

Title	Subtitle	Month	Year
COVID coughs up and update		August	2022
FCRA is on the front burner		August	2022
What's new with Reg B? – A Lot!		July	2022
Electronic liens		July	2022
Please help us to help you (Part 2)		June	2022
Oklahoma Mini-TCPA		June	2022
Tit. 47 O.S. § 1110	Perfection of Security Interest	June	2022
Tit. 47 O.S. § 427A/ § 1105A	Electronic Filing of Liens, etc.	June	2022
Changes to UCCC Amounts Effective 7/1/22		June	2022
Help us help you		May	2022
Lender credits on the TRID closing disclosure		May	2022
MLA and GAP		May	2022
Overdraft fees are not interest		May	2022
NACHA warranties and old unauthorized ACH debits		April	2022
P2P complaints		April	2022
Fair banking		April	2022
The Beneficial Ownership Rule hasn't gone away		March	2022
UDA(A)P is becoming all the rage!		March	2022
Reg E FAQs - Part II		February	2022
FDCPA Regulations - Part II		January	2022
CFPB Reg E FAQs - Part I		January	2022
2022 to-dos today		December	2021
New Year, new rule	Computer-security incident notification	December	2021
Foreclosure forbearance reminder		December	2021
Don't ignore FDCPA regulations		November	2021
New Stuff on Legal Links		November	2021
Regulatory priorities		October	2021
Consumer complaints		October	2021
2021 OK legistion - Part III	OK Banking Code	October	2021
	Judgment liens	October	2021
	Motor vehicles	October	2021

Title	Subtitle	Month	Year
	Tax	October	2021
	Oklahoma Power of Attorney Act – Part 2	October	2021
	Oklahoma Consumer Credit Code § 3-508A	October	2021
	Uniform Interstate Depositions and Discovery Act	October	2021
2021 Oklahoma legislation - Part II		September	2021
	Oklahoma Power of Attorney Act – Part 1	September	2021
Reg Z's business day definitions		August	2021
Advance Child Tax Credits and closed accounts		August	2021
2021 Oklahoma legislation - Part I		August	2021
	§ 901 – POD beneficiaries	August	2021
	§ 906 – Transfer of deposits or contents of safe deposit boxes to heirs.	August	2021
	§ 909 - Powers of Authorized Signer — Form for Additional Powers	August	2021
Vacations - Required or recommended		July	2021
CFPB to mortgage servicers: “Hear us NOW”		June	2021
Changes in UCCC amounts effective July 1, 2021		June	2021
Dot your i’s, cross your t’s (employer workplace notice rules)		May	2021
Foreclosures and evictions after a pandemic		May	2021
Third round of stimulus payments (EIP3)		April	2021
Reg B has expanded: What you need to do		April	2021
UDAAP U-turn		April	2021
More reasons to watch the Bureau		April	2021
		April	2021
Happy Anniversary! It's 2020.1! (Another look at COVID-19 workplace and vaccination policies)		March	2021
	Inquiring about disability and medical exams	March	2021
	Confidentiality	March	2021
	New Hires	March	2021
	Reasonable Accommodations	March	2021

Title	Subtitle	Month	Year
	Discrimination in the Workplace	March	2021
	Vaccinations	March	2021
Closing accounts for undesirable customers		February	2021
Military lending rules have teeth		February	2021
Second round of stimulus payments		January	2021
Accepting OK Real ID receipts		January	2021
Special purpose credit programs		January	2021
BSA revisions		January	2021
Systemic overdraft problems		December	2020
Resolving escrow shortages and deficiencies		December	2020
An update on the Payday Lending Rule		December	2020
FAQs on RESPA Section 8		November	2020
The year is nearly over – Loose ends		November	2020
Contracts for deed		October	2020
Reg D		October	2020
Flood program extended		October	2020
TRID timing requirement waivers		October	2020
SCRA is still in the news		October	2020
Advertise this way, everyone is doing it!		September	2020
Trust documents		September	2020
Fair Lending—in the News and on Your Radar		August	2020
	Fair lending and HMDA	August	2020
	Fair lending and CRA	August	2020
	Paycheck Protection Program	August	2020
	Bank of America – disability	August	2020
	Townstone – redlining	August	2020
	Fair servicing	August	2020
	The CFPB's RFI	August	2020
Mortgage maturity date, 46 O.S. § 301		July	2020
Appraisal update		July	2020
Reg E error claims and ‘unjust enrichment’		July	2020

Title	Subtitle	Month	Year
HMDA thresholds		July	2020
More on the death of savings transfer limits		July	2020
Corona virus compliance changes		June	2020
	Mortgage servicing rules	June	2020
	Fair credit reporting	June	2020
	Regs E, DD, and Z - Working with customers	June	2020
	Statement for credit card issuers and open-end lenders	June	2020
	Flexibility regarding deposit accounts	June	2020
	Open-end (not home-secured) loans	June	2020
Changes in UCCC amounts effective 7/1/20		June	2020
	Increased late fee	June	2020
	§3-508B loans	June	2020
	§3-511 loans	June	2020
	Dealer paper "no deficiency" amount	June	2020
Work after the corona virus		May	2020
Information on Oklahoma campaign accounts		May	2020
Are savings transfer limits dead?		May	2020
Coronavirus and Assisting Customers		April	2020
	Modify Policies—COVID-19 addendums	April	2020
	Assisting borrowers	April	2020
	New loans	April	2020
	Loans past due of about to be	April	2020
	Regulatory reporting	April	2020
	Limits on fee, penalty and interest	April	2020
	Credit bureau reporting	April	2020
Coronavirus and Banking Coronavirus and Banking	Management's Actions	March	2020
	<i>Update</i>	March	2020
	<i>Education</i>	March	2020
	<i>Responsibilities</i>	March	2020
	<i>Travel</i>	March	2020

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	<i>Security</i>	March	2020
	<i>IT</i>	March	2020
	<i>Vendors</i>	March	2020
Military lending update		March	2020
Perfecting a security interest on a trailer		March	2020
Tax season information in <i>Legal Briefs</i>		March	2020
Index to Legal Briefs now online		February	2020
“Abusive” UDAAP Update – Policy Statement		February	2020
Compliance Aids – Policy Statement		February	2020
SECURE Act and IRAs		February	2020
LIBOR – Transition Plans		February	2020
HMDA Guides		February	2020
New Home Buyer Savings Account		January	2020
CFPB Supervisory Highlights		January	2020
	UDAAP & GAP	January	2020
	Credit cards	January	2020
	Credit reporting (furnishing)	January	2020
These OREOs are no treat!		December	2019
Privacy: It’s for bank info, too		December	2019
Managing returns of duplicate payments		December	2019
	Returns by the midnight deadline	December	2019
	After the midnight deadline	December	2019
	The UCC and checks or images that are duplicate payments	December	2019
	Returning checks and images that are duplicate payments	December	2019
Medical marijuana state question 788 and banking issues		November	2019
	Background	November	2019
	Oklahoma	November	2019
	Federal Law	November	2019

Title	Subtitle	Month	Year
	Hemp, CBD	November	2019
Residential appraisal threshold raised		October	2019
	Agencies issue joint rule	October	2019
	Important new definition	October	2019
	Effective dates	October	2019
2019 Oklahoma legislation		October	2019
	Title 18 – Corporations	October	2019
	Title 16 – Conveyances	October	2019
	Title 12A – Uniform Commercial Code – Article 15	October	2019
	Title 12 – Civil Procedure	October	2019
	Title 68 – Public Health and Safety	October	2019
	Title 28 – Fees	October	2019
Watch for new CTR filing instructions		October	2019
HEMP, CBD		September	2019
Do cashier’s checks expire?		September	2019
Mandatory vacation for bank employees		September	2019
Inform your borrower (Post-confirmation rate reduction)		September	2019
	Post-consummation rate reduction	September	2019
	Disclosing the cost of credit	September	2019
	Refinancing or modification?	September	2019
	Audit concerns	September	2019
	The fair lending problem	September	2019
	A \$25 million penalty	September	2019
Two regulation amendments, two errors		September	2019
	A Reg CC comedy of errors	September	2019
	A ‘High Cost’ error in Regulation Z	September	2019
Amendments to Title 47		August	2019
EGRRCPA Update – Part 2		August	2019
How to Write Suspicious Activity Reports (SARs)		July	2019
	Introduction	July	2019

Title	Subtitle	Month	Year
	Overview	July	2019
	What to include	July	2019
	Organization of SAR narrative	July	2019
	General good practices	July	2019
	Things not to say	July	2019
	Conclusion	July	2019
EGRRCPA Status Update (Part 1)		July	2019
FDCPA		June	2019
New stuff!		June	2019
	OBA Legal/Compliance team's new intern	June	2019
	New OBA Legal Links content	June	2019
Changes in UCCC amounts effective 7/1/19		June	2019
	Increased Late Fee	June	2019
	§ 3-508B Loans	June	2019
	§ 3-511 Loans	June	2019
	Dealer Paper "No Deficiency" Amount	June	2019
CFPB's Spring 2019 Regulatory Agenda		June	2019
What to say and not say		May	2019
Dead beneficiaries		May	2019
Dead joint tenants		May	2019
Funds belong to an estate		May	2019
Watch your fees		May	2019
Complaints		April	2019
MLA SNAFU		April	2019
Convenience fees on loan payments		April	2019
HMDA Reference Chart		March	2019
Flood Update		March	2019
TILA-RESPA FAQs		February	2019
Service member complaints		February	2019
Authorized signers		February	2019
2nd Amendment Auditors		February	2019

Title	Subtitle	Month	Year
New year, new SAR		January	2019
	Overview	January	2019
	Safe Harbor	January	2019
	Confidentiality	January	2019
	Prohibition on Disclosures by Financial Institutions	January	2019
	What may be shared	January	2019
	Prohibition on Disclosures by Government Authorities	January	2019
Required year-end housekeeping		January	2019
	Reg E § 1005.8	January	2019
	Reg P § 1016.5	January	2019
	If you still need to provide annual notices	January	2019
	BSA annual certifications	January	2019
	OFAC reporting	January	2019
	IRAs, IRS Notice 2002-27	January	2019
	Reg Z thresholds and updates	January	2019
	Annual escrow statements § 1024.17	January	2019
	Fair Credit Reporting Act – Affiliate marketing opt-out § 1022.27(c)	January	2019
	Regulation O, Annual Resolution §§ 215.4, 215.8	January	2019
	Reg BB (CRA), content and availability of public file § 228.43	January	2019
	HMDA and CRA notices and recordkeeping	January	2019
	Training	January	2019
	Security, Annual Report to the Board of Directors	January	2019
	Information Security Program part of GLBA	January	2019
	Annual MLO Registration § 1007.102	January	2019
	Miscellaneous	January	2019
FEMA NFIP snafu		January	2019
Residential appraisal threshold unchanged (yet)		January	2019
IOLTA accounts		December	2018



Title	Subtitle	Month	Year
SCRA – What not to do		December	2018
Privacy – Reg. P update		December	2018
Notes on beneficial ownership		December	2018
Certificates of deposit		December	2018
Loans and lines of credit		December	2018
Safe deposit box rentals		December	2018
Estate accounts		December	2018
Single-member LLCs		December	2018
Revocable trusts deposit insurance		November	2018
	The general rule	November	2018
	Formal and informal trusts	November	2018
	Aggregation	November	2018
	Exception to the general rule	November	2018
	Who can be a beneficiary	November	2018
	EDIE	November	2018
Complaints update		November	2018
The loan estimate and “no cost” loans		November	2018
Avoiding the lender credits ‘lock-in’		November	2018
UTMA accounts		October	2018
Loans to minors		October	2018
SCRA update		October	2018
	Recent SCRA enforcement action	October	2018
FCRA credit freeze update		October	2018
Educational loans		October	2018
	Let’s consider an example	October	2018
	An example with the opposite result	October	2018
Contracts for necessities		October	2018
Emancipation		October	2018
Deposit accounts for minors		September	2018
	Minor’s legal capacity to contract	September	2018
	Minor as sole owner	September	2018

Title	Subtitle	Month	Year
	Joint with minor	September	2018
HMDA filing update for small reporters		September	2018
Disqualification for exemption by CRA ratings		September	2018
Effective Dates		September	2018
FinCEN exemptive relief ending		August	2018
	Affected accounts	August	2018
	What banks should be doing now	August	2018
	More about that statement	August	2018
	Keep alert for developments	August	2018
UDAAP – The long-term risk		August	2018
	Marklebank	August	2018
	Community Trust Bank	August	2018
Speaking of UDAAP: TCF overdrafts update		August	2018
Voicemail, phone call, and email etiquette		August	2018
Loans to candidate campaigns		August	2018
	Permissible Loans	August	2018
Reefer madness		July	2018
	CBD Oil	July	2018
Update: campaign committee, PAC and political party accounts		July	2018
	All accounts need an EIN	July	2018
	Authorized signers/debit cards	July	2018
More on the Beneficial Ownership Rule		July	2018
	FinCEN's temporary 'exceptive' relief	July	2018
	Entity as trustee of owner	July	2018
	Estates as customers	July	2018
	Estate as owner of a legal entity customer	July	2018
Policies – Part 2		July	2018
	Policies lists	July	2018
	Writing and maintaining policies	July	2018
EGRRCPA and HMDA		July	2018

Title	Subtitle	Month	Year
	What you should be doing now	July	2018
AML/BSA Q&As		July	2018
	CTRs	July	2018
	SARs	July	2018
Deregulation is a reality		June	2018
Consumer loan dollar amounts adjust July 1		June	2018
	Increased Late Fee	June	2018
	3-508B Loans	June	2018
	3-511 Loans	June	2018
	Dealer Paper “No Deficiency” Amount	June	2018
Beneficial ownership rules update		May	2018
	Accounts covered	May	2018
	New account	May	2018
	Legal entity customer	May	2018
	Beneficial owner	May	2018
	Two-part process	May	2018
	Timing	May	2018
	Form, format and content of certification	May	2018
Policies		May	2018
Appraisals		May	2018
Watch that tax advice!		April	2018
Credit reports are changing again		April	2018
Telephone Consumer Protection Act – Update		April	2018
Sellers’ cost on borrowers’ closing disclosures		April	2018
OBA website update, <i>Legal Briefs</i> and Legal Links		March	2018
	Deceased customers	March	2018
	Guardians, conservators	March	2018
	Trusts	March	2018
Without the App, you can’t comply with HMDA		March	2018
	Prevention is better than a cure	March	2018
A Revised USA PATRIOT Act/CIP Sign?		March	2018

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HMDA Signage Correction		March	2018
Spirit and Intent, SCRA and BMW		March	2018
The Beneficial Ownership Rule		March	2018
	Questions and Answers from the Top Gun Conference	March	2018
UBO: How low do you go?		March	2018
"I received a child support levy..."		February	2018
	First things first	February	2018
	<i>Where are the Oklahoma child support levy statutes?</i>	February	2018
	<i>Who issued the child support levy?</i>	February	2018
	Continuing levies	February	2018
	Remitting the funds	February	2018
	Multiple levies	February	2018
	Check cashing	February	2018
Tax Refund Checks		February	2018
The ADA and the WWW		February	2018
Prepaid Accounts Rule Amended and Delayed		February	2018
	Issuers get another year for implementation	February	2018
Payday Lending Rule Likely to be Rescinded or Trimmed		February	2018
Deceased customer accounts		January	2018
	Funeral expenses	January	2018
	Offset and deceased customer	January	2018
Don't sweat the HUD-SCRA expiration, part 2		January	2018
Military Lending Act Guidance Update		January	2018
Managing risk in mobile deposits (Revised)		January	2018
Managing risk in mobile deposits (Removed for error)		December	2017
The statement exemption for charged-off loans		December	2017
	Making sure you qualify	December	2017

