

# RKL Regulatory Compliance Report for Financial Institutions

## March 2019



RKL's quarterly compliance report identifies proposed and finalized, federally issued consumer compliance/regulatory items.

### JANUARY – FINAL ISSUANCES

<b>Topic</b>	<b>Agencies Release Annual CRA Asset-Size Threshold Adjustments for Small and Intermediate Small Institutions</b>
<b>Date</b>	Effective January 1, 2019
<b>Description</b>	<p>The federal bank regulatory agencies announced the annual adjustment to the asset-size thresholds used to define small bank, small savings association, intermediate small bank, and intermediate small savings association under the Community Reinvestment Act (CRA) regulations.</p> <p>The annual adjustments are required by the CRA rules. Financial institutions are evaluated under different CRA examination procedures based upon their asset-size classification. Those meeting the small and intermediate small institution asset-size thresholds are not subject to the reporting requirements applicable to large banks and savings associations unless they choose to be evaluated as a large institution.</p> <p>Annual adjustments to these asset-size thresholds are based on the change in the average of the Consumer Price Index for Urban Wage Earners and Clerical Workers (CPI-W), not seasonally adjusted, for each 12-month period ending in November, with rounding to the nearest million.</p> <p>As a result of the 2.59 percent increase in the CPI-W for the period ending in November 2018, the definitions of small and intermediate small institutions for CRA examinations will change as follows:</p> <ul style="list-style-type: none"> <li>• “Small bank” or “small savings association” means an institution that, as of December 31 of either of the prior two calendar years, had assets of less than \$1.284 billion.</li> <li>• “Intermediate small bank” or “intermediate small savings association” means a small institution with assets of at least \$321 million as of December 31 of both of the prior two calendar years and less than \$1.284 billion as of December 31 of either of the prior two calendar years.</li> </ul> <p>These asset-size threshold adjustments will be effective as stated in the final rule that will be published in the <i>Federal Register</i>. In addition, the agencies will post a list of the current and historical asset-size thresholds on the website of the Federal Financial Institutions Examination Council (<a href="https://www.ffiec.gov/cra">https://www.ffiec.gov/cra</a>).</p>
<b>Links / Additional Details</b>	<a href="https://www.occ.treas.gov/news-issuances/news-releases/2018/nr-ia-2018-139a.pdf">https://www.occ.treas.gov/news-issuances/news-releases/2018/nr-ia-2018-139a.pdf</a>

<b>Topic</b>	<b>Consumer Financial Protection Bureau (CFPB) Civil Penalty Inflation Adjustments</b>
<b>Date</b>	January 15, 2019
<b>Description</b>	CFPB is adjusting for inflation the maximum amount of each civil penalty within the Bureau's jurisdiction. These adjustments are required by the Federal Civil Penalties Inflation Adjustment Act of 1990, as amended by the Debt Collection Improvement Act of 1996 and further amended by the Federal Civil Penalties Inflation Adjustment Act Improvements Act of 2015. The inflation adjustments mandated by the Inflation Adjustment Act serve to maintain the deterrent effect of civil penalties and to promote compliance with the law. <b>Effective January 31, 2019.</b>
<b>Links / Additional Details</b>	<a href="https://www.federalregister.gov/documents/2019/01/31/2019-00488/civil-penalty-inflation-adjustments">https://www.federalregister.gov/documents/2019/01/31/2019-00488/civil-penalty-inflation-adjustments</a>

