



**Marketing Related CIP Threads from BankersOnline.com**

**Lobby and Desk CIP Notices**

Should "Member FDIC" and "Equal Housing Lender" be on these notices? I sure it does not hurt, but is necessary? Fast answer please.

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It's not on ours.

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While you could bundle the Member FDIC and CIP, as they are often where new deposit accounts are opened, adding the EHOL and CIP would be appropriate for the loan area. It might be deemed over-kill to put all 3 together as the EHOL needs to be 11" x 14" to comply with its requirements and that would be too much in non-essential areas. Also, combining the FDIC and CIP makes sense to me in the new accounts area. I wouldn't do it at the teller line or drive-up unless you open accounts there.

Bottom line, they can be bundled if you want but it isn't necessary. It depends on what works for you as you have flexibility here.

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I believe the original post meant the logotype, not the notice. While I can't believe anyone would take the notice as a solicitation for either loans or deposits, creative branch marketers might use the blank space on the back for such a purpose.

I see no harm in both the Member FDIC and EHL logotype on just about anything (short of tattooing either on one's person).

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You are correct. I am referring ONLY to the logos used for advertising, not the full notices. And yes, I too think that these CIP notices should not be perceived as advertising. Thanks.

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I can see combining it with the FDIC notice in proper size, but see little reason to add the EHOL logo to it as it would serve little purpose, especially if it detracted from the CIP notice itself. Assuming it wouldn't, there is nothing to prohibit it.

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Think about all of the possible places that the notices will be used. For instance if you have a broker/dealer or a trust department that will be using the same notices as are used in the retailing banking or mortgage lending areas, leave the "Member FDIC" and "EHL logo" off of the notice. If

however you will only be using the notices in a retail and/or lending area I see no harm in adding the legends.

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### **CIP Notice - Allowable Modifications**

One of our business units has a strong preference for removing references to terrorism and money laundering from our CIP notice for their borrowers. I may run this by our regulator to get their opinion. Has anyone had any input from the FDIC in particular or other regulators on this question? I know at least one other poster has shared notice language without any reference to money laundering or terrorism. Your input is appreciated.

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The notice requirements are that the bank provide customers with adequate notice that the bank is requesting information to verify their identities. The regulation indicates that notice is adequate if the bank generally describes the identification requirements of this section. While the sample notice mentions money laundering and terrorism, the regulation does not dictate the inclusion of those terms. Technically, you could take them out.

However, the reason that so many commenters on the proposed regulation asked for a sample was to avoid the possibility that individual examiners would feel free to critique language, format, etc. While it is never referred to as a model form, clearly use of the sample language eliminates potential criticisms. Any modification opens the door to criticism from an examiner who "knows better."

Personally, I believe your folks are over thinking the issue. First, they are assuming people will read it. Second, the terms they want to delete accurately reflect the impetus for the requirement.

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### **CIP Notice in Spanish?**

I was wondering if anyone is planning on also preparing the CIP notice in Spanish for the new accounts desks, teller line, etc.???

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if you also wanted One in Arabic , just let me Know.

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We have so many different languages (and dialects of languages) spoken by our customers (and staff), if we tried to post them in every language, we'd have new wallpaper. So we're sticking with just good ol' American English.

English, Spanish, Tagalog, Hindi, Japanese, Cantonese, Mandarin, Thai, German, French, Russian, Arabic, Persian.... the list goes on and on.

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We are in South Florida and sticking to English only as well.

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If you open accounts in another language, it only seem appropriate. That is, don't provide some disclosures in multiple languages but this disclosure only in one.

But I have no intention of introducing a Spanish version. You'd have to have English, so you double+ your requirements this way, but would better serve a market if you already do more than English.

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California has this law but it only applies to consumer lending. We have 2-3 branches that conduct 97-99% customer service in Spanish. We will be posting a notice that lending activity will only be conducted in English unless the customer brings in their own adult translator.

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Our offices are in the U.S.A., so we're doing ours in English.

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### **CIP Notice**

Just curious - Is anyone just posting a lobby sign? From other banks I have been in (that have already posted signs), it looks like they are posting signs everywhere accounts are opened. The reg says "Notice is adequate if the bank generally describes the identification requirements of this section and provides the notice in a manner reasonably designed to ensure that a customer is able to view the notice, or is otherwise given notice, before opening an account." If they have to walk past the sign in the lobby before opening a new account, is it not reasonable to assume that they were able to view the notice?

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We are not posting a lobby sign because of aesthetics. We have at least one person who thinks they look junky. We are doing the notices at each new accounts desk. I would prefer a lobby notice but they didn't ask me.

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My goal will be to add it to the Fed wall as a catch all, but we will likely depend on a laminated version at the applicable areas near the FDIC signs and at loan areas as well. It was determined that tent cards will be too easily misplaced and torn up as they try to see if that pen really writes.

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No lobby poster, we made up these really cute patriotic (our bank colors are RW&B, too) desk cards that are inserted into acrylic holders.

And Andy, they can't write on these!

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Our New Accounts desks are already too cluttered. We plan to use notices at the time the customer opens an account.

We will probably add a notice on the wall as well.

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When would you give the notice? While I don't believe 326 is as specific as I would want it, it should be prior to doing CIP rather than just prior to opening, based on the content of the notice.

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Lobby with Fed disclosures and at the desk where accounts are opened.

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Most of the customer service people have glass tops on the desks - notice slides right underneath in front of the customer.

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We have a notice on letterhead in an acrylic holder that is posted at all new accounts desks. We are also toying with the notion of getting some flyers that people can take with them if they have problems with it.

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Maria, just curious where you might have found the acrylic holders?

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We used to buy them from a printing vendor. Some were mountable and some were shaped with a base so it could stand on its own.

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Quote:

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Maria, just curious where you might have found the acrylic holders?

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Jody, our Marketing guy took care of ordering all of that stuff, I'll check with him and get back to you.

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Jody, he got them through a subdivision of our advertising agency: Distro Sales (Elaine) can be reached at (908)686-7500.

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Quote:

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Maria, just curious where you might have found the acrylic holders?

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Is anyone putting the notice on their website if it is an information only website?

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You could put it there, but what's the purpose? If the "manner in which the account is opened" is offline, there's no reasonable expectation that the notice is reaching new account applicants (since they all must walk into a branch to apply.) Although there's nothing to gain, this practice

could have a downside. You may be criticized if you have a nonconforming version of the notice on the web site. I'd nix this idea as an unnecessary risk, not over compliance.

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Does anyone really believe that one lobby notice would not be adequate when the text of the regulation specifically gives "a notice in the lobby" as an example? Most banks have more than one location where a customer would open a deposit account or obtain a loan, so if they really wanted a notice at every desk, I think they would have stated that. I know you're playing it safe if you put one at every desk, but it sure seems like a waste of money when it's not required.

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I agree, we are not going to put it on the website but I was checking the litmus test of others.

As far as lobby notices go, I proposed that we post a notice in each lobby, trust department, and in the reception area of the lending department. We have run out of space to put desk tents up and who wants to hand out another disclosure? I would probably get mauled if I suggested that after the Privacy Notice/Insurance disclosures.....too much paperwork!