

May 2010 - INTERSTATE CAPITOL COMMENTS

Community Bankers Association of Kansas

3003 SW Van Buren, Suite A *Topeka, KS 66611-2224 *Phone: 785-271-1404 *Fax: 785-271-1508

info@cbak.com * www.cbak.com



CBA 32nd Annual Convention

July 8 – 10th, 2010
Hyatt Regency
Wichita, KS



The 32nd annual
Kansas
Community
Bankers
Association
Convention will
be held at the
Hyatt Regency
in Wichita on

July 8th 9th and 10th, 2010. As
chairman, I invite you to attend and to
bring your family members and
employees to Wichita for the
informative meetings and the fun
filled time.

We as Community Bankers are living
in a very interesting time with the
markets and regulation changes. We
owe much gratitude to the ICBA for
keeping our banks informed on the

(To access a blue underlined hyperlink, place your cursor on the link, use Ctrl + Click and the page will open.)

Compliance with Reg GG required by June 1, 2010

As you may recall, on November 12, 2008, the Department of the Treasury and the Federal Reserve Board announced the release of a joint final rule to implement the Unlawful Internet Gambling Enforcement Act of 2006. The Act prohibits gambling businesses from knowingly accepting payments in connection with unlawful Internet gambling, including payments made through credit cards, electronic funds transfers, and checks. Initially, the new regulation was scheduled to take effect on December 1, 2009, but required compliance was delayed to June 1, 2010.

Comment: The final rule requires financial firms that participate in designated payment systems to establish and implement policies and procedures that are reasonably designed to prevent payments to gambling businesses in connection with unlawful Internet gambling. The rule provides non-exclusive examples of such policies and procedures and sets out the regulatory enforcement framework. For purposes of the rule, unlawful Internet gambling generally would cover the making of a bet or wager that involves use of the Internet and that is unlawful under any applicable federal or state law in the jurisdiction where the bet or wager is initiated, received, or otherwise made.

New Version of FDIC's EDIE

The FDIC's [Electronic Deposit Insurance Estimator \(EDIE\)](#)ⁱ is an interactive tool created to help consumers determine if their deposit accounts at FDIC-insured institutions are fully insured and assist bank employees who answer customer questions about deposit insurance coverage. A new brandable EDIE allows FDIC-insured institutions to customize and integrate EDIE into their Web sites. New enhancements to EDIE allow users to calculate coverage for irrevocable trust and government accounts, in addition to personal accounts and business accounts. EDIE now offer users the ability to calculate coverage for deposit accounts that mature in or after 2014 and features an updated Deposit Insurance FAQ, Glossary of Terms, and information on how to contact the FDIC.

Helpful FDIC documents:

[Overview of brandable EDIE](#)ⁱⁱ

[Technical aspects of integrating brandable EDIE into an insured institution's Web site](#)ⁱⁱⁱ

Comment: Integrating EDIE into your bank's Web site will allow your customers to use EDIE without ever leaving your Web site.

Large fine assessed and restitution ordered for overdraft fees

Woodforest Bank, Refugio, Texas, agreed to pay a penalty of \$400,000 and refund over \$12 million to consumers for excessive overdraft fees. The \$85.9 million bank agreed to two enforcement orders, a cease and desist order, and an order assessing a civil money

regulations and working for our Community Bankers on the national level. They remind the leaders of our country that we are the backbone of banking for our nation. Thank you to our Kansas ICBA Directors for a great job.

The CBA convention committee and staff have developed an exceptional program. The speakers and workshops will be informative as well as entertaining. The trade show will provide a collection of products and services that will assist us for our future needs as community bankers. The programs planned for the children and spouses will be outstanding along with the evening entertainment. Remember the Chairman's reception and banquet on Saturday evening prior to the annual PAC live auction. This is a great chance to renew old friendships and make new acquaintances in the CBA.

It has been an honor to serve as your CBA Chairman and to have the opportunity to work with our extraordinary staff, board and committee members.

Peggy and I invite you to the CBA Convention in Wichita, July 8-10, at the Hyatt.

Gary Kay
Nekoma State Bank – La Crosse, KS
CBA Chairman

Keynote Speaker Dr. Gene Stanaland



Dr. Gene Stanaland has been called the "Will Rogers of Economics." He has the uncanny

ability to take complex subjects and make them understandable and entertaining. Through his wit and style he makes the "dreary science" exciting, leaving audiences laughing and informed.

penalty.

