InfoSight
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Compliance eNEWSLETTER
powered by the Georgia Credit Union Affiliates

Compliance News

Week Three Supervisory Priority Highlight:
Consumer Compliance
The goal of NCUA is to protect credit union members and consumers by raising awareness of potential fraud and by examining credit unions for compliance with consumer financial laws and regulations. Examiners use consumer compliance regulations to evaluate whether your credit union's policies and procedures meet those expectations. Four focus areas for consumer compliance this year will be Home Mortgage Disclosures Act (HMDA), Military Lending Act (MLA), Regulation B and Regulation E.

HMDA
Just as they did last year, examiners will conduct limited reviews of HMDA quarterly or full-year Loan/Application Registers (LAR) depending on which is applicable to your credit union. Examiners are looking to see if you have established a good faith effort to comply with the 2018 HMDA data collection and reporting requirements, including procedures that reflect an account of partial exemption that went into effect with the passing of Economic Growth, Regulatory Relief and Consumer Protection Act (EGRRCPA, S. 2155) effective May 2018. The CFPB's interpretive and procedural rule clarified partial exemptions by making the following clarifications:

- Only "closed-end mortgage loans" and "open-end lines of credit" that are otherwise reportable under Regulation C count toward the thresholds for the partial exemptions named in the Act.
- Permits the use of a unique, non-universal loan identifier for certain partially exempt transactions and includes parameters on what constitutes an allowable non-universal loan identifier.
- Clarifies that insured credit unions qualifying for a partial exemption may optionally report exempt data points so long as they report all data fields that the data point comprises. The rule identifies the seven data points that contain multiple data fields.

Georgia Credit Union Affiliates

InfoSight
Compliance eNEWSLETTER
February 4, 2019
Vol. 13, Issue 5
Created in partnership with the

Credit Union National Association

Compliance Video

Compliance Connection Video

In this video, League InfoSight CEO Glory LeDu talks about the highlights from the 4th Quarter of 2018 and the 1st Quarter of 2019.

When S.2155, the Economic Growth, Regulatory Relief, and Consumer Protection Act, passed in 2018 there was a lot to understand! Glory LeDu, League InfoSight CEO, provides Part 1 in this short video to break it down for you.

Compliance videos can be found on YouTube at the Compliance Connection channel, where they are generally updated quarterly.

- Rule includes a table identifying which 26 data points in Regulation C are covered by the partial exemptions named in the Act.

Additional Resources to help ensure compliance:

- HMDA Reporting - Getting it Right Guide
- FFIEC Resources for Filers
- CFPB Small Entity Compliance Guide
- FFIEC HMDA Examiner Transaction Testing Guidelines

HMDA Q & As
Q: Our credit union is still unsure if we are exempt from the Home Mortgage Disclosure Act. Can you provide clarification?
A: The credit union will be required to collect and report data under the Home Mortgage Disclosure Act (HMDA) if it is considered a financial institution under the rule. Now, remember the credit union is only subject to HMDA if it meets **ALL** of the following criteria listed below (which is the definition of a financial institution). *Also, note that when indicating the "preceding calendar year" and the "preceding December 31st" for this response we are talking about 2018 as the preceding calendar year and December 31, 2018 as the preceding December 31st.*

1. **Asset-Size Threshold.** For determining coverage and data collection in 2019, the credit union will need to compare their asset size threshold as of the preceding December 31st with the newly published threshold, which is $46 million in assets.
2. **Location Test.** In the preceding December 31st, the credit union had a branch or home office in a metropolitan statistical area (MSA).
3. **Loan Activity Test.** In the preceding calendar year, originated at least one home purchase loan or refinancing of a home purchase loan, secured by a first lien on a one- to four-unit dwelling.
4. **Federally Regulated/Insured Test.** The credit union is federally insured or regulated.
5. **Loan-Volume Threshold.** In each of the two preceding calendar years, the credit union originated at least 25 closed-end mortgage loans (not otherwise excluded) OR in each of the two preceding calendar years, originated at least 500 open-end lines of credit (not otherwise excluded).

If your credit union meets ALL these criteria, you will be required to collect and report HMDA data. What data you collect and report on and for what loans is going to be dependent on other criteria, including the amount of closed-end and open-end loans your credit union has originated.

