

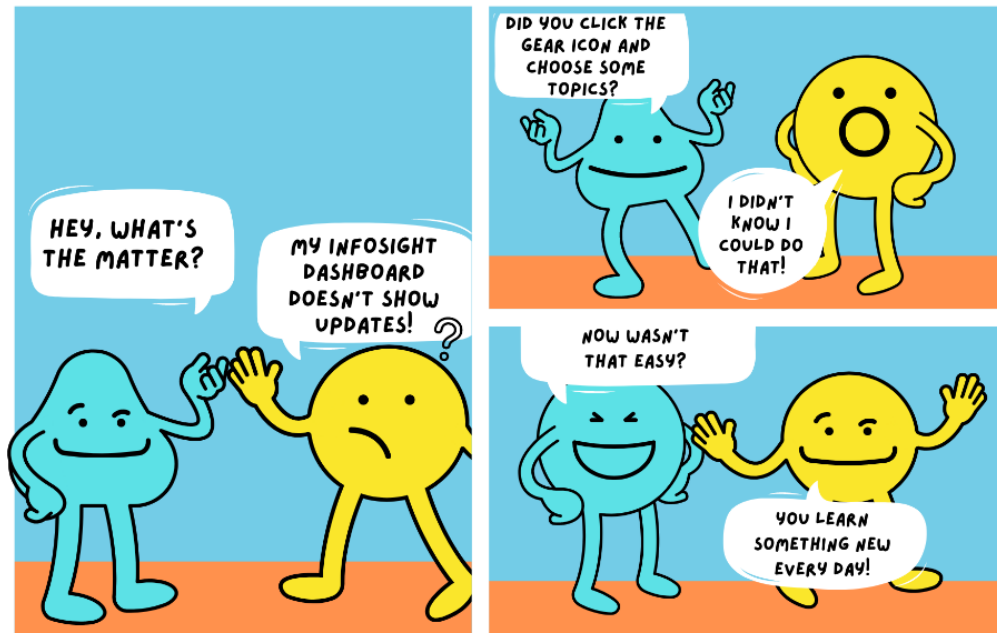


InfoSight Newsletter

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InfoSight News

InfoSight ADVENTURES



Agencies Issue Statement and Request for Information on Bank Secrecy Act/Anti-Money Laundering Compliance

The federal banking agencies, in consultation with the Financial Crimes Enforcement Network and the National Credit Union Administration, [recently issued a joint statement](#) addressing how risk management principles described in the “[Supervisory Guidance on Model Risk Management](#)” relate to systems or models used by banks to assist in complying with the requirements of Bank Secrecy Act (BSA) laws and regulations. The statement further notes that it does not alter existing BSA/anti-money laundering (AML) legal or regulatory requirements or establish new supervisory expectations, and that no specific model risk management framework is required.

The agencies, along with the National Credit Union Administration and the Financial Crimes Enforcement Network, also announced a request for information (RFI) on the extent to which the principles discussed in the guidance support compliance by banks and credit unions with BSA/AML and Office of Foreign Assets Control requirements. The agencies are seeking comments and information to better understand bank practices and determine whether additional explanation or clarification may be helpful.

Source: NCUA

Freddie and Fannie to Limit Loan Eligibility to New QM Rule

Fannie Mae, in [Lender Letter LL-2021-09](#), and Freddie Mac, in [Guide Bulletin 2021-13](#), announced that any loans purchased by the GSEs after July 1, 2021, must conform to the requirements outlined in the CFPB’s recently finalized QM final rule. Both GSEs clarified that they will continue to buy loans that fall under the "GSE patch" that have application dates on or before June 30 and settlement dates before September 1, and are purchased as whole loans before September 1, or in mortgage-backed securities pools with an issue date on or before August 1.