Comment: The OTS press release mentions that the OTS's proposed [Supplemental Guidance on Overdraft Protection Programs](#)^{iv} emphasizes that thrift institutions must clearly represent the features of such programs, provide consumers with the opportunity to choose whether to participate, explain the thrift's policies on clearing transactions and place reasonable aggregate limits on overdraft fees. The proposed guidance would supplement guidance issued in 2005. Comments are due by June 28, 2010. See the [OTS CEO Letter](#)^v on proposed supplemental overdraft guidance

When Treasury says it's going green, it doesn't always mean money

On April 19, the Treasury began implementing a [three-pronged initiative](#)^{vi} to dramatically reduce the number of transactions that are conducted on paper by moving them to electronic systems:

- Treasury will require individuals receiving Social Security, Supplemental Security Income, Veterans, Railroad Retirement and Office of Personnel Management benefits to receive payments electronically.
- Businesses currently permitted to use paper Federal Tax Deposit coupons will have to make those deposits electronically beginning in 2011 with a few exceptions, primarily businesses with \$2,500 or less in quarterly tax liabilities that pay when filing their returns.
- Treasury will eliminate the option to purchase paper savings bonds through payroll deductions for federal employees on September 30, 2010 and for the private sector by January 1, 2011.

FinCEN advisory on SARs on home equity conversion mortgage fraud

FinCEN, in consultation with HUD's Office of Inspector General, issued an [advisory](#)^{vii} to highlight reverse mortgage fraud schemes potentially related to the FHA Home Equity Conversion Mortgage (HECM) program so that financial institutions may better assist law enforcement when filing SARs. The advisory contains examples of common fraud schemes and potential "red flags" for fraudulent activity related to HECMs. To assist law enforcement in its efforts to target this type of fraudulent activity, this advisory also suggests key words for financial institutions to use when completing SARs involving fraud related to the HECM program.

Comment: The advisory requests that the term "HECM" be used in the narrative portion of a SAR when a fraud involves a FHA Home Equity Conversion Mortgage. The advisory requests that you also use the term "FHA". It requests the exact dollar amount associated with the HECM loan proceeds. Additionally, include individual or company name, address, phone number, and any other identifying information in the Suspect/Subject Information Section of the SAR. When a senior homeowner is a victim of a scam, include sufficient information in the narrative about the senior and the property to assist law enforcement in investigating and prosecuting.

Fed clarifies SAR filing requirements

SR letter 10-8, "[Suspicious Activity Report Filing Requirements for Banking Organizations Supervised by the Federal Reserve](#)"^{viii} replaces SR letter 02-24, "Suspicious Activity Report Filing Requirements for Nonbank Subsidiaries of Bank Holding Companies and State Member Banks," and provides clarification on compliance with suspicious activity reporting requirements of the Board.

Final Guidance on Correspondence Concentration Risk

The OCC, Fed, OTS, and FDIC issued the [Final Interagency Guidance on Correspondent Concentration Risks](#)^{ix} (guidance). This guidance outlines the agencies' expectations for financial institutions to identify, monitor, and manage credit and funding concentrations to other institutions on a standalone and organization-wide basis, and to take into account exposures to the correspondents' affiliates. Institutions also should be aware of their affiliates' exposures to correspondents as well as the correspondents' subsidiaries and affiliates. In addition, the guidance addresses the agencies' expectations for financial institutions to perform appropriate due diligence on all credit exposures to and funding transactions with other financial institutions.

Despite what may appear to be an “unserious” attitude about economics, Dr. Stanaland has served in a variety of distinguished corporate, academic and government positions. For twenty years, he was the member of the Economics Department at Auburn University in Alabama, and he was the head of the department for the last eight of those years. After serving as the Chairman of the Board, for Computer Maintenance Professionals, he resigned to become the head of GSE, Inc. a nationally recognized economics and management consulting firm. In addition, he has far reaching business interests and serves on the board of directors of prominent banks and corporations.

HOTEL RESERVATIONS

Hotel accommodations at The Hyatt Regency are not included in your convention registration and should be made directly with the Hotel.

CBA has reserved a block of rooms for Wednesday, Thursday, Friday and Saturday nights, July 7-10, 2010. This block of rooms consists of hotel guest rooms. The special block price of \$109/night will be held until Monday, June 16, 2010. After June 16, neither price nor room availability will be guaranteed, so make your reservations today!

