



Office of Thrift Supervision
Department of the Treasury

John F. Downey
Director of Supervision

1700 G Street, N.W., Washington, D.C. 20552

August 22, 1995

MEMORANDUM FOR: Chief Executive Officers

FROM: John F. Downey *John F. Downey*
Director of Supervision

SUBJECT: Revised Preliminary Examination Response Kit
(PERK)

Enclosed is the Office of Thrift Supervision's revised Preliminary Examination Response Kit (PERK) safety and soundness and compliance examination summary schedules. The PERK is a request by the OTS Regional Office for various documents that is prepared by the institution and made available to the examiners to facilitate the examination.

The regional office will tailor the PERK for each institution to obtain only the minimum information needed to conduct a risk-focused examination based on the examination scope. This approach will increase the efficiency of the on-site examination and reduce the burden on savings associations, particularly for highly rated, well-managed institutions engaging in traditional activities.

The following is a summary of the most significant changes that we made to the PERK:

- Eliminated the Attorney Letter and added to the safety and soundness summary schedule a request for identification of any overtly threatened or pending litigation.
- Eliminated redundancies throughout the PERK and grouped categories of information together for ease of reference.
- Eliminated duplicative information requests required to fulfill concurrent examination requirements. For example, one copy of the business plan will fulfill concurrent safety and soundness and compliance examination requirements.
- Eliminated requests for information that OTS already has access to, such as recently approved and pending applications.

- Clarified instructions to state that if existing management reports contain most, but not all, of the information requested, thrift management should consult with the OTS representative before creating a special report.
- Changed many requests from "a list of" to "access to."
- Updated regulatory references and deleted requests for unneeded items.
- Added to the summary schedules requests for information that are routinely requested during risk-focused examinations.
- Added dollar cutoffs to several items to provide a materiality standard.
- Specified that certain items are applicable only to stock institutions.
- Eliminated the Regulatory Limitations Worksheet and placed it in the Thrift Activities Handbook as a possible reference tool.
- Integrated customer service standards into the procedures.

Pursuant to the OTS customer service plan standards, the PERK will be sent to the institution four weeks prior to the examination start date and will include:

- the approximate start date for the on-site examination;
- the examination "as of" date;
- a contact person's name and phone number; and
- the number of on-site staff and an estimation of the amount of time required to conduct the examination.

We have attached a copy of the complete summary schedules for safety and soundness and compliance examinations so you can see the changes before your next examination. We will begin using this revised PERK for all safety and soundness and compliance examinations started after October 31, 1995. I hope that you find the revised PERK a streamlined and less burdensome package and that the changes facilitate the examination of your institution. If you have any questions or comments, please contact your OTS Regional Office.

Enclosures

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Examination As Of Date _____

_____ Docket #

_____ Institution Name

A summary of the information to be provided or made available in conjunction with the examination of your institution is listed below. Information marked with an "A" should be mailed to the undersigned at least 10 business days in advance of the date the examination starts. Information marked with an "X" should be provided to the examiner in charge at the start of the examination unless otherwise noted. Information marked with an "R" should be available for the examiners' on-site review. If you have any questions about these information requests, please contact the signatory or the examiner in charge.

All responses should be signed and dated by an officer of the institution (or related organization in the case of such information) as being complete and accurate. It would also be helpful if each response indicated who prepared the information and the date prepared. Finally, all information should be prepared as of the most recent quarter end unless otherwise indicated.

