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# Your Guide to **Section 19**



Federal Deposit Insurance Corporation

### **Section 19 Helpful Links**

Prospective applicants and interested parties should read this brochure, the FDIC's Rules of Practice and Procedure Part 303, Subpart L (12 C.F.R. part 303, subpt. L) entitled "Section 19 of the FDI Act (Consent to Service of Persons Convicted of, or Who Have Program Entries for, Certain Criminal Offenses)," and the Section 19 application form and instructions. These documents are located on the FDIC website at [www.fdic.gov](http://www.fdic.gov) and at the following web address: [www.fdic.gov/regulations/applications/resources/section19.html](http://www.fdic.gov/regulations/applications/resources/section19.html).

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### Covered Offense

A criminal offense involving dishonesty, breach of trust, or money laundering. Some examples include, but are not limited to, theft, misappropriation, embezzlement, forgery, false identification, false report to law enforcement, tax evasion, drug possession with intent to distribute, and writing of a bad check.

### Covered Individual

A person who has a criminal record that includes a conviction or Program Entry for a covered offense.

### De Minimis Offense

A covered offense considered minor for which the FDIC's approval is automatically granted, and no application is required. Criteria are defined in the *De Minimis Offenses Do Not Require an Application* section.

### Pretrial Diversion or Similar Program (Program Entry)

These programs go by several different names, but they generally remove the defendant from the ordinary channels of prosecution so that the defendant may complete program conditions. Once the defendant meets the conditions, either the prosecutor or the court will dismiss, reverse, or reduce the charges. If, after successful completion of a Program Entry, the initial charge for a covered offense is reduced to a charge for an offense that is not a covered offense, or is dismissed, the offense **will require** an application unless the initially charged offense is *de minimis*. Section 19 treats Program Entries the same as convictions.

### Expungement

The result of a legal process by which a record of conviction or Program Entry is removed, sealed, or erased from an individual's criminal record. If an order of expungement or an order to seal has been issued in regard to a conviction or Program Entry, or if a record has been otherwise expunged by operation of law, then the conviction or Program Entry is not an offense of record and does not require an application.

### Fidelity Bond

A form of insurance protection that covers policyholders for losses that they incur as a result of fraudulent acts by specified individuals. It usually insures a company for losses caused by the dishonest acts of its employees.

### What is Section 19?

Section 19 of the Federal Deposit Insurance (FDI) Act (12 U.S.C. 1829), enacted by the U.S. Congress in 1950, generally prohibits individuals convicted of certain crimes from becoming employed by, or participating in the affairs of, an FDIC-insured depository institution (IDI). This lifetime prohibition applies to any person convicted of, or who has entered into a Program Entry for, a criminal offense involving dishonesty, breach of trust, or money laundering. However, under certain circumstances, the law permits the FDIC to grant written consent to allow a covered individual to be employed by or participate in the affairs of an IDI.

Individuals with covered convictions often are not aware that they are subject to the prohibitions of Section 19 until they have applied for employment at an IDI. The FDIC has published this brochure to promote transparency and awareness of the law, educate those impacted by the law, and explain the requirements of and the process for filing a Section 19 application. Prospective applicants and interested parties should read this brochure; the FDIC's Rules of Practice and Procedure Part 303, Subpart L, which establishes the FDIC's standards for Section 19; and the FDIC's Section 19 application form and instructions. These documents are located on the FDIC website at [www.fdic.gov](http://www.fdic.gov) and at the following web address: [www.fdic.gov/regulations/applications/resources/section19.html](http://www.fdic.gov/regulations/applications/resources/section19.html).

### Does Section 19 Apply to You?

Section 19 applies to any **individual convicted** or who has entered into a pretrial diversion or similar program (Program Entry) for a **crime involving dishonesty, breach of trust, or money laundering**, which would prohibit the individual from participating in the affairs of an IDI **without the written consent from the FDIC**. An application must be filed with the FDIC to obtain written consent, and there are two ways to file. An application can be filed (1) by an individual (Individual Waiver), or (2) by an IDI that wants to hire a covered individual and sponsors the application (Sponsorship).

### FDIC Rules of Practice and Procedure Part 303, Subpart L

On September 21, 2020, the FDIC amended its Rules of Practice and Procedure Part 303, Subpart L: "Section 19 of the FDI Act (Consent to Service of Persons Convicted of, or Who Have Program Entries for, Certain Criminal Offenses)" (Subpart L). Subpart L sets forth the FDIC's standards for implementing Section 19. It also defines key terms, establishes when an application is required, specifies which the factors FDIC will evaluate when considering an application, and describes the *de minimis* rules for covered offenses that do not require an application.