<b>Topic - NEWS</b>	<b>National Credit Union Association (NCUA) outlines supervisory priorities for 2019</b>
<b>Date</b>	January 14, 2019
<b>Description</b>	<p>Agency examiners will continue using the streamlined small credit union exam program procedures for most credit unions that have assets under \$50 million.</p> <p>For all other credit unions, examiners will conduct risk-focused examinations, concentrating on the areas of highest risk, new products and services, and compliance with federal regulations.</p> <p>In 2019, NCUA examiners will have increased flexibility to conduct suitable examination work offsite. In the agency's Flexible Examination Program (FLEX) pilot, examiners were able to conduct as much as 35% of examination time offsite, according to NCUA.</p> <p>NCUA expects this increased flexibility will reduce the time impact on credit unions, save on travel costs and increase staff productivity.</p> <p>NCUA's primary areas of supervisory focus for 2019 are:</p> <p>Bank Secrecy Act Compliance</p> <ul style="list-style-type: none"> <li>• Concentrations of Credit</li> <li>• <i>Consumer Compliance</i></li> <li>• Current Expected Credit Losses (CECL)</li> <li>• Information Systems and Assurance</li> <li>• Liquidity and Interest Rate Risks</li> </ul>
<b>Links / Additional Details</b>	<a href="https://news.cuna.org/articles/115418-compliance-ncua-outlines-supervisory-priorities-for-2019">https://news.cuna.org/articles/115418-compliance-ncua-outlines-supervisory-priorities-for-2019</a>

**FEBRUARY – FINAL ISSUANCES**

<b>Topic</b>	<b>Regulatory Capital Rule: Implementation and Transition of the Current Expected Credit Losses (CECL) Methodology for Allowances and Related Adjustments to the Regulatory Capital Rule and Conforming Amendments to Other Regulations</b>
<b>Date</b>	February 14, 2019
<b>Description</b>	The Office of the Comptroller of the Currency, the Board of Governors of the Federal Reserve System, and the Federal Deposit Insurance Corporation (collectively, the agencies) are adopting a final rule to address changes to credit loss accounting under U.S. generally accepted accounting principles, including banking organizations' implementation of the CECL methodology. The final rule provides banking organizations the option to phase in over a three-year period the day-one adverse effects on regulatory capital that may result from the adoption of the new accounting standard. In addition, the final rule revises the agencies' regulatory capital rule, stress testing rules, and regulatory disclosure requirements to reflect CECL, and makes conforming amendments to other regulations that reference credit loss allowances. <b>Effective April 1, 2019</b>
<b>Links / Additional Details</b>	<a href="https://www.federalregister.gov/documents/2019/02/14/2018-28281/regulatory-capital-rule-implementation-and-transition-of-the-current-expected-credit-losses">https://www.federalregister.gov/documents/2019/02/14/2018-28281/regulatory-capital-rule-implementation-and-transition-of-the-current-expected-credit-losses</a>

<b>Topic</b>	<b>Five federal regulatory agencies issued a joint final rule to implement provisions of the Biggert-Waters Flood Insurance Reform Act of 2012 requiring regulated institutions to accept certain private flood insurance policies in addition to National Flood Insurance Program policies.</b>
<b>Date</b>	February 12, 2019
<b>Description</b>	The rule, which takes <b>effect July 1, 2019</b> : <ul style="list-style-type: none"> <li>• Implements the Biggert-Waters Act requirement that regulated lending institutions accept private flood insurance policies that satisfy criteria specified in the Act;</li> <li>• Allows institutions to rely on an insurer's written assurances in a private flood insurance policy stating the criteria are met;</li> <li>• Clarifies that institutions may, under certain conditions, accept private flood insurance policies that do not meet the Biggert-Waters Act criteria; and</li> <li>• Allows institutions to accept certain flood coverage plans provided by mutual aid societies, subject to agency approval.</li> </ul>
<b>Links / Additional Details</b>	<a href="https://occ.gov/news-issuances/news-releases/2019/nr-ia-2019-15a.pdf">https://occ.gov/news-issuances/news-releases/2019/nr-ia-2019-15a.pdf</a>