Name

Title

"CORE" PERK

The following enclosed documents should be completed and provided to the examiner in charge or the above signatory:

- ___ Management Questionnaire (PERK 002)
- ___ Schedule of Directors, Senior Executive Officers, and Attorneys (PERK 003)
- ___ Internal Controls Questionnaire (PERK 004)
- ___ Information Systems Questionnaire for Insured Institutions (PERK 005)

COMPLIANCE EXAMINATIONS

The following enclosed documents should be completed and provided to the compliance examiner in charge when a compliance examination is conducted concurrently with the safety and soundness examination:

- ___ Compliance Examination Summary Schedule (PERK 006)
- ___ Nondiscrimination Questionnaire (PERK 007)
- ___ Community Reinvestment Act Questionnaire (PERK 008)

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SUPPLEMENTAL SCHEDULES

The enclosed documents should be completed in conjunction with the safety and soundness examination, if applicable:

- ___ Schedule for Retail Sales of Nondeposit Investment Products (PERK 009)
- ___ Related Organization Questionnaire (PERK 010)
- ___ Information Systems Examination Information Request Schedule for In-House Institutions and Service Bureaus (PERK 011)
- ___ Trust Examination Summary Schedule (PERK 012)
- ___ Mortgage Banking Questionnaire (PERK 013)
- ___ Schedule of Stockholders (PERK 014)

SAFETY AND SOUNDNESS EXAMINATION REQUESTS

The following information may be provided in the format you currently use, including computer print-outs, work papers and reports. Several of the information requests include listings of data that examiners typically find useful. If management reports do not include each and every data item requested, please discuss the matter with the field manager or examiner in charge before retrieving the information from other reports or sources. If the requested information is already in board or committee minutes, please identify the names and phone numbers of the individuals responsible for providing documents.

Capital Adequacy

- ___ A copy of the worksheet used to complete schedule CCR of the Thrift Financial Report (TFR).
- ___ Copy of any plan adopted between examinations by the board of directors to enhance capital.

Asset Quality

- ___ Summary of new lending¹ for each category of assets since the last examination date of _____. Information needed, by type of loan, includes total number of new loans and the aggregate loan amount.
- ___ Access to a loan register or similar records (such as loan activity reports prepared for board meetings or worksheets used to complete the loan activity section Schedule CF in the TFR) which will disclose details on all loan activity conducted since the previous examination.

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- _____ A list of nonhomogeneous loans, including origination dates, in excess of \$ _____ that would include any nonresidential real estate loans, multifamily real estate loans, construction loans, commercial loans, and land loans. As an alternative, the institution may provide loan codes or other information that will readily identify all new non-homogeneous loans.
- _____ Loan trial balance (in alphabetical order by borrower's names, if available) for each category of loans originated or purchased by the institution.
- _____ A list of all loans reviewed through the internal asset review function, excluding single-family permanent mortgages and consumer loans, since the last examination date of _____. Information needed includes:
- a. loan number
 - b. loan type
 - c. borrower
 - d. loan balance at time of review
 - e. date of review
 - f. classification
- _____ A list of problem assets and assets classified internally and any subsequent updates. Suggested information includes:²
- a. loan number
 - b. loan type
 - c. borrower
 - d. project/type of property/collateral
 - e. classification
 - f. brief explanation of reason for classification
 - g. original loan amount
 - h. current balance
 - i. loans in process
 - j. accrued interest
 - k. specific valuation allowance
 - l. type of valuation, valuation amount, and date
 - m. impairment amount, if applicable, and date measured
- _____ A list of real estate owned, real estate in judgment, and other repossessed assets. Suggested information includes:²
- a. REO number
 - b. previous borrower
 - c. most recent appraised value and date
 - d. current fair value and date
 - e. date became REO/REJ
 - f. fair value at time of foreclosure or in substance foreclosure
 - g. current balance
 - h. property type
 - i. list price
- _____ A breakdown of all valuation allowances, showing both allowances for loan and lease losses (ALLL), general allowances on non-loan and lease assets, and specific allowances. Identify the assets for which the specific allowances were established. Provide supporting documentation to

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show how the level of ALLL and specific allowances were established, including historic loss experience and other risk factors.

