



Compliance Journal

Special Focus

A Financial Institution’s Guide to Wisconsin’s Uniform Transfers to Minors Act.

Notice 2017-4

The Wisconsin Uniform Transfers to Minors Act is set forth in chapter 54 of the Wisconsin Statutes. Specifically, Wis. Stats. § 54.854 - 54.898. Collectively, these provisions govern Wisconsin’s Uniform Transfers to Minors Act accounts (WUTMA accounts). WUTMA accounts enable financial institutions to open accounts, with a custodian, to hold funds gifted or otherwise transferred to a minor, for the benefit of a minor.

Creating a WUTMA Account

Wis. Stat. § 54.870 outlines the manner of creating custodial property and effecting transfer, the designation of an initial custodian, and control of a WUTMA account. An instrument in the following form creates and transfers custodial property:

I, (name of transferor or name and representative capacity if a fiduciary) hereby transfer to (name of custodian), as custodian for (name of minor) under the Wisconsin Uniform Transfers to Minors Act, the following: (insert a description of the custodial property sufficient to identify it).

Dated:

....

(Signature)

.... (name of custodian) acknowledges

receipt of the property described above, as custodian for the minor named above under the Wisconsin Uniform Transfers to Minors Act.

Dated:

....

(Signature of Custodian)

In establishing a WUTMA account a financial institution is contracting with a custodian, who has the right to receive the property for the minor beneficiary. A transferor, as defined in Wis. Stat. § 54.854(14), may revocably nominate a custodian to receive the property for a minor by naming the custodian, followed in substance by the words: “as custodian for (name of minor) under the Wisconsin Uniform Transfers to Minors Act.” The nomination may name one or more persons as substitute custodians to whom the property must be transferred, in the order named, if the first nominated custodian dies before the transfer or is unable, declines or is ineligible to serve. The nomination may be made in a will, a trust, a deed, an instrument exercising a power of appointment or a writing designating a beneficiary of contractual rights which is registered with or delivered to the payor, issuer or other obligor of the contractual rights. Wis. Stat. § 54.858(1).

The nomination of a custodian under this section does not create custodial property until the nominating instrument becomes

irrevocable or a transfer to the nominated custodian is completed under Wis. Stat. § 54.870. Upon the creation of custodial property or the transfer to the nominated custodian is complete, the custodian has management and control of the WUTMA account.

Protection of Financial Institutions

While the WUTMA statutes outline the various powers and duties of a custodian, financial institutions are protected from liability, when certain criteria are met. Wis. Stat. § 54.884 outlines the exemption of third parties from liability. It provides that a 3rd person, in good faith and without court order, may act on the instructions of or otherwise deal with any person purporting to make a transfer or purporting to act in the capacity of a custodian and, in the absence of knowledge, is not responsible for determining any of the following: (1) The validity of the purported custodian’s designation; (2) The propriety of, or the authority under the Uniform Transfer to Minors Act for, any act of the purported custodian; (3) The validity or propriety under Uniform Transfer to Minors Act of any instrument or instructions executed or given either by the person purporting to make a transfer or by the purported custodian; (4) The propriety of the application of any property of the minor delivered to the purported custodian.

Selected Relevant WUTMA Provisions

Overall, the WUTMA statutes outline the intricacies of WUTMA accounts. Some provisions within chapter 54 have a direct impact on financial institutions and implicitly dictate how financial institutions should handle WUTMA accounts. Below, find examples of how some of these provisions impact financial institutions.

1. Wis. Stat. § 54.860 states: A person may make a transfer by irrevocable gift to, or the irrevocable exercise of a power of appointment in favor of, a custodian for the benefit of a minor under Wis. Stat. § 54.870. This provision highlights an important characteristic of a WUTMA account that financial institutions must be aware of. That is, the custodian, not the minor, is with whom the financial institution is contracting. While the property technically belongs to the minor, it is in the control of the custodian for the benefit of the minor. So, an institution should carefully consider whether to give information to an inquiring minor. It may be best for a minor to discuss balances with the custodian. If a minor believes funds are being used inappropriately, the minor could petition the court.
2. The termination of a WUTMA custodianship depends upon the type of gift or transfer made to the

custodian for the benefit of the minor. Wis. Stat. §54.892 states that the custodian must transfer, in an appropriate manner, the custodial property to the minor or the minor's estate upon the earlier of: (1) the minor's attainment of 21 years of age with respect to property transferred by gift under 54.860, or under a provision in a will or trust under 54.862; (2) the minor's attainment of 18 years of age for property transferred by certain other fiduciaries under 54.864 or obligors under 54.866; or (3) upon the minor's death. While most WUTMA custodianships will terminate upon the minor reaching the age of 21, it is up to the custodian rather than the institution to make this determination. Regardless of his or her age, if the named minor on a WUTMA account asserts that he or she is entitled to access funds on deposit, the named minor should be directed to the custodian to discuss this matter, or to the court if named minor believes that the custodian is acting improperly.

3. Wis. Stat. § 54.892 states that upon a minor's death, the custodian shall transfer, in an appropriate manner, the custodial property to the minor's estate. Such a provision means that Payable on Death beneficiary designations are not allowed on WUTMA accounts.

Questions and Answers

As WUTMA accounts have unique qualities, it is understandable that such accounts may lead to questions about how WUTMA accounts may impact decisions at your financial institution. Below, please find common questions from financial institutions regarding WUTMA accounts.

Q1: Can a minor deposit their paycheck in a WUTMA account?

A1: No. A minor's paycheck should not be deposited in a WUTMA account, as it does not constitute a gift or transfer. Only funds that are gifts or transfers may be deposited to a WUTMA accounts.

Additionally, the WUTMA account is managed and controlled by the custodian. Consequently, the minor will not have access to the deposited funds. Allowing a minor to deposit non-WUTMA funds in to a WUTMA account may lead to unnecessary disputes and complaints.

Q2: If a minor cannot deposit their paychecks in a WUTMA account, what account should my financial institution open?

A2: While an institution is generally free to contract with whomever it wishes, a risk in contracting with a minor alone is that a minor can void most contracts into which they have entered, by raising a defense of incapacity to contract based upon their age. Thus, if an individual account is opened with only the minor, and the minor raises this

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Wisconsin Bankers Association

4721 South Biltmore Lane,
P.O. Box 8880, Madison,
Wisconsin, 53708-8880

Senior Writers

Kristine Clevon
Scott Birrenkott
Hiriam L. Bradley

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Special Focus

defense, the bank would not be able to recoup, for example, any fees or charges, etc., assessed to the account. To avoid this situation, an institution should consider requiring a joint account, with joint and several liability, be opened between the minor and a parent, guardian or other individual who has reached the age of majority. If the minor raises the defense, in this type of account, the contract will remain valid with respect to the remaining party, and such party will still be liable for all fees and charges assessed on the account even if such fees and charges are attributable to the minor's activity on the account. Of course, an institution may also wish to consult with its own legal counsel regarding the risks and benefits of other accounts the institution may offer.