Title	Subtitle	Month	Year
Don't sweat the HUD-SCRA expiration		December	2017
HMDA notices		December	2017
Abundance of caution"		December	2017
"Legalese" for non-lawyers – Part II		December	2017
	Ante	December	2017
	Bona fide	December	2017
	Caveat	December	2017
	Codicil	December	2017
	Common law	December	2017
	Et al	December	2017
	Inter	December	2017
	Intra vires and ultra vires	December	2017
	Jurat	December	2017
	Lis pendens	December	2017
	Per curiam	December	2017
	Pro hac vice	December	2017
	Per capita and per stirpes	December	2017
"Legalese" for non-lawyers		November	2017
	Pet Peeves	November	2017
	Probate legal terms	November	2017
	Testamentary trust	November	2017
	Affidavit	November	2017
	Alter ego	November	2017
	Amicus curiae	November	2017
	De facto	November	2017
	Duces tecum	November	2017
	Fiduciary	November	2017
	Guardian ad litem	November	2017
	In personam	November	2017
Required year-end housekeeping		November	2017
	Reg E § 1005.8	November	2017

Title	Subtitle	Month	Year
	Reg P § 1016.5	November	2017
	BSA annual certifications	November	2017
	OFAC reporting	November	2017
	IRAs, IRS Notice 2002-27	November	2017
	Reg Z thresholds and updates	November	2017
	Annual escrow statements § 1024.17	November	2017
	Fair Credit Reporting Act – Affiliate marketing opt-out § 1022.27(c)	November	2017
	Fair Credit Reporting Act – FACTA red flags report	November	2017
	Regulation O, Annual Resolution §§ 215.4, 215.8	November	2017
	Reg BB (CRA), content and availability of public file § 228.43	November	2017
	HMDA and CRA notices and recordkeeping	November	2017
	Training	November	2017
	Security, Annual Report to the Board of Directors	November	2017
	Information Security Program part of GLBA	November	2017
	Annual MLO Registration § 1007.102	November	2017
	Miscellaneous	November	2017
2017 Oklahoma Statutory Amendments		October	2017
	Civil Procedure	October	2017
	Deceased customers	October	2017
	Liens	October	2017
Real Estate and Money Laundering		October	2017
FinCEN Revises Beneficial Ownership Certification		October	2017
Consumer Liability Under Regulation E		October	2017
	Error claims and consumer liability	October	2017
	Example	October	2017
	Timeliness of Sarah’s claim	October	2017
	Calculating Sarah’s liability	October	2017
Lessons from the American Express settlement		September	2017
CFPB’s 2017 HMDA Rule amendments		September	2017

Title	Subtitle	Month	Year
	The HELOC reporting threshold	September	2017
	Clarified terms	September	2017
	Home improvement loans and mixed-use property	September	2017
	Income	September	2017
	Reporting demographic information	September	2017
Forced-placement of flood insurance, with a twist		September	2017
Visa zero liability update		September	2017
"I received guardianship documents..."		August	2017
	First things first	August	2017
	Understanding guardianship orders	August	2017
Thoughts on the 120-day foreclosure waiting period		August	2017
Servicing Rule amendments		August	2017
One more thought on the 120-day rule		August	2017
"I received a garnishment..."		July	2017
	First things first	July	2017
	What court issued the garnishment?	July	2017
	Who is the judgment debtor?	July	2017
	What type of garnishment is it?	July	2017
	Name issues	July	2017
	The TIN doesn't match the one the bank has	July	2017
	Other situations.	July	2017
	The creditor sent the wrong forms or did not include a required form	July	2017
	The garnishment summons was sent to a branch rather than the main bank	July	2017
	The person who handles our garnishments was out or had left for the day	July	2017
	Claims for exemption on behalf of the judgment debtor — IRA	July	2017
Are annual privacy notices still required?		July	2017

Title	Subtitle	Month	Year
	Does your bank qualify for the exception?	July	2017
	When will you have to send an updated notice?	July	2017
Proposed changes to Prepaid Rule		July	2017
	Error resolution and limited liability	July	2017
	Credit card accounts linked to prepaid accounts.	July	2017
	Streamlining pre-acquisition disclosures	July	2017
	Submission of agreements to Bureau	July	2017
	Effective date and early compliance	July	2017
CFPB “special edition” on complaints		July	2017
Will the CFPB get SCRA enforcement authority?		July	2017
“Debt collector” gets a refined definition		July	2017
Consumer loan dollar amounts adjust July 1		June	2017
	Increased Late Fee	June	2017
	§ 3-508B Loans	June	2017
	§ 3-511 Loans	June	2017
	Dealer Paper “No Deficiency” Amount	June	2017
TCPA compliance for certain alerts		June	2017
	The TCPA	June	2017
	FCC Declaratory Ruling and Order 15-72	June	2017
	Exempted categories of messages	June	2017
	Conditions for exemption	June	2017
	Reassigned cell phone numbers and liability	June	2017
‘New and improved’ credit reports coming soon		June	2017
Amendments to Reg CC – Finally!	Fewer changes than hoped for	June	2017
	Effective date and waiting for the other shoe	June	2017
Complaints – What’s your status quo?		May	2017
	Annual Report Overview	May	2017
	Debt collection	May	2017
	Credit Reporting	May	2017
	Mortgage Loans	May	2017
	Bank accounts	May	2017



Title	Subtitle	Month	Year
	Credit cards	May	2017
	Student loans	May	2017
	Consumer loans	May	2017
	Summary	May	2017
Your Corporate Compliance Program		May	2017
	Overview	May	2017
	Penalties/Effects	May	2017
	Corrective Actions	May	2017
Prepaid Accounts Rule Delayed		May	2017
	Changes may also be made	May	2017
HMDA Rule Changes Proposed		May	2017
Deceased Customer Accounts		April	2017
Oklahoma Interstate Succession Laws Chart		April	2017
Blunder Report		March	2017
	A Visit to the Bank of Blunders (Operations)	March	2017
	A Visit to the Bank of Blunders (Lending)	March	2017
Labor's Fiduciary Rule Likely Delayed		March	2017
	Request for comments on proposed delay	March	2017
Bank of Blunders 2017		February	2017
	A Visit to the Bank of Blunders (Operations)	February	2017
	A Visit to the Bank of Blunders (Lending)	February	2017
Updated Lobby Signage		February	2017
Deregulation?		February	2017
Penalty caps increasing, again		February	2017
Annual adjustment for 2017		February	2017
Where to find the current caps		February	2017
Selected examples		February	2017
Penalty Caps Increasing, Again		February	2017
Unfinished Business		January	2017
	Reg P § 1016.5	January	2017
	Reg E § 1005.8	January	2017

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	BSA Annual Certifications	January	2017
	OFAC	January	2017
	IRAs, IRS Notice 2002-27	January	2017
	Reg Z and C Thresholds and Updates	January	2017
	Annual Escrow Statements § 1024.17	January	2017
	Fair Credit Reporting Act – Affiliate Marketing Opt-Out § 1022.27(c)	January	2017
	Fair Credit Reporting Act – FACTA Red Flags Report	January	2017
	Regulation O, Annual Resolution §§ 215.4, 215.8	January	2017
	Reg BB (CRA), Content and availability of Public File § 228.43	January	2017
	HMDA and CRA Notices and Recordkeeping	January	2017
	NACHA ACH Audit	January	2017
	Vendor Due Diligence	January	2017
	Holidays	January	2017
	Training	January	2017
	Security, Annual Report to the Board of Directors § 208.61	January	2017
	Information Security Program part of GLBA	January	2017
	Annual MLO Registration § 1007.102	January	2017
New Business		January	2017
DOL's Overtime Rule Blocked		December	2016
Reg Z, Reg M Thresholds		December	2016
Form W-9		December	2016
	Purposes of the W-9	December	2016
	Information required on the W-9	December	2016
	<i>Sole proprietorship</i>	December	2016
	<i>Disregarded Entity – Grantor Trust not filing Form 1041 or optional Form 1099</i>	December	2016
	<i>Disregarded Entity – Sole member LLC</i>	December	2016
	<i>Multi-member LLCs.</i>	December	2016

Title	Subtitle	Month	Year
	<i>Corporations</i>	December	2016
	Tax treatment election	December	2016
Questions & Answers		December	2016
	Who can release a mortgage	December	2016
	Must the spouse sign the mortgage secured by commercial real estate?	December	2016
	Waiver of homestead	December	2016
	Recitation of marital status	December	2016
	Purchase, non-borrowing spouse not in title	December	2016
	Name discrepancy	December	2016
More on the OK Garnishment Fee		November	2016
	New forms	November	2016
	Expected issues and solutions	November	2016
Next up, the MLA inspection		November	2016
Mortgage servicing rules update		November	2016
	Both Regulations X and Z affected	November	2016
	Effective dates	November	2016
Borrower's principal residence		November	2016
Definition of "delinquency"		November	2016
Force-placed insurance		November	2016
Evaluating loss mitigation applications		November	2016
Early intervention – live contact		November	2016
Early intervention – written notice		November	2016
Successors in interest		November	2016
Consumers in bankruptcy		November	2016
More on the effective dates		November	2016
2016 Oklahoma Statutory Amendments		October	2016
	Banking Code	October	2016
	Savings and Loan Code	October	2016
	Garnishments	October	2016
	Small Estate Affidavit – Probate Code	October	2016

Title	Subtitle	Month	Year
	Guardian and Ward	October	2016
	Eminent Domain, Mortgagee Liability	October	2016
	Title 58 Small Estate Affidavits.	October	2016
Are Your Forms Files Up to Date?		October	2016
	Changes to the Flood Form	October	2016
	Changes to the URLA	October	2016
MLA Guidance is Here!		September	2016
ODFI Warranty Risk under NACHA Rules		September	2016
Unclaimed property and safe deposit boxes		August	2016
Rep payee accounts		August	2016
	Household account exception	August	2016
	Exception for showing a beneficiary's ownership of funds	August	2016
Proposed TRID Rule Changes		August	2016
Your questions: our answers		August	2016
Bureau to implement GLBA privacy notice relief		July	2016
Everyone's tweaking their CMPs	FAST Act provision gets CFPB action	July	2016
Using enforcement actions		July	2016
	How do you approach the task of keeping your bank in compliance?	July	2016
	We can derive incredibly useful guidance from enforcement actions	July	2016
"Loans" to counties, schools, and municipalities		July	2016
Is it a refi?		June	2016
U3C: No change in late fee, dollar amounts		June	2016
	Same Day ACH	June	2016
	Testing	June	2016
	Modified mid-day FedForward deposit options	June	2016
	Changes to FDIC's Summary of Deposits survey	June	2016
Operational Odds and Ends		June	2016
Updated plans from the Bureau		June	2016

Title	Subtitle	Month	Year
	Coming this summer	June	2016
	Over the horizon	June	2016
Sudden Overtime Changes		June	2016
	Overview	June	2016
	Overtime Basics	June	2016
	Overtime Options	June	2016
	Change Management	June	2016
Landscape for Balloon QMs has changed		April	2016
Corporations and LLCs – Part II		April	2016
	Death or incapacity of the corporation's sole shareholder.	April	2016
	Death or incapacity of the LLC's sole member	April	2016
	Dissolution of a corporation	April	2016
	Dissolution of an LLC	April	2016
SCRA amendment enacted		April	2016
Title 50 gets an "app-endectomy"		April	2016
Guarantors not "applicants" under ECOA		April	2016
'Tis the (tax refund) season – Part II		March	2016
	Federal and Oklahoma state income tax refunds payable to a deceased account holder	March	2016
	Oklahoma Tax Refund Debit Cards	March	2016
Flood rule could ruin your HPML escrow exemption		March	2016
	Be prepared to change	March	2016
Compliance management: basic thoughts		March	2016
'Tis the (tax refund) season		February	2016
Garnishment gotchas		February	2016
	Determine who the judgment debtor is	February	2016
	A garnishment also attaches to a safe deposit box owned/leased by the judgment debtor	February	2016
Old POD designations		February	2016

Title	Subtitle	Month	Year
MLA – Clarity		February	2016
You have questions, we have answers		February	2016
Requests for customer information from other states		February	2016
Purchase money mortgage, spouse not on deed		February	2016
Safe deposit boxes		February	2016
Trust as POD		February	2016
Banning guns on premises		February	2016
Privacy Notice Changes		January	2016
	Gotchas!	January	2016
Settlement Fee May Be a Finance Charge		January	2016
Limits on Releasing Funds of Decedent under Section 906 of the SBC		January	2016
Effect of Divorce or Annulment on POD Accounts		January	2016
Reg O Executive Officer Loan Limits		January	2016
Pulling Credit Reports on Individuals		January	2016
Releasing Customer Records with Authorization		January	2016
Limits on Refinancing Certain Balloon Loans		January	2016
Loans to Non-U.S. Citizens		January	2016
When You Haven't Got Everyone on the Same Page		January	2016
The TRID Rule's "Alternate Tables"		January	2016
Reg DD Balance Disclosure Rule, ODP Access		January	2016
Pre-deceasing POD Beneficiaries		January	2016
It's Year-End: Have You Finished All the Annual Tasks?		December	2015
	Reg E § 1005.8	December	2015
	Reg P § 1016.5	December	2015
	BSA Annual Certifications	December	2015
	OFAC	December	2015
	IRAs, IRS Notice 2002-27	December	2015

Title	Subtitle	Month	Year
	Reg BB (CRA), Content and availability of Public File § 228.43	December	2015
	HMDA and CRA Notices and Recordkeeping	December	2015
	Training	December	2015
	Security, Annual Report to the Board of Directors § 208.61	December	2015
	Information Security Program part of GLBA	December	2015
	Annual MLO Registration § 1007.102	December	2015
	Other	December	2015
Reg Z v. the UCCC – Part II		December	2015
	Difference in emphasis	December	2015
	U3C: Credit sales and loans	December	2015
	Maximum interest rate	December	2015
	Differences in disclosures of certain fees	December	2015
FDIC's update on payday lending		December	2015
Key SCRA date approaching		December	2015
OHCA requests for asset verification		November	2015
	Why the OHCA asking for account balances	November	2015
	Right of privacy	November	2015
Reg Z vs. UCCC – Part I		November	2015
	Loans excluded from the U3C but are subject to Reg Z	November	2015
	Real estate loans excluded from certain U3C provisions	November	2015
	"Fresh Start Loans" excluded from Reg Z are subject to the U3C	November	2015
HMDA – Yes, Another huge change in what you do		November	2015
Amendments to OK Statutes effective 11/1/15		October	2015
TIMELY RELEASE OF MORTGAGES		October	2015
	Title 46 O.S. § 15 Holder Must Release – Penalty	October	2015

Title	Subtitle	Month	Year
TIMELY RELEASE LIEN ENTRIES ON MOTOR VEHICLE CERTIFICATES OF TITLE		October	2015
	Title 47 O.S. § 1110 Perfection of Security Interest	October	2015
AMENDMENTS TO OKLAHOMA'S DURABLE POWER OF ATTORNEY ACT		October	2015
	Title 58 O.S. §1074 Relationship of Court-appointed Fiduciary and Attorney-in-fact	October	2015
	Title 58 O.S. §1075 Effect of Death or Incapacity of Principal	October	2015
	AMENDED ARTICLE 9 – PART II	October	2015
	§ 1-9-102 Definitions and Index of Definitions.	October	2015
	§ 1-9-105 Control of Electronic Chattel Paper	October	2015
	§ 1-9-316 Effect of Change in Governing Law	October	2015
	§ 1-9-326 Priority of Security Interest Created by New Debtor	October	2015
	§ 1-9-518 Claim Concerning Inaccurate or Wrongfully Filed Record	October	2015
	§ 1-9-521 Uniform Form of Written Financing Statement and Amendment	October	2015
Welcome Words on TRID		October	2015
Integrated Disclosures Crunch Time		September	2015
	TRID deadline looms	September	2015
MLA – the Final Rules		August	2015
Amended Article 9 – Using the Correct Debtor Name	§1-9-102 Definitions and Index of Definitions	August	2015
	(a)(71) “Registered organization	August	2015
	(a)(68) “Public organic record	August	2015
	§ 1-9-503 Name of Debtor and Secured Party	August	2015
	§ 1-9-506 Effect of Errors or Omissions	August	2015
	§ 1-9-507 Effect of Certain Events on Effectiveness of Financing Statement	August	2015



