

# In Touch

ISSUE 6 2020

Official Publication of the Community Bankers Association of Kansas

# Merry Xmas Bright

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**6 8 WAYS TO ENHANCE SECURITY FOR  
YOUR REMOTE WORKFORCE**

**10 INTERNET BANKING AND CYBER  
INSURANCE OPTIONS**

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# CONTENTS

Issue 6 | [www.cbak.com](http://www.cbak.com)

4

## FLOURISH

By Rebeca Romero, ICBA

6

## 8 WAYS TO ENHANCE SECURITY FOR YOUR REMOTE WORKFORCE

By Steven Ward, CSI

9

## THANK YOU

10

## INTERNET BANKING AND CYBER INSURANCE OPTIONS

By Diana Poquette, UNICO Group, Inc.

12

## THE 2021 COMMUNITY BANKERS COMPLIANCE PROGRAM

14

## SBA NOW PROCESSING PPP FORGIVENESS DECISIONS, REMITTING PAYMENTS

By Mary Ellen Biery, Abrigo

16

## DROP IN IRA BALANCES MAY MEAN RISE IN ROTH IRA CONVERSIONS

By Alayna Drope, CIP, CHSP, Ascensus

18

## SHELDEN ARCHITECTURE LET'S TAKE A WALK

By Stan Shelden, Principal of Shelden Architecture

## IN EVERY ISSUE:

8

## ANNIVERSARIES AND NEW ASSOCIATE MEMBERS

20

## PRODUCTS AND SERVICES REFERENCE LIST

22

## UPCOMING WEBINARS

# FLOURISH

BY REBECA ROMERO

**"Just as we responded to the PPP loan curveball, so, too, have we been there to address the additional hurdles our customers face."**

**W**hen we flip our wall calendars to October, we're regaled by images of pumpkins, ghosts and black cats. Halloween — the ultimate holiday of imagination — draws out the creative side in all of us.

But this year, as we suit up for Oct. 31, 2020, we do so under the blanket of COVID-19. The weight of that experience shifts the dynamic. In fact, given what we've dealt with this year, we all should be donning our favorite superhero uniforms. The lengths to which community bankers have gone in support of their customers is nothing short of heroic.

Superpowers aside, the future remains uncertain. With so many unknowns in the wake of the pandemic, forecasting what will happen tomorrow or next week — let alone next month or in a year — feels nearly impossible.

Yet, that's precisely what we're doing for our customers. Just as we responded to the Paycheck Protection Program (PPP) loan curveball, so, too, have we been there to address the additional hurdles our customers face, from loan accommodations to financial literacy knowledge and beyond. It is a disorienting time, to say the least, but community bankers are excelling for our customers because we continuously ask: How can we use the current circumstances to become more resilient and strengthen our business model?

Community bankers do not stand idly by and contemplate what's next. Instead, we act in support of immediate needs. Through thoughtful innovation, we persevere in addressing our customers' top issues. Yet, as we innovate, we are also required to evaluate how new processes, procedures and solutions

fit into the regulatory framework. In an environment where compliance accounts for upwards of \$4.9 billion of community bank expenses, what more can we expect from new programs like PPP?

These concerns have been bubbling up of late because the regulatory environment will dictate or limit what our future models may look like. So, as you dive into this month's issue, I urge you to do so with an eye toward areas of opportunity. As an assembly of community bankers at ICBA, where can we address the places where regulation and compliance may hinder our natural business growth? What actions do we need to take to ensure we have room to evolve to meet future customer needs?

While we can't predict the future, we can speak to one truth with absolute certainty: Community banking will not just survive but will thrive and flourish in the years to come. Because, despite the odds, in superhero sagas, the good guy always wins.

## **What you need to know**

Virtual education is a turnkey way to support your staff's ongoing professional development. Virtual Community Banker University courses provide education and training around timely topics, including emerging regulatory issues. ★



Connect with  
Rebeca @romerorainey



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# 8 WAYS TO ENHANCE SECURITY FOR YOUR REMOTE WORKFORCE

BY STEVEN WARD, CSI



**A**s a result of the COVID-19 pandemic, there has been a marked shift in how we work and use technology to stay connected and execute business. Many institutions are managing remote workforces while navigating the pandemic's ongoing effects, leading to a variety of challenges, including addressing cybersecurity threats.

