

Interview Sheet

INTERVIEW SHEET

BACKGROUND

This document is a guide for an examiner's initial discussion with a bank. It is designed to gather current information for tailoring the CIDR to request only those items necessary to conduct the examination. The interview sheet may also help with scoping the examination and with on-site logistics (e.g., setting up the phone line, ensuring that appropriate bank personnel will be available, etc.). The interview sheet should be used in conjunction with the Risk Profile and Scope Memorandum (RPSM) for both the current and last examinations. Before using it to plan and conduct a discussion with the bank an examiner should pull the RPSM from SOURCE for the current examination, and review the final RPSM for the last examination. The examiner should also locate documents available from within the FDIC and from public sources, in order to avoid unnecessary requests to the bank. Such documents may also raise questions to discuss with the bank.

This is a work paper; it is not necessary to type the banker's responses. There may be questions that are not relevant, depending on the bank being examined. Additions or changes may also be appropriate to address field or regional office requirements. The work paper should be adjusted as appropriate before holding a discussion with the banker.

Some of the items included on this interview sheet may be more appropriately included in the Compliance Information and Document Request (CIDR). For instance, an examiner may wish to have the bank respond in writing to a certain area. Such items should simply be moved from this list to the CIDR. There may also be items in the CIDR that an examiner wishes to discuss with the bank during the interview, and that is appropriate also.

The next pages are designed to help plan the examination and the interview.

Bank Name:	Street Address:
Bank Phone Number:	Mailing Address:
Bank President:	Bank Website:
Bank Compliance Officer:	Bank CRA Officer:

Cert. #	SHARP #
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Type of exam:	<input type="checkbox"/> FULL EXAM	<input type="checkbox"/> COE	<input type="checkbox"/> New Bank Investigation
	<input type="checkbox"/> FULL EXAM – NEW BANK	<input type="checkbox"/> COE – NEW BANK	<input type="checkbox"/> New Bank Visit
	<input type="checkbox"/> FULL EXAM – CHARTER FLIP	<input type="checkbox"/> COE – CHARTER FLIP	<input type="checkbox"/> Charter Flip Visit
			<input type="checkbox"/> Problem Bank Visit
			<input type="checkbox"/> Other

Telephone Ordered: / /	Order Number:
Install date: / /	Complete date: / /

Call Report Run?	<input type="checkbox"/> Y	<input type="checkbox"/> N
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Examination Request Letter Mailed or Sent via FDICconnect: / / (circle transmission method)	Bank has document imaging? <input type="checkbox"/> Y <input type="checkbox"/> N												
	If yes, survey on e-exam website completed: / /												
	By:												
	[http://fdic01/division/dsc/ebanking/exampilot/index.html]												
	<table border="1"> <tr> <td>Electronic Download Request</td> <td><input type="checkbox"/> Y</td> <td><input type="checkbox"/> N</td> </tr> <tr> <td>CIDR</td> <td><input type="checkbox"/> Y</td> <td><input type="checkbox"/> N</td> </tr> <tr> <td>CIDR diskette</td> <td><input type="checkbox"/> Y</td> <td><input type="checkbox"/> N</td> </tr> <tr> <td>Return Mailing Label(s)</td> <td><input type="checkbox"/> Y</td> <td><input type="checkbox"/> N</td> </tr> </table>	Electronic Download Request	<input type="checkbox"/> Y	<input type="checkbox"/> N	CIDR	<input type="checkbox"/> Y	<input type="checkbox"/> N	CIDR diskette	<input type="checkbox"/> Y	<input type="checkbox"/> N	Return Mailing Label(s)	<input type="checkbox"/> Y	<input type="checkbox"/> N
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FDIC Relationship Manager:

