90 Day Note

May 2016 Vol. 30, No. 1

A Young & Associates, Inc. Publication

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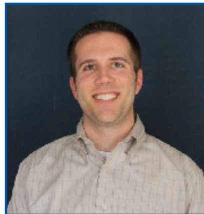
Tommy Troyer Becomes Executive Vice President at Young & Associates, Inc.



Young & Associates, Inc. is pleased to announce that Tommy Troyer has been promoted to the position of Executive Vice President, effective May 1, 2016. With this promotion, Tommy will begin assuming many of the responsibilities of managing corporate operations at Young & Associates, in addition to serving as the head of our lending division. He will also work closely with Gary J. Young, President and CEO, on capital planning, strategic planning, and other management services, and serve on Young & Associates' valuation committee with Martina Dowidchuk and Steve Clinton.

As the head of the company's lending division Tommy will continue to focus on topics related to credit risk management, and will assist clients with loan reviews, ALLL reviews, credit process reviews, and other lending-related services. He will also present seminars and webinars related to credit risk management. Additionally, Tommy will continue to closely follow the CECL (Current Expected Credit Loss) model's impact on ALLL practices at community banks and will provide assistance with understanding CECL and preparing for its implementation.

Tommy joined Young & Associates, Inc. from the Bank Supervision Group at the Federal Reserve Bank of New York, where he focused on credit risk management practices at supervised institutions. His work included a focus on the ALLL, stress testing, and risk monitoring and reporting practices. Prior to his time in bank supervision, Tommy worked in the Federal Reserve Bank of New York's Research Group. Tommy holds a B.A. in Economics from Wittenberg University.

Tommy's professional expertise, relaxed yet detail-oriented management style, and excellent people skills make him the perfect person to maintain the culture at Young & Associates, which is to meet the needs of community banks in a professional and cost-effective manner.

Gary J. Young stated, "We have been fortunate to have Tommy as a member of our team. He has surpassed expectations in everything he has done. He really is stellar professionally and personally. There is no question that he is ready for this advancement at Young & Associates. And, I am convinced there are further advancements to come. I couldn't be more pleased with his promotion. I look forward to working more closely with Tommy."

"I am honored and excited by this opportunity," Tommy said. "Young & Associates has been a successful partner to community banks for over 37 years due to the contributions of many team members and to Gary's leadership. I am pleased to be able to play a role in the continued successful partnership between Young & Associates and our clients and to have the opportunity to learn even more from Gary."

Please join us in congratulating Tommy in his new role at Young & Associates, Inc. He can be reached at ttroyer@younginc.com. ❑

CECL Nears Finalization (For Real This Time)

By: Tommy Troyer, Executive Vice President

Those who have been following the Financial Accounting Standards Board's (FASB) nearly decade-long effort to revamp the accounting rules impacting the recognition of impairment on financial assets (and thus how community banks determine the level of their ALLL) have heard for years that the project was nearing completion. While the project has indeed been moving forward over all these years, the anticipated date of finalization has been repeatedly pushed back. However, this time really is different: on April 27, FASB voted to direct FASB staff to prepare the final draft of the proposed update for a vote by written ballot. FASB hopes for the standard to be formally approved by June 30, but any delays beyond that point should be minimal as FASB has clearly reached a level of comfort with the current draft language.

The new approach to loss recognition is known as the CECL, or Current Expected Credit Loss, model. It represents a significant change to current practices, with the heart of the change being that the ALLL should cover expected lifetime losses on held-to-maturity loans and most other financial assets, rather than simply covering "probable" losses that are deemed to have been "incurred" as of the balance sheet date. In simplified terms, this means that the foundation of the ALLL estimate for community banks will not be an estimate of losses over the next year but will instead be an estimate of all losses expected over the life of the loans held on the balance sheet as of the date of the ALLL calculation. Additionally, the standard requires a forward-looking aspect, as institutions must consider the impact of "reasonable and supportable forecasts" on their loss estimates.

FASB also decided on April 27 to delay the implementation date of CECL by one year from the implementation dates originally determined in November. This means that CECL will need to be implemented in the first fiscal year following December 15, 2019 (2020 for banks with January-December fiscal years) for banks that are "SEC-filers," and in the first fiscal year following December 15, 2020 (2021 for January-December fiscal years) for banks that are not "SEC-filers." Early adoption beginning in the first fiscal year following December 15, 2018 (2019 for January-December fiscal years) is permitted.