## Understanding the Risks

There is a variety of cybersecurity risks for financial institutions to combat, including:

- **Phishing:** As many employees transitioned to remote work in early 2020, phishing scams skyrocketed, with attackers targeting personal email accounts in an attempt to compromise home networks.
- **Malware:** Cyber attackers are leveraging malware to obtain usernames, passwords and payment card information stored in a user's browser. According to security vendor Carbon Black, attacks targeting the financial sector have increased by 238% from February to April 2020.
- **IT Falling Behind:** A recent Aite report noted that IT departments are often short-handed and are now responding to remote work environments' challenges, leading to increased maintenance backlogs and slow response times.
- **Business Email Compromise (BEC):** The FBI issued a warning in early 2020 regarding a spike in BEC scams, which involve a

criminal sending an email and imitating the owner's identity, such as a company executive or recognized vendor.

## How to Enhance Security for Your Remote Workforce

To defend against the ever-present threat of cyberattacks, consider the following tips to secure your institution's workforce.

### 1. Provide Secure Internet Access

While providing employees with virtual private network (VPN) access will help mitigate cyber threats, there are risks associated with employees using their home networks for business when not connected to VPN. Security solutions that protect your network and users but do not interfere with business activities are priorities. Encourage employees to address the following questions to reduce the penetrability of home networks:

- What is the quality of your home network?
- Does your home network still have the default password?
- How old is the router?
- What protocols is it running?
- Do your personal devices have up-to-date malware and virus protection, the latest security patches and updated third-party software installed?



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Create and communicate a clear acceptable use policy and outline your specific policies for business devices. Your institution's acceptable use policy should also explicitly address work-from-home environments to educate employees on expectations and risks of remote work.

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**2. Create an Acceptable Use Policy**

In this new hybrid reality, employees may be more likely to use corporate-owned devices for personal business. Create and communicate a clear acceptable use policy and outline your specific policies for business devices. Your institution's acceptable use policy should also explicitly address work-from-home environments to educate employees on expectations and risks of remote work.

**3. Use Mobile Device Management**

If your institution issues business-owned devices to employees or if employees use personal devices for business, consider implementing mobile device management and encryption to safeguard all devices with access to your institution's data. This technology will also allow your IT support staff to fix issues remotely or install updates.

**4. Implement Web Content Filtering**

Web content filtering can extend beyond a VPN connection, offering additional layers of security. By providing web content filtering capabilities, your institution can protect off-network devices while preventing employees from accessing malicious or inappropriate sites and mitigating threats like malware.

**5. Enable Multifactor Authentication (MFA)**

Multifactor authentication is one of the best ways to protect your workforce from the two largest threat vectors: social engineering and phishing. Through MFA, multiple credentials are required to verify a user's identity. According to Microsoft, MFA can help prevent over 99% of account compromise attacks since a fraudster cannot gain account access solely by obtaining or cracking a password.

**6. Strategically Invest in Technology**

The number of available technology solutions designed to support your institution can be overwhelming but remember that you should not invest in technology that does not align with a business objective or support revenue generation. As you consider technology options, think holistically about your institution's IT strategy, goals and environment.

**7. Develop Well-Documented Processes**

Revisit key processes and determine how to integrate them in the new reality of remote work. Decide if current technology accommodates existing processes or requires updates to enhance security. Auditing processes for efficiency will also benefit your institution as you determine whether processes are scalable, have the appropriate number of steps and if they will meet your needs in the future.

**8. Promote a Security-Minded Culture**

As employees work remotely, your institution should prioritize employee cybersecurity education to create and maintain a security-minded culture. By creating a culture focused on security, you can educate employees on proper online conduct and reinforce the importance of asking for assistance after engaging in potentially risky behavior.

**Future of Remote Workforces**

The way we work has been transformed as a result of COVID-19. As the financial services industry's landscape continues adapting, your institution should prioritize security to serve your customers better. ✨

*Check out our remote workforce security infographic to learn more about how CSI can help you manage your remote workforce.*



*Steven Ward has over 29 years' experience in technology with 14 years in community banking technology, and currently serves as CSI's vCIO manager.*

# NEW ASSOCIATE MEMBERS



## **Hinkle Law Firm LLC**

Founded in 1987, Hinkle Law Firm LLC has developed a regional and national presence serving a diverse client base with advice and legal counsel.