<b>Topic</b>	<b>Voluntary Private Education Loan Rehabilitation Programs</b>
<b>Date</b>	February 4, 2019
<b>Description</b>	<p>The FDIC and the Board of Governors of the Federal Reserve System jointly are providing an advisory on <i>Voluntary Private Education Loan Rehabilitation Programs</i> to make financial institutions aware of an amendment to section 623 of the Fair Credit Reporting Act (FCRA). This amendment is contained in section 602 of the Economic, Growth, Regulatory Relief and Consumer Protection Act (EGRRCPA). It gives consumers the opportunity to rehabilitate a private education loan with a previously reported default under certain conditions. Financial institutions that choose to establish a private education loan rehabilitation program under Section 602 of the EGRRCPA (Section 602 Program) that satisfies the statutory requirements, including written approval of the terms and conditions from their federal regulatory agency, are entitled to a safe harbor from potential claims under the FCRA related to removal of the reported default.</p> <p><b>Statement of Applicability to Institutions Under \$1 Billion in Total Assets:</b> This Financial Institution Letter applies to all FDIC-supervised institutions.</p> <p><b>Highlights:</b></p> <ul style="list-style-type: none"> <li>• Consumers may request that a financial institution remove a reported default regarding a private education loan.</li> <li>• As provided by EGRRCPA, a financial institution that chooses to offer a Section 602 Program that satisfies the statutory requirements is entitled to a safe harbor from potential claims under the FCRA of inaccurate reporting for removing a reported default from a consumer's credit report.</li> <li>• Financial institutions are not required to offer a Section 602 Program.</li> <li>• An existing or a future private education loan rehabilitation program will not be considered a Section 602 Program unless a financial institution designates it as such and it meets the statutory requirements of section 602 of EGRRCPA.</li> <li>• An FDIC-supervised financial institution that chooses to offer a Section 602 Program should contact its regional office.</li> <li>• The FDIC will provide feedback within 120 days of receiving a written request.</li> </ul>
<b>Links / Additional Details</b>	<a href="https://www.fdic.gov/news/news/financial/2019/fil19005.pdf">https://www.fdic.gov/news/news/financial/2019/fil19005.pdf</a>

**MARCH – FINAL ISSUANCES**

<b>Topic</b>	<b>Disclosure of Financial and Other Information by FDIC Insured State Nonmember Banks</b>
<b>Date</b>	March 18, 2019
<b>Description</b>	The Federal Deposit Insurance Corporation (FDIC) is amending its regulations by rescinding and removing its regulations entitled Disclosure of Financial and Other Information By FDIC-Insured State Nonmember Banks. Upon the removal of the regulations, all insured state nonmember banks and insured state-licensed branches of foreign banks (collectively, “banks”) would no longer be subject to the annual disclosure statement requirement set out in the existing regulations. The financial and other information that has been subject to disclosure by individual banks under the regulations is publicly available through the FDIC’s website. <b>Effective: April 17, 2019</b>
<b>Links / Additional Details</b>	<a href="https://www.federalregister.gov/documents/2019/03/18/2019-04944/disclosure-of-financial-and-other-information-by-fdic-insured-state-nonmember-banks">https://www.federalregister.gov/documents/2019/03/18/2019-04944/disclosure-of-financial-and-other-information-by-fdic-insured-state-nonmember-banks</a>

<b>Topic</b>	<b>List of Foreign Financial Institutions Subject to Correspondent Account or Payable-Through Account Sanctions (CAPTA List)</b>
<b>Date</b>	March 15, 2019
<b>Description</b>	The Department of the Treasury’s Office of Foreign Assets Control (OFAC) is amending the Iranian Financial Sanctions Regulations (IFSR) and the Hizbollah Financial Sanctions Regulations (HFSR) to incorporate references to the new List of Foreign Financial Institutions Subject to Correspondent Account or Payable-Through Account Sanctions (CAPTA List) <b>Effective: March 15, 2019</b>
<b>Links / Additional Details</b>	<a href="https://www.federalregister.gov/documents/2019/03/15/2019-04842/list-of-foreign-financial-institutions-subject-to-correspondent-account-or-payable-through-account">https://www.federalregister.gov/documents/2019/03/15/2019-04842/list-of-foreign-financial-institutions-subject-to-correspondent-account-or-payable-through-account</a>

