

Practical Solutions

Designed By Bankers For Bankers

Pandemic Policy

Marijuana/Cannabis and MRB Policy

Capital Planning System

Cybersecurity Products

Liquidity Solutions

HMDA Survival Toolkit

A PRODUCT PUBLICATION FROM YOUNG & ASSOCIATES, INC.



Consultants to the Financial Industry

Young & Associates, Inc.
has provided consulting,
outsourcing, and
educational services to community
financial institutions nationwide
and overseas for over 40 years.
We offer a wide array of products
and services covering all the major
areas of banking, such as risk
management, capital planning,
strategic planning, mergers
and acquisitions, internal audit,
branching and expansion, lending
and loan review, information
technology, human resources,
marketing, and regulatory
compliance.

Management

Enterprise Risk Management • Asset/Liability Management
New Bank Charters • Regulatory Enforcement Agreements
Stock Valuations • Interest Rate Risk Reviews
Interim Management • Operations • Marketing
Executive Search & Recruitment • Liquidity Reviews
Backtesting/Validation • Capital Planning
Strategic Planning • Profit Planning • Budgeting
Organizational Planning • Succession Planning

Expansion

New Bank Charters • Branch Market Feasibility Analysis

Internal Audit

Risk Assessments & Audit Plans • Organizing the Audit Function
Internal Audit Outsourcing • Internal Audit Co-Sourcing
Control Reviews

Director Services

Director Succession • Director Development

Information Technology

IT Audit • Vulnerability Assessment/Penetration Testing
Design & Implementation of IT Program
Social Engineering

Regulatory Compliance

Compliance Management Assessment
Compliance Management Review • Compliance Outsourcing
Compliance Risk Assessment Facilitation
Compliance Training • Fair Lending Risk Assessment
Fair Lending Review • UDAP Review
BSA/AML Review • SAFE Act Review • HMDA Review
Virtual Compliance Consultant (VCC)

Lending & Loan Review

Loan Review • CRE and Ag Stress Testing
Commercial, Residential, and Ag Appraisal Review
Loan Portfolio Due Diligence • ALLL Review
Residential Mortgage Quality Control Review • Credit Process Analysis
Customized Credit Training • Problem Loan Workout

Human Resources

Policies & Procedures • HR Audit • Communication & Training
HR Management • Training & Coaching • Sales & Support Materials
Compensation Risk Assessment

Practical Solutions

Designed By Bankers For Bankers



Consultants to the Financial Industry

Young & Associates, Inc.

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- Call toll-free: **1.800.525.9775**

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Capital Planning System First Year License (#304) – \$1,095

Comprehensive tool that allows you to 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. The Capital Planning System has been field-tested by Young & Associates, Inc.'s management consultants and has passed the regulatory scrutiny.

The latest update addresses changes associated with COVID-19, including new recommendations for capital buffers used in the customized minimum capital level calculations, temporary regulatory modifications to the Community Bank Leverage Ratio framework, and changes to the direction of certain risks.

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.

System Requirements: Microsoft® Excel 2007 and Word 2007 and above

Capital Planning System Update/Annual License Renewal (#306) – \$495

Update/Annual License (#306 -- \$495) renews bank license for 1 year and includes any changes or updates to the system that have occurred within the previous year. Also provides suggestions for updating the narrative of your capital plan based on yearly updates.

System Requirements: Microsoft® Excel 2007 and Word 2007 and above

Capital Stress Testing Model (#288) – \$149

A practical risk management tool that will assist bank management and the board in conducting effective, proactive capital planning. Allows you to create useful "what-if" scenarios to determine the impact of unexpected change in net income on the bank's capital level over a three-year period.

System Requirements: Microsoft® Excel 2007 or higher

Saves Time & Effort

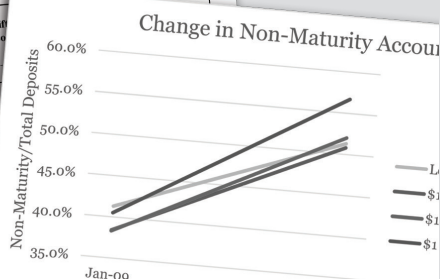
Field-Tested

**Has Passed
Regulatory Scrutiny**

IMPACT OF POTENTIAL DEPOSIT SHIFT IN THE FUTURE

| Simulation | |
|---|----------|
| Potential Loss in Non-Maturity Deposits | \$16,314 |
| Volume \$000 | 27.8% |
| % of Non-Maturity Deposits | 32.6% |
| % of Assets | |
| Length of Projected Deposit Shift | |
| Potential Additional Funding Costs | |
| Income Tax Rate (%) | |
| Potential Additional Funding Costs | |

| Projection Period | Potential Loss in Non-Maturity Deposits |
|-------------------|---|
| Year 1 | \$2,000 |
| Year 2 | \$2,000 |
| Year 3 | \$2,000 |
| Year 4 | \$2,000 |
| Year 5 | \$2,000 |
| Year 6 | \$2,000 |
| Year 7 | \$2,000 |
| Year 8 | \$2,000 |



Non-Maturity Deposit Risk Model (#303) – \$149

When interest rates rise, many banks will see a shift back into certificates of deposits at a higher cost to the bank.

Assess the impact of this potential at your bank.

- Analyzes the increase in non-maturity deposits at your bank
- Estimates the impact on net profit of a shift back into certificates

Used by consultants in the field and addresses current regulator concern regarding interest rate risk.

System Requirements: Microsoft Excel 2007 or higher

Liquidity Risk Management Consulting Support

As a separate service, Young & Associates, Inc. also offers liquidity risk management consulting support, including the assistance with the actual cash flow modeling, determining the assumptions and the stress test parameters, reviewing the results, preparation of the quarterly reports interpreting the results, development of liquidity contingency funding plans, and independent reviews of the existing risk management systems. Contact us today for more details on how we can assist you with your liquidity management needs.

Martina Dowidchuk

Director of Management Services

Direct Line:
330.422.3449

Email:
mdowidchuk@younginc.com

To view and
download sample
reports, click here.

Liquidity Toolkit (#273) – \$1,500

- Streamline your liquidity planning and stress testing process.
- Understand the impact of various business strategies and the potential stress on primary and contingent liquidity, as well as the capital adequacy.
- Generate valuable data-driven insights to support your decision-making (What happens if? What is the “margin of error?” Action plan for the worst case?).
- Ensure regulatory compliance.
- Pay no annual fees.

Includes the following 3 key components:

Liquidity Cash Flow Planning and Stress Testing Model

Dynamic Excel spreadsheet tool designed to assist in performing quantitative liquidity assessments as required by the *Interagency Guidance on Funding and Liquidity Management*. Includes a base-case scenario and four stress scenarios covering a 12-month horizon. Allows for easy what-if modifications to the base-case assumptions to monitor the impact on primary and contingent liquidity.

Over the years, our methodology passed through a number of regulatory exams at our client banks.

Use the model to:

- Forecast funding needs, funding sources, and cash flow gaps over time
- Estimate wholesale funding capacity considering the available collateral and internal policy limits
- Monitor primary and contingent liquidity sources over time
- Perform liquidity stress testing using a combination of stress constraints
- Evaluate the impact of both short-term and prolonged stress events
- Calculate liquidity coverage ratios over time
- Analyze changes in the funding concentrations and other key balance sheet ratios
- Assess the plan's compliance with policy limits/presence of certain early warning indicators
- Create reports

The key questions that can be answered through the cash flow analysis are:

- Are the bank's primary and contingent liquidity reserves adequate?
- Are the projected ratios and the risk levels within the policy limits?
- To what degree is the bank reliant on volatile or credit-sensitive funding sources?