— A report of all loans, except consumer loans and one-to-four family mortgage loans, that are 30 days or more past due/delinquent including those serviced by others. Suggested information includes:

- | | |
|----------------------------|--------------------------------------|
| a. name of obligor | e. number of delinquent payments |
| b. original loan amount | f. date up to which interest is paid |
| c. outstanding loan amount | g. collateral other than RE |
| d. date of loan | |

— A report of all consumer loans and one-to-four family mortgage loans 60 days or more past due/delinquent including those serviced by others. Suggested information includes:

- | | |
|----------------------------|--------------------------------------|
| a. name of obligor | e. number of delinquent payments |
| b. original loan amount | f. date up to which interest is paid |
| c. outstanding loan amount | g. collateral other than RE |
| d. date of loan | |

— A list of loans on which interest is not being accrued (non-accrual loans). Include loans for which the institution is reserving accrued interest. Suggested information includes:

- | | |
|-------------------------------|--|
| a. loan number | e. current principal balance |
| b. borrower's name | f. access to a computer run
list of the reserves for uncollectable
interest by loan number |
| c. date placed on non-accrual | |
| d. original amount | |

— A list of REO sold and loans to facilitate the sale of REO.

— A list of troubled debt restructurings and negative amortizing loans. Also, a list of loans modified since the last examination date of _____. Suggested information includes:

- | | |
|--|-----------------------------|
| a. loan number | g. previous REO number/name |
| b. date of loan | h. interest paid-to-date |
| c. original loan amount | i. borrower/purchaser |
| d. current principal balance | j. sales price (of REO) |
| e. most recent appraised value
and date | k. current interest rate |
| f. most recent FV or other valuation
and date | l. repayment terms |
| | m. date paid through |
| | n. gain/loss on sale |

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_____ A list of major/multiple borrowers, as defined by institution management, segregated by loans (including loans made by subsidiaries to the same borrowers) and investments in commercial paper and corporate debt securities. Provide supporting documentation to show how major borrowers were defined, for example, a certain percentage of assets or capital pursuant to 12 CFR § 563.93. Suggested information includes:

- | | |
|----------------------------------|-------------------|
| a. loan number | d. date of loan |
| b. borrower | e. name of issuer |
| c. outstanding principal balance | f. issues |

_____ Access to a list of approved appraisers, their qualifications (unless previously provided), and date of annual performance review.

_____ A list of non-SFD loan participations purchased/sold since the last examination date of _____.³ Suggested information includes:

- | | |
|-----------------------------------|--|
| a. loan number | h. premiums/discounts received/granted |
| b. dollar amount purchased | i. date paid through |
| c. date of loan | j. date purchased/sold |
| d. current participation balance | k. total loan to value |
| e. borrower | l. recourse agreements or attorney opinion on non-recourse |
| f. seller/purchaser | m. appraised value |
| g. interest rate on participation | |

_____ Access to a list of all outstanding lines of credit in excess of \$_____, other than equity lines of credit. Suggested information includes:

- | | |
|---------------------------|--------------------|
| a. date line approved | e. interest rate |
| b. dollar amount approved | f. maturity date |
| c. current balance | g. collateral |
| d. borrower | h. repayment terms |

_____ Access to a list of all outstanding letters of credit. Suggested information needed includes:

- | | |
|-----------------------------|-------------------|
| a. date of issuance | e. amount |
| b. to whom issued | f. serial number |
| c. issued on behalf of whom | g. undrawn amount |
| d. expiration date | h. purpose of LOC |

_____ Access to a list of outstanding loan commitments in excess of \$_____ to originate high-risk loans, including construction loans, nonresidential loans, multifamily loans, commercial loans,

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and land loans. Include commitments on contingent liabilities to purchase or sell securities. Suggested information includes:

- | | |
|--|--|
| a. name of borrower | f. type of loan |
| b. commitment date | g. expiration of commitment |
| c. commitment amount | h. other commitment terms,
i.e., optional or firm |
| d. to whom committed | i. commitment rate |
| e. currently funded portion
of commitment | |