Credit Union Compliance Help

Need a BSA, ACH, SAFE Act or website audit? GCUA has certified Compliance Specialists who can help. For scheduling and pricing information contact compliance@gcua.org.

Compliance Calendar

February 2019

February 18th
Presidents Day

Click here for upcom

Compliance Training

February 5, 2019
Right of Setoff on Deposit Accounts & Loans: Legal Issues
3:00 pm - 4:30 pm ET

February 6, 2019
C-Suite Series: CAMELS Rating for Executives
3:00 pm - 4:30 pm ET

February 7, 2019
ACH Specialist Series: ACH Tax Refund Exceptions, Posting & Liabilities
3:00 pm - 4:30 pm ET

February 12, 2019
Teller Training Series: Risks & Precautions for Endorsements & Other Negotiable Instruments
3:00 pm - 4:30 pm ET

February 13, 2019
Board Reporting Series: Board Secretary Procedural & Compliance Responsibilities

Q: My credit union qualifies for the partial exemption. However, we've been collecting all the data points since January 1st. Do we have to remove all the previous data points that are now not needed under the partial exemption from our loan application register?

A: Since the partial exemption only applies to data collected or reported on or after May 24, 2018, credit unions are permitted to voluntarily report data that is covered by a partial exemption. However, the Executive Summary does indicate that if the credit union qualifies for the partial exemption, they are not required to report in 2019 any data covered by the partial exemption. This gives the credit union two options: They can either scrub their data to remove any of the data points that are now covered by the partial exemption or they can leave the information that is currently on their loan application register (LAR) which would include all the previously required data points and voluntarily report that data in 2019. Click here (page 18) to view Table 1: Effect of the Acts Partial Exemptions on HMDA Data Points

Q: Why did the CFPB create requirements for a non-universal loan identifier? Do we have to use that identifier now?

A: When the original changes to HMDA became effective on January 1, 2018, one of the new data points that was required to be reported was a "Universal Loan Identifier" or "ULI." The ULI begins with a credit union's legal entity identifier (which many credit unions had to go out and obtain from a utility endorsed by the Global LEI Foundation). The additional components of the ULI could be made up of numbers, letters or a combination of both that was unique to the credit union and could not identify the applicant or borrower.

With the partial exemption becoming effective, the ULI was no longer a required data point! However, credit unions still need to provide information so that each loan and application they reported for HMDA purposes through their LAR was identifiable. This is important to facilitate efficient and orderly submission of data and communications between institutions, the CFPB and the other regulators. To do that, the CFPB had to define a non-universal loan identifier for those partially exempt loans or applications that do not need to report a ULI.

While the new requirements of a non-universal loan identifier are pretty similar to the universal loan identifier, except for including the credit unions legal entity identifier, credit unions should make sure they are complying with the new requirements if they qualify for a partial exemption. Credit unions are also permitted to continue reporting with a ULI.

3:00 pm - 4:30 pm ET

February 14, 2019
Prepaid Cards: Your Credit Union's Responsibilities Under the New Rules, Effective April 1, 2019
3:00 pm - 4:30 pm ET

February 19, 2019
Determining Cash Flow from Personal Tax Returns After 2018 Tax Reform Part 2: Schedules D, E & F
3:00 pm - 4:30 pm ET

February 20, 2019
Credit Analysis & Underwriting Series: Debt Service Coverage Calculations in Underwriting
3:00 pm - 4:30 pm ET

February 21, 2019
The New NIST Digital Identity Guidelines: Impact on Passwords, Security Questions & Account Lockouts
3:00 pm - 4:30 pm ET

February 25, 2019
Debit Card Chargebacks: Understanding Visa Claims Resolution
3:00 pm - 4:30 pm ET

February 27, 2019
ACH Specialist Series: ACH Dispute Resolution
3:00 pm - 4:30 pm ET

February 28, 2019
Flood Insurance Compliance Update & FAQs
3:00 pm - 4:30 pm ET

Q: If we originate less than 500 closed-end loans, does that mean that we are exempt from HMDA reporting under the new law?

A: NO! Keep in mind, the change within the Economic Growth, Regulatory Relief and Consumer Protection Act does not amend the definition of a Financial Institution within Regulation C. Credit unions that continue to meet the definition of a Financial Institution will still need to report HMDA data, but if they originate fewer than 500 closed-end loans, they will have fewer data points to report on. We are still waiting for the CFPB to update Regulation C to provide us with clear guidance on what data points those credit unions will be required to report on. If you missed it, here is the statement issued by the CFPB regarding the changes and the partial exemption.