**REMINDER:**

<b>Topic</b>	<b>NEW URLA – Uniform Residential Loan Application</b>
<b>Date</b>	Availability 7/1/19
<b>Description</b>	<p>At the direction of the Federal Housing Finance Agency (FHFA), and in collaboration with industry partners and government agencies, Freddie Mac and Fannie Mae (the GSEs) have updated the Uniform Residential Loan Application (URLA) (<i>Freddie Mac Form 65 / Fannie Mae Form 1003</i>) and created a corresponding standardized dataset – the Uniform Loan Application Dataset (ULAD). The ULAD maps each data field on the redesigned URLA to equivalent data point(s) in the corresponding Mortgage Industry Standards Maintenance Organization (MISMO) v3.4 Reference Model.</p> <p>The redesigned URLA form provides lenders and borrowers with greater clarity and an easier, more consumer-friendly loan application. The results represent the culmination of extensive industry collaboration.</p> <p>The ULAD Initiative, which is part of the Uniform Mortgage Data Program® (UMDP), continues to promote data standards by providing common and clear definitions. UMDP provides transparency and makes it easier to share data among various stakeholders within the industry.</p>
<b>Links / Additional Details</b>	<p><a href="https://www.fanniemae.com/singlefamily/uniform-residential-loan-application">https://www.fanniemae.com/singlefamily/uniform-residential-loan-application</a></p> <p><a href="http://www.freddie.com/singlefamily/sell/ulad.html">http://www.freddie.com/singlefamily/sell/ulad.html</a></p>

**FEBRUARY – PROPOSED ISSUANCES**

<b>Topic</b>	<b>Agencies Propose Rule Exempting Community Banks from Volker Rule</b>
<b>Date</b>	February 8, 2019
<b>Description</b>	Notice of Proposed Rulemaking (NPR) that would exempt from the Volcker Rule small banks that have total consolidated assets equal to \$10 billion or less and total trading assets and liabilities equal to five percent or less of total consolidated assets. This SPR would implement provisions of the Economic Growth, Regulatory Relief, and Consumer Protection Act.
<b>Links / Additional Details</b>	<a href="https://www.federalregister.gov/documents/2019/02/08/2018-27002/regulatory-capital-rule-capital-simplification-for-qualifying-community-banking-organizations">https://www.federalregister.gov/documents/2019/02/08/2018-27002/regulatory-capital-rule-capital-simplification-for-qualifying-community-banking-organizations</a>

<b>Topic</b>	<b>Delay of Compliance Date for Payday, Vehicle Title, and Certain High-Cost Installment Loans</b>
<b>Date</b>	February 6, 2019
<b>Description</b>	The CFPB is proposing to delay the August 19, 2019 compliance date for the mandatory underwriting provisions of the regulation promulgated by the Bureau in November 2017 governing Payday, Vehicle Title, and Certain High-Cost Installment Loans.
<b>Links / Additional Details</b>	<a href="https://files.consumerfinance.gov/f/documents/cfpb_payday_nprm-2019-delay.pdf">https://files.consumerfinance.gov/f/documents/cfpb_payday_nprm-2019-delay.pdf</a>

<b>Topic</b>	<b>CFPB proposal to rescind mandatory underwriting provisions governing Payday, Vehicle Title, and Certain High-Cost Installment Loans</b>
<b>Date</b>	February 6, 2019
<b>Description</b>	The CFPB is proposing to rescind the mandatory underwriting provisions of the regulation promulgated by the Bureau in November 2017 governing Payday, Vehicle Title, and Certain High-Cost Installment Loans.
<b>Links / Additional Details</b>	<a href="https://www.consumerfinance.gov/policy-compliance/rulemaking/rules-under-development/payday-vehicle-title-and-certain-high-cost-installment-loans/">https://www.consumerfinance.gov/policy-compliance/rulemaking/rules-under-development/payday-vehicle-title-and-certain-high-cost-installment-loans/</a>

