

## **GUIDANCE DOCUMENT**

This guidance document is advisory in nature but is binding on an agency until amended by such agency. A guidance document does not include internal procedural documents that only affect the internal operations of the agency and does not impose additional requirements or penalties on regulated parties or include confidential information or rules and regulations made in accordance with the Administrative Procedure Act. If you believe that this guidance document imposes additional requirements or penalties on regulated parties, you may request a review of the document.

## STATEMENT OF POLICY #20

### COLLATERAL INSPECTIONS: USE OF AUTONOMOUS OR SEMI-AUTONOMOUS TECHNOLOGY

The Nebraska Department of Banking and Finance (“Department”) sets forth Statement of Policy #20 regarding the use of autonomous or semi-autonomous technology employed to conduct inspections of collateral taken to secure loans made by financial institutions chartered by the Department pursuant to the Nebraska Banking Act, Neb. Rev. Stat. §§ 8-101.02 to 8-1,143 (“Act”).

The Act, Department Administrative Rules and Regulations contained within Title 45 of the Nebraska Administrative Code, and the Department have established requirements regarding inspections, appraisals, and other evaluations of physical collateral. As emerging technologies begin to supplement or supplant traditional inspection or appraisal methods, banks must ensure that, regardless of the technologies utilized, all inspections and appraisals are being conducted reasonably, appropriately, and in a safe and sound manner.

The Department expects all banks that utilize autonomous or semi-autonomous technology, such as drones or self-driving vehicles, to conduct such inspections to take steps to appropriately consider items such as liability, compliance with federal, state, and local laws, and any applicable privacy protections that may subject the bank to the risk of civil action or loss. This expectation is applicable to all such inspections regardless of whether conducted by bank employees, agents, and contractors, through a third-party vendor, or any combination thereof. Banks may address such considerations by the creation and implementation of policies and procedures, adequate insurance coverages, or through other liability or indemnity agreements.

The Department has developed a sample checklist that captures the information necessary to demonstrate to Department examiners that inspections aided by autonomous and semi-autonomous technology are being done in a reasonable manner. While this sample form is included as an indexed document to this Statement of Policy, it is not required to be used, and other forms containing substantially similar information or items of review shall also be permissible.

This form is in addition to the inspection and appraisal reports required by 45 NAC 14.

Attachment: *Sample Checklist*

Original Issue Date: July 1, 2025

Ag Inspection Checklist						
Farm/Farmer/Producer Name:				Inspection Date:		
Owner/Operator Address:		Notes:				
Phone Number:						
Purpose of Inspection:		Livestock	Crops	Land	Other (describe)	Notes:
<i>Complete a separate form for each asset group (i.e. livestock, crops, land, etc.)</i>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Comment on physical descriptions of land, equipment, etc. here:						

[illegible][illegible]

Crop Inspection							
Variety and Crop	Grade	Acres	Location	# of Units	Price/Unit	Value	Comments
Operating Schedule		Seasonal <input type="checkbox"/>	Year Round <input type="checkbox"/>	Further Description (if known):			
Water Source:		Surface <input type="checkbox"/>	Ground <input type="checkbox"/>	Municipal <input type="checkbox"/>	Other (describe) <input type="checkbox"/>	Notes:	
Notes:							

Physical Location Inspection		
Geographic Location:	Latitude:	Longitude:
Property Type:		
Land Area (acres):	Notes:	

<b>Authorization for Inspection</b>	
Authorized by (Owner/Operator): _____	Inspector: _____