> "The methodology and data used to estimate the allowance under CECL will need to be meaningfully different from what banks use today, and as such, preparation to collect data and develop a methodology should begin now."

The Balancing Act: Prepare, but Don't Panic

The proper approach for any community bank is to attempt to find a balance between complacency about CECL and panic about CECL. Complacency about CECL (including believing that the extra year FASB provided before implementation means an additional year before a bank needs to start preparing) will lead to issues down the road. The methodology and data used to estimate the allowance under CECL will need to be meaningfully different from what banks use today, and as such, preparation to collect data and develop a methodology should begin now. Banks should understand that nearly all community banks base their current ALLL methodology on data that measures net charge-off rates on a monthly, quarterly, or annual basis. Such data does not describe lifetime loss rates, however, which is what is needed to comply with CECL's lifetime expected loss standard. Thus, some basic data collection and evaluation efforts should begin now, in part to allow some time to accumulate the data needed by the implementation date.

At the same time that banks recognize the need to begin preparing, they need to also recognize that CECL does not represent any reason to panic. CECL will require some additional work for an effective transition, but it is not an existential threat to any community bank. We believe that some of the most extreme concerns discussed publicly in recent years about CECL and the complexity of approach it might require were overstated, given comments from FASB, financial regulators, and the wording of the 2012 draft Accounting Standards Update. All of these sources emphasized that the approach used by an institution should be appropriate for that institution's size and complexity. However, the most recent draft released by FASB does represent a notable improvement in the clarity with which this fact is communicated: community banks will not be expected to use unduly complex or expensive approaches. Further, it seems that in every opportunity financial regulators have to speak about CECL, they emphasize that they intend to tailor their expectations for approaches to the size and

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complexity of financial institutions. Regulators have also repeatedly noted that they do not believe that a community bank will need to purchase an expensive software solution or vendor model in order to comply with CECL.

The Path Forward

At this point in time, banks have all of the information about CECL that they could need to develop a project plan for the transition. Such a plan should incorporate all relevant areas of the bank (for example, in many community banks the IT area will need to provide support with data gathering and warehousing), and updates on progress should regularly be provided to the board or a committee thereof. Evaluating the adequacy of existing credit risk data and planning to improve its collection and storage should be a high priority. Data should be collected in a way that allows institutions to measure lifetime losses and to understand the most important drivers of risk that impact loss rates.

Young & Associates, Inc. is closely following CECL and what it means for community banks. We have presented and will continue to present educational offerings on CECL through various state banking associations. We are also prepared to provide consulting services to help assist community banks in the preparation process. This can include helping banks understand the types of methodologies that can be acceptable means of estimating lifetime losses under CECL and the types of data that will be needed to support such methodologies.

To discuss CECL further, contact Tommy Troyer at ttroyer@younginc.com or 1.800.525.9775. ❑

Outsourcing Quality Control

High Quality Results at a Lower Cost

By: Debra L. Werschey, Consultant and Manager of Secondary Market Services

With the industry increasingly focusing on quality in the loan origination process, lenders' quality control (QC) programs are more important than ever. Is your QC program effective in meeting Fannie Mae's and Freddie Mac's requirements and mitigating post-purchase risk?

Increasing Industry Regulation

The mortgage industry is struggling with the best ways to incorporate QC processes into a qualified mortgage (QM) world. It's a difficult, ongoing challenge for many lenders, and new regulations make the process even more difficult. To be sure, the market is more regulated today than ever before and, as recent financial history has shown, the trend of increasing regulation is likely to continue.

Fannie Mae and Freddie Mac and other investors are demanding higher loan quality standards from lenders who want to sell loans to them and have announced their intention to get tougher on mortgage lenders regarding loan quality. The risks of non-compliance today are greater than ever. You can help control your risks by outsourcing your quality control.

Benefits of Outsourcing Your QC Reviews

QC reviews allow lenders to correct loan processes, help to mitigate loan file errors that may be discovered by examiners, and provide data upon which solutions can be based. But, maintaining the QC function in-house can be difficult for community banks given the time, staffing, and expertise needed.

Young & Associates, Inc. provides QC services that satisfy regulatory requirements:

- Approved loan file reviews
- Denied file reviews
- Defaulted file reviews

Our strong reputation has been developed through providing quality services, assuring our clients the highest level of professional service available today. We work diligently to keep apprised of the regulatory requirements and, by working with us, you will benefit from our comprehensive and extensive knowledge of the mortgage

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"... shift the QC workload to us and achieve high-quality results at a lower cost ..."

industry. Additionally, by outsourcing your quality control function, you can shift the QC workload to us and achieve high-quality results at a lower cost to the organization.