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# ANNIVERSARIES

## **November**

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Towanda

## **December**

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Phillipsburg

134 Years  
Conway Bank  
Conway Springs

131 Years  
Kansas State Bank  
Overbrook

111 Years  
Farmers State Bank  
Phillipsburg

107 Years  
Johnson State Bank  
Johnson

59 Years  
Security State Bank  
Scott City

86 Years  
First State Bank & Trust  
Tonganoxie



# Thank You

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One of the real joys of the holiday season is the opportunity to say "thank you" and to wish you the very best for the new year. This year, amidst the many challenges we have all experienced, we think it's appropriate to extend our wishes for a happy, healthy, peaceful and prosperous holiday season and our hope that these sentiments extend into and beyond the upcoming year. As an organization that serves our state's community banks, we couldn't be more grateful and proud.

Shawn, Nikki & Yvonna





# Internet Banking and Cyber Insurance Options

BY DIANA POQUETTE, UNICO GROUP, INC.



**A**re your financial institution's computer systems impenetrable? Even if you have the most state-of-the-art security controls, your customer and corporate assets could be at risk.

Property policies work well when addressing physical damage to computers and the resulting business income and consequential loss if it results in loss or damage to tangible property. The cyber and fraudulent transfer exposure is addressed in other policies.

Most financial institution bonds today include coverage for losses involving:

- Theft of electronic data or property by hackers.
- Damage or destruction to electronic data or computer programs resulting from hackers.
- Computer viruses and employee sabotage.
- Fraudulent funds transfers initiated by phone, fax, email or internet access.

## POLICY OPTIONS

F.I. bond policies outline your responsibilities on wire transfers, such as callbacks, written agreements, etc. Under the bond, carriers carve out coverage for account takeover. If your customer's computer is compromised, there may not be coverage. They can also purchase their own cyber policy designed for their business exposure.

Cyber risk policies are written to cover liability, mitigation expenses, and income loss if your customer's information is compromised. Every policy includes exclusions. Cyber policies do include a breach response firm to assist and guide you.

There are broad-form policies available today from major carriers specializing in insurance for banks. These policies take the coverage another step further to also cover losses from:

- Invasion of privacy includes information contained on phones and other devices.
- Libel, slander, defamation or other oral or written disparagement.
- Loss or damage to electronic data of a customer or passing on a virus.
- Denial, impairment or interruption of service.
- Cost of new hardware, software, and bricked equipment.
- Unauthorized access to a customer account.
- Vandalism — hackers and crackers.
- Social networking liability and e-risk extortion.
- Security breach expense, public relations expense, and forensics.

You might assume your bond or cyber policy covers all of the above. However, you may want to request that your insurance agent take a closer look. Together, you can determine what coverage you really need and what you are willing to pay for the additional options.

## INTERNET BANKING — RISK MANAGEMENT

Conducting business over the Internet, sending confidential information online, or even just hosting an informational website puts your financial institution at risk for fraudulent and criminal acts.

Insurance carriers specializing in depository institutions ask that you complete questionnaires as part of the underwriting process.



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## Together, you can determine what coverage you really need and what you are willing to pay for the additional options.

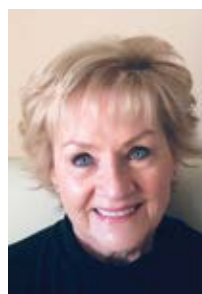
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These questions come from the insurance company's loss history and are intended to help the company, and you, determine where there may be exposure.


I.T. auditors and consultants also bring up various issues to help with risk management. You can ask your staff many questions to determine if there are any gaps in your loss control program. The following are just a few questions to include in a self-assessment tool. More procedures and controls are available upon request, along with examples of losses.

- Are employees working from home using bank-owned computers?
- If the website links by any means to any other website, has permission been granted or a link license been obtained?
- Does someone regularly review activity on social media?
- Are logical access controls (user IDs and passwords) in place to allow only authorized employees to access the network?
- Are the passwords changed every 120 days?

