

Online Compliance Consulting Update!

The Online Compliance Consulting Dashboard has been enhanced!

Updates include:

- NEW Compliance Alert – Interagency Guidance on HELOCs
- NEW Compliance Alert – OFAC and Sectoral Sanctions Identifications
- NEW Compliance Alerts on Reg X & Reg Z Integrated Mortgage Disclosures:
 - Part 1 – Loan Estimates
 - Part 2 – Closing Disclosures
- UPDATED Compliance Alert on UDAAP

To access these and all other compliance features, go to:

<http://compliance.smslp.com/>

Be Prepared!

Mark your calendar for our next *Be Prepared!* Quarterly Compliance Update webinar. It is scheduled for 11/20/14. Details can be found at: <http://www.bankersweb.com/>

One Step Closer to HMDA Changes

On August 29th, the CFPB issued a **proposed** rule to amend Regulation C, which implements the Home Mortgage Disclosure Act (HMDA). These long-awaited changes are being proposed in connection with certain Dodd-Frank Act provisions. The rule is open for comment through October 29, 2014.

The proposal covers higher level issues, such as changes to institutional and transactional coverage. Related to these amendments is a proposal that institutions with larger numbers of reportable transactions will report their HMDA data on a quarterly, rather than annual, basis. However, HMDA reporters are likely more concerned with the proposed detailed specifics that, if approved, will require the reporting of new data elements.

The new (or modified) data elements addressed in the proposal include:

- Information about applicants, borrowers, and the underwriting process, such as age, credit score, debt-to-income ratio, reasons for denial, the application channel and automated underwriting system results.
- Information about the property securing the loan, such as construction method, property value, lien priority, the number of dwelling units and additional information about manufactured and multifamily housing.
- Information about the features of the loan, such as additional pricing information, loan term, interest rate, introductory rate period, non-amortizing features, and the type of loan.
- Certain unique identifiers, such as universal loan identifier, property address, loan originator identifier, and a legal entity identifier for the financial institution.

The CFPB's proposal also includes amendments and clarifications to address some longstanding aspects of the regulation that institutions have identified as being unclear or confusing. Clarifications are included to help identify the types of residential structures that are considered dwellings, the treatment of multiple properties and manufactured homes, as well as guidance on the coverage of preapproval programs and temporary financing.

You may find the **proposed** rule [here](#).

Updated Integrated Mortgage Disclosure Resources

In November 2013, the CFPB issued a final rule amending Regulations X and Z, that requires new "integrated mortgage disclosures." Even though this rule has been out for some time, and does not become effective until August 1, 2015; you'll want to be aware of some updated resources as you work towards compliance.

While the CFPB issued their "Small Entity Compliance Guide" on this topic in March, you should be aware that an updated guide was issued this month. Updates include additional

clarification related to Loan Estimates and the 7 day waiting period. The CFPB also updated their “Guide to the Loan Estimate and Closing Disclosure forms” this month. Clarifications were provided in describing time periods less than whole years and providing appraisals for certain loans.

Besides the referenced updates, the CFPB has also added a new resource entitled “TILA RESPA Integration Disclosure – timeline example.” This document illustrates how various events can affect the origination of a loan and helps clarify how new regulatory requirements would appear, as plotted out on a calendar.

You may find the **updated and new** resources [here](#).

Convenient and Affordable Compliance Assistance

Do you need help preparing for new regulatory requirements? SC+S can help with our Online Compliance Consulting services.

Online Compliance Consulting combines the ease of online tools with the guidance of a compliance expert.

You will have access to an online compliance expert who will:

- Answer all of your compliance questions;
- Review your new policies and disclosures for compliance; and
- Train your Board of Directors on upcoming regulatory requirements.

You will also receive access to our online tools, including:

- Our Compliance Calendar;
- Our Progress List, that enables you to determine what steps you will need to take to comply with the requirements and track your progress as you implement them;
- Our exclusive Knowledge Base of compliance questions and answers; and
- FREE access to our quarterly Be Prepared! webinar series on upcoming regulatory requirements.

For more information or a free demo, contact Rhonda Coggins at rcoggins@smslp.com.

Contact Us

Sheshunoff Consulting + Solutions

901 S. Mopac Expressway
Barton Plaza V, Suite 140
Austin, TX 78746

© 2014 SCSR, L.L.C.

No further reproduction or distribution is allowed outside your organization without permission.