Organizations with a commitment to quality control recognize that quality begins before an application is taken and continues throughout the entire mortgage origination process. Young & Associates, Inc. has provided education, outsourcing, and a wide variety of consulting services to community financial institutions for over 37 years. We are committed to your bank's future success and look forward to assisting you in order to ensure or enhance that success. Please visit our website, www.younginc.com, to learn more about us or contact me directly at 1.800.525.9775 or dwerschey@younginc.com. ❑

Liquidity Risk Management

By: Martina Dowidchuk, Senior Consultant

Does your liquidity management meet the standards of increased regulatory scrutiny?

What was once deemed acceptable is gradually coming under a more rigid review, and financial institutions need to be prepared to show that their liquidity risk management is keeping pace with the latest changes in funding dynamics and is adequate considering the overall level of risk at the bank.

The liquidity risk may not be among the areas of community banks' immediate concern given the abundance of liquidity in the banking industry today. However, the history shows that liquidity reserves can change quickly and the changes may occur outside of management's control. A bank's liquidity position may be adequate under certain operating environments, yet be insufficient under adverse environments. Adequate liquidity frameworks and governance are considered as important as the bank's liquidity position. While the sophistication of the liquidity measurement tools varies with the bank's complexity and risk profiles, all institutions are expected to have a formal liquidity policy and contingency funding plan that are supported by liquidity cash flow forecast, projected liquidity position analysis, stress testing, and dynamic liquidity metrics customized to match the bank's balance sheets.

Some of the common liquidity risk management pitfalls found during annual independent reviews include:

Cash Flow Plan

- Lack of projected cash flow analysis
- Inconsistencies between liquidity cash flow assumptions and strategic plan/budget
- Lack of documentation supporting liquidity plan assumptions
- Overdependence on outdated static liquidity ratios and lack of forward-looking metrics
- Lack of back-testing of the model

Stress Scenarios

- Stress-testing of projected cash flows not performed
- Stress tests focusing on a single stress event rather than a combination of stress factors
- Stress tests lacking the assessment of a liquidity crisis impact on contingent funding sources
- Insufficient severity of stress tests

Contingency Funding Plan Document

- Contingency funding plan failing to address certain key components, such as the identification of early warning indicators, alternative funding sources, crisis management team, and action plan details
- Lack of metrics defined to assess the adequacy of primary and contingent funding sources in the baseline and stressed scenarios

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Liquidity Policy

- Inadequate risk limits or lack of acceptable levels of funding concentrations defined in the liquidity policy
- Liquidity policy failing to address responsibilities for maintenance of the cash flow model, model documentation, periodic assumption review, and model validation

Management Oversight

- ALCO discussions related to liquidity management not containing sufficient detail and not reflected appropriately in the ALCO meeting minutes
- Lack of periodic testing of the stand-by funding lines
- Lack of liquidity model assumption review or documentation of such review

If you are interested in an independent review of your existing liquidity program and a model validation or are looking for an assistance with developing a contingency funding plan, liquidity cash flow plan, and liquidity stress testing, please contact me at 1.800.525.9775 or mdowidchuk@younginc.com. Young & Associates, Inc. offers an array of liquidity products and services that can help you to ensure compliance with the latest regulatory expectations. ❑

Capital Market Commentary

By: Stephen Clinton, President, Capital Market Securities, Inc.

Market Update - Slow Liftoff

Following its first rate increase in almost a decade in December, the Fed has decided to proceed cautiously on future rate increases. At the Fed's meeting in March, the Fed held rates unchanged. The minutes of the March meeting indicated that there were various opinions as to how quickly interest rates should be increased. It appears that two increases is the most likely scenario this year.

