

## InfoSight Highlight

### Happy Holidays!!

This is our last issue until January 11, 2019! May everyone have a safe and merry holiday season – see you next year!

### InfoSight News: [Annual threshold updates](#)

At the end of every year, we have dollar amount changes for several thresholds in the BCFP rules, the Federal Reserve Board rules and even IRS rules. These changes will be reflected in InfoSight after the first of the year.

## Compliance News

### [NCUA to launch alternating exam pilot program](#)

On January 1, 2019, the NCUA and six state credit union regulators will launch an [alternating examination pilot program](#) for a select group of federally insured, state-chartered credit unions. The NCUA has posted an [FAQ about the program](#).

NCUSIF operating level lowered

The NCUA Board held an open meeting at the agency's headquarters on December 13, 2018, and [unanimously approved three items](#):

- Lowering the normal operating level of the National Credit Union Share Insurance Fund to 1.38 percent from 1.39 percent.
- Posting the final report of the agency's Regulatory Reform Task Force in the Federal Register, following a briefing by the Office of the General Counsel.
- A final rule making technical amendments to agency regulations to correct minor drafting errors and rescind certain unnecessary provisions.

Source: NCUA

### [NCUA to Return to 3-year Reg. Review](#)

NCUA will return to its former practice of conducting rolling three-year reviews and will post updates to its website every six months, following one recommendation from the task force. [Here is more information and related links](#).

Source: CUNA Removing Barriers Blog

### [UBS Financial Services to pay \\$15M for AML failings](#)

[The Financial Crimes Enforcement Network \(FinCEN\) announced Monday](#) that it has assessed a \$14.5 million civil money penalty on UBS Financial Services, Inc., of which \$5 million will be paid to the U.S. Treasury, and the balance will be concurrent with \$9.5 million of the \$10 million in penalties imposed for similar or related conduct by the Securities and Exchange Commission and the Financial Industry Regulatory Authority.

FinCEN said UBSFS failed to develop and implement an appropriate, risk-based anti-money laundering program that adequately addressed the risks associated with accounts that included both traditional brokerage and banking-like services. UBSFS failed to implement appropriate policies and procedures to ensure the detection and reporting of suspicious activity through all accounts—particularly for those accounts that exhibited little to no securities trading. The firm did not adequately structure its AML program to address the

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## Compliance Videos

### Compliance Videos:

#### [Compliance Connection Video](#)

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

December, 2018

- December 25th, 2018: Christmas Day - Federal Holiday

April, 2019

- April 1st, 2019: [Prepaid Accounts under the Electronic Fund Transfer Act/Regulation E and the Truth In Lending Act/Regulation Z \(Date Extended\)](#)

## Compliance Training

### CUNA Webinars

[CUNA has published a list of their free webinars for 2018 and into 2019!](#)

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

use of securities accounts for the purpose of moving funds rather than trading securities.

FinCEN also said that, over several years, UBSFS processed through certain of its brokerage accounts hundreds of transactions that exhibited red flags associated with shell company activity. UBSFS failed to adequately monitor foreign currency-denominated wire transfers—amounting to tens of billions of dollars—that were conducted through its commodities accounts and retail brokerage accounts. UBSFS's AML monitoring system failed to capture critical information about these foreign currency-denominated wires, including sender and recipient information and the country of origin and destination. As a result, it was unable to identify and investigate potentially suspicious transactions based on the presence of important risk factors, such as jurisdiction and the involvement of politically exposed persons.

Source: *FinCEN*

### Advocacy Highlight

#### Advocacy Message from CUNA

2018 was a remarkable year for credit union advocacy. In a turbulent political environment, credit unions, Leagues and CUNA led the way. Because of our efforts, regulatory barriers were removed; we advanced the credit union charter at the federal and state level; we held data compromisers accountable; we preserved the tax status; we expanded our grassroots capabilities and we returned a credit union majority to Congress. This is shared victory that we should be very proud of!

But advocacy is a process, not an event. Our work to revolutionize the operating environment for credit unions is not over. We will be right back here in 2019 working with you to advance credit union priorities in Congress, at the regulatory agencies, in courts and in state capitals in coordination with state credit union leagues!

Source: *CUNA*

#### Pending Regulatory Comment Calls

[CUNA plans to comment on the following pending regulatory proposals](#) for the rest of this year. For comment letters to have the greatest impact, consider whether and how these proposals would affect your credit union and contact the CUNA staff listed for each proposal with your feedback. Also, feel free to contact the CUNA staff listed if you would like more information on how to send your own letter.

*CUNA Advocacy*

#### 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.

conferences and eSchools have what you need. [Click here for updates on compliance, operations, lending topics and more!](#)

#### ADA Compliance Webinar

Are you 100% positive that your website is fully accessible to your members with disabilities? Approximately 1 in 5 users who access websites rely on assistive technology to use the full features of these sites. This includes aging populations, those with varying levels of vision and mobility, and cognitive disabilities.

Watch Timmy Bohlman, SVP of Technology Solutions at CU Solutions Group, and Tyler D'Amore, Director of Strategic Partnerships at AudioEye, in a pre-recorded webinar as they review:

- What true accessibility means for websites
- What a website audit covers
- Credit unions' future responsibilities

[Register now to view the ADA Website Compliance Webinar!](#)

Source: *CU Times*