Title	Subtitle	Month	Year
	§ 1-9-805 Effectiveness of Action Taken Before Effective Date	August	2015
TRID rule postponed		July	2015
	A technical glitch	July	2015
	August 15 or October 3?	July	2015
The SCOTUS disparate impact ruling		July	2015
	What is a lender to do?	July	2015
Small wave of flood changes, but watch the riptide		July	2015
	Use your time wisely.	July	2015
	How did we get here?	July	2015
	Biggert-Waters and HFIAA Amendments	July	2015
	New Rule – Specifics	July	2015
Good news on UTMA accounts		June	2015
Article 9 tweaks (finally!)		June	2015
FCRA lawsuits		June	2015
Expiry date passed on your flood notice		June	2015
SCRA – What have we learned recently?		June	2015
No changes in U3C late fees, dollar amounts		June	2015
U3C Sec. 3-508A amended		June	2015
I see dead people – Part 2		May	2015
New UTMA Amendment		May	2015
The Bureau's new RESPA booklet		April	2015
	Other loans	April	2015
	Relationship to new disclosures	April	2015
	When to start	April	2015
More TRID rule announcements		April	2015
	Updates to exam manual	April	2015
	Revised implementation materials	April	2015
A reminder on treasury ACH benefits changes		April	2015
It's more than mortgage lenders hours		April	2015
Airing dirty laundry in public		April	2015

Title	Subtitle	Month	Year
I see dead people		April	2015
Next compliance roundtable		March	2015
Two phrases I hate to hear		March	2015
Regulation Z changes		March	2015
Final rule affecting integrated disclosures		March	2015
	Rate-lock-related revised Loan Estimates	March	2015
	Name and NMLSR ID on documents	March	2015
	Loan Estimates for construction loans	March	2015
	Disclosure of prepaid interest	March	2015
	Drafting error in Regulation X	March	2015
Proposal to expand small creditor definition		March	2015
	Higher loan origination limit	March	2015
	A zinger added to the asset limit	March	2015
	A return to the one-year look-back for the “rural” or “underserved” counties criterion	March	2015
	Changes to definition of “rural.”	March	2015
	Changes to QM rules	March	2015
	And something for credit card issuers	March	2015
Lotteries are now OK — “It depends”		March	2015
Help us help you		March	2015
FAQs for direct deposits of IRS refunds		March	2015
Being a smart bank		February	2015
	Bank Secrecy Act	February	2015
	Insider lending	February	2015
	Credit cards for business use	February	2015
	Lending discrimination	February	2015
	Debt collection practices	February	2015
	Servicemember lending issues	February	2015
	Bad guys in the bank	February	2015
	Add-on products	February	2015
	Falling through the compliance cracks	February	2015

Title	Subtitle	Month	Year
Groundhog day		February	2015
Tweak, tweak		February	2015
For a good read		February	2015
Progress in the subpoena wars		January	2015
IRA rollover rules		January	2015
	The IRA Rollover Rule Prior to January 1, 2015	January	2015
	What Changed	January	2015
	The Transition Rule	January	2015
	Tax Consequences	January	2015
Common law marriage		January	2015
	What it is	January	2015
	Surnames, Addresses and CIP	January	2015
	Ways to prove marriage	January	2015
Keeping track of annual inflation adjustments		January	2015
Every January brings change		January	2015
HMDA		January	2015
CRA		January	2015
Key Regulation Z amounts		January	2015
	"Threshold amount" for Regulation Z coverage	January	2015
	High-Cost Mortgage Loan (HOEPA) points and fees triggers	January	2015
	"Small creditor" HPML escrow exemption amount	January	2015
	Threshold for exemption from HPML appraisal requirements.	January	2015
HUD-SCRA required notice		January	2015
	Confusion over the expired form	January	2015
Disparate impact – Why this case is important		December	2014
Tit. 42 O.S. §§ 91 and 91A amended		December	2014
Title 42 O.S. § 91		December	2014
	<i>Coverage</i>	December	2014
	<i>Notice of Possessory Lien</i>	December	2014

Title	Subtitle	Month	Year
	<i>Inspection of property and retrieval</i>	December	2014
	<i>Notice of Sale</i>	December	2014
	<i>Claimant must strictly comply with the statute</i>	December	2014
	<i>Damages and penalties</i>	December	2014
Title 42 O.S. § 91A		December	2014
	<i>Coverage</i>	December	2014
	<i>Notice of Possessory Lien</i>	December	2014
	<i>Inspection of property and retrieval</i>	December	2014
	<i>Notice of Sale</i>	December	2014
	<i>Claimant must strictly comply with the statute</i>	December	2014
FinCEN, the OCC, MSBs and Regulatory Risk		December	2014
	FinCEN's statement	December	2014
	OCC's Bulletin 2014-58	December	2014
	Analysis	December	2014
Privacy notice — final rule		November	2014
QM cures		November	2014
Servicing guidance		November	2014
Reg O — alive and being violated		November	2014
Flood insurance proposed rule		November	2014
Counties — rural or underserved		November	2014
Get it right the first time		November	2014
RESPA Sec. 8 kickbacks		November	2014
Redlining		November	2014
When "free checking" isn't		November	2014
Wells Fargo's maternity leave fiasco		November	2014
Military lending changes proposed		October	2014
Correcting direct deposits		October	2014
A lesson for mortgage servicers		October	2014
Trust your vendor, but verify		October	2014
Costly lender errors		October	2014
Exemption threshold going up		October	2014

Title	Subtitle	Month	Year
Unclaimed property		October	2014
	What is the purpose of the UPA?	October	2014
	When do holders have to report unclaimed property?	October	2014
	When is property presumed to be abandoned?	October	2014
If you're a HMDA reporter		September	2014
SCRA is still in the news		September	2014
Reg. AA — Gone but not forgotten		September	2014
Revisiting foreign remittance transfers		September	2014
	The Bureau makes more changes	September	2014
	The extension	September	2014
	Faxed disclosures	September	2014
	Expansion of oral disclosure situations	September	2014
	Military bases abroad	September	2014
Integrated disclosures: Countdown begins		September	2014
Bureau issues overdrafts reports		August	2014
FDIC: You misunderstood what we said		August	2014
When your OFAC tools aren't working		August	2014
What's up with those old Fed regulations		August	2014
Marriage equals marriage		August	2014
HELOC guidance		August	2014
Speaking of risk management		August	2014
Social media checkup		August	2014
4.1M CMP for deceptive practices		August	2014
Apps from new parents		August	2014
ITIN expirations		August	2014
ATR interpretive rule		August	2014
SAR stats & other BSA matters		August	2014
Watch those cards!		August	2014
HMDA reg proposal		August	2014
SCRA		August	2014

Title	Subtitle	Month	Year
Cooked books put bank in hot water		July	2014
	Fed and state order \$51 million in penalties	July	2014
RESPA penalties get personal		July	2014
FDIC hits Missouri bank with RESPA violations		July	2014
Regulators tout improvements		July	2014
More call report changes coming		July	2014
Guides for assisted living and nursing home staff		July	2014
Current account takeover cases — lessons learned		July	2014
Section 3-508A amended		July	2014
	3-508A Loans	July	2014
	Maximum Rates by Tier Amounts	July	2014
	The Dollar Amounts Of §3-508A Loans Will NOT Adjust Annually!	July	2014
	Alternative Maximum Rate	July	2014
	Minimum Loan Term	July	2014
But is the U3C applicable?		July	2014
U3C late fee, small loan amounts change		June	2014
	Increased Late Fee	June	2014
	3-508A Loans	June	2014
	3-508B Loans	June	2014
	3-511 Loans	June	2014
	Dealer Paper “No Deficiency” Amount	June	2014
SSNs and ITINs		June	2014
New implied SCRA requirements		June	2014
Last-minute flood insurance guidance		June	2014
	Agencies respond to lender questions	June	2014
Keeping customers happy		May	2014
	Some Examples of Consideration	May	2014
No guns?		April	2014
	§ 1290.22, as amended effective November 1, 2013, provides	April	2014

Title	Subtitle	Month	Year
	The changes to the statute are	April	2014
Prohibition on firearms in locked vehicles on bank property		April	2014
Signage		April	2014
Enforcing a no gun policy		April	2014
Policy and liability to employees		April	2014
CFPB reports on service members complaints		April	2014
	Credit Cards	April	2014
	Mortgages	April	2014
	Bank Accounts	April	2014
	Vehicle and Consumer Loans	April	2014
	Credit Reporting	April	2014
FRB debit card interchange fee upheld		April	2014
	What it all means	April	2014
Regulation E slips earn another bank a penalty		April	2014
Where to find what you're looking for		March	2014
	General principles	March	2014
	Federal vs. state	March	2014
	Statute vs. Rule	March	2014
	What to find in federal law	March	2014
	What to find in state law	March	2014
	Title 15. Contracts	March	2014
	State Banking Code. Title 6	March	2014
	Money orders	March	2014
	Financial Privacy	March	2014
	Electronic records	March	2014
	Protection against discovery	March	2014
	Negotiable Instruments. Title 12A	March	2014
	Bank Deposits and Collections, Title 12A	March	2014
	Funds Transfers, Title 12A	March	2014
	Secured Transactions, Title 12A	March	2014

Title	Subtitle	Month	Year
	UETA, Title 12A	March	2014
	Real estate matters, Title 16	March	2014
	Right of offset, Title 42	March	2014
Lessons from the Chase 'Madoff penalties'		February	2014
FDIC tech assistance video series		February	2014
Bureau is looking for mortgage 'pain points'		February	2014
Revised consumer booklets		February	2014
Still handling paper items?		February	2014
Cross-Collateralization		February	2014
Garnishments — When all funds are protected		February	2014
Record retention — Part 1		February	2014
Regulation and retention period		February	2014
Resolutions for your bank to consider		January	2014
	<i>Examine where you are in terms of threshold numbers.</i>	January	2014
	<i>Understand the new account before you open it</i>	January	2014
	<i>Handle tax refunds properly</i>	January	2014
	<i>Bone up on campaign accounts</i>	January	2014
	<i>Watch out how you handle payment of funeral expenses</i>	January	2014
	Title 58 O.S. Sec. 591	January	2014
Dodd-Frank readiness		December	2013
Integrated mortgage disclosures finalized		December	2013
	Delayed effective date will provide needed relief	December	2013
	25-acre exemption gone	December	2013
	GFE and HUD-1 forms aren't going away entirely	December	2013
	Timing for Loan Estimate	December	2013
	Another waiver provision	December	2013
	Advance delivery of Closing Disclosures	December	2013
	Responsibility for Closing Disclosures	December	2013
	Oops, something changed!	December	2013



Title	Subtitle	Month	Year
	New Regulation Z sections	December	2013
	New Model Forms	December	2013
	"All-in" APR proposal excluded	December	2013
	More analysis to come	December	2013
FinCEN definitions changes		December	2013
CFPB regulatory agenda		December	2013
Exemption thresholds creep upward		December	2013
Q & A on the Dodd-Frank rules		November	2013
Fair lending and qualified mortgages		November	2013
	New Guidance Issued	November	2013
Till death do we part		October	2013
	Trust DBA as sole proprietorship	October	2013
	Trust DBA as a corporation	October	2013
	When the Trust indicates the account is in the Trust but your account records don't	October	2013
	Pay on death beneficiary who predeceases the customer	October	2013
	Pay on death beneficiary who dies after the customer but before funds are distributed	October	2013
Interest bearing accounts, dormancy fees and unclaimed property.		October	2013
HUD's new qualified mortgage proposal		October	2013
More on certificates of deposit		September	2013
CDs and TISA subsequent disclosures		September	2013
	Change in terms	September	2013
	Notice before maturity for time accounts longer than one month that roll over	September	2013
	Maturity notices for non-renewing CDs of longer than one year	September	2013
IRA CDs		September	2013
The four "smalls"		September	2013

Title	Subtitle	Month	Year
HPML Escrow Small		September	2013
	Size	September	2013
	Number of transactions	September	2013
	Property location	September	2013
	Limited escrow history	September	2013
Small Servicer		September	2013
ATR/QM Small Creditor		September	2013
ATR/QM Small Creditor Plus		September	2013
Durable POA witness requirements		September	2013
Changing your early withdrawal penalties		August	2013
Armored-car answer from FinCEN (But...)		August	2013
Changes to rural and underserved counties list		August	2013
Anatomy of an E-SIGN violation		August	2013
What bankers wish customers knew – Part two		August	2013
Notice of title protection document		July	2013
	Other issues	July	2013
Responsible conduct		July	2013
Exam workpapers – Reg Z		July	2013
(Amended) Ability to repay rules hot off the press		July	2013
If your bank issues reloadable prepaid debit cards ...		July	2013
Treasury still issues some paper checks		July	2013
When federal ACH payment names don't match up		July	2013
What bankers wish customers knew		July	2013
Garnishment of Federal benefits rule revisions		June	2013
	§212.3 – Definitions	June	2013
	§212.6 – Rules and procedures to protect benefits	June	2013
	§212.7 – Notice to account holder	June	2013
Consumer loan dollar amounts adjust July 1		June	2013
	Increased Late Fee.	June	2013
	"3-508B," "3-508A" and "3-511" Loans.	June	2013

Title	Subtitle	Month	Year
	Dealer Paper “No Deficiency” Amount.	June	2013
The first California/Achieve financial settlement		June	2013
Breach of contract		June	2013
Final(?) ability to repay and qualified mortgage rules		June	2013
Interagency statement on Biggert-Waters Flood Insurance		May	2013
CFPB ability to repay – QM clarification proposal		May	2013
Some tweaks for HDMA getting it right		May	2013
Escrow rule: What we should have said is ...		May	2013
CARD Act rule revised		May	2013
NAME IT: A guide to formulating a formidable name for your bank		May	2013
Oklahoma’s Article 9 remains unchanged		May	2013
Oklahoma tax on IRA part 2:		May	2013
Traps for the Unwary		April	2013
FFIEC Social Media Guidance – Proposed		April	2013
Compliance and Risk Management		April	2013
A World of Two Names		April	2013
	Why am I writing about this process?	April	2013
Extended Escrows Under Reg Z		April	2013
ATR and QM		March	2013
	Background	March	2013
	Coverage	March	2013
	Consequences for non-compliance	March	2013
	Underwriting	March	2013
Refinancing existing loans		March	2013
Safe harbors		March	2013
QM product features		March	2013
	Getting protected	March	2013
	Another wrinkle	March	2013

Title	Subtitle	Month	Year
	Additional definitions	March	2013
	Possible changes	March	2013
The new mortgage servicing rules		February	2013
	New rate-change notices (§1026.20(c) and (d))	February	2013
	The new standard rate-change notice	February	2013
	The new special first rate-change notice	February	2013
	Payment processing (§1026.36(c)(1) and (2))	February	2013
	Payoff statements (§1026.36(c)(3))	February	2013
	Periodic statements (§1026.41)	February	2013
	Timing	February	2013
	Small servicer exemption	February	2013
	RESPA Servicing Requirements	February	2013
	New timely escrow disbursements requirement (§1024.34(a))	February	2013
	New escrow refund requirement (§1024.34(b))	February	2013
	New error resolution procedures (§1024.35)	February	2013
	Information requests (§1024.36)	February	2013
	Force-placed insurance provisions (§§1024.17(k) and 1024.37)	February	2013
	Servicing policies, procedures and requirements (§1024.38)	February	2013
	Record retention requirements	February	2013
	Early intervention requirements for certain borrowers (§1024.39)	February	2013
	Continuity of contact (§1024.40)	February	2013
	Loss mitigation procedures (§1024.41)	February	2013
New appraisal rules		February	2013
	Appraisal Rules for HPML/HPML-Flips (§1026.35(c))	February	2013
	Appraisal Requirements for All HPMLs	February	2013
	Exemptions from the Appraisal Requirements	February	2013
	"Flipped" Dwellings Require a Second Appraisal	February	2013

