



Compliance Journal

Special Focus

Private Flood Insurance

On February 12, 2019 the Federal Financial Institutions Examination Council published a final rule on loans in areas having special flood hazards (2019 final rule). The 2019 final rule amends the flood regulations for the Office of the Comptroller of the Currency, the Board of Governors of the Federal Reserve System, the Federal Deposit Insurance Corporation, the Farm Credit Administration, and the National Credit Union Administration (Agencies). The Agencies issued the 2019 final rule to implement the private flood insurance provisions of the Biggert-Waters Flood Insurance Reform Act of 2012 (Biggert-Waters Act). The 2019 final rule was published in the *Federal Register* on February 20, 2019 and compliance is mandatory on July 1, 2019; however, lenders may begin following the rule now.

Background

The Biggert-Waters Act includes a statutory definition of private flood insurance and directs the Agencies to implement acceptance through rulemaking. In 2013 the Agencies proposed a rule requiring the acceptance of private flood insurance pursuant to the statutory definition. The proposed rule generated interpretive uncertainties that ultimately resulted in the Agencies issuing a revised proposed rule in 2016. The 2019 final rule is an attempt to clarify the definition of private flood insurance under the Biggert-Waters Act.

2019 Final Rule

In addition to attempting to clarify the statutory definition of private flood insurance, the 2019 final rule includes a compliance aid to enable institutions to identify acceptable private policies. Addi-

tionally, subject to certain restrictions, it permits institutions to exercise discretionary acceptance of flood insurance policies that do not meet the definition of private flood insurance. Finally, the rule specifies how lenders may accept policies issued by "mutual aid societies" such as certain Amish Aid Plans.

Definition of Private Flood Insurance

The statutory definition of private flood insurance under the Biggert-Waters Act incorporated factors from the Federal Emergency Management Agency's Mandatory Purchase of Flood Insurance Guidelines. The 2019 final rule attempts to clarify this statutory definition. As such, institutions familiar with the statutory definition will notice slight variations when compared to the 2019 final rule's definition. For purposes of this article, the analysis will focus on the 2019 final rule's definition and not make a comparison.

Under the 2019 final rule, private flood insurance means an insurance policy that:

1. Is issued by an insurance company that is:
 - Licensed, admitted, or otherwise approved to engage in the business of insurance by the insurance regulator of the State or jurisdiction in which the property to be insured is located; or
 - Recognized, or not disapproved, as a surplus lines insurer by the insurance regulator of the State or jurisdiction in which the property to be insured is located in

the case of a policy of difference in conditions, multiple peril, all risk, or other blanket coverage insuring nonresidential commercial property;

2. Provides flood insurance coverage that is at least as broad as the coverage provided under a Standard Flood Insurance Policy (SFIP) for the same type of property, including when considering deductibles, exclusions, and conditions offered by the insurer. To be at least as broad as the coverage provided under an SFIP, the policy must, at a minimum:
 - Define the term "flood" to include the events defined as a "flood" in an SFIP;
 - Contain the coverage specified in an SFIP, including that relating to building property coverage; personal property coverage, if purchased by the insured mortgagor(s); other coverages; and increased cost of compliance coverage;
 - Contain deductibles no higher than the specified maximum, and include similar nonapplicability provisions, as under an SFIP, for any total policy coverage amount up to the maximum available under the National Flood Insurance Program (NFIP) at the time the policy is provided to the lender;
 - Provide coverage for direct physical loss caused by a flood and may only exclude other causes of loss that are excluded in an SFIP. Any exclusions other



than those in an SFIP may pertain only to coverage that is in addition to the amount and type of coverage that could be provided by an SFIP or have the effect of providing broader coverage to the policyholder; and

- Not contain conditions that narrow the coverage provided in an SFIP;
- 3. Includes all of the following:
 - A requirement for the insurer to give written notice 45 days before cancellation or non-renewal of flood insurance coverage to:
 - ▶ The insured; and
 - ▶ The lending institution that made the designated loan secured by the property covered by the flood insurance, or the servicer acting on its behalf;
 - Information about the availability of flood insurance coverage under the NFIP;
 - A mortgage interest clause similar to the clause contained in an SFIP; and
 - A provision requiring an insured to file suit not later than one year after the date of a written denial of all or part of a claim under the policy; and

4. Contains cancellation provisions that are as restrictive as the provisions contained in an SFIP.

Compliance Aid

Pursuant to the above definition, a national bank or Federal savings association must accept private flood insurance in satisfaction of the flood insurance purchase requirements. Thus, a financial institution is required to accept private flood insurance and must also ensure it meets the above definition. However, the 2019 final rule provides a compliance aid to assist in that mandatory acceptance. Pursuant to the compliance aid, a financial institution may determine that a policy meets the definition of private flood insurance without reviewing the policy, if the following statement is included within the policy or as an endorsement to the policy:

“This policy meets the definition of private flood insurance contained in 42 U.S.C. 4012a(b) (7) and the corresponding regulation.”

While the compliance aid provides a safe harbor to financial institutions that accept policies containing the above language, there is no requirement for insurers to include the compliance aid language. Furthermore, because the 2019 final rule prescribes mandatory acceptance of private flood insurance that meets the above definition, financial institutions must accept policies that meet the above definition whether it includes the compliance aid or not. Meaning, a financial institution cannot reject a policy for the sole reason that it does not contain the compliance aid language.

Discretionary Acceptance

The 2019 final rule provides financial institutions the discretionary ability to accept or reject policies that do not meet the above definition of private flood insurance. Lenders may accept such policies, at their own discretion, if the policy:

1. Provides coverage in the amount required by the NFIP;
2. Is issued by an insurer that is licensed, admitted, or otherwise approved to engage in the business of insurance by the insurance regulator of the State or jurisdiction in which the property to be insured is located; or in the case of a policy of difference in conditions, multiple peril, all risk, or other blanket coverage insuring nonresidential commercial property, is issued by a surplus lines insurer recognized, or not disapproved, by the insurance regulator of the State or jurisdiction where the property to be insured is located;
3. Covers both the mortgage-or(s) and the mortgagee(s) as loss payees, except in the case of a policy that is provided by a condominium association, cooperative, homeowners association, or other applicable group and for which the premium is paid by the condominium association, cooperative, homeowners association, or other applicable group as a common expense; and
4. Provides sufficient protection of the designated loan, consistent with general safety and soundness princi-

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ples, and the national bank or Federal savings association documents its conclusion regarding sufficiency of the protection of the loan in writing.