Liquidity Contingency Funding Plan

Provides a written contingency funding plan as required by the *Interagency Guidance on Funding and Liquidity Risk Management*. Delineates strategies and action to address 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

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.

MANAGEMENT TOOLS

Diversity and Inclusion Checklist (#318) – \$85

Organize and review an assessment of current diversity and inclusion efforts relative to the standards by the joint agencies. This gap-analysis tool allows you to identify what is needed to comply with the standards.

Diversity and Inclusion Toolkit (#326) – \$250 *

Includes:

- **Diversity and Inclusion Policy:** Assists a financial institution in defining how it will implement, monitor, and convey their standards in the hiring and promoting of employees and in dealing with suppliers. Includes a policy statement suitable for public sharing.
- **Diversity and Inclusion Checklist** (left)

*** Save \$25 when you purchase the Toolkit!**

For more info and to see
sample summary reports,
go to:

www.younginc.com/cybersecurity

Cybersecurity Assessment Workbook (#310) – \$299

This Excel-based workbook is designed to allow a financial institution to complete the FFIEC's Cybersecurity Assessment Tool in an electronic format that automatically summarizes the results of the data entered to save the institution time while providing accurate documentation for the assessment. The workbook assists in the identification of the Inherent Risk Profile and the evaluation of the financial institution's Cybersecurity Maturity Level for the five domains identified by the FFIEC. Financial institutions should consider completing the cybersecurity assessment annually and prior to offering any new products or services.

System Requirements: Microsoft® Excel 2007 or higher

Social Media Toolkit (#290) – \$445

Provides guidance on how social media will be approached, proper methods for promoting the institution's message and image, and consequences of not following guidelines. Includes Management and User Guidelines for Social Media.

Includes:

- **Social Media Policy with User Guidelines**
- **Social Media Risk Assessment & Audit Checklist**
- **Customizable PowerPoint Training** for managers and users of social media

System Requirements: Microsoft® Word 2007 and PowerPoint 2007

Remote Deposit Capture Toolkit (#260) – \$225

Includes:

- **Remote Deposit Capture (RDC) Customer Checklist**
- **Ongoing Monitoring of RDC Customer Checklist**
- **RDC Risk Assessment:** Microsoft® Excel-based risk assessment that covers both institutions that are offering RDC to their business customers and those institutions that simply have RDC in their branch locations. Covers strategic, operational, reputation, compliance, and legal risks.

System Requirements: Microsoft® Excel 2007 or higher

Audit Tracking System (#269) – \$295

Easy-to-use Microsoft® Access-driven tool that helps institutions track the remediation of exception items from multiple audits/exams so that repeat findings are a thing of the past.

- Track the progress of remediating exception items from recommendation to implementation to remediation testing
- Provide management with easy-to-read reports on new, open, past-due, and closed exception items
- Assign accountability for exception items to individual people or departments
- Receive alerts in Outlook once an estimated implementation date has passed

System Requirements: Microsoft® Access 2007 or higher

To view a short demo of
the product, click here.

Account Auditor for Active Directory (#309) – \$100

Simplify your network operating system user account review process and reduce IT Audit findings with the Account Auditor for Active Directory.

Financial institutions must perform periodic reviews of Network User Access to ensure that it conforms to the institution's policies. The Account Auditor for Active Directory works with your Windows® operating system to export and analyze a list of Active Directory accounts to identify the following:

- Group memberships for each account
- Dormant accounts
- Disabled accounts
- Accounts with passwords that do not expire
- Accounts with passwords that have not been changed within the past year

Includes:

- 1 **Microsoft® Excel Workbook:** Imports and processes the Active Directory information and produces simple, easy-to-understand reports for the reviewer. There's no software to install – the program works with Windows® server operating systems to generate the information quickly and easily.
- 2 **Product Manual:** Explains the process for exporting Active Directory information and using the Account Auditor for Active Directory.

System Requirements: Microsoft® Excel 2007 or higher

Information Security Awareness Training Toolkit (#276) – \$299

Designed to help your bank's Information Security Officer create a customized Information Security Awareness Training Program to educate bank employees on critical information security issues such as:

- Cybersecurity
- Intrusion Response
- Social media
- Acceptable use of IT resources
- Workstation and mobile device security

Includes:

- Training Script (provided in Microsoft Word)
- Customizable PowerPoint Training Presentation

Program Requirements:

Training Script and Slides – Microsoft® Word 2007 and PowerPoint 2007 or higher

Information Security Risk Assessment Toolkit (#270) – \$250

Provides the tools to develop and maintain a comprehensive Information Security Risk Assessment.

Includes:

- **Information Security Risk Assessment Questionnaire** to gather information about media containing non-public information from each department
- **Information Security Risk Assessment Workbook**
- **Customizable Information Security Risk Assessment Policy**

System Requirements: Microsoft® Excel 2007 and Word 2007

Cybersecurity

Intrusion Response

Social media

Acceptable use of IT
resources

Workstation and mobile
device security

To view a short demo of
the product, click here.

MANAGEMENT TOOLS

Ensure the safety
and soundness of
your bank's critical
vendors

Vendor Risk Management Policy (#213) – \$325

Provides guidance on managing the risks that may arise from outsourced relationships, including responsibilities, risk assessment, due diligence, contracts, security and confidentiality, controls, business resumption, and monitoring.

Vendor Risk Management Workbook (#265) – \$275

Perform and document scheduled reviews of critical vendors that have access to non-public information.

- Monitors financial condition, contract/vendor background, controls, performance, and business continuity of your bank's critical vendors
- Provides a centralized location for storing all vendor reviews
- Provides an easy-to-use way to document your vendors' safety and soundness to your board and examiners

Includes:

- **Easy-to-use Microsoft® Excel spreadsheet** to maintain all vendor reviews
- **Easy-to-understand instructions** for completing the worksheet

System Requirements: Microsoft® Excel 2007 or higher

SSAE-16 Review Checklist (#305) – \$125

As part of its vendor review process, your bank must conduct an SSAE-16 review for applicable vendors to gauge the controls in place to protect the confidentiality, availability, and integrity of data and processing capabilities. The SSAE-16 Checklist will assist your bank with its SSAE-16 review by providing a list of items to evaluate for each SSAE-16, a method for risk rating the results, and documentation to attach with the overall vendor review.

Includes:

- **Customizable SSAE-16 Checklist**
- **Customizable SSAE-16 Control Review**
- **SSAE-16 User Guide**

System Requirements: Microsoft Excel 2007 or higher and Word 2007 or higher

Vendor Risk Management Toolkit (#312) – \$595

Contains all the necessary pieces to successfully manage the risk associated with your vendors.