**MARCH – PROPOSED ISSUANCES**

<b>Topic</b>	<b>Advance notice of Proposed Rulemaking on Residential Property Assessed Clean Energy Financing</b>
<b>Date</b>	March 4, 2019
<b>Description</b>	The Bureau is issuing this advance notice of proposed rulemaking relating to residential Property Assessed Clean Energy (PACE) financing to aid implementation of the Economic Growth, Regulatory Relief, and Consumer Protection Act section 307.
<b>Links / Additional Details</b>	<a href="https://www.consumerfinance.gov/policy-compliance/rulemaking/rules-under-development/advance-notice-proposed-rulemaking-residential-property-assessed-clean-energy-financing/">https://www.consumerfinance.gov/policy-compliance/rulemaking/rules-under-development/advance-notice-proposed-rulemaking-residential-property-assessed-clean-energy-financing/</a>

<b>Topic</b>	<b>Advance notice of Proposed Rulemaking on Regulation D Reserve Requirements of Depository Institutions</b>
<b>Date</b>	March 12, 2019
<b>Description</b>	The Board of Governors of the Federal Reserve System (Board) is requesting comment on whether it should propose amendments to its Regulation D (Reserve Requirements of Depository Institutions, to lower the rate of interest paid on excess balances (“IOER”) maintained at Federal Reserve Banks (Reserve Banks) by eligible institutions that hold a very large proportion of their assets in the form of balances at Reserve Banks. <b>Comments must be received no later than May 13, 2019.</b>
<b>Links / Additional Details</b>	<a href="https://www.federalregister.gov/documents/2019/03/12/2019-04348/regulation-d-reserve-requirements-of-depository-institutions">https://www.federalregister.gov/documents/2019/03/12/2019-04348/regulation-d-reserve-requirements-of-depository-institutions</a>



**COMPLIANCE CALENDAR**

Effective Date	Implementing Rule / Regulation	Links to Information
January 1, 2018	Regulation C - HMDA	<p>Rule: <a href="https://www.federalregister.gov/documents/2015/10/28/2015-26607/home-mortgage-disclosure-regulation-c">https://www.federalregister.gov/documents/2015/10/28/2015-26607/home-mortgage-disclosure-regulation-c</a></p> <p>Compliance Guide: <a href="https://s3.amazonaws.com/files.consumerfinance.gov/f/documents/cfpb_hmda_small-entity-compliance-guide.pdf">https://s3.amazonaws.com/files.consumerfinance.gov/f/documents/cfpb_hmda_small-entity-compliance-guide.pdf</a></p> <p>Reportable Data: <a href="https://s3.amazonaws.com/files.consumerfinance.gov/f/documents/201710_cfpb_reportable-hmda-data_regulatory-and-reporting-overview-reference-chart.pdf">https://s3.amazonaws.com/files.consumerfinance.gov/f/documents/201710_cfpb_reportable-hmda-data_regulatory-and-reporting-overview-reference-chart.pdf</a></p> <p>Regulatory Relief (Interpretive Rule): <a href="https://s3.amazonaws.com/files.consumerfinance.gov/f/documents/bcftp_hmda_interpretive-procedural-rule_2018-08_executive-summary.pdf">https://s3.amazonaws.com/files.consumerfinance.gov/f/documents/bcftp_hmda_interpretive-procedural-rule_2018-08_executive-summary.pdf</a></p>
April 9, 2018	Real Estate Appraisals	<p>Joint Issuance: <a href="https://www.occ.treas.gov/news-issuances/federal-register/83fr15019.pdf">https://www.occ.treas.gov/news-issuances/federal-register/83fr15019.pdf</a></p>
April 19, 2018	Regulations X and Z – Successors in Interest	<p>Rule: <a href="https://www.federalregister.gov/documents/2018/03/12/2018-04823/mortgage-servicing-rules-under-the-truth-in-lending-act-regulation-z">https://www.federalregister.gov/documents/2018/03/12/2018-04823/mortgage-servicing-rules-under-the-truth-in-lending-act-regulation-z</a></p> <p>Rule: <a href="https://www.federalregister.gov/documents/2017/10/16/2017-21912/mortgage-servicing-rules-under-the-real-estate-settlement-procedures-act-regulation-x">https://www.federalregister.gov/documents/2017/10/16/2017-21912/mortgage-servicing-rules-under-the-real-estate-settlement-procedures-act-regulation-x</a></p> <p>Compliance Guide: <a href="https://s3.amazonaws.com/files.consumerfinance.gov/f/documents/cfpb_mortserv_guide_v3.1.pdf">https://s3.amazonaws.com/files.consumerfinance.gov/f/documents/cfpb_mortserv_guide_v3.1.pdf</a></p>
April 19, 2018	Regulations X and Z – Bankruptcy Periodic Statements	<p>Rule: <a href="https://files.consumerfinance.gov/f/documents/cfpb_mortgage-servicing_final-rule_2018-amendments.pdf">https://files.consumerfinance.gov/f/documents/cfpb_mortgage-servicing_final-rule_2018-amendments.pdf</a></p>