BSA Training Opportunities through GCUA
Click here for details

Military Lending Act
The Military Lending Act amendments effective October 2016 continue to be a focus with examiners. The Rule expanded coverage of the prior regulation to include many non-mortgage related credit transactions covered by the Truth in Lending Act (TILA), as implemented by Regulation Z. It provides safe harbor methods for identifying borrowers covered by the Final Rule, prohibits the use of certain practices, and amends the content of the required disclosures. This rule also had new provisions about administrative enforcement, penalties and remedies. If your credit union provides consumer credit to active duty members, their family members or dependents, examiners will expect to see compliance with the MLA regulation by assessing your policy, procedures and the quality of your risk management systems.

Need to know more about how to comply? Click here.
Department of Defense FAQs

Regulation B Notification Requirements - Adverse Action Notices
Another area of examiner focus is Regulation B, notification to members following adverse action taken on consumer applications. Equal Credit Opportunity Act (ECOA) and Fair Credit Reporting Act (FCRA) are two federal laws that enforce the expectation that consumers and businesses applying for credit should receive a notice stating the reasons a creditor takes adverse action on an application or existing credit account. To concentrate on examiner focus, we will focus primarily on Reg B.

Regulation B defines adverse action as:

- A refusal to grant credit in substantially the amount or on substantially the terms requested in an application unless the creditor makes a counteroffer (to grant credit in a different amount or on other terms), and the applicant uses or expressly accepts the credit offered;
- A termination of an account or an unfavorable change in the terms of an account that does not affect all or substantially all of a class of the creditor's accounts; or

- A refusal to increase the amount of credit available to an applicant who has made an application for an increase.

To provide greater clarity about the definition, Regulation B also specifically describes what is not adverse action:

- A change in the terms of an account expressly agreed to by an applicant;
- Any action or forbearance relating to an account taken in connection with inactivity, default, or delinquency as to that account;
- A refusal or failure to authorize an account transaction at point of sale or loan except when the refusal is a termination or an unfavorable change in the terms of an account that does not affect all or substantially all a class of the creditor's accounts or when the refusal is a denial of an application for an increase in the amount of credit available under the account;
- A refusal to extend credit because applicable law prohibits the creditor from extending the credit requested; or
- A refusal to extend credit because the creditor does not offer the type of credit or credit plan requested.

Most often, Reg B notice requirements are triggered when adverse action is taken because of a credit application or an existing account. FCRA has different coverage rules, which means adverse action may be required under one law but not the other. When determining who should receive a notice, Reg B incorporates businesses as well as individuals. According to Reg B, if multiple applicants submit an application, only the primary applicant must be given notice, however the regulation does not prohibit delivery of an adverse action notice to each applicant.

These notices are designed to help provide transparency to the credit underwriting process and protect against potential credit discrimination by requiring creditors to explain why the action was taken. Creditors are allowed to use one combined notices to comply with the adverse action requirements of both laws, Regulation B provides model forms accordingly.

Timing Requirements for Consumer & Business

Creditor must notify the applicant of adverse action within:

- 30 days after receiving a complete credit application
- 30 days after receiving an incomplete credit application
- 30 days after acting on an existing credit account
- 90 days after making a counteroffer to an application for credit if the applicant does not accept the counteroffer

Common Notice Violations

Common Regulation B adverse action notification and timing errors are related to handling incomplete applications. Failure to identify an application as incomplete and, as such, fail to meet notice content and timing requirements.

A creditor has two options after receiving an incomplete application:

1. it can act on the application and notify the applicant according to Regulation B's standard notice requirements or
2. refrain from acting and notify the applicant that the application is incomplete.

If the creditor provides a notice of incompleteness, the notice must

1. be in writing,
2. detail the information needed to complete the application,
3. provide a reasonable deadline, and
4. state that the application will not be reviewed if the information is not received.

Regardless of which notice is provided, the notice must be provided within 30 days.