Title	Subtitle	Month	Year
	Exemptions from the Second Appraisal Requirement	February	2013
	Disclosures, Timing and Providing Copies of Appraisals	February	2013
	Appraisal Rules under Reg B	February	2013
Lending to the military – the CFPB’s new role		February	2013
	Military Lending Act	February	2013
Out of state, tribal and CFR court orders		January	2013
	Recognition v. Enforcement	January	2013
	Federal and state courts	January	2013
	Tribal and CFR courts	January	2013
ATM notice relief		January	2013
Hot topics for 2013 from the FRB		January	2013
COPPA update		January	2013
Deposit insurance reminder		January	2013
Remittance transfers: a brief reprieve		January	2013
	Foreign taxes and institution fees	January	2013
	Elimination of sub-national taxes	January	2013
	The big concern: Wrong account information from sender	January	2013
	Postponed effective date	January	2013
	Comment deadlines	January	2013
Religious headgear and compliance		January	2013
Corporate Account Takovers		December	2012
ATMs and the ADA		December	2012
Q&As on Getting Rid of Customer Property		December	2012
Foreign Remittance Transfer Rule to Change – Again		December	2012
FDIC Guidance on the Scheduled End of Unlimited Deposit Coverage		December	2012
MRAPLA Disclosures Postponement		December	2012
Reg Z’s Exemption Threshold Goes Up Again		December	2012

Title	Subtitle	Month	Year
Update on the Foreign Remittance Transfers Rule		November	2012
Updated CFPB Exam Manual and Supervision Findings		November	2012
Bureau Posts Supervision Findings and Updated Exam Manual		November	2012
Planning for an Employee's Absence Series: Garnishments		November	2012
It's That IRA Time of the Year, and Yes, Virginia, You Do Need to Withhold Oklahoma Taxes		November	2012
Qualified Mortgages		November	2012
IRA Time of Year		November	2012
Qualified Mortgages		November	2012
Reg Z, Late Fees and the Single Pay Note		October	2012
New Safe Deposit Law		October	2012
The Second Appraisal		October	2012
Proposed Homeownership Counseling Changes		October	2012
Tips for Reading the Proposals		October	2012
Stopping Payment on Cashier's Checks		September	2012
"Safe Harbor" Provision in Reg E's Remittance Transfers Rule		September	2012
CFPB Proposal Status Update		September	2012
Your Latest Q&As		September	2012
Correcting Social Security ACH errors		August	2012
Lessons from the PATCO ruling		August	2012
Abandoned foreclosures proceeding		August	2012
Oh, no! My customer is in bankruptcy!		August	2012
Q&As on OREO		August	2012
Complaint Responses		August	2012
FDIC Insurance Fees		August	2012
ATM Notices		August	2012
Biggert-Waters: Flood Insurance Reform Act		August	2012

Title	Subtitle	Month	Year
Servicemembers Civil Relief Act – Renewed Importance?		August	2012
Family Trust		July	2012
Property Tax Default		July	2012
Escrow Analysis Statement		July	2012
ACH Question		July	2012
Garnishment		July	2012
Free Checking Account		July	2012
Change in Terms		July	2012
Bank-owed Money-payments		July	2012
HPML Question		July	2012
Deceased Customer		July	2012
State Tax Levy from California		July	2012
APR Item		July	2012
Social Media, After Hours		July	2012
SCRA – Interest Rate		July	2012
Gift Card ATM Fee		July	2012
ATM ADA Compliance		July	2012
Customer E-Banking Question		July	2012
Regulation CC Question		July	2012
CTRs and Banks		July	2012
Tribes and Sovereign Nations		July	2012
Branch Designation		July	2012
POS Transactions Closing Accounts		July	2012
Endorsement Verification		July	2012
Business (Lottery) Account		July	2012
ATMs and the ADA		July	2012
Escheatment and Setoff of Cashier's Checks		July	2012
Supreme Court Rules in RESPA Fee Case		June	2012
ATM Disclosures		June	2012

Title	Subtitle	Month	Year
UTMA Accounts and the Custodian That Just Won't Let Go		June	2012
Consumer Loan Dollar Amounts Adjust July 1		June	2012
Fair Housing Poster Update		June	2012
Agency Updates		June	2012
Sole Proprietorships and General Partnerships		May	2012
S.A.F.E. Act Guidance		May	2012
Fair Lending		May	2012
Common Violations in 2011		May	2012
'Tis the Season – For Tax Refund Fraud		May	2012
Bureau Clarifies Reg Z Loan Officer Compensation Rule		May	2012
Mining the OCC's Citibank C&D for Nuggets		May	2012
Mortgage Servicing Change is in the Wind		May	2012
NOW Account Eligibility		April	2012
Mobile Banking Survey		April	2012
CFPB Complaints		April	2012
FinCEN's Notice on CDD		April	2012
	Beneficial ownership	April	2012
	FinCEN's Questions	April	2012
Paperless Treasury Payments		April	2012
More Call Report Changes Coming		April	2012
FHA Mortgage Pricing Cuts		April	2012
SAFE Act Exam Procedures Posted		April	2012
Extra Time to Respond to Comments		April	2012
Checking Out Non-profits		April	2012
CTR Guidance – Businesses with Common Ownership		April	2012
Overdrafts and UDAP		March	2012
MLO Compensation Issues		March	2012
FDIC Helps with Understanding Cards		March	2012



Title	Subtitle	Month	Year
Mortgage Fraud Update		March	2012
SAR Confidentiality		March	2012
Playing with your Regulatory Numbers		March	2012
Deposit Insurance Coverage Training		March	2012
Payment Processor Relationships		March	2012
FAQs		February	2012
	selection of questions and answers from the compliance team that cover a broad spectrum of problem areas	February	2012
<i>Compliance To-Dos for the New Year</i>		January	2012
	Regulation O	January	2012
	SAFE Act MLO Registration	January	2012
	Vendor Due Diligence	January	2012
	Annual Security Report	January	2012
	Information Security Report – GLBA	January	2012
	ACH Audit	January	2012
	FDICIA Annual Audit	January	2012
	Reg E Error Resolution Notice	January	2012
	Reg P Privacy Notice	January	2012
	Escrow Statements	January	2012
	CRA Public File	January	2012
	Records Disposal	January	2012
<i>Corporations and LLCs</i>		January	2012
	<i>Documentation for Corporations and LLCs</i>	January	2012
	<i>(More than) a few words about names</i>	January	2012
	<i>Information contained in the Certificate of Incorporation and the Articles of Organization</i>	January	2012
	<i>EIN or SSN</i>	January	2012
	<i>By-Laws/Operating Agreement/Minutes/Resolutions</i>	January	2012
	<i>Foreign Corporations and LLCs – Domesticated or Not</i>	January	2012
	<i>Can corporations and LLCs have a DBA?</i>	January	2012

Title	Subtitle	Month	Year
	<i>Can a sole shareholder corporation or sole-member LLC add a POD?</i>	January	2012
<i>Reg Q—Gone, but Not Forgotten</i>		January	2012
	<i>What exactly does this mean for banks that are contemplating paying interest on demand deposit accounts?</i>	January	2012
	<i>History provides perspective</i>	January	2012
	<i>What about NOWs?</i>	January	2012
<i>FDIC Talks Internet Banking</i>		December	2011
<i>HMDA LAR Update</i>		December	2011
<i>SAFE Act Renewals</i>		December	2011
<i>Payment Order</i>		December	2011
<i>The BCFP “Gets It”</i>		December	2011
<i>The Big “Why” – Part 3</i>		December	2011
<i>Q&amp;As</i>		December	2011
<i>Updated Flood Guidance</i>		November	2011
	Insurable Value	November	2011
	Force Placement	November	2011
	Proposed Q&As	November	2011
<i>OCC Reg E Booklet Revised</i>		November	2011
<i>Farewell to Paper Savings Bonds</i>		November	2011
<i>Enforcement Actions</i>		November	2011
	Commercial Real Estate Loan Problems	November	2011
	ADC Loans	November	2011
	UDAP and the Overdraft Program	November	2011
	Compliance Management	November	2011
	Eligible Depositor.	November	2011
	Reg E – Error Resolution	November	2011
	Worthless Clicks	November	2011
	Worthwhile Clicks	November	2011
<i>Examiners Can Be Too Soft</i>		November	2011

Title	Subtitle	Month	Year
<i>The Big "Why" – Part 2</i>		November	2011
State Statutory Changes		October	2011
	• Small Estate Cash Release	October	2011
	• Protection and Preservation of Property During Foreclosure	October	2011
	• Time limit for customer to sue on indorsement problem	October	2011
	• Minor garnishment changes	October	2011
The Big Why		October	2011
	• SCRA	October	2011
	• EFAA	October	2011
	• BSA	October	2011
	• ECOA	October	2011
	• HMDA	October	2011
Business Continuity Planning		September	2011
Examination Buzz		September	2011
	Financial Statements	September	2011
	HMDA	September	2011
	Flood Insurance	September	2011
	FDIC Signage	September	2011
	OFAC	September	2011
	Debt Collection	September	2011
	SCRA	September	2011
	Fair Lending	September	2011
	Strange Transactions	September	2011
CFPB Action		September	2011
Watch Your Mortgage-Related Fees		September	2011
Major Anti-Steering Case		September	2011
Foreclosure Policies and Procedures		September	2011
Q&As on Recent Changes to Regs B and V		September	2011
CFPB Powers Up		August	2011

Title	Subtitle	Month	Year
SAFE Registration Deadline Passes		August	2011
Check Your Email Signature Line		August	2011
Change Your AAN Address		August	2011
Updated Authentication Guidance Issued		August	2011
Risk Management on Prepaid Cards		August	2011
Debit Card Interchange Fees		August	2011
RESPA Reg Clarified		August	2011
Reg B/FCRA Notice Change		August	2011
Changes to the Risk-Based Pricing Notice		August	2011
THE CALM BEFORE THE STORM		July	2011
REVISED OKLAHOMA GARNISHMENT FORMS		July	2011
	Changes to the Summons	July	2011
	Changes to the Answer	July	2011
	<i>Change to the Notice of Garnishment and Exemptions</i>	July	2011
	<i>Other matters</i>	July	2011
GARNISHMENT QUESTION OF THE MONTH – BANKRUPTCY		July	2011
OCC “DROPS THE OTHER SHOE” ON OVERDRAFTS		July	2011
	Affected institutions	July	2011
	Statement of Principles	July	2011
	Disclosure	July	2011
	Legal compliance	July	2011
	Affirmative request	July	2011
	Availability and prudent eligibility standards	July	2011
	Prudent limitations on product costs and usage	July	2011
	Monitoring and risk assessments	July	2011
	Management oversight	July	2011
	Account management and charge-offs	July	2011
	Applicability to Overdraft Protection Programs (Appendix A)	July	2011

Title	Subtitle	Month	Year
	Program Availability and Prudent Eligibility Standards	July	2011
	"Opt-out"	July	2011
	Disclosures	July	2011
	Monitoring and Risk Assessments	July	2011
	Suspension, termination and charge-offs	July	2011
OCC'S PROPOSED GUIDANCE ON "DEPOSIT ADVANCE"		July	2011
	Affected products	July	2011
	Statement of Principles	July	2011
	Applicability to Deposit Advance Programs (Appendix B to the Proposed Guidance)	July	2011
	Program Availability and Prudent Eligibility Standards	July	2011
	"Opt-out"	July	2011
	Disclosures	July	2011
	Repayment terms	July	2011
	Monitoring and Risk Assessments	July	2011
	Management oversight	July	2011
	Charge-offs	July	2011
REG Z AMENDED – DON'T BLOW THIS OFF		July	2011
MORTGAGE DELINQUENCY NOTICE UPDATE		July	2011
MID-YEAR CHECKUP		July	2011
Federal Garnishment Regulation Update		June	2011
	Garnishment fees	June	2011
	Tax Levies	June	2011
	Institution policies	June	2011
	Which balance to use?	June	2011
	Brokerage accounts	June	2011
	New Garnishment Orders	June	2011
LESSONS LEARNED IN MORTGAGE FORECLOSURES		June	2011

Title	Subtitle	Month	Year
Exam Procedure Changes: SCRA and Tenants in Foreclosure Act		June	2011
You asked for it...Combined GFE/TIL		June	2011
Reg Z Exemption Amount Increased/Reg Z and Oklahoma's Uniform Consumer Credit Code("U3C") Coverage Compared		June	2011
Consumer Loan Dollar Amounts Adjust on July 1		June	2011
	Increased Late Fees.	June	2011
	"508B" and "508A" Loans	June	2011
	Dealer Paper "No Deficiency" Amount	June	2011
The Interagency Appraisal and Evaluation Guidelines		May	2011
	Coverage	May	2011
	Forbearance	May	2011
	Inadequate Appraisal and Evaluation Programs	May	2011
	Major Guidance Topics	May	2011
	Automated Valuation Models and Broker Price Opinions	May	2011
	Re-use of an Appraiser for Another Lender	May	2011
	Third Party Arrangements	May	2011
	Referrals	May	2011
FDIC Posts OD Guidance FAQ		May	2011
	Section I: Automated and ad hoc programs	May	2011
	What parts of the Guidance would apply to institutions with ad hoc overdraft decision-making?	May	2011
	Section II: Excessive Use and Meaningful Follow-up	May	2011
	What is meaningful and effective follow-up for chronic or excessive use?	May	2011
	Section III: Fee Limits and Maximizing Fees	May	2011
	Section IV: Other Questions	May	2011

Title	Subtitle	Month	Year
Fed and FDIC Propose to Pull Interest on Deposits Regs		May	2011
SHELTER FROM THE STORM – Garnishments, Part Two		May	2011
	First Things First – Log and Look	May	2011
	No Notice of Right to Garnish Federal Benefits	May	2011
	Oh, No! There are Direct Deposits of Federal Benefits!	May	2011
	Answering the Garnishment Summons When There are Protected Amounts:	May	2011
	Fees for Garnishments and Levies/Right of Offset	May	2011
	Bullet Point Summary of 31 CFR Part 212, Garnishment of Accounts Containing Federal Benefits Effective May 1, 2011	May	2011
Good News and Bad News about a New LAR is in Your Future		May	2011
New FDIC CRC Address		May	2011
Good 1099 News		May	2011
Appraisals: What's Changed		April	2011
New Federal Reg to Protect Direct Deposit Benefits Recipients		April	2011
Fed Publishes Final HPML Escrow Rules		April	2011
Fed Announces Another Reg Z Proposal		April	2011
Proposed Reg CC Overhaul Would Mean Shorter Holds, Less Paper		April	2011
Credit Card Rules "Clarification" Published		April	2011
The Times They are a-Changin': How to Deal with Garnishments in Oklahoma after May 1, 2011		April	2011
Privacy Notices		March	2011
Compensating Loan Officers		March	2011
Anti-Steering Rules		March	2011