Be sure to mention you are with the Community Bankers Association.

Hyatt Regency
Wichita, KS
(800) 233-1234

Room Block Price: \$109
(double/single/king)

Check in Time is 4:00 p.m.

Price and availability cannot be guaranteed after June 16, 2010.

This guidance does not supplant or amend applicable regulations such as the [Federal Reserve Board’s Limitations on Interbank Liabilities \(Regulation F\)](#).^x It clarifies that financial institutions may need to take actions beyond the minimum requirements established in Regulation F to identify, monitor, and manage correspondent concentration risks, especially when rapid changes exist in market conditions or in a correspondent’s financial condition, in order to maintain risk management practices consistent with safe and sound operations.

OTS: Prohibited Consumer Credit Practices

OTS amended its regulations at 12 CFR part 535 titled “[Prohibited Consumer Credit Practices](#)”^{xi} to avoid duplication and inconsistency with the Credit Card Accountability Responsibility and Disclosure Act of 2009 and the rules of the Board of Governors of the Federal Reserve implementing that statute. This rule is effective on July 1, 2010.

Fed announces price increases for paper-based transactions

Effective July 1, 2010, the Federal Reserve Banks will implement enhancements to some of its Check 21-enabled Services and price increases for paper-based check services in an effort to encourage the final shift toward electronic check processing. [Enhancements and increased prices](#).^{xii}

Fraudulent email purportedly from FDIC

The FDIC has received numerous reports of a fraudulent e-mail that has the appearance of being sent from the FDIC. The subject line of the e-mails state: "Just for your time." The e-mail tells recipients that, "The Federal Deposit Insurance Corporation Online department kindly asks you to take part in our quick and easy 5 questions survey." It attempts to entice recipients to take the "survey" by telling them "In return we will credit \$50.00 to your account - Just for your time!" The e-mail then directs recipients to click on a link to take the survey (a fraudulent link is provided). This e-mail and associated Web site are fraudulent.

Comment: The FDIC does not issue unsolicited e-mails to consumers. Financial institutions and consumers should NOT follow the link in the fraudulent e-mail. As a customer service, you might relay this warning to your customers.

New \$100 note to premier Feb. 2011

On February 10, 2011, the U.S. Treasury will issue a newly designed \$100 note. Advanced technology of the new design includes the 3-D Security Ribbon and the Bell in the Inkwell. These security features are easy for consumers and merchants to use to authenticate their currency. The blue 3-D Security Ribbon on the front of the new \$100 note contains images of bells and 100s that move and change from one to the other as you tilt the note. The Bell in the Inkwell on the front of the note is another new security feature. The bell changes color from copper to green when the note is tilted, an effect that makes it seem to appear and disappear within the copper inkwell. For a more detailed description of the redesigned \$100 note and its features, visit www.newmoney.gov where you can watch an animated video, click through an interactive note or browse through the multimedia resources for images.

Comment: The \$100 note is the highest denomination issued and the denomination most often counterfeited. Visit www.newmoney.gov for information on how to order free training materials for cash handlers, or you may download the materials directly from the Web site. The training materials for the \$100 note are available in 25 languages.

OTS revises exam handbook section on fraud and Insider abuse

OTS issued revised [Examination Handbook Section 360, Fraud and Insider Abuse](#).^{xiii} The entire section was restructured the entire so it does not include change bars in the margins. The revised exam handbook section:

- Added a discussion on SAR reporting requirements and the applicability of the “Safe Harbor” provisions for SAR filers.
- Added a discussion on the FDIC’s white paper entitled, “Impact of New



FINE POINTS

By Camden R. Fine
President and CEO of ICBA

TAKING THE HARD PATH

" [ICBA's] comments hold out the promise of great savings for community banks. Every resource we have in Washington tells us that the bill has no chance of passage. Even our counterparts from the home state of the principal sponsor concur."

That statement was in a letter sent to banks in December 2009 characterizing ICBA's efforts to promote the FDIC-assessment-fairness provisions of the Bank Accountability and Risk Assessment Act of 2009 (H.R. 2897). The House bill would require that deposit-insurance assessments be calculated based on a bank's assets, not on its domestic deposits. But passing the legislation was a pipe dream, the naysayers said. Washington's public officials wouldn't listen or understand or care. And the legislation would distract from supposedly more important financial reform issues. Those were their arguments for doing nothing.