Content Requirements for Adverse Actions Notices

Notices should include the following disclosures:

- The creditor's name and address
- An ECOA antidiscrimination notice substantially similar to the one in 12 C.F.R. §1002.9(b) (1)
- The name and address of the creditor's primary regulator
- A statement of action taken by the creditor
- Either a statement of the specific reasons for the action taken or a disclosure of the applicant's right to a statement of specific reasons and the name, address, and telephone number of the person or office from which this information can be obtained

Common content violations

Regulation B adverse action errors involving content typically relate to the statement of specific reasons for the action taken. The regulation requires the statement to be specific and indicate the principal reason(s) for taking adverse action. Creditors should disclose up to four principal reasons; disclosure of more than four reasons is unlikely to be helpful to the applicant. Violations often involve inaccurate, ambiguous, or confusing statements of the principal reasons.

Overdraft Policies and Procedures

Examiners will also be reviewing your overdraft policies and procedures for Regulation E compliance. The term overdraft service applies to any service under which a credit union assesses a fee or charge on a consumer account for paying a transaction (including check or other item) when the consumer does not have sufficient funds in the account. If your credit union pays items for members through means other than overdraft protection involving transfers from another account held by the member such as a savings account, then you are required to have a policy and procedures in place. If you pay ATM and one-time debit card transactions, you must also show proof of adhering to opt-in requirements.

According to Reg E, a financial institution holding a consumer's account shall not assess a fee or charge on a

consumer's account for paying an ATM or one-time debit card transaction pursuant to the institution's overdraft service, unless the institution meets the following guidelines:

- Provides the consumer with a notice in writing, or if the consumer agrees, electronically, segregated from all other information, describing the institution's overdraft service;
- Provides a reasonable opportunity for the consumer to affirmatively consent, or opt in, to the service for ATM and one-time debit card transactions;
- Obtains the consumer's affirmative consent, or opt-in, to the institution's payment of ATM or one-time debit card transactions; and
- Provides the consumer with confirmation of the consumer's consent in writing, or if the consumer agrees, electronically, which includes a statement informing the consumer of the right to revoke such consent.

A credit union **cannot** condition payment of other overdrafts on consumer's affirmative consent as described below:

- Condition the payment of any overdrafts for checks, ACH transactions, and other types of transactions on the consumer affirmatively consenting to the institution's payment of ATM and one-time debit card transactions pursuant to the institution's overdraft service; or
- Decline to pay checks, ACH transactions, and other types of transactions that overdraw the consumer's account because the consumer has not affirmatively consented to the institution's overdraft service for ATM and one-time debit card transactions.

Your credit union is required to offer the same account terms, conditions, and features to members who do not affirmatively consent to the institution's overdraft service for ATM and one-time debit card transactions the same account terms, conditions and features that you provide to consumers who do affirmatively consent, except for the overdraft service for ATM and one-time debit card transactions.

The content and format of the opt-in notice shall be substantially similar to Model Form A-9 set forth in appendix A of Reg E. and may not contain any information not specified in or otherwise permitted as noted below:

- **Overdraft service.** A brief description of the financial institution's overdraft service and the types of transactions for which a fee or charge for paying an overdraft may be imposed, including ATM and one-time debit card transactions.
- **Fees imposed.** The dollar amount of any fees or charges assessed by the financial institution for paying an ATM or one-time debit card transaction pursuant to the institution's overdraft service, including any daily or other overdraft fees. If the amount of the fee is determined based on the number of times the consumer has overdrawn the account, the amount of the overdraft, or other factors, the institution must disclose the maximum fee that may be imposed.
- **Limits on fees charged.** The maximum number of overdraft fees or charges that may be assessed per day, or, if applicable, that there is no limit.
- **Disclosure of opt-in right.** An explanation of the consumer's right to affirmatively consent to the financial institution's payment of overdrafts for ATM and one-time debit card transactions pursuant to the institution's overdraft service, including the methods by which the consumer may consent to the service; and

