

## 5 REQUIRED TRAINING TOPICS

ACT	FREQUENCY	WHO IS <u>REQUIRED TO</u> <u>BE TRAINED?</u>	RULE	REQUIREMENT
<b>BANK PROTECTION ACT</b> <ul style="list-style-type: none"> <li>Minimum Security Devices and BSA Compliance</li> </ul> (includes physical bank security)	None stated - other than "initial" and "periodic"...	Affected staff	<ul style="list-style-type: none"> <li>OCC 12 CFR 21.3 (c)(1)(iii)</li> <li>FRB 12 CFR 208.61(c)(1)(iii)</li> <li>FDIC Part 323.3</li> </ul>	<i>Provide for Initial and periodic training of officers and employees in their respective responsibilities in proper employee conduct before and after a robbery, burglary or larceny.</i>
<b>BSA - AML</b> <ul style="list-style-type: none"> <li>Minimum Security Devices and BSA Compliance</li> </ul>	No longer appears to be annual...no references in regulation or Examiners' exam manuals	Affected staff - However, it's expected by examiners that all parties receive training on some level., including BOD.	<ul style="list-style-type: none"> <li>OCC 12 CFR 21.21(c)(4) Minimum Security Devices and BSA Compliance</li> <li>FRB 12 CFR 208.63(c)(4) Security and BSA Compliance</li> <li>FDIC Part 326.8(c)(4)- Subpart B to Minimum Security Devices and BSA Compliance</li> </ul>	<i>Provide training for appropriate personnel</i> <ul style="list-style-type: none"> <li>Part of statement of "Contents of compliance program" which includes controls, testing, BSA officer</li> </ul> <i>Train employees to be fully aware of their responsibilities under the BSA regulations and internal policy guidelines. Incorporate BSA compliance into job descriptions and performance evaluations.</i> <ul style="list-style-type: none"> <li>FFIEC's Joint Guidance on BSA-AML Exam Procedures 6/05</li> </ul>
<b>CIP</b> (Part of BSA)	Same as above	Same as above	Same as above	Same as above
<b>REG CC (EXPEDITED FUNDS)</b>	None stated	Affected staff	12 CFR 229.19(f)	<i>Each bank shall establish procedures to ensure that the bank complies with the requirements of this [Act] and shall provide each employee who performs duties subject to the requirements of this [Acct] with a statement of the procedures applicable to that employee</i> <ul style="list-style-type: none"> <li>Monitor compliance with Regs.</li> </ul>
<b>INFORMATION SECURITY-CUSTOMER PRIVACY</b> (Interagency Guidelines for Safeguarding Customer Information)	None stated	All staff	<ul style="list-style-type: none"> <li>OCC 12 CFR 30, Appn B-III. C., 1. 3</li> <li>FRB 12 CFR 208.3</li> <li>FDIC Part 364.101</li> </ul>	<i>Train staff to implement the bank's information security program.</i> <ul style="list-style-type: none"> <li>Program to be designed to ensure security and confidentiality of customer info; "all staff" is inferred</li> <li>Monitor systems and procedures</li> <li>Control risks; limit access and provision of information, etc.</li> </ul>

As for other regulations – "Training" is required by all the agencies. It's expected by the agencies that bankers are appropriately trained and general comments to that effect are in their various Exam manuals. (Lenders must know the loan rules and deposit associates, the deposit rules, etc.....) There are no regulatory requirements, other than stated above. The bank WOULD be cited if regulatory training wasn't available to or accessed by, the employee as appropriate to their position.

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