

## InfoSight Highlight

### InfoSight – Security

Part 748 of the NCUA Rules and Regulations requires that each federally-insured credit union develop a comprehensive written security program (including administrative, technical, and physical safeguards appropriate to their size, complexity, and the nature and scope of their operations). Does your credit union utilize Social Media? Do you do wire transfers? Would you know what to do if one of your elderly members has been the victim of elder abuse or fraud? In the Security channel of InfoSight, you will find a variety of topics on these and many others, including cybersecurity, cloud computing, internal controls, identity theft and more.

Be sure you are kept up-to-date with the information in the [Security channel](#) today!

## Compliance News

### Bureau finalizes TRID rule amendment

Last week, the CFPB (which is now referring to itself as "The Bureau of Consumer Protection") finalized the July 2017 proposed amendments to the TILA-RESPA rule in attempt to get rid of what has become known to compliance folks as the "black hole" problem. TILA-RESPA Rule requires creditors to provide consumers with good faith estimates of the loan terms and closing costs required to be disclosed on a Loan Estimate. Under the rule, an estimated closing cost is disclosed in good faith if the charge paid by or imposed on the consumer does not exceed the amount originally disclosed, subject to certain exceptions.

If the conditions for using such revised estimates are met, the creditor generally may provide revised estimates on a revised Loan Estimate or, in certain circumstances, on a Closing Disclosure. However, under the current rule, circumstances may arise in which a cost increases but the creditor is unable to use an otherwise permissible revised estimate on either a Loan Estimate or a Closing Disclosure for purposes of determining good faith. This situation, known as the TRID "black hole," often occurs when the lender has already provided the borrower with the Closing Disclosure when it learns of the fee increase. Currently, a creditor may only use a Closing Disclosure to reset tolerances if there are fewer than four business days between the time the creditor is required to provide the Closing Disclosure reflecting the revised estimate (i.e., within three business days of receiving information sufficient to establish a reason for revision) and consummation. This is referred to as the "four-business day limit." As a

## InfoSight Compliance eNEWSLETTER May 4, 2018 Vol. 12, Issue 18

Created in partnership with the



Credit Union National  
Association

## Compliance Videos

### Compliance Outlook for Q1 and Q2 2018

In this video, Glory LeDu provides the [overview of what's ahead in the compliance world for 2018](#). This covers annual threshold updates, HMDA changes, Payday Alternative Loans, Military Lending Act, ACH Same-day ACH processing and more!

Just a reminder that Compliance videos since 2016 can be found on YouTube at [the Compliance Connection channel](#), where they are generally updated quarterly.

## Compliance Calendar

May, 2018

- May 11th, 2018: [Customer Due Diligence – CDD \(FinCEN\) – Effective date](#)

result, credit unions are often forced to absorb increased costs that would otherwise be rightfully passed on to the member but for this four-day limit.

To address this situation, in July 2017, the Bureau proposed to address the issue by specifically providing that creditors may use Closing Disclosures to reflect changes in costs for purposes of determining if an estimated closing cost was disclosed in good faith, regardless of when the Closing Disclosure is provided. Last week, the Bureau finalized this proposed amendment, thus once it becomes effective 30 days after publication in the Federal Register, there will no longer be a four-day limit for resetting tolerances with revised closing disclosures. Therefore, if a changed circumstance or another triggering event has occurred, the 2018 TILA-RESPA Rule permits a creditor to reset tolerances with either an initial or corrected Closing Disclosure regardless of the number of days between consummation and the date the Closing Disclosure reflecting the revised estimate is required to be provided to the consumer. However, keep in mind that the four-day limit will remain in effect for revised Loan Estimates, just not revised Closing Disclosures.

*Source: CUNA Compliance Blog*

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### **FinCEN Advisory on Jurisdictions with AML/CFT Deficiencies**

Recently, FinCEN issued Advisory FIN-2018-A002 on FATF-identified jurisdictions with anti-money laundering and combatting the financing of terrorism (AML/CFT) deficiencies. FATF issued its updated list on February 23, 2018.