Subpart L replaced the FDIC's previous Statement of Policy on Section 19 and was issued to provide greater transparency and certainty as to the FDIC's interpretation and processes regarding Section 19. It is intended to aid both IDIs and individuals who may be affected by Section 19 to understand its impact and potentially seek relief from its provisions. The rules contained in Subpart L have expanded the scope of crimes that qualify as *de minimis*, and have excluded all crimes that have been expunged or sealed from barring an individual under Section 19. These rules, including the *de minimis* criteria, are described on the following pages.

### **De Minimis Offenses Do Not Require an Application**

Under certain circumstances, generally involving relatively minor covered offenses, a person with a *de minimis* covered offense is not required to submit an application, and the FDIC's consent is automatically granted.

Subpart L establishes criteria where a covered offense may qualify as *de minimis*. Individuals with a minimal number of covered offenses that meet the *de minimis* requirements are generally considered to pose a low risk to the Deposit Insurance Fund and are unlikely to impair the public confidence in the banking system. The rules lay out the *de minimis* criteria in several categories:

- General criteria regarding the number of offenses, the waiting period after a covered offense, and the individual's age at the time of the underlying misconduct, and
- Specific criteria for offenses involving small-dollar, simple theft; use of a fake identification by individuals under the age of 21; and the writing of insufficient funds checks ("bad" checks).

Appendix A of this brochure provides tables that explain the criteria for these categories of *de minimis* offenses. The tables are provided as a useful guide to help understand the rules established in Subpart L. The full content of Subpart L governs if questions arise as to a determination whether an individual qualifies for the *de minimis* exception to filing an application.

As noted above, in situations where the covered individual's crime(s) meet the *de minimis* criteria in any of the categories, the individual's covered offense(s) will not require an application, and the FDIC's consent is automatically granted. Where there is a single covered offense that meets the prescribed criteria of any *de minimis* category, the crime is immediately considered *de minimis* and no application is required. Where there are two covered offenses that meet the prescribed *de minimis* criteria of any

category, a “waiting period” must pass before the crimes will qualify as *de minimis*. The extent of the waiting period depends on the age of the covered individual on the date that the crime was committed that resulted in the ultimate conviction or Program Entry.

If the covered individual was age 21 or younger on the date(s) that the underlying misconduct for both offenses occurred, then the waiting period is 18 months following the date of the most recent conviction or Program Entry. If the covered individual was age 22 or older on the date that either of the two offenses occurred, then the waiting period is three years following the most recent date of conviction or Program Entry. The waiting period begins on the date of conviction or the date when a Program Entry begins. For example, if an individual has two covered offenses where both offenses were committed prior to the individual’s 22nd birthday, then the waiting period is 18 months from the date of the most recent conviction or the start of the Program Entry. The 18-month waiting period applies even if the date of the conviction or the individual’s Program Entry occurred on or after their 22nd birthday. If either of two offenses were committed on or after the individual’s 22nd birthday, then the waiting period is three years following the most recent date of conviction or Program Entry start.

Any individual with three or more covered offenses will not qualify for the *de minimis* exception and is required to submit an application.

#### **Pardons, Expungements, and Conviction Appeals and Reversals**

A criminal offense is covered by Section 19 only if the individual has either a conviction or Program Entry for a covered offense. A pardoned conviction or Program Entry remains subject to Section 19 and always requires an application, unless the covered offense is otherwise *de minimis*. A conviction or Program Entry that has been expunged or sealed is not subject to Section 19 and will not require an application. Section 19 does not cover a conviction or Program Entry that has been reversed on appeal, unless the reversal was for the purpose of re-sentencing.

#### **Applying for Consent**

There are two types of applications that can be filed with the FDIC to seek written consent for a covered individual to participate in the affairs of an IDI. There is the Sponsorship application and the Individual Waiver application.