Includes:

- **Customizable Vendor Risk Management Policy** (left)
- **SSAE-16 Review Checklist** (above)
- **Vendor Risk Management Workbook** (above)

System Requirements: Microsoft Excel 2007 or higher and Word 2007 or higher

Threat Intelligence Program (#324) – \$299

Includes:

- **Threat Intelligence Program:** Documents the requirements for the institution's threat intelligence program, including: threat intelligence sources, the monitoring process, the analysis and response process, documentation requirements, and the reporting process
- **Threat Tracking Summary Worksheet:** Microsoft® Excel-based workbook for tracking threat notifications and responses
- **Threat Tracking Detail Worksheet:** Microsoft Word-based worksheet for tracking details about the threat analysis and response process performed for each specific threat
- **Information Systems Event Management Policy:** Policy template that documents the requirements for information systems event management procedures
- **Event Management Procedures for Specific Systems Worksheet:** Excel-based workbook for documenting the event management procedures for each information system

System Requirements: Microsoft® Excel 2007 and Word 2007 or higher

Loan Portfolio STRESS Testing

**Commercial Real Estate (CRE)/
Commercial Loan Stress Testing Model (#258) – \$895**

Consumer Real Estate/HELOC Stress Testing Model (#256) – \$425

Allow you to:

- Perform a risk assessment of higher-risk segments of the bank's portfolio
- Create support documents for ALLL analysis as it pertains to credit risk management
- Determine the risk potential and pricing adequacy during loan approval
- Stress test using multiple stress-test scenarios (e.g., loan grades, loan-to-value, debt service coverage, net operating income)

Each Stress Testing Model Includes:

- **Easy-to-use Microsoft® Excel spreadsheet** to complete the required stress tests. Most information can be downloaded from the bank's mainframe, eliminating the need to enter all data manually.
- **Easy-to-understand instructions** that explain the importance of stress testing to the bank's overall risk assessment of portfolios and help establish concentration limits and capital adequacy determinations.

System Requirements: Microsoft® Excel 2007 or higher

To view an online
demo, click here.

Need Assistance?

If you prefer, Young & Associates, Inc. can complete the stress testing of your loan portfolios for you, and will provide a complete analysis of the results. For more information on our stress testing service and pricing structure, please contact us at lending@younginc.com.

PFS Calculator (#254) – \$79 *

Automated and Self-Calculating Personal Financial Statement

Easy-to-use, automated method of collecting personal financial information from borrowers

- Saves time and effort
- Standardizes submission of personal financial information from borrowers
- Can be customized to show multiple branch locations
- Unlimited use – File can be used and distributed to borrowers again and again
- Ensures accuracy of calculations
- Easy to interpret and update

System Requirements: Microsoft® Excel 2007 or higher

***One-time license fee for unlimited use**

For more detailed
information and
to view snapshots
and output,
click here.

LENDING TOOLS

TILA/RESPA Integrated Disclosure Toolkit (#311) – \$495

Provides the tools needed to eliminate the guess-work and ensure compliance with the highly-detailed and complex Integrated Disclosure requirements.

Includes:

- **Integrated Disclosure Review Model:** Ensure compliance with the Integrated Disclosure requirements and automatically generate your Compliance Review Report. Covers all the requirements of the rules. Includes a line-by-line review of the Loan Estimate and Closing Disclosure, along with Commentary.
- **Integrated Disclosure Policy:** Ensure your policy is up-to-date and in compliance with the Integrated Disclosure rules. Fully customizable for the unique circumstances of your institution.
- **Integrated Disclosure User's Guide:** An easy-to-use summary of the Integrated Disclosure requirements.

System Requirements: Microsoft® Excel 2007 and Word 2007 or above

Basic Lending for Community Banks (#314) – \$395

Training manual for beginning lenders, lending support staff, or for experienced lenders looking for a refresher or reference materials. Topics include rules and regulatory guidelines, credit risk management program, basic credit underwriting guidelines, and the commercial lending process.

Understanding and Reading Financial Statements (#315) – \$395

Training manual to help employees either new to the lending function or those assuming new duties such as credit analyst. Topics include reading financial statements, gaining better understanding of the balance sheet and income statement, and reading additional financial statements that may be provided.

Financial Statements Analysis for the Community Bank Credit Analyst (#316) – \$395

Training manual geared to the Credit Analyst at your institution. Topics include an overview of financial statements, analyzing repayment ability, liquidity and capital analysis, profitability, financial ratio analysis, and writing a narrative of findings.

Community Bank Credit Analyst Manuals (3 manual series) (#317) – \$1,095

Save \$90 when you purchase our set of training manuals geared to the credit analyst at your institution. Set includes Basic Lending for Community Bankers, Understanding and Reading Financial Statements, and Financial Statement Analysis for the Community Bank Credit Analyst.

Fair Lending Management System Toolkit (#302) – \$495

Packed full of practical and easy-to-use tools, the *Fair Lending Management System Toolkit* provides everything you need to ensure your bank understands and complies with the fair lending laws and regulations.

Includes:

- **Management System Guide and Appendix:** Covers types of lending discrimination, review scope guidelines, compliance management review, fair lending sample size tables, and more. Includes a complete Appendix for implementation of your Fair Lending Management System.
- **Three (3) Management Review Models:**
 1. Compliance Management Analysis Model
 2. Audit Function and Self-Test/Self-Evaluation
 3. Streamlined Fair Lending Review Model: Automatically generates your compliance review report.
- **Matched Pair Review Model:** Perform comparative file analysis to determine discriminatory patterns.
- **Three (3) Potential Disparate Treatment Models:**
 1. Policy Exceptions Model
 2. Pricing Review Model
 3. Denial Review Model
- **Pricing and Matched Pair/Denial Review Report Templates**
- **PowerPoint Training:** Ensure the necessary fair lending training for your staff. Can be customized for your bank.

System Requirements: Microsoft® Word 2007 and PowerPoint 2007, and Microsoft Windows 7 or higher

**Fair Lending
Management
System Toolkit
with Customizable
Fair Lending Policy
- \$725**

(Save \$120!)

*For Fair Lending policy
description, see page 18.*

Regulation E: International Fund Transfer Compliance Toolkit (#296) – \$495

Everything you need to ensure compliance with the IFT regulation.

Includes:

- **Customizable International Remittance Transfer Policy:** Can be customized for your bank.
- **IFT Compliance Guide:** An easy-to-use summary of the remittance transfer rule.
- **Model Forms:** Appendix A
- **Compliance Guide PowerPoint Training Tool:** Provide the necessary training for your tellers, agents, and customer representatives, as well as back office staff that approve, process, and monitor transactions. Can be customized for your bank.
- **Compliance Review Model:** Microsoft® Excel-based format. Ensure complete compliance with the rule requirements.
- **Error Resolution Worksheet**
- **Error Resolution Log:** Track and ensure compliance with the rule's error resolution requirements.
- **Report Template:** Covers Transaction Testing Scope, IFT Findings Grid, Assigned Priority Classifications for any and all possible IFT Findings / Violations, Disclosure Obligations, Cancellation - Refund and Error Resolution Rights, Training Requirements

System Requirements: Microsoft® Word 2007 and PowerPoint 2007, and Microsoft Windows 7 or higher

HMDA Survival Toolkit (#294) – \$595

The revised HMDA rule, effective January 1, 2018, requires collection and validation of a significant amount of additional data for HMDA reporting, making this process much more time consuming and complex. The HMDA Survival Toolkit, designed specifically for community banks, can help.

Ensure that your bank's HMDA data is accurate prior to submission and that bank policies and procedures comply with the January 2018 requirements, as well as the September 2018 Interpretive and Procedural Rule.

