

**From:** John Greco <jgreco@mvbbanking.com>  
**Sent:** Tuesday, August 06, 2019 4:18 PM  
**To:** Comments  
**Cc:** McIntyre, Lloyd E.; Brad Greathouse; Donald Robinson  
**Subject:** [EXTERNAL MESSAGE] June 7, 2019 - Request for Information on FDIC Technical Assistance Offerings and Delivery; Comment Request (RIN 3064-ZA06)  
**Attachments:** MVB Response to Request for Information on FDIC Technical Assistance Offerings and Delivery 08.06.19.pdf

Good Afternoon,

Please see the attached Request for Information on FDIC Technical Assistance Offerings and Delivery.

Thanks,

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August 6, 2019

**RE:** Response to Request for Information on FDIC Technical Assistance Offerings and Delivery

6714-01-P  
 FEDERAL DEPOSIT INSURANCE CORPORATION  
 RIN 3064-ZA06

**AGENCY:** Federal Deposit Insurance Corporation (FDIC).

**ACTION:** Notice and Request for Information.

**SUMMARY:** The Federal Deposit Insurance Corporation is issuing this request for information to seek public input on additional steps the FDIC could take to support effective management and operation of FDIC-supervised institutions through technical assistance and collaboration on safety and soundness and consumer compliance matters. The FDIC is seeking feedback from community banks, other FDIC-supervised institutions, and other interested parties on existing FDIC methods and efforts to provide technical assistance. The FDIC requests input on strategies to improve the effectiveness of these offerings. The FDIC also seeks comment on both the content and delivery method of various technical assistance offerings and on other steps the FDIC could take to increase the level and effectiveness of technical assistance offered to the industry.

**RESPONSE:**

Questions	Team Member Responses
Technical Assistance Videos 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...	I have not used these videos I have used the technical assistance videos to train directors on Fair Lending Risk. have not used them yes, have reviewed from technical issues such as cecl, liquidating, etc I have only used videos that were part of our required training, but, in general, I find technical assistance videos very helpful. N/A No, I have not used these videos. I have not used them, but would like to understand more about them. the incident response and incident awareness videos have been helpful
Technical Assistance Videos 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...	I have not used these videos Voice Over recordings are OK but not as professional n/a none The new format works well. Hopefully, the cost save helps with the creation of additional videos.



	N/A
	I have not used the videos.
	N/A
	other conferences use a similar format and they feel familiar. no preference toward either, and encourage the low-cost model
<p>Technical Assistance Videos</p> <p>The FDIC's Technical Assistance Video Program provides videos for bank directors (including new directors) and management and staff.</p> <p>a. Are the topics for each group co...</p>	I have not used these videos
	Directors are the best target audience for these videos.
	n/a
	yes, good topics covered
	Yes, these topics are useful. I especially am interested in the Community Reinvestment Act video. I would like additional videos in that area focused on volunteer hours, community development loans and financial literacy.
	N/A
	I have not used the videos.
	I have not used them, but would like to see them.
	NA
<p>Technical Assistance Videos</p> <p>The FDIC seeks to provide technical assistance videos on topics that provide the most benefit to community bankers.</p> <p>a. Of the current videos offered, which do you belie...</p>	I have not used these videos
	CRA and Fair Lending
	n/a
	yes
	Of the current videos, the ones related to compliance and regulatory issues are the most important to maintain. I would add a video on fair lending. I would not remove any videos.
	N/A
	I have not used the videos.
	I have not used them, but would like to see them.
	emerging requirements and areas of focus reach us by way of conferences and engagement with the local team. this would be welcome at a national level also. continued focus on malware, common incident threats, etc. are also very welcome topics
<p>Directors' Resource Center</p> <p>Currently, the Directors' Resource Center is organized by product (videos, supervisory guidance, etc.). The FDIC is considering how to improve the Directors' Resource Ce...</p>	N/A
	I prefer topic based.
	a. topic based pages. b. implement design principles so easier to search and browse
	N/A
	I prefer topic-based resource pages because if I am searching for content on a particular issue, all the resources related to the issue are in one place. There is a lot of good information on the BSA resource page, but there is so much information it is overwhelming. I recommend breaking that content up into multiple pages with a more clear hierarchy and some graphics. I could use a CRA resource page.
	N/A
	I have not used the Directors' Resource Center.
	N/A
	na



