

InfoSight Highlight

Loan Channel – Home Mortgage Disclosure Act (HMDA)

The Home Mortgage Disclosure Act had some significant changes that were effective January 1, 2018 and this channel in ComplySight was updated to reflect those changes. Included among them were:

- The types of transactions needing to be reported;
- New data points to be captured and reported;
- Collection and reporting of certain applicant information;
- Method of data reporting; and
- Required disclosures

[Click here](#) to view the topic, and to ensure your credit union is in compliance.

Compliance News

Consumer Financial Protection Bureau Finalizes Changes to Prepaid Accounts Rule

The Consumer Financial Protection Bureau (Bureau) announced today that it has finalized updates to its 2016 prepaid rule. The Bureau's 2016 prepaid rule put in place requirements for treatment of funds on lost or stolen cards, error resolution and investigation, upfront fee disclosures, access to account information, and overdraft features if offered in conjunction with prepaid accounts. The changes announced today adjust requirements for resolving errors on unregistered accounts, provide greater flexibility for credit cards linked to digital wallets, and extend the effective date of the rule by one year to April 2019.

Prepaid accounts are among the fastest growing consumer financial products in the United States, usually purchased at retail outlets or online. Prepaid accounts may be loaded with funds by a consumer or by a third party, such as an employer. Consumers generally can use these accounts to make payments, store funds, withdraw cash at ATMs, receive direct deposits, or send money to others. According to industry analysts, the amount consumers put on "general purpose reloadable" prepaid cards grew from less than \$1 billion in 2003 to nearly \$65 billion in 2012. The total dollar value loaded onto these prepaid cards is expected to nearly double to \$116 billion by 2020.

Today's changes to the prepaid rule will:

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Credit Union National
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Compliance Videos

Compliance Outlook for Q4 2017

In this video, Glory LeDu provides a [brief summary of the key changes of the new HMDA rules](#) becoming effective in January. You won't want to miss this important overview!

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

February, 2018

- February 19th, 2018: President's Day - Federal Holiday

March, 2018

- March 16th, 2018: [Same-day ACH](#)

- **Adjust error resolution requirements:** In June 2017, the Bureau proposed amendments to require consumers to register their accounts to receive fraud and error protection benefits, such as the right to dispute charges and have stolen money restored, and to extend the protections retroactively to suspected thefts or disputes occurring before registration was successfully completed. Today's changes provide that the error resolution and liability limitation protections apply prospectively, after a consumer's identity has been verified. These changes will help encourage prompt registration and streamline compliance for financial institutions as well as ensure continued availability and utility of prepaid accounts for consumers.
- **Provide more flexibility concerning credit cards linked to digital wallets:** Digital wallets provide consumers with an electronic way to use their debit and credit cards. Some digital wallets are also prepaid accounts because consumers can use them to store and access funds directly. The rule changes ensure that consumers continue to receive full federal credit card protections on their traditional credit card accounts while making it easier for them to link those accounts to digital wallets that can store funds. The changes also reduce potentially unnecessary complications and expense to consumers who link credit cards to digital wallets.
- **Extend the overall effective date of the rule by one year:** The Bureau is sensitive to the concerns raised by commenters about needing more time to implement the rule, especially where they are making changes to packaging for prepaid cards sold in stores. The Bureau is thus extending the overall effective date of the rule by an additional year, to April 1, 2019.

The Bureau also finalized certain other clarifications and minor adjustments to aspects of the prepaid rule. [Click her for more information about today's changes and the Bureau's 2016 prepaid rule.](#)

[Click here to view today's final rule.](#)

Source: CFPB

Russian and Ukrainian individuals and entities designated

Treasury's Office of Foreign Assets Control has [announced](#) the designation of 21 individuals and 9 entities under four Executive Orders related to

[\(NACHA\) – Phase 3 of the implementation period for the rule.](#)

April, 2018

- April 1st, 2018: [Prepaid Accounts under the Electronic Fund Transfer Act/Regulation E and the Truth In Lending Act/Regulation Z \(Date Extended\)](#)
- April 29th, 2018: [5300 Call Report Due to NCUA](#)

May, 2018

- May 11th, 2018: [Customer Due Diligence – CDD \(FinCEN\) – Effective date](#)
- May 28th, 2018: Memorial Day - Federal Holiday

July, 2018

- 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

Russia and Ukraine, including three individuals and two entities related to Russia's transfer of four turbines made by a Russian-German joint venture to Crimea. OFAC also identified 12 subsidiaries that are owned 50 percent or more by previously sanctioned Russian companies to provide additional information to assist the private sector with sanctions compliance.

Source: OFAC

October, 2018

- October 8th, 2018:
Columbus Day -
Federal Holiday

Advocacy Highlight

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 TRAINING VIDEOS ARE NOW AVAILABLE

We are happy to announce that our training webinars have been updated! We have created a video series with shorter segments to help our users get the most out of ComplySight! These video tutorials are available 24/7!

We have created **seven** new video tutorials ranging in length from 5 to 23 minutes:

- ComplySight Overview and Set Up
- Set Up and Manage Users
- Assigning Compliance Reviews
- Factor Grading
- Automatic Action Items (AAI) and Manual Action Items (MAI)
- Examiner/Audit Findings
- Regulatory Alerts

To access the tutorials, log into ComplySight and click on the "Help" page, then choose "Video Tutorials." We are also in the process of revising our User Guide, so be sure to keep an eye out for those changes too. If you have any questions, please feel free to contact info@complysight.com.

Compliance Training

NCUA webinar on Credit Union Diversity

The NCUA presented a webinar on November 2, titled "What, Why and How: Credit Union Diversity." An [archived recording of the webinar](#) is available online. The webinar featured credit union board members and staff leaders from Municipal Credit Union, Brooklyn, New York, Self Help Credit Union, Durham, North Carolina, and North Side Community Federal Credit Union, Chicago, Illinois. The webinar also discussed how to use the NCUA's Voluntary Credit Union Diversity Self-Assessment tool. This 28-question checklist is designed to support credit unions' diversity efforts. All credit unions, but especially those with at least 100 employees, are encouraged to complete the checklist and submit it electronically to the NCUA's Office of Minority and Women Inclusion by Dec. 30.

CUNA and CUNA Webinars

CUNA offers hundreds of online training events that

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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.](#)