- Is the website's content reviewed to ensure mandatory legal disclosures and relevant regulatory and compliance issues have been adequately addressed?
- Has the internet banking strategic/business plan been reviewed and approved by the board of directors annually?
- Has the disaster recovery plan been modified to include internet banking and other electronic activities?
- Have the internal and external audit programs been updated to specifically address internet banking and electronic activities?
- Is software used to manage or monitor employee email content, file downloads, or unsolicited email (SPAM) activities?
- Has publicly obtainable information such as date of birth, social security number, mother's maiden name, etc. been removed from the list of authentication options?
- Are exception reports generated and reviewed daily, which would reveal: (1) restricted transactions, (2) correcting and reversing entries, and (3) unsuccessful attempts to access the system or restricted information? ★



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### Quarterly Regulatory Update Webinars

Each webinar will discuss current news and regulatory changes that may have an impact on community banks.



### Monthly Newsletter

The *Compliance Update* newsletter is sent to program members each month. It provides an update of compliance issues in easy to understand articles. Each issue includes a compliance calendar looking out several months at what is looming ahead that community banks need to be preparing for.



### Compliance Hotline

Members of the program may call the Young & Associates' toll-free number or visit their Web site with compliance questions that arise on a daily basis. Young & Associates has many qualified compliance professionals available to answer your questions. This service ensures that your bank is just a phone call or email away from the information you need in order to answer your compliance questions.



### CBC Members-Only Web Page

This web page is reserved for banks that are registered members of the CBC Program. In it, you will find timely information and tools provided by Young & Associates, Inc., that can be used to enhance the regulatory compliance function at your bank.



*"Most of us expect regulation measures to be tighter in the future, and we have to be ready. Using the CBC program helps our bank handle and control our compliance processes efficiently and more cost effectively."*

*Tim Matlack, President, FNB Washington, Washington, Kan.*



*"As a CBC Member, I use the 800-number Compliance Hotline and the team is professional while providing quick answers. This is a very practical and useful feature of the CBC program."*

*Margaret Nightengale, Senior Vice President, Grant County Bank, Ulysses, Kan.*

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# SBA Now Processing PPP Forgiveness Decisions, Remitting Payments

BY MARY ELLEN BIERY, ABRIGO



# Debt



**T**he Small Business Administration (SBA) is now processing some Paycheck Protection Program (PPP) loan forgiveness decisions and related payments.

During a call with SBA 7(a) lenders, SBA Deputy Associate Administrator Bill Briggs told attendees that PPP lenders would be getting a letter regarding the remittance of payment for PPP forgiveness applications that have been submitted. "SBA has begun the process of remitting payments, and we expect that to increase," he said.

A Treasury Department representative told several news outlets last week that the government expected to sign off on and begin paying some forgiveness requests by early this week. This week marks eight weeks after the SBA's PPP Forgiveness Platform opened on Aug. 10 to begin receiving applications processed by lenders. Under the PPP forgiveness timeline outlined in the CARES Act, the SBA has 90 days to review forgiveness application submissions and remit payment to the lenders for the forgiven portion.

In the meantime, House Speaker Nancy Pelosi and Treasury Secretary Steven Mnuchin have unsuccessfully tried to work out a deal that will garner support from the Republican-led Senate. Mnuchin has said he supports some streamlined forgiveness processes for \$150,000 or less for PPP loans.

"As it relates to the forgiveness part of this, I appreciate for many small businesses, the forgiveness process is a little bit complicated," Mnuchin said during an interview with Rep. Tom Reed (R-NY) that was posted on YouTube. "As part of additional legislation, we do support the bipartisan fix to simplify the process for loans that are \$150,000 or less but still gives the SBA the necessary ability to audit. Unfortunately, without legislation, there's only so much we can do."

Mnuchin said the SBA and Treasury are also working toward "an administrative solution" to make it easier for borrowers of \$50,000 or less to apply for forgiveness.

"We're trying to work on a solution for loans that are \$50,000 and less administratively that at least makes it slightly easier and



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**During a House Subcommittee hearing Oct. 1 on fraud tied to the PPP and the Economic Injury Disaster Loan (EIDL) program, government auditors and lawmakers expressed frustration, saying that while the programs have provided help to small businesses, too little has been done to mitigate fraud.**

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hopefully, we'll roll that out within the next week," he told Reed. Lawmakers and regulators have been working to answer borrowers and lenders' calls to streamline the forgiveness process. They are also facing pressure to mitigate the risk of losses to taxpayers from fraud.