Mutual Aid Societies

In order to meet the mandatory acceptance provisions for private flood insurance, the 2019 final rule permits lenders to accept policies written by mutual aid societies if:

1. The applicable supervisory agency has determined that such plans qualify as flood insurance for purposes of the Act;
2. The plan provides coverage in the amount required by the NFIP;
3. The plan covers both the mortgagor(s) and the mortgagee(s) as loss payees; and
4. The plan provides sufficient protection of the designated loan, consistent with general safety and soundness

principles, and the national bank or Federal savings association documents its conclusion regarding sufficiency of the protection of the loan in writing.

In addition, the rule defines mutual aid society to mean an organization:

1. Whose members share a common religious, charitable, educational, or fraternal bond;
2. That covers losses caused by damage to members' property pursuant to an agreement, including damage caused by flooding, in accordance with this common bond; and
3. That has a demonstrated history of fulfilling the terms of agreements to cover losses to members' property caused by flooding.

Conclusion

With the 2019 final rule becoming effective July 1, 2019, and optional compliance available under the 2019 final rule now, WBA recommends financial institutions review their policies on acceptance of private flood insurance. Financial institutions will need to understand the definition of private flood insurance policies pursuant to the rule, even if they had previously adhered to the statutory definition, as the 2019 final rule implements slight changes. Furthermore, institutions should be prepared to understand the relation of the compliance aid to the mandatory acceptance requirements.

The 2019 final rule may be found here: <https://www.govinfo.gov/content/pkg/FR-2019-02-20/pdf/2019-02650.pdf> ■

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Agencies Finalize Current Expected Credit Losses Methodology for Allowances.

The Board of Governors of the Federal Reserve System (FRB), the Federal Deposit Insurance Corporation (FDIC), and the Office of the Comptroller of the Currency (OCC) 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 current expected credit losses methodology (CECL). 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. The final rule is effective **04/01/2019**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-02-14/pdf/2018-28281.pdf>. *Federal Register*, Vol. 84, No. 31, 02/14/2019, 4222-4250.

Agencies Extend Comment Period for Standardized Approach for Calculating the Exposure Amount of Derivatives Contracts.

The Board of Governors of the Federal Reserve System (FRB), the Federal Deposit Insurance Corporation (FDIC), and the Office of the Comptroller of the Cur-

rency (OCC) published a proposal in the *Federal Register* on **12/17/2018** to amend the agencies' capital rule to implement the Standardized Approach for Calculating the Exposure Amount of Derivatives Contracts. The agencies have decided to extend the comment period for the proposal. The new comment due date is **03/18/2019**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-02-26/pdf/2019-03249.pdf>. *Federal Register*, Vol. 84, No. 38, 02/26/2019, 6107.

CFPB Proposes Rescinding Parts of Payday, Vehicle Title, and Certain High-Cost Installment Loans Rule.

The Bureau of Consumer Financial Protection (CFPB) is proposing to rescind certain provisions of the regulation



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promulgated by the Bureau in November 2017 governing Payday, Vehicle Title, and Certain High-Cost Installment Loans. The provisions of the rule which CFPB proposes to rescind provide that it is an unfair and abusive practice for a lender to make a covered short-term or longer-term balloon-payment loan, including payday and vehicle title loans, without reasonably determining that consumers have the ability to repay those loans according to their terms; prescribe mandatory underwriting requirements for making the ability-to-repay determination; exempt certain loans from the mandatory underwriting requirements; and establish related definitions, reporting, and recordkeeping requirements. Comments are due **05/15/2019**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-02-14/pdf/2019-01906.pdf>. *Federal Register*, Vol. 84, No. 31, 02/14/2019, 4252-4298.

CFPB Proposes Delay of Compliance Date for Payday, Vehicle Title, and Certain High-Cost Installment Loans Rule.

CFPB is proposing to delay the **08/19/2019** 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 by 15 months to **11/19/2020**. Comments are due **03/18/2019**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-02-14/pdf/2019-01905.pdf>. *Federal Register*, Vol. 84, No. 31, 02/14/2019, 4298-4305.

CFPB Announces Technical Specifications for Submissions to the Prepaid Account Agreements Database.

CFPB announced that beginning on **04/01/2019**, prepaid account issuers are required to submit their currently-offered prepaid account agreements to CFPB, to be posted on CFPB's website. CFPB is issuing technical specifications

for those submissions, including the URL for the website at which issuers (or their designees) can register and submit their prepaid account agreements. The announcement relates to a final rule published in the *Federal Register* on **11/22/2016**, as amended on **04/25/2017** and **02/13/2018**, regarding prepaid accounts under Regulations E and Z. The requirement is effective **04/01/2019**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-03-06/pdf/2019-03852.pdf>. *Federal Register*, Vol. 84, No. 44, 03/06/2019, 7979-7980.

CFPB Requests Comment on Residential PACE Financing.

CFPB is soliciting information relating to residential Property Assessed Clean Energy (PACE) financing. CFPB will consider the information it receives in implementing section 307 of the Economic Growth, Regulatory Relief, and Consumer Protection Act (EGRRCPA). In relevant part, EGRRCPA section 307 amends the Truth in Lending Act (TILA) to mandate that CFPB prescribe certain regulations relating to PACE financing. Specifically, the regulations must carry out the purposes of TILA's ability-to-repay (ATR) requirements, currently in place for residential mortgage loans, with respect to PACE financing, and apply TILA's general civil liability provision for violations of the ATR requirements CFPB will prescribe for PACE financing. The regulations must "account for the unique nature" of PACE financing. The notice solicits information to better understand the PACE financing market and the unique nature of PACE financing. Comments are due **05/07/2019**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-03-08/pdf/2019-04177.pdf>. *Federal Register*, Vol. 84, No. 46, 03/08/2019, 8479-8482.