The Sponsorship application involves an IDI filing a Section 19 application on behalf of a prospective director, officer, employee, or other individual seeking to obtain control or otherwise participate in the IDI’s affairs. In this case, the IDI is the applicant, sponsors the covered individual, and

requests the FDIC's consent to the covered individual's participation or employment exclusively at the sponsoring IDI. The other application is the Individual Waiver application, which requires the covered individual to file a Section 19 application on his or her behalf without being sponsored by an IDI. Sponsorship and Individual Waiver applicants are required to complete **Form 6710/07**. Before an application is filed, prospective applicants are encouraged to take these steps:

1. Contact the appropriate FDIC Regional or Area Office. The table following this list indicates the appropriate office based on an applicant's home address (for an Individual Waiver) or the location of the sponsoring IDI's home office (for a Sponsorship).
2. Provide the FDIC point-of-contact with a description of the offense the applicant believes requires an application. With assistance from the FDIC point-of-contact, determine whether (i) the individual's criminal offense is covered by Section 19 and, if so, if an application is required, or (ii) the offense qualifies as *de minimis*.
3. Confirm that all conditions of sentencing arising from the covered offense have been satisfactorily completed. Note, however, that an individual is *not* required to have completed all sentencing requirements in order to qualify for the *de minimis* exception pertaining to convictions or Program Entries for "bad" or insufficient funds checks, and the creation, possession, or use of a fake, false, or altered identification to circumvent age-based restrictions. Aside from these limited exceptions, the FDIC will not process an application if the conditions of sentencing are not complete.
4. Complete the application form, attach supplemental documentation, and submit the application package to the appropriate FDIC office.
5. Ensure the FDIC has your contact information while the application is being processed.



### FDIC Regional or Area Office Contact Information

<b>Individual Waiver – Applicant’s Home Address Located in: Sponsorship – IDI’s Home Office Located in:</b>	<b>FDIC Regional or Area Office</b>	<b>Telephone Number</b>
Alabama, Florida, Georgia, North Carolina, South Carolina, Virginia, West Virginia	Atlanta Regional Office	800.765.3342
Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont, Puerto Rico, U.S. Virgin Islands	Boston Area Office	866.728.9953
Illinois, Indiana, Kentucky, Michigan, Ohio, Wisconsin	Chicago Regional Office	800.944.5343
Colorado, New Mexico, Oklahoma, Texas	Dallas Regional Office	800.568.9161
Iowa, Kansas, Minnesota, Missouri, Nebraska, North Dakota, South Dakota	Kansas City Regional Office	800.209.7459
Arkansas, Louisiana, Mississippi, Tennessee	Memphis Area Office	800.210.6354
Delaware, District of Columbia, Maryland, New Jersey, New York, Pennsylvania	New York Regional Office	800.334.9593
Alaska, Arizona, California, Hawaii, Idaho, Montana, Nevada, Oregon, Utah, Washington, Wyoming, American Samoa, Guam, Federated States of Micronesia, Northern Mariana Islands	San Francisco Regional Office	800.756.3558

#### Section 19 Application Process

In considering an application, the FDIC must assess whether the covered individual has demonstrated his or her fitness to participate in the conduct of the affairs of an IDI. The FDIC considers whether participation by the covered individual may constitute a threat to the public confidence in, or the safety and soundness of, an IDI or the interests of depositors. Because the bar to meet this standard is high, the FDIC requires the applicant to provide certain information. The FDIC considers several factors when assessing a Section 19 application. These factors are:

- The conviction or Program Entry and the specific nature and circumstances of the covered offense;
- Evidence of rehabilitation, including the person’s age at the time of conviction or Program Entry, the time that has elapsed since the conviction or Program Entry, and the person’s employment history and full legal history;

- The position to be held or the level of participation by the covered individual;
- The amount of influence the covered individual will exercise over the operation, management, or affairs of the IDI;
- The ability of the IDI's management to supervise and control the person's activities;
- The degree of ownership or control the person will have of the IDI;
- The IDI's fidelity bond coverage of the person;
- The opinion or position of the primary federal or state regulator; and
- Any additional factors in the specific case that appear relevant.

Appendix B of this brochure provides a helpful checklist that may assist you in preparing your application.

### **Sponsorship Applications**

The above factors are important considerations in determining the risk to IDIs. However, Sponsorship applications differ from Individual Waiver applications in several areas. In a Sponsorship application, an IDI seeks the FDIC's consent for the covered individual to participate only in a specific role at the sponsoring IDI. The sponsoring IDI is aware of the covered individual's conviction and rehabilitation history and is willing to sponsor that individual. The IDI, in applying on behalf of a covered individual, has agreed to supervise the covered individual for a specific duty or job range and must ensure the person is covered by the IDI's fidelity bond to the same extent as others in similar positions. When the FDIC grants or denies a Sponsorship application, the sponsoring IDI is notified by letter. The FDIC's decision is specific to the role requested by the sponsoring IDI and is not transferable to another IDI.