In other economic developments:

- U.S. GDP expanded at a 1.4 percent seasonally adjusted annual rate in the fourth quarter of 2015. This continues the economic recovery that began seven years ago.
- The latest inflation rate for the United States is 1.0 percent for the 12 months ending February 2016. This is well below the Fed's target of 2 percent and gives the Fed latitude to slowly increase interest rates.
- Job creation has been at the forefront of the economic recovery. The Labor Department reported that more Americans were hired to start a new job in February than in any month since before the recession began in 2007. The unemployment rate edged up to 5 percent in March, but that was largely due to more Americans joining the labor force.
- Manufacturing activity remains soft. Weak global growth, low oil prices, and financial volatility were cited as reasons for a decline in orders for durable goods. A bright spot, however, was the U.S. auto industry that recorded its best month of sales in over ten years in March.
- Another indicator of the impact foreign economic growth has had on the U.S. economy was revealed in the decline in U.S. exports. In February, the export activity was 4.2 percent below the level of the prior year. The strong dollar also has impacted exports in that the stronger dollar makes U.S. products more expensive.
- The non-manufacturing sector of the U.S. economy continues to show strength. According to the Institute for Supply Management, non-manufacturing activity rose to 54.5 in March. (A reading above 50 signals expansion.)
- U.S. consumers barely increased their spending in February and spent less in January than the government had estimated earlier. Consumer spending edged up 0.1 percent in February. The government also revised downward its estimate of spending growth in January from a solid 0.5 percent gain to a much weaker 0.1 percent, which matched December's lackluster figure. With consumer spending, which fuels about 70 percent of the economy, off to a weak start in 2016, economic growth

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in the first quarter is anticipated to be weak. Impacting consumer spending is the slow growth in incomes which moved up just 0.2 percent in February.

- Home prices continued rising at a steady clip in January, another sign that 2016 will offer more of the same in the housing market: tight inventory leading to rising prices and sales volatility. The S&P/Case-Shiller Home Price Index, covering the entire nation, rose 5.4 percent in the 12 months ending in January.
- Oil prices have moved up recently. Oil prices remain down more than 20 percent from last year. Most analysts still see the market as over-supplied but some expect that falling U.S. output and rising demand will alleviate some of the glut later this year.

We do expect the economy to strengthen later this year. We anticipate GNP reaching 2 percent for the year as a whole. Job growth remains positive and the dollar's strength has weakened somewhat perhaps aiding export growth. We think home building and home sales will be a positive to the economy and expect the limited supply to cause home prices to continue their upward trend. We agree with the forecast of two rate increases this year, as we expect the Fed to move cautiously.

Interesting Tid Bits

- The GSEs continue to be a source of funding for US government spending. In all, Fannie and Freddie received $187.5 billion from the Treasury but have paid $245.8 billion back in the form of dividends.
- Baby boomers are re-writing the old adage that as you get older you seek to get out of debt. The Federal Reserve reported that the average 65 year old borrower today was reported to have 47 percent more mortgage debt than in 2003. They also have 29 percent more auto debt. Both figures were adjusted for inflation.
- It is projected that this year Americans will use prepaid cards (including gift cards) to a total of $651 billion, an increase of 57 percent from six years ago.
- During the first six weeks of 2016, the KBW Bank Index dropped nearly 23 percent to a three-year low. Over the same period, the Dow Jones Industrial Average fell slightly more than 10 percent over the same period.

Short-term interest rates remain low, with the 3-month T-Bill ending March at 0.21 percent. The 10-year T-Note ended March at 1.78 percent. The yield curve has flattened with the 10-year T-Note falling 49 basis points since December 31, while the three-month T-Bill increased 5 basis points.

The general stock market struggled out of the gate in 2016. As noted above, the market recorded a significant correction in the first six weeks of the year. The market has recovered with the Dow Jones Industrial Index ending March 31 up 1.49 percent for the quarter. This marks a new high for the Dow. The KBW Bank Index ended the March quarter down 12.11 percent. The poor performance of the banking sector is attributable to a variety of concerns, including problem loans surfacing related to the oil industry, continued margin compression issues as interest rates are not rising as quickly as anticipated, and limited growth prospects due to the slow growth of the U.S. economy.

Merger and Acquisition Activity

For the first quarter of 2016, there were 64 bank and thrift announced merger transactions. This compares to 66 deals in the first quarter of 2015. The median price to tangible book for transactions involving bank sellers was 129 percent which is down slightly from 2015's median value.

Capital Market Services

Young & Associates, Inc. has been a resource for banks for over 37 years. Through our affiliate, Capital Market Securities, Inc., we have assisted clients in a variety of capital market transactions. For more information on our capital market services, please contact Stephen Clinton at 1.800.376.8662 or sclinton@younginc.com. ❑

The World of Overdraft

By: Bill Elliott, CRCM, Senior Consultant and Manager of Compliance

For some time now, I have been saying in seminars that the federal government will not rest until there are no overdraft fees. On February 3, 2016, the Consumer Financial Protection Bureau (CFPB) stated that they wish to improve checking account access. They sent a letter to the 25 largest retail banks encouraging them to make available and widely market lower-risk deposit accounts that help consumers avoid overdrafts. Of course, anyone can avoid overdrafts by managing the account properly, but this was not mentioned in the letter.

