

Compliance Review Sheet - Signage

Date _____

Facility _____

Signage Required	(Include all branches and drive-up facilities)																															
	Location					Location					Location					Location																
A. CIP (provide or post for new accounts)																																
B. CRA Public Notice																																
C. 5-in-1 Employment Poster																																
D. Equal Housing Lender Poster	1	2	3						1	2	3						1	2	3						1	2	3					
E. FDIC Dep. Ins Notices (current \$250k)	1	2	3	4	5	1	2	3	4	5	1	2	3	4	5	1	2	3	4	5	1	2	3	4	5							
F. Funds Availability Policy																																
G. HMDA Notice of Availability																																
H. Loan Agreements (Texas)																																
I. Rate Boards																																
J. FCRA Notice																																
K. ATM Surcharge Notice																																
L. Sale of Checks (Texas)																																
M. Customer Identification Program Notice																																
N. Notice of Employee Rights (2 req)																																

- A. CIP procedures require providing adequate notice the bank is requesting information to verify customer identities prior to opening account. May be given or posted 31 CFR 1020.220(a)(5)
- B. Community Reinvestment Act (CRA). Provide in each lobby, other than off premise electronic deposit facilities, the Public Notice described in 12 CFR 228.44 (12 CFR 25.44).
- C. Required to be visible to job applicants and employees, 42 USC 2000e-10(a). This poster should include five parts, and if not in a combined poster, individual signs *must be posted in the manager's office or lobby*. The five laws are: Equal Employment Opportunity Act, Fair Labor Standards Act, Employee Polygraph Protection Act, Family Medical Leave Act, and OSHA's Plain Language "It's The Law".
- D. Displayed in each bank lobby and where deposits are accepted or loans made. (Mark box for 1-lobby, 2-where deposits are accepted and 3-loan areas.) 24 CFR 110.15 (11"X14" with OCC address at bottom, refers to Handicap and Familial status.)
- E. Display at each station or window (incl. drop boxes, teller windows, New Accounts, drive-ups) where insured deposits are normally received, excluding automated service facilities such as ATMs, night depositories and POS. (Mark box for 1-Teller area, 2-Note Teller, 3-New Accounts, 4-Drive-up and 5-Other.) Signs must be 3"X7" in size. 12 CFR 328.2 & FDIC 93-42, 94-17.
- F. For banks routinely delaying availability of any deposited item, disclosure is required of several items in a conspicuous place in each location where deposits are accepted. This includes the abbreviated text on ATMs but excludes drive-ups. These disclosures are contained in our Facts About Funds Availability brochure that doubles as the posted notice. 12 CFR 229.18
- G. Home Mortgage Disclosure Act (HMDA). General notice of availability posted in each home office and physical branch offices located in an MSA. 12 CFR 1003.5(e). (1-1-04 add "ethnicity", replace "gender" with "sex" based on suggested text.)
- H. Requires loan agreement be written for loans in excess of \$50,000. TX Bus. & Comm. Code 26.02
- I. Indoor signs are exempt from many advertising requirements. If a rate is stated it will use the term "annual percentage yield" or "APY" and contain a statement advising consumers to contact an employee for further information on terms and fees. 12 CFR 1030.8(e)(2)
- J. Fair Credit Reporting Act (FCRA) requires that a consumer be allowed to notify the bank of an error their consumer report. If a notice is posted informing consumers where to direct their notice, they may not be delivered to just any employee and must be properly directed. 623(a)(1)(C)

- K. If you as an ATM owner/operator impose a fee to complete a transaction or inquiry, you must disclose on the ATM that a fee may be imposed. 12 CFR 205.16(c)(1). A screen or paper notice is required similar, but also discloses the fee amount 12 CFR 205.16(c)(2). See (d) for an exemption due to non-capable ATMs.
- L. TEXAS - As an agent for a seller of checks (i.e.Traveler's), notice on where to file complaints is required, State banking commission 7TAC 33.51.
- M. Written or oral notice must be provided informing customers that the bank is requesting information to verify their identity. 31 CFR 103.121(b)(5)
- N. **1)** Executive Order 13496 [Notice of Employee Rights](#) under the National Labor Relations Act, the primary law governing relations between unions and employers in the private sector. See 29 CFR Part 471. Banks need due to FDIC ins, savings bonds, TTL accounts and gov't contracts. Post the notice conspicuously in offices where employees covered by the NLRA perform contract-related activity, including all places where notices to employees are customarily posted both physically and electronically. **2)** [Employee Rights under the NLRA](#) See section 7 of the NLRA, [29 U.S.C. 157](#)

Comments: _____

_____ ✓ ---In compliance

_____ X -- Violation

_____ O -- Questionable

_____ - ---Not applicable