_____ A list of loans repurchased since the last examination date of _____.³ Suggested information includes:

- | | |
|---------------------|--------------------------|
| a. loan number | d. current balance |
| b. borrower(s) name | e. payment status |
| c. type of loan | f. reason for repurchase |

_____ Access to a list of pools of whole loans purchased/sold since the last examination date of _____.³ Suggested information includes:

- | | |
|---------------------------|------------------------------|
| a. number of loans | e. purchase/sales price |
| b. total dollar amount | f. premium or discount |
| c. purchased from/sold to | g. gain/loss on sale |
| d. servicer | h. excess servicing recorded |

_____ Access to a summary of loans in process account balances in excess of \$_____.

_____ Access to a list of loans granted with limited documentation pursuant to 12 CFR § 563.170(c) (10). Suggested information includes:

- | | |
|-----------------|------------------------------|
| a. loan number | d. original loan amount |
| b. date of loan | e. current principal balance |
| c. borrower | |

_____ A list of loans that are of special concern (i.e., slow sales, low occupancy, construction problems, legal problems, financially weak borrower, etc.) and have not been designated as classified or special mention. Suggested information includes:

- | | |
|----------------------------------|-----------------------------|
| a. loan number | e. current balance |
| b. borrower | f. loans in process balance |
| c. property type | g. nature of problem |
| d. original loan date and amount | |

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_____ List of inventories of completed but unsold units with respect to property that secures speculative construction, condominium conversion, and land development loans, and projects owned by the institution or related organization(s). Suggested information includes:

- | | |
|--|--|
| a. loan number | e. last disbursement date and amount |
| b. borrower | f. LIP balance |
| c. location (subdivision, if applicable) | g. construction completion date |
| d. loan date and amount | h. status (sale pending, contract, etc.) |

Management/Administration

_____ Organizational chart¹ that includes executive officers and pertinent department heads. Provide only if changes have been made since the last examination.

_____ Corporate structure chart¹ including holding company, other affiliates and related organizations. Provide only if changes have been made since the last examination and identify changes in writing to the EIC.

_____ Home addresses of the board of directors and senior executive officers. Provide only if changes have been made since the last examination.

_____ Principal board and management operating committees including name, function, members, and frequency of meetings. Provide only if changes have been made since the last examination and identify changes in writing to the EIC.

_____ Access to all minutes of the board of director and principal committee meetings.¹

_____ The "board package," i.e., reports prepared for the board of directors on a regular basis and presented at the last board meeting. Also, for the duration of the examination, please include the examiner in charge in your distribution of such reports.

_____ Access to all significant written policies¹ including those governing:

- | | |
|---|--|
| a. Lending (all types), Appraisal, Environmental Risk, and Collection | f. Asset/Liability Management |
| b. Loan Servicing | g. Interest Rate Risk |
| c. Investment | h. Liquidity/Funding |
| d. Internal Asset Review | i. Hedging |
| e. Asset Classification/Valuation Allowance | j. Mortgage Banking, including pipeline hedging if not covered elsewhere |
| | k. Sale of Nondeposit Investment Products |

Those with significant additions or changes since the last examination date of _____ should be identified in writing to the EIC.