Q3: If a custodian dies but did not appoint a successor custodian, does a parent automatically become the new custodian?

A3: No. As stated in Wis. Stat. § 54.888(4), if a custodian is ineligible, dies or becomes incapacitated without having effectively designated a successor and the minor has attained the age of 14 years, the minor may designate as successor custodian, an adult

member of the minor's family, a conservator of the minor, as defined in Wis. Stat. § 54.01(3), or a trust company. If the minor has not attained the age of 14 years or fails to act within 60 days after the ineligibility, death or incapacity, the conservator of the minor becomes successor custodian. If the minor has no conservator or the conservator declines to act, the transferor, the legal representative of the transferor or the custodian, an adult member of the minor's family or any other interested person may petition the court to designate a successor custodian.

So, a minor, who has reached the age of 14, may designate a new custodian, within 60 days, by executing and dating an instrument of designation before a subscribing witness other than the successor. If beyond 60 days, the minor's parent, or other person, as noted above, may petition the court to become the custodian. However, a parent does not automatically become the custodian, nor has the right to transact on a WUTMA account.

If the custodian had designated a successor custodian, at the time the custodian opened the WUTMA account, for instance, this type of issue could have been avoided.

Q4: What if a custodian wants to close out a WUTMA account with my financial institution? Do I write the check to the custodian? Do I write the check to the beneficiary?

A4: As the funds are still subject to the WUTMA provisions, it is best practice to write the check to [name of minor] by [name of adult custodian] under WUTMA. In using this language, another financial institution will know that the funds are subject to WUTMA and can accurately identify the minor beneficiary and the adult custodian.

As a resource to its members, Wisconsin Bankers Association's legal department provides information related to banking laws and regulations. For specific questions regarding WUTMA accounts, please email wbalegal@wisbank.com or call (608) 441-1200. ■

Judicial Spotlight

Wisconsin Supreme Court Enforces Jury Waiver Provision In Commercial Loan Note

In a recent case, the Wisconsin Supreme Court held that a jury waiver provision in a commercial loan note is enforceable against the borrower under Wisconsin law. According to the Supreme Court, the right of a person to waive his or her right to a jury trial is settled law under the Wisconsin Constitution. The Supreme Court also held that the bank does not need to provide proof in the case that the borrower knowingly and voluntarily

agreed to the jury waiver provision. The borrowers were seeking a jury trial in the case, and the bank took the position that the borrowers waived their right to a jury trial pursuant to the jury waiver provision in the note. The name of the case is Taft Parsons, Jr. v. Associated Banc-Corp (2017 WI 37) and the decision was released by the Court on April 13, 2017. The WBA filed a legal brief in the case in support of Associated Banc-Corp and

approval of the jury waiver provision.

This decision by the Supreme Court states a clear approval of a practice followed by some banks in Wisconsin of including jury waiver provisions in notes and other loan documents in commercial loan transactions. This decision provides reassurance to those banks which choose to include jury waiver provisions in their commercial loan documents, including the



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WBA Business Guaranty forms, that those jury waiver provisions are enforceable under Wisconsin law. Model jury waiver provisions have also been provided to banks at various WBA loan documentation workshops in the past. Based on this decision the WBA plans to review its commercial loan documents to determine whether jury waiver provisions would be

an appropriate addition to those forms going forward.

We suggest that it would be best for banks to not include jury waiver provisions in consumer credit transactions subject to the Wisconsin Consumer Act without first obtaining written DFI approval of that practice under the Wisconsin Consumer

Act. WBA intends to submit such a request for approval to DFI. ■

Regulatory Spotlight

CFPB Issues Proposed Rule to Delay Prepaid Accounts Final Rule.

The Consumer Financial Protection Bureau (CFPB) has issued a proposed rule delaying the **10/01/2017** effective date of the rule governing Prepaid Accounts under the Electronic Fund Transfer Act and the Truth in Lending Act by six months, to **04/01/2018**. Comments are due **04/05/2017**. The notice may be viewed at: <https://www.gpo.gov/fdsys/pkg/FR-2017-03-15/pdf/2017-05060.pdf>. *Federal Register*, Vol. 82, No. 49, 03/15/2017, 13782-13785.

CFPB Issues Proposed Rule Amending Regulation B.

CFPB has proposed amendments to Regulation B to permit creditors additional flexibility in complying with Regulation B in order to facilitate compliance with Regulation C, to add certain model forms and remove others from Regulation B, and to make various other amendments to Regulation B and its commentary to facilitate the collection and retention of information about the ethnicity, sex, and race of certain mortgage applicants. Comments are due **05/04/2017**. The notice may be viewed at: <https://www.gpo.gov/fdsys/pkg/FR-2017-04-04/pdf/2017-06195.pdf>. *Federal Register*, Vol. 82, No. 63, 04/04/2017, 16307-16321.

CFPB Issues Supervisory Highlights.

CFPB has issued the fourteenth edition of its Supervisory Highlights. In this issue of Supervisory Highlights, CFPB reports examination findings in the area of consumer reporting. These observations include findings from examinations at consumer reporting companies and at companies that furnish information to consumer reporting companies. The notice may be viewed at: <https://www.gpo.gov/fdsys/pkg/FR-2017-04-06/pdf/2017-06904.pdf>. *Federal Register*, Vol. 82, No. 65, 04/06/2017, 16808-16817.

CFPB Issues Notice of Assessment of Remittance Rule.

CFPB has issued a notice requesting comment on an assessment of its regulations related to consumer remittance transfers under the Electronic Fund Transfer Act (subpart B of Regulation E) in accordance with the Dodd-Frank Act. CFPB is requesting comment on its plans for assessing these regulations as well as certain recommendations and information that may be useful in conducting the planned assessment. Comments are due **05/23/2017**. The notice may be viewed at: <https://www.gpo.gov/fdsys/pkg/FR-2017-03-24/pdf/2017-05681.pdf>. *Federal Register*, Vol. 82, No. 56, 03/24/2017, 15009-15014.

FFIEC Issues Joint Report to Congress.

The Federal Financial Institutions Examination Council (FFIEC) is publishing a report entitled Joint Report to Congress, March 2017, Economic Growth and Regulatory Paperwork Reduction Act prepared by four of its constituent agencies: The Board of Governors of the Federal Reserve System (FRB), the Office of the Comptroller of the Currency (OCC), the Federal Deposit Insurance Corporation (FDIC), and the National Credit Union Association (NCUA). The notice may be viewed at: <https://www.gpo.gov/fdsys/pkg/FR-2017-03-30/pdf/2017-06131.pdf>. *Federal Register*, Vol. 82, No. 60, 03/30/2017, 15900-15979.