For ICBA, however, fighting all-out for deposit assessment fairness was never in doubt. Making the change involved correcting an inequity that was long overdue for community banks. Understanding the broad, bipartisan credibility and respect the nation's community bankers have in Washington (and remembering our big victory in winning an asset-based special assessment in 2008), ICBA knew that passing the legislation was more than possible. And we knew that adding \$4.5 billion to the bottom lines of the nation's community banks over the next three years by changing the assessment formula would be important in helping our members

Activities and Structures on Bank Failures" and highlighted factors that contributed to the four costliest institution failures from 1997 through 2002.

- Provided updated statistics and red flags on mortgage fraud, identity theft, check fraud and payment card fraud.
- Added a discussion on fraud risk management and detection methods based on AICPA guidance.
- Streamlined the internal controls section.

PUBLICATIONS, REPORTS, STUDIES, TESTIMONY & SPEECHES

- **OCC Law Dept. calendar and 2009 updates to permissible activities**

The Law Department releases its calendar year 2009 updates to "[Activities Permissible for a National Bank, Cumulative.](#)"^{xiv} and "[Significant Legal, Licensing, and Community Development Precedents for National Banks, Annual.](#)"^{xv}

- **OTS issue consumer mortgage loan brochure**

The FFIEC released the revised [BSA/AML Examination Manual.](#)^{xvi} The 2010 version further clarifies supervisory expectations since the August 24, 2007, update. [The Interagency Transmittal Letter](#)^{xvii} summarizes the significant updates.

- **FedFocusTM**

Among the articles in latest [FedFocusTM](#)^{xviii} is a discussion of the Treasury's green initiative that was explained in an above paragraph. Additionally, there are articles on ACH risk monitoring and about how a particular financial institution is adapting to Check 21.

- **FedFlashTM**

A new [FedFlashTM](#)^{xix} is available with the latest Federal Reserve Financial Services operational news and updates regarding products and services, processes, technical protocols, and contact information.

- **SAR Activity Review Trends Topics & Issues**

This [edition](#)^{xx} focuses on the casino and gaming industry, but also addresses several noteworthy topics that relate to other industries.

Comment: Although this edition relates to casinos and gaming, there is an overview (beginning on page 22) of how the companion piece "The SAR Activity Review – By the Numbers" (BTN) might be used by a financial institution interested in studying the prevalence of a particular type of suspicious activity. Financial institutions can use BTN to review the trends for the activity as reported in SARs. Because BTN is published bi-annually (covering Jan. 1 to June 30 and July 1 to Dec. 31), an institution can also see if there was an increase or decrease in the rate of reporting between 6-month intervals.

Important upcoming federal compliance dates:

- 06.01.2010 [Reg GG \(Prohibition on Funding of Unlawful Internet Gambling\)](#)^{xxi} – Requires non-exempt participants in designated payment systems to establish and implement written policies and procedures that are reasonably designed to identify and block or otherwise prevent or prohibit unlawful Internet gambling transactions. [Reg GG \(Extension of compliance date\)](#)^{xxii}
- ~~06.30.2010~~ TAG program expires. EXTENDED.
- 07.01.2010 Implementing FACT Act Accuracy & Integrity Rules: Deadline July 1, 2010
- 07.01.2010 [Reg. Z](#)^{xxiii} – This is the mandatory compliance date for all provisions of the final rule on [open end credit](#) that were not mandatory on February 22, 2010. Generally, the Fed retained a July 1, 2010 mandatory compliance date for those provisions originally adopted in the January 2009 Regulation Z Rule that are not requirements of the Credit Card Act.

recover from the financial crisis they did not cause.

So ICBA didn't hesitate or equivocate or waste time thinking about the possibility of failure. We simply acted, representing solely the interests of the nation's community banks.

On Dec. 11, 2009, the U.S. House of Representatives passed its sweeping financial reform package with the FDIC-assessment change included after months of heavy grassroots work by community bankers, ICBA and our allied state associations. Then on May 10, the U.S. Senate included, by a vote of 98-0, the same measure into its own financial reform package. The overwhelming Senate vote for the amendment virtually ensures that asset-based FDIC assessments will be included in any financial reform bill enacted by Congress.