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- _____ Identify any overtly threatened or pending litigation against the association or any of its subsidiaries where the amount claimed is more than \$ _____. For each such matter, provide the following information:
- a. The nature of the claim and the stage of the proceeding (including a probable trial date);
 - b. The amount in question;
 - c. How management is responding or intends to respond to the claim (e.g., contest the claim vigorously or seek an out-of-court settlement);
 - d. An estimate of the amount of the potential loss or the range of such loss.
- _____ A list of any new or modified employment contracts including information on employee contracts that expired or were revoked since the last examination date of _____. Other employment contracts should be available for review.¹ Information needed includes:
- a. director, officer or employee
 - b. position
 - c. date of agreement
 - d. term
 - e. date and synopsis of any modifications
 - f. summary of pertinent provisions
- _____ Access to resumes of senior executive officers that have not been previously provided; other resumes should be available for review.
- _____ Copies of the most recent independent audit report, management letter and any other reports from the independent auditor that make reference to the audit for the parent holding company, institution, and any related organizations that have not been otherwise filed, with the OTS or the FDIC as required by 12 CFR § 562.4 and Part 363.
- _____ Access to journal vouchers making independent audit adjustments.
- _____ A copy of the internal audit program¹ (or any changes) and a list of (and access to) internal audit¹, compliance, asset review department, and any other material oversight department reports for the institution and its related organizations completed since the last examination date of _____.
- _____ Access to reports and records and supporting documentation pertaining to all transactions and arrangements with affiliates (in a manner consistent with the requirements in 12 CFR §§ 563.41 and 563.42) and extensions of credit to insiders of the institution, its subsidiaries or affiliates (as required in §§ 563.43 and 12 CFR Part 215).
- _____ Access to the Director's and Officer's (D & O) liability policies and applicable fidelity and surety bonds.

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- _____ Access to a list of outstanding contracts with investment advisors, deposit brokers, and other consultants including securities brokers used by the institution.

Earnings

- _____ Access to or a copy of the general ledger for the institution and applicable subsidiaries, including a legend of Thrift Financial Report (TFR) line numbers and corresponding general ledger account numbers. Access to any worksheet that documents the preparation of the TFR from the general ledger.

- _____ Copy of the business plan (include mission statement) and budget projections, along with your assumptions.¹

- _____ Access to 10K, 10Q, and 8K reports and other securities filings, if applicable.

- _____ A list of brokered deposits. Information needed includes:

- | | |
|------------------|--------------------|
| a. interest rate | c. maturity date |
| b. dollar amount | d. date of deposit |

- _____ A schedule of Federal Home Loan Bank advances and other borrowed money. Information needed includes:

- | | |
|--------------------|--|
| a. borrowed from | e. maturity date |
| b. amount borrowed | f. interest rate; reset frequency and index on adjustable products |
| c. date borrowed | g. collateral |
| d. current balance | |

- _____ A schedule of gains and losses on sales of REO, securities, and other assets.

- _____ A list of all unposted audit adjustments.

Liquidity — Asset/Liability Management

- _____ The institution's Interest-Rate-Risk Management reports (TB 13), along with the assumptions underlying the institution's TB 13 analysis (e.g., prepayment rates, discount rates, deposit decay rates, etc.).

- _____ A list segregated by major asset categories or pools of securities/investments, and off-balance sheet contracts, including equity investments, mortgage-backed securities, repurchase agreements, reverse repurchase agreements, short sales, and commitments for future investment

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transactions. List open positions in the futures and options market, including swaps, caps, floors, and commitments to buy and sell loans and other securities. Information needed includes:

- | | |
|--|--|
| a. type of investment or description of security | k. current balance |
| b. date acquired | l. eligible for short- or long-term liquidity |
| c. maturity date and call provisions, if any | m. held to maturity, available for sale, or trading |
| d. purchase price | n. par value |
| e. interest rate/yield | o. unrealized gain or loss |
| f. broker from whom purchased | p. impact of LOCOM/mark-to-market adjustments |
| g. CUSIP number | q. impact of prepayments |
| h. original premium or discount | r. the WAC, WAM, WARM, and weighted average reset frequency on adjustable products |
| i. fair value | |
| j. unamortized premium or unaccreted discount | |

___ A list of all securities bought and sold with gains and losses since the last examination date of _____.

___ Provide analyses detailing the rationale for any activities undertaken during the examination period that altered the institution's interest-rate risk profile (hedge positions, investments, balance sheet restructurings, etc.).

___ For originated, purchased and excess servicing assets, provide the following:³

- a. Aggregate calculation of excess servicing fee receivable (ESFR), including information supporting prepayment and discount rates used;
- b. Three most recent ESFR calculations, including the calculations of the gain or loss on those loan sales;
- c. Most recent market valuation for the capital calculation.