As a companion item, the CFPB also issued a bulletin warning banks and credit unions that failure to meet accuracy obligations when they report negative account histories to credit reporting companies could result in Bureau action. For the industry, this seems to be of more interest.

The CFPB reminded all banks to "establish and implement reasonable written policies and procedures regarding the accuracy of the deposit account information provided to the consumer reporting companies." Make sure that you can show an accurate and fully functioning system to your examiners at their next visit. This means policies, procedures, and practices to accurately report information and also a system to handle consumer disputes about these issues.

This is not a new requirement – just a reminder of existing requirements. Mistakes do happen, but we need to be very careful with all reports to all types of credit reporting agencies. This is obviously something that the CFPB is going to be pushing very hard. They are all about the consumer, and do not spend much time worrying about the financial services industry. But if we do our jobs correctly, there really is no issue here. If the correct information results in a decline of a deposit account, the consumer will have to deal with the result.

The CFPB is providing consumers with resources to help navigate the deposit account system. CFPB Director Richard Cordray stated, "Consumers should not be sidelined out of the basic banking services they need because of the flaws and limitations in a murky system. People deserve to have more options for access to lower-risk deposit accounts that can better fit their needs." Many bankers would find fault with that statement, as there is a percentage of customers who just cannot manage their checking account. But this seems to be the direction the CFPB is going. Their notice on this issue stated, "the CFPB is weighing what additional consumer protections are necessary for overdraft and related services."

This following section is a direct quote from the CFPB's notice about these issues, and is something that we should keep in mind for the future.

"Screening Accuracy Improvements

The bulletin issued by the CFPB today warns banks and credit unions that they must have systems in place regarding accuracy when they pass on information, such as negative account histories, to checking account reporting or other credit reporting companies. The consumer reporting companies focused on checking accounts typically generate reports on charge-off amounts, past non-sufficient funds activity, unpaid or outstanding bounced checks, overdrafts, involuntary account closures, and fraud.

The CFPB is concerned about inaccuracies and inconsistent information provided by the financial institutions to the reporting companies. In a recent Supervisory Highlights, the CFPB noted that examiners found that one or more financial institutions failed to "establish and implement reasonable written policies and procedures regarding the accuracy of the deposit account information provided to the consumer reporting companies." Examiners also found that at least one entity violated its federal obligation to handle consumer disputes about these issues.

Banks should expect accurate information from checking account reporting companies to make fair assessments of deposit account applicants. If the system is tainted with incomplete, inconsistent, and inaccurate information, banks and credit unions cannot make informed decisions."

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1.800.525.9775

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This is one of the many areas that is concerning the CFPB, which means that it needs to concern us as well. If you need any assistance in this or any other area of compliance, contact us at 1.800.525.9775 or compliance@younginc.com. ❑

Executive Search and Interim Management Services

By: Sharon Jeffries, Human Resources Manager

All financial institutions face changes in management and other key positions from time to time. These changes can be due to retirements, relocations, unsatisfactory work performance, as well as other factors. All of these situations can put your organization in difficult and unique situations that generally cannot be quickly resolved.

Don't rush to fill the vacancy by placing a candidate/current employee in a position that may provide temporary support, but results in a poor fit for the long term, and leaves the employee lacking the skills and experience needed to meet job requirements and expectations.

We Can Help

If you find yourself in this situation, Young & Associates, Inc. can help by becoming an extension of your human resources department. We will work with management and discuss and develop options for your bank to meet both short-term and long-term staffing needs.

If we find that the skill set/experience level desired is such that it will take additional time to source the "right" candidate for the position, we can provide interim solutions, while beginning to search for a candidate that will be a more long-term solution for your organization.

One interim solution may be contracting with Young & Associates, Inc. to put one of our accomplished consultants on-site at your bank to assist in covering those critical areas while continuing the search for a more permanent option. Another option would be for Young & Associates to provide a seasoned individual who may be looking for project and/or short-term work. Through years of experience in the financial services industry, we have developed an extensive network of contacts and resumes of individuals with a broad knowledge base in critical areas that are needed in the industry today.