		Compliance Guide: <a href="https://s3.amazonaws.com/files.consumerfinance.gov/f/documents/cfpb_mortserv_guide_v3.1.pdf">https://s3.amazonaws.com/files.consumerfinance.gov/f/documents/cfpb_mortserv_guide_v3.1.pdf</a>
May 11, 2018	FinCEN – Customer Due Diligence/Beneficial Ownership Rule	Rule: <a href="https://www.federalregister.gov/documents/2016/05/11/2016-10567/customer-due-diligence-requirements-for-financial-institutions">https://www.federalregister.gov/documents/2016/05/11/2016-10567/customer-due-diligence-requirements-for-financial-institutions</a>  FAQ's: <a href="https://www.fincen.gov/sites/default/files/2018-04/FinCEN_Guidance_CDD_FAQ_FINAL_508_2.pdf">https://www.fincen.gov/sites/default/files/2018-04/FinCEN_Guidance_CDD_FAQ_FINAL_508_2.pdf</a>
June 1, 2018	FinCEN - Updates to SAR	Issuance: <a href="https://bsaefiling.fincen.treas.gov/docs/SARXMLAnnouncement_Jan2018.pdf">https://bsaefiling.fincen.treas.gov/docs/SARXMLAnnouncement_Jan2018.pdf</a>
June 1, 2018	CFPB – TRID (Good Faith Determination)	Final Rule: <a href="https://s3.amazonaws.com/files.consumerfinance.gov/f/documents/cfpb_tila-respa_final-rule_amendments-to-federal-mortgage-disclosure-requirements.pdf">https://s3.amazonaws.com/files.consumerfinance.gov/f/documents/cfpb_tila-respa_final-rule_amendments-to-federal-mortgage-disclosure-requirements.pdf</a>
July 1, 2018	Regulation CC – Expedited Funds Availability	Rule: <a href="https://www.federalregister.gov/documents/2017/06/15/2017-11379/availability-of-funds-and-collection-of-checks">https://www.federalregister.gov/documents/2017/06/15/2017-11379/availability-of-funds-and-collection-of-checks</a>
October 1, 2018	Amendments to Regulations X and Z - TRID	Rule: <a href="https://www.federalregister.gov/documents/2017/08/11/2017-federal-mortgage-disclosure-requirements-under-the-truth-in-lending-act">https://www.federalregister.gov/documents/2017/08/11/2017-federal-mortgage-disclosure-requirements-under-the-truth-in-lending-act</a>  Compliance Guide: <a href="https://s3.amazonaws.com/files.consumerfinance.gov/f/documents/cfpb_2018-rule_executive-summary.pdf">10_cfpb_KBYO-Small-Entity-Compliance-Guide_v5.pdf</a>  Executive Summaries: <a href="https://s3.amazonaws.com/files.consumerfinance.gov/f/documents/cfpb_2018-rule_executive-summary.pdf">https://s3.amazonaws.com/files.consumerfinance.gov/f/documents/cfpb_2018-rule_executive-summary.pdf</a>  <a href="https://s3.amazonaws.com/files.consumerfinance.gov/f/documents/201708_cfpb_2017-TILA-RESPA-Rule-Detailed-Summary-of-Changes-and-Clarifications.pdf">https://s3.amazonaws.com/files.consumerfinance.gov/f/documents/201708_cfpb_2017-TILA-RESPA-Rule-Detailed-Summary-of-Changes-and-Clarifications.pdf</a>
October 3, 2018	Joint Statement on Sharing Resources to Improve BSA Compliance	Interagency Statement: <a href="https://occ.gov/news-issuances/news-releases/2018/nr-ia-2018-107a.pdf">https://occ.gov/news-issuances/news-releases/2018/nr-ia-2018-107a.pdf</a>
January 1, 2019	CFPB – FCRA ceilings on allowable charges	Rule: <a href="https://s3.amazonaws.com/files.consumerfinance.gov/f/documents/bcf">https://s3.amazonaws.com/files.consumerfinance.gov/f/documents/bcf</a>