Footnotes

¹This item may also be required to fulfill compliance examination requirements. If a safety and soundness examination is conducted concurrently, institution management need only provide one response.

² Institution management need not provide duplicative information if requests overlap.

³This item may be deleted if the Mortgage Banking Questionnaire is included in the PERK.

Compliance Examination Summary Schedule

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Review Period _____ through _____

Institution Name

The following is a schedule of information to be made available to the examiner in charge either prior to or at the commencement of the compliance examination. The information will help ensure an efficient review of the institution and minimize additional requests; however, other information may be requested during the examination. Please provide a brief explanation for any information that is not provided, e.g., included with the safety and soundness examination requests, or indicate the name of an individual to contact to obtain the requested information.

I. GENERAL

- __1. Organization chart, including the compliance officer and internal audit department reporting lines.¹
- __2. Corporate structure chart, including related organizations and affiliates.¹
- __3. Formal compliance policy and program adopted by the board of directors.
- __4. Identify the compliance officer and describe duties, or identify the distribution of compliance responsibilities. Also, identify the members of any compliance, community reinvestment or audit committees.
- __5. Internal/External audit reports¹ and other reviews that address compliance matters, including any self-assessments performed.
- __6. Minutes of board of directors' and other meetings¹ (including internal audit committee meetings) addressing CRA, Bank Secrecy Act, and other compliance matters, that were held during the review period. Please include materials reviewed or referred to in the minutes.
- __7. Real estate appraisal policy adopted by the board of directors, and appraisal manuals utilized by internal appraisers.¹
- __8. Debt collection procedures and loan modification policies adopted by the board of directors.¹
- __9. Foreclosed real estate disposition procedures and manuals.¹
- __10. Loan servicing and collection procedures and manuals.¹
- __11. Branch/Teller manuals.
- __12. Policies and procedures relating to deposit administration, including compliance with the Truth in Savings Act.
- __13. Training manuals and other training information relating to compliance laws and regulations. Include a record of dates and participants, if available.

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- __14. List all accountholders/borrowers living outside of the United States.
 - __15. List all loan programs, including both open- and closed-end mortgage and consumer loan programs, and current rate sheets.
 - __16. List third party or affiliated vendors providing compliance services.
 - __17. Current underwriting standards and policy, as approved by the board of directors, and publicly-available loan underwriting standards. Include information on any credit-scoring system utilized and results of any validations conducted.¹
 - __18. Internal loan processing procedures relating to issuance of various loan disclosures.
 - __19. Mission statement and business plan, including financial projections.¹
 - __20. Sample Loan Officer/Originator employment agreement, including commission schedule if applicable.¹
 - __21. Internal audit procedures.¹
 - __22. Summary of new lending,¹ by month, of the number and total dollar amount of loans granted and purchased during the review period. Please separate the loans into the various types (e.g., purchase of one- to four-family, construction 5+ units, consumer installment, etc.) normally distinguished by your institution. Also, please distinguish refinance loans from purchase loans.
 - __23. Describe all litigation, pending litigation, or claims, judgments, and assessments in which the institution is involved or in which it is likely to become involved.

II. BANK PROTECTION ACT

- __1. Identify the security officer and provide evidence of appointment by the board of directors.
- __2. Security policy and program and evidence of adoption by the board of directors. Include any training records.
- __3. Criminal Referrals (OTS Form 366) filed in accordance with § 12 CFR 563.180(d).¹
- __4. Reports of robberies or unexplained losses for which no criminal referrals were filed.

III. BANK SECRECY ACT (BSA)

- __1. Identify BSA Officer and other individual(s) involved in substantial BSA activities such as daily monitoring (not including tellers).

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- __2. BSA policy adopted by the board of directors.
 - __3. BSA compliance program.
 - __4. Currency Transaction Report (CTR) Forms 4789 and Forms 4790 that have been filed.