As I write this column, the Senate is finishing its work to pass its financial reform package, legislation that recent polls show the American people are demanding. Still, ICBA is mindful that our work is not over. Neither financial reform nor the ICBA-promoted too-big-to-fail provisions nor the FDIC assessment change is law yet. And there are critical changes that must be made to any final financial reform package from Congress before ICBA can sign off on any final bill. But we are making progress.

The fight for asset-based FDIC assessments undeniably illustrates why there must always be a strong and vital ICBA to fight for community banks. Our association took the hard path when nobody else would, never flinching despite sometimes-extreme criticism, because, very simply, it was the right thing to do for the nation's community banks. Yes, we had faith, but we also held a strong position and a powerful grassroots army of community banks in our corner.

They said it couldn't be done. We've already proved the naysayers wrong.

- 07.01.2010 [Reg Z and Reg. AA \(Unfair or Deceptive Practices\)](#)^{xxiv} – A lender may not consider a credit card payment late unless statement is provided 21 days prior to due date. Requirements on how credit cards payments above minimum are allocated. Restriction on when credit card rates may change. Finance charges on previous billing cycles limited. Security deposits and fees limited.
- 07.01.2010 [Reg E](#) – The final rule limits the ability of a financial institution to assess an overdraft fee for paying ATM and one-time debit card transactions that overdraw a consumer's account, unless the consumer affirmatively consents, or opts in, to the institution's payment of overdrafts for these transactions. (Further amendments to [Reg E](#)^{xxv} and [Reg DD](#)^{xxvi} have been proposed to clarify the initial Reg E amendments.)
- 07.01.2010 [FACT Act \(Fair and Accurate Credit Transactions Act\)](#)^{xxvii} – Those furnishing consumer information to a consumer reporting agency must establish reasonable policies and procedures for implementing the guidelines in Appendix E.
- 08.22.2010 [Reg E](#)^{xxviii} - The final rules prohibit dormancy, inactivity, and service fees on gift cards unless: (1) the consumer has not used the certificate or card for at least one year; (2) no more than one such fee is charged per month; and (3) the consumer is given clear and conspicuous disclosures about the fees. Expiration dates for funds underlying gift cards must be at least five years after the date of issuance, or five years after the date when funds were last loaded.
- 10.01.2010 Reg Z – Higher priced mortgage loan escrow for manufactured homes (See Reg Z changes for 04.01.2010)
- 12.31.2010 [TAG](#) program expires.
- 01.01.2011 [FACT Act](#)^{xxix} – Generally require a creditor to provide a consumer with a notice when, based on the consumer's credit report, the creditor provides credit to the consumer on less favorable terms than it provides to other consumers. Alternatively, a creditor may provide such a consumer with a free credit score and information about their score.
- 12.31.2013 [FDIC deposit insurance](#)^{xxx} temporary limit increase to \$250,000 expires.
- Comment: Distribute this calendar to your CEO, CFO, Compliance Officer, and Operations Officer.***
- Federal compliance dates from the not-so-distant past:**
- 03.31.2010 [TALF program expires](#)^{xxxi}.
- 04.01.2010 [Reg. Z](#)^{xxxii} – Escrow on higher priced loans (Specifically, [12 CFR 226.35\(b\)\(3\)](#)^{xxxiii} is effective April 1, 2010.)
- 02.27.2010 [Reg. CC](#)^{xxxiv} -- These amendments reflect the restructuring of check-processing operations within the Federal Reserve System. Subsequent to these amendments, there will only be a single check-processing region for purposes of Regulation CC and there will no longer be any checks that are nonlocal.
- 02.22.2010 [Reg Z](#)^{xxxv} . – Amendments establish a number of new substantive and disclosure requirements pertaining to open-end consumer credit plans, including credit card accounts. This is the mandatory compliance date for the portion of § 226.5(a)(2)(iii) regarding use of the term “fixed” and for §§ 226.5(b)(2), 226.7(b)(11), 226.7(b)(12), 226.7(b)(13), 226.9(c)(2)(except for 226.9(c)(2)(iv)(D)), 226.9(e), 226.9(g) (except for 226.9(g)(3)(ii)), 226.9(h), 226.10, 226.11(c), 226.16(f), and §§ 226.51-226.58. The compliance date for all other provision of this final rule is 07.01.2010.
- 02.14.2010 [Reg. Z](#)^{xxxvi} – Amendments revising the disclosure requirements for



By Jim MacPhee
Chairman of ICBA

BETTER, FASTER, EASIER

Ever see those headlines on fitness magazines: “Better, Faster, Stronger”? How about “easier” or “more cost-efficient”? All those adjectives might apply to the fabulous array I hope you saw in the exhibition hall at the ICBA National Convention and Techworld. It was an amazing sight—221 exhibitors gathered to show us the latest products and services to help community banks run more efficiently and effectively.