### **Individual Waiver Applications**

An Individual Waiver applicant may apply on his or her own behalf. When evaluating Individual Waiver applications, the FDIC must consider that, upon issuance of an order granting approval of a waiver, the covered individual will not be barred by Section 19 from holding any position or participating to any extent in the ownership, affairs, or influence over management of any IDI. The FDIC is unable to assess the degree of supervision and controls that may prospectively exist over the covered individual's activities at any IDI. Accordingly, approval is granted only in cases where the applicant has demonstrated a

record of rehabilitation sufficient to mitigate the seriousness of the offense. The record of rehabilitation must be detailed, commensurate with the seriousness of the offense, and demonstrate the individual is fit to participate in the affairs of an IDI in any capacity. Information on how to document an adequate record of rehabilitation is included in the *Evidence of Rehabilitation* section.

When the FDIC grants or denies an Individual Waiver application, it issues a formal order with the decision that is publicly available on the FDIC's website in a searchable database that discloses the covered offense(s). If the FDIC determines an application should be denied, the applicant will be given the opportunity to withdraw the application, in which case a formal order of denial will not be publicly issued. Approved Individual Waiver orders are generally subject to conditions. The conditions typically require the covered individual to provide a copy of the FDIC's order to all IDIs in the affairs of which he or she intends to participate, and that the individual be covered by the IDI's fidelity insurance to the same extent as those who hold similar positions.

#### **Subsequent Covered Offenses**

In Sponsorship and Individual Waiver applications, approval applies only to the covered offense(s) included in the application. If a covered individual is convicted or enters into a pretrial diversion or similar program for a subsequent covered offense, the covered individual will become subject to the prohibition of Section 19 immediately and must reapply to the FDIC via the Sponsorship or Individual Waiver process, unless the *de minimis* criteria apply. A person who has a subsequent covered offense under Section 19 cannot continue to be an employee or participate in the affairs of an IDI until the FDIC approves a new application.

#### **Details of the Crime, Conviction or Program Entry, and Sentencing**

In addition to basic biographical and identifying information, the applicant must provide a description of the covered offense, the nature and circumstances surrounding it, the date of the offense and subsequent conviction or Program Entry, and the name and address of the court involved. Applicants are encouraged to include a detailed narrative that describes the situation that led to the commission of the crime and any relevant information that may help the FDIC to understand the circumstances and motivations involved at the time the offense occurred.

Applicants should disclose the specific charge that was entered into the record of conviction or Program Entry. It is not uncommon for a

person to initially be charged with a crime and ultimately be convicted of or stipulate to a distinctly different, but related, crime (e.g., in a plea agreement, an individual may stipulate to a lesser crime than initially charged). Applicants should submit court documentation that indicates the disposition of the criminal proceeding, the conditions imposed at sentencing or a Program Entry, and any documentation showing that sentencing requirements, such as fines, probationary terms, or community service, have been satisfactorily completed. Court documents may include the indictment or complaint and final decree of judgment, documentation to support the successful completion of conditions of a Program Entry, and any pertinent facts or documentation relative to the crime, which are not disclosed in the court documents.

### **Evidence of Rehabilitation**

The covered individual's rehabilitation is a critical factor in assessing his or her fitness to participate in the conduct of the affairs of an IDI. Evidence taken into consideration includes the individual's age at the time of the covered offense, the amount of time that has elapsed since the occurrence of the covered offense, and the person's full legal history, including non-Section 19 covered offenses and arrests.

Evaluation of an individual's record of rehabilitation that adequately offsets the seriousness of the crime depends on the nature and facts underlying the offense and the evidence of rehabilitation presented. The absence of any subsequent convictions or Program Entries of any nature, in and of itself, does not prove rehabilitation. Applicants are encouraged to provide documentation or other evidence that supports their rehabilitation. Examples may include the covered individual's resume or details of employment history since the occurrence of the covered offense (fiduciary roles should be highlighted), educational achievements subsequent to the covered offense, and record of community service or volunteer work subsequent to the covered offense.

Although not required, Individual Waiver applicants are encouraged to submit letters of recommendation. A recommendation letter wherein the author states that he or she has knowledge of the individual's covered offense is more likely to be given substantial weight. Letters from a current or former employer or supervisor, persons influential in a community or a community service organization, an assigned parole officer, or a college or school official (if attendance is current or recent), for example, are generally more persuasive than letters from friends or family members.