Source: Fannie Mae, Freddie Mac

NWCUA Releases Economic, Community Impact Report

The Northwest Credit Union Association is providing its member credit unions with a [suite of resources](#) documenting credit unions’ economic and community impact throughout the past year. Credit union advocates in Idaho, Oregon and Washington have new, data-rich tools to support their advocacy and public awareness work this year. CUNA recently provided a [wonderful article](#) that provides additional information about this community impact.

Source: CUNA News

CFPB And Settleit Propose Settlement Order

The CFPB has [announced](#) an action against Settleit, Inc., a California-based online debt-settlement company, for taking advantage of consumers, failing to disclose its relationship to certain creditors, and steering consumers into high-cost loans offered by affiliated lenders. The Bureau has filed a [federal court complaint](#) alleging that Settleit, Inc. engaged in abusive acts or practices under the Consumer Financial Protection Act of 2010 (CFPA) and violated the Telemarketing Sales Rule (TSR).

Source: CFPB

Articles of Interest

- [Biden Proposes 22% Boost for CDFI Program](#)
- [Scammers target loved ones of COVID-19 victims](#)
- [Register for the Virtual CU FinHealth Conference \(April 21-23\)](#)
- [NASCUS Marijuana & Hemp eSchool \(June 9-11\)](#)
- [Florida Man Pleads Not Guilty to \\$1.5 Million PPP Loan Fraud Scheme Involving CUs](#)

CUNA's Advocacy Resources:

- [Happenings in Washington](#)

WOCCU Advocacy Resources:

- [Telegraph](#) – the most recent newsletter on current advocacy issues
- [Advocate Blog](#) – International advocacy trends and issues

Compliance Calendar

- May 31st, 2021: Memorial Day - Federal Holiday
- June 30th, 2021: [NACHA – Limitation on Warranty Claims](#)
- June 30th, 2021: [NACHA – Reversals](#)
- July 5th, 2021: Independence Day - Federal Holiday (observed)
- September 6th, 2021: Labor Day - Federal Holiday

Purely Michigan



Lake Superior Rocks in Spring

MCUL Events & Training for 2021!

- [Virtual Succession Planning](#) (Presented by DIFS with MCUL, April 28 & 29)
- [CU Supervisor Series](#)
Day One: May 11 | Understanding Supervision
Day Two: May 18 | Coaching in the Virtual World
- [Virtual BSA Workshop](#) (May 4 & 5)
- [Virtual CU Supervisory Series](#) (May 11 & 18)
- [Life Hack Your Marketing Department Webinar](#) (May 12)
- [Virtual CU Directors Conference](#) (May 12 & 13)
- [CUSG GRC Virtual Forum](#) (May 12, 19 & 26)

MI Compliance and Advocacy News

Compliance Network – Get Involved!

If you're interested in learning more about this great network of like-minded credit union compliance folks, please email [Tanis Campbell](#). She would love to get you signed up for the email listserv or know if you have any meeting topics that you would like to learn more about in 2021. She would also like to hear about any pandemic-related compliance issues or concerns that you are encountering. [Reach out to Tanis today!](#)

Compliance Helpline Q&A: Lookback Period on Filing a SAR

Question: We are completing an examination and it was suggested that we look back at some transactions on members' accounts that should have had SARs filed on them and weren't. Examiners want us to file SARs on those we find that should have been filed. When asked, they want us to go back at least one year. Is there a time period that won't let you file a SAR? They stated a late SAR is better than none at all, but we don't want to file a report that might be out of compliance.

Answer: The timing for filing a SAR is based on the knowledge or potential perception/appearances of suspicious activity. To that end, activity could have taken place 5 years ago, but if the credit union was just made aware of the suspicious nature of that activity, the filing clock starts there. So, in this instance, where the examiners are asking you to look back a year and review for suspicious activity, no, there is nothing preventing you from doing this. If, during the look back, you become aware of activity that is potentially suspicious, from that point, you have 30 days to file a SAR.

Have a compliance question? Be sure to email the Helpline at: ComplianceHelpline@mcu.org and [here's a reminder of the compliance resources](#) available to you!

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