It’s no surprise that they came to see us: ICBA has almost 5,000 members representing 268,000 employees nationwide. We should see these vendors, too. After all, as ICBA members, we all understand collective bargaining and the power of aggregation in gaining parity with our largest competitors. Likewise, we gain a lot by sticking together and purchasing from vendors who support us.

Last year more than 90 percent of our members took advantage of ICBA services, realizing millions through vendor discounts to our member banks. With 25 Preferred Service Providers, ICBA procures those discounts on hundreds of products and services on your behalf. We’re talking real money for your bottom line. Did you know that Travelers property-and-casualty insurance alone paid nearly 1,200 community banks a dividend of \$3.6 million?

And in 2009, ICBA Reinsurance—our captive credit-life-insurance subsidiary—paid its seventh straight dividend, \$150,000, representing 5.7 percent of earned surplus for those shareholders who posted positive underwriting results. More than 73 percent of participants qualified to

private education loan become mandatory.

- 01.19.2010 [Reg. Z^{xxxvii}](#) – The purchaser or assignee that acquires a mortgage loan must provide the required disclosures in writing no later than 30 days after the date on which the loan is sold or otherwise transferred or assigned. (This rule was effective on 11.20.2009, but compliance was optional until 01.19.2010.)
- 01.01.2010 [Reg. X \(RESPA\)^{xxxviii}](#) – GFE and HUD-1 both change. Fee variance between GFE and HUD-1 limited based on fee type. Except with change of circumstances and new disclosures (within 3 business days of change), lender is locked into the fees originally disclosed for 10 business days after such disclosure.
- 01.01.2010 [Reg. DD \(Truth-in-Savings\)^{xxxix}](#) – Disclose overdraft fees for statement period and YTD on periodic statements. Balances on automated systems (e.g. ATMs) must not include overdraft protection amount.
- 01.01.2010 [Reg. S^{xl}](#) – Update the fees to be charged for producing records and takes account of recent advances in electronic document productions.
- 01.01.2010 Effective date of TAG participant opt-out.
- 12.31.2009 [GLBA \(Model Privacy Form\)^{xli}](#) – The agencies adopted a model privacy form that financial institutions may rely on after 12.31.2010 as a safe harbor to provide disclosures under the privacy rules.
- 12.30.2009 Prepay quarterly risk-based FDIC assessments for the fourth quarter of 2009, and for all of 2010, 2011, and 2012, on December 30, 2009, along with risk-based assessment for the third quarter of 2009.
- 12.01.2009 **COMPLIANCE DATE EXTENDED TO 06.01.2010.** [Reg. GG \(Unlawful Internet Gambling Act\)^{xlii}](#) – Must send required notice to existing customers. Must perform due diligence at account opening and have procedures for dealing with violations.
- 10.01.2009 [Reg. C \(HMDA\)^{xliii}](#) – Loans requiring a rate spread must use Reg. Z’s new higher priced loan definition.
- 10.01.2009 [Reg. Z \(TIL\)^{xliv}](#) – Higher priced mortgage loan consumer protections; prohibits appraiser influence; prohibits unfair/deceptive servicing standards on dwelling secured closed end loans; advertising rules open & closed end loans; changes on HOEPA loan criteria.
- 09.18.2009 [New International ACH Transaction \(IAT\) rule^{xlv}](#) requiring all international ACH payments to be uniquely identified.

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receive the dividend. Now that's aggregation and real bottom-line improvement.

While that should be enough to get your attention, remember also that our ICBA Services Network staff did the due diligence, saving you untold hours of investigating these firms to ensure that each is the kind of vendor with which you'll feel secure doing business.

I am amazed at how many bankers make a substantial purchase in equipment, software, even a whole new office without first checking the ICBA preferred-vendor list or the ICBA Corporate Associate Member Directory (you should have received one in April). That publication lists more than 320 vendors alphabetically by category to help you obtain your best deal. If for no other reason than to comparison shop, make it part of your routine to always have key staff members check with these vendors first before making a purchase. You won't be sorry.