## Regulatory Compliance Report

January 1, 2019	CFPB – annual threshold for Consumer Leasing	Rule: <a href="https://www.federalregister.gov/documents/2018/11/23/2018-25396/consumer-leasing-regulation-m">https://www.federalregister.gov/documents/2018/11/23/2018-25396/consumer-leasing-regulation-m</a>
January 1, 2019	CFPB announces annual adjustment to Appraisals for Higher-Priced Mortgage Loans Exemption	Rule: <a href="https://www.federalregister.gov/documents/2018/11/23/2018-25400/appraisals-for-higher-priced-mortgage-loans-exemption-threshold">https://www.federalregister.gov/documents/2018/11/23/2018-25400/appraisals-for-higher-priced-mortgage-loans-exemption-threshold</a>
January 1, 2019	CFPB – TILA Asset Size Exemption	Rule: <a href="https://s3.amazonaws.com/files.consumerfinance.gov/f/documents/bcftp_final-rule_truth-in-lending-act-escrows_threshold-adjustment_12-2018.pdf">https://s3.amazonaws.com/files.consumerfinance.gov/f/documents/bcftp_final-rule_truth-in-lending-act-escrows_threshold-adjustment_12-2018.pdf</a>
January 1, 2019	CFPB – TILA Exemption Threshold Adjustment	Rule: <a href="https://www.federalregister.gov/documents/2018/11/23/2018-25398/truth-in-lending-regulation-z">https://www.federalregister.gov/documents/2018/11/23/2018-25398/truth-in-lending-regulation-z</a>
January 1, 2019	CFPB – HMDA Reg C Asset Size Exemption	Rule: <a href="https://s3.amazonaws.com/files.consumerfinance.gov/f/documents/bcftp_final-">https://s3.amazonaws.com/files.consumerfinance.gov/f/documents/bcftp_final-</a>
January 1, 2019	Liability Provisions Under Reg CC	Rule: <a href="https://www.govinfo.gov/content/pkg/FR-2018-09-17/pdf/2018-20029.pdf">https://www.govinfo.gov/content/pkg/FR-2018-09-17/pdf/2018-20029.pdf</a>
January 1, 2019	CRA Asset Size Adjustment for Small and Intermediate-Small Institutions	Rule: <a href="https://www.federalregister.gov/documents/2018/12/27/2018-27791/community-reinvestment-act-regulations">https://www.federalregister.gov/documents/2018/12/27/2018-27791/community-reinvestment-act-regulations</a>
January 31, 2019	CFPB Civil Penalty Inflation Adjustments	Rule: <a href="https://www.federalregister.gov/documents/2019/01/31/2019-00488/civil-penalty-inflation-adjustments">https://www.federalregister.gov/documents/2019/01/31/2019-00488/civil-penalty-inflation-adjustments</a>
March 15, 2019	List of Foreign Financial Institutions Subject to Correspondent Account or Payable-Through Account Sanctions (CAPTA List)	Rule: <a href="https://www.federalregister.gov/documents/2019/03/15/2019-04842/list-of-foreign-financial-institutions-subject-to-correspondent-account-or-payable-through-account">https://www.federalregister.gov/documents/2019/03/15/2019-04842/list-of-foreign-financial-institutions-subject-to-correspondent-account-or-payable-through-account</a>
April 1, 2019	Regulatory Capital Rule: Implementation and Transition of the Current Expected Credit Losses Methodology for Allowances and Related Adjustments to the Regulatory Capital Rule and Conforming Amendments to Other Regulations	Rule: <a href="https://www.federalregister.gov/documents/2019/02/14/2018-28281/regulatory-capital-rule-implementation-and-transition-of-the-current-expected-credit-losses">https://www.federalregister.gov/documents/2019/02/14/2018-28281/regulatory-capital-rule-implementation-and-transition-of-the-current-expected-credit-losses</a>

