



Compliance eNewsletter

April 12, 2019 Vol. 13, Issue 14

InfoSight News

Recent Updates for Review

Did you know that InfoSight is adding new resources and content on a consistent basis in order to help your credit union with compliance?

Aside from the new content we have recently added (Payday Alternative Loans and Prepaid Cards), we have also added additional resources that you may find helpful. If you haven't already, please check out these goodies under "Additional Resources" of the associated topics in the *Loan Channel*.

- Home Mortgage Disclosure Act: "CFPB – Overview Reference Chart for Data Collected in 2019" and "2019 HMDA Reporting Guide"
- Ability to Repay and Home Ownership Equity Protection Act and Truth in Lending: "Rural and underserved areas tool"
- SAFE Act – Registration of Mortgage Loan Originators: "S.2155 Impact on MLO Registration – NMLS FAQs"

We continuously try to make sure that InfoSight is comprehensive and provides you with the information and resources you need to comply. Are we missing something you would like to see? [Let us know!](#)

Compliance News

CECL FAQs Released by Interagencies

The Board of Governors of the Federal Reserve System (FRB), the Federal Deposit Insurance Corporation (FDIC), the National Credit Union Administration (NCUA), and the Office of the Comptroller of the Currency (OCC) released an updated FAQ document on CECL (current expected credit losses) methodology. This document

contains already issued FAQs from 2016 and 2017, as well as those updated and newly added in this April 2019 release.

The April 2019 updates include adjustments to Questions #4, #18, #34, and #35. New FAQs to the document are #38- #46.

The notice makes clear that until CECL becomes effective, credit unions (and other institutions) must continue to follow current U.S. GAAP on impairment and the allowance for loan and lease losses (ALLL). Existing ALLL policy statements and guidance will not be rescinded until CECL is effective for all institutions. You may recall that there are different effective dates depending on an institution's characteristics. For credit unions (non-PBEs) the credit losses standard is effective for fiscal years beginning after December 15, 2021 including interim periods within those fiscal years. So, for a non-PBE with a calendar year fiscal year, the standard is effective January 1, 2022 with the application of CECL methodology applied in its financial statements and Call Reports for the quarter ended March 31, 2022.

[The FAQ document is available here.](#)

Source: FRB, FDIC, NCUA, OCC

HUD Charges Facebook With Housing Discrimination Over Company's Targeted Advertising Practices

The U.S. Department of Housing and Urban Development (HUD) announced today that it is charging Facebook with violating the Fair Housing Act by encouraging, enabling, and causing housing discrimination through the company's advertising platform. [Read HUD's Charge against Facebook.](#)

Today's action follows HUD's investigation of a [Secretary-initiated complaint filed on August 13, 2018](#). HUD alleges that Facebook unlawfully discriminates based on race, color, national origin, religion, familial status, sex, and disability by restricting who can view housing-related ads on Facebook's platforms and across the internet. Further, HUD claims Facebook mines extensive data about its users and then uses those data to determine which of its users view housing-related ads based, in part, on these protected characteristics.

"Facebook is discriminating against people based upon who they are and where they live," said HUD Secretary Ben Carson. "Using a computer to limit a person's housing choices can be just as discriminatory as slamming a door in someone's face."

HUD General Counsel Paul Compton added, "Even as we confront new technologies, the fair housing laws enacted over half a century ago remain clear—discrimination in housing-related advertising is against the law. Just because a process to deliver advertising is opaque and complex doesn't mean that it exempts Facebook and others

from our scrutiny and the law of the land. Fashioning appropriate remedies and the rules of the road for today's technology as it impacts housing are a priority for HUD.”

The Fair Housing Act prohibits discrimination in housing and in housing-related services, including online advertisements, based on race, color, national origin, religion, sex, disability, or familial status.

[Here is the complete article.](#)

Source: HUD.gov

Other Articles of Interest

- [CUNA Final Rule Analyses](#)
- [NCUA's Manuals and Guides](#)

Advocacy Highlight

FASB Votes Against Proposing Changes to CECL

The Financial Accounting Standards Board voted unanimously against formally issuing changes to the [CECL accounting standard](#) that would have affected how credit losses are recorded. The [changes](#) were the subject of a January roundtable at FASB's headquarters in Norwalk, CT.

Source: CUNA Advocacy

CUNA's Advocacy Resources

- [The Week Ahead in Washington – April 8, 2019](#)
- [CUNA's 2019 Advocacy Agenda](#)
- [Input to lawmakers and regulators](#)
- [CUNA Advocacy page](#)
- [CUNA's Removing Barriers blog](#)
- [CUNA's Priorities](#)
- [Actions You Can Take](#)

Compliance Calendar

- May 27th, 2019: Memorial Day - Federal Holiday
- June 21st, 2019: Return for Questionable Transaction (Effective Date)
- July 1st, 2019: Loans in Areas Having Special Flood Hazards (Effective Date)
- July 4th, 2019: Independence Day - Federal Holiday

- August 19th, 2019: Payday Lending, Vehicle Title, and Certain High-Cost Installment Loans (CFPB)

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