CFPB Requests Comment on Information Collection.

CFPB announced it seeks comment on the information collection titled Bureau of Consumer Financial Protection Speaker Request Form. CFPB also gave notice that

it sent the collection to OMB for review. Comments are due **04/15/2019**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-02-13/pdf/2019-02101.pdf>. *Federal Register*, Vol. 84, No. 30, 02/13/2019, 3795.

FRB Finalizes Amendments to Policy Statement on the Scenario Design Framework for Stress Testing.

The Board of Governors of the Federal Reserve System (FRB) is adopting amendments to its policy statement on the scenario design framework for stress testing. As revised, the policy statement clarifies that the Board may adopt a change in the unemployment rate in the severely adverse scenario of less than 4 percentage points under certain economic conditions and institutes a guide that limits procyclicality in the stress test for the change in the house price index in the severely adverse scenario. The amendments are effective **04/01/2019**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-02-28/pdf/2019-03504.pdf>. *Federal Register*, Vol. 84, No. 40, 02/28/2019, 6651-6664.

FRB Finalizes Stress Testing Policy Statement.

FRB is adopting a final policy statement on the approach to supervisory stress testing conducted under FRB's stress testing rules and FRB's capital plan rule. The statement is effective **04/01/2019**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-02-28/pdf/2019-03503.pdf>. *Federal Register*, Vol. 84, No. 40, 02/28/2019, 6664-6671.

FRB Finalizes Enhanced Disclosure of the Models Used in the Federal Reserve's Supervisory Stress Test.

FRB is finalizing an enhanced disclosure of the models used in the Federal Reserve's supervisory stress test conducted under FRB's Regulation YY pursuant



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to the Dodd-Frank Wall Street Reform and Consumer Protection Act and FRB's capital plan rule. The final rule is effective **04/01/2019**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-02-28/pdf/2019-03505.pdf>. *Federal Register*, Vol. 84, No. 40, 02/28/2019, 6784-6787.

FRB Finalizes Corrections to Regulations K and LL.

FRB published a final rule in the *Federal Register* on **11/21/2018** regarding the Large Financial Institution Rating System. That document included two typographical errors in "Appendix A—Text of Large Financial Institution Rating System" relating to the description of the conditionally meets expectation rating. FRB is now correcting those typographical errors. The correction is effective **02/15/2019**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-02-15/pdf/2019-02516.pdf>. *Federal Register*, Vol. 84, No. 32, 02/15/2019, 4309-4310.

FRB Proposes Amendments to Company-Run Stress-Testing Requirements.

FRB issued a proposed rule that would amend FRB's company-run stress test and supervisory stress test rules, consistent with section 401 of the Economic Growth, Regulatory Relief, and Consumer Protection Act (EGRRCPA). Specifically, the proposed rule would revise the minimum threshold for state member banks to conduct stress tests from \$10 billion to \$250 billion, revise the frequency with which state member banks with assets greater than \$250 billion would be required to conduct stress tests, and remove the adverse scenario from the list of required scenarios. The proposed rule would also make conforming changes to FRB's company-run and supervisory stress test requirements for bank holding companies, U.S. intermediate holding companies of foreign banking organizations, and nonbank financial companies supervised by FRB, FRB's Policy Statement on the Scenario Design Framework

for Stress Testing, and the stress testing requirements for certain savings and loan holding companies that were proposed for public comment on **10/31/2018**. Finally, the proposed rule would revise the scope of applicability of the company-run stress testing requirements for certain savings and loan holding companies that were proposed for public comment on **10/31/2019**. Comments are due: **02/19/2019**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-02-14/pdf/2019-00484.pdf>. *Federal Register*, Vol. 84, No. 31, 02/14/2019, 4002-4012.

FRB Issues Correction to Proposed Amendments to Company-Run Stress-Testing Requirements.

FRB issued a proposed rulemaking issued in the *Federal Register* on **02/14/2019** regarding amendments to company-run stress testing requirements which included the wrong end date for its comment period. FRB is now correcting the notice, the correct comment due date for the proposal is **03/21/2019**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-02-20/pdf/2019-02976.pdf>. *Federal Register*, Vol. 84, No. 34, 02/20/2019, 5014.

FRB Requests Comment on Information Collections.

- FRB announced it seeks comment on the information collection titled The Uniform Application for Municipal Securities Principal or Municipal Securities Representative Associated with a Bank Municipal Securities Dealer. FRB also gave notice that it sent the collection to OMB for review. Comments are due **05/06/2019**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-03-05/pdf/2019-03874.pdf>. *Federal Register*, Vol. 84, No. 43, 03/05/2019, 7902-7904.
- FRB announced it seeks comment on the information collection titled Disclosure Requirements of Regulation Y

Associated with Minimum Requirements for Appraisal Management Companies. FRB also gave notice that it sent the collection to OMB for review. Comments are due **05/06/2019**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-03-06/pdf/2019-04068.pdf>. *Federal Register*, Vol. 84, No. 44, 03/06/2019, 8098-8100.

FDIC Requests Comment on Information Collections.