PRIOR EXAM DATE:	<i>Reviewed at last exam</i>		VIOLATIONS at last exam		COMMENTS
	YES	NO	<i>Significant</i>	<i>Isolated & Technical</i>	
Truth In Lending-(Federal Reserve Board's Regulation Z)					
Equal Credit Opportunity (Federal Reserve Board Regulation B)					
Fair Housing Act (Part 338 of FDIC Rules & Regs)					
Home Mortgage Disclosure Act (Federal Reserve Board Regulation C)					
Flood Insurance (Part 339 of FDIC Rules & Regs)					
Real Estate Settlement Procedures (Department of Housing and Urban Development's Reg X)					
Home Ownership Counseling					
Homeowners Protection Act					
Preservation of Consumer's Claims and Defenses					
Credit Practices Rule (Federal Reserve Board's Regulation AA)					
Fair Debt Collection Practices Act					
Consumer Leasing (Federal Reserve Board's Regulation M)					
Truth in Savings (Federal Reserve Board's Regulation DD)					
Electronic Funds Transfer (Federal Reserve Board Regulation E)					
Expedited Funds Availability (Federal Reserve Board Regulation CC)					
Check 21					
Interest On Deposits-Req Q (Part 329 of FDIC Rules & Regs)					

Consumer Protection in Sales of INSURANCE (Part 343 of FDIC Rules & Regs)					
Consumer Protection in Sales of INVESTMENTS (Part 344 of FDIC Rules & Regs)					
Government Securities (Treasury Regulations Parts 403.5(d) and 450)					
Right to Financial Privacy					
Privacy of Consumer Financial Information (Part 332 of FDIC Rules & Regs)					
Fair Credit Reporting Act					
Electronic Banking					
E-Sign Act					
Children's Online Privacy Protection Rule					
CAN SPAM					
Telephone Consumer Protection Act					
Advertisement of Membership (Part 328 of FDIC Rules & Regs)					
Unfair or Deceptive Acts or Practices (FTC Act Section 5)					
Community Reinvestment Act (Part 345 of FDIC Rules & Regs)					
Section 109 – Interstate Banking and Branching Efficiency Act of 1994 (IBBEA)					
Branch Closing Policy (Sec. 42)					

INTERVIEW

Introduction/principal purpose of call: <ul style="list-style-type: none">gather information so that the pre-examination request for written information and documents is tailored to the bank's operations, andhelp scope the examination.	
FDIC interviewer:	Interview Phone Call Date: / /
Bank Personnel Interviewed:	

EXAMINATION PLANNING

Discuss the time frame for the Compliance and CRA examination.

Discuss the examination focus – the *compliance management system*.

Discuss director participation in examination meetings/communication with examiners.

Discuss the entry letter and attached documents - the CIDR.

Request will indicate which items to “Send” or “Hold” – inform management that it is an option to send some of the CIDR information to the office.

Caution bank against copying large documents such as Board Minutes. However, if documents are available electronically, could provide on diskette.

Discuss with the bank whether it would be helpful to exchange documents electronically through FDICconnect.

Caution bank against creating something that does not exist (for example, “do not draft a resume”).

Caution against providing original documents, but if they do, to indicate such on the material.

[If bank does not offer particular product, just mark N/A on the returned CIDR hardcopy.]

Discuss the automated loan data download (requested in letter). [If request is to be made of bank, omit overlapping requests under Truth in Lending in the CIDR].

Discuss any vacations or known absences that may impact the timing of the examination (examiner or banker).

Verify the names of senior management and the mailing address for the PEP package.

Discuss installing an FDIC telephone line, and request the name of the bank's contact person to coordinate with the telephone company.

Ask whether the bank purchased another institution or branch since the previous examination.

CIDR CUSTOMIZATION

When the bank's answer to a question below is "No" the examiner should eliminate or adjust the corresponding request in the CIDR.

PART I: COMPLIANCE MANAGEMENT SYSTEM

BOARD OF DIRECTORS AND SENIOR MANAGEMENT OVERSIGHT		
	YES	NO
Has there been any change in control of the bank?		
Has there been any change in Directors?		
Has there been any change in Senior Officers?		
Does the Board have an audit committee?		
Any compliance-related Board or management committee?		
A credit committee?		
A pricing committee?		
Does the bank have a mission statement?		
Business plan?		
Strategic plan?		
COMPLIANCE PROGRAM		
	YES	NO
Has there been any change in bank personnel (e.g., compliance officer, assisting personnel) performing compliance functions since the previous examination?		

