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Public Comments on Amendments to Deposit Insurance Regulations: Deposit Insurance Coverage Training; SMDIA Notification:=====

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Thank you for the opportunity to comment. While we see the relevance to the proposed rules, certain revisions are suggested, as follows:

- 1) New employees must complete training within 30 days - this should be extended to at least 60 or 90 days since required online training is generally scheduled within this time period.
- 2) Annual training - this is burdensome considering all the other compliance training bank employees receive. A more reasonable period may be every 2 years for refresher training.
- 3) We would like to see that separate vendor FDIC insurance online training will suffice since most third-party companies offer this type of training and our bank employees have taken it previously and are scheduled to during the upcoming year.
- 4) We do not agree that the training should be required for all employees in retail bank offices, especially with the vast number of compliance courses already required (our staff average around 20 hours of compliance training annually).
- 5) Changes are needed regarding ascertaining the insured status. Why should an employee have to inquire as to ownership interest in other accounts when most, if not all, banks can see total account balances within deposit systems? Oral requests should only be required if this information is not available electronically.
- 6) FDIC Deposit Insurance Summary - we provide a ABA FDIC Deposit Insurance Coverage pamphlet to all our customers. This is more informative and we would like to utilize instead of the FDIC page.
- 7) Dedicated Computer for EDIE - NO, we do not have the space and this is a burdensome requirement to small banks.
- 8) Training Confirmation - if we are required to use FDIC's training, we definitely need a tracking system to confirm the training. Employees should not be required to print a confirmation and then staff having to manually track this training.

Thank you for your consideration of these comments.

Sincerely,

Cheryl Nakashige
VP Compliance Officer