- The Federal Deposit Insurance Corporation (FDIC) announced it seeks comment on the information collection titled Furnisher Information Accuracy and Integrity (FACTA 312). FDIC also gave notice that it sent the collection to OMB for review. Comments are due **03/15/2019**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-02-13/pdf/2019-02173.pdf>. *Federal Register*, Vol. 84, No. 30, 02/13/2019, 3775-3776.
- FDIC announced it seeks comment on the information collection titled Procedures for Monitoring Bank Protection Act Compliance. FDIC also gave notice that it sent the collection to OMB for review. Comments are due **03/15/2019**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-02-13/pdf/2019-02177.pdf>. *Federal Register*, Vol. 84, No. 30, 02/13/2019, 3777-3778.
- FDIC announced it seeks comment on the information collection titled Notices Required of Government Securities Dealers or Brokers. FDIC also gave notice that it sent the collection to OMB for review. Comments are due **03/15/2019**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-02-13/pdf/2019-02180.pdf>. *Federal Register*, Vol. 84, No. 30, 02/13/2019, 3776-3777.



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- FDIC announced it seeks comment on the information collection titled National Survey of Unbanked and Underbanked Households. FDIC also gave notice that it sent the collection to OMB for review. Comments are due **03/25/2019**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-02-21/pdf/2019-03001.pdf>. *Federal Register*, Vol. 84, No. 35, 02/21/2019, 5434-5435.
- FDIC announced it seeks comment on the information collection titled Registration of Mortgage Loan Originators (SAFE Act). FDIC also gave notice that it sent the collection to OMB for review. Comments are due **04/08/2019**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-03-07/pdf/2019-04139.pdf>. *Federal Register*, Vol. 84, No. 45, 03/07/2019, 8330-8332.

FDIC Extends Comment Period for Information Collection.

FDIC is extending the public comment period for its request for information on the FDIC's deposit insurance application process from **02/11/2019** to **03/31/2019**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-02-13/pdf/2019-02100.pdf>. *Federal Register*, Vol. 84, No. 30, 02/13/2019, 3778-3779.

OCC Proposes Amendments to Stress Testing Rules.

The Office of the Comptroller of the Currency (OCC) issued a proposed rule that would amend the OCC's company-run stress testing requirements for national banks and Federal savings associations, consistent with section 401 of the Economic Growth, Regulatory Relief, and Consumer Protection Act (EGRCPA). Specifically, the proposed rule would revise the minimum threshold for national banks and Federal savings associations to conduct stress tests from \$10 billion to \$250 billion, revise the frequency by

which certain national banks and Federal savings associations would be required to conduct stress tests, and reduce the number of required stress testing scenarios from three to two. The proposed rule would also make certain facilitating and conforming changes to the stress testing requirements. Comments are due **03/14/2019**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-02-12/pdf/2018-27875.pdf>. *Federal Register*, Vol. 84, No. 29, 02/12/2019, 3345-3349.

OCC Requests Comment on Information Collections.

- OCC announced it seeks comment on the information collection titled Annual Stress Test Rule. OCC also gave notice that it sent the collection to OMB for review. Comments are due **03/13/2019**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-02-11/pdf/2019-01720.pdf>. *Federal Register*, Vol. 84, No. 28, 02/11/2019, 3279-3280.
- OCC announced it seeks comment on the information collection titled Identity Theft Red Flags and Address Discrepancies under the Fair and Accurate Credit Transactions Act of 2003. OCC also gave notice that it sent the collection to OMB for review. Comments are due **03/13/2019**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-02-11/pdf/2019-01719.pdf>. *Federal Register*, Vol. 84, No. 28, 02/11/2019, 3280-3282.
- OCC announced it seeks comment on the information collection titled Regulation C—Home Mortgage Disclosure. OCC also gave notice that it sent the collection to OMB for review. Comments are due **04/15/2019**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-02-14/pdf/2019-02328.pdf>. *Federal Register*, Vol. 84, No. 31, 02/14/2019, 4129-4131.

- OCC announced it seeks comment on the information collection titled Interagency Appraisal Complaint Form. OCC also gave notice that it sent the collection to OMB for review. Comments are due **05/03/2019**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-03-04/pdf/2019-03843.pdf>. *Federal Register*, Vol. 84, No. 42, 03/04/2019, 7415-7417.

FEMA Issues Final Rules on Suspensions of NFIP Community Eligibility.

The Federal Emergency Management Agency (FEMA) issued a final rule which identifies communities in the state of **Illinois**, 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.govinfo.gov/content/pkg/FR-2019-02-12/pdf/2019-02015.pdf>. *Federal Register*, Vol. 84, No. 29, 02/12/2019, 3338-3340.

FEMA Issues Notice of Changes in Flood Hazard Determinations.

FEMA has issued a notice which lists communities in the states of **Michigan**, and **Wisconsin**, where the addition or modification of Base Flood Elevations (BFEs), base flood depths, Special Flood Hazard Area (SFHA) boundaries or zone designations, or the regulatory floodway (hereinafter referred to as flood hazard determinations), as shown on the Flood



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Insurance Rate Maps (FIRMs), and where applicable, in the supporting Flood Insurance Study (FIS) reports, prepared by FEMA for each community, is appropriate because of new scientific or technical data. The flood hazard determinations will become effective on the dates listed in the table in the notice and revise the FIRM panels and FIS report in effect prior to the determination for the listed communities. From the date of the second publication of notification of these changes in a newspaper of local circulation, any person has ninety (90) days in which to request through the community that the Deputy Associate Administrator for Mitigation reconsider the changes. The flood hazard determination information may be changed during the 90-day period. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-02-12/pdf/2019-01934.pdf>. *Federal Register*, Vol. 84, No. 29, 02/12/2019, 3479-3481.

FEMA Issues Proposed Flood Hazard Determinations.

- FEMA has requested comments on proposed flood hazard determinations, which may include additions or modifications of any Base Flood Elevation (BFE), base flood depth, Special Flood Hazard Area (SFHA) boundary or zone designation, or regulatory floodway on the Flood Insurance Rate Maps (FIRMs), and where applicable, in the supporting Flood Insurance Study (FIS) reports for communities in the state of **Ohio**. The FIRM and FIS report are the basis of the floodplain management measures that the community is required either to adopt or to show evidence of having in effect in order to qualify or remain qualified for participation in the National Flood Insurance Program (NFIP). Comments are due **05/16/2019**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-02-15/pdf/2019-02564.pdf>. *Federal Register*, Vol. 84, No. 32, 02/15/2019, 4515-4516.