## Regulatory Compliance Report

April 1, 2019	Regulation Z – Prepaid Rule	<p>Rule: <a href="https://www.federalregister.gov/documents/2016/11/22/2016-24503/prepaid-accounts-under-the-electronic-fund-transfer-act-regulation-e-and-the-truth-in-lending-act">https://www.federalregister.gov/documents/2016/11/22/2016-24503/prepaid-accounts-under-the-electronic-fund-transfer-act-regulation-e-and-the-truth-in-lending-act</a></p> <p>Compliance Guide:  <a href="https://s3.amazonaws.com/files.consumerfinance.gov/f/documents/cfpb_prepaid_small-entity-compliance-guide.pdf">https://s3.amazonaws.com/files.consumerfinance.gov/f/documents/cfpb_prepaid_small-entity-compliance-guide.pdf</a></p>
April 17, 2019	Disclosure of Financial and Other Information by FDIC Insured State Nonmember Banks	<p>Rule: <a href="https://www.federalregister.gov/documents/2019/03/18/2019-04944/disclosure-of-financial-and-other-information-by-fdic-insured-state-nonmember-banks">https://www.federalregister.gov/documents/2019/03/18/2019-04944/disclosure-of-financial-and-other-information-by-fdic-insured-state-nonmember-banks</a></p>
July 1, 2019	Implement provisions of the Biggert-Waters Flood Insurance Reform Act of 2012 requiring regulated institutions to accept certain private flood insurance policies in addition to National Flood Insurance Program policies.	<p>Rule:  <a href="https://www.federalreserve.gov/newsevents/pressreleases/files/bcreg20190212a1.pdf">https://www.federalreserve.gov/newsevents/pressreleases/files/bcreg20190212a1.pdf</a></p>
July 1, 2019	NEW Uniform Residential Loan Application - URLA	<p><a href="https://www.fanniemae.com/singlefamily/uniform-residential-loan-application">https://www.fanniemae.com/singlefamily/uniform-residential-loan-application</a>  <a href="http://www.freddiemac.com/singlefamily/sell/ulad.html">http://www.freddiemac.com/singlefamily/sell/ulad.html</a></p>
August 19, 2019	Payday Lending Rule	<p>Rule: <a href="https://www.federalregister.gov/documents/2017/11/17/2017-21808/payday-vehicle-title-and-certain-high-cost-installment-loans">https://www.federalregister.gov/documents/2017/11/17/2017-21808/payday-vehicle-title-and-certain-high-cost-installment-loans</a></p> <p>Executive Summary:  <a href="https://s3.amazonaws.com/files.consumerfinance.gov/f/documents/201710_cfpb_executive-summary_payday-loans-rule.pdf">https://s3.amazonaws.com/files.consumerfinance.gov/f/documents/201710_cfpb_executive-summary_payday-loans-rule.pdf</a></p>

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