

Monthly Bank Regulatory Compliance Burden

Month:

Bank:

Bank Assets (\$mills):
 Number of Shareholders (000s):

No. of Branches (including Headquarters):
 Number of Shares Outstanding (000s):

Bus. Days in Month:
 Average Market Price per Share:

GENERAL MANAGEMENT REGULATIONS

Direct Compliance		Bank Branches		Departments Other than Compliance			
Hours Spent	Av. Hrly. Wage (\$)	Hours Spent	Av. Hrly. Wage (\$)	Hours Spent	Av. Hrly. Wage (\$)	Number of Departments	Departments
Weekly and/or Monthly		Weekly and/or Monthly		Weekly and/or Monthly			

Gramm-Leach-Bliley Act (GLBA) & Reg P

Privacy notices: annual mailout										
Privacy notices: opt-out maintenance										
Safeguarding customer information, including physical, administrative and technical features										
Vendor contracts: initial monitoring and mailing										
Vendor contracts: maintenance										
Other (specify)										

Information Technology (IT) Security

Corporate governance										
Continuity planning										
Financials on critical vendors										
Other (specify)										

Holding Company

Duplicate call & Y-9C reports for a single holding co. with no activity/debt at the parent										
Other (specify)										

Consumer Protections in Sales of Insurance

Providing disclosures to customers										
Other (specify)										

In-House Training for All Staff

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Non-Staff Compliance Expenditures

	Average Monthly Cost		Average Monthly Cost
Outside consultants, attorneys and auditors	<input type="text"/>	Printing, mailing, and production costs	<input type="text"/>
Training (Seminars, workshops, schools)	<input type="text"/>	Hardware, software and system maintenance supporting compliance	<input type="text"/>
Training materials (guide, books, subscription)	<input type="text"/>	Other (specify)	<input type="text"/>

Regulatory Compliance Costs Not Included Elsewhere

Other (specify)										
Other (specify)										
Other (specify)										

DODD FRANK/Sarbanes-Oxley Act (S-Ox*)

	Hours per Year	Average Hourly Salary	Dollars per Year	% Incr. from Prior Yr.
Management	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Staff	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Board	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Internal audit	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
External audit	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Legal	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

LENDING REGULATIONS

Direct Compliance		Bank Branches		Departments Other than Compliance			
Hours Spent	Av. Hrly. Wage (\$)	Hours Spent	Av. Hrly. Wage (\$)	Hours Spent	Av. Hrly. Wage (\$)	Number of Departments	Departments
Weekly and/or Monthly		Weekly and/or Monthly		Weekly and/or Monthly			

CRA for Large Banks (over \$250 million)

Monitoring, research & documentation							
Small business & farm loan monitoring, research and documentation							
Maintaining CRA public file							
CRA performance context							
Filing documentation							
Other (specify)							

FCRA and FACT Act

Fraud alerts							
Handling disputes and blocking info.							
Providing cr. scores to mort. applicants							
Customer notification of negative info.							
Avoiding use of medical information							
Other (specify)							

Home Mortgage Disclosure Act (HMDA)

Paperwork on each loan (LAR report)							
Avg. of annual reporting per month							
Other (specify)							

Flood Diaster Protection Act (FDPA)

assistance with customer FEMA, LOMA and LOMR requirements							
Other (specify)							

Reg B (Equal Credit Opportunity Act)

Monitoring to avoid discrimination							
Adverse action notices (incl. FCRA)							
Other (specify)							

Reg O (Insider Lending)

Avg. of annual reporting per month							
Loan limit monitoring							
Board prior approval							
Correspondent bank loans							
Monitoring "related interests"							
Other (specify)							

Reg Z (Truth-in-Lending)

APR disclosure							
Monitoring 3-day rescission rule							
Servicing disclosure							
Other (specify)							

Home Owners Equity Protection Act (HOEPA)

Completion of calculation worksheet							
Other (specify)							

Real Estate Settlement Procedures Act (RESPA)

Servicing disclosure							
Other (specify)							

Regulatory Compliance Burden for January 1900

Regulatory Issue	Direct Compliance		Branches		Depts Other than Compl		Total	
	Hours	Costs	Hours	Costs	Hours	Costs	Hours	Costs

Bank-Specific Regulations

DEPOSIT REGULATIONS

Bank Secrecy Act

Anti-money laundering paperwork
 CTR reporting
 SAR reporting
 FinCen requests
 OFAC list and monitoring
 US Patriot Act: Customer Identification Program
 US Patriot Act: Monitoring High-risk customers

