



Did you know... the 2018 HMDA changes adjust transactional coverage to a “dwelling secured” standard?

So, if that's true, how can a loan secured by land only be covered?



Attend our upcoming quarterly Be Prepared! webinar to find out!

December 8, 2017... why is it important?

You may recall that in 2012, the **National Flood Insurance Program (NFIP)** was set to expire. At that time, a long term resolution was approved and the NFIP was reauthorized for 5 years. While that 5 year term was slated to end on **September 30, 2017**; the NFIP has recently received a short reprieve.



Earlier this month, President Trump signed legislation passed by both houses of Congress that reauthorizes the NFIP for three months. As we've confirmed with our contacts at FEMA, Congress must reauthorize the NFIP by **December 8, 2017**, to ensure that the NFIP does not lapse.

The **Federal Emergency Management Agency (FEMA)** is empowered to issue policies of flood insurance when Congress authorizes the NFIP. When the NFIP is not reauthorized, FEMA's authority expires and they may not issue new policies or renew or increase coverage on existing policies.

Online Compliance Consulting Update!

The Online Compliance Consulting Dashboard has been enhanced!

- ✓ Updated Alert – RESPA Mortgage Servicing
- ✓ Updated Alert – Reg. Z Mortgage Servicing
- ✓ Updated Alert – Reg. C HMDA Final Rules
- ✓ Knowledge Base Q&As – Lapse in NFIP
- ✓ August 2017 News

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

So, what happens if the NFIP is not reauthorized and the program lapses?

Fortunately, the federal banking agencies have issued guidance to assist institutions in dealing with periods of lapse in FEMA's authority. In large part, institutions are still required to obtain flood determinations and provide required notices. However, the guidance addresses the options for handling new loans and renewals. In the event of a lapse of NFIP, we recommend that you review guidance from your supervisory agency.

Our clients may find related information in our Knowledge Base.

Updated HMDA Resources

In last month's news, an article discussed the CFPB's new final rule (August 2017) amending **HMDA**. As institutions are preparing for the new changes to become effective January 1, 2018, compliance personnel are reminded to refer to updated resources as they are made available.

While the CFPB's website currently reflects an updated **Executive Summary** and updated **Filing Instructions Guide (FIG)**, other resources have yet to be amended. Interested persons may find the CFPB's HMDA Implementation page [here](#).

CFPB Releases Updated Examination Manual

In August, 2017, the CFPB released their updated **Supervision and Examination Manual**. Even if you are not supervised by the CFPB, they do have authority for a majority of the federal consumer compliance regulations to which institutions must adhere and summary information contained therein can be very helpful. The manual can now be downloaded in full, containing all sections.

As reflected in this recent issuance, the **Compliance Management System (CMS)** section was updated on August 30th. It provides helpful information on CMS and its integration into the overall "framework for product design, delivery, and administration" across the entire product and service lifecycle.

Interested persons may find the updated manual [here](#).

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 **September 21, 2017**.

Details may be found on BankersWEB, [here](#).

Contact Us

Sheshunoff Consulting + Solutions

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

© 2017 SCSR, L.L.C.

You have received this newsletter as either a complement to other SC+S services you receive, or in response to your request. If you no longer wish to receive this newsletter, please send an email to compliance@smslp.com.

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