As I stated in last month's "From the Top" column, "I pledge to do all that I can to protect the community bank franchise." One way I can help us do that is by passing on to you proven ideas to bring value to your bottom line. One of those, the result of a lot of hard work, is the family of products and services offered by the ICBA Services Network.

I always look for them in our annual directory, and you should, too. Those vetted vendors are one of the many benefits of our ICBA membership.

ⁱ <https://www.fdic.gov/edie/index.html>

ⁱⁱ <http://www.fdic.gov/news/news/financial/2010/fil-16-2010a.pdf>

ⁱⁱⁱ <http://www.fdic.gov/news/news/financial/2010/fil-16-2010b.pdf>

^{iv} http://www.ots.treas.gov/_files/482132.pdf

^v http://www.ots.treas.gov/_files/25345.pdf

^{vi} <http://www.treasury.gov/press/releases/tg644.htm>

^{vii} http://www.fincen.gov/statutes_regs/guidance/pdf/fin-2010-a005.pdf

^{viii} <http://www.federalreserve.gov/boarddocs/srletters/2010/sr1008.htm>

^{ix} <http://www.occ.treas.gov/fr/fedregister/75fr23764.pdf>

^x http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=635f26c4af3e2fe4327fd25ef4cb5638&tpl=/ecfrbrowse/Title12/12cfr206_main_02.tpl

^{xi} <http://edocket.access.gpo.gov/2010/pdf/2010-10196.pdf>

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- xii http://www.frbservices.org/files/communications/pdf/check/051110_pricing_letter.pdf
- xiii http://www.ots.treas.gov/_files/74874.pdf
- xiv <http://www.occ.treas.gov/corpapps/bankact.pdf>
- xv <http://www.occ.treas.gov/sigpre.pdf>
- xvi http://www.ffic.gov/bsa_aml_infobase/documents/BSA_AML_Man_2010.pdf
- xvii <http://www.fdic.gov/news/news/financial/2010/fil10017a.html>
- xviii <http://www.frbservices.org/fedfocus/index.html>
- xix <http://www.frbservices.org/fedflash/index.html>
- xx http://www.fincen.gov/news_room/rp/files/sar_tti_17.pdf
- xxi <http://www.federalreserve.gov/newsevents/press/bcreg/bcreg20081112a1.pdf>
- xxii <http://edocket.access.gpo.gov/2009/E9-28746.htm>
- xxiii <http://edocket.access.gpo.gov/2009/pdf/E8-31185.pdf>
- xxiv <http://edocket.access.gpo.gov/2009/pdf/E8-31186.pdf>
- xxv <http://edocket.access.gpo.gov/2010/pdf/2010-3720.pdf>
- xxvi <http://edocket.access.gpo.gov/2010/pdf/2010-3719.pdf>
- xxvii <http://www.ftc.gov/os/2009/07/R611017factafn.pdf>
- xxviii <http://www.federalreserve.gov/newsevents/press/bcreg/bcreg20100323a1.pdf>
- xxix <http://edocket.access.gpo.gov/2010/pdf/E9-30678.pdf>
- xxx <http://www.fdic.gov/deposit/deposits/difactsheet.html>
- xxxi <http://www.federalreserve.gov/monetarypolicy/20090817a.htm>
- xxxii <http://edocket.access.gpo.gov/2008/pdf/E8-16500.pdf>
- xxxiii <http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr;sid=54084c95801c7a737f1e9482f547274f;rgn=div2;view=text;node=20080730%3A1.19;idno=12;cc=ecfr;start=1;size=25>
- xxxiv <http://edocket.access.gpo.gov/2010/E9-31254.htm>
- xxxv <http://www.federalreserve.gov/newsevents/press/bcreg/bcreg20100112a1.pdf>
- xxxvi <http://www.federalreserve.gov/newsevents/press/bcreg/20090730a.htm>
- xxxvii <http://edocket.access.gpo.gov/2009/E9-27742.htm>
- xxxviii <http://www.hud.gov/offices/hsg/ramh/res/finalrule.pdf>
- xxxix <http://edocket.access.gpo.gov/2009/pdf/E8-31183.pdf>
- xl http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=635f26c4af3e2fe4327fd25ef4cb5638&tpl=/ecfrbrowse/Title12/12cfr219_main_02.tpl
- xli <http://edocket.access.gpo.gov/2009/E9-27882.htm>
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