

From: albert chu <achu@uobusa.com>
Sent: Tuesday, August 06, 2019 4:08 PM
To: Comments
Subject: [EXTERNAL MESSAGE] RIN 3064-ZA06
Attachments: eipa-flow-chart.pdf; Baisc Banking Q&A (Sample).doc; FDIC Survey.xlsx

Hello,

Attached please find our bank's response to the questionnaire concerning:

FDIC Technical Assistance Offerings and Delivery

if you have any questions, please feel free to e-mail or call me.

Thanks,

Albert Chu
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Technical Assistance Videos

1) The FDIC began issuing technical assistance videos in 2013. The target audience for these videos includes bank directors or bank officers.

a. Have you used any of these technical assistance videos?

Yes

b. If so, describe how you use the videos within your institution.

Selectively for annual training

c. Which have been most helpful to your directors?

IRR, Cyber, BSA

d. Which have been most helpful to management?

Same

2) In the last year, the FDIC changed the format of the videos to voice-over recordings. This format allows the FDIC to update videos more quickly and at a lower cost. The first video issued using this new format is the Bank Secrecy Act video released in December 2018. What are your thoughts on the new format?

None in particular

3) The FDIC's Technical Assistance Video Program provides videos for bank directors (including new directors) and management and staff.

a. Are the topics for each group comprehensive and useful?

Yes

b. Is it more useful for the target audience of these videos to be bank directors, management, or staff?

Yes

c. Would you like to see videos for additional groups (smaller subsets of bank staff, for example)?

Yes

4) The FDIC seeks to provide technical assistance videos on topics that provide the most benefit to community bankers.

a. Of the current videos offered, which do you believe are the most important for the FDIC to retain and continue to maintain and update over time?

See 1 c above

b. Are there any additional videos the FDIC should consider adding to its video program?

Fair Lending, Bitcoin Red Flags
(for AML monitoring)

c. Are there any videos that should be removed from the current Technical Assistance Video Program?

No

Directors' Resource Center

5) Currently, the Directors' Resource Center is organized by product (videos, supervisory guidance, etc.). The FDIC is considering how to improve the Directors' Resource Center. One step underway is moving to a topic-based resource center where significant information regarding a single topic will be located. The Bank Secrecy Act resource page, which was released on May 21, 2019, is the first issuance under this initiative and can be found at <https://www.fdic.gov/regulations/examinations/bsa/>.

a. Do you prefer topic-based resource pages or product-based resource pages? Please explain.

Best to have both, so user can search more easily depending on needs

b. Using the Bank Secrecy Act resource page as an example, please provide feedback on the format of such a topic-based resource center.

c. What suggestions do you have to further improve this format?

Add a timestamp on each item showing date of last change/release to help user realize if the item was recently updated. Also helpful to note the key changes made

d. Are there additional types of information that would be useful to add to such a page?

New Changes (such as any within the past 12 months), Upcoming Changes (e.g. laws & regs), Hyperlinks to Useful Forms

e. Please list additional topics for which the FDIC should develop a resource page.

Cyber security

Director/Banker Colleges

6) The FDIC provides course offerings for bank directors and officers through its Director/Banker College program. These programs are offered locally by the FDIC's six regional offices, and topics are chosen based on the local areas.

- a. Have you attended one of these events in the last two years? No

- b. Do you find these one-day seminars helpful? N/A

- c. Is the length sufficient to meet your needs? N/A

- d. Are there any topics you would like to see addressed? N/A

Teleconferences and Webinars

7) The FDIC hosts teleconferences and webinars to provide timely information to the industry.

a. Are the teleconferences and webinars useful?

Generally Yes

Collect questions & formulate answers in advance & issue Q&A to audience ahead of session would help. At the same time, draw up flow diagrams to help reader visualize and grasp the key points quickly would help not only with training but updating policies & procedures. Attached is an example found on a website illustrating the point (topic being NYS law on protection against garnishment).

b. What would make them more useful?

Fed Protection against Garnishment

c. Please list any topics for which you would like the FDIC to host a teleconference or webinar.

None

d. Provide feedback on the announcement of teleconferences and webinars, including the length of time between the announcement and the event.

e. Should the FDIC establish a regular schedule for teleconferences and webinars with specific topics to be announced closer to the date of the event?

Yes, that will help with planning and avoid clashes with other office events

f. Are the materials provided for teleconferences and webinars helpful?

Generally yes.

g. How can we increase the effectiveness of materials? For example, should audio files and other materials be available after the events and posted on the topic-based resource pages, if applicable?

Training materials often run up many pages and the key points can often be reduced with the use of Q&As & Flow Diagrams. By way of example, see attached Q&A developed internally for NYS Basic Banking Training use.