Fair Credit Reporting Act (FCRA)

Adverse action notices

Reg CC (Funds Availability)

Schedule notices (initial, ATM, teller windows)
 Determinates of hold notices

Reg D (Reserve Requirements)

Monitoring excessive withdrawals to MMDA's
 Losses on sterile reserves

Reg DD (Truth in Savings)

Accountant disclosures
 Periodic statement disclosures
 Change in term/CD renewal disclosures
 Advertising

Reg E (Electronic Funds Transfers)

Error Resolution
 Mailing provisional credit letters to customers

LENDING REGULATIONS

CRA for Large Banks (over \$250 million)

Investment, services monitoring, research, documentation
 Small business/farm loan monitoring, research, documn.
 CRA public file maintenance
 CRA performance context
 Filing investments, services and loan documentation

FCRA and FACT Act

Fraud alerts
 Handling disputes and blocking information
 Providing credit scores to mortgage applicants
 Customer notification of negative information
 Avoiding use of medical information

Home Mortgage Disclosure Act (HMDA)

Paperwork required on each loan (LAR report)
 Average of annual reporting per month

Flood Diaster Protection Act (FDPA)

Bank assistance with customer FEMA, LOMA and LOMR
 requirements (elevation survey, certifications, etc.)

Reg B (Equal Credit Opportunity Act)

Monitoring adds, lending, etc. to avoid discrimination
 Adverse action notices (including FCRA)

Reg O (Insider Lending)

Average of annual reporting per month
 Loan limit monitoring
 Board prior approval
 Correspondent bank loans
 Monitoring "related interests"

Reg Z (Truth-in-Lending)

APR disclosure
 Monitoring 3-day rescission rule
 Servicing disclosure

Home Owners Equity Protection Act (HOEPA)

Completion of calculation worksheet

Real Estate Settlement Procedures Act (RESPA)

Servicing disclosure

Regulatory Compliance Burden for January 1900

Regulatory Issue	Direct Compliance		Branches		Depts Other than Compl		Total	
	Hours	Costs	Hours	Costs	Hours	Costs	Hours	Costs

GENERAL MANAGEMENT REGULATIONS

Gramm-Leach-Bliley Act (GLBA) and Reg P

Privacy notices: annual mailout
 Privacy notices: Opt-out maintenance
 Safeguarding customer information, including physical,
 Vendor contracts: Initial monitoring and mailing
 Vendor contracts: Maintenance

Information Technology (IT) Security

Corporate governance
 Continuity planning
 Financials on critical vendors

Holding Company

Single bank holding company quarterly Y-9C filing

Consumer Protections in Bank Sales of Insurance

Providing disclosures to customers

In-House Training

Total training time for staff for all regulations

Non-Staff Compliance Expenditures

Outside consultants, attorneys and auditors for regulatory compliance
 Training (AIB, seminars, workshops, schools) and training materials
 Printing, mailing, and production costs
 Technical support for compliance

General Regulations

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Board, management and staff time
 Internal audit
 External audit
 Legal

Other Regulaotry Burdens

Total Regulatory Burden

Impact on Profitability

	Annual Hours	Annual Cost	Per Share	Impact on RoA	
Bank-Specific Regulations					Bank Data
Bank Secrecy Act					Bank Assets (\$Millions)
Consumer Protections in Sales of Insurance					Market Capitalization (\$M)
Fair Credit Reporting Act (FCRA) and FACT Act					Number of Branches
Flood Disaster Protection Act					Number of members
Gramm-Leach-Bliley Act (GLBA)					
Holding Company					
Home Mortgage Disclosure Act (HMDA)					
Home Owners Equity Protection Act (HOEPA)					
Information Technology (IT) Security					
In-House Training					
CRA for Large Banks (over \$250 million)					Business Days in Month
Non-Staff Compliance Expenditures					21
Real Estate Settlement Procedures Act (RESPA)					
Regulation B (Equal Credit Opportunity Act)					Bus. weeks in the month
Regulation CC (Funds Availability)					4.2
Regulation D (Reserve Requirements)					
Regulation DD (Truth in Savings)					
Regulation E (Electronic Funds Transfers)					
Regulation O (Insider Lending)					
Regulation Z (Truth-in-Lending)					
Other Regulatory Burdens					
Dodd Frank					

Total Regulatory Burden