During a House Subcommittee hearing Oct. 1 on fraud tied to the PPP and the Economic Injury Disaster Loan (EIDL) program, government auditors and lawmakers expressed frustration, saying that while the programs have provided help to small businesses, too little has been done to mitigate fraud.

Hannibal "Mike" Ware, Inspector General of the SBA Office of the Inspector General, noted that since May 5, when the first DOJ charges were brought, more than 57 defendants have been charged with PPP fraud, and hundreds of investigations are ongoing. "We're on this, and we're going to keep on this." He said that despite working with the SBA to mitigate risk, "There's no doubt a large part [of funding] has gone to ineligible recipients."

William Shear, Director of Financial Markets and Community Investment for the U.S. Government Accountability Office (GAO), agreed. "It'll be a long time before we know how much fraud there was in the program" of 5.2 million PPP loans and 3.5 million EIDL loans, he said. He said the OIG would like to work with the SBA even now to ensure it sets up a fraud risk framework to prevent further fraud as it proceeds with forgiveness and the rest of the program. "We very much recognize there was a push to get loans out," Shear testified. "But over time, it becomes more troubling when the fraud framework is not in place to mitigate the risk in place." Also, on the PPP front, the SBA has released new guidance on dealing with borrowers selling or trying to sell their businesses. Procedural Notice 5000-20057 issued Oct. 2, 2020, clarified that original owners/PPP borrowers remain responsible, regardless of any change of ownership, for:

- the performance of obligations under the PPP loan
- certifications tied to the PPP application
- compliance with all other PPP requirements
- obtaining, preparing, and retaining all required PPP forms and supporting documentation
- providing those forms and supporting documentation to the PPP lender or lender servicing the PPP loan or the SBA upon request.

In some cases, the PPP lender may unilaterally approve the change of ownership, but in others, prior SBA approval is required. In all cases, however, the procedural notice said the

PPP borrower "must notify the PPP lender in writing of the contemplated transaction and provide the PPP Lender with a copy of the proposed agreements or other documents that would effectuate the proposed transaction." In all cases, the PPP lender must also continue submitting monthly 1502 reports until the PPP loan is fully satisfied.

The notice defined a change of ownership for PPP borrowers as one of the following:

- the sale or other transfer of at least 20% of common stock or other ownership interest of a PPP borrower (including a publicly traded entity), including the sale or transfer to an affiliate or an existing owner of the entity — whether in one or more transactions
- the PPP borrower sells or otherwise transfers at least 50% of its assets (based on fair market value) — whether in one or more transactions
- a PPP borrower is merged into or with another entity.

For more information about the PPP, see Abrigo's CARES Act and PPP Resource Page. ✨



*Mary Ellen Biery, senior writer and content specialist, at Abrigo. Abrigo is a leading technology provider of compliance, credit risk, lending, and asset/liability management solutions that community financial institutions use to manage risk and drive growth. Visit [abrigo.com/intouch](https://abrigo.com/intouch) to learn more.*



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# Drop in IRA Balances May Mean Rise in Roth IRA Conversions

BY ALAYNA DROPE, CIP, CHSP, ASCENSUS

With the global economy experiencing an extraordinary decline over the past few months because of the coronavirus (COVID-19) pandemic, IRA owners may find their retirement savings balances are much lower than they ever anticipated. As many contemplate financial moves to improve their prospects for a financially secure retirement, there may be a positive side to the drop in account balances: it might just be an excellent time to convert to a Roth IRA.

Tax-free distributions' potential makes the Roth IRA a popular retirement savings vehicle, and conversions are one way to fund a Roth IRA. There are no eligibility restrictions, so for your IRA clients whose income is too high to make regular Roth IRA contributions, they can get money into a Roth IRA by converting non-Roth IRA savings to a Roth IRA. Specific rules apply, however, so it is important that you — and your clients — understand how a conversion works. What's more, the transaction is final, so your IRA owner clients may want to seek competent tax advice before converting.

## Conversion

A conversion is the taxable, reportable movement of assets from a Traditional IRA, including Traditional IRAs that contain simplified employee pension (SEP) plan contributions, to a Roth IRA. Assets in a savings incentive match plan for employees of small employers (SIMPLE) IRA also may be converted to a Roth IRA, but only after a two-year period. This period begins on the date that the first SIMPLE IRA plan contribution was deposited to the SIMPLE IRA owner's account.