Community Bank Resource Kit

8) The FDIC created a Community Bank Resource Kit in 2016 that included a reprint of the agency's Pocket Guide for Directors, information on the Technical Assistance Video Program, information on cybersecurity and cyber resources, various reprints of Supervisory Insights articles, and information on other topics. These Kits were provided at FDIC Director/Banker Colleges and sent to each state non-member bank.

a. Have these Kits been useful to your institution? If so, were the Kits more useful to board members or to bank officers and staff?

Yes

b. Would you be interested in an updated Community Bank Resource Kit? If so, what materials or information would you like to see included?

Yes, if major updates had been made over the past 12 months

c. Would you prefer the Kit in print (hard copy), electronic delivery, or both?

E-copy is fine

Regional Compliance Newsletters

9) Each of the FDIC's six regions produces a quarterly consumer compliance newsletter. These regional newsletters are sent via email to all state nonmember banks within the region. The newsletters provide information on FDIC initiatives, updates to regulatory guidance, common examination findings, and other topics.

a. Are these newsletters helpful to your institution?

Yes

In-depth articles are always necessary to a solid understanding of compliance topic, especially those that are technically complicated with lots of changes over time.

A short overview (esp in the form of a flow diagram) would however help provide a glimpse of what the key elements consist of, and put everything in context. So both complement each other.

b. Do you prefer longer, more in-depth articles that address a compliance topic or shorter, briefer articles that provide a quick update?

c. Is there additional information you would like to see addressed in the newsletters?

Would be helpful to receive monthly newsletters mapping out compliance deadline dates on new laws/regs taking effect in coming 12 months

d. Is email an effective delivery method? Why or why not?

Yes

Individual Assistance to Institutions

- 10) How often have you contacted the FDIC in the last year to request technical assistance unrelated to an examination?
In the last five years? Never
- 11) If you requested technical assistance unrelated to an examination, on what topics did you request technical assistance? Did you contact the local field office, the regional office, or the Washington Office for assistance? N/A
- 12) What type of assistance was most effective? What was least effective? N/A
- 13) What steps did you take based on the assistance provided? N/A

Other Items

14) In responding to the questions below, it would be helpful to indicate in rank order, or note preference or priority among, technical assistance offerings that you or your institution find most helpful.

a. Which technical assistance offerings do your board members prefer?

Videos

b. Which technical assistance offerings do your bank officers prefer?

Videos & Webinars

15) What other methods, if any, should the FDIC consider using to provide technical assistance?

Q&As and Flow Diagrams

16) Have you attended training or received technical assistance from another regulator (state or Federal) that was more helpful than that provided by the FDIC? Please explain.

