

**MINIMUM REQUIRED DATA ELEMENTS  
FOR  
FBO OR SPECIAL PURPOSE BANK ASSESSMENT**

*This document represents the minimum required data elements to be considered when assessing the activities of a foreign banking organization or a special purpose bank to determine whether a compliance or CRA examination is warranted. The data elements may be collected from sources within the Reserve Bank, by forwarding questionnaires to institution management, or through checklists completed by Reserve Bank examiners.*

**GENERAL INFORMATION**

1. Name, location, and RSSD number of institution
2. Date of assessment
3. Name of EIC or institution personnel completing the questionnaire/checklist
4. Type of institution:
  - Branch (state or national chartered)
  - Agency
  - Edge Act Corporation
  - Representative Office
  - Special Purpose Bank
  - Other
5. Is the institution insured by the FDIC?
6. Is the branch an uninsured state branch (other than a limited branch) of a foreign bank that resulted from an acquisition described in section 5(a)(8) of the International Banking Act of 1978 (12 USC 3103(a)(8))?
7. What is the purpose and principle business of the institution?
8. What is the relationship between the institution and the parent bank/holding company?
9. What other U.S. operations of the parent company exist?
10. Who serves as legal counsel for the institution regarding issues related to the Right to Financial Privacy Act?
11. Who serves as the internal auditor for the institution?
12. Who serves as the Compliance Officer for the institution?
13. Does the institution maintain an Internet website?
  - a. If yes to question 13 in this section, is the website transactional?
  - b. If yes to question 13 in this section, please provide the URL for the website.

# ATTACHMENT I

## LENDING

1. Does the institution originate or make recommendations on loan applications, including accommodation loans?
  - a. If yes, has there been new activity since the previous assessment/examination?
    - \_\_\_\_\_ number of loans
    - \_\_\_\_\_ dollar amount of lending activity
    - \_\_\_\_\_ types of loans (consumer, residential mortgages, home equity, home improvement, commercial, shared national credits)
2. Does the institution rely on information from a credit reporting agency in denying consumer credit?
3. Does the institution report credit history information to credit reporting agencies?
4. Does the institution believe that it is exempt from CRA? Has the institution sought confirmation of this status from the Federal Reserve System?

## LEASING

1. Does the institution offer consumer leasing credit?

## FAIR DEBT COLLECTION PRACTICES

1. Does the institution act as a collection agency on behalf of others?

## OPERATIONS

1. Does the institution offer consumer deposit accounts? If yes, describe the types of accounts (time, demand, CDs, MMDAs, NOW) and any customer limitations.
2. Does the institution accept any requests for customer records from a federal agency (excluding the IRS or the US Grand Jury)?
3. Does the institution accept any checks drawn on U.S. financial institutions and delay the availability of those funds?
4. If yes to questions 1, 2, 3, or 4 in this section, has there been any new activity since the previous assessment/examination?
5. Does the institution impose an early withdrawal penalty on time deposits and CDs?
6. Does any U.S. office or any offshore office, managed by a U.S. office of your institution, offer non-deposit investment products (e.g. mutual funds, fixed or variable annuities, asset allocation products) for sale? If so, what is the nature of these products and through what departments or branches are they made available?
7. Does the institution offer ACH or ATM services, credit cards, or access devices?

## ATTACHMENT I

### AUDITS & PROCEDURES

1. If the institution engages in any activity covered in this questionnaire, does the institution have internal procedures and audit provisions to monitor its compliance with applicable consumer laws and regulations?
  - a. If yes to question 1 in this section, what was the date of the institution's most recent audit?
  - b. If yes to question 1 in this section, what was the scope of the compliance audit?
  - c. If yes to question 1 in this section, briefly summarize any audit findings.

### PRIVACY

1. Does the institution have a privacy policy?
2. Does the institution offer retail consumer products?
  - a. If yes to question 2 in this section, does the institution provide an initial privacy disclosure prior to providing a consumer service or product?
  - b. If yes to question 2 in this section, does the institution share customer information with third party non-affiliates, offering the customer an opt-out opportunity?
  - c. If yes to question 2 in this section, does the institution provide retail customers with an annual privacy policy notice?