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From: Aron Carter [REDACTED]
Sent: Thursday, August 26, 2021 12:34 PM
To: Comments
Subject: [EXTERNAL MESSAGE] RIN 3064-ZA27

On-site and off-site activities

Question 1: In your experience, what FDIC examination activities have been best adapted to completion on an off-site basis? Please explain, including why these activities are performed best or are most effective using an off-site approach.

The quantitative parts of Safety & Soundness exam due to the fact that quantitative data is fungible on or off-site.

Question 2: In your experience, what FDIC examination activities have not been as well suited to completion on an off-site basis? Please explain, including why these activities are best suited for completion on-site or are most effective using an on-site approach

Any discussion on non-quantitative items are a challenge as questioning techniques are not always the best to get the desired results leaving the bank confused about what documentation is needed to resolve the questions asked.

Question 3: What criteria are useful in determining FDIC examination activities best suited for completion on either an off-site or on-site basis? Please explain.

The quantitative parts of Safety & Soundness exam due to the fact that quantitative data is fungible on or off-site.

Use of technology

Question 4: In your experience, what FDIC technologies used in conjunction with off-site examination activities have worked well? Please explain.

FDIC Connect which we have utilized prior to the pandemic as well.

Question 5: In your experience, what FDIC technologies used in conjunction with off-site examination activities could be improved? Please explain.

Unsure

Question 6: What new or emerging technologies would support additional off-site examination activities? Please explain, including any potential impediments to adoption or deployment.

Unsure

Communication methods

Question 7: What communication methods used during FDIC off-site examinations worked well? Please explain.

Email and phone calls

Question 8: What communication methods used during FDIC off-site examinations could be improved? Please explain.

More clarity in documentation requests over the phone.

Question 9: Should the FDIC continue to use secure email as an alternative to hardcopy mail, including when providing outgoing supervisory correspondence? Please explain.

Yes

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