- **Alternative plans for covering overdrafts.** If the institution offers a line of credit subject to Regulation Z (12 CFR part 1026) or a service that transfers funds from another account of the consumer held at the institution to cover overdrafts, the institution must state that fact. An institution may, but is not required to, list additional alternatives for the payment of overdrafts.
- **Permitted modifications and additional content.** If applicable, the institution may modify the content required by §1005.17(d) to indicate that the consumer has the right to opt into, or opt out of, the payment of overdrafts under the institution's overdraft service for other types of transactions, such as checks, ACH transactions, or automatic bill payments; to provide a means for the consumer to exercise this choice; and to disclose the associated returned item fee and that additional merchant fees may apply. The institution may also disclose the consumer's right to revoke consent. For notices provided to consumers who have opened accounts prior to July 1, 2010, the financial institution may describe the institution's overdraft service with respect to ATM and one-time debit card transactions with a statement such as "After August 15, 2010, we will not authorize and pay overdrafts for the following types of transactions unless you ask us to (see below)."
- **Joint relationships.** If two or more consumers jointly hold an account, the financial institution shall treat the affirmative consent of any of the joint consumers as affirmative consent for that account. Similarly, the financial institution shall treat a revocation of affirmative consent by any of the joint consumers as revocation of consent for that account.
- **Continuing right to opt in or to revoke the opt-in.** A consumer may affirmatively consent to the financial institution's overdraft service at any time in the manner described in the notice required by paragraph (b)(1)(i) of this section. A consumer may also revoke consent at any time in the manner made available to the consumer for providing consent. A financial institution must implement a consumer's revocation of consent as soon as reasonably practicable.
- **Duration and revocation of opt-in.** A consumer's affirmative consent to the institution's overdraft service is effective until revoked by the consumer, or unless the financial institution terminates the service.

Your CU Should Know

CUSO ‘Reaffirmation' Opens for 60-Day Window
Credit union service organizations (CUSOs) have 60 days - from today to March 31 - to complete their annual, required reaffirmations with the CUSO Registry maintained by the NCUA. Launched in 2016, the CUSO Registry is part of the CUSO rule approved by the NCUA Board in November 2013. CUSOs are required to report financial and regulatory information to NCUA on an annual basis through the registry. A searchable version of the registry is available online.

Requirements for CUSO registration were detailed for credit unions in a 2016 NCUA Letter to Credit Unions. The letter notes that federally insured credit unions are required to enter into written agreements with any CUSOs they make loans to or invest in.

NCUA CUSO Registry (login required)
NCUA Letter 16-CU-02

Bureau Publishes Inflation Adjustments
The CFPB has published three previously announced rules making annual inflation adjustments.

- Civil penalty inflation adjustments [84 FR 517], effective January 31, 2019, for violations occurring on or after November 2, 2015.
- HMDA

  (Regulation C) adjustment to asset-size exemption threshold [84 FR 513], effective January 31, 2019, but applicable as of January 1, 2019.

- Amendments to Regulation V [84 FR 515] adding a section establishing a maximum allowable charge for disclosures by a consumer reporting agency to a consumer pursuant to FCRA section 609. The Bureau is also amending Regulation V to add an appendix setting forth the statutory requirements for determining the maximum allowable charge; announcing the maximum charge for 2019; and preserving a list of historical maximum allowable charges. The rule is effective January 31, 2019, and applicable as of January 1, 2019.

Home Mortgage Disclosure (Regulation C) Adjustment to Asset-Size Exemption Threshold
The Bureau of Consumer Financial Protection (Bureau) is amending the official commentary that interprets the requirements of the Bureau's Regulation C (Home Mortgage Disclosure) to reflect the asset-size exemption threshold for banks, savings associations, and credit unions based on the annual percentage change in the average of the Consumer Price Index for Urban Wage Earners and Clerical Workers (CPI-W). Based on the 2.6 percent increase in the average of the CPI-W for the 12-month period ending in November 2018, the exemption threshold is adjusted to increase to $46 million from $45 million. Therefore, banks, savings associations, and credit unions with assets of $46 million or less as of December 31, 2018, are exempt from collecting data in 2019.

CFPB Updates Reportable HMDA Data chart for 2019
The Bureau has published the **Reportable HMDA Data: A Regulatory and Reporting Overview Reference Chart for Data Collected in 2019**. The chart is intended to be used as a reference tool for data points required to be collected, recorded, and reported under Regulation C.

Bureau Releases Report on Servicemember Complaints
The CFPB has posted a Bureau Blog entry announcing the release of the sixth Annual Report from the Bureau's Office of Servicemember Affairs (OSA) highlighting issues and emerging trends facing servicemembers, veterans, and military families. The annual review allows the CFPB to highlight and address critical issues and emerging trends facing the military community and informs the Bureau's efforts to protect military consumers.