FFIEC Suspends Comment Period for Proposed Revised Policy Statements.

FFIEC has suspended the public comment period for the Proposed Revised Policy Statements as of **04/04/2017**. The comment period was scheduled to close on **04/10/2017**. The suspension of the comment period will allow the President's appointees the opportunity to review and consider this action. The notice may be viewed at: <https://www.gpo.gov/fdsys/pkg/FR-2017-04-04/pdf/2017-06596.pdf>. *Federal Register*, Vol. 82, No. 63, 04/04/2017, 16399.



Regulatory Spotlight

FDIC Requests Comment on Company-Run Annual Stress Test Reporting Template and Documentation.

The Federal Deposit Insurance Corporation (FDIC) has issued a notice to announce it is seeking comment on an information collection titled Company-Run Annual Stress Test Reporting Template and Documentation for Covered Institutions with Total Consolidated Assets of \$50 Billion or More under the Dodd-Frank Act. FDIC is also giving notice that it has sent the amendment to OMB for review. Comments are due **04/21/2017**. The notice may be viewed at: <https://www.gpo.gov/fdsys/pkg/FR-2017-03-22/pdf/2017-05688.pdf>. *Federal Register*, Vol. 82, No. 54, 03/22/2017, 14726-14728.

FDIC Issues Notices of Terminations of Receiverships.

- FDIC has issued a notice to announce it intends to terminate the receivership of Evergreen State Bank, Stoughton, **Wisconsin**. FDIC was appointed receiver of Evergreen State Bank on **01/28/2011**. The liquidation of the receivership assets has been completed. To the extent permitted by available funds and in accordance with law, the Receiver will be making a final dividend payment to proven creditors. The Receiver has determined that the continued existence of the receivership will serve no useful purpose. Consequently, notice is given that the receivership shall be terminated, to be effective no sooner than thirty days after the date of the notice. If any person wishes to comment concerning the termination of the receivership, such comment must be made in writing and sent within thirty days of the date of the notice to: Federal Deposit Insurance Corporation, Division of Reso-

lutions and Receiverships, Attention: Receivership Oversight Department 32.1, 1601 Bryan Street, Dallas, TX 75201. No comments concerning the termination of this receivership will be considered which are not sent within this timeframe. The notice may be viewed at: <https://www.gpo.gov/fdsys/pkg/FR-2017-03-22/pdf/2017-05612.pdf>. *Federal Register*, Vol. 82, No. 54, 03/22/2017, 14726.

- FDIC has issued a notice to announce it intends to terminate the receivership of Citizens First National Bank, Princeton, **Illinois**. FDIC was appointed receiver of Citizens First National Bank on **11/02/2012**. The liquidation of the receivership assets has been completed. To the extent permitted by available funds and in accordance with law, the Receiver will be making a final dividend payment to proven creditors. The Receiver has determined that the continued existence of the receivership will serve no useful purpose. Consequently, notice is given that the receivership shall be terminated, to be effective no sooner than thirty days after the date of the notice. If any person wishes to comment concerning the termination of the receivership, such comment must be made in writing and sent within thirty days of the date of the notice to: Federal Deposit Insurance Corporation, Division of Resolutions and Receiverships, Attention: Receivership Oversight Department 32.1, 1601 Bryan Street, Dallas, TX 75201. No comments concerning the termination of this receivership will be considered which are not sent within this timeframe. The notice may be viewed at: <https://www.gpo.gov/fdsys/pkg/FR-2017-03-22/pdf/2017-05612.pdf>. *Federal Register*, Vol. 82, No. 54, 03/22/2017, 14726.

HUD Issues Notice of Administrative Actions.

The Department of Housing and Urban Development (HUD) has issued a notice advising of the cause and description of administrative actions taken by HUD's Mortgagee Review Board against HUD-approved mortgagees. The notice may be viewed at: <https://www.gpo.gov/fdsys/pkg/FR-2017-04-04/pdf/2017-06642.pdf>. *Federal Register*, Vol. 82, No. 63, 04/04/2017, 16408-16414.

HUD Issues Notice of Regulatory Waiver Requests Granted for 2016 Fourth Quarter.

HUD has issued a notice of regulatory waiver requests granted for the fourth quarter of calendar year 2016. HUD is required to publish quarterly *Federal Register* notices of all approved regulatory waivers. The notice contains a list of regulatory waivers granted by HUD during the period beginning **10/01/2016**, and ending **12/31/2016**. The notice may be viewed at: <https://www.gpo.gov/fdsys/pkg/FR-2017-03-29/pdf/2017-06198.pdf>. *Federal Register*, Vol. 82, No. 59, 03/29/2017, 15532-15539.

FEMA Requests Comment on National Flood Insurance Program Claims Forms.

The Federal Emergency Management Agency (FEMA) has issued a notice to announce it is seeking comment on an information collection titled National Flood Insurance Program Claims Forms. FEMA is also giving notice that it has sent the amendment to OMB for review. Comments are due **04/26/2017**. The notice may be viewed at: <https://www.gpo.gov/fdsys/pkg/FR-2017-03-27/pdf/2017-05997.pdf>. *Federal Register*, Vol. 82, No. 57, 03/27/2017, 15231-15232.



Regulatory Spotlight

FEMA Issues Final Flood Elevation Determinations.

FEMA has made final Base (1-percent-annual-chance) Flood Elevations (BFEs) and modified BFEs for communities in the state of **Illinois**. The BFEs and modified BFEs are the basis for the floodplain management measures that each community is required either to adopt or to show evidence of being already in effect in order to qualify or remain qualified for participation in the National Flood Insurance Program (NFIP). The effective date is the date of issuance of the Flood Insurance Rate Map (FIRM) showing BFEs and modified BFEs for each community. This date may be obtained by contacting the office where the maps are available for inspection as indicated in the table in the final rule. The final rule may be viewed at: <https://www.gpo.gov/fdsys/pkg/FR-2017-03-20/pdf/2017-05452.pdf>. *Federal Register*, Vol. 82, No. 52, 03/20/2017, 14334-14336.

FEMA Issues Final Flood Hazard Determinations.

