

FIRMA CONFERENCE - ORLANDO 2019

FDIC
Policy and Program and
Development
Section

DISCLOSURE

The views and opinions expressed in this presentation are my own, and do not necessarily represent those of the Federal Deposit Insurance Corporation.

RMS TRUST UPDATE

- ◉ Trust Department Data
- ◉ Examination Issues
- ◉ FIRMA Member Questions

TRUST DEPARTMENT'S SUPERVISED

○ Number

- Total
- Per region

○ Assets Under Management

- Personal Trust
- Employee Benefit
- Investment
- Corporate
- Foundations and Endowments

TRUST TOP 5 ITEMS IDENTIFIED

- Risk Management
- Management
- Audit
- Valuations
- IRAs

RISK MANAGEMENT

○ Risk Assessments

○ Metrics

- Performance
- Risk Indicators

MANAGEMENT

- ◉ Trust Policies continue to need improvements
- ◉ Inadequate Due Diligence
- ◉ Concentrations - retention letters
- ◉ Digital Assets - crypto currencies, other
- ◉ Outsourcing Trust Operations

AUDIT

- ⦿ Lack of Adequate Audit
 - Ineffective or Complete Lack of Audit
 - Lack of Qualified Trust Auditors
 - Internal
 - External
 - Timing - not conducted timely
- ⦿ Not documented in Trust Committee Minutes

VALUATIONS

- ◉ Unique Assets
- ◉ Closely Held Assets
- ◉ Illiquid Assets
- ◉ Managed Assets

INDIVIDUAL RETIREMENT ACCOUNTS (IRA)

◉ Inherited IRAs

- Documenting selection of Required Minimum Distribution (RMD) method
- Appropriate RMD Calculations

◉ Fair Market Value Reporting to IRS

FIRMA MEMBERS QUESTIONS

- ◉ Marijuana and Related Businesses
- ◉ Part 370 - Recordkeeping for the Timely Deposit Insurance Determination
- ◉ FIL-19-2019 Technology Service Contracts

QUESTIONS

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