Title	Subtitle	Month	Year
New Appraisal Rules		March	2011
Coping with the FDIC's Overdraft Guidance		March	2011
SCRA		March	2011
SAFE Act Registry Opens		February	2011
SCRA Becomes a Front Burner Issue		February	2011
New Payment Schedule Disclosures		February	2011
Poof! Proposed Rules Are Gone!		February	2011
Compliance Roundtable Meeting		February	2011
Signs, Signs, Update Your Signs		February	2011
The Latest in Deposit Insurance		February	2011
Standard Maximum Insurance Amount		February	2011
TAG—Oct. 14, 2008–Dec. 31, 2010—R.I.P.		February	2011
Temporary Unlimited Insurance — Dodd-Frank Act § 343		February	2011
The Last Word (For Now)		February	2011
Revisiting Regulation V: Risk-based Pricing		February	2011
Bankruptcy Practice Pointer: The Co-Debtor Stay		February	2011
Question of the Month (and then some): Revocable Trusts		February	2011
Lending Reg BOOT CAMP: HMDA		February	2011
Federal S.A.F.E. Act Registry Will (Probably) Be Up By January 31, 2011		January	2011
Banks May Not Accept Tax Deposit Coupons after December 31, 2010		January	2011
FDIC Insurance Coverage Changes Effective January 1, 2011		January	2011
Regulators Increase HMDA, CRA Thresholds Effective January 1, 2011		January	2011
New Reg Z Interim Final Rule Regarding Appraisal Independence Places Major New Burdens on Banks		January	2011



Title	Subtitle	Month	Year
	Scope of the Interim Final Rule	January	2011
	Prohibitions Against Coercion and Mischaracterization of Value (12 C.F.R. § 226.42(c))	January	2011
	Prohibition Against Conflicts of Interest (12 C.F.R. § 226.42(d))	January	2011
	Prohibitions Against Certain Extensions of Credit (12 C.F.R. § 226.42(e))	January	2011
	Customary and Reasonable Rate of Compensation for “Fee Appraiser”(12 C.F.R. § 226.42(f))	January	2011
	Mandatory Reporting of Appraiser Misconduct(12 C.F.R. § 226.42(g))	January	2011
MDIA Interim Rule effective January 30, 2011 Changed Again		January	2011
	September Interim Rule’s New Disclosure Requirements for Consumer Transactions Secured by Real Property or a Dwelling	January	2011
	September Interim Rule’s Requirement of “No-Guarantee-to-Refinance” Statement	January	2011
	Additional Requirements/Clarifications of December Interim Rule	January	2011
Compliance Dates Roundup		January	2011
	12/31/2010 – FDIC TAG Program Expires (for banks that did not opt out in April 2010) (See October 2010 Legal Update)	January	2011
	1/1/2011 – Deadline to Comply with New Final Rule for Notice of Transfer of Mortgage (See September 2010 Legal Update)	January	2011
	1/1/2011 – Deadline to Comply with Final Rule on Risk-Based Pricing (See October 2010 Legal Update)	January	2011

Title	Subtitle	Month	Year
	1/1/2011 – Model Privacy Notices Safe-Harbor Under Reg P Changes to New Model Form (See November 2010 Legal Update)	January	2011
	1/3/2011 – Deadline to Display Updated FDIC Insurance Signage (See October 2010 Legal Update)	January	2011
	1/30/2011 – Deadline to Comply with New Reg Z Disclosures (§ 226.18(s) and (t)) (See September 2010 Legal Update)	January	2011
OBA's Legal Department Introduces New Frequently Asked Questions Feature!		December	2010
Recent Case Sanctions Fraud Loss Shifting Provision in Commercial Deposit Account Agreements		December	2010
	What Happened in <i>Wachovia</i> ?	December	2010
	WAIVER OF RIGHTS BY THE BANK	December	2010
	<i>Wachovia</i> Court's Discussion of Applicable UCC Provisions	December	2010
	§ 4-103. Variation by Agreement – Measure of Damages – Certain Action Constituting Ordinary Care	December	2010
	But this is merely a default rule	December	2010
	The Customer's Arguments against Enforcement of the Account Agreement:	December	2010
	What Steps Should Your Bank Take to Protect Itself from Fraud Losses?	December	2010
	The Fraud Loss-Shifting Provisions	December	2010
	"Severability" or "Savings" Clause	December	2010
	Anti-Waiver Provision	December	2010
	Correction	December	2010
Compliance Dates Roundup		December	2010

Title	Subtitle	Month	Year
	12/31/2010 – FDIC TAG Program Expires (for banks that did not opt out in April 2010) (See October 2010 Legal Update)	December	2010
	1/1/2011 – Deadline to Comply with New Final Rule for Notice of Transfer of Mortgage (See September 2010 Legal Update)	December	2010
	1/1/2011 – Deadline to Comply with Final Rule on Risk-Based Pricing (See October 2010 Legal Update)	December	2010
	1/1/2011 – Model Privacy Notices Safe-Harbor Under Reg P Changes to New Model Form (See November 2010 Legal Update)	December	2010
	1/3/2011 – Deadline to Display Updated FDIC Insurance Signage (See October 2010 Legal Update)	December	2010
	1/30/2011 – Deadline to Comply with New Reg Z Disclosures (§ 226.18 (s) and (t)) (See September 2010 Legal Update)	December	2010
	1/31/2011 – Optional Gift Card/General Use Prepaid Card Compliance Deadline under Reg E (extended from August 22, 2010) (See November 2010 Legal Update)	December	2010
	3/1/2011 – HMDA Annual Filings Are Due (applies to HMDA banks only)	December	2010
	3/1/2011 – CRA Annual Filings Are Due	December	2010
	4/1/2011 – Deadline to Comply with New Final Rule Prohibiting Certain Loan Originator Compensation and Steering Practices. (See November 2010 Legal Update)	December	2010
New CRA Regulation Effective 11/3/2010		November	2010
	Consideration of Low-Cost Education Loans to Low-Income Borrowers	November	2010

Title	Subtitle	Month	Year
	Activities Undertaken in Cooperation with Minority- and Women-Owned Financial Institutions and Low-Income Credit Unions	November	2010
Model Privacy Notices Safe-Harbor Under Reg P Will Change Effective 1/1/2011		November	2010
	Safe Harbor For Sample Clauses Will Disappear after 12/31/2010	November	2010
	New Model Privacy Notice	November	2010
	What Should My Bank Do?	November	2010
New Final Rule Amends Reg Z, Prohibiting Certain Loan Originator Compensation and Steering Practices. Compliance Mandatory 4/1/2011		November	2010
	Important Definitions	November	2010
	Prohibition on Payments by Persons Other than the Consumer (12 C.F.R. § 226.36(d)(2))	November	2010
	Prohibition on Payments Based On Transaction Terms or Conditions (12 C.F.R. § 226.36(d)(1))	November	2010
	Payments based on transaction terms or conditions	November	2010
	Prohibition on Steering (12 C.F.R. § 226.36(e))	November	2010
	What Should My Bank Do?	November	2010
Federal Reserve Board Rule Reflects Delay in Gift Card Disclosure Requirements to 1/31/2011		November	2010
	Conditions That Must Be Met	November	2010
Federal Reserve Board Announces Annual Indexing of Reserve Requirement Exemption Amount and Low Reserve Tranche for 2011		November	2010
FDIC Issues New Guidance on Golden Parachute Applications		November	2010
Compliance Dates Roundup		November	2010

Title	Subtitle	Month	Year
	10/1/2010 – Deadline to Escrow for HPML Loans on Manufactured Housing (See September 2009 Legal Update)	November	2010
	10/1/2010 – Deadline to Adopt Policies and Procedures Required for Compliance with the S.A.F.E. Act (See August 2010 Legal Update)	November	2010
	11/1/2010 – Fees Banks May Charge for Compliance with Oklahoma Subpoenas Increase (See August 2010 Legal Update)	November	2010
	12/31/2010 – FDIC TAG Program Expires (for banks that did not opt out in April 2010) (See October 2010 Legal Update)	November	2010
	1/1/2011 – Deadline to Comply with New Final Rule for Notice of Transfer of Mortgage (See September 2010 Legal Update)	November	2010
	1/1/2011 – Deadline to Comply with Final Rule on Risk-Based Pricing (See October 2010 Legal Update)	November	2010
	1/1/2011 – Model Privacy Notices Safe-Harbor Under Reg P Changes to New Model Form (See November 2010 Legal Update)	November	2010
	1/3/2011 – Deadline to Display Update FDIC Insurance Signage (See October 2010 Legal Update)	November	2010
	1/30/2011 – Deadline to Comply with New Reg Z Disclosures (§ 226.18 (s) and (t)) (See September 2010 Legal Update)	November	2010
	4/1/2011 – Deadline to Comply with New Final Rule Prohibiting Certain Loan Originator Compensation and Steering Practices. (See November 2010 Legal Update)	November	2010

Title	Subtitle	Month	Year
Dodd-Frank Act Provides Changes to FDIC Insurance Coverage; TAG Program to Terminate 12/31/2010		October	2010
	Permanent Increase to \$250,000	October	2010
	Temporary Unlimited FDIC Guaranty for Noninterest-Bearing Transaction Accounts	October	2010
	Termination of the TAG Program Effective December 31, 2010	October	2010
Primer on Financial Privacy Issues		October	2010
	Oklahoma Financial Privacy Act	October	2010
	<i>Important Definitions:</i>	October	2010
	<i>Subpoena Procedures</i>	October	2010
	<i>Exceptions to Subpoena Procedures</i>	October	2010
	<i>Requirement of Certification of Compliance</i> (6 Okla. Stat. § 2208)	October	2010
	<i>What Should You Do When the Government Agency (or attorney) Hasn't Done Their Job?</i>	October	2010
	Federal Right to Financial Privacy Act	October	2010
	<i>Basic Requirements</i>	October	2010
	<i>Exceptions to Notice and Certification Requirements</i>	October	2010
	<i>Civil Liability</i>	October	2010
Compliance with Risk-Based Pricing Final Rule Mandatory January 1, 2011		October	2010
	Important Definitions	October	2010
	General Requirements for Risk-Based Pricing Notice (12 C.F.R. § 222.72)	October	2010
	<i>Credit Score Proxy Method</i> (12 C.F.R. § 222.72(b)(1))	October	2010
	<i>Tiered Pricing Method</i> (12 C.F.R. § 222.72(b)(2))	October	2010
	<i>Credit Card Method</i> (12 C.F.R. § 222.72(c))	October	2010

Title	Subtitle	Month	Year
	Exceptions to Risk-Based Pricing Notice Requirements (12 C.F.R. § 222.74)	October	2010
	Timing of Notices	October	2010
	Content of Notices	October	2010
National Flood Insurance Program Extended through September 30, 2011		October	2010
Compliance Dates Roundup		October	2010
	10/1/2010 – Deadline to Escrow for HPML Loans on Manufactured Housing (See September 2009 Legal Update)	October	2010
	10/1/2010 – Deadline to Adopt Policies and Procedures Required for Compliance with the S.A.F.E. Act (See August 2010 Legal Update)	October	2010
	11/1/2010 – Fees Banks May Charge for Compliance with Oklahoma Subpoenas Increase (See August 2010 Legal Update)	October	2010
	12/31/2010 – FDIC TAG Program Expires (for banks that did not opt out in April 2010) (See October 2010 Legal Update)	October	2010
	1/1/2011 – Deadline to Comply with New Final Rule for Notice of Transfer of Mortgage (See September 2010 Legal Update)	October	2010
	1/1/2011 – Deadline to Comply with Final Rule on Risk-Based Pricing (See October 2010 Legal Update)	October	2010
	1/3/2011 – Deadline to Display Update FDIC Insurance Signage (See October 2010 Legal Update)	October	2010
	1/30/2011 – Deadline to Comply with New Reg Z Disclosures (§ 226.18 (s) and (t)) (See September 2010 Legal Update)	October	2010
Final Guidance on Sound Incentive Compensation Policies		September	2010

Title	Subtitle	Month	Year
	Key Principles Underlying the Final Guidance	September	2010
	What Employees Are Covered?	September	2010
	Principles of a Sound Incentive Compensation System	September	2010
	Enforcement	September	2010
	Conclusion	September	2010
Interim Rule Requires New Disclosures for Consumer Mortgage Loans; Compliance Deadline January 30, 2011		September	2010
	Background to MDIA and the Interim Rule	September	2010
	New Disclosure Requirements for Consumer Transactions Secured by Real Property or a Dwelling	September	2010
	"No-Guarantee-to-Refinance" Statement	September	2010
New TILA Requirement of Notice When Mortgage Has Been Sold or Transferred; Compliance Mandatory January 1, 2011		September	2010
	Application of the Final Rule	September	2010
	Mortgage Transfer Disclosures (12 C.F.R. § 226.39)	September	2010
	Disclosure Required	September	2010
	Exceptions to the Disclosure Requirements	September	2010
	Content of the Disclosures	September	2010
Department of Justice Final Rule on ADA Standards for Accessible Design and New Proposed Rules Will Affect Banks		September	2010
	Background and History of the ADA	September	2010
Compliance Dates Roundup		September	2010
	6/25/2010 – Final Guidance on Incentive Compensation Policies Published (See discussion above)	September	2010



Title	Subtitle	Month	Year
	7/1/2010 – Deadline to comply with new Reg E Opt-in Requirement for Overdraft Protection for ATM and One-Time Debit Card Transactions (See <a href="#">December 2009 Legal Update</a> and <a href="#">June 2010 Legal Update</a> )	September	2010
	7/1/2010 – Deadline to comply with new Reg Z Changes to Open-End Credit (See March 2010 Legal Update)	September	2010
	7/1/2010 – Deadline to comply with new regulations under Fair and Accurate Credit Transactions Act (“FACT Act”) (See March 2010 Legal Update)	September	2010
	8/22/2010 – Certain TILA/Reg Z Credit Card Act Provisions Become Effective (including reasonableness/proportionality of penalty fees/charges and re-evaluation of rate increases) (See January 2010 Legal Update)	September	2010
	8/22/2010 – EFTA/Reg E Credit Card Act Provisions Restricting Certain Fees for Prepaid Gift Cards and Prohibiting Expiration Dates of Less than 5 Years Become Effective (See January 2010 Legal Update)	September	2010
	10/1/2010 – Deadline to Escrow for HPML Loans on Manufactured Housing (See September 2009 Legal Update)	September	2010
	10/1/2010 – Deadline to Adopt Policies and Procedures Required for Compliance with the S.A.F.E. Act (See August 2010 Legal Update)	September	2010
	12/31/2010 – FDIC TAG Program Expires (for banks that did not opt out in April 2010, unless program is further extended by FDIC) (See May 2010 Legal Update)	September	2010

Title	Subtitle	Month	Year
	1/1/2011 – Deadline to Comply with New Final Rule for Notice of Transfer of Mortgage (See discussion above)	September	2010
	1/30/2011 – Deadline to Comply with New Reg Z Disclosures (§ 226.18(s) and (t)) (See discussion above)	September	2010
Final S.A.F.E. Act Rule Adopted		August	2010
	The Secure and Fair Enforcement for Mortgage Licensing Act (S.A.F.E. Act)	August	2010
	(Non-)Applicability of the OK S.A.F.E. Act to Oklahoma Banks	August	2010
	The Final Rule	August	2010
	Who Can Register Under the federal registry?	August	2010
	Who Is A Mortgage Loan Originator? (12 C.F.R. § 34.102)	August	2010
	Registration Requirement (12 C.F.R. § 34.103(a))	August	2010
	Annual Renewal/Update Requirement (12 C.F.R. § 34.103(b))	August	2010
	Information Required from Registrant (12 C.F.R. § 34.103(d))	August	2010
	Information Required from the Depository Institution (12 C.F.R. § 34.103(d) and (e))	August	2010
	Depository Institutions Must Develop Policies and Procedures (12 C.F.R. § 34.104)	August	2010
	Conclusion	August	2010
School Warrants – A Primer		August	2010
Oklahoma H.B. 2936 Increases Fees for Compliance with State-Court Subpoenas Effective 11/1/2010		August	2010
HOEPA Dollar Trigger Increased Effective 1/1/2011		August	2010