- FEMA has issued a final notice which identifies communities in the states of **Illinois**, and **Iowa**, where flood hazard determinations, which may include additions or modifications of Base Flood Elevations (BFEs), base flood depths, Special Flood Hazard Area (SFHA) boundaries or zone designations, or regulatory floodways on the Flood Insurance Rate Maps (FIRMs) and where applicable, in the supporting Flood Insurance Study (FIS) reports have been made final. The FIRM and FIS report are the basis of the floodplain management measures that a community is required either to adopt or to show evidence of having in effect in order to qualify or remain qualified for participation in FEMA's

National Flood Insurance Program (NFIP). The final notice is effective **06/07/2017**. The notice may be viewed at: <https://www.gpo.gov/fdsys/pkg/FR-2017-03-13/pdf/2017-04885.pdf>. *Federal Register*, Vol. 82, No. 47, 03/13/2017, 13472.

- FEMA has issued a final notice which identifies communities in the state of **Iowa**, where flood hazard determinations, which may include additions or modifications of Base Flood Elevations (BFEs), base flood depths, Special Flood Hazard Area (SFHA) boundaries or zone designations, or regulatory floodways on the Flood Insurance Rate Maps (FIRMs) and where applicable, in the supporting Flood Insurance Study (FIS) reports have been made final. The FIRM and FIS report are the basis of the floodplain management measures that a community is required either to adopt or to show evidence of having in effect in order to qualify or remain qualified for participation in FEMA's National Flood Insurance Program (NFIP). The final notice is effective **05/16/2017**. The notice may be viewed at: <https://www.gpo.gov/fdsys/pkg/FR-2017-03-20/pdf/2017-05451.pdf>. *Federal Register*, Vol. 82, No. 52, 03/20/2017, 14379-14381.

FEMA Issues Final Rules on Suspension of NFIP Community Eligibility.

FEMA has issued a final rule which identifies communities in the state of **Iowa**, where the sale of flood insurance has been authorized under the National Flood Insurance Program (NFIP) that are scheduled for suspension on the effective dates listed within the final rule because of noncompliance with the floodplain management

requirements of the program. If FEMA receives documentation that the community has adopted the required floodplain management measures prior to the effective suspension date given in the final rule, the suspension will not occur and a notice of this will be provided by publication in the *Federal Register* on a subsequent date. The effective date of each community's scheduled suspension is the third date listed in the third column of the tables in the final rule. The final rule may be viewed at: <https://www.gpo.gov/fdsys/pkg/FR-2017-04-03/pdf/2017-06426.pdf>. *Federal Register*, Vol. 82, No. 62, 04/03/2017, 16122-16124.

FEMA Issues Final Notices of Changes in Flood Hazard Determinations.

- FEMA has issued new or modified Base (1% annual-chance) Flood Elevations (BFEs), base flood depths, Special Flood Hazard Area (SFHA) boundaries or zone designations, and/or regulatory floodways (hereinafter referred to as flood hazard determinations) as shown on the indicated Letter of Map Revision (LOMR) for communities in the states of **Illinois**, **Iowa**, **Michigan**, and **Wisconsin**. Each LOMR revises the Flood Insurance Rate Maps (FIRMs), and in some cases the Flood Insurance Study (FIS) reports, currently in effect for the listed communities. The flood hazard determinations modified by each LOMR will be used to calculate flood insurance premium rates for new buildings and their contents. The effective date for each LOMR is indicated in the table in the final notice. The notice may be viewed at: <https://www.gpo.gov/fdsys/pkg/FR-2017-03-13/pdf/2017-04897.pdf>. *Federal Register*, Vol. 82, No. 47, 03/13/2017, 13479-13482.



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- FEMA has issued new or modified Base (1% annual-chance) Flood Elevations (BFEs), base flood depths, Special Flood Hazard Area (SFHA) boundaries or zone designations, and/or regulatory floodways (hereinafter referred to as flood hazard determinations) as shown on the indicated Letter of Map Revision (LOMR) for communities in the states **Illinois**, **Minnesota**, and **Wisconsin**. Each LOMR revises the Flood Insurance Rate Maps (FIRMs), and in some cases the Flood Insurance Study (FIS) reports, currently in effect for the listed communities. The flood hazard determinations modified by each LOMR will be used to calculate flood insurance premium rates for new buildings and their contents. The effective date for each LOMR is indicated in the table in the final notice. The notice may be viewed at: <https://www.gpo.gov/fdsys/pkg/FR-2017-03-16/pdf/2017-04884.pdf>. *Federal Register*, Vol. 82, No. 50, 03/16/2017, 14023-14028.
 - FEMA has issued new or modified Base (1% annual-chance) Flood Elevations (BFEs), base flood depths, Special Flood Hazard Area (SFHA) boundaries or zone designations, and/or regulatory floodways (hereinafter referred to as flood hazard determinations) as shown on the indicated Letter of Map Revision (LOMR) for communities in the states of **Illinois**, and **Wisconsin**. Each LOMR revises the Flood Insurance Rate Maps (FIRMs), and in some cases the Flood Insurance Study (FIS) reports, currently in effect for the listed communities. The flood hazard determinations modified by each LOMR will be used to calculate flood insurance premium rates for new buildings and their contents. The effective date for each LOMR is indicated in the table in the final notice. The notice may be viewed at: <https://www.gpo.gov/fdsys/pkg/FR-2017-03-20/pdf/2017-05450.pdf>. *Federal Register*, Vol. 82, No. 52, 03/20/2017, 14374-14378.
 - FEMA has issued new or modified Base (1% annual-chance) Flood Elevations (BFEs), base flood depths, Special Flood Hazard Area (SFHA) boundaries or zone designations, and/or regulatory floodways (hereinafter referred to as flood hazard determinations) as shown on the indicated Letter of Map Revision (LOMR) for communities in the states of **Illinois**, and **Wisconsin**. Each LOMR revises the Flood Insurance Rate Maps (FIRMs), and in some cases the Flood Insurance Study (FIS) reports, currently in effect for the listed communities. The flood hazard determinations modified by each LOMR will be used to calculate flood insurance premium rates for new buildings and their contents. The effective date for each LOMR is indicated in the table in the final notice. The notice may be viewed at: <https://www.gpo.gov/fdsys/pkg/FR-2017-04-05/pdf/2017-06678.pdf>. *Federal Register*, Vol. 82, No. 64, 04/05/2017, 16608-16610.
 - FEMA has issued new or modified Base (1% annual-chance) Flood Elevations (BFEs), base flood depths, Special Flood Hazard Area (SFHA) boundaries or zone designations, and/or regulatory floodways (hereinafter referred to as flood hazard determinations) as shown on the indicated Letter of Map Revision (LOMR) for communities in the states of **Michigan**, **Minnesota**, and **Wisconsin**. Each LOMR revises the Flood Insurance Rate Maps (FIRMs), and in some cases the Flood Insurance Study (FIS) reports, currently in effect for the listed communities. The flood hazard determinations modified by each LOMR will be used to calculate flood insurance premium rates for new buildings and their contents. The effective date for each LOMR is indicated in the table in the final notice. The notice may be viewed at: <https://www.gpo.gov/fdsys/pkg/FR-2017-04-05/pdf/2017-06676.pdf>. *Federal Register*, Vol. 82, No. 64, 04/05/2017, 16605-16607.
 - FEMA has issued new or modified Base (1% annual-chance) Flood Elevations (BFEs), base flood depths, Special Flood Hazard Area (SFHA) boundaries or zone designations, and/or regulatory floodways (hereinafter referred to as flood hazard determinations) as shown on the indicated Letter of Map Revision (LOMR) for communities in the states of **Illinois**, **Iowa**, **Minnesota**, and **Wisconsin**. Each LOMR revises the Flood Insurance Rate Maps (FIRMs), and in some cases the Flood Insurance Study (FIS) reports, currently in effect for the listed communities. The flood hazard determinations modified by each LOMR will be used to calculate flood insurance premium rates for new buildings and their contents. The effective date for each LOMR is indicated in the table in the final notice. The notice may be viewed at: <https://www.gpo.gov/fdsys/pkg/FR-2017-04-05/pdf/2017-06676.pdf>. *Federal Register*, Vol. 82, No. 64, 04/05/2017, 16605-16607.
- ### OFAC Makes Changes to Lists.
- The Office of Foreign Assets Control (OFAC) has amended its lists of Specially Designated Global Terrorists, Specially Designated Nationals and Blocked Persons, and Specially Designated Narcotics Trafficker Kingpins. The documents listing these changes may be viewed at: www.treas.gov/offices/enforcement/ofac/actions.
- ### Treasury Issues Notice on Qualified Financial Contracts Recordkeeping Related to Orderly Liquidation Authority.
- The Department of the Treasury (Treasury) has issued a notification providing the means by which records entities and top-tier financial companies may submit the required point of contact information in connection with the qualified financial contract recordkeeping requirements of the Dodd-Frank Act. Records entities and top-tier financial companies may provide such point of contact information to each of the following primary financial regulatory agencies by email: Board of Governors of the Federal Reserve System, QFC-Record@frb.gov; Commodity Futures Trading Commission, qfccontact@cftc.gov; Federal Deposit Insurance Cor-



