



Compliance eNewsletter

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InfoSight News

InfoSight Highlight: Compliance Connection Video – **NEW**

[New Video for 4th Q 2019 and 1st Q 2020!](#) This presentation provides an overview of regulatory changes that may be impacting the credit union, effective in the 4th quarter of 2019 and 1st quarter of 2020. Included are:

- NCUA changes
- CFPB updates
- NACHA Fast Funds Availability

Compliance News

NCUA Board to vote on RBC Rule

The NCUA board is expected to vote this week on a final rule that likely will delay the effective date of its Risk-Based Capital regulation but will not discuss a plan governing credit union-bank purchases that Chairman Rodney Hood said the agency would consider by the end of the year.

A key House Republican said this week he is worried about that trend, raising the possibility that financial institutions might be using the process to evade taxes.

Agency officials declined to discuss the status of any [credit union-bank purchase plan](#).

Earlier this year, the board approved a proposed rule that would delay the effective date of the RBC rule from Jan. 1, 2020 to Jan. 1, 2022. The lone Democrat on the board, Todd Harper, voted against that plan.

The exact proposal to be voted on will not be available until the Dec. 12 board meeting.

Source: NCUA

Russian nationals charged with banking cybercrimes

The U.S. Department of Justice has joined with the U.S. Department of State and the United Kingdom's National Crime Agency in charging two Russian nationals, Maksim Y. Yakubets and Igor Turashev, with a vast and long-running cybercrime spree that stole from thousands of individuals and organizations in the United States and abroad. They are charged with an effort that infected tens of thousands of computers with a malicious code called Bugat. Once installed, the computer code, also known as Dridex or Cridex, allowed the criminals to steal banking credentials and funnel money directly out of victims' bank accounts. Their names and those of their associates have been added to the SDN List.

- FBI [press release](#)
- Justice Department [press release](#)

Source: Treasury Department

FinCEN report on increase in fraud against elders

A report has been [released by FinCEN](#) indicating that elders face an increased threat to their financial security by both domestic and foreign actors. Elder financial exploitation Suspicious Activity Report filings increased dramatically over the six-year study period, from about 2,000 filings per month in 2013 to a peak of nearly 7,500 filings per month in August 2019. The yearly dollar amount of suspicious activity reported for elder financial exploitation also rose.

FinCEN Director Kenneth A. Blanco said the SARs filed by financial institutions are used to protect the country and its people from harm and provide unique and valuable information on crime and other threats happening in the U.S. and around the world impacting families and communities. He said, "These SARs are also important to filer banks and MSBs because they show trends and patterns in criminal activity. Every financial institution wants to protect its customers, and SAR reporting helps them do that. Awareness of these reporting trends and potential exploitation methods can also help consumers protect themselves." Additional analysis is provided in the [Financial Trend Analysis: Elders Face Increased Financial Threat from Domestic and Foreign Actors](#)

Source: FinCEN

Advocacy Highlight

Proposed Regulations Needing Comments:

- [Interagency Guidance on Credit Risk Review Systems \(due 12/16/19\)](#)
- [Interagency Guidance on Allowances for Credit Losses \(due 12/16/19\)](#)
- [Uniform Mortgage-Backed Securities \(UMBS\) pooling practices \(extended due date 1/21/20\)](#)
- [RFI re Integrated Mortgage Disclosures Under RESPA \(Reg X\) and TILA \(Reg Z\) Rule Assessment](#)

CUNA's Advocacy Resources:

- [This Week in Washington – December 9, 2019](#)
- [CUNA Advocacy page](#)

Compliance Calendar

- December 25th, 2019: Christmas Day - Federal Holiday
- December 31st, 2019: NMLS annual review period ends
- January 1st, 2020: Annual Updates
- January 1st, 2020: HMDA Thresholds/Regulation C (CFPB)
- January 1st, 2020: Risk-Based Capital (NCUA)