**Investigation and Application Processing**

The application process involves a thorough investigation and verification of the information provided. The investigation includes comprehensive checks into the covered individual's background, experience, and rehabilitation. The FDIC will research and follow-up on inconsistencies in the application materials. An omission or failure to provide sufficient information may result in processing delays or return of the application. Intentional inaccuracies or omissions, misrepresentation, or falsification may be grounds for denial of an application, and might have other legal consequences. Additionally, covered individuals are required to complete an FBI fingerprint identification check. Once an application has been submitted, the Regional or Area Office point-of-contact will provide the applicant with instructions and a unique authorization to complete the electronic fingerprinting process at a local site.

FDIC Regional or Area Offices are the primary points-of-contact for all applicants, and those offices process Sponsorship and Individual Waiver applications. The Regional and Area Offices are authorized to act on Sponsorship applications. The FDIC strives to act on Sponsorship applications within 30 days after receipt of a substantially complete application. However, the FDIC's acknowledgement of receipt of an application does not indicate the application is substantially complete and has been accepted for processing. An application is deemed substantially complete only when the FDIC has received all necessary documentation to support the application, including the results of the fingerprint check and all relevant law enforcement background investigations. The FDIC Regional or Area Office will notify the applicant of the date the application is considered substantially complete and accepted for processing.

Individual Waiver applications require an additional level of review at the FDIC's Washington, DC Office and, for this reason, require more time to process. The FDIC strives to act on Individual Waivers within 45 days after receiving the Regional or Area Office recommendation.

The FDIC recognizes that individuals subject to Section 19 face certain challenges and is committed to providing a transparent process and assistance to applicants.

## Appendix A

### General *De Minimis* Category

(See next page for crimes involving small-dollar, simple theft; “bad” checks; and fake identification)

#### One Covered Offense

##### **No Waiting Period Applies and No Application Required**

- ✓ One conviction or Program Entry of record based on a covered offense; **and**
- ✓ Maximum punishment<sup>1</sup> that could have been imposed for the crime at the time was imprisonment for a term of one year or less or a fine of \$2,500 or less, and the individual served three (3) days or less of jail time; <sup>2</sup> **and**
- ✓ All of the sentencing requirements associated with the conviction, or conditions imposed by the Program Entry, have been completed (except for offenses involving “bad” checks or fake identification as described on the following page); **and**
- ✓ The offense was not committed against an IDI or insured credit union.

#### Two Covered Offenses

##### **No Application Required Following Waiting Period**

##### **Age When Crimes Were Committed – 22 and Older**

- ✓ Both convictions meet the criteria listed above for One Covered Offense or for the Additional *De Minimis* Categories on the following page; **and**
- ✓ The actions that resulted in either of the convictions or Program Entries occurred when the individual was age 22 or older; **then**
- ✓ Three (3) years must pass since the date of the most recent conviction or Program Entry.

##### **Age When Crimes Were Committed – 21 and Younger**

- ✓ Both convictions meet the criteria listed above for One Covered Offense or for the Additional *De Minimis* Categories on the following page; **and**
- ✓ The actions that resulted in both convictions or Program Entries occurred when the individual was age 21 or younger; **then**
- ✓ 18 months must pass since the date of the most recent conviction or Program Entry.<sup>3</sup>

<sup>1</sup> The maximum punishment provision set forth in Subpart L refers to the maximum sentence and fine allowed by the jurisdiction’s law at the time of the offense and not the actual sentence imposed by the court against the individual.

<sup>2</sup> The term “jail time” is defined in Subpart L and includes confinement to a facility of incarceration, even when allowed to leave for a work-release or similar arrangement; and a psychiatric treatment center in lieu of jail, prison or house of correction on mental-competency grounds. It does not include time spent on probation or parole, in a substance-abuse treatment program facility, or outpatient psychiatric treatment.

<sup>3</sup> The action(s) or event(s) that led to the convictions or Program Entries must have occurred while the individual was age 21 or younger; however, the passage of 18 months must occur following the date that the conviction was rendered or the Program Entry began.