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poration, Part148QFC@fdic.gov; and Securities and Exchange Commission, QFCContakt@sec.gov. The final rule may be viewed at: <https://www.gpo.gov/fdsys/pkg/FR-2017-03-30/pdf/2017-06288.pdf>. *Federal Register*, Vol. 82, No. 60, 03/30/2017, 15630.

FHFA Issues Final Rule on Minority and Women Outreach Program.

The Federal Housing Finance Agency (FHFA) is issuing a final rule to establish its minority and women outreach program pursuant to the Financial Institutions Reform, Recovery, and Enforcement Act of 1989; the Federal Housing Enterprises Financial Safety and Soundness Act of 1992; and the Dodd-Frank Act. The final rule also redesignates the current Minority and Women Inclusion regulation in the Code of Federal Regulations to subchapter B of FHFA's regulations. The final rule is effective **03/24/2017**. The final rule may be viewed at: <https://www.gpo.gov/fdsys/pkg/FR-2017-03-24/pdf/2017-05894.pdf>. *Federal Register*, Vol. 82, No. 56, 03/24/2017, 14992-14995.

SBA Issues Peg Rate.

The Small Business Administration (SBA) publishes an interest rate called the optional peg rate on a quarterly basis. The rate is a weighted average cost of money to the government for maturities similar to the average SBA direct loan. The rate may be used as a base rate for guaranteed fluctuating interest rate SBA loans. The rate will be **2.625** percent for the April-June quarter of FY 2017. Pursuant to 13 CFR 120.921(b), the maximum legal interest rate for any third party lender's commercial loan which funds any portion of the cost of a 504 project shall be 6 percent over the New York Prime rate or, if that exceeds the maximum interest rate

permitted by the constitution or laws of a given state, the maximum interest rate will be the rate permitted by the constitution or laws of the given state. The notice may be viewed at: <https://www.gpo.gov/fdsys/pkg/FR-2017-04-03/pdf/2017-06452.pdf>. *Federal Register*, Vol. 82, No. 62, 04/03/2017, 16269.

SBA Requests Comment on Information Collections.

- SBA has issued a notice to announce it is seeking comment on an information collection titled Community Advantage Lender Participation Application. SBA is also giving notice that it has sent the amendment to OMB for review. Comments are due **05/01/2017**. The notice may be viewed at: <https://www.gpo.gov/fdsys/pkg/FR-2017-03-31/pdf/2017-06358.pdf>. *Federal Register*, Vol. 82, No. 61, 03/31/2017, 16086.
- SBA has issued a notice to announce it is seeking comment on an information collection titled Entrepreneurial Development Customer Intake Form & Training Report Form. SBA is also giving notice that it has sent the amendment to OMB for review. Comments are due **06/02/2017**. The notice may be viewed at: <https://www.gpo.gov/fdsys/pkg/FR-2017-04-03/pdf/2017-06456.pdf>. *Federal Register*, Vol. 82, No. 62, 04/03/2017, 16268-16269.
- SBA has issued a notice to announce it is seeking comment on an information collection titled Financing Eligibility Statement—Social Disadvantage/ Economic Disadvantage. SBA is also giving notice that it has sent the amendment to OMB for review. Comments are

due **05/04/2017**. The notice may be viewed at: <https://www.gpo.gov/fdsys/pkg/FR-2017-04-04/pdf/2017-06635.pdf>. *Federal Register*, Vol. 82, No. 63, 04/04/2017, 16466.

FSA Requests Comment on Information Collections.

- The Farm Service Agency (FSA) has issued a notice to announce it is seeking comment on an information collection titled Customer Data Worksheet Request for Business Partner Record Changes. FSA is also giving notice that it has sent the amendment to OMB for review. Comments are due **05/30/2017**. The notice may be viewed at: <https://www.gpo.gov/fdsys/pkg/FR-2017-03-29/pdf/2017-06144.pdf>. *Federal Register*, Vol. 82, No. 59, 03/29/2017, 15481.
- FSA has issued a notice to announce it is seeking comment on an information collection titled Generic Clearance for the Collection of Qualitative Customer Feedback on Farm Service Agency Service Delivery. FSA is also giving notice that it has sent the amendment to OMB for review. Comments are due **06/05/2017**. The notice may be viewed at: <https://www.gpo.gov/fdsys/pkg/FR-2017-04-04/pdf/2017-06594.pdf>. *Federal Register*, Vol. 82, No. 63 04/04/2017, 16338-16339.

RBC Invites Applications for Rural Cooperative Development Grants.

