input type="checkbox"/>	Bill Payment from Credit Line		

Non-deposit Products

<input type="checkbox"/>	Disclosures Online	<input type="checkbox"/>	Account Application	<input type="checkbox"/>	Transfer Funds
<input type="checkbox"/>	Review Account				

<input type="checkbox"/>	Statement
--------------------------	-----------

Electronic Mail

<input type="checkbox"/>	Transmit Disclosures	<input type="checkbox"/>	Accept Customer Inquiries/Complaints
--------------------------	----------------------	--------------------------	--------------------------------------

Electronic Signatures in Global and National Commerce Act (E-Sign)

Please send or hold the following documents as indicated:

Send	Hold	
<input type="checkbox"/>	<input type="checkbox"/>	253. Sample disclosures used to obtain customers' affirmative consent to receive disclosures electronically.

Part VII. COMMUNITY REINVESTMENT ACT

Please send or hold the following documents as indicated:

Send	Hold	
		254. Any CRA self-assessment(s) or an analysis of the geographic/income distribution of loans performed by the bank or other outside organization.
		255. A map or description of your assessment area(s). If the assessment area(s) consist of less than whole political subdivisions, describe how the area was determined.
		256. The public comments file.
		257. Documentation concerning community development activities that are funded or provided by the bank.
		<p>258. Information produced in the normal course of business about any specific efforts by your bank to respond to lending, investment and service opportunities in your assessment area. Sources of such information may include:</p> <ul style="list-style-type: none"> ○ Information about lending, investment, and service opportunities in your bank’s assessment area(s) either developed by your bank or obtained from community organizations, state, local and tribal governments, economic development agencies, or other sources ○ The bank’s business plan, strategic plan and annual report ○ Product assessment reports ○ Economic and demographic analyses ○ Customer surveys aimed at identifying product and service needs ○ Reports on participation in government insured, guaranteed or subsidized loan programs ○ Information relevant to your bank’s ability to meet community credit needs based on: <ul style="list-style-type: none"> ○ financial condition and size ○ statutory authority/legal restrictions ○ other factors.
		<p><i>Banks Subject To Large Bank CRA Data Collection Only:</i></p> <p>259. Separate electronic downloads of your bank’s CRA data on small business and small farm lending for all years since [Click here and type [Timeframe], including your current year-to-date CRA Loan Application Register. If your bank uses the FFIEC’s CRA Data Collection Software, these files can be created by using the “<i>Export For Other Purpose</i>” function under the export option in the software. The “<i>Export For Other Purpose</i>” option will create a submission for internal use only.</p>

Section 109 – Interstate Banking and Branching Efficiency Act of 1994 (IBBEA)

Please provide the following information:

- 260. A list of any interstate branches in existence for one year or more that were established pursuant to the IBBEA.
- 261. Has the bank or any of its branches been controlled by an out-of-state bank holding company for one year or more? _____ (yes/no). If yes, identify the branches.
- 262. If you answered yes to either question 1 or 2, does the bank have sufficient data to calculate a statewide loan-to-deposit ratio in each respective host State? *Note: The bank is not required to provide or assist in providing this information.*
- 263. A list of all census tracts located within your assessment area(s).
- 264. A list of branches opened or closed during the current year and each of the prior two calendar years (including street addresses and geographies), and a list of services generally offered at the branches.
- 265. **Small bank only:** The bank’s performance with respect to qualified investments and services may be used in the CRA evaluation to raise a Satisfactory CRA rating to Outstanding, but it cannot be used to lower a rating that otherwise would have been assigned. A bank may, however, receive an Outstanding rating without the consideration of investments and services. If you would like the bank’s investments and services to be reviewed during the examination, then please respond to the investment and service portions of the following request

Branch Closings

Please send or hold the following documents as indicated:

Send	Hold	
		266. A copy of any branch closing or relocation policy.