## Appendix A (continued)

### Additional *De Minimis* Categories - Specific Crimes

#### Small - Dollar, Simple Theft

##### No Waiting Period Applies and No Application Required

- ✓ One conviction or Program Entry involving theft (but excluding burglary, forgery, robbery, identity theft, and fraud) where the aggregate value of the currency, goods, or services taken was \$1,000 or less; **and**
- ✓ The theft was not committed against an IDI or insured credit union; **and**
- ✓ All of the sentencing requirements associated with the conviction, or conditions imposed by the Program Entry, have been completed.

##### No Application Required Following Waiting Period

- ✓ Individuals with two covered offenses that meet the criteria of any *de minimis* category (including small-dollar, simple theft; fake identification; or “bad” checks) are subject to the applicable waiting period based on the individual’s age at the time of the offense as listed under the General *De Minimis* Category.

#### Fake I.D.

##### No Waiting Period Applies and No Application Required

- ✓ One conviction or Program Entry involving the creation, possession, or use of a fake, false, or altered form of identification by a person under the age of 21 to circumvent age-based restrictions on purchases, activities, or premises entry.

##### No Application Required Following Waiting Period

- ✓ Individuals with two covered offenses that meet the criteria of any *de minimis* category (including small-dollar, simple theft; fake identification; or “bad” checks) are subject to the applicable waiting period based on the individual’s age at the time of the offense as listed under the General *De Minimis* Category.

#### “Bad” Checks

##### No Waiting Period Applies and No Application Required

- ✓ An unlimited number of convictions or Program Entries involving the writing of a “bad” check (i.e., an insufficient funds check), where the aggregate face value of all “bad” checks cited within all convictions or Program Entries is \$1,000 or less; **and**
- ✓ None of the payees on any of the checks was an IDI or insured credit union.

##### No Application Required Following Waiting Period

- ✓ All “bad” checks convictions that meet the above conditions qualify as one covered offense for purposes of the *de minimis* criteria.
- ✓ Individuals with one additional covered offense that meets the criteria of any *de minimis* category (including small-dollar, simple theft or fake identification) are subject to the applicable waiting period based on the individual’s age at the time of the offense as listed previously in the General *De Minimis* Category regarding two covered offenses.

**Notes:** Maximum punishment (sentencing and fines) and jail time provisions do not apply to the small-dollar, simple theft; fake identification; or “bad” checks categories.

Sentencing or Program Entry requirements are not required to be completed for “bad” checks or fake identification offenses that meet the respective *de minimis* criteria.

## Appendix B

### Application Checklist

- Obtain Form 6710/07, *Application Pursuant to Section 19 of the Federal Deposit Insurance Act*, from the FDIC's website at: [www.fdic.gov/regulations/applications/resources/section19.html](http://www.fdic.gov/regulations/applications/resources/section19.html).
- Contact the appropriate FDIC Regional or Area Office to inform the office of your belief that an application must be filed.
- Prepare a detailed description of the offense(s) and the nature and circumstances surrounding the offense(s).
- Obtain copies of the indictment/charges, judgment/deferred adjudication, or documentation showing the terms of a Program Entry. Obtain any other court records that set forth the nature of the offense(s) for which the individual was charged.
- Obtain documentation showing that the sentence or terms of the Program Entry have been completed.
- If the application is filed by an individual, ensure the comments in Section G, *Individual Waiver Statement*, include any relevant information explaining why the filing is being made by an individual rather than through an IDI, and provide an explanation why there is substantial good cause for the FDIC to grant a waiver of the requirement that an IDI file on the individual's behalf.
- Also in Section G, provide a detailed description of the position being sought, including the job title and duties of the position. If not seeking a specific position, explain the reason the application is being filed. Provide an explanation why employment or other participation at an IDI would not pose a risk to an IDI.
- Provide information reflecting the individual's rehabilitation. Examples of items that may be submitted in support of rehabilitation include: resume and satisfactory employment records; letters of reference from former employers, school officials, influential members of the community, or probation/parole officers; charitable, community service, or other civic activities; academic achievements; etc. Evidence of rehabilitation should cover the period subsequent to the covered offense(s).
- Disclose current employment status and job title.
- Ensure contact information (phone, address, and email) is current, and notify the FDIC of any changes in contact information while the application is being processed.
- Submit a signed copy (original or digital signature) of the application form, attachments if additional space is required to provide complete responses, and relevant documentation that supports the application.
- Follow instructions provided by the FDIC for completing the fingerprinting process.
- Respond promptly if contacted by the FDIC, and provide any additional information upon request that the reviewer needs to process the application.



Federal Deposit Insurance Corporation  
**Division of Risk Management Supervision**  
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