Note that required minimum distribution (RMD) amounts may not be converted. Only after the RMD is distributed for a year may the balance of a Traditional or SIMPLE IRA be converted to a Roth IRA, if eligible.

In response to the economic downturn caused by the COVID-19 pandemic, the IRS waived 2020 RMDs. As a result, IRA owners who are converting to a Roth IRA in 2020 do not have to satisfy their RMDs first.

## Taxation

The amount converted is subject to income tax, but the 10 percent penalty tax for early (before age 59½) IRA distributions does not apply. Your IRA owners must include all previously

untaxed assets (pretax assets) that are converted in their taxable income for the year of the conversion. For purposes of determining what should be included in their taxable income, all Traditional and SIMPLE IRAs assets are aggregated. Pretax assets generally include all

- deductible Traditional IRA contributions,
- retirement plan pretax assets rolled over to a Traditional IRA,
- SEP and SIMPLE IRA contributions, and
- earnings.

Any nondeductible, or after-tax, Traditional IRA contributions and retirement plan rollovers of after-tax assets are considered "basis" in a Traditional IRA. Any basis in the Traditional IRA is not taxable when converted.

An IRA owner cannot convert basis alone, however. Assets that are converted to a Roth IRA consist of pro rata portions of both pretax assets and basis, if both types of assets exist in the IRA owner's IRAs. To determine the amount of the converted assets that can be excluded from income, the aggregate basis amount is divided by the aggregate IRA balance and then multiplied by the converted amount. Your organization is not required to calculate this; it is the IRA owner's responsibility. But you may want to remind your IRA owners that they must complete IRS Form 8606, *Nondeductible IRAs*, to formally calculate and report the taxable amount of the conversion. Form 8606 must be attached to their federal income tax returns for the year of the conversion, regardless of whether there is any basis to their credit. Your IRA owners may want to seek assistance from a competent tax advisor.

Because conversion assets are subject to tax, your organization must apply the federal income tax withholding rules, allowing your IRA owners to request 10% or more be withheld or to elect to waive withholding.

## Process

IRA owners may convert their IRA assets either directly or indirectly. Doing so directly means that the IRA owner does not take receipt of the assets. Instead, the distribution from the Traditional or SIMPLE IRA is payable to the receiving financial organization for the benefit of the IRA owner, or an internal transfer of the assets is made. If the IRA owner elects withholding on a direct conversion, the amount withheld and submitted to the IRS is reported as a distribution to the IRA owner and is not



considered part of the conversion. Thus, it is subject to the 10% early distribution penalty tax if the IRA owner is under age 59½.

When an IRA owner requests and receives a Traditional or SIMPLE IRA distribution (the check is made payable to the IRA owner) and she deposits the amount in a Roth IRA within 60 days after the date of receipt, the conversion was done indirectly.

Because of the disruptions caused by the COVID-19 pandemic, the IRS issued Notice 2020-23 to extend the deadlines certain time-sensitive tax-related actions. An indirect conversion that needed to be redeposited between April 1 and July 15, 2020, to satisfy the 60-day window was permitted to be delayed until July 15, 2020.

Another option, if within the same financial organization, is to “redesignate” the Traditional or SIMPLE IRA as a Roth IRA. The IRA owner must complete a new IRA application that identifies specifically what type of IRA is in existence (i.e., Roth IRA). Redesignating a non-Roth IRA as a Roth IRA does not require the investment instrument to be closed or surrendered. All banking, insurance, state, and federal laws still must be taken into account when considering the redesignation approach.

## Reporting

All IRA distributions being converted are reported on Form 1099-R, *Distributions from Pensions, Annuities, Retirement or Profit-Sharing Plans, IRAs, Insurance Contracts, etc.* For a direct conversion, either code 2, Early distribution, exception applies (for IRA owners under age 59½), or code 7, Normal distribution, must be shown in Box 7.