The Rural Business-Cooperative Service (RBC) has announced that it is accepting fiscal year (FY) 2017 applications for the Rural Cooperative Development Grant (RCDG) program. The purpose of announcing the RCDG program prior to the enactment of full year appropriations



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is to provide applicants sufficient time to prepare and submit their applications in response to this solicitation and to provide RBC time to process applications within FY 2017. Expenses incurred in developing applications will be at the applicant's risk. The purpose of the program is to provide financial assistance to improve the economic condition of rural areas through cooperative development. Eligible applicants include a non-profit corporation or an institution of higher education. Completed applications are due **06/02/2017**. The notice may be viewed at: <https://www.gpo.gov/fdsys/pkg/FR-2017-03-22/pdf/2017-05600.pdf>. *Federal Register*, Vol. 82, No. 54, 03/22/2017, 14680-14688.

CCC Amends Final Rule on Farm Storage Facility Loan Program.

The Commodity Credit Corporation has amended its final rule on the Farm Storage Facility Loan Program to reinsert a missing word. The amendment is effective **04/03/2017**. The amendment may be viewed at: <https://www.gpo.gov/fdsys/pkg/FR-2017-04-03/pdf/2017-06449.pdf>. *Federal Register*, Vol. 82, No. 62, 04/03/2017, 16101.

CFTC Requests Comment on Procedural Requirements for Requests for Interpretative, No-Action and Exemptive Letters

The Commodity Futures Trading Commission (CFTC) has issued a notice to announce it is seeking comment on an information collection titled Procedural Requirements for Requests for Interpretative, No-Action and Exemptive Letters. Comments are due **05/30/2017**. The notice may be viewed at: <https://www.gpo.gov/fdsys/pkg/FR-2017-03-29/pdf/2017-06182.pdf>. *Federal Register*, Vol. 82, No. 59, 03/29/2017, 15514-15516.

SEC Finalizes Rule Requiring Exhibit Hyperlinks and HTML Format.

The Securities and Exchange Commission (SEC) has adopted amendments that will require registrants that file registration statements and reports subject to the exhibit requirements under Item 601 of Regulation S-K, or that file Forms F-10 or 20-F, to include a hyperlink to each exhibit listed in the exhibit index of these filings. To enable the inclusion of such hyperlinks, the amendments also require that registrants submit all such filings in HTML format. The final rule is effective **09/01/2017**. The notice may be viewed at: <https://www.gpo.gov/fdsys/pkg/FR-2017-03-17/pdf/2017-04365.pdf>. *Federal Register*, Vol. 82, No. 51, 03/17/2017, 14130-14143.

SEC Finalizes Rule on Securities Transaction Settlement Cycle.

SEC has adopted an amendment to the Settlement Cycle Rule under the Securities Exchange Act of 1934 to shorten the standard settlement cycle for most broker-dealer transactions from three business days after the trade date to two business days after the trade date. The final rule is effective **5/30/2017**, and compliance is mandatory on **09/05/2017**. The notice may be viewed at: <https://www.gpo.gov/fdsys/pkg/FR-2017-03-29/pdf/2017-06037.pdf>. *Federal Register*, Vol. 82, No. 59, 03/29/2017, 15564-15601.

SEC Finalizes Rule Updating EDGAR Filer Manual.

SEC has adopted revisions to the Electronic Data Gathering, Analysis, and Retrieval System (EDGAR) Filer Manual and related rules to reflect updates to the EDGAR system. The updates are being made primarily to support the new online version of the Transfer Agent submission form types;

provide for the ability for filers to submit duplicate filings for submission form type 10-D; and provide for the ability for filers to upload the notarized authentication document and the power of attorney as separate CORRESP documents when submitting a request to manually update their EDGAR filing passphrase. The final rule is effective **03/31/2017**. The final rule may be viewed at: <https://www.gpo.gov/fdsys/pkg/FR-2017-03-31/pdf/2017-06290.pdf>. *Federal Register*, Vol. 82, No. 61, 03/31/2017, 15993-15995.

SEC Issues Proposed Rule to Require Inline XBRL Filing of Tagged Data.

SEC has issued a proposed rule to require the use of the Inline XBRL format for the submission of operating company financial statement information and mutual fund risk/return summaries. The proposed amendments are intended to improve the data's quality, benefiting investors, other market participants, and other data users, and to decrease, over time, the cost of preparing the data for submission to SEC. The proposed amendments would also eliminate the requirement for filers to post Interactive Data Files on their websites and terminate SEC's voluntary program for the submission of financial statement information interactive data that is currently available only to investment companies and certain other entities. Comments are due **05/16/2017**. The notice may be viewed at: <https://www.gpo.gov/fdsys/pkg/FR-2017-03-17/pdf/2017-04366.pdf>. *Federal Register*, Vol. 82, No. 51, 03/17/2017, 14282-14311.

SEC Issues Proposed Amendments to the Municipal Securities Disclosure Rule.

SEC has issued a notice requesting comment on proposed amendments to the Mu-



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municipal Securities Disclosure Rule under the Securities Exchange Act of 1934 that would amend the list of event notices that a broker, dealer, or municipal securities dealer acting as an underwriter in a primary offering of municipal securities must reasonably determine that an issuer or an obligated person has undertaken, in a written agreement or contract for the benefit of holders of the municipal securities, to provide to the Municipal Securities Rulemaking Board. Comments are due **05/15/2017**.

The notice may be viewed at: <https://www.gpo.gov/fdsys/pkg/FR-2017-03-15/pdf/2017-04323.pdf>. *Federal Register*, Vol. 82, No. 49, 03/15/2017, 13928-13957.

CDFI Requests Comment on Annual Certification and Data Collection Report Form.

The Community Development Financial Institutions Fund (CDFI) has issued a notice to announce it is seeking comment on an information collection titled Annual

Certification and Data Collection Report Form. CDFI is also giving notice that it has sent the collection to OMB for review. Comments are due **05/22/2017**. The notice may be viewed at: <https://www.gpo.gov/fdsys/pkg/FR-2017-03-23/pdf/2017-05811.pdf>. *Federal Register*, Vol. 82, No. 55, 03/23/2017, 14941. ■

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▲ NCUA has issued a warning to alert consumers to be on guard for fake check scams; the NCUA has received numerous inquiries on the subject from consumers. Malicious parties have their victims deposit a cashier's check, money order, or other checking instrument from an unknown person and then transfer or wire the funds to the scammer. It could take a considerable amount of time for a check to be discovered as fraudulent, which could be too late, once a victim sends funds from a fraudulent check, he or she may be responsible for reimbursing the financial institution for those funds. The full warning and resources for victims may be viewed at: <https://www.ncua.gov/newsroom/Pages/news-2017-april-check-scams.aspx>.