[Click here for the updated information.](#)

*Source: FinCEN*

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### **U.S. Court Case: 9 Banks and 50 Bank Accounts Exploited by Human Trafficking Ring**

We have heard a lot recently about how financial institutions can help in the war against human trafficking. How does it work, and what are the ways banks and credit unions can be exploited by those who intend to engage in these practices? [A blog from 2017](#) provides an excellent look at the process used and what red flags financial institutions need to watch for.

- May 28th, 2018: Memorial Day - Federal Holiday

July, 2018

- July 1st, 2018: [Regulation CC Amendments – Availability of Funds and Collection of Checks](#)
- July 4th, 2018: Independence Day - Federal Holiday
- July 29th, 2018: [5300 Call Report Due to NCUA](#)

September, 2018

- September 3rd, 2018: Labor Day - Federal Holiday

October, 2018

- October 8th, 2018: Columbus Day - Federal Holiday
- October 28th, 2018: [5300 Call Report Due to NCUA](#)

November, 2018

- November 12th, 2018: Veterans Day (observed) - Federal Holiday
- November 22nd, 2018: Thanksgiving Day - Federal Holiday

Source: Verafin

### Advocacy Highlight

#### Comments Due Throughout the Month of May

One of the best ways to get involved with advocacy issues that have a direct effect on your credit union is to stay on top of the current trends and write comment letters stating your credit union's stance. For a current listing of Bureau of Consumer Financial Protection (CFPB) proposals as well as suggested changes to NCUA bylaws, [click on this link from CUNA](#).

Source: CUNA

#### Keeping up with CUNA Advocacy

To stay abreast of the issues on which CUNA has provided input to lawmakers and regulators, [here is a list of those topics](#).

#### CUNA Advocacy Update

The CUNA Advocacy Update is published at the beginning of every week and keeps you on top of the most important changes in Washington for credit unions--and what CUNA is doing to monitor, analyze, and influence government agencies and federal law. To receive this update, click on "Get CUNA Updates" on the [CUNA Advocacy page](#). Additional Advocacy efforts may also be found under [CUNA's Removing Barriers blog](#). With the recent updates to CUNA's website, Advocacy information has also changed. To view recent advocacy issues and see ways your credit union can become involved, visit the [Priorities](#) or [Actions](#) pages.

#### New ComplySight Complaint System Enhancements!

The Complaint Management System dashboard, which has been under construction, is now live and ready to be viewed! The dashboard view will depend on the user's access level. Log in today to see this new view!

We received immediate feedback when we launched the Complaint Management System that a user access level between CMA and CMU would be helpful. That access level is now here! The CM1 access level is an intermediate level of access which allows the user to create, assign, and

### Compliance Training

#### Regulatory Compliance Training

#### CUNA and CUNA Webinars

[CUNA has published a list of their free webinars for 2018!](#)

CUNA offers hundreds of online training events that make it easy for you to learn right at your desk. Whether you are looking for a beginner course or want a comprehensive understanding on a specific topic, CUNA webinars, audio conferences and eSchools have what you need. [Click here for updates on compliance, operations, lending topics and more!](#)

#### CFPB'S Amendments to the Mortgage Servicing Rules Webinar (Recorded)

Credit unions that service mortgage loans saw an increase in their servicing responsibilities in October 2017 and will see additional requirements take effect in April 2018. [Click here to register for this recorded webinar.](#)

manage Complaints as well as manage Member/Non-Members. CM1 users will see all Complaints they have created or been assigned.

CM1 users cannot close or delete Complaints, and cannot manage sub-categories or branch locations. Because a CM1 cannot close a Complaint, once they have completed the review for a Complaint it must be sent to a CMA for a final review and to be closed. The Complaint System User's Guide has full instructions on the CM1 access level rights.

We hope this new access level will make managing your Complaints easier than ever and as always, we welcome your feedback and suggestions.

### **ComplySight:30-Day Free Trial!**

If you're interested in a "trial run" of ComplySight, League InfoSight is offering a free, 30-day trial so you can see the benefits first-hand. It's easy to get started. [Just visit us online and click on Free Trial Offer.](#)

