

From: Otero, Mike <Mike.Otero@hancockwhitney.com>
Sent: Tuesday, October 12, 2021 10:34 AM
To: Comments
Cc: Phillips, Ann
Subject: [EXTERNAL MESSAGE] August 12, 2021 - Request for Information on the Federal Deposit Insurance Corporation's Supervisory Approach to Examinations During the Pandemic; Comment Request (RIN 3064-ZA27)

Dear Assistant Executive Secretary:

This letter is Hancock Whitney's response to **RIN 3064-ZA27 - Request for Information (RFI) on the Federal Deposit Insurance Corporation's Supervisory Approach to Examinations During the Pandemic**, published in the Federal Register on August 12, 2021. The RFI was distributed to senior management involved in the exam process for review and commentary. Our comments are outlined below.

On-Site and Off-Site Activities

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.

Due to the ongoing open and communicative relationship we have with our FDIC examiners, we found that the examination process adapted well to an off-site basis. Reviews of supporting materials and information, along with conversations via phone or video conferencing were generally sufficient.

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 or are most effective using an on-site approach.

In general, we found that meetings conducted via video conferencing were much more productive if the exam team utilized the video feature and not just audio alone. This allowed for better communication, exchange of ideas and mutual understanding.

In addition, certain reviews require access to very large files of bank work papers, such as Internal Audit work papers and Corporate Trust files, that pose technology challenges in order to provide remote access to those documents.

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.

Useful criteria would include: the size and accessibility of supporting documents and whether there is a need to save or print bank documents. For larger file reviews or print/save ability, on-site visits may be preferred.

Use of Technology

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

The capability for the bank to upload requested materials/information via FDICconnect into specific designated review folders works very well. FDICconnect is easy to access and navigate.

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

At times, examination teams have encountered difficulty in obtaining and maintaining remote access to systems and materials. This likely results from differing levels of expertise in using remote technology as well as the stability of that technology (i.e. home networks, or inability to sign into video conferencing). While we believe we can accommodate fully off-site examinations, the examiners would benefit from training and from having access to more FDIC technical support to assist them in troubleshooting.

In addition, a consistent method for follow-up requests after a review has begun would be helpful. Currently, requests come through a variety of platforms (secure email, non-secure email, phone call, etc.). A front-line bank associate with limited insight into exam activities may be hesitant to open a secure email link from an unknown examiner. Conversely, if the request is sent via non-secure mail there is a risk of the response being sent via the same non-secured platform. The use of a consistent request process, possibly the utilization of FDICconnect for these requests, would keep the requests in a centralized location for easy access and tracking, ensuring that designated bank staff are receiving the request and are able to monitor that all responses are sent back to the exam team timely.

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

As stated above, we found video conferencing to be very useful but it would be improved by the exam team consistently utilizing the video function in addition to audio.

Zoom is the approved video conferencing system used by Hancock Whitney. It would be helpful if the FDIC could accommodate usage of Zoom across all exam teams.

Communication Methods

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

Utilization of FDICconnect, open lines of communication, and the use of audio conferencing all worked well. Remote meetings allowed for people to join easily from wherever they were and avoid unnecessary travel.

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

As stated above, video conferencing would be improved by the exam team utilizing the video function in addition to audio.

Zoom is the approved video conferencing system used by Hancock Whitney. It would be helpful if the FDIC could accommodate usage of Zoom across all exam teams.

The continuous monitoring exams recently initiated could benefit from a formal results meeting and written communication of results, as opposed to verbal communication.

Exam efficiency would likely improve if examiners would check FDICconnect for uploaded files just prior to making another request.

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

Yes. Sending FDIC communication via FDIC secure email ensures efficient and timely notification and is much preferred over hardcopy mail. An additional alternative could be to utilize FDICconnect to send correspondence.

Thank you for the opportunity to submit comments on this matter. Your examiners are always professional, courteous and work very well with us during review activities and we look forward to continuing the relationship in the same manner. Please contact me if you have any question or comments regarding this response.

Sincerely,

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