No

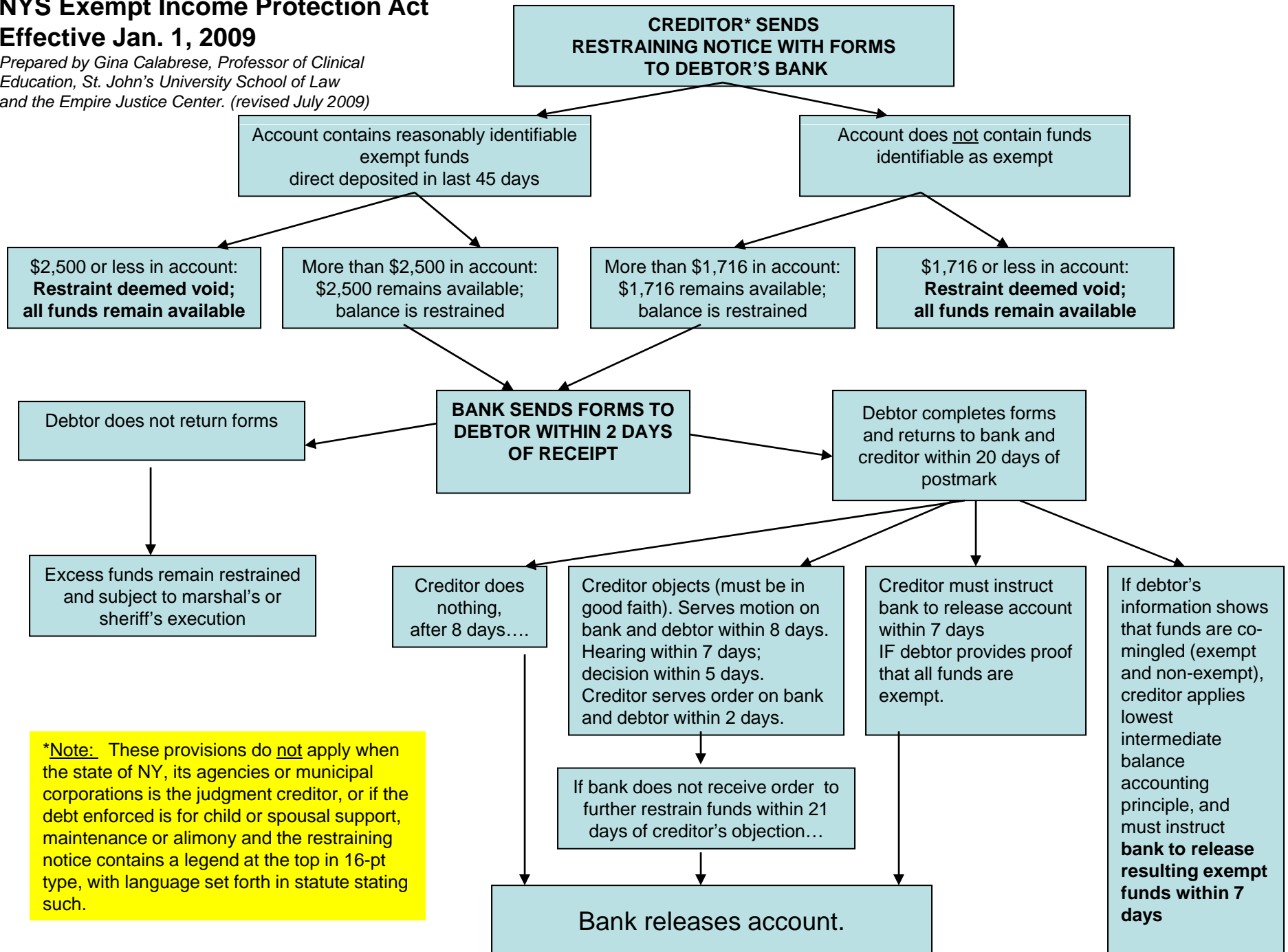
Some web trainings/videos on topics like cyber security that can be found on the internet are quite helpful in that they are less dry (not reading out the requirements line by line but simulating real life scenarios), less technical (esp for an audience such as directors) and often offer food for thought (such as asking questions on how do we address a similar scenario or what is our inherent exposure to a particular risk). Here is a link to one such video which I found helpful and have used for our board & staff training:
<https://www.youtube.com/watch?v=2sh4BiaF6gg>

17) Have you attended training or received technical assistance from a third party that you felt could be provided by the FDIC? Please describe.

NYS Exempt Income Protection Act

Effective Jan. 1, 2009

Prepared by Gina Calabrese, Professor of Clinical Education, St. John's University School of Law and the Empire Justice Center. (revised July 2009)



***Note:** These provisions do not apply when the state of NY, its agencies or municipal corporations is the judgment creditor, or if the debt enforced is for child or spousal support, maintenance or alimony and the restraining notice contains a legend at the top in 16-pt type, with language set forth in statute stating such.

Q & A on “Basic Banking”

Questions	Answers
1. What is the minimum amount of deposit for opening up a checking account?	1. For a regular checking account, the minimum is xxx. However, if certain conditions are met, you may open a “basic banking” account with only \$25.
2. Is there a minimum balance requirement to keep open a “basic banking” account?	2. Yes, one cent.
3. What conditions have to be satisfied before I can open up a “basic banking” account?	3. There are 4 conditions: <ul style="list-style-type: none"> • You must be a New York State resident • You must provide the same info & identification as those who open up “Regular” accounts • You may not keep a transaction account at our bank or any other bank • Your deposits must be made through “direct deposit”, if direct deposit is available to you
4. How much is the monthly fee for a “basic banking” account?	4. \$3
5. Are there any limitations on the number of deposits I can make?	5. No
6. Are there any limitations on the number of withdrawals I can make?	6. Yes. For the 1 st 8 withdrawals every month (by check or ATM), there is no additional charge. From the 9 th withdrawal, there is a yy cents per check charge.
7. I want to open up a “basic banking” account but I have a Regular checking account at another bank. What should I do?	7. You will be allowed 60 days (from the opening of the “basic banking” account) to close the regular checking account
8. How about fees for dishonored items, stopped payments, returned checks, certification of checks, check printing, etc?	8. The same fee charged to regular checking account holders will be charged to you. Please see our Schedule of Fees.
9. Does your bank have a brochure explaining the terms and conditions of a “basic banking” account?	9. Yes. Here is a copy (see attached). We have also posted a copy in the lobby of every branch of ours.