- FEMA has requested comments on proposed flood hazard determinations, which may include additions or modifications of any Base Flood Elevation (BFE), base flood depth, Special Flood Hazard Area (SFHA) boundary or zone designation, or regulatory floodway on the Flood Insurance Rate Maps (FIRMs), and where applicable, in the supporting Flood Insurance Study (FIS) reports for communities in the state of **Iowa**. The FIRM and FIS report are the basis of the floodplain management measures that the community is required either to adopt or to show evidence of having in effect in order to qualify or remain qualified for participation in the National Flood Insurance Program (NFIP). Comments are due **06/03/2019**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-03-05/pdf/2019-03860.pdf>. *Federal Register*, Vol. 84, No. 43, 03/05/2019, 7922-7924.

- FEMA has requested comments on proposed flood hazard determinations, which may include additions or modifications of any Base Flood Elevation (BFE), base flood depth, Special Flood Hazard Area (SFHA) boundary or zone designation, or regulatory floodway on the Flood Insurance Rate Maps (FIRMs), and where applicable, in the supporting Flood Insurance Study (FIS) reports for communities in the states of **Illinois, Minnesota, Nebraska, and Ohio**. The FIRM and FIS report are the basis of the floodplain management measures that the community is required either to adopt or to show evidence of having in effect in order to qualify or remain qualified for participation in the National Flood Insurance Program (NFIP). Comments are due **06/03/2019**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-03-05/pdf/2019-03866.pdf>. *Federal Register*, Vol. 84, No. 43, 03/05/2019, 7920-7922.

Treasury Finalizes Civil Penalty Assessment for Misuse of Names, Symbols, etc.

The Department of the Treasury (Treasury) amends regulations that provide civil penalties for misuse of Department of the Treasury names, symbols, etc. to implement the Federal Civil Penalties Inflation Adjustment Act of 1990. In particular, the rule adjusts for inflation the maximum amount of the civil monetary penalties that may be assessed under its regulations, and updates the inflation adjustments through 2018 in accordance with instructions from OMB. In addition, the regulation is amended to reflect changes in Treasury organizational structure. The rule is effective **04/12/2019**, comments are due **03/13/2019**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-02-11/pdf/2019-01926.pdf>. *Federal Register*, Vol. 84, No. 28, 02/11/2019, 3105-3107.

Treasury Issues Amendment to Guarantee Application Deadline.

Treasury issued a Notice of Guarantee Availability for the Community Development Financial Institutions Fund in the *Federal Register* on **11/06/2018** announcing the availability of up to \$500 million in Guarantee Authority. Treasury is now amending the Guarantee Application deadline from **02/26/2019** to **03/26/2019**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-02-25/pdf/2019-03204.pdf>. *Federal Register*, Vol. 84, No. 37, 02/25/2019, 6043.

Treasury Requests Comment on Information Collection.

Treasury announced it seeks comment on the information collection titled Certain Cash or Deferred Arrangements and Employee and Matching Contributions under Employee Plans: Retirement Plans; Cash or Deferred Arrangements. Treasury also gave notice that it sent the collection to OMB for review. Comments are due **05/03/2019**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR->



Regulatory Spotlight

[2019-03-04/pdf/2019-03729.pdf](#). *Federal Register*, Vol. 84, No. 42, 03/04/2019, 7417-7418.

FHFA Finalizes Federal Home Loan Bank Capital Requirements.

The Federal Housing Finance Agency (FHFA) is issuing a final rule to adopt as its own portions of the regulations of the Federal Housing Finance Board pertaining to the capital requirements for the Federal Home Loan Banks (Banks). The final rule carries over most of the existing Finance Board regulations without material change, but substantively revises the credit risk component of the risk-based capital requirement, as well as the limitations on extensions of unsecured credit. The principal revisions to those provisions remove requirements that the Banks calculate credit risk capital charges and unsecured credit limits based on ratings issued by a Nationally Recognized Statistical Rating Organization (NRSRO), and instead require that the Banks use their own internal rating methodology. The final rule also revises the percentages used in the tables to calculate the credit risk capital charges for advances and non-mortgage assets. FHFA retains the percentages used in the existing table to calculate the capital charges for mortgage-related assets, but revises the approach to identify the appropriate percentage within the table. FHFA also has revised the table numbers in the final rule to align with the *Federal Register*'s new formatting standards, which were revised after publication of the proposed rule. The final rule is effective **01/01/2020**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-02-20/pdf/2018-27918.pdf>. *Federal Register*, Vol. 84, No. 34, 02/20/2019, 5308-5333.

FHFA Finalizes Amendments to Uniform Mortgage-Backed Security.

FHFA is issuing a final rule to improve the liquidity of the Federal National Mortgage Association (Fannie Mae) and the Federal Home Loan Mortgage Corporation (Fred-

die Mac) To-Be-Announced (TBA) eligible mortgage-backed securities (MBS) by requiring the Enterprises to maintain policies that promote aligned investor cash flows for both current TBA-eligible MBS, and, upon its implementation, for the Uniform Mortgage-Backed Security (UMBS)—a common, fungible MBS that will be eligible for trading in the TBA market for fixed-rate mortgage loans backed by one-to-four unit (singlefamily) properties. The final rule codifies alignment requirements that FHFA implemented under the Fannie Mae and Freddie Mac conservatorships. The rule is integral to the successful transition to and ongoing fungibility of the UMBS. FHFA has announced that the Enterprises will begin issuing UMBS in place of their current TBA-eligible securities on **06/03/2019**. The rule is effective **05/06/2019**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-03-05/pdf/2019-03934.pdf>. *Federal Register*, Vol. 84, No. 43, 03/05/2019, 7793-7801.

SEC Issues Civil Monetary Penalty Inflation Adjustments.