The OSA provides service to the military community by highlighting issues like abuses of the military allotment system, aggressive marketing of refinance offers to veteran homeowners, and full explanations of servicemembers' rights under the Servicemember Civil Relief Act (SCRA). This year's Annual Report describes emerging servicemember issues in the financial marketplace such as:

- Medical, telecommunications and VA debts on servicemembers' credit reports
- Student loan servicing obstacles

- Automobile add-on products in the car buying process

Fed Seeking Payment Improvement Working Group Members
The Federal Reserve's Fed Payments Improvement team is reaching out to the payments industry for industry participants for two work groups to become involved with Federal Reserve executives in focusing on payment fraud.

- The Fraud Definitions Work Group will work to identify where existing fraud definitions may be leveraged as well as where new or changed definitions would be helpful, develop a recommended fraud classification model to better understand key data points in payment fraud, and propose a roadmap to encourage broad industry adoption of this recommended model. It will involve 20-30 industry participants selected by the Fed who have in-depth expertise that includes, but is not limited to, fraud prevention, payments risk mitigation, and ACH, wire and check operations including customer servicing aspects.
- The Fraud Definitions Community Interest Group is open to industry stakeholders interested in following and consulting on Fraud Definitions Work Group deliverables. This group will receive regular updates on the Fraud Definitions Work Group's progress and be notified of opportunities to provide feedback on work group deliverables.

Additional information can be found on the Fed Payments Improvement webpage on the new work groups.

Tax Season Spotlight

Tax Season Direct Deposit Refunds
Credit unions will soon begin seeing direct deposited tax refunds hitting your members' accounts. According to the IRS more than four out of five tax returns will be prepared electronically.

The IRS has shared the following reminders to taxpayers regarding direct deposited tax refunds:

- Refunds can be split into as many as three separate accounts. For example, a checking, a savings, and a retirement account.
- Refunds should only be directly deposited into accounts that are in the taxpayer's own name, their spouse's name, or both if it's a joint account.
- Refunds should not be direct deposited into an account in a return preparer's name.

The IRS offers the following scenarios for when a taxpayer enters an incorrect routing or account number:

- The taxpayer omits a digit in the account or routing number of an account and the number doesn't pass the IRS's validation check. In this case, the IRS will send a paper check for the entire refund instead of a direct deposit.
- The taxpayer incorrectly enters an account or routing number and the number passes the IRS's validation check, but the credit union rejects the deposit and returns the deposit to the IRS. The IRS will issue a paper check for that portion of the refund once received.
- The taxpayer incorrectly enters an account or routing number that belongs to someone else and the credit union accepts the deposit. The taxpayer must work directly with the credit union to recover your funds.

- The taxpayer requested a Refund Anticipation Loan (RAL) or Refund Anticipation Check (RAC) through their preparer or preparation software. Usually this occurs when they authorize the fee for preparation to be taken from their refund. Even if they didn't request a direct deposit, these types of refunds are directly deposited into the preparer's financial institution, so the taxpayer should contact that institution for resolution.
- If a taxpayer contacts the credit union regarding a missing refund and doesn't hear something back within two weeks, the taxpayer can file Form 3911, Taxpayer Statement Regarding Refund to initiate a trace. This allows the IRS to contact the credit union on the taxpayer's behalf to attempt recovery of the refund. Financial institutions are allowed up to 90 days from the date of the initial trace to respond to the IRS request for information.
- If funds aren't available or the credit union refuses to return the funds, the IRS cannot compel the credit union to do so. The case may then become a civil matter between the taxpayer and the credit union and/or the owner of the account into which the funds were deposited.

Pending Regulatory Comment Calls

For more information regarding these proposals, please follow the links below:

Issues	Comment Period Deadline	Agency	CUNA Staff Contact
Availability of Funds and Collection of Checks (Reg CC)	Feb. 8, 2019	BCFP	Alexander Monterrubio
Policy on No-Action Letters and the BCFP Product Sandbox	Feb. 11, 2019	BCFP	Alexander Monterrubio
Validation and Approval of Credit Score Models	Mar. 21, 2019	BCFP	Mitria Wilson

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The CUNA Advocacy Update keeps you on top of the most important changes in Washington for credit unions - and what CUNA is doing to monitor, analyze, and influence government agencies and federal law. You can view the current report and past reports from the archive.

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Need a BSA, ACH or Website review? Email compliance@gcua.org.