

InfoSight Highlight

Loans and Leasing: Appraisals

Because of recent NCUA amendments to appraisal rules found in NCUA [Part 722](#), the [Appraisals Topic](#) in the [Loans and Leasing channel](#) has been updated to include new content. The revisions amend and add to the definitions section of the rule and provide for additional exemptions for rural areas and for commercial transactions.

Compliance News

NCUA Final Rule on Appraisals Now in Effect

In its July meeting, NCUA's Board approved a [final rule](#) effective October 22, that amends the agency's real estate appraisal requirements for certain transactions as part of the [NCUA's regulatory reform agenda](#).

The final rule accomplishes four agency objectives:

1. Increases the threshold for required appraisals in commercial real estate transactions from the current \$250,000 to \$1 million;
2. Reorganizes the appraisal regulation to make it easier to determine when a written estimate or an appraisal is required;
3. Exempts real estate transactions located in rural areas from appraisal requirements if certain conditions are met; and
4. Amends the definitions section of the rule to reflect these changes.

NMLS Policy Guidebook Updated

An updated version of the [NMLS Policy Guidebook](#) has been posted to the NMLS Resource Center and the Regulator Resource Center. The updated NMLS Policy Guidebook explains the requirement to select a mortgage loan originator's Worker Classification when establishing a Company Relationship. The NMLS Policy Committee approved this policy in July.

FTC Takes Action Against Stalking Apps

You know that eerie feeling that someone is following your every move? If someone secretly installed a "stalking app" or "stalkerware" sold by Retina-X Studios, LLC, onto your mobile device, that strange sensation could be way more than a feeling. [A complaint against the developer and marketer](#) alleges violations of the FTC Act and the Children's Online Privacy Protection Act Rule.

FTC Alert: Scams and the Older Consumer: Some Surprising Findings

There are perceptions some people seem to have about older consumers; and then there's the data we see in fraud reports from consumers of that age group. [Protecting Older Consumers 2018-2019: A Report of the Federal Trade Commission](#) calls some common beliefs into question while offering concrete advice to help you, your employees, and others in your community protect older adults from fraud. Check out the sometimes-surprising findings in [this year's report](#) and consider what your business can do to fight back against fraud targeting older consumers.

CMG Webinar: Mobile Devices: The Next Frontier for Risk

Mobile devices are infused in almost every aspect of our day. However, there's a big difference when it comes to using your cellphone at work and using your cellphone for work related purposes. Either way, employees using their cellphones at work are exposing credit unions to several vulnerabilities such as mobile malware, phone scams, lost or stolen devices, unsecured Wi-Fi network threats, and more.

InfoSight
Compliance eNewsletter
October 23, 2019
Vol. 12, Issue 43

Created in partnership with
the Credit Union National
Association

Compliance Calendar

October 27

NCUA Call Report for September 30, 2019 Cycle Due

October 31

*Form UC-B6, "Quarterly Wage Contribution & Employment & Training Assessment Report"
*Form 941, Employer's Quarterly Federal Tax Return

November 24

SAFE Act. – MLO Registration

November 30

New Employee Forms W-4 & HW-4

December 31

*Claim for Exemption: Real Property Assessment - County of Hawaii
*Claim for Exemption: Real Property Assessment - County of Maui

January 1, 2020

*HMDA Thresholds/Regulation C (CFPB)
*Risk-Based Capital (NCUA)

February 1, 2020

Updated URLA required for Fannie and Freddie

March 20, 2020

Increasing the Same Day ACH Dollar Limit (Effective Date)

June 30, 2020

Supplementing Data Security Requirements (Effective Date)

Compliance Training

Join CUNA Mutual Group on November 13, for this free webinar to ensure you have robust securities and appropriate policies in place to ensure your credit union is best prepared to protect against mobile risks. The expert panelists will cover both internal and external exposures of mobile devices.

CMG RISK Alert: Cybercriminals Target Call Centers to Fraudulently Wire Funds

Call centers are being targeted to perpetrate wire transfer fraud. Fraudsters are requesting wires by phone, controlling or changing the callback number, and defeating out-of-wallet questions. To fund the wires, fraudsters are typically using advances against members' home equity line-of-credit loans HELOCs).

US-CERT:

- [FBI Releases Article on Defending Against E-Skimming](#): The FBI released an article to raise awareness on e-skimming threats. E-skimming occurs when an attacker injects malicious code onto a website to capture credit or debit card data or personally identifiable information (PII).
- [Google Releases Security Updates for Chrome](#): Google released Chrome version 78.0.3904.70 for Windows, Mac, and Linux. This version addresses vulnerabilities that an attacker could exploit to take control of an affected system. The Cybersecurity and Infrastructure Security Agency (CISA) encourages users and administrators to review the [Chrome Release](#) and apply the necessary updates.
- [Mozilla Releases Security Updates for Firefox and Firefox ESR](#): Mozilla released security updates to address vulnerabilities in Firefox and Firefox ESR.
- [Juniper Networks Releases Junos OS Security Advisory](#): Juniper Networks released a security update to address a vulnerability in Junos OS.
- [Cisco Releases Security Updates](#): Cisco released security updates to address vulnerabilities in Cisco products. For updates addressing lower severity vulnerabilities see the Cisco [Security Advisories page](#). The CISA encourages users and administrators to review the Cisco Advisories and apply the necessary updates.
- [Multiple Vulnerabilities in Pulse Secure VPN](#): The CERT Coordination Center released information on multiple vulnerabilities affecting Pulse Secure Virtual Private Network (VPN). These vulnerabilities have been targeted by advanced persistent threat (APT) actors. The CISA encourages users and administrators to review the resources for more information and to apply the necessary updates.

