



Compliance eNewsletter

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InfoSight News

FFIEC Cybersecurity Assessment Tool

In June 2015, the Federal Financial Institutions Examination Council (FFIEC) launched their Cybersecurity Assessment Tool to help institutions identify their risks and assess their cybersecurity preparedness. NCUA encourages all credit unions to use the FFIEC tool to manage cyber security risks. While the use of the tool is not mandatory, NCUA examiners are incorporating the tool into their examination process. For additional information and access to NCUA resources, visit your Security Channel today!

Compliance News

ITIN Expiration Alert

The [IRS has issued a reminder](#) that taxpayers with expiring Individual Taxpayer Identification Numbers (ITINs) can get their them renewed more quickly and avoid refund delays next year by submitting their renewal application now. An ITIN is a tax ID number used by taxpayers who don't qualify to get a Social Security number. Any ITIN with middle digits 83, 84, 85, 86 or 87 will expire at the end of this year. In addition, any ITIN not used on a tax return in the past three years will expire. As a reminder, ITINs with middle digits 70 through 82 that expired in 2016, 2017 or 2018 can also be renewed.

Source: IRS

CFPB Issues Final HMDA Rule to Provide Relief to Smaller Institutions

The [Consumer Financial Protection Bureau has announced](#) its [approval of a rule](#) that finalizes certain aspects of its May 2019 Notice of Proposed Rulemaking under the Home

Mortgage Disclosure Act (HMDA). It extends for two years the current temporary threshold for collecting and reporting data about open-end lines of credit under HMDA. The rule also clarifies partial exemptions from certain HMDA requirements that Congress added in the Economic Growth, Regulatory Relief, and Consumer Protection Act (EGRRCPA).

The rule will be effective in two stages, on January 1, 2020, and January 1, 2022. The CFPB intends to issue a separate final rule next year addressing changes to the permanent thresholds for closed-end and open-end transactions.

CFPB financial law task force announced

The [Consumer Financial Protection Bureau has announced](#) that it will establish a task force to examine ways to harmonize and modernize federal consumer financial laws. The Task Force on Federal Consumer Financial Law will examine the existing legal and regulatory environment facing consumers and financial services providers and report to Director Kraninger its recommendations for ways to improve and strengthen consumer financial laws and regulations.

Source: CFPB

Regulators issue joint statement on digital assets

The U.S. Commodity Futures Trading Commission (CFTC), Financial Crimes Enforcement Network (FinCEN) and the SEC have [issued a joint statement](#) to remind persons engaged in activities involving digital assets of their anti-money laundering and countering the financing of terrorism (AML/CFT) obligations under the Bank Secrecy Act (BSA):

- AML/CFT obligations apply to entities that the BSA defines as “financial institutions,” such as futures commission merchants and introducing brokers obligated to register with the CFTC, money services businesses (MSBs) as defined by FinCEN, and broker-dealers and mutual funds obligated to register with the SEC. Among those AML/CFT obligations are the requirement to establish and implement an effective anti-money laundering program (AML Program) and recordkeeping and reporting requirements, including suspicious activity reporting (SAR) requirements.

Source: FinCEN

Advocacy Highlight

Senators introduced S. 2563, ILLICIT CASH Act

Recently, S. 2563, the Improving Laundering Laws and Increasing Comprehensive Information Tracking of Criminal Activity in Shell Holdings (ILLICIT CASH) Act was [introduced in the Senate](#).

This bill addresses the redundancies, unnecessary burdens, and opportunities for efficiencies within the Bank Secrecy Act/Anti-Money Laundering (BSA/AML) statutory framework. However, it is important to note that regulatory regimes like the Bank Secrecy Act can cause an undue burden, particularly for smaller financial institutions, and should be a scalable framework.

CUNA's Advocacy Resources

- [This Week in Washington – October 15, 2019](#)
- [Input to lawmakers and regulators](#)
- [CUNA Advocacy page](#)

Compliance Calendar

- October 22nd, 2019: Appraisals (NCUA)
- October 22nd, 2019: Fidelity Bonds (NCUA)
- November 11th, 2019: Veterans Day - Federal Holiday
- November 24th, 2019: SAFE Act. – MLO Registration
- November 28th, 2019: Thanksgiving Day - Federal Holiday

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