Includes:

- **2018 HMDA Survival Guide:** A consolidation of the 2015 Final Rule, 2017 amendments, September 2018 Interpretive and Procedural Rule, and the Official Commentary
- **Customizable HMDA Policy:** Updated to incorporate the new requirements effective January 1, 2018, including the partial exemptions effective September 2018.
- **HMDA PowerPoint Presentation:** Designed to train staff on the new HMDA requirements – customize to fit your bank's HMDA process
- **Data Integrity:** Includes the banking agencies' transaction testing guidelines and designated key data fields
- **Compliance Review Model:** Excel spreadsheet designed to facilitate a review of your compliance with the new HMDA requirements
- **Sample HMDA Review Report Template:** Document your compliance review with this report template – edit to include the review scope, relevant findings, and recommendations regarding data integrity, as well as disclosure and notice requirements
- **Reference Guide:** Provides links to CFPB's resources for HMDA filers and other agency information

System Requirements: *Microsoft® Excel 2007 and Word 2007 or higher*

Complete CTR and SAR Instruction Toolkit (#291) – \$495

Provides the tools your BSA Officer needs to understand the guidance, complete and submit the new electronic forms, and train bank staff and the board.

Includes:

- **New CTR and SAR Instruction Manuals:** Cover the requirements, data fields, and terminology and provide step-by-step instruction on how to complete the forms. Include completion examples/scenarios to clarify the various situations that might apply at your bank.
- **Filing FinCEN's New CTR and SAR Guidance** (Department of the Treasury)
- **Forms:** CTR Form 112 and SAR Form 111 in fillable .pdf format. Great training tools!
- **CTR and SAR Completion Compliance Review Models:** Convenient checklist format. Ensure the accuracy of your submissions.
- **BSA/AML Regulatory Training Requirements:** Comprehensive training for bank staff and the board.
- **CTR/SAR PowerPoint Training Presentation:** Train bank staff and your board. Can be customized for your bank.

System Requirements: *Microsoft® Word 2007 and PowerPoint 2007, and Microsoft Windows 7 or higher*

COMPLIANCE TOOLS

SCRA Compliance Management Toolkit (#299) – \$375

Ensure your bank understands and is in full compliance with SCRA.

Covers:

- Limits • Prohibitions • Waivers • Special circumstances (such as eviction, property purchases, mortgages, and leases) • Latest SCRA foreclosure protections, mortgage servicing practices with permanent change of station order/PCS, and revised disclosure notice

Includes:

- Customizable SCRA Policy and Notice Disclosure
- SCRA Compliance Review Objectives/Instructions: For use with the SCRA Compliance Review Procedures and the SCRA Compliance Review Model (see below).
- SCRA Regulatory Compliance Review Procedures
- SCRA Compliance Review Model with Report Format: Automatically generates your compliance review report! Covers all the requirements, along with transaction testing.
- SCRA PowerPoint Training: Ensure the necessary SCRA training for your staff!

System Requirements: Microsoft® Word 2007 and PowerPoint 2007, and Microsoft Windows 7 or higher

UDAAP Compliance Management System Toolkit (#300) – \$495

Develop a complete compliance management system for UDAAP.

Includes:

1. Customizable UDAAP Policy and Procedures: Includes a UDAAP Risk Assessment and a Complaint Management System, complete with Consumer Complaint Procedures covering Red Flags, Complaint Analysis, Substantive Complaints, Regulatory References, and a Complaint Management Worksheet.
2. UDAAP Compliance Review Procedures
3. UDAAP Forms: Includes Consumer Complaint Form, Complaint Management Worksheet, and Complaint Management Log.
4. UDAAP PowerPoint Training: Ensure the necessary UDAAP training for your staff.
5. UDAAP Compliance Review Model with Report Format: Automatically generates your Compliance Review Report!

System Requirements: Microsoft® Word 2007 and PowerPoint 2007, and Microsoft Windows 7 or higher

AML FinCEN Form 8300 Toolkit (#297) – \$325

Everything your bank needs to understand, complete, and provide training on the FinCEN Form 8300: Reports of Cash Payments Over \$10,000 Received in a Trade or Business.

Includes:

1. FinCEN Form 8300 Instructions and Definitions Manual / Report of Cash Payments over \$10,000 Received in a Trade or Business Instruction Manual
2. FinCEN Form 8300 Completion Instructions: Covers the new requirements, data fields, and terminology, and provides step-by-step instruction on how to complete the form.
3. FinCEN Form 8300: Provided in an easy-to-use, fill-able .pdf format. An excellent training tool!
4. Customizable AML Policy: Covers AML programs and procedures, required reports, and record-keeping.
5. FinCEN Form 8300 Compliance Review Model: Convenient checklist format
6. FinCEN Form 8300 Completion PowerPoint Training: Train personnel on the FinCEN requirements.
7. Rights to Provide Your Business Customers With the Necessary Components (Items 1 - 3 listed above)

System Requirements: Microsoft® Word 2007 and PowerPoint 2007, and Microsoft Windows 7 or higher

AML FinCEN Form 8300 – Toolkit for Business Customers (#298)* – \$125

* Customer Components Only (Items 1 - 3 above)



COMPLIANCE TOOLS

SAFE Act

Toolkit

SAFE Act Toolkit (#285) – \$375

Take the necessary steps to complete all of the required SAFE Act steps – employee training, policy and procedures development, and establishment and implementation of audit plans.

Includes:

- Customizable SAFE Act Policy
- Training Manual
- Implementation Checklist
- Audit Checklist
- Sample Procedures
- Sample Data Collection and Recordkeeping Forms

System Requirements: Microsoft® Excel 2007 and Word 2007 or higher

Reg O Toolkit (#264) – \$295

Provides an easy-to-use, automated method to perform your bank's Reg O - Loans to Insiders review at both the customer and bank/aggregate level and generates reports to document compliance.

Includes:

- **Compliance Checklist:** Automated checklist will allow the compliance officer/committee to conduct a thorough Reg O review. Generates reports for compliance documentation and covers regulatory items and best practices.
- **Reg O Workbook:** Microsoft® Excel-driven spreadsheet that calculates your bank's maximum amount of Reg O loans, and assures that all individuals and their related interests are within proper tolerances. Generates a Regulation O Summary for review by auditors, management, and the board of directors.
- **Training Manual:** Designed for all levels at the bank, this easy-to-follow training tool takes you step by step through the regulation and covers definitions, extensions of credit, aggregate and individual lending limits, overdrafts, limits for executive officers, general prohibitions, recordkeeping, reporting and disclosures, civil penalties, and a special appendix for national banks.
- Customizable Reg O Policy

System Requirements: Microsoft® Excel 2007 or higher and Word 2007

Reg GG Toolkit (#262) – \$295

Unlawful Internet Gambling Toolkit

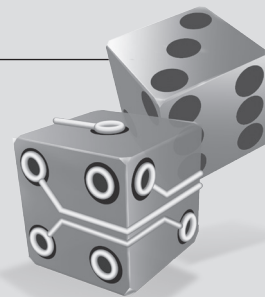
Includes:

- Customizable Reg GG Policy
- Training Manual
- Compliance Monitoring Checklist (provided in Microsoft® Excel)

Covers:

Payment Systems (ACH, Credit/Debit Cards, Checks, Wire Transfers, Money Transmitting Systems) • Exemptions • Reliance on Payment Systems Policy and Procedures • Risk-Rating Commercial Deposit Customers • Due Diligence Requirements • Certifications from Commercial Deposit Customers • Third-Party Certifications • Reasoned Legal Opinions • Identifying/Blocking Transactions • Requirement to Give Notice

System Requirements: Microsoft® Excel 2007 and Word 2007



COMPLIANCE TOOLS

Red Flag Identity Theft Toolkit (#249) – \$395

Develop and implement a comprehensive identity theft program for your bank.