▲ FRB has released its semiannual update to the Bank Holding Company Supervision Manual. The manual may be viewed in full or by section at: https://www.federalreserve.gov/publications/supervision_bhc.htm.

▲ OCC has released the National Bank Director Waivers booklet of the

Comptroller's Licensing Manual, replacing the March 2008 booklet titled Director Waivers. This booklet summarizes the national bank director qualifications required by 12 USC 72, and outlines the application process for a national bank to request the OCC to waive the requirements, as applicable. The booklet may be viewed at: <https://www.occ.gov/publications/publications-by-type/licensing-manuals/dirwaiv.pdf>.

▲ FRFS has issued the April 2017 issue of *FedFocus*, featuring articles on ISO 20022 adoption, FedCash education programs, and the role of the Federal Reserve during tax season. The *FedFocus* may be found at: <https://www.frbsecurities.org/fedfocus/index.html>.

▲ FDIC has released a new resource for community banks titled Affordable Mortgage Lending Guide, Part III. The guide explains programs and products offered by FHLBs for facilitating mortgage lending, giving general information about the Affordable Housing Program and the Community Investment Program, Advances, the Mortgage Purchase Program,

and the Mortgage Partnership Finance Program. The three parts of the guide can be downloaded at: <https://www.fdic.gov/consumers/community/mortgagelending/guide.html>.

▲ FRB has released a notice stating that Sept. 15, 2017, when Same Day ACH Phase 2 is implemented, the industry can count on the U.S. Treasury's participation in Same Day ACH. Subject to the anticipated publication of a final 31 CFR Part 210 rule, the Treasury is operationally committed to participating in Same Day ACH as of Sept. 15, 2017, beginning with the capability to receive tax and non-tax Same Day ACH credits. With respect to origination of Same Day ACH, Treasury will have this capability no later than October for Electronic Federal Tax Payment System (EFTPS) debits. Other Treasury programs will be adopting the capability later in the year and into 2018. ACH origination software vendors and third-party processors providing financial institution ACH origination services need to know that federal government routing transit numbers are expected to be operational to support Same Day ACH credit receipt as



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of Sept. 15, 2017. The statement may be viewed at: <https://www.frb.services.org/files/communications/pdf/fedach/040717-same-day-ach.pdf>.

▲ FinCEN has issued Advisory FIN-2017-A002 on FATF's update of its list of jurisdictions with strategic AML/CFT deficiencies. The changes may affect financial institutions' obligations and risk-based approaches with respect to relevant jurisdictions. The full advisory may be viewed at: <https://www.fincen.gov/sites/default/files/advisory/2017-04-05/FinCEN%20FATF%20Advisory%20%28February%202017%29.pdf>.

▲ FDIC has released a notice concerning the implementation of a streamlined FFIEC Call Report for eligible small institutions and burden-reducing changes to the existing FFIEC 031 and FFIEC 041 versions of the Call Report this quarter. For purposes of the new FFIEC 051 Call Report, "eligible small institutions" are institutions with domestic offices only and total assets of less than \$1 billion, excluding those that are advanced approaches institutions for regulatory capital purposes. Each institution must file its March 31, 2017, Call Report data in one of two ways: by using computer software to prepare and edit its report data and then electronically submitting the data directly to the CDR or by completing its report in paper form and arranging with a software vendor or another party to convert its paper report into the electronic format that can be processed by the CDR. The software vendor or other party then must electronically submit the institution's Call Report data file to the CDR. The full notice may be viewed at: <https://www.fdic.gov/news/news/financial/2017/fil17014.html>.

▲ OCC has issued the Retail Lending booklet of the *Comptroller's Hand-*

book which discusses the risks associated with retail lending and provides a framework for evaluating retail credit risk management activities. This booklet supplements the core assessment sections of the "Large Bank Supervision," "Community Bank Supervision," and "Federal Branches and Agency Supervision" booklets of the Comptroller's Handbook. The full booklet may be viewed at: <https://www.occ.gov/publications/publications-by-type/comptrollers-handbook/file-pub-ch-a-rl.pdf>.

▲ CFPB has released the 2016 Consumer Response Annual Report, detailing the number and nature of consumer complaints received by CFPB throughout 2016, as well as the process by which they handle said complaints. An approximate total of 291,400 complaints were handled, 73 percent of which were submitted through the CFPB's website. CFPB has had a steady increase in complaint volume, with a 7 percent increase from 2015 to 2016, debt collection, credit reporting, and mortgage remained the top 3 topics of consumer complaint by volume. The full report may be viewed at: https://s3.amazonaws.com/files.consumerfinance.gov/f/documents/201703_cfpb_Consumer-Response-Annual-Report-2016.PDF.

▲ FRB has released the March 2017 G.5 Foreign Exchange Rates report which shows the average rates of exchange for March with comparable figures for other months. The report may be viewed at: <https://www.federalreserve.gov/releases/g5/current/default.htm>.

▲ FDIC, in recognition of National Financial Capability Month, has issued a release to highlight the financial education tools it has developed to help people of all ages build their financial knowledge and skills. These resources include Money Smart for Young People, Money Smart for

Adults, and Money Smart for Older Adults in nine different languages, Money Smart for Small Business, and a Teacher Online Resource Center. The release with a link to the resources may be viewed at: <https://www.fdic.gov/news/news/press/2017/pr17027.html>.

▲ OCC has issued Alert 2017-4, titled *Fictitious Notification Regarding the Release of Funds Supposedly Under the Control of the Office of the Comptroller of the Currency*. There have been reports of consumers receiving emails claiming to be from the OCC regarding funds supposedly under OCC control, any communication claiming such is false. The OCC does not participate in the transfer of funds for, or on behalf of, individuals, business enterprises, or governmental entities. Potential victims have received communications stating that the OCC is holding 25 million euros related to an international funds transfer until a "Capital Currency Control Permit" fee of 25,000 euros is paid, the communications include an "Application for Capital Currency Control Permit," which requests a copy of the individual's passport, bank account information, and other data. Always be cautious when divulging personal information. The full release and information for victims may be viewed at: <https://www.occ.gov/news-issuances/alerts/2017/alert-2017-4.html>.

▲ FHFA has released the 2016 Scorecard Progress Report for Fannie Mae and Freddie Mac, summarizing the actions taken to achieve the FHFA's three strategic goals as conservator of the Enterprises. The goals are to maintain foreclosure prevention activities and credit availability for new and refinanced mortgages, reduce taxpayer risk, and build a new single-family securitization infrastructure for use by the Enterprises and adaptable for use by other participants in the secondary market



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in the future. The report may be viewed at: <https://www.fhfa.gov/AboutUs/Reports/ReportDocuments/2016-Scorecard-Progress-Report.pdf>.