Title	Subtitle	Month	Year
Compliance Dates Roundup		August	2010
	6/22/2010 – Deadline to Post Notice of Employees Right to Organize Under NLRA (for banks that have “government contracts”) (See June 2010 Legal Update)	August	2010
	6/30/2010 – TAG Program Expiration for Banks that Opted Out (See May 2010 Legal Update)	August	2010
	7/1/2010 – Deadline to comply with new Reg E Opt-in Requirement for Overdraft Protection for ATM and One-Time Debit Card Transactions (See December 2009 Legal Update and June 2010 Legal Update)	August	2010
	7/1/2010 – Deadline to comply with new Reg Z Changes to Open-End Credit (See March 2010 Legal Update)	August	2010
	7/1/2010 – Deadline to comply with new regulations under Fair and Accurate Credit Transactions Act (“FACT Act”) (See March 2010 Legal Update)	August	2010
	8/22/2010 – Certain TILA/Reg Z Credit Card Act Provisions Become Effective (including reasonableness/proportionality of penalty fees/charges and re-evaluation of rate increases) (See January 2010 Legal Update)	August	2010
	8/22/2010 – EFTA/Reg E Credit Card Act Provisions Restricting Certain Fees for Prepaid Gift Cards and Prohibiting Expiration Dates of Less than 5 Years Become Effective (See January 2010 Legal Update)	August	2010
	10/1/2010 – Deadline to Escrow for HPML Loans on Manufactured Housing (See September 2009 Legal Update)	August	2010

Title	Subtitle	Month	Year
	10/1/2010 – Deadline to Adopt Policies and Procedures Required for Compliance with the S.A.F.E. Act (See discussion above)	August	2010
	12/31/2010 – FDIC TAG Program Expires (for banks that did not opt out in April 2010, unless program is further extended by FDIC) (See May 2010 Legal Update)	August	2010
New Same-Day FedACH Service Available August 2, 2010		July	2010
	Eligible ACH Transactions	July	2010
	Transmission and Posting Deadlines	July	2010
Avoiding Potential Pitfalls With Motor Vehicle Liens		July	2010
	The Basics	July	2010
	The Bankruptcy Trustee's Ability to Avoid a Preference	July	2010
	What About the Bankruptcy Stay?	July	2010
	Completing the Lien Entry Form	July	2010
	Maintaining Priority in Secondary Advances	July	2010
	Perfecting a Security Interest in Indian Titles	July	2010
	Liability for Failure to Timely Release Lien	July	2010
	Practical Tips	July	2010
Oklahoma Department of Consumer Credit Updates Statutory Dollar Amounts Effective July 1, 2010		July	2010
Regulators Issue Final Guidance on Correspondent Concentration Risks		July	2010
	Procedures for Identifying Correspondent Concentrations	July	2010
	Monitoring Correspondent Relationships	July	2010

Title	Subtitle	Month	Year
	Development of Plans for Managing Concentration Risks	July	2010
	Good Practices for Correspondent Agreements	July	2010
Compliance Dates Roundup		July	2010
	6/1/2010 – Compliance Deadline for new Reg GG (Unlawful Internet Gambling Enforcement Act (“UIGEA”) mandatory (delayed from December 1, 2009) (See <a href="#">November 2009</a> and <a href="#">December 2009 Legal Updates</a> )	July	2010
	6/22/2010 – Deadline to Post Notice of Employees Right to Organize Under NLRA (for banks that have “government contracts”) (See June 2010 Legal Update)	July	2010
	6/30/2010 – TAG Program Expiration for Banks that Opted Out (See May 2010 Legal Update)	July	2010
	7/1/2010 – Deadline to comply with new Reg E Opt-in Requirement for Overdraft Protection for ATM and One-Time Debit Card Transactions (See <a href="#">December 2009 Legal Update</a> and <a href="#">June 2010 Legal Update</a> )	July	2010
	7/1/2010 – Deadline to comply with new Reg Z Changes to Open-End Credit (See March 2010 Legal Update)	July	2010
	7/1/2010 – Deadline to comply with new regulations under Fair and Accurate Credit Transactions Act (“FACT Act”) (See March 2010 Legal Update)	July	2010

Title	Subtitle	Month	Year
	7/1/2010 – <del>Deadline to Comply with Changes to Reg AA (under Unfair and Deceptive Acts or Practices (UDAP), dealing with marketing and account management of credit cards)</del> Note: Previously published final rule amending Reg AA has been RESCINDED. These changes are now incorporated in the Changes to Reg Z relating to credit cards.	July	2010
	8/22/2010 – Certain TILA/Reg Z Credit Card Act Provisions Become Effective (including reasonableness/proportionality of penalty fees/charges and re-evaluation of rate increases) (See January 2010 Legal Update)	July	2010
	8/22/2010 – EFTA/Reg E Credit Card Act Provisions Restricting Certain Fees for Prepaid Gift Cards and Prohibiting Expiration Dates of Less than 5 Years Become Effective (See January 2010 Legal Update)	July	2010
	10/1/2010 – Deadline to Escrow for HPML Loans on Manufactured Housing (See September 2009 Legal Update)	July	2010
	12/31/2010 – FDIC TAG Program Expires (for banks that did not opt out in April 2010, unless program is further extended by FDIC) (See May 2010 Legal Update)	July	2010
Clarifications Made to Reg E Regarding Restrictions on Overdraft Charges on ATM and One-Time Debit Card Transactions Further Revisions to Reg E (Overdraft Protection)		June	2010
	Deletion of Section 205.17(b)(4)	June	2010
	Other Changes	June	2010
HIRE Act Provides Tax Incentives to Employers to Hire in 2010		June	2010

Title	Subtitle	Month	Year
	Who Are Qualified Employees?	June	2010
	Payroll Tax Exemption	June	2010
	Credit for Retention of Qualified Employees Hired in 2010	June	2010
FDIC Issues Guidance for Periods of Lapse of Flood Insurance Authority		June	2010
Executive Order 13496 Requires Posting of Notice of Employees Right to Organize by June 21, 2010 – Affects Some Banks		June	2010
	Applicability to Banks	June	2010
	Notice Requirements	June	2010
	Penalties and Sanctions for Noncompliance	June	2010
Using a “Mark” as a Signature, What Is Required and What Risks Are There to the Bank?		June	2010
	Typical Contracts Executed By Mark Must Be Witnessed or Notarized	June	2010
	Signature on Checks	June	2010
	Use of POAs and Authorized Signers	June	2010
Compliance Dates Roundup		June	2010
	5/20/2010 – Deadline for banks participating in TAG Program to update in-bank notices relating to TAG Program extension (See May 2010 Legal Update)	June	2010
	6/1/2010 – Compliance Deadline for new Reg GG (Unlawful Internet Gambling Enforcement Act (“UIGEA”) mandatory (delayed from December 1, 2009) (See <a href="#">November 2009</a> and <a href="#">December 2009 Legal Updates</a> )	June	2010
	6/22/2010 – Deadline to Post Notice of Employees Right to Organize Under NLRA (for banks that have “government contracts”) (See This Issue)	June	2010

Title	Subtitle	Month	Year
	6/30/2010 – TAG Program Expiration for Banks that Opted Out (See May 2010 Legal Update)	June	2010
	7/1/2010 – Deadline to comply with new Reg E Opt-in Requirement for Overdraft Protection for ATM and One-Time Debit Card Transactions (See <a href="#">December 2009 Legal Update</a> and <a href="#">June 2010 Legal Update</a> )	June	2010
	7/1/2010 – Deadline to comply with new Reg Z Changes to Open-End Credit (See March 2010 Legal Update)	June	2010
	7/1/2010 – Deadline to comply with new regulations under Fair and Accurate Credit Transactions Act (“FACT Act”) (See March 2010 Legal Update)	June	2010
	<del>7/1/2010 – Deadline to Comply with Changes to Reg AA (under Unfair and Deceptive Acts or Practices (UDAP), dealing with marketing and account management of credit cards)</del> Note: Previously published final rule amending Reg AA has been RESCINDED. These changes are now incorporated in the Changes to Reg Z relating to credit cards.	June	2010
	8/22/2010 – Certain TILA/Reg Z Credit Card Act Provisions Become Effective (including reasonableness/proportionality of penalty fees/charges and re-evaluation of rate increases) (See January 2010 Legal Update)	June	2010
	8/22/2010 – EFTA/Reg E Credit Card Act Provisions Restricting Certain Fees for Prepaid Gift Cards and Prohibiting Expiration Dates of Less than 5 Years Become Effective (See January 2010 Legal Update)	June	2010



Title	Subtitle	Month	Year
	10/1/2010 – Deadline to Escrow for HPML Loans on Manufactured Housing (See September 2009 Legal Update)	June	2010
	12/31/2010 – FDIC TAG Program Expires (for banks that did not opt out in April 2010, unless program is further extended by FDIC) (See May 2010 Legal Update)	June	2010
TAG Program Extended Through December 31, 2010		May	2010
	Program Extended for 6 Month with another 12 Months Extension Possible without further rulemaking	May	2010
	Assessment rates unchanged, but reporting changed to average daily balance.	May	2010
	Maximum rate of interest payable reduced from 0.50 percent to 0.25 percent	May	2010
	New lobby notice requirements	May	2010
Mortgage Loan Officers Not Exempt Under FLSA According to New DOL Interpretation		May	2010
	Basics of the FLSA	May	2010
	Issuance of 29 C.F.R. § 541.203(b)	May	2010
	FLSA2006-31	May	2010
	Caselaw Following FLSA2006-31	May	2010
	DOL Administrator's Interpretation No. 2010-1	May	2010
	Why Administrator's Interpretation No. 2010-1 Is Important	May	2010
	What Should Banks Do Now?	May	2010
Banks' Right of Setoff vs. Federal Exemption for Social Security and Other Exempt Federal Benefits – Which Wins?		May	2010
	What Is the Right of Setoff?	May	2010

Title	Subtitle	Month	Year
	Federal Protection Provided to Social Security and Other Federal Benefits	May	2010
	Tom v. First American Credit Union – Still the Last Word from the Tenth Circuit	May	2010
	Washington v. Keffeler	May	2010
	What Should Banks Do Now?	May	2010
S.A.F.E. Act Update		May	2010
Compliance Dates Roundup		May	2010
	4/1/2010 – Escrow Required for HPML Applications Received after April 1	May	2010
	5/20/2010 – Deadline for banks participating in TAG Program to update in-bank notices relating to TAG Program extension	May	2010
	6/1/2010 – Compliance Deadline for new Reg GG (Unlawful Internet Gambling Enforcement Act (“UIGEA”) mandatory	May	2010
	7/1/2010 – Deadline to comply with new Reg E Opt-in Requirement for Overdraft Protection for ATM and One-Time Debit Card Transactions	May	2010
	7/1/2010 – Deadline to comply with new Reg Z Changes to Open-End Credit	May	2010
	7/1/2010 – Deadline to comply with new regulations under Fair and Accurate Credit Transactions Act (“FACT Act”)	May	2010
	<del>7/1/2010 – Deadline to Comply with Changes to Reg AA (under Unfair and Deceptive Acts or Practices (UDAP), dealing with marketing and account management of credit cards)</del> Note: Previously published final rule amending Reg AA has been RESCINDED. These changes are now incorporated in the Changes to Reg Z relating to credit cards.	May	2010

Title	Subtitle	Month	Year
'ABC's of Handling Repossessed Property		April	2010
2010 Provides Unique Opportunity to Defer Tax on Roth IRA Conversions		April	2010
Floor Plan Lending Presents Special Challenges (maybe from your regulator)		April	2010
When a Horse Is "Equipment" – It could only be the UCC		April	2010
Compliance Dates Roundup		April	2010
	4/1/2010 – Escrow Required for HPML Applications Received after April 1	April	2010
	6/1/2010 – Compliance Deadline for new Reg GG	April	2010
	7/1/2010 – Deadline to comply with new Reg E Opt-in Requirement for Overdraft Protection for ATM and One-Time Debit Card Transactions	April	2010
	7/1/2010 – Deadline to comply with new Reg Z Changes to Open-End Credit	April	2010
	7/1/2010 – Deadline to comply with new regulations under Fair and Accurate Credit Transactions Act ("FACT Act")	April	2010
Raffles and Giveaways and Lotteries, Oh My! What Can/Can't a Bank Do?		March	2010
	Federal Prohibition on Participation in Lotteries by Banks	March	2010
	Oklahoma Law Prohibits Lotteries	March	2010
	Answering Some Common Questions	March	2010
	Practical Tips	March	2010
FACT Act Changes Mandatory July 1, 2010 (Reg V)		March	2010
	Definitions	March	2010
	Establishment of Policies and Procedures Concerning the Accuracy and Integrity of Furnished Information (12 C.F.R. § 222.42)	March	2010

Title	Subtitle	Month	Year
	Investigation and Resolution of Direct Disputes (12 C.F.R. § 222.43)	March	2010
	Exceptions to Investigation Requirements	March	2010
Yet More Changes Affecting Open-End Credit to Consumers (Reg Z) Effective February 22, 2010 and July 1, 2010		March	2010
Reminder: Escrow Required for HPMLs for All Applications Received after April 1, 2010		March	2010
Compliance Dates Roundup		March	2010
	2/14/2010 – Deadline to Comply with Revisions to Reg Z for Higher Education Opportunity Act	March	2010
	2/22/2010 – Deadline to Comply with Provisions of Credit Card Act	March	2010
	3/1/2010 – HMDA and CRA Annual Filings Due	March	2010
	4/1/2010 – Escrow Required for HPML Applications Received after April 1	March	2010
	6/1/2010 – Compliance Deadline for new Reg GG	March	2010
	7/1/2010 – Deadline to comply with new Reg E Opt-in Requirement for Overdraft Protection for ATM and One-Time Debit Card Transactions	March	2010
	7/1/2010 – Deadline to comply with new Reg Z Changes to Open-End Credit	March	2010
	7/1/2010 – Deadline to comply with new regulations under Fair and Accurate Credit Transactions Act (“FACT Act”)	March	2010
	7/1/2010 – Deadline to Comply with Changes to Reg AA (under Unfair and Deceptive Acts or Practices (UDAP), dealing with marketing and account management of credit cards)	March	2010
Regulators Adopt Final Rule Implementing New FASB Standards 166 and 167		February	2010

Title	Subtitle	Month	Year
	Summary of FAS 166	February	2010
	Summary of FAS 167	February	2010
	Why FAS 166 and 167 Are Important to Banks	February	2010
	Final Rule	February	2010
Perfection and Priority in Certificates of Deposit		February	2010
	Perfection and Priority in Certificated CDs: Possession Required	February	2010
	Perfection and Priority in Book-Entry CDs: "Control" Required	February	2010
Despite Tough Legal Framework, Banks Can Take Steps to Protect Themselves from Losing Business to a Departing Employee		February	2010
	Oklahoma's Statutory Framework	February	2010
	Uniform Trade Secrets Act	February	2010
	Practical Suggestions for Banks:	February	2010
Upcoming Compliance Dates (New Feature!)		February	2010
	2/14/2010 – Deadline to Comply with Revisions to Reg Z for Higher Education Opportunity Act	February	2010
	2/22/2010 – Deadline to Comply with Provisions of Credit Card Act	February	2010
	3/1/2010 – HMDA and CRA Annual Filings Due	February	2010
	4/1/2010 – Escrow Required for HPML Applications Received after April 1 (except manufactured housing)	February	2010
	6/1/2010 – Compliance Deadline for new Reg GG (Unlawful Internet Gambling Enforcement Act ("UIGEA") mandatory	February	2010
	7/1/2010 – Deadline to comply with new Reg E Opt-in Requirement for Overdraft Protection for ATM and One-Time Debit Card Transactions	February	2010