Includes:

- Identity Theft Risk Assessment Workbook in Microsoft® Excel (interactive risk rating templates)
- Implementation Checklist
- Customizable Identity Theft Policy
- Training Manual that can be customized to meet the unique needs of your bank

System Requirements: Microsoft® Excel 2007 and Word 2007

Compliance Management Profile Risk Assessment Workbook (#244) – \$345

This easy-to-use tool will provide a structured method for evaluating your bank's compliance management program, as well as a better understanding of where your compliance efforts are paying off and/or what areas demand more attention. Covers compliance management from a global/overall perspective as well as by regulation. Includes workbook and 28 interactive risk rating templates.

System Requirements: Microsoft® Word 2007 or higher

Bank Secrecy Act/Anti-Money Laundering Risk Assessment Development Workbook (#238) – \$295

- Complete your bank's overall BSA/AML risk assessment in accordance with the FFIEC's examination procedures expectations.
- Guides you step by step through the determining factors, such as bank size and structure, geographic locations, customers and entities, operations, and products and services. A prerequisite to completing the risk assessment is performing customer due diligence to determine those customers or customer types that involve higher BSA/AML risks.

System Requirements: Microsoft® Word 2007



Compliance Update

Developed by Bankers for Bankers

DST Schedule Change and Compliance

by Alan Haskell, AAP, Consultant

There is a change pending in the schedule for Daylight Savings Time (DST). This compliance advisory is intended to alert community banks to possible special compliance risks associated with failure to prepare for this change.

The impetus for this advisory is that the schedule for DST this year will be changed so that DST begins earlier and ends later. The Energy Policy Act of 2005, signed into law August 2005, moves the beginning of DST to the second Sunday in March (previously the first Sunday in April). The ending of DST will be the first Sunday in November (previously the last Sunday in October).



Compliance Impact

Without advance preparation, your bank may experience incorrect times on ATM disclosures (Regulation E compliance) and possibly cause malfunctioning of ATM compliance systems (Bank Protection Act). Deposit cutoff times of the bank other than the core data may be affected and considered controlling.

bank management should have a plan to mitigate risks associated with this time change.

They state that bank management should also consider the following actions to ensure readiness for the new start of DST:

- Review and verify modifications necessary for all important systems, servers, applications, and...

Compliance Update Newsletter (#018) – \$249

Annual Subscription

Monthly newsletter that provides a thorough compliance review and covers developments that affect the banking industry.

Packed with useful compliance information:

- **Action Items:** Includes a follow-up checklist
- **Feature Articles:** Analyze the issues, written by compliance people for compliance people
- **What's Hot:** Covers proposed rules, new laws, and what they mean for your bank
- **Reg Watch:** Keeps you posted on what's looming on the horizon
- **Q&A:** Provides answers to your questions on compliance issues
- **Compliance Calendar:** Keeps you up-to-date with deadlines at a glance

Provided to you in .pdf format, your Compliance Update will be sent to you via e-mail each month.

Bank Policies



Financial Policy

Proven Effective • Cost-Effective • Fully Customizable • Easy to Use • Updated Regularly

***Accuracy and Integrity of Furnished Information* (#282) – \$95**

Will assure that the bank is furnishing accurate information to consumer reporting agencies, including identifying the appropriate accounts and other relationships and the appropriate consumer(s).

***ADA General Accessibility* (#328) – \$130**

Describes the bank's intention to ensure that its services are accessible and accommodating to individuals with disabilities. Includes a policy statement; roles and responsibilities of bank board, executives, committees, and employees; grievance processes; and contact for inquiries, questions, assistance, and general information.

***ADA Website Accessibility* (#327) – \$130**

Addresses the need of the bank's website to provide equal treatment to all its customers and the public under Title II of the ADA, the Rehabilitation Act of 1973, and Department of Justice (DOJ) web accessibility directives in accordance with Web Content Accessibility Guideline (WCAG) 2.0 Level AA and the United States Access Board's Section 508 Standards. Includes a policy statement which is suitable for public documents; policy application; roles and responsibilities; complaint process for improving accessibility and accommodations; and contact for inquiries, questions, assistance, and general information.

***Agricultural Lending* (#076) – \$255**

Establishes the parameters and structure covering agricultural lending, including interest rates, pricing of loans, lending limits, and credit criteria.

***Allowance for Loan and Lease Loss and Reserve* (#077) – \$275**

Addresses the bank's responsibilities to monitor its portfolio for adequate ALLL, including methodology, portfolio analysis, and examination guidelines.

***Appraisals and Evaluations* (#124) – \$275**

Covers: Appraiser and Evaluator Qualifications and Selection, Engagement Letters, Appraisals From Other Financial Institutions (including purchased participations), Third Party Arrangements, Useful Life of Appraisals, Appraiser/Evaluator/Lending Staff Independence, Appraisal/Evaluation Review, Appraisal Audits for Loans Sold on the Secondary Market, Reappraisals or Reevaluations of Collateral and Representations and Warranties.

***Bank Owned Life Insurance (BOLI)* (#234) – \$300**

Identifies risks inherent in the acquisition, retention, and use of BOLI.

***Bank Secrecy and Anti-Money Laundering* (#109) – \$360**

Includes information on exempt persons, internal records, currency transaction reports, Office of Foreign Assets Control, Customer Identification Program and Customer Due Diligence, wire transfers, anti-money laundering, and USA Patriot Act provisions.

***Bank Security* (#214) – \$250**

Provides the requirements of the regulatory agencies and covers all aspects of bank security.

***Board of Directors* (#100) – \$310**

Designed to assist the board in recognizing and carrying out its duties and responsibilities for overall direction of the bank.

***Branch Closing* (#092) – \$225**

Sets forth the procedures required by the regulatory agencies to close a branch office, including profit analysis and availability of services. Includes sample regulatory and customer notifications.

***Business and Travel Expense* (#089) – \$200**

Defines the general types of expenses the bank will incur, establishes the budgeting and operational procedures needed to implement the policy, and provides policy guidelines for travel and entertainment.

***Capital, Earnings and Dividend* (#102) – \$250**

Provides a clear outline of the bank's goals and parameters for maintaining an adequate capital base, and states how the payment of dividends relates to those goals and parameters.

***Charitable Contributions* (#086) – \$205**

Establishes the types of contributions the bank will grant and sets forth the budgeting and operational procedures needed to implement the policy.

Bank Policies continued on page 17 ➞

POLICY DEVELOPMENT

Check 21 (#227) – \$195

Describes the responsibilities of the bank for disclosing to customers the Check 21 requirements.

Code of Conduct and Ethics Program (#101) – \$265

Guides compliance with the Bank Bribery Act. Sets forth the basic policies of ethical conduct, the foundation of basic business standards, and personal conduct.

Collection, Workout, Charge-Off and Recovery (#078) – \$355

Establishes the bank's responsibilities to manage lending risks. Includes the Loan Workout requirements bank examiners will be looking for.

Note: If your bank's collection policy is current except for the Loan Workout requirements, you can purchase the Loan Workout Policy (see page 19) separately and append it to your current policy.