Advocacy Highlight

House Passes BSA Modernization Bill with CTR Threshold Adjustment

The House passed the CUNA-supported [Corporate Transparency Act of 2019](#), a bill offering BSA/AML updates; with an amendment that would index CTR thresholds for inflation and further study the impact of SARs.

CUNA Partners with FASB for December 19 CECL Webinar

CUNA will partner with the FASB for a [December 19 webinar](#) on the CECL standard, one of several CECL implementation workshops hosted by credit union organizations. FASB recently approved delaying CECL implementation for credit unions to January 2023.

The Nussle Report

The Nussle Report delivers CUNA's insights on key events and policy developments affecting credit unions. This report also provides a valuable window into CUNA's actions on behalf of member credit unions and reinforces the value of CUNA membership. Topics for this week include:

- Credit union movement celebrates ICU Day
- [FASB Board agrees to delay CECL](#)
- [New legislation hits on third-party vendor independence](#)
- [House and Senate hear from CFPB's Kraninger](#)
- [HMDA reform under consideration](#)

October 29

[Personal Accounts: Ownership, Authorization, Titling & Documentation \(Webinar\)](#)

October 30

[1099 Reporting: Foreclosures, Repossessions & Debt Settlements \(Webinar\)](#)

October 31

[New BSA Officer Training Part 2: Reviews, SARs, CDD, Technical Aspects & Real-Life Scenarios \(Webinar\)](#)

November 5

[Year-End Compliance Checklist \(Webinar\)](#)

November 6

[Top 10 Compliance Mistakes in Advertising \(Webinar\)](#)

November 7

[Understanding & Navigating ACH Rules for ODFIs \(Webinar\)](#)

November 12

[Regulation E Series: Provisional Credit Under Reg E: Rules, Best Practices & FAQs \(Webinar\)](#)

November 13

[Closing or Changing Accounts for Consumers & Businesses \(Webinar\)](#)

November 19

[When a Borrower Dies: Rules, Procedures & Liabilities \(Webinar\)](#)

November 20

[Robbery Preparedness: Meeting Your Annual Compliance Requirement \(Webinar\)](#)

November 21

[BSA Special Risks: Policy, Law Enforcement & Regulator Issues \(Webinar\)](#)

November 22-23

[Regulatory & Governmental Affairs Conference, Ala Moana Hotel](#)

Compliance Video

Compliance Outlook S. 2155, Part 2

Part Two: S. 2155 Economic Growth, Regulatory Relief, and Consumer Protection Act. This presentation is the second of our two-part update covering the changes resulting from the passage of S.2155 that may

- [Foundation gives \\$75,000 for financial health](#)
- [Partners FCU podcast touts Awareness Initiative](#)
- [CUNA economists forecast economic trends](#)

CUNA Advocacy Update

The CUNA Advocacy Update keeps you on top of the most important changes in Washington for credit union's and what CUNA is doing to monitor, analyze, and influence government agencies and federal law. Issues this week included:

- [The week ahead in Washington](#)
- [Concerns shared with HFSC on draft legislation including third-party vendor authority](#)
- [Director Kraninger testifies before HSFC and Senate Banking for CFPB's semi-annual report to Congress](#)
- [Agenda released: NCUA October meeting](#)
- [CUNA & WOCCU write in support of Cooperative Development Program funding](#)
- [Letter sent to Appropriations Committee leadership in support of CDRLF](#)

Pending Regulatory Comment Calls

The League encourages credit unions to use [PowerComment](#) to file comment letters with regulators on the items below. For more information regarding these proposals, please follow the links below:

- [Federal Reserve actions to support Interbank settlement of faster payments due to FED by November 7.](#)
- [Tech Sprints due to CFPB by November 8.](#)
- [Interagency Policy Statement on Allowances for Credit Losses due to NCUA by December 16.](#)
- [Interagency Guidance on Credit Risk Review Systems due to NCUA by December 16.](#)
- [Truth in Lending \(Reg Z\) Annual Threshold Adjustments due to CFPB by January 1, 2020.](#)

impact credit unions. Glory LeDu, League InfoSight CEO, provides a short breakdown for you.

Just a reminder that Compliance videos since 2014 can be found on YouTube at the [Compliance Connection channel](#), where they are generally updated quarterly.

If you have any questions or comments concerning this newsletter, please contact Dorie Fitchett, Regulatory Officer at dorie.fitchett@hcul.org, or directly @ 203.6412, or for neighbor islands toll-free @ 1.888.331.5646 ext. 412.