The Securities and Exchange Commission (SEC) sets forth the annual inflation adjustment of the maximum amount of civil monetary penalties administered by SEC under the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Company Act of 1940, the Investment Advisers Act of 1940, and certain penalties under the Sarbanes-Oxley Act of 2002. These amounts are effective beginning on **01/15/2019**, and will apply to all penalties imposed after that date for violations of the aforementioned statutes that occurred after **11/02/2015**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-02-20/pdf/2019-02699.pdf>. *Federal Register*, Vol. 84, No. 34, 02/20/2019, 5122-5124.

FASB Proposes Federal Financial Accounting Technical Release.

The Federal Accounting Standards Advisory Board (FASB) has released an exposure draft of a proposed Federal

Financial Accounting Technical Release (TR) titled Conforming Amendments to Technical Releases for SFFAS 54, Leases: An Amendment of SFFAS 5, Accounting for Liabilities of the Federal Government and SFFAS 6, Accounting for Property, Plant, and Equipment, for public comment. The proposed TR is available on the FASB website at <https://www.fasab.gov/documents-forcomment/>. Copies can be obtained by contacting FASB at (202) 512-7350. Comments are due **04/01/2019**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-03-01/pdf/2019-03702.pdf>. *Federal Register*, Vol. 84, No. 41, 03/01/2019, 7049.

FASB Proposes Statement of Federal Financial Accounting Standards Omnibus Amendments.

FASB has issued an exposure draft of a proposed Statement of Federal Financial Accounting Standards (SFFAS) titled Omnibus Amendments: Rescinding Statement Of Federal Financial Accounting Standards 8 And Amending Statements Of Federal Financial Accounting Standards 5, 6, And 49. The exposure draft is available on the FASB website at <https://www.fasab.gov/documents-forcomment/>. Copies can be obtained by contacting FASB at (202) 512-7350. Comments are due **04/23/2019**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-03-01/pdf/2019-03702.pdf>. *Federal Register*, Vol. 84, No. 41, 03/01/2019, 7049.

NCUA Proposes Amendments to Supervisory Committee Audits and Verifications.

The National Credit Union Administration (NCUA) proposes to amend its regulations governing the responsibilities of a federally insured credit union (FICU) to obtain an annual supervisory committee audit of the credit union. The proposal implements recommendations outlined in the NCUA's Regulatory Reform Task Force's Regulatory Reform Agenda (Agenda) and will provide additional flexibility to FICUs.



Regulatory Spotlight

Comments are due **04/26/2019**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-02-25/pdf/2019-03164.pdf>. *Federal Register*, Vol. 84, No. 37, 02/25/2019, 5957-5960.

NCUA Requests Comment on Information Collections.

NCUA announced it seeks comment on the information collection titled Organization and Operations of Federal Credit Unions—Loan Participation. NCUA also gave notice that it sent the collection to OMB for review. Comments are due **03/14/2019**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-02-12/pdf/2019-02091.pdf>. *Federal Register*, Vol. 84, No. 29, 02/12/2019, 3503.

SSA Finalizes Rule Prohibiting Persons With Certain Criminal Convictions From Serving as Representative Payees.

The Social Security Administration (SSA) finalized regulations on conducting background checks to prohibit persons convicted of certain crimes from serving as representative payees under the Social Security Act, as required by the Strengthening Protections for Social Security Beneficiaries Act of 2018. The final rule is effective **03/18/2019**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-02-15/pdf/2019-02483.pdf>. *Federal Register*, Vol. 84, No. 32, 02/15/2019, 4323-4326.

VA Requests Comment on Information Collection.

The Department of Veterans Affairs (VA) announced it seeks comment on the information collection titled Loan Analysis. VA also gave notice that it sent the collection to OMB for review. Comments are due **05/06/2019**. The notice may be viewed at: <https://www.govinfo.gov/content/pkg/FR-2019-03-06/pdf/2019-03985.pdf>. *Federal Register*, Vol. 84, No. 44, 03/06/2019, 8154. ■

Compliance Notes

▲ FDIC has added a new, online Information and Support Center to the agency's existing educational resources. Consumers can use the Center to easily check the status of inquiries or complaints they have made about a financial institution. Also included is a new FDIC Knowledge Center, which provides easy-to-find answers to questions about banking and lending. The notice may be viewed at: <https://www.fdic.gov/news/news/press/2019/pr19013.html>

▲ OCC issued a bulletin to notify banks about key data fields that OCC has determined examiners will typically use to test and validate the accuracy and reliability of home mortgage loan data collected beginning in 2018. The bulletin may be viewed at: <https://www.occ.gov/news-issuances/bulletins/2019/bulletin-2019-12.html>

▲ CFPB issued a report titled Suspicious Activity Reports on Elder Financial Exploitation: Issues and Trends. The report analyzes a non-public data set to shed light on the volume and characteristics of elder financial exploitation. The study

explores the Suspicious Activity Reports (SARs) filed with the federal government by financial institutions such as banks and money services businesses, finding that SAR filings on elder financial exploitation quadrupled from 2013 to 2017. The report may be viewed at: https://s3.amazonaws.com/files.consumerfinance.gov/f/documents/cfpb_suspicious-activity-reports-elder-financial-exploitation_report.pdf

▲ FRB has released December 31, 2018, compiled quarterly data on depository institutions that participate in the Treasury's Minority Bank Deposit Program. The data may be viewed at: <https://www.federalreserve.gov/releases/mob/current/default.htm>

▲ In anticipation of the effective date for its prepaid rule, CFPB has developed a number of guides and tools, including a new electronic submission system that allows an issuer to submit its required prepaid account agreements online. The resources may be viewed at: <https://www.consumerfinance.gov/data-research/prepaid-accounts/>

▲ FFIEC issued a policy statement on the report of examination to promote consistency, clarity and ease of reference for the presentation of information in examination reports. The policy statement may be viewed at: <https://www.ffiec.gov/guidance/PolicyStatement030619.pdf>