Commercial Lending (#079) – \$255

Covers commercial/business loans, including credit types, interest rates, pricing, borrower information requirements, legal lending limits, credit criteria, collateral, documentation, credit structure, and financial statement requirements.

Community Reinvestment Act (#120) – \$215

Sets the tone for Community Reinvestment Act compliance, whether by strategic plan or lending, investment, or service tests. Includes information on delineation of assessment area, performance standards, performance evaluation, data collection, reporting, disclosures, and public file.

Compliance Management (#104) – \$230

Demonstrates how your bank will comply with the banking compliance regulations. Provides information on compliance officer and compliance council responsibilities, monitoring and control, and compliance risk ratings. Includes a risk ratings flow chart.

Consumer Lending (#080) – \$255

Establishes standards for individual credit decisions such as anti-discrimination, credit criteria, credit documentation, regulatory requirements, loan types, and exceptions.

Contingency Planning (#072) – \$225

Designed to provide a risk management plan to avoid potential losses. Includes policy implementation, bank security, emergency procedures, back-up sites, loss prevention, liquidity, insurance policies, asset protection, and risk management training.

Credit (#074) – \$360

Addresses the composition and control of the loan portfolio as a whole, and establishes standards for individual credit decisions.

Cross Selling of Products and Services (#203) – \$350

May be used as a freestanding policy or incorporated into your bank's broader-coverage marketing policy. Covers responsibilities for administering and overseeing the cross-selling program, participation and involvement, access and use of customer data for prospecting, compensation and incentives, elements for effective training and coaching, and quality assurance.

Customer Identification Program (#217) – \$195

Covers the basis for the CIP procedures, including Customer Due Diligence, definitions, procedures for verification through documents, non-documentary verification, lack of verification, and other items, such as when not to open the account, limited use of account, when the account will be closed, when additional information is required, record keeping, comparison with government lists, customer notice, and reliance on another financial institution.

Cybersecurity (#313) – \$200

Covers the basis for the CIP procedures, definitions, procedures for verification through documents, non-documentary verification, lack of verification, and other items, such as when not to open the account, limited use of account, when the account will be closed, when additional information is required, record keeping, comparison with government lists, customer notice, and reliance on another financial institution.

Direct Dispute (#281) – \$95

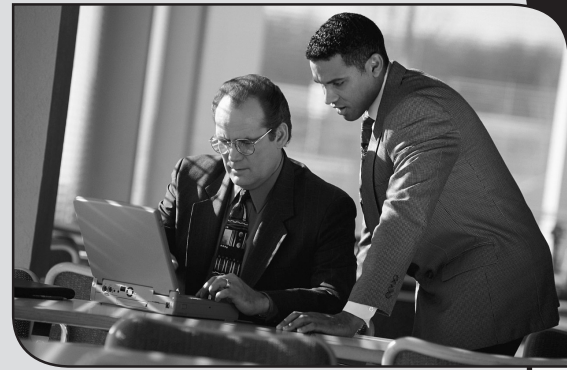
Covers consumer disputes submitted to one or more credit reporting agencies (CRAs) for inclusion in a consumer report, including direct dispute submission address, direct dispute notice content, investigation and reporting, frivolous or irrelevant disputes, and policy review and procedures.

Disposal of Consumer and Customer Information (#232) – \$150

Sets forth the bank's systems and policies regarding the destruction of customer and consumer information. Defines various bank records and outlines steps to destroy information contained in them. Includes information to review a third-party service.

Diversity and Inclusion (#325) – \$190

Assists a financial institution in defining how it will implement, monitor, and convey its standards in the hiring and promoting of employees and in dealing with suppliers. Includes a policy statement suitable for public sharing.



Bank Policies continued on page 18 ➡

POLICY DEVELOPMENT

Do Not Call (#240) – \$200

Provides banks with guidance on complying with FTC and FCC regulations dealing with telemarketing practices. Covers the National Do Not Call Registry, internal lists, customers and non-customers, training, and retention periods. Includes a template for a Do Not Call policy that you can give to individuals when they request a copy.

Dormant Account (#185) – \$200

Addresses responsibility, defining dormant/inactive accounts, processing, reporting, service charges, and interest payments.

Electronic Banking Risk Management (#182) – \$395

Establishes detailed policy guidelines for use of electronic banking, including security of customer information, third-party vendors, security controls, passwords, authentication, and strategic risk.

Electronic Data Processing (#094) – \$225

Outlines the basic standards required to meet all areas of the bank's data processing operations. Provides structure and guidance to management, establishes controls, and addresses outside vendors, program security, and documentation.

Emergency Preparedness and Disaster Recovery (#151) – \$295

Sets the basic plan for emergency preparedness, including employee training and protection, succession, alternative headquarters, back-up facilities, back-up systems, and testing.

Environmental Risk and Liability (#081) – \$295

Uses the principles established by CERCLA to set internal procedures for recognition of potential risks and liabilities, operations, and loan documentation.

Equal Employment/Affirmative Action Statement (#319) – \$100

Reaffirms the financial institution's policy to provide equal opportunity to all employees and applicants in accordance with all applicable Equal Employment Opportunity and Affirmative Action laws, directives and regulations.

E-Sign Act (#308) – \$175

The E-Sign Act provides a general rule of validity for electronic records and signatures for transactions in or affecting interstate or foreign commerce. E-Sign allows the use of electronic records to satisfy any statute, regulation, or rule of law requiring that such information be provided in writing, if the consumer has affirmatively consented to such use and has not withdrawn such consent.

Executive Officer (#087) – \$210

Defines the relationship between the board and executive management and between executive management and the bank's other personnel. Covers hiring practices, management succession, promotions, and salary administration.

Fair Credit Reporting Act (#115) – \$325

Defines the bank's responsibilities under the act, including loan and deposit declinations. Establishes guidelines for investigative reports and use of prescreened lists. Also covers alerts, adverse actions, use of prescreened lists, duties as furnishers of information, direct disputes, and use of medical information on credit decisions.

Fair Debt Collection Act (#117) – \$155

Establishes the bank's intent for proper debt collection practices, including collection guidelines, collection activities, and third-party communications.

Fair Housing Requirements (#121) – \$200

Designed to comply with all the regulatory agencies' reporting requirements. Establishes internal procedures for disclosure, applications, activity reports, and loan file information.

Fair Lending (#177) – \$360

Establishes fair lending activities, including taking loan applications, telephone inquiries, advertising, and credit evaluation standards. Also covers loan decisions, notifications, and adverse action. Includes discussion on prohibited actions, disparate treatment, and disparate impact.

Fixed Assets Management (#222) – \$200

Describes the responsibilities and processes utilized in the management of the bank's building, fixtures, furniture, and equipment.

Flood Insurance (#123) – \$250

Ensures the proper use of the flood hazard determination form, customer notification, insurance coverage, escrow, and forced placement procedures.

Funds Management (#097) – \$300

Designed to ensure that the bank is managed to provide adequate liquidity and a satisfactory and consistent level of profit within suitable interest rate risk constraints.

Holding Company (#225) – \$200

Sets forth the underlying philosophy and structure for all relationships and transactions between the bank and the holding company.



POLICY DEVELOPMENT

Home Equity Lending (#236) – \$205

Guides the bank in establishing requirements for marketing, underwriting standards, collateral valuation management, individual account and portfolio management, and servicing for open and closed-end loans.

Home Mortgage Disclosure Act Reporting (#119) – \$250

Establishes internal procedures that result in the proper recording of loan information, submission, and disclosures to the public.

