

1. Determine the scope of the examination, based on the evaluation of internal controls and the work performed by internal or external auditors.
2. Review the board of directors minutes to ensure that real estate loan policies are reviewed and approved at least annually.
3. Test real estate loans for compliance with policies, practices, and procedures by performing the remaining examination procedures in this section. Obtain a listing of any deficiencies noted in the latest internal or external audit report, and determine if appropriate corrections have been made. Additionally, obtain a list of personnel changes. Determine if these changes are significant enough to influence the scope of the examination.
4. Obtain a trial balance and delinquency listing for all real estate loans.
 - a. Reconcile the real estate department's trial balance totals to the bank's general ledger accounts.
 - b. Review reconciling items for reasonableness.
 - c. Obtain information (for example, paid-to-dates, last date paid, and date of nonaccrual status) on past-due loans and loans on nonaccrual status.
5. Evaluate the bank with respect to—
 - a. the adequacy of written policies and procedures relating to real estate loans;
 - b. the operating compliance with established bank policy;
 - c. favorable or adverse trends in the overall real estate lending activity;
 - d. the accuracy and completeness of the bank's records;
 - e. the adequacy of internal controls;
 - f. adherence to lending policies, procedures, and authority by all appropriate personnel;
 - g. compliance with laws, regulations, and Federal Reserve policy on real estate lending activity, including lending limits and restrictions; loans to officers, directors, and shareholders; appraisal and evaluation of real estate collateral; and lending practices;
 - h. compliance with the Interagency Guidelines for Real Estate Lending Policies, including whether the bank is adequately documenting exceptions to supervisory loan-to-value (LTV) limits, whether the volume of nonconforming loans exceeds the capital limitations, and whether risk-management programs have been established and maintained to identify, measure, monitor, and control the inherent risks associated with high-LTV lending;
 - i. compliance with the Interagency Credit-Risk Management Guidance for Home Equity Lending; and
 - j. other matters of significance, including mortgage servicing, warehousing operations, and the loan-origination/resale process.
6. Select loans for examination, using an appropriate sampling technique drawn from judgmental (cutoff-amount approach) or statistical sampling. Analyze the performance of the loans selected for review by transcribing the appropriate information from the following list onto the real estate loan line cards, when applicable:
 - a. collateral records and credit files
 - b. loan agreements relative to any purchases, transfers, participations, or sales that have been entered into since the last examination
 - c. loan commitments and other contingent liabilities
 - d. loan-modification agreements or restructuring terms to identify a reduction in interest rate or principal payments, deferral of interest or principal payments, or other restructurings of terms
 - e. past-due/nonaccrual-related information
 - f. loan-specific internal information from problem credit analyses
 - g. escrow-analysis reports, including the status of property tax payments and escrow advances by the bank to cover delinquent property taxes
 - h. the status of mortgage insurance claims either for government insurance or guarantee programs or for private mortgage insurance, including procedures for ensuring coverage and reporting procedures for filing claims and contested claims, if any

Fdic Commercial Bank Examination Manual

D. R. Carmichael, Lynford Graham



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and procyclical regulatory pressure to reduce portfolio concentrations particularly in real estate lending This would be inconsistent with theories that secured lenders will choose economically optimal outcomes within a bankruptcy case as they may choose outcomes that are sub optimal within a bankruptcy to maximize an exogenous urgent need for capital

Federal Register ,2013-04 **Modernizing the Financial System** United States. Department of the Treasury,1991

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