If an IRA owner under age 59½ withholds on a distribution that is directly converted, the distribution must be reported on two Forms 1099-R. One Form 1099-R reports the direct conversion amount using distribution reason code 2, and the second Form 1099-R reports amounts withheld for taxes using code 1, *Early distribution*, no known exception (for IRA owners under age 59½). Because amounts withheld are not converted, they are considered distributions to the IRA owner and — as previously noted — are subject to the 10% early distribution penalty tax, unless a penalty tax exception applies.

For an indirect conversion, either code 1 or code 7 is used in Box 7. Financial organizations that receive a direct or indirect conversion report the amount on Form 5498, *IRA Contribution Information*, in Box 3, *Roth IRA conversion amount*.

Although physically accomplished through an internal transfer, redesignations must be reported as distributions on Form 1099-R and conversion contributions on Form 5498.

## Documentation

Ensure that your organization has captured the required information — eligibility, client elections, etc. — by

using transaction forms. Understanding the conversion requirements and having the written documentation to support each transaction will help your organization handle conversions with confidence and efficiency. ✨



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# SHELDEN ARCHITECTURE

## LET'S TAKE A WALK

BY STAN SHELDEN, PRINCIPAL OF SHELDEN ARCHITECTURE

Sometimes it starts as a simple vision. It could be an idea or a sketch on a napkin. Or sometimes, it begins as a casual conversation. I am the owner of Shelden Architecture and in my experience, starting up a conversation is a great way to brainstorm and gather ideas for a project before anything is ever put on paper. I prefer to do it while taking a walk.

By that, I mean walking down the project path and exploring for a while. What do you see for the future of your banking business? That initial research phase is a fun and exciting time. It's a "shoot-for-the-moon" kind of stage and absolutely nothing is off-limits. We love to take time to walk and dream alongside our clients.

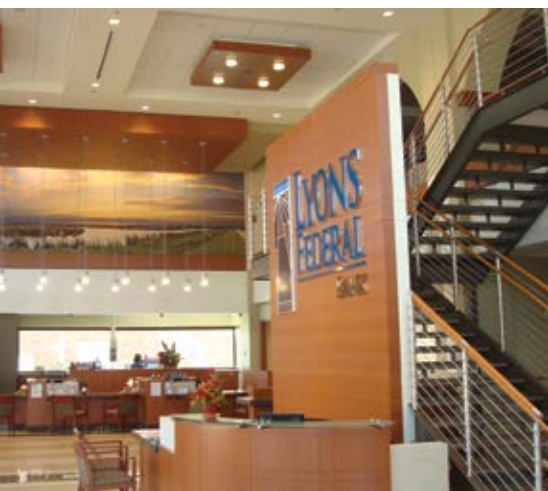
First, we start by asking questions about our client's business plan. A banking facility should be more than a building. It should reflect who the company is, what they stand for, and where they

see their financial institution going into the future. How do they want their bank represented? What are they trying to tell the world about their company?

It's important to uncover these ideas to be on the same path as our client and their ultimate vision. Some banks have a very clear picture of the kind of structure and environment they seek to create. Some want to feel very cutting-edge or super sleek — like an Apple Store, but for banking. Other institutions prefer to create a friendly, hometown or coffee-shop vibe. Still others take the traditional route.

In this raw conception phase, we recommend visiting different facilities and spaces with our clients. Sometimes that means taking a trip to Kansas City, Denver or Chicago. And sometimes that means taking an actual walk down the street. We'll look at the buildings we've created. We'll go to structures designed by other firms. There's something truly invaluable to experiencing





a building firsthand beyond blueprints on a computer screen. A client can uncover what they don't like, what they might need, and what they really love by visiting real-life spaces. These are steps we happily take with our clients. We want to reassure them that we are genuinely in this process together.

The next step is to walk through options and uncover possible hurdles. Every project has some obstacle to overcome, whether it's budget, time or some other limitation. With a new build, zoning and codes can take up time at the start of the project. At Shelden Architecture, we don't see limitations as a negative. We actually view a limitation as an exciting challenge!

From our experience designing and renovating banks over the years, we've learned that financial institutions generally seek a long-term structural solution. Some architectural firms like to go along with trends, but we like to look at the long game as we partner with clients. Can this new facility be flexible? Can it evolve as our client's business plan grows?