▲ FDIC released a report on its Youth Savings Pilot program which aims to identify promising approaches to combining financial education with the opening of safe, low-cost savings accounts for school-aged children. The program was carried out by 21 banks in geographically diverse locations in the United States, and followed three different models, outlined in the report, for educating students and involving them in creating a savings account. Amongst its findings, the program found there to be great advantage in improving a child's financial future through financial education and banking access, and banks benefit from building trust with the community and investing in future customers. The report may be viewed at: <https://www.fdic.gov/consumers/assistance/protection/depaccounts/youthsavings/documents/lessons-from-the-fdic-pilot.pdf>.

▲ CFPB has released its monthly Complaint Report for March 2017, highlighting credit card complaints. Credit cards are the fourth most-complained-about product by consumers, representing 10 percent of total complaints, with billing disputes being the top credit card issue. The report may be viewed at: http://files.consumerfinance.gov/f/documents/201703_cfpb_Monthly-Complaint-Report.pdf.

▲ FATF released a statement concerning jurisdictions with strategic deficiencies in their anti money laundering and combating the financing of terrorism (AML/CFT) regimes. The Democratic People's Republic of Korea (DPRK) continues to have significant deficiencies in its AML/CFT standards, FAFT urges all ju-

risdictions to apply counter-measures and targeted financial sanctions to combat the threat DPRK poses to the integrity of the international financial system. The statement also addresses Iran's adoption of an Action Plan aimed at addressing its strategic AML/CFT deficiencies. The statement may be viewed at: <http://www.fatf-gafi.org/publications/high-riskandnon-cooperativejurisdictions/documents/public-statement-february-2017.html>.

▲ FAFT released a statement concerning progress made in improving global AML/CFT standards. Several jurisdictions identified to have AML/CFT deficiencies have provided a written high-level political commitment to address the specific deficiencies of the jurisdiction, these jurisdictions are Afghanistan, Bosnia and Herzegovina, Ethiopia, Iraq, Lao PDR, Syria, Uganda, Vanuatu, and Yemen. FATF will closely monitor the implementation of these action plans. The statement with details on each nation's plan may be viewed at: <http://www.fatf-gafi.org/publications/high-riskandnon-cooperativejurisdictions/documents/fatf-compliance-february-2017.html>.

▲ CFPB has ordered Experian to truthfully represent how its credit scores are used, and pay a civil penalty of \$3 Million for deceptive marketing falsely claiming the credit scores it marketed and provided to consumers were used by lenders to make credit decisions. Experian also violated the Fair Credit Reporting Act, which requires a credit reporting company to provide a free credit report once every twelve months and to operate a central source where consumers can obtain their report. The full release may be viewed at: <https://www.consumerfinance.gov/about-us/newsroom/cfpb-fines-experian-3-million-deceiving-consumers-marketing-credit-scores/>.

▲ FRB's US Currency Education Program has designed two new materials to help individuals become familiar with the security and design features of Federal Reserve notes. *Dollars in Detail* is an in-depth technical brochure on the security features of current US currency, and *Know the \$20* is a quick reference for the security features in the \$20 note in the form of a tent card, both materials are available in English and Spanish. The materials are available for download at: https://www.uscurrency.gov/resources/download-materials?utm_source=partner-newsletter&utm_campaign=TO-1&utm_medium=partner&utm_term=downloads&utm_content=text-link.

▲ The Federal Reserve Bank of Philadelphia's Research Department has released the working paper "How Data Breaches Affect Consumer Credit." The paper examines the 2012 South Carolina Department of Revenue data breach to study how data breaches and news coverage on such affect consumers' interaction with the credit market and their use of credit. Findings include an increase in fraud protection services were acquired by consumers following the breach and notification from the government, but the majority of consumers did not react to the breach, suggesting a strengthening of data security to be more efficient in reducing the likelihood of identity theft. The paper may be viewed at: <https://www.philadelphiafed.org/-/media/research-and-data/publications/working-papers/2017/wp17-06.pdf?la=en>. ■



Compliance Calendar

April 2017 – September 2017

Advocacy

WBA Capitol Day
May 10 | Madison

Boot Camps

Lending Boot Camp
May 15 | Wisconsin Dells

WBA Supervisors Boot Camp
Sept. 19-20 | Wisconsin Dells

Conferences

WBA Human Resources
Conference
May 16 | Wisconsin Dells

WBA BSA/AML Conference
May 22-23 | Wisconsin Dells

WBA 2017 Management
Conference & Expo
Sept. 12-13 | Wisconsin Dells

FIPCO Events

Threat Intelligence Briefings
May 18 | Wisconsin Rapids
June 15 | Madison

FIPCO Compliance & Software
Forum – Deposit
May 11 | Stevens Point

Compliance Concierge
Loan (Front-End) Training
May 15-18 | Madison

(Visit www.fipco.com/events.)

Schools

WBA Compliance
Officer School
May 2-4 | Wisconsin Dells

WBA School of Bank
Management
May 7-12 | Madison

WBA Agricultural
Lending School
Aug. 2-4 | Wausau/Rothschild

Peer Group Meetings

WBA BOLT Peer Group Meetings
May 3 | Appleton
May 3 | West Bend
May 4 | Rice Lake

Summits

WBA/WACHA's Executive
Payments Summit
May 3 | Wisconsin Dells

WBA Bank Directors Summit
May 24 | Eau Claire
May 25 | Stevens Point

WBA BOLT Summer
Leadership Summit
June 12 | Wisconsin Dells

Webinars (online training)

BSA Compliance Hotspots:
Regulators, Litigation, Policies &
Procedures Webinar
April 25 | 2:00 p.m.

Credit Card
Compliance Webinar
April 27 | 1:30 p.m.

Opening Accounts for Nonprofits
and Charities Webinar
May 2 | 10 a.m.-Noon

Revisiting TRID Line-by-Line
Part 1: Loan Estimate Webinar
May 2 | 2-3:30 p.m.

Understanding Commercial
Loan Documents Webinar
May 3 | 1:30-3:30 p.m.

Coaching Tellers to
Excellence Webinar
May 4 | 1:30-3:30 p.m.

Fair Lending Hot Topics in 2017
What's on the Horizon? Webinar
May 9 | 1:30-3:30 p.m.

Surviving an FFIEC IT
Security Exam Webinar
May 10 | 2-3:30 p.m.

Escrow Account Compliance
Webinar
May 18 | 10:00 a.m.

WBA's social media efforts focus on communication, advocacy:

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www.linkedin.com/company/wisconsin-bankers-association

> Watch Us



Wisconsin Bankers
www.youtube.com/WisconsinBankers

Register online

at www.wisbank.com/education.

For more information, contact WBA's Miranda Helt at 608/441-1270, by e-mail at mhelt@wisbank.com or visit www.wisbank.com.