<p>Director/Banker Colleges 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 region...</p>	<p>Have not attended</p> <p>I haven't attended.</p> <p>i have not</p> <p>All our directors have attended and really enjoy the sessions</p> <p>I have not attended one of these events yet but would consider it.</p> <p>N/A</p> <p>I have not attended the Director/Banker College program.</p> <p>I have not attended, but would like to know more about them.</p> <p>no - not in the past 2 years</p>
<p>Teleconferences and Webinars The FDIC hosts teleconferences and webinars to provide timely information to the industry. a. Are the teleconferences and webinars useful? b. What would make them more...</p>	<p>I have used these webinars. Generally, the webinars are informative and the provided materials are fine. A schedule would be helpful. Topics to include would be (a) emerging issues (b) areas of examination emphasis, and (c) common examination findings.</p> <p>Teleconferences and webinars are useful.</p> <p>N/A</p> <p>Having taped versions of the webinars are helpful as timing doesn't always work to attend</p> <p>I do like to attend teleconferences and webinars and find them useful. Ideas for additional topics would include fair lending, CRA. A monthly calendar for offerings with reminders would be sufficient. Yes the material is helpful. Yes audio and materials should be available after the events and posted on resource pages.</p> <p>N/A</p> <p>I have not attended FDIC teleconferences or webinars.</p> <p>I would like to understand more about how to get informed about potential changes FDIC guidance.</p> <p>Yes - they are useful. Anything with vendor agnostic content is of interest.</p>
<p>Community Bank Resource Kit 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...</p>	<p>Have not seen this but would like an updated version delivered electronically</p> <p>I would prefer electronic delivery.</p> <p>N/A</p> <p>yes</p> <p>I was not aware these kits existed, but I do believe they would be useful and will check them out. I would be interested in an updated kit and would like it in print and electronic format.</p> <p>N/A</p> <p>I have not used the Community Bank Resource Kit.</p> <p>I have not seen these kits.</p> <p>these have not been utilized</p>
<p>Regional Compliance Newsletters 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 withi...</p>	<p>I find these newsletters useful. I would prefer brief articles with a quick update.</p> <p>The newsletters are very helpful to the bank. Email delivery is fine.</p> <p>N/A</p> <p>yes</p> <p>Yes, the newsletters are helpful. I prefer shorter articles with links to more resources. Email is the most effective delivery method.</p>



	N/A
	I have not received the quarterly consumer compliance newsletter.
	I have not seen these, but would like to.
	these are not a main source of information
Individual Assistance to Institutions How often have you contacted the FDIC in the last year to request technical assistance unrelated to an examination? In the last five years?	2 or 3
	Five or more times.
	Once in last year; 2-3 times in last 5 years
	Last year - 3 times 5 years - 10 times
	I have not contacted the FDIC.
	N/A
	I have not contacted the FDIC in the last year to request technical assistance.
	I personally have not.
Individual Assistance to Institutions If you requested technical assistance unrelated to an examination, on what topics did you request technical assistance? Did you contact the local field office...	2 times
	local office
	I have contacted the local field office numerous times to discuss compliance related issues.
	opinions related to fintech clients. we contact regional office and outside counsel contact washington office for a separate topic
	Local and Regional
	N/A
	N/A
	N/A
Individual Assistance to Institutions What type of assistance was most effective? What was least effective?	I personally have not.
	we requested clarity on emerging technologies and the associated controls
	tech support
	Compliance and Community Reinvestment Act Examinations.
	N/A
	Calls are most effective. Sending letters were least effective
	N/A
	N/A
Individual Assistance to Institutions What steps did you take based on the assistance provided?	N/A
	I personally have not.
	personal communication was used and effective. an email or phone call from the right person solves most of our reasons for engagement
	was able to access FDIC Connect
	The local field office is excellent. I normally implement their suggestions into our process.
	confirmed our monitoring procedures
	N/A
N/A	
N/A	
N/A	



	I personally have not.
	NA
<p>Other Items</p> <p>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 f...</p>	not sure
	I prefer Compliance related technical offerings. Not sure of the Board or other officers of the bank.
	N/A
	Working through management to the regional office
	I don't have enough information to answer this question.
	N/A
	N/A
	N/A
	NA
<p>Other Items</p> <p>What other methods, if any, should the FDIC consider using to provide technical assistance?</p>	Existing methods are fine
	The current offerings are fine.
	N/A
	Research tools similar to public accounting firms
	Podcasts
	N/A
	N/A
	Unknown as I have not yet seen the methods noted above.
N/A	
<p>Other Items</p> <p>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.</p>	No
	The Federal Reserve offers excellent resources, although not better than the FDIC.
	N/A
	no
	No.
	N/A
	No.
	N/A
N/A	
<p>Other Items</p> <p>Have you attended training or received technical assistance from a third party that you felt could be provided by the FDIC? Please describe.</p>	No
	N/A
	N/A
	no
	No.
	N/A
	N/A
	N/A
N/A	