

Inf Sight Newsletter

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Highlights

RecoveryPro BUSINESS CONTINUITY PLANNING



**Plan and
prepare to
recover**

**Analyze and
assess risks**

**Validate and
maintain your
BCP**

Are you prepared for workflow interruptions? From pandemics to power-outages, RecoveryPro is here to help you prepare for the unexpected and keep your Credit Union running and your employees, members, and assets safe. Learn more about how [RecoveryPro](#) can help your Credit Union today!

Compliance and Advocacy News & Highlights

2022 International Credit Union Day theme announced

This year's theme for International Credit Union (ICU) Day is "Empower Your Financial Future with a Credit Union™," which will take place on Thursday, Oct. 20.

International Credit Union Day festivities include community fundraisers, contests, picnics, and parades. Sponsored by CUNA Strategic Services partner Zogo Finance, the annual celebration aims to help more people improve their financial well-being through accessible and affordable products and services provided by their local credit union.

EMPOWER encourages the U.S. credit union community to look beyond the borders of its local communities to donate to the campaign in support of growing credit union membership through credit union development while sharing stories of empowerment locally, nationally, and internationally.

"There are still 1.4 billion people across the globe who are unbanked. Credit unions truly have the perfect business model to empower their financial future and that is a message we hope our entire global movement will celebrate and promote on Thursday, October 20," said Elissa McCarter Laborde, president/CEO of World Council of Credit Unions.

For more information, [please visit the CUNA website](#).

Source: CUNA

CDFI Fund Update on CDFI Certification Application Process

CDFI Fund will pause acceptance of new CDFI Certification Applications and Target Market Modifications for six months to prepare for launch of the revised CDFI Certification Application and reporting requirements

In May 2020, the U.S. Department of the Treasury's Community Development Financial Institutions Fund (CDFI Fund) [requested public comment on the application and reporting requirements for Certified Community Development Financial Institutions \(CDFIs\)](#).

In the coming weeks, the revised CDFI Certification Application, ACR, and updated methods for collecting transactional level data from Certified CDFIs will be released for a second round of public comment by the Office of Management and Budget (OMB). This will be the last opportunity for public input on the revised CDFI Certification Application and reporting requirements before they are implemented on April 3, 2023. The CDFI Fund will communicate when the revised materials are available for review and comment.

In order to complete preparations needed to deploy the new CDFI Certification Application and reporting tools, the CDFI Fund will pause acceptance of new CDFI Certification Applications and requests for Target Market modifications for a period of six months beginning on October 1, 2022. The CDFI Fund will resume accepting new CDFI Certification Application submissions and requests for Target Market modifications on April 3, 2023. The new CDFI Certification Application will be in effect

at this time for those organizations applying for CDFI Certification. Existing CDFIs will have a one-year grace period to comply with the new CDFI Certification criteria.

During the blackout period, CDFIs will be required to be in a state of good standing with respect to their Certification status. To facilitate this process, the CDFI Fund will review all currently pending CDFI Certification Applications and Target Market modification requests (as well as all new Applications and Target Market modification requests) submitted before October 1, 2022, by April 3, 2023. Organizations either in the process of applying for CDFI Certification or that intend to do so in the near future will have until 11:59 p.m. ET on September 30, 2022 to submit CDFI Certification Applications or Target Market Modification Applications through the CDFI Fund's Awards Management Information System (AMIS).

Any CDFI Certification Applications or Target Market Modification Applications received on or after October 1, 2022 will not be considered. All organizations wishing to apply for CDFI Certification, or to modify their Target Markets, after October 1, 2022 must apply after the blackout period ends on April 3, 2023 using the new CDFI Certification Application.

This pause does not affect the submission of reports required by the Office of Compliance Monitoring and Evaluation. Organizations must remain in compliance with all outstanding CDFI Fund awards (including CDFI/NACA Program Financial Assistance and Technical Assistance, Bank Enterprise Award Program, Small Dollar Loan Program, Capital Magnet Fund, and Rapid Response Program awards), New Markets Tax Credit Allocations, or CDFI Bond Guarantee Program reporting requirements.

For the full article and more information, [please visit the Dept. of Treasury Fund website.](#)

Source: CDFI Fund

CFPB and Justice Department Caution Auto Finance Companies about Servicemember Protections

The Department of Justice and the Consumer Financial Protection Bureau (CFPB) issued a joint letter today reminding auto finance companies of their responsibilities to recognize important legal protections for military families under the Servicemembers Civil Relief Act (SCRA). While servicemembers have the same rights as non-military borrowers, the SCRA provides additional rights to protect servicemembers and their families against unique financial challenges.

“Auto finance companies that play by the rules should not be disadvantaged by competitors that violate the legal rights of military families,” said CFPB Director Rohit Chopra. “The CFPB is closely monitoring the auto finance industry to ensure that servicemembers and their families are being treated fairly.”

“The Civil Rights Division is entrusted with the responsibility of ensuring that the rights of the brave men and women of our Nation’s armed forces are safeguarded from discrimination and unfair treatment,” said Assistant Attorney General Kristen Clarke. “We work every day to ensure that these rights, including those related to auto financing, are protected through litigation, outreach, and policy development.”

Recent CFPB research has shown that [servicemembers tend to carry more auto loan debt at younger ages](#) than their civilian counterparts, largely due to the need for transportation while living on a military base. They’re also commonly the target of unfair or predatory practices including costly loans

and expensive contracts because of the financial inexperience of many entering the service as young adults, combined with their steady paychecks and ability to structure payments through the military allotment system. CFPB's [Spring 2022 Supervisory Highlights](#) also uncovered unfair acts or practices, prohibited by the Consumer Financial Protection Act, in the auto servicing industry.

For the full article, [please visit CFPB](#)

Source: CFPB

Articles of Interest:

- [Time is running out for student loan servicers to help Servicemembers with student loans get debt relief](#)
- [CFPB, DOJ Order Trident Mortgage Company to Pay More Than \\$22 Million for Deliberate Discrimination Against Minority Families](#)

CUNA's Advocacy Resources:

- [Happenings in Washington \(Removing Barriers Blog\)](#)

WOCCU (World Council of Credit Unions Advocacy) Advocacy Resources:

- [Telegraph](#) – Current advocacy news world-wide.
- [Advocate Blog](#) – Check out recent updates!

Compliance Calendar

- **September 5th, 2022: Labor Day - Federal Holiday**
- **September 16th, 2022: NACHA – Micro-Entry Rule – Phase I**
- **October 1st, 2022: CFPB – General Qualified Mortgage Loan Amendments**
- **October 10th, 2022: Columbus Day - Federal Holiday (also recognized: Indigenous Peoples' Day)**