Title	Subtitle	Month	Year
	7/1/2010 – Deadline to comply with new Reg Z Changes to Open-End Credit	February	2010
	7/1/2010 – Deadline to comply with new regulations under Fair and Accurate Credit Transactions Act (“FACT Act”)	February	2010
Reg CC Update: All Checks Are Local Effective 2/26/2010		January	2010
Taking Cashier’s Checks for Deposit in Today’s Environment of Fraud		January	2010
	Common Scams	January	2010
	Legal Framework Surrounding Cashier’s Checks	January	2010
	Recommendations for Minimizing Risk to Your Bank	January	2010
Revisions to Reg Z for Higher Education Opportunity Act Have Compliance Deadline of 2/14/2010		January	2010
	What Loans Are Affected?	January	2010
	Disclosure Requirements	January	2010
	Prohibition of Co-Branding (12 C.F.R. § 226.48(a) and (b))	January	2010
	Consumer’s Right to Accept (12 C.F.R. § 226.48(c))	January	2010
	Consumer’s Right to Cancel (12 C.F.R. § 226.48(d))	January	2010
	Self-Certification Form (12 C.F.R. § 226.48(e))	January	2010
Provisions of Credit Card Act Effective 2/22/2010		January	2010
	Limitations on Fees and Interest Rates	January	2010
	Safeguards for Young Borrowers	January	2010
	Gift Card Restrictions	January	2010
	Increased Government Oversight and Additional Requirements	January	2010
HOEPA Fee Trigger Lowered For 2010		January	2010

Title	Subtitle	Month	Year
Clarification from Federal Reserve Supports Viability of Short-Term Balloon Notes in Spite of HPML Changes		December	2009
Reg GG Implementation Deadline Extended at Last Minute to June 1, 2010		December	2009
Recent Reg CC Changes: We Are Quickly Heading Toward All Local Checks		December	2009
Final Rule Revising Reg E Restricts Overdraft Charges on ATMs and One-Time Debit Card Transactions Effective July 1, 2010		December	2009
	Relationship between Reg E and Reg Z [12 C.F.R. § 205.12]	December	2009
	Important Definitions	December	2009
	Opt-In Requirement [12 C.F.R. § 205.17(b)]	December	2009
	Exceptions to Opt-In Requirement 12 C.F.R. § (b)(4)	December	2009
	Prohibition on Bundling ATM/One-Time Debit Card Overdraft Protection [12 C.F.R. § 205.17(b)(2) and (3)]	December	2009
	Timing of Implementation [12 C.F.R. § 205.17(c)]	December	2009
	Requirements of Notice to Customers [12 C.F.R. § 205.17(d)]	December	2009
	Customer's Right to Opt Back Out	December	2009
	Rationale for the Final Rule	December	2009
	Technical Issues for Implementing Final Rule	December	2009
	Practical Advice in Wake of the Final Rule	December	2009
FinCEN's BSA E-Filing Completes Transition to Adobe-based Electronic Forms Effective 1/1/2010		December	2009
	Discrete Filers	December	2009
	Batch Filers	December	2009
	Secure Direct Transfer Mode (SDTM) Filers	December	2009
Reminder: Changes to Reg DD Effective 1/1/2010		December	2009

Title	Subtitle	Month	Year
Reminder: HUD's Reg X (RESPA) Changes; Use of New GFE and HUD-1 Forms Mandatory 1/1/2010		December	2009
Reg S Revised to Increase Fees for Subpoena Compliance Effective 1/1/2010		December	2009
S.A.F.E. Act Update		December	2009
	Where Are We Now?	December	2009
Compliance with New Reg GG Is Mandatory on December 1, 2009		November	2009
	Adoption and Implementation of Written Policies	November	2009
	Notice to Existing Commercial Customers	November	2009
	Due Diligence Procedures: Account Opening	November	2009
Oklahoma's Estate Tax Repealed Effective January 1, 2010		November	2009
	Not a License to Distribute Funds	November	2009
	Safe Deposit Boxes	November	2009
	Happiness Short Lived?	November	2009
3% Interest Requirement for County Deposits Gone Effective July 1, 2009		November	2009
Change to Unclaimed Property Statute Effective November 1, 2009		November	2009
OK to Charge Fee to Cash On-Us Check for Non-Customers?		November	2009
	Discussion of UCC Provisions	November	2009
	History of the Caselaw	November	2009
	Oklahoma Caselaw	November	2009
	Reg DD	November	2009
FDIC's Final Rule Extends TAG Program 6 Months to June 30, 2010; Participating Entities Can Opt Out of Extension by November 2		October	2009
Working Around the October 1 Reg Z Changes		October	2009
	<i>ARM Loans</i>	October	2009



Title	Subtitle	Month	Year
	<i>7-Year Balloons</i>	October	2009
	<i>3.5- or 4-Year Renewable Balloon Notes</i>	October	2009
	<i>Need for Clarification of Presumption of Compliance Rules</i>	October	2009
Changes to HUD's Reg X (RESPA) Go In Effect January 1, 2010		October	2009
	<i>Use of New Mortgage Servicing Transfer Disclosure Form</i>	October	2009
	<i>Changes to Four Key Definitions</i>	October	2009
	<i>Allowance of Use of Average Charges</i>	October	2009
Special Risks Surround Using Farm Products as Collateral		October	2009
	<i>State Adoption of Central Filing System and the Exceptions Thereunder</i>	October	2009
	<i>Exception Where Buyer Receives Written Notice from Secured Party</i>	October	2009
Creation of HPMLs and Requirements for Verification of Repayment Ability for HPMLs and HOEPA Loans		September	2009
	HOEPA Loans	September	2009
	<i>Higher-Priced Mortgage Loans</i>	September	2009
	Requirements for Verification of Repayment Ability for HPMLs and HOEPA Loans	September	2009
	Presumption of Compliance or Requirement?	September	2009
	Examples (from 12 C.F.R. Pt. 226, Supp. 1):	September	2009
	Exclusions from Presumption of Compliance	September	2009
	Treatment of ARM Loans	September	2009
	Application of New Rules to Loan Renewals and Assumptions	September	2009

Title	Subtitle	Month	Year
New Escrow Requirement for HPMLs Effective for Applications Received on or after April 1, 2010 (October 1, 2010 for Manufactured Homes)		September	2009
Restrictions on Prepayment Penalties for HPMLs and HOEPA Loans Effective 10/1/2009		September	2009
	Restrictions Applicable to HPMLs (12 C.F.R. § 226.35(b)(2))	September	2009
	Restrictions Applicable to HOEPA Loans (12 C.F.R. § 226.32(d)(6) and (7))	September	2009
Revisions to HMDA (Reg C) Incorporate Reg Z's Addition of HPMLs Effective 10/1/2009		September	2009
New Appraisal-Related Amendments Effective 10/1/2009		September	2009
	Examples of Prohibited Conduct:	September	2009
	Examples of Conduct that Do Not Violate This Section:	September	2009
	<i>New Mortgage Servicing Practices Effective 10/1/2009</i>	September	2009
New Mortgage Servicing Practices Effective 10/1/2009		September	2009
New Advertising Restrictions Affecting Closed-End Credit Loans Effective 10/1/2009	New Clear and Conspicuous Standard for Closed-End Credit Advertisements	September	2009
	Disclosures Required If "Triggering Terms" Are Used	September	2009
	Alternative Disclosures for Television or Radio Advertisement (12 C.F.R. § 226.24(g))	September	2009
	Additional Restrictions Applicable to Advertisement for Credit Secured by a Dwelling	September	2009
	Acts Specifically Prohibited for Advertisements for Credit Secured By a Dwelling (12 C.F.R. § 226.24(i))	September	2009
S.A.F.E. Act Redux		September	2009

Title	Subtitle	Month	Year
<i>Byron's Quick Hit for October 1 Reg Z and Reg C Changes</i>		September	2009
Greetings from the OBA's New General Counsel		August	2009
After the Loan: Don't Lose Your Priority to a Federal Tax Lien		August	2009
	<i>Federal law controls priority of a federal tax lien.</i>	August	2009
	<i>Property that Federal Tax Lien Will Not Take Priority, Even with Filing:</i>	August	2009
	<i>The 45 Day Rule of I.R.C. § 6323(c)</i>	August	2009
	<i>Loan advances</i>	August	2009
	<i>What should you do?</i>	August	2009
	<i>Loans Secured by After-Acquired Collateral</i>	August	2009
	<i>Subsequent loan advances</i>	August	2009
	<i>Where to Check for Federal Tax Lien Filing</i>	August	2009
	<i>Liens on Real Property</i>	August	2009
	<i>25 day Notice to the IRS Required Prior to Foreclosing on Property Subject to Tax Lien under I.R.C. § 7425</i>	August	2009
	<i>Conclusion</i>	August	2009
Credit Card Act of 2009: Certain Provisions Effective August 20, 2009, Plus Overview of Remaining Provision		August	2009
	<i>Advanced Notice of Increase in APR or Other Significant Changes</i>	August	2009
	<i>Right to Cancel upon Notification of Rate Increase/Other Significant Changes</i>	August	2009
	<i>Timing of Periodic Statements in Relation to Late Fees</i>	August	2009
	<i>Summary of Other Important Provisions of the Credit Card Act of 2009:</i>	August	2009
	<i>Limitations on Fees and Interest Rates</i>	August	2009

Title	Subtitle	Month	Year
	<i>Safeguards for Young Borrowers</i>	August	2009
	<i>Gift Card Restrictions</i>	August	2009
	<i>Increased Government Oversight and Additional Requirements</i>	August	2009
Home Valuation Code of Conduct: Affects Sale of Residential Mortgage Loans to Fannie Mae and Freddie Mac Beginning May 1, 2009		August	2009
	<i>Provisions of the HVCC</i>	August	2009
	<i>Rules for Appraiser Engagement</i>	August	2009
	<i>Prohibitions Against Influencing Appraisers</i>	August	2009
	<i>Other Provisions of HVCC</i>	August	2009
New Notice Required Upon Sale/Transfer of Residential Home Mortgages & Protecting Tenants at Foreclosure Act, Both Effective May 20, 2009		August	2009
	<i>Notice Required Upon the Sale or Transfer of a Residential Home Mortgage</i>	August	2009
	<i>Protecting Tenants at Foreclosure Act</i>	August	2009
		August	2009
Reg D – Savings Deposit Transfers Rule Changes July 2, 2009		July	2009
Reg Z – MDIA Changes – Effective July 30, 2009		July	2009
	<i>What loans are covered?</i>	July	2009
	<i>Definitions of “business day.”</i>	July	2009
	<i>Let’s get this party started</i>	July	2009
	<i>We have received an application, so now what happens?</i>	July	2009
	<i>Notice requirement</i>	July	2009
	<i>Charging the consumer fees</i>	July	2009
	<i>When is redisclosure required?</i>	July	2009
	<i>Waiver of Waiting Period Before Consummation</i>	July	2009
	<i>Calculating when consummation may occur</i>	July	2009

Title	Subtitle	Month	Year
The Secure and Fair Enforcement for Mortgage Licensing Act (S.A.F.E. Act)		July	2009
The Oklahoma Department of Consumer Credit's Truth in Lending Permanent Rule		July	2009
Consumer Loan Dollar Amounts – No Changes		July	2009
No Article published for this month	No Article published for this month	June	2009
Charging Consumer Interest Using a 360-Day Year?		May	2009
Adding a Floor to Variable-Rate Mortgage Loans?		May	2009
Waiving a Rate That is Too High		May	2009
Default Interest Not Allowed on Consumer Loans?		May	2009
	<i>U3C Restrictions</i>	May	2009
	<i>U3C &amp; Regulation Z Exceptions</i>	May	2009
	<i>No Exclusions for High-Rate/High-Fee Mortgages</i>	May	2009
	<i>Further Considerations.</i>	May	2009
New Rules for Disclosure of Overdraft Fees		April	2009
	1. Disclosing Total Fees Charged	April	2009
	2. Required "Tabular" Format	April	2009
	3. What Fees are Included	April	2009
	4. Disclosure of Account Balances	April	2009
	5. Making Other Choices?	April	2009
	6. Other Pending Proposals	April	2009
Helping a Customer to Avoid or Decrease Overdraft Charges		April	2009
Risk Management of Remote Deposit Capture		March	2009
	<i>Why RDC is Different</i>	March	2009
	<i>Operational Risks</i>	March	2009
	<i>Risk-based Decision-making.</i>	March	2009
	<i>Qualifying a Customer Financially?</i>	March	2009
	<i>Legal and Compliance Risks</i>	March	2009
	<i>RDC Depositor Agreements</i>	March	2009

Title	Subtitle	Month	Year
	<i>Appropriate Controls</i>	March	2009
New FDIC Disclosure for Banks Offering Sweep Accounts		February	2009
	<i>Types of Sweep Account</i>	February	2009
	<i>Some Excluded Sweep Accounts</i>	February	2009
	<i>Why Sweep Accounts?</i>	February	2009
	<i>FDIC Cutoff Point</i>	February	2009
	<i>Will A Better Scenario Occur?</i>	February	2009
	<i>No More "External" Transactions</i>	February	2009
	<i>External Sweep Accounts</i>	February	2009
	<i>Internal Sweep Accounts</i>	February	2009
	<i>Contents &amp; Timing of Notice</i>	February	2009
Various Cost-of-Living Increases in Dollar Amounts for 2009		January	2009
	<i>HOEPA "High-Fee" Mortgages</i>	January	2009
	<i>HMDA-Reporting Banks</i>	January	2009
	<i>Community Reinvestment Act</i>	January	2009
	<i>Health Savings Accounts</i>	January	2009
	<i>IRAs</i>	January	2009
No IRA Minimum Distributions Required for 2009		January	2009
Interagency Statement on Meeting Needs of Creditworthy Borrowers		January	2009
	<i>Lending to Creditworthy Borrowers</i>	January	2009
	<i>Shouldn't a Bank Control Its Lending?</i>	January	2009
	<i>Strengthening Capital</i>	January	2009
	<i>Dividends for Debt Service &amp; Taxes</i>	January	2009
	<i>Working with Mortgage Borrowers</i>	January	2009
	<i>Structuring Compensation</i>	January	2009
	<i>All Banks Must Adhere</i>	January	2009
Creditor Must Be Notified if Personal Representative Rejects a Claim in Probate		December	2008

Title	Subtitle	Month	Year
Unclaimed Property—Collecting Fees Owed on Safe Deposit Boxes		December	2008
Oklahoma Adopts Uniform Real Property Electronic Recording Act		December	2008
Notification Required for Security Breach Of Computerized Data		December	2008
	<i>Background</i>	December	2008
	<i>The Act's Coverage</i>	December	2008
	<i>Exclusions for Financial Institutions and Others</i>	December	2008
	<i>Breach of Security</i>	December	2008
	<i>"Personal Information"</i>	December	2008
	<i>Method of Enforcement</i>	December	2008
	<i>"Encrypted/Redacted"</i>	December	2008
	<i>"Notice"</i>	December	2008
Capital Purchase Plan Deadline Extended for Non-publicly-traded Banks		November	2008
"Opt Out" Date Extended for FDIC's Temporary Liquidity Program		November	2008
	<i>Notifying the FDIC</i>	November	2008
	<i>Summary of the Program</i>	November	2008
	<i>"Transaction Account Guarantee Program"</i>	November	2008
	<i>Calculating Available Coverage</i>	November	2008
	<i>Includes "Official Checks"</i>	November	2008
	<i>Whose Deposits are Covered?</i>	November	2008
	<i>Lobby Signs Required</i>	November	2008
	<i>"Debt Guarantee Program"</i>	November	2008
	<i>More Questions</i>	November	2008
Tax Free Charitable Distributions from IRAs		November	2008
	<i>Charitable Gift of the RMD</i>	November	2008
	<i>Maximizing the Distribution</i>	November	2008
	<i>Smaller Charitable Distributions</i>	November	2008