As our walk progresses, our clients' relationship as compassionate advocates for their growing business is strengthened. Collaboration is at the heart of what we do here. That enables our team of designers and architects to empathetically lead each project. Part of that means making sure our clients understand every aspect of the process. It is vitally

important to have a transparent relationship. We want our clients to feel welcome to express their thoughts, ideas and concerns throughout the project. There are a lot of decisions being made, so clear communication is essential. After all, this is their building. This is their environment and should reflect their vibe. This is their dream.

Through well-thought-out function, beauty, and meaningful form, each project becomes an incredible reality. A banking environment should be designed in such a way that it elicits a positive and inspired reaction in your customers, employees, and everyone that steps foot into it. When you envision your dream banking project, we would like to do it with you. We love what we do and cannot imagine doing anything else. Let's take a walk together. ✨



*Stan Shelden is the owner and principal of Shelden Architecture. With over 30 years of experience, he and his team have designed dozens of financial institutions. Some of his clients include Equity Bank, Fidelity Bank, Intrust Bank, MB Foundation, Corner Bank (now RCB), Lyons Federal Bank, Kanza Bank, Halstead Bank and many others.*

# Products and Services Reference List

Each asterisk (\*) represents an agreement for a specific endorsed product with that company. Not all products that these companies offer are endorsed by CBA. To see a detailed list and explanation of endorsements, visit CBA online at [www.cbak.com](http://www.cbak.com).

Keep in mind that the services provided by each company on this list may only be a sampling of the many services they offer. By their CBA Associate Membership, these companies have shown their commitment to serving community banks. Please look to these companies first, whenever possible, to meet your banking needs.

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**Data Center Inc. (DCI)**  
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**Hilltop Securities**  
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Kent, OH.....800-525-9775

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**Bank Consulting Partners**  
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**Kansas Bankers Technologies**  
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Oklahoma City, OK.....405-782-8420

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### Verge Network Solutions, Inc.

Oklahoma City, OK.....405-782-8420

## TELECOMMUNICATIONS SYSTEMS

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Oklahoma City, OK.....405-782-8420

## TITLE INSURANCE ABSTRACTING

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## WEBSITE DEVELOPMENT

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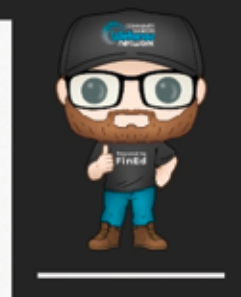
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Dec 1 2020	Avoiding BSA Compliance Violations
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Dec 9 2020	Legal Issues Surrounding Subpoenas & Summonses
Dec 10 2020	Top IRA SECURE Act & COVID Rule Changes for 2020 Tax Year
Dec 11 2020	Top 10 Year-End Lending Issues & FAQs
Dec 15 2020	Avoiding Loan Denial Mistakes
Dec 16 2020	Year-End BSA Issues: FAQ Guidance, Enforcement Actions & Red Flags
Dec 17 2020	How to Review Legal Documents: POAs, Trusts, Guardianships, Estates & More
Jan 6 2021	Providing Provisional Credit Under Reg E
Jan 7 2021	Uniform Residential Loan Application (URLA): Deadline March 1, 2021.
Jan 12 2021	Remote Workforce Series: Creating or Revising Work from Home Policies
Jan 13 2021	2020 HMDA Submission Due March 1, 2021: Challenges & Best Practices
Jan 14 2021	IRA & HSA Update: Key Considerations for 2021
Jan 20 2021	Flood Series: Flood Insurance Rules, Best Practices & Liability
Jan 21 2021	Call Report Update 2021
Jan 26 2021	Remote Workforce Series: Work from Home Record Retention Rules
Jan 27 2021	Calculating Cash Flow from Corporate Tax Returns
Jan 28 2021	Beginning BSA Officer: What You Need to Know on Day 1
Feb 2 2021	Red Flags in Residential Appraisal Compliance
Feb 3 2021	Flood Series: Flood Compliance Beyond the Basics
Feb 4 2021	Calculating Cash Flow from S-Corporation & Partnership Tax Returns
Feb 9 2021	Remote Workforce Series: Work from Home Risks: How Compliance Can Limit Liability



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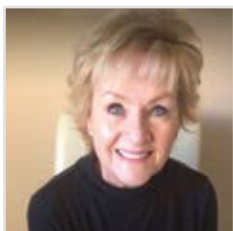
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## Diana Poquette

Account Executive

402.499.1011

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