Human Resources (#184) – \$395

Provides management with a clear understanding of what the bank expects from its employees and, in turn, what employees can expect from the bank. Covers equal employment opportunity, employee classifications, employee compensation, hiring practices, vacations, sick leave, family and medical leave, education, termination, and sexual harassment. Includes new employee orientation and training.

Identity Theft (#224) – \$260

Offers guidance to a bank's board of directors, management, and line personnel as to the nature of identity theft, ways to prevent or deter it, response to suspected or actual instances, and guidance for education of bank staff and customers.

Incident Response Plan (#250) – \$150

Lays out the steps to be followed should a bank experience a breach of data or loss of customer information. Includes an Incident Response policy, steps to take for specific types of incidents, a sample customer notification letter, and an incident response form.

Information Security Program (#252) – \$475

Designed to provide guidance to all bank employees of the confidentiality and importance of safely maintaining customer information.

Insider and Affiliate Credit (#075) – \$215

Designed to address the particular credit and legal standards that apply to insiders, including lending limitations for individuals and affiliates.

Insurance and Annuity Sales (#201) – \$395

Covers the bank's objectives regarding insurance and annuity sales, responsibilities, program management, setting circumstances of sales, qualifications and licensing, disclosures and advertising, salaries and compensation, third-party arrangements, compliance and audit, and the prohibitions of insurance sales.

Interest Rate Risk (#095) – \$300

Will guide the bank in recognizing, measuring, monitoring, and controlling interest rate risk in a timely and comprehensive manner and insure that risk limits are set in order to avoid undue interest rate risk from both a short-term and long-term perspective.

Interest Rate Risk Management Policy For Credit Unions (#292) – \$300

Major Topics Covered: Risk measurement methodologies, Interest rate risk scenarios - rate shocks, risk components, Risk parameters, Risk measurement system, System maintenance - inputs and assumptions, system capabilities, Assumption sensitivity analysis, Risk management strategies, Assignment of responsibilities, Reporting, Independent review and back-testing.

Internal and External Audit (#085) – \$275

Designed to assist board members with their audit responsibilities. Covers audit function structure and committee meetings, technical duties, compliance, filing audit reports, roles and responsibilities of the auditor, the audit program, program effectiveness, external audit firms, and review of external audit.

Internal Controls (#242) – \$275

Addresses the various controls to ensure efficient and effective bank operations, the reliability of financial reporting, and an effective risk management system. Covers administrative, accounting, and operating controls.

Internet and E-Mail Risk Management (#183) – \$295

Establishes a set of policies for use of the internet and e-mail facilities. Includes guidelines for customers' privacy, procedures in the case of disruptions of bank operations, bank computers, terminals, software, and their electronic connections.

Investment (#098) – \$295

Covers the delegation of investment authority and accountability, the definition of acceptable types of investments, and how to maximize the bank's profitability while meeting the local community's credit/financing needs.

I.T. Asset Lifecycle (#330) – \$150

Establishes lifecycles for the hardware and software that is used within the bank as defined by the manufacturer or determined by the bank, identified by the manufacturer's plans for providing technical support and developing patches to correct any identified security vulnerabilities or operability issues.

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.

POLICY DEVELOPMENT



Liquidity Management (#096) – \$235

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.

See page 4 for more liquidity products.

Litigation Risk (#211) – \$250

Defines the risks associated with real or threatened litigation. Covers legal counsel's role and responsibilities, risk management, assessment of potential losses, and system controls.

Loan Review (#082) – \$355

Covers loan review committee duties and loan review officer responsibilities and qualifications, as well as scope of review, sample selection, and types of review. Includes a special concern classification, loan watch list, and corrective action reporting and training.

Loan Workout (#286) – \$155

Establishes an appropriate practice for renewing and restructuring troubled credits. Addresses the requirements that are appropriate for the complexity of the bank's loans and that are consistent with safe and sound lending practices and regulatory reporting requirements.

Note: The information from this policy is included in the Collection, Workout, Charge-Off and Recovery Policy (see page 16), which can be purchased if your bank needs a more comprehensive policy.

Management of Country Risk (#212) – \$250

Addresses the risk that economic, social, and political conditions in a foreign country may adversely affect a bank's financial interests.

Marijuana/Cannabis and MRB Policy (#331) – \$275

Establishes the responsibilities and requirements for conducting banking activities for legal marijuana and cannabis businesses, including those Tier 2 and 3 businesses that have a secondary or tertiary relationship with marijuana related businesses.

Marketing (#090) – \$205

Provides guidelines for the bank's marketing function, including development of the annual marketing plan and ongoing decision making. Includes regulatory compliance, geographic limitations, and prohibited activities.

Merchant Services (#233) – \$250

Guides the bank in managing its relationship with Visa/MasterCard merchants. Topics include management of risk, capital adequacy, merchant approval processes, pricing, and fraud monitoring.

Military Lending Act (#323) – \$155

Outlines the objective of the Military Lending Act to extend protections to a broader range of closed-end and open-end products. Includes information on the MAPR, disclosure requirements, limitations and interpretations of the Department of Defense.

Model Risk Management (#295) – \$195

Establishes methodology to mitigate potential risks arising from the bank's reliance on financial models and to ensure that the sources and the magnitude of the bank's model risk are understood and managed effectively.

Money Services Businesses (#235) – \$200

Provides guidance to assess the risks associated with servicing MSBs. Topics include the identification, documentation, and monitoring of these entities, as well as the operational areas and reviews that must be conducted to be in compliance.

Overdraft Protection (#239) – \$195

Guides a bank through the best practices in setting up an overdraft protection program.

Overdrafts (#084) – \$195

Designed to address the risk associated with overdrafts, including the responsibility to communicate the policy to customers, payment or return of items, collection, charge-off and account closings, error resolution, and reporting.

Pandemic (#253) – \$195

May be used as a stand-alone policy or incorporated into your Business Continuity Policy. Contains guidance from the Interagency Statement on Pandemic Planning. Includes sample Pandemic Plan.

Planning and Budgeting (#088) – \$250

Identifies the responsible parties and outlines the process for developing and implementing the strategic plan and the budget.

Pre-Employment Background Screening (#237) – \$150

Reflects information contained in the FDIC's Financial Institution Letter 46-2005 on Pre-Employment Background Screening. Note: This policy is included in our Human Resources policy (#184).

Quality Control System (#226) – \$305

Sets the guidelines for establishing a quality control system. Covers the purpose and scope of a quality control system, system operation, investigation, and policy review.

Bank Policies continued on page 21 ➞

POLICY DEVELOPMENT

Real Estate Lending (#083) – \$360

Covers in detail the general policies that apply to all real estate secured lending, portfolio diversification, notices, pricing, CRE, product structure, IORR, construction lending, development loans, and concentration management.

Real Estate Settlement Procedures Act (#122) – \$275

Establishes internal procedures to ensure proper compliance with the act, such as disclosures, escrow accounts, mortgage servicing transfers, and error resolution.

Regulation B: Equal Credit Opportunity Act (#118) – \$200

Provides guidance for lenders on the requirements of this regulation as well as prescreening, the interview and application process, credit evaluation, action notifications, signature policy, and credit reporting.

Regulation CC: Expedited Funds Availability Act (#107) – \$295

Establishes internal procedures to address proper funds availability, disclosure, collection of checks, return of unpaid checks, and payment of interest on deposited funds.