▲ CFPB announced that that 40 new organizations have joined the 2019 Your Money, Your Goals cohort. Each year, organizations that are selected for the cohort receive training and technical assistance on how to use the Your Money, Your Goals tools to help them discuss money topics with the people they serve in their communities. The announcement may be viewed at: <https://www.consumerfinance.gov/about-us/blog/2019-your-money-your-goals-cohort/>

▲ CFPB has developed a program titled "Get Homebuyer Ready," an email course to educate consumers on the homebuying process and equip them with resources. The course may be viewed at: <https://www.consumerfinance.gov/about-us/blog/buying-home-sign-our-buying-house-newsletter/>



Compliance Notes

▲ FRB has voted to affirm the Countercyclical Capital Buffer (CCyB) at the current level of 0 percent. In making this determination, FRB followed the framework detailed in the Board's policy statement for setting the CCyB for private-sector credit exposures located in the United States. The buffer is a macroprudential tool that can be used to increase the resilience of the financial system by raising capital requirements on internationally active banking organizations when there is an elevated risk of above-normal future losses and when the banking organizations for which capital requirements would be raised by the buffer are exposed to or are contributing to this elevated risk—either directly or indirectly. The buffer could also help moderate fluctuations in the supply of credit. The CCyB is designed to be released when economic conditions deteriorate, in order to support lending and economic activity more broadly. The announcement may be viewed at: <https://www.federalreserve.gov/newsevents/pressreleases/bcreg20190306c.htm>

▲ CFPB has posted an article on IRS imposter scams. The article outlines how to identify if the call is a scam and ways consumers can protect themselves. The article may be viewed at: <https://www.consumerfinance.gov/about-us/blog/tax-season-protect-yourself-irs-imposter-scams/>

▲ FTC announced that imposter scams topped the list of consumer complaints submitted in 2018 to the Federal Trade Commission's nationwide Consumer Sentinel database, driven in part by a jump in reports about government imposter scams. In all, the FTC received nearly three million complaints from consumers in 2018. Consumers reported losing nearly \$1.48 billion to fraud in 2018—38 percent more than the year before. Debt collection complaints dropped to the number two spot after topping the FTC's list of consumer complaints for the previous three years. The report may be viewed at: <https://www.ftc.gov/news-events/press-releases/2019/02/imposter-scams-top-complaints-made-ftc-2018>

▲ CFPB has issued the small entity compliance guide for the Payday Lending Rule. The guide may be viewed at: https://files.consumerfinance.gov/f/documents/cfpb_payday_small-entity-compliance-guide.pdf

▲ FRB presented its semiannual Monetary Policy Report to Congress. The report indicated that Economic activity in the United States appears to have increased at a solid pace, on balance, over the second half of 2018, and the labor market strengthened further. Inflation has been near the Federal Open Market Committee's (FOMC) longer-run objective of 2 percent, aside from the transitory effects of recent energy price movements. The report may be viewed at: <https://www.federalreserve.gov/monetarypolicy/2019-02-mpr-summary.htm>

▲ OFAC's Office of Compliance and Enforcement (OCE) is issuing OCE's Data Delivery Standards Guidance: Preferred Practices for Productions to OFAC. OCE's Data Delivery Standards provides guidance regarding submissions and the technical standards for the preferred format in which to submit electronic document productions to OCE, including administrative subpoena responses, self-disclosures, and other documents or reports. The guidance may be viewed at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Documents/ofac_data_delivery.pdf

▲ CFPB has announced an initiative to help promote the importance of savings among Americans. The Start Small, Save Up initiative offers tips, tools and information to help consumers build a basic savings cushion and saving habit, as a foundation for securing their financial futures. More information on the initiative may be viewed at: <https://www.consumerfinance.gov/start-small-save-up/>

▲ FHFA reported that Fannie Mae and Freddie Mac completed 245,620 refinances in the fourth quarter of 2018, compared with 253,135 in the third quarter. FHFA's fourth quarter Refinance Report also shows that 1,390 loans were

refinanced through the Home Affordable Refinance Program (HARP), bringing the total number of HARP refinances to 3,494,395 since inception of the program in 2009 and completion in Dec. 31, 2018. The report may be viewed at: <https://www.fhfa.gov/Media/PublicAffairs/Pages/Fannie-Mae-and-Freddie-Mac-Refinance-Volume-Decreases-In-4th-Quarter-2018.aspx>

▲ FTC will host a forum on small business financing on May 8, 2019, to examine trends and consumer protection issues in this marketplace, including the recent proliferation of online loans and alternative financing products. The forum, which is free and open to the public, will be at the Constitution Center, 400 7th St., SW, Washington, D.C. It will be webcast live on the FTC's website. A full schedule and other details on the forum will be announced. Information on the forum may be viewed at: <https://www.ftc.gov/news-events/events-calendar/strictly-business-ftc-forum-small-business-financing> ■



MARCH

- **Call Report Review & Update Workshop**
5 Wisconsin Dells – \$245/attendee;
Live Recording Available – \$749/connection
- **Principles of Banking Course**
5-6 Fond du Lac – \$550/attendee;
7-8 Madison – \$550/attendee;
- **Loan Compliance School**
11-15 Wisconsin Dells – \$1,295/attendee*
- **Branch Manager Boot Camp**, Madison
11-12 Four days (March 11, 12, April 10, and 11)
\$950/attendee or \$350/day/attendee
- **Advanced IRA Workshop**
13 Rothschild/Wausau – \$225/attendee
14 Madison – \$225/attendee
- **Real Estate Compliance School**
13-15 Wisconsin Dells – \$795/attendee*
- **Credit Analysis Boot Camp**
~~14-15 Madison – \$495/attendee*~~ **Session Full**
28-29 Green Bay – \$495/attendee*
- **Security Officer Workshops**
19 Green Bay – \$175/attendee
20 Eau Claire – \$175/attendee
21 Wisconsin Dells – \$175/attendee
- **Loan Documentation Webinar Series: Part 2**
19 (3-part series; including recordings)
\$749 + sales tax/connection
- **Cash Management Workshop**
25 Wisconsin Dells – \$245/attendee
- **Enterprise Risk Management Workshop**
26 Wisconsin Dells – \$245/attendee

APRIL

- **WBA/ABA Washington Summit**
1-3 Washington, D.C.
- **Loan Documentation Webinar Series: Part 3**
9 (3 part series; including recordings)
\$749 + sales tax/connection
- **Agricultural Bankers Conference**, Wisconsin Dells
10-11 \$350/attendee; \$275/Ag Section member attendee
- **Branch Manager Boot Camp**, Madison
10-11 Four days (March 11, 12, April 10, and 11)
\$950/attendee or \$350/day/attendee

*Lodging is available for an additional fee.

