



## Private Flood Insurance Proposal

In 2015, five federal regulatory agencies (OCC, FRB, FDIC, Farm Credit Association & NCUA) approved and published a final rule modifying their regulations regarding loans in flood areas. In the preamble to that rule, the Agencies made clear that they would address the private flood insurance provisions in Biggert-Waters in a separate rulemaking. That separate rulemaking has now been published in the form of a proposed rule.

While institutions have relied on the Interagency Flood Q&A's for some limited guidance related to private insurance, the proposed rule, if approved, establishes mandatory acceptance of policies that meet the statutory definition of private flood insurance. The new rules also include a "compliance aid" for mandatory acceptance that outlines support for whether a policy is deemed to meet the definition. Also, the rules address discretionary acceptance of policies that do not meet the definition of private insurance, subject to restrictions.

The proposed rule is currently out for comments, which must be received on or before **January 6, 2017**. It may be found [here](#).

## Online Compliance Consulting Update!

The Online Compliance Consulting Dashboard has been enhanced!

- **Knowledge Base Updates:**
  - ✓ NEW Compliance Alert – Reg X Servicing Amendments
  - ✓ NEW Compliance Alert – Reg Z Servicing Amendments
  - ✓ 12 NEW Truth in Savings Q&As
  - ✓ 22 NEW Fair Lending Q&As
  - ✓ 100+ NEW BSA-related Q&As
  - ✓ October 2016 News
- **Important Resource / Tool Updates:**
  - ✓ UPDATED Implementation Checklists
  - ✓ UPDATED Regulatory Deadline Matrix
  - ✓ UPDATED Compliance Calendar

To access this information and all other compliance features, go to: <http://compliance.smslp.com/>

## FFIEC – Uniform Consumer Compliance Rating System

The FFIEC (comprised of the FRB, CFPB, FDIC, NCUA, OCC and State Liaison Committee) issued a Notice of their revised Uniform Interagency Consumer Compliance Rating System.

While the revisions to the rating system do not set new or higher expectations and represent no additional regulatory burden, they were established to better reflect current supervisory approaches and to align with current risk-based, tailored examination processes.

With this rollout, it can be a perfect time for compliance stakeholders to review the ratings and definitions and to apply them to their environment. This type of analysis can reveal areas where more resources should be dedicated. The revised rating system is effective **March 31, 2017**. The final guidance includes a chart of assessment factors to be considered, accompanied with definitions and ratings. It was published in the Federal Register earlier this month and may be found [here](#).

## NEW FDIC Recordkeeping Rule

If your institution is insured by the FDIC and holds a large number of deposit accounts, this new final rule will be of interest.

In a November press release, the FDIC announced a new final rule requiring insured depository institutions with more than 2 million deposit accounts to meet certain recordkeeping requirements. The new requirements are established to help facilitate payments of insured deposits to customers if the institution were to fail. Covered institutions will need to configure their information technology system to be capable of calculating the insured and uninsured amount in each deposit account by ownership right and capacity. They would also need to maintain complete and accurate information needed by the FDIC to determine deposit insurance coverage.

As noted in the final rule, it is effective on **April 1, 2017**; however, a covered institution has three years after the effective date for implementation and can apply to the FDIC for an extension of that timeframe. The FDIC's press release and link to the final rule may be found [here](#).

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## Convenient and Affordable Compliance Assistance

Do you need help preparing for the upcoming regulatory requirements? SC+S can help with our Online Compliance Consulting services, which 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 Dashboard Feature and 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 Q&As; and
- FREE access to our quarterly Be Prepared! webinar series.

**For more information or a free demo, contact Rhonda Coggins at 512-703-1509.**



Mark your calendar for our next **Be Prepared!** Compliance Update webinar. It is scheduled for **December 15, 2016**.

When available, details can be found on BankersWEB, [here](#).

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## Contact Us

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