Regulation D: Deposit Account Definitions and Reserve Requirements (#105) – \$155

Includes definitions for various types of deposit accounts, as well as eligibility, transaction limitations, and penalties. Provides the computation and reporting requirements of Regulation D and establishes internal procedures to assist personnel in complying with the reserve requirements.

Regulation DD: Deposit Account Terms (#106) – \$260

Addresses acceptable account terms, appropriate disclosure of these terms, and uniformity in advertising.

Regulation E: Electronic Funds Transfer Act (#108) – \$260

Establishes the internal procedures for proper issuance of access devices, disclosure, limitations on customer liability, documentation of transfers, and error resolution. Includes information on remittance transfer.

Regulation E: International Remittance Transfer (#293) – \$195

Provides guidance for banks that will act as Remittance Transfer Providers and process more than 100 remittance transfers annually. The systems required by this regulation are intended to significantly improve the predictability of remittance transfers, as well as provide consumers with better information for comparison shopping.

Regulation F: Correspondent Banking (#103) – \$300

Designed to limit the risks that the failure of another depository institution poses to the bank. Provides the board with a methodology for establishing criteria to select a correspondent bank and outlines procedures for identifying, monitoring, and managing correspondent relationships and correspondent concentration risks.

Regulation GG: Unlawful Internet Gambling (#263) – \$200

States how the bank will implement its compliance with Regulation GG and how it will identify and block, or otherwise prevent and prohibit restricted transactions.

Regulation P: Consumer Privacy (#200) – \$395

Addresses the collection, use, and retention of customer information, including maintenance of accurate information, limiting employee access, protection via security procedures, maintaining customer privacy in business relationships with third parties, and disclosure of privacy principles to customers.

Regulation Z: Loan Terms, Disclosures, and Advertising (#114) – \$375

Covers the requirements of the Truth in Lending Act. Includes exempt transactions, open-end credit, credit cards, home equity lines of credit, closed-end credit, right of rescission, as well as advertising for credit.

Remote Deposit Capture (#248) – \$255

Identifies and explains the inherent risks associated with RDC, establishes a sound risk management program, and outlines internal controls and written procedures for managing the on-going risk.

Right to Financial Privacy (#112) – \$155

Establishes limitations and duties regarding the release of information sought by government agencies.

Risk Management (#228) – \$195

Provides the overall framework for the supervision, management, operation, and control of the bank's risk management program. Includes duties and responsibilities of the risk management committee and risk management officer.

SAFE Act (#284) – \$250

Guides the bank in compliance with the SAFE Act in a manner appropriate to the nature, size, complexity, and scope of the bank's operations. Addresses registration requirements for mortgage loan originators and the bank, required information, use of unique identifiers, and maintaining registrations.

Safe Deposit Box (#162) – \$295

Ensures that the bank operates in a manner that complies with all applicable laws and provides absolute safety and privacy to customers with safe deposit boxes.

Safeguarding Customer Information (#202) – \$300

Pertains to the protection of customer information from unauthorized or illegal disclosure. Covers the development and implementation of an information security program, including responsibility, the assessment of risk, management and control of risk, employee education and training, testing, monitoring, oversight of service provider arrangements, updating/adjusting the program, and board reporting.

Bank Policies continued on page 22 ➔

POLICY DEVELOPMENT

***Sale of Nondeposit Investments* (#230) – \$195**

Applies to all retail sales of nondeposit products, including marketing and promotional activities. Covers objectives, scope, responsibility, minimum standards, program management, setting and circumstances of sales, disclosures and advertising, suitability, qualifications and training, compensation, fiduciary accounts, third-party arrangements, compliance and audit, exceptions to policy, and policy review.

***Secondary Mortgage Market* (#287) – \$155**

Establishes the guidelines for the bank to follow to stay in compliance with the rules, regulations, and industry standards that apply to the origination and sale of whole loans by the bank.

***Servicemembers Civil Relief Act* (#223) – \$255**

Outlines the financial relief protection extended to servicemembers when they are called into active military duty. Covers issues with direct implications to community banks, such as the bank's obligations in reducing interest rates, installment and lease contracts, coverage of certain family members, and automatic extensions of power of attorney.

***Social Media Policy and Guidelines* (#289) – \$310**

Provides guidance on how social media will be approached, proper methods for promoting the bank's message and image, and consequences of not following guidelines. Includes Management and User Guidelines for Social Media.

***Subprime Lending* (#204) – \$360**

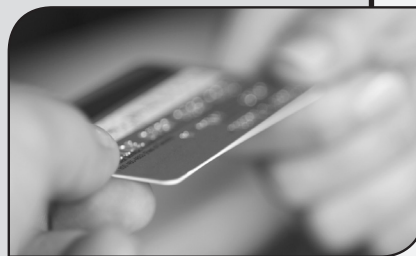
Addresses the regulatory agencies' concern about subprime lending. Covers definitions specific to subprime lending, risk management (including ALLL), capital adequacy, abusive practices, and training.

***Suspicious Activity Reporting* (#113) – \$200**

Provides the guidelines a bank must follow when reporting criminal activity, including insider misconduct.

***Technology Risk Management* (#176) – \$395**

Covers responsibility and management structure; security concerns related to physical systems, personnel, computers/databases, audit trails, and cyber threats; electronic banking; contingency planning; and potential exceptions.



***Unfair Deceptive or Abusive Acts & Practices* (#116) – \$335**

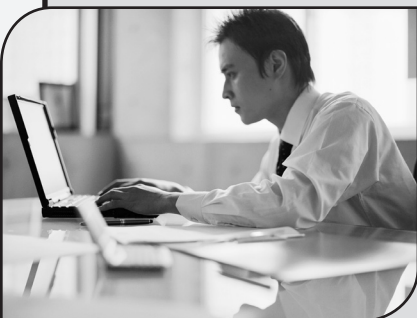
Establishes procedures for receiving and handling consumer complaints. States the bank's intent to prevent unfair, deceptive, or abusive acts or practices in connection with any transaction for a consumer financial product or service. Sets guidelines to properly handle consumer credit contracts, late charge accounting practices, and co-signer practices. Includes Review Procedures and Consumer Complaint Procedures.

***Vendor Risk Management* (#213) – \$350**

Provides guidance on managing the risks that may arise from outsourced relationships, including responsibilities, risk assessment, due diligence, contracts, security and confidentiality, controls, business resumption, and monitoring.

***Wire Transfer* (#159) – \$180**

Includes information on remittance transfers. Identifies the risks and establishes the policies dealing with wire transfers. Covers how to accurately process requests made in person, by phone, or other electronic means, with emphasis on regulatory requirements, money laundering, and settlement by giving best practice examples.



Consider our Policy Systems and Save Over 50%!

Our policy systems are designed to give your bank the policies you need at a substantial savings.

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Over 60 practical policies covering all areas of the bank including risk management, planning, investment, lending, and safety and soundness.

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Over 35 regulatory compliance-related policies covering deposit, operations, general lending, fair lending, and real estate lending.

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YA-0420-426



Consultants to the Financial Industry

Since 1978, Young & Associates, Inc. has provided consulting, outsourcing, and educational services to community financial institutions nationwide and overseas. We offer a wide array of products and services, covering all the major areas of banking. Through our affiliations with national and state associations, we provide educational seminars and on-line training that provide practical solutions and valuable insight into the issues you face with the ever-changing banking industry.

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