Communication Review Decision Tree Example

Communication	Accuracy/UDAAP* Review?	Technical Compliance Review?
Social media rapid-response	Yes	No, as long as all of the following statements are true: - Response to regulatory complaint? Escalate as necessary; - Meets response parameters outlined in Social Media rapid-response program
Use of logo-only on banners, flags, merchandise, baked good etc.	Yes	No, as long as all of the following statements are true: - The material makes no mention (even generally) of any product, service or term offered by the Bank; - The material makes no mention of Investments or non-insured product and/or service; and - The material contains Member FDIC** as applicable. If *any* of the above statements are not true, Technical Compliance Review required.
Content/materials/edits that are general brand, company or community-oriented information	Yes	No, as long as all of the following statements are true: - The material makes no mention (even generally) of any product, service or term offered by the Bank; - The material makes no mention of Investments or non-insured product and/or service; and - The material contains Member FDIC**. If *any* of the above statements are not true, Technical Compliance Review required.
References to a general category of services without any type of specific product, service or term reference (i.e., "Commercial Banking" or "Private Banking")	Yes	No, as long as all of the following statements are true: - The material makes no mention of any specific product, service or term offered by the Bank; - The material makes no mention of Investments or non-insured product and/or service; and - The material contains Member FDIC logo**, Umpqua Bank NMLS#*** and/or Equal Housing Opportunity logo****, as applicable. If *any* of the above statements are not true, Technical Compliance Review required.
Materials/content/edits that reference product information and details or offers related to a product or service	Yes	Yes
Large, multifaceted projects	Yes	Individual elements may need technical review based on above criteria. Consultation on big picture recommended at project onset.

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* Accuracy/ UDAAP	*EVERYTHING* has been considered from a UDAAP perspective, and all statements are factual, accurate and supported, not misleading.
**Types of Advertisements that *do not* require use of Member FDIC (Part 328.3(d))	Types: - Supplies such as stationary (except when used for circular letters), envelopes, deposit slips, checks, drafts, signature cards, deposit passbooks, certificates of deposit, etc. - Signs or plates in the institution's offices or attached to the building in which such offices are located; - Listings in directories; - Advertisements not setting forth the name of the Bank; - Entries in a depository institution directory, provided the name of the Bank is listed on any page of the directory with a symbol or other descriptive matter indicating it is a member of the FDIC; - Joint or group advertisement of bank services where the names of insured institutions and noninsured institutions are listed and form a part of such advertisements; - Advertisements by radio or television, other than display advertisements, which do not exceed 30 seconds in time; and - Advertisements which are of the type that make it impractical to include Member FDIC, including, but not limited to promotional items such as matchbooks, calendars, pens, pencils, keychains
***Required Use of NMLS ID	If loan is secured by a residence, advertisement should include the Bank and/or MLO Unique Identifier/NMLS #.
****Required Use of Equal Housing Opportunity logo, statement or slogan	If a printed advertisement of a loan for the purpose of purchasing, constructing, improving, repairing, or maintaining a dwelling or any loan secured by a dwelling is used, determine whether the Equal Housing Lender logo or symbol is appropriately used.
Use of SBA logo	In advertisements, the Bank may make a factual statement concerning its status with SBA without the use of any SBA logo.
Retention	Record of all material must be retained/accessible for monitoring