We can customize the services we offer to meet the ever-changing workforce needs of your financial institution. Although some of what we offer is similar to traditional search firms, several differences set us apart from other firms. Our knowledge of the skills necessary to be successful in the industry today, along with the ability to utilize our in-house experts throughout the process, are key differences. Also, our professional fee structure is generally lower than traditional placement firms. Most importantly, our reputation is proven effective. Young & Associates has been successfully serving community financial institutions for more than 37 years.

We are currently assisting a client overseas with a unique, upper-level management interim staffing need. We have been extremely pleased with the interest level and the quality of the individuals who have expressed an interest in this opportunity, and the willingness to reloacate, even for a limited period of time as this opportunity affords. Please keep us in mind should you need assistance with filling either a short-term or long-term or assignment for your bank.

To learn more about these unique staffing services, contact Sharon Jeffries, Young & Associates, Inc.'s Manager of Human Resources. Sharon has over 26 years of experience in Human Resources Management and can be contacted at sjeffries@younginc.com and/or 1.800.525.9775. ❑

BANKERS WORKING FOR BANKERS
SINCE 1978

Liquidity Cash Flow Planning and Stress Testing Model (#271) - $950

Perform quantitative liquidity assessments as required by *Interagency Guidance on Funding and Liquidity Risk Management*.

- Forecast funding sources, funding needs, and cash flow gaps
- Monitor availability of contingent liquidity
- Monitor funding concentrations and dynamic cash flow ratios
- Perform liquidity stress testing and multiple-scenario what-if analyses

For additional information and to view sample reports for the Liquidity Cash Flow Planning and Stress Testing Model, click here.

Liquidity Contingency Funding Plan (#272) - $275

- Provides a written contingency funding plan as required by *Interagency Guidance on Funding and Liquidity Risk Management*.
- Delineates strategies and actions addressing potential liquidity shortfalls in emergency situations.
- Includes identification of stress events, stress levels, early warning indicators, parameters for liquidity stress testing, sources of funds and funding strategies, lines of responsibility and communication, as well as a detailed crisis action plan.

Liquidity Management Policy (#096) - $175

Customizable policy designed to ensure that the bank is managed to provide an adequate level of liquidity to meet both predicted and unexpected cash needs while maintaining a planned net interest margin.

Liquidity Toolkit (#273) - $1,250

Includes:

- **Liquidity Cash Flow Planning and Stress Testing Model** (#271) - see above
- **Liquidity Contingency Funding Plan** (#272) - see above
- **Liquidity Management Policy** (#096) - see above

Save $150 when you purchase the Liquidity Toolkit

Cybersecurity Assessment Workbook (#310)

Will help you evaluate your institution's Inherent Risk Profile and identify your current Cybersecurity Maturity Level using the FFIEC's Cybersecurity Assessment Tool. Allows you complete the tool and generate the needed summaries for analysis and board reporting.

Inherent Risk Profile: Includes 5 worksheets for the 5 categories of inherent risk identified in the Cybersecurity Assessment Tool. Includes a summary worksheet to identy an Overall Inherent Risk Profile.

Cybersecurity Maturity Level: Includes 5 worksheets for the 5 domains identified by the Cybersecurity Assessment Tool. A summary worksheet for each of the five domains allows the reviewer to identify the maturity level for each domain.

Easy to Use and Understand

All required data entry is completed through the use of simple drop down boxes and provisions are included to allow the reviewer to enter notes and comments as needed throughout the workbook. Colorful summaries simplify analysis and can be included for board reporting.

Capital Planning System

Assess capital adequacy in relation to your bank's overall risk and develop a customized capital plan for maintaining appropriate capital levels in all economic environments.

Allows you to:

Develop a Base Case Scenario in which minimum capital adequacy standards are established.

Identify and Evaluate Risk for Your Bank. Parameters in this analysis have been field-tested in our work with banks over the years and closely resemble adequacy standards established in consent orders.

Stress Test Capital by loan classification (as recommended by the FDIC and OCC)

Perform Contingency Planning for stressed events. All assumptions are stressed to determine the amount of capital needed and possibilities for increasing capital are examined.

Generate Your Capital Plan in as Little as 1 Day! Data from the Excel spreadsheets can be easily transferred directly into a Word document that can be customized to fit the unique circumstances at your bank. Sample language and suggestions for changing the narrative are provided.

First Year License Fee (#304) - $1,095

Update/Annual License (#306) - $495

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