IV. COMMUNITY REINVESTMENT ACT (CRA)

- __1. Completed CRA Questionnaire (enclosed).
- __2. CRA Program developed by the board of directors.
- __3. CRA Statements in effect for the last two years for each of the institution's local communities, and date approved by the board of directors.
- __4. CRA Public File.
- __5. Copy of the most recent Community Support Statement filed with the Federal Housing Finance Board (FHFB) and FHFB response. Also, include any action plans filed with the Federal Home Loan Bank.
- __6. Branch closing policy adopted by the board of directors.
- __7. Census tract map(s), if available, covering delineated community.

V. ELECTRONIC FUND TRANSFER ACT (EFTA)

- __1. EFTA policy adopted by the board of directors.
- __2. Initial disclosure statement of terms and conditions.
- __3. Sample error resolution notice provided periodically to customers.
- __4. Records describing any complaints received.
- __5. Sample periodic statements showing electronic fund transactions.
- __6. Sample automated teller machine receipt.

VI. EQUAL EMPLOYMENT OPPORTUNITY (EEO)

- __1. EEO policy adopted by the board of directors.

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- __2. Any other EEO policies, including affirmative action, developed by the institution.
 - __3. Employment administration manuals and the employee handbook.
 - __4. Results of any review of employment practices or facilities access under the American Disabilities Act.

VII. EXPEDITED FUNDS AVAILABILITY ACT (EFA)

- __1. EFA policy adopted by the board of directors, and procedures used to ensure compliance.
- __2. EFA Disclosure Statement and sample (blank) deposit hold notices (exception, reasonable cause, or case-by-case).

VIII. FLOOD DISASTER PROTECTION ACT (FDPA)

- __1. FDPA policies adopted by the board of directors, and procedures to ensure compliance.
- __2. Disclosure used to notify applicant of flood zone determinations.

IX. HOME MORTGAGE DISCLOSURE ACT (HMDA)

- __1. A list of offices where the institution's HMDA reports are available to the public.
- __2. Loan application register (LAR) and LAR modified for public use.

X. NONDISCRIMINATION

- __1. Completed Nondiscrimination Questionnaire (enclosed).
- __2. Cosigner disclosure forms.
- __3. Any nondiscrimination policy and training records.

XI. FORMS AND DISCLOSURES

- __1. All credit application forms, including applicant financial statement, for all types of credit offered by the institution.
- __2. Application denial, counteroffer, approval, and credit account adverse action forms.
- __3. Internal application transmittal, credit evaluation, and credit scoring forms.

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- __4. Note and security agreement forms for all loans and lines of credit. If applicable, include any consumer lease financing documents and disclosures.
 - __5. Segregated disclosures for closed-end credit.
 - __6. Itemization of amount financed forms.
 - __7. Initial and periodic disclosure statements for open-end credit.
 - __8. Any additional disclosure materials provided for credit cards, home equity lines of credit, or reverse mortgages.
 - __9. Program disclosures for each type of ARM mortgage loan offered and the ARM informational booklet.
 - __10. ARM adjustment notice forms.
 - __11. Servicing transfer policy and three-year history disclosure statement form.
 - __12. Servicing transfer to/from notification forms.
 - __13. Initial and annual disclosure forms used for escrow accounts.
 - __14. Uniform Settlement Statement (Form HUD-1), Good Faith Estimate form, required provider disclosures, and settlement costs informational booklet.
 - __15. Truth in Savings disclosures, including initial and periodic disclosures, maturity notices, and sample rate sheets for all types of consumer deposit accounts available or held during the review period.
 - __16. Savings (passbook, certificate, NOW, MMDA) and demand deposit account agreement forms, for accounts now being offered/accepted.

¹ This item may also be required to fulfill safety and soundness examination requirements. If a compliance examination is conducted concurrently, institution management need only provide one response.