Has the bank consulted an attorney (internal or external counsel) on any compliance matters since the previous examination?		
Does the bank use a consultant or consulting company to manage its compliance program? [coordinate question with one below on third party service providers]		
TRAINING		
	YES	NO
Does the bank conduct testing of the staff's compliance knowledge subsequent to training, and maintain the results of such testing?		
INTERNAL MONITORING		
	YES	NO
Has the bank conducted compliance self assessments/reviews (for example, loan quality control reviews and branch reviews) since the previous examination?		
If yes, are records of the results available?		
CONSUMER COMPLAINT RESPONSE		
	YES	NO
Has the bank received any written consumer complaints since the last examination?		
Has the bank been party to any consumer-related litigation since the previous examination?		
Has the bank been involved in any investigations by other agencies (DOJ, HUD, EEOC, or state or local authorities) since the previous examination?		
PERIODIC INDEPENDENT TESTING AND AUDITS (INTERNAL/EXTERNAL)		
	YES	NO
Has the bank or an external party conducted a compliance audit since the previous examination?		

THIRD-PARTY SERVICE PROVIDERS		
	YES	NO
Does the bank use any third party or affiliated vendors to provide any of the following compliance related services?		
Compliance auditing		
training		
compliance consulting		
flood determinations		
disclosure forms		
escrow account administration		
other _____		
INFORMATION SYSTEMS SUPPORT FOR COMPLIANCE		
	YES	NO
Does the bank make use of any loan or deposit platform computer applications?		
If yes, are they new since the previous examination?		
Loan platform name:		
Deposit platform name:		
Has there been any change in the bank's data processing servicer or in the data processing system (conversions, upgrades, etc.) since the previous examination?		
Does the bank currently have loan document imaging capabilities? If no, does the bank have any plans for implementing document imaging in the future?		
RECORDKEEPING		
	YES	NO

Does the bank develop its own forms internally?		
PART II: LENDING COMPLIANCE		
	YES	NO
Has the bank introduced any new loan products since the previous examination?		
Has the bank purchased any loan portfolios since the previous examination?		
TRUTH IN LENDING		
	YES	NO
Does the bank offer any of the following open-end consumer credit products?		
Overdraft protection		
personal lines of credit		
home equity lines of credit		
credit cards		
other _____		
Does the bank offer any adjustable rate mortgages?		
Has the bank made any Regulation Z reimbursements since the previous compliance examination?		
EQUAL CREDIT OPPORTUNITY		
	YES	NO
Does the bank extend credit to customers on the request of dealers or merchants?		
Does the bank use a credit scoring system?		
Does the bank use any risk-based pricing?		

FLOOD INSURANCE		
	YES	NO
Does the bank use a third party for flood hazard determinations?		
Has the bank made any loans secured by improved real property or a mobile home located in a special flood hazard area?		
REAL ESTATE SETTLEMENT PROCEDURES		
	YES	NO
Does the bank make use of escrow accounts for its mortgage loans?		
Is the bank involved in an affiliated business arrangement as defined in RESPA?		
HOME OWNERSHIP COUNSELING		
	YES	NO
Does the bank provide a written notice to homeowners who are delinquent on their home loans?		
If yes, does the notice contain information about available homeownership counseling?		
HOMEOWNERS PROTECTION ACT		
	YES	NO
Has the bank originated residential loans with private mortgage insurance (PMI), either in-house or for sale or referral into the secondary market, since the previous examination?		
PRESERVATION OF CONSUMER'S CLAIMS AND DEFENSES		
	YES	NO
Does the bank purchase any dealer paper (purchase money loans made by dealers)?		
FAIR DEBT COLLECTION PRACTICES		
	YES	NO
Does the bank perform collection services for any defaulted consumer		

debts owed to third parties?		
CONSUMER LEASING		
	YES	NO
Has the bank financed any consumer leases since the previous examination?		
PART III: DEPOSIT COMPLIANCE		
	YES	NO
Has the bank introduced any new deposit products since the previous examination?		
TRUTH IN SAVINGS		
	YES	NO
Has the bank offered merchandise as a bonus or premium for certain deposits?		
Does the bank use the collected balance or the ledger balance method to accrue interest?		
INTEREST ON DEPOSITS		
	YES	NO
Does the bank pay finders or broker fees on deposits?		
ELECTRONIC FUND TRANSFERS (EFT)		
	YES	NO
Has the bank implemented any new EFT services (including electronic check conversion) since the previous examination?		
EXPEDITED FUNDS AVAILABILITY		
	YES	NO
Does the bank place holds on deposited items either on a case-by-case or on an exception basis?		

