

November 24th, 2020

Re: Comment on FDIC Statement of Policy Regarding Minority Depository Institutions
[Federal Register 85 FR 60402](#)
RIN 3064-ZA19

Dear Mr. Robert Feldman,

We thank the FDIC for the opportunity to comment and support you in your goal of strengthening and improving the MDI Program.

At OnCourse Learning, we offer education solutions for banking, credit union, and mortgage industries. Our mission is to enable career success and desired learning outcomes through the growth of people and financial services institutions by applying a consultative partnership approach to compliance, licensure, and professional development education. With 40 years of experience and a client base that includes many of today's MDI's and women-owned financial institutions, we know that technology is the key to simplifying management. Financial institutions need flexible learning options in order to be successful.

We propose expanding on the training and educational programs portion of the *Engagement with Minority Depository Institutions* section to specifically include virtual environments and the services of private organizations in order to ensure that these institutions have a wide variety of solutions to meet their needs. Our proposed changes are:

“[...]The FDIC will work with other banking regulatory agencies, ~~and~~ trade associations, ~~and~~ private companies representing minority depository institutions to periodically assess the need for, and provide for, training and educational opportunities. The FDIC will partner with other Federal banking agencies, ~~and~~ trade associations, ~~and~~ private companies to offer training programs. This training and education can be provided ~~in person, through webinars or conference calls, or in a conference setting.~~ by the following training delivery methods:

1. Instructor-Led Training (ILT), including in-person classroom environments and Virtual Instructor-Led Training or Online Instructor-Led environments
2. eLearning environments, including those that are online self-paced
3. Webinars
4. Conferences
5. Conference calls, both phone and video”

Again, we thank the FDIC for considering our comment and look forward to *Investing in the Future of Mission-Driven Banks* and facilitating new partnerships to support and strengthen Minority Depository Institutions. Should you have any questions, please do not hesitate to reach out to me.

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