

From: Margaret Forte <mforte@countrybankny.com>
Sent: Tuesday, August 06, 2019 3:59 PM
To: Reis, Stacie D.
Cc: Comments
Subject: [EXTERNAL MESSAGE] RIN 3064-ZA06 Country Bank
Attachments: Scanned from a Xerox Multifunction Printer.pdf

Good afternoon Stacie,

At the request of Joe Murphy Jr., please see attached response to the FDIC Technical Assistance; this was forwarded to me for response because I oversee the Bank's Training Program.

Our Bank utilizes 3rd party online trainings for our compliance and regulatory courses and also have in-house training done by me as well as our Compliance Consultant.

Best regards,

Margaret A. Forte, VP
BSA/Compliance Officer
Country Bank
212-818-9090

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COUNTRY BANK

RIN 3064-ZA06

institutions or companies, and other members of the financial services industry. Detailed and specific comments, including whether the commenter prefers one form of assistance or support over another, would be helpful to the FDIC.

In addition to feedback on the FDIC's technical assistance initiatives described above, the FDIC requests input on the following specific topics and questions related to the FDIC's technical assistance:

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? *NO*
- b. If so, describe how you use the videos within your institution.
- c. Which have been most helpful to your directors?
- d. Which have been most helpful to management?

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? *NA*

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

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

- b. Is it more useful for the target audience of these videos to be bank directors, management, or staff?
 - c. Would you like to see videos for additional groups (smaller subsets of bank staff, for example)?
- 4) The FDIC seeks to provide technical assistance videos on topics that provide the most benefit to community bankers. *NA*
- 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?
 - b. Are there any additional videos the FDIC should consider adding to its video program?
 - c. Are there any videos that should be removed from the current Technical Assistance Video Program?

Directors' Resource Center *HAVE NOT USED*

- 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.
- 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?
- d. Are there additional types of information that would be useful to add to such a page?
- e. Please list additional topics for which the FDIC should develop a resource page.

Director/Banker Colleges *HAVE NOT USED*

- 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?
 - b. Do you find these one-day seminars helpful?
 - c. Is the length sufficient to meet your needs?
 - d. Are there any topics you would like to see addressed?

Teleconferences and Webinars

- 7) The FDIC hosts teleconferences and webinars to provide timely information to the industry. *USED ONLY FOR BSA*
 - a. Are the teleconferences and webinars useful? *VERY INFORMATIVE*

- b. What would make them more useful?
- c. Please list any topics for which you would like the FDIC to host a teleconference or webinar.
- 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?
- f. Are the materials provided for teleconferences and webinars helpful?
- 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?

Community Bank Resource Kit *HAVE NOT USED*

- 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?

- b. Would you be interested in an updated Community Bank Resource Kit? If so, what materials or information would you like to see included?
- c. Would you prefer the Kit in print (hard copy), electronic delivery, or both?

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*
- b. Do you prefer longer, more in-depth articles that address a compliance topic or shorter, briefer articles that provide a quick update? *LONGER*
- c. Is there additional information you would like to see addressed in the newsletters? *NOT AT PRESENT*
- d. Is email an effective delivery method? Why or why not? *YES - QUICKEST WAY TO RECEIVE UPDATED INFO*

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? *NOT AT ALL*
- 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?

12) What type of assistance was most effective? What was least effective?

13) What steps did you take based on the assistance provided?

Other Items SEE BELOW

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?

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

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

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.

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

THE BANK'S TRAINING IS FROM A 3RD PARTY PROVIDER COVERING ALL ASPECTS OF COMPLIANCE, BSA AND UPDATES TO REGULATIONS.

Dated at Washington, DC, on June 3, 2019.

Federal Deposit Insurance Corporation.

Valerie Best,
Assistant Executive Secretary.