APRIL *(continued)*

- 12 • **National Teach Children to Save Day**
- **Power of Community Week**
22-26 www.wisbank.com/BanksPowerWI
- **Women in Banking Conference**
23 Wisconsin Dells – \$245/for first two attendees;
\$195/additional attendee(s)
- **Community Bankers for Compliance (CBC) – Session 2**
23 Stevens Point (*pricing options vary*)
24 Madison (*pricing options vary*)
- **Safe Deposit Liability Webinar**
25 \$325 + sales tax/connection
- **ICBA Washington Policy Summit**
4/28 -5/1 Washington, D.C.
- **Business Banking Boot Camp**
4/30 -5/1 De Pere – \$695/attendee*

MAY

- **Business Banking Boot Camp**
2-3 Madison – \$695/attendee*
- **Principles of Banking Course**
2-3 Lake Hallie – \$550/attendee
- **Trust Conference**
3 Wisconsin Dells – \$245/attendee
- **School of Bank Management**
5-10 Madison – \$1,395/attendee*
- **Wisconsin Consumer and Marital Property Acts Webinar**
7 \$325 + sales tax/connection
- **Human Resources Conference**
9 Stevens Point – \$225/attendee
- **FIPCO Compliance & Software Forum (Deposit)**
14 Wisconsin Dells
- **Compliance Management School**
14-16 Wisconsin Dells – \$795/attendee*
- **Lending Boot Camp**
14-16 Wisconsin Dells – \$795/attendee*
(2-day registration also available, \$535/attendee)*
- **IT Risk Management Seminar**
16 Wisconsin Dells – \$245/attendee
- **Capitol Day**
21 Madison – FREE

(over)

Conferences | Summits

Schools | Boot Camps

Seminars | Workshops

WBA Webinars

Other Events

MAY *(continued)*

- **HSA Workshop**
23 Wisconsin Dells – \$225/attendee
- **BSA/AML Compliance Conference**
29-30 Wisconsin Dells – \$449/attendee
- **Bank Directors Summit**
TBD – \$225/first attendee; \$175/additional attendee

JUNE

- **Managing Levies, Garnishments and Other Legal Process in Wisconsin Webinar**
4 \$325 + sales tax/connection
- **BOLT Summer Leadership Summit**
11-12 Wisconsin Dells – \$150/attendee
- **Compliance Forum: Session 1**
18 Stevens Point \$1,400/bank membership
19 Wisconsin Dells (includes 2 registrations
20 Pewaukee for each of 3 sessions)
- **Advertising Law Webinar Series: Part 1**
26 (2-part series; including recordings)
\$499 + sales tax/connection

JULY

- **Community Bankers for Compliance (CBC) – Session 3**
16 Stevens Point (*pricing options vary*)
17 Madison (*pricing options vary*)
- **Advertising Law Webinar Series: Part 2**
17 (2-part series; including recordings)
\$499 + sales tax/connection
- **ABA CRCM Prep Course**, Chicago
22-26 \$2,495/ABA Member; \$2,995/Nonmember*
- 7/31 • **Agricultural Lending School**
-8/2 Rothschild – \$895/attendee*
7/30 \$200/attendee for additional pre-school workshop*

SEPTEMBER

- **Management Conference** – including
CFO Conference, Wisconsin Dells*
10-11 \$250/attendee for first two attendees;
\$195/additional attendee

SEPTEMBER *(continued)*

- **Secur-I.T. Conference**, Wisconsin Dells
17-18 \$350/first attendee; \$300/additional attendee
- **Introduction to Commercial Lending School**
18-20 De Pere – \$795/attendee*
- **Supervisor Boot Camp**
24-25 Wisconsin Dells – \$535/attendee*
- 9/30 • **Deposit Compliance School**
-10/1 Wisconsin Dells – \$535/attendee*

OCTOBER

- **Personal Banker School**
8-9 Wisconsin Dells – \$450/attendee*
- **Community Bankers for Compliance (CBC) – Session 4**
15 Stevens Point (*pricing options vary*)
16 Madison (*pricing options vary*)
- **Compliance Forum: Session 2**
22 Stevens Point (*pricing options vary*)
23 Wisconsin Dells (*pricing options vary*)
24 Pewaukee (*pricing options vary*)
- **BSA/AML Workshops**
29 Eau Claire; \$245/attendee
30 Neenah; \$245/attendee
31 Madison; \$245/attendee
- **Procedures Upon a Depositor's Death Webinar**
30 \$325 + sales tax/connection
- **IRA Essentials Workshops**
October TBD – \$225/attendee
- **Advanced IRA Workshops**
October TBD – \$225/attendee

NOVEMBER

- **Auditing Real Estate Loans Boot Camp**
5-7 Wisconsin Dells – \$795/attendee*
- **BOLT Winter Leadership Summit**
7 Stevens Point – \$100/attendee*
- **LEAD360 Conference: Marketing, Retail Banking, Sales and Financial Literacy**, Wisconsin Dells
20-21 \$350/attendee; \$300 additional attendee*

*Lodging is available for an additional fee.

» Visit www.wisbank.com/education for more information and online registration.

» For questions or more information, email WBA Education at wbaeducation@wisbank.com or 608-441-1252.