PART IV: INSURANCE AND INVESTMENTS		
INSURANCE		
	YES	NO
Does the bank, or any other person at an office of the bank or on behalf of the bank, offer insurance (including credit life) or annuities to consumers?		
INVESTMENTS		
	YES	NO
Does the bank directly or through an arrangement with a third party offer investment products (including variable annuities) to retail customers (including cash management sweep accounts and repurchase agreement transactions)?		
Does the bank offer to retail customers repurchase agreements involving U.S. Government or Agency securities held in a custodial capacity to retail customers?		
Is the bank a government securities broker or dealer?		
If no, does the bank hold government securities (itself or through a third party custodian bank) as a fiduciary, custodian or other capacity for retail customers?		

PART V: PRIVACY AND CONSUMER INFORMATION		
RIGHT TO FINANCIAL PRIVACY		
	YES	NO
Has the bank provided any Federal government authority access to the financial records of any consumer (or partnership of 5 or fewer individuals) since the previous examination?		
PRIVACY OF CONSUMER FINANCIAL INFORMATION		
	YES	NO
Does the bank disclose nonpublic personal information about consumers to nonaffiliated third parties to market the bank's own products or services, or to market financial products or services offered pursuant to joint marketing agreements between the bank and another financial institution?		

Does the bank disclose nonpublic personal information to nonaffiliated third parties outside of the exceptions for normal business purposes and joint marketing agreements? (e.g. is an opt-out choice provided to consumers for non-affiliated third party sharing?)		
Does the bank receive nonpublic personal information about consumers from nonaffiliated financial institutions?		
Does the bank disclose, 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?		
FAIR CREDIT REPORTING ACT (FCRA)		
	YES	NO
Does the bank obtain consumer reports for any purpose?		
Does the bank disclose consumer report information to any of its affiliates?		
Does the bank provide an opt-out choice to consumers for the sharing of consumer report information with its affiliates?		
Has the bank used medical information about a consumer in connection with any determination of the consumer's eligibility, or continued eligibility for credit?		
Does the bank obtain consumer reports on prospective or current employees?		

Has the bank obtained and used prescreened consumer reports to offer pre-approved credit or insurance products?		
Do electronic receipts issued by the bank for debit and credit card transactions contain no more than the last 5 digits of the account or card number?		
Does the bank use credit scores when making or arranging mortgage loans?		
Does the bank use credit scores to set terms and conditions of any type of loans? (e.g. rates, fees, or length of repayment term, etc.)		
Does the bank provide information to consumer reporting agencies?		
CHILDREN'S ONLINE PRIVACY PROTECTION		
	YES	NO
Does the bank operate an Internet Web site or online service that collects or could collect or maintain personal information from children online?		
CAN-SPAM		
	YES	NO
Does the bank initiate, either directly or through a third party, e-mail messages whose primary purpose is commercial?		

If yes, has bank management considered the applicability of CAN-SPAM and taken steps to ensure compliance?		
TELEPHONE CONSUMER PROTECTION ACT		
	YES	NO
Does the bank, or a third party on its behalf, engage in any form of telephone solicitation, including through fax machines?		
If yes, has bank management considered the application of TCPA and taken steps to ensure compliance?		

PART VI: ELECTRONIC BANKING		
	YES	NO
Does the bank offer any form of electronic banking?		
Internet banking		
PC banking		
Telephone banking		
Automated loan machines		
Does the bank accept customer inquiries/complaints via electronic mail?		

E-SIGN Act		
	YES	NO
Does the bank allow customers to receive any required account disclosures only in an electronic format?		

PART VII: COMMUNITY REINVESTMENT ACT		
	YES	NO
Has there been any change in the bank's assessment area since the previous CRA evaluation?		
Has the bank opened or closed any branches since the previous examination?		
Does the bank have any CRA Qualified Investments and Services it wants reviewed during the evaluation? (Small Bank Only)		
SECTION 109 – INTERSTATE BANKING AND BRANCHING EFFICIENCY ACT OF 1994 (IBBEA)		
	YES	NO
Has the bank opened any new branches outside of its home state since the previous examination?		
Has the bank or any of its branches been controlled by an out-of-state bank holding company for one year or more since the previous examination?		