Title	Subtitle	Month	Year
	<i>Larger Charitable Distributions</i>	November	2008
Recent Changes to FDIC Insurance for Trusts, POD Accounts		October	2008
	<i>Reason for the Changes</i>	October	2008
	<i>"Qualifying Beneficiaries"</i>	October	2008
	<i>Trust Deposits up to \$500,000</i>	October	2008
	<i>Deposits over \$500,000</i>	October	2008
	<i>Trust Becomes Irrevocable</i>	October	2008
Importance of Training to Deal with FDIC Insurance Questions		October	2008
	<i>Training the Tellers</i>	October	2008
	<i>Training Loan Officers</i>	October	2008
	<i>Confidential Discussion of Finances</i>	October	2008
	<i>Good and Bad Responses</i>	October	2008
	<i>Failing "Banks"</i>	October	2008
	<i>FDIC Insurance Limits</i>	October	2008
	<i>Getting the Message Out</i>	October	2008
	<i>Deposits for Liquidity</i>	October	2008
Two Changes to Servicemembers' Civil Relief Act		September	2008
	Foreclosure of Mortgages	September	2008
	Longer Interest Reduction	September	2008
Tax Credit for First-Time Homebuyers		September	2008
	Structuring a Home Purchase	September	2008
	First-Time Homebuyer	September	2008
	June 30, 2009 Deadline	September	2008
	Principal Residence	September	2008
	Amount of Tax Credit	September	2008
	"Refundable" Tax Credit	September	2008
	Accelerated Recapture of Tax Credit	September	2008
	"Tax Recapture" Examples	September	2008
	Death; Condemnation of Property	September	2008



Title	Subtitle	Month	Year
	Divorce; Transfers between Spouses	September	2008
	Requirement to File Tax Returns	September	2008
Can Banks Freeze Home-Equity Lines of Credit?		September	2008
	Grounds for Reduction	September	2008
	Notice of Reduction	September	2008
	Periodic Re-evaluation	September	2008
	Best Practices	September	2008
Motor Vehicle Lien Entry Forms Are Changing		August	2008
New Statute Allows "Transfer on Death" for Real Estate		August	2008
	<i>1. Avoiding Probate</i>	August	2008
	<i>2. Transferring "Titled" Property</i>	August	2008
	<i>3. Various Beneficiary Statutes</i>	August	2008
	<i>4. Joint Tenancy—Pros and Cons</i>	August	2008
	<i>5. TOD Deed—Basic Provisions</i>	August	2008
	<i>6. Time of Filing Deed</i>	August	2008
	<i>7. Execution of Deed</i>	August	2008
	<i>8. Special Deed Form Required</i>	August	2008
	<i>9. Joint Tenancy Plus TOD</i>	August	2008
	<i>10. Revoking a Deed</i>	August	2008
	<i>11. Title Passes at Death</i>	August	2008
	<i>12. Encumbrances on Real Estate</i>	August	2008
	<i>13. When Beneficiary Dies First</i>	August	2008
	<i>14. Unsecured Creditors &amp; Claims</i>	August	2008
	<i>15. Unintended Consequences?</i>	August	2008
Commissioner's Bill Revises Several Banking Provisions		July	2008
	<i>1. Refund of Assessments</i>	July	2008
	<i>2. Temporary College Branches</i>	July	2008
	<i>3. Branches at Temporary Events</i>	July	2008
	<i>4. Eliminating Certain Fees</i>	July	2008

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Recent Changes to Oklahoma Banking Board's Regulations		July	2008
	<i>1. Board Reporting/Loans</i>	July	2008
	<i>2. Board Reporting/Loan Concentration</i>	July	2008
	<i>3. Required Info for Loan Participants</i>	July	2008
	<i>4. Mandatory Vacation/Internal Control</i>	July	2008
	<i>5. Dormant Accounts</i>	July	2008
	<i>6. Registration of Non-bank ATMs</i>	July	2008
Major Changes to Oklahoma's Record Retention Schedule		July	2008
	<i>1. Limitations of Old Retention Schedule</i>	July	2008
	<i>2. Requirements of the Revised Reg</i>	July	2008
	<i>3. Retention Issues</i>	July	2008
	<i>4. Formal Retention Policy?</i>	July	2008
Elder Abuse Punishment Increases		July	2008
Consumer Loan Dollar Amounts Adjust on July 1		June	2008
Paying 3% Interest on County Deposits		June	2008
Accepting Checks with Missing Endorsements		June	2008
Accepting Checks for Collection		June	2008
A word of caution for Lenders operating under Section 3-508B:		June	2008
New FDIC Guide to Deposit Insurance Of Trusts & POD Accounts		May	2008
	Qualifying Beneficiaries	May	2008
	One-Owner Revocable Trusts	May	2008
	Revocable Trust Becomes Irrevocable	May	2008
	Primary & Contingent Beneficiaries	May	2008
	Changed Amount of Insurance?	May	2008
	Certificate of Trust?	May	2008
	Life Estate & Remainder Beneficiaries	May	2008
	Joint Revocable Trusts	May	2008

Title	Subtitle	Month	Year
	POD Accounts	May	2008
	Contingent POD Beneficiaries	May	2008
	Joint Accounts with PODs	May	2008
	Irrevocable Trusts	May	2008
"Local Check" Area Expanding on April 19		April	2008
Recent Court Ruling Concerning Liens on Indian Car Titles		April	2008
Using W-9s (With SSN or ITIN) or W8-BENs to Open Accounts		April	2008
	1. Requiring Identification Numbers	April	2008
	2. W-9 to Open Accounts	April	2008
	3. W8-BEN for Opening Accounts	April	2008
	4. Types of Social Security Cards	April	2008
	6. Documentation for Issuing an SSN	April	2008
	7. Appropriate CIP Documentation?	April	2008
	8. Why Apply for an ITIN?	April	2008
	9. Valid Tax Reason for ITIN	April	2008
	10. Documentation to Obtain an ITIN	April	2008
	11. ITIN "Applied For"	April	2008
Understanding Representative Payee Accounts		March	2008
	When is a Representative Payee Appointed?	March	2008
	Correct Account Styling	March	2008
	Guardian/Rep Payee	March	2008
	Successor Trustee/Rep Payee	March	2008
	POA/Rep Payee	March	2008
	Only a Rep Payee	March	2008
	Only an Authorized Signer	March	2008
	Joint Accounts	March	2008
	Organizational Rep Payees	March	2008
	Rep Payees for Children	March	2008

Title	Subtitle	Month	Year
Replacing a Cashier's Check Based on Declaration of Loss		February	2008
	1. Some Definitions	February	2008
	2. Declaration of Loss	February	2008
	3. Procedural Steps	February	2008
	4. Indemnity Agreement	February	2008
Basis for Charging "Unauthorized" Items to Customer's Account		February	2008
	1. Preclusion	February	2008
	2. Agency	February	2008
	3. Estoppel	February	2008
	4. Ratification	February	2008
Other Ways a Forged Signature is Not a Forgery		February	2008
Duties of Card Issuers Regarding Address Discrepancies		January	2008
	1. Who Is Covered?	January	2008
	2. Address Validation Requirements	January	2008
	3. "Notice" Method	January	2008
	4. "Other" Method	January	2008
	5. Timing for Compliance—Two Options	January	2008
Verifying Social Security Numbers		January	2008
Permitted Number of Transactions on Savings & MMDAs	1. Number of Allowed Transactions	January	2008
	2. Eliminating Excess Transactions	January	2008
	15. Other Provisions	December	2007
Discussion of Identity Theft Red Flags		December	2007
	Developing Responses to Red Flags	December	2007
	Suspicious Activity Reports & Privacy Exceptions	December	2007
	Example of SAR Filing	December	2007
	Credit Report Alerts & Notices	December	2007
	Suspicious Documents	December	2007

Title	Subtitle	Month	Year
	Suspicious Personal Identifying Information	December	2007
	Unusual Use/Suspicious Activity on Account	December	2007
	Notice of Identity Theft	December	2007
Joint Regulation on Identity Theft Red Flags & Address Discrepancies		November	2007
	<i>1. Joint Regulation's Numbering System</i>	November	2007
	<i>2. Identity Theft Prevention Program</i>	November	2007
	<i>3. Different Risk Profiles</i>	November	2007
	<i>4. Definition of "Red Flags"</i>	November	2007
	<i>5. Elements of a Program</i>	November	2007
	<i>6. Administration of Program</i>	November	2007
	<i>7. Interagency Guidelines</i>	November	2007
	<i>8. Listing Appropriate Red Flags</i>	November	2007
	<i>9. Detecting Red Flags</i>	November	2007
	<i>10. Preventing/Mitigating Identity Theft</i>	November	2007
	<i>11. Updating the Program</i>	November	2007
	<i>12. Administering the Program</i>	November	2007
	<i>13. Other Legal Requirements</i>	November	2007
	<i>14. Address Discrepancy on Consumer Report</i>	November	2007
D.O.D. Lending Regulation for Servicemembers		October	2007
	<i>1. Background</i>	October	2007
	<i>2. Regulated Categories of "Consumer Credit"</i>	October	2007
	<i>3. Three Loan Categories That Apply</i>	October	2007
	<i>4. Need to Identify Every Covered Borrower</i>	October	2007
	<i>5. "Covered Borrower Identification Statement"</i>	October	2007
	<i>6. Which Applicants Should Fill Out the Identification Statement?</i>	October	2007
	<i>7. Special Provisions Applying to All Covered Loans</i>	October	2007
	<i>8. "Military APR" (MAPR); Other Required Disclosures</i>	October	2007
	<i>9. "MAPR" Limited to 36%</i>	October	2007

Title	Subtitle	Month	Year
	<i>10. No Renewal of Debt</i>	October	2007
	<i>11. Other Prohibited Practices</i>	October	2007
	<i>12. Criminal Provision</i>	October	2007
	<i>13. What's a "Covered Borrower"?</i>	October	2007
Servicemembers' Civil Relief Act—Impact on Lenders		September	2007
	<i>1. Transition to Active Duty.</i>	September	2007
	<i>2. Written Waiver by Servicemember or Person Secondarily Liable.</i>	September	2007
	<i>3. Interest-Rate Reduction.</i>	September	2007
	<i>4. Foreclosure of Mortgage is Invalid.</i>	September	2007
	<i>5. Reamortization of Mortgage Indebtedness.</i>	September	2007
	<i>6. Protection of Servicemember against Default Judgments.</i>	September	2007
	<i>7. Verifying Someone's Active Duty.</i>	September	2007
	<i>8. Setting Aside a Default Judgment.</i>	September	2007
	<i>9. Servicemember's Right to Stay Legal Proceedings.</i>	September	2007
	<i>10. No Fines or Penalties.</i>	September	2007
	<i>11. Stay to Prevent Execution on a Judgment, Attachment or Garnishment.</i>	September	2007
	<i>12. Protecting Persons Jointly or Secondarily Liable.</i>	September	2007
	<i>13. Personal Assets Pledged on Business Debt.</i>	September	2007
	<i>14. Installment Purchase Contracts (Dealer Paper).</i>	September	2007
	<i>15. Reamortization of Payments Owed on a Contract.</i>	September	2007
	<i>16. Appraisal Procedure for Repossession.</i>	September	2007
	<i>17. No Reporting of Bad Credit.</i>	September	2007
	<i>18. Termination of Motor Vehicle or Real Estate Lease.</i>	September	2007
	<i>19. Protection from Eviction for up to Three Months.</i>	September	2007

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	<i>20. Enforcement of Lien on Servicemember's Real or Personal Property.</i>	September	2007
	<i>21. Extension of Statutes of Limitation.</i>	September	2007
Background on Subprime Mortgages		August	2007
	<i>1. ARMs vs. Fixed-Rate Mortgages</i>	August	2007
	<i>2. "Low-Initial-Payment" Mortgages</i>	August	2007
	<i>3. Mortgage Suitability</i>	August	2007
	<i>4. Foreclosure Rates</i>	August	2007
	<i>5. Refinancing: A Way Out?</i>	August	2007
Interagency Guidance on Subprime Mortgages		August	2007
	Statement's Coverage	August	2007
	What is "Subprime"?	August	2007
	Substantial Risk Factors	August	2007
	Balloon Payments?	August	2007
	Consumer Protection Principles	August	2007
	Underwriting Standards	August	2007
	Control Systems	August	2007
Consumer Loan Dollar Amounts Adjust on July 1		July	2007
Changes to Identity Theft Provisions		July	2007
All ATV's Transferred After June 30, 2008 Require Titles & Liens		July	2007
How to Re-title a Mobile Home Merged Into the Real Estate		July	2007
Commissioner's Bill Includes Several Miscellaneous Changes		July	2007
Changes to Oklahoma's Vulnerable Adult Abuse Reporting Provisions		June	2007
	Financial Neglect; Exploitation	June	2007
	Specific Duty to Report	June	2007
	Avoiding Singling out Banks	June	2007
	Expanded DHS Powers	June	2007

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Illegal Immigration: How H.B. 1804 Affects Banks, Other Businesses		June	2007
	Citizenship/Immigrant Verification	June	2007
	Independent Contractor Verification	June	2007
	"Harboring" Illegal Immigrants	June	2007
	Restriction on Issuing ID's	June	2007
	Other Provisions	June	2007
	Economic Costs	June	2007
New Oklahoma Regulations Covering Money Transmitters		May	2007
	<i>1. Little Direct Impact on Banks</i>	May	2007
	<i>2. Money-Transmitter Activity</i>	May	2007
	<i>3. Need for State Enforcement</i>	May	2007
	<i>4. Equal Standards of Compliance</i>	May	2007
	<i>5. License Requirements</i>	May	2007
	<i>6. Financial Requirements</i>	May	2007
	<i>7. Surety Bond Required</i>	May	2007
	<i>8. Net Worth; Investments</i>	May	2007
	<i>9. Agent Funds Held "in Trust"</i>	May	2007
	<i>10. BSA Requirements</i>	May	2007
	<i>11. Additional Recordkeeping</i>	May	2007
	<i>12. Enforcement Authority</i>	May	2007
Returning Checks for "Breach of Presentment Warranty"		May	2007
	<i>1. Authority for Check Returns</i>	May	2007
	<i>2. Presentment Warranties</i>	May	2007
Stale-Dated Checks: Should the Bank Pay Them or Not?		April	2007
	What the Statute Says	April	2007
	Bulk Filing	April	2007
	Regulation CC Exception Hold	April	2007



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	Whether to Pay or Not?	April	2007
	Some Possible Approaches	April	2007
	When is an Old Check No Longer Good?	April	2007
Reasons for Returning Checks within the Midnight Deadline		April	2007
	The Bulk Filing Issue	April	2007
	Having a Valid Reason for Return	April	2007
	Reasons Limited to the Midnight Deadline	April	2007
	"Refer to Maker"; Kiting	April	2007
	"Account Closed"	April	2007
	Forged Checks	April	2007
	Dummy or Counterfeit Checks	April	2007
Stop Payment Orders on Checks – Questions and Answers		March	2007
	<i>1. Can a bank get in trouble for letting the customer place a stop payment order, if the bank knows the customer has a bad motive?</i>	March	2007
	<i>2. Should the bank ask the customer what is his reason for stopping payment?</i>	March	2007
	<i>3. What do you say when the check's payee wants a reason?</i>	March	2007
	<i>4. Does stopping payment automatically reverse the customer's transaction with the payee?</i>	March	2007
	<i>5. In what situations is a stop payment order helpful?</i>	March	2007
	<i>6. Who can give the bank a stop payment order?</i>	March	2007
	<i>7. What if the signers disagree with each other?</i>	March	2007
	<i>8. When is a stop payment order provided quickly enough?</i>	March	2007
	<i>9. What events define "Final Payment"?</i>	March	2007

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	<i>10. What's a "Reasonable Time to Act" on a stop payment order?</i>	March	2007
	<i>11. When does a stop payment order describe a check with "Reasonable Specificity"?</i>	March	2007
	<i>12. Is an online stop payment order effective for six months?</i>	March	2007
	<i>13. For how long is an oral stop payment order effective?</i>	March	2007
No Means of Stopping Payment on Cashier's Checks		March	2007
	Examples: When a bank would like to avoid paying a cashier's check	March	2007
	Is a customer's "defense" against the payee a reason for not paying a cashier's check?	March	2007
	When does a bank have its own defense to paying a cashier's check	March	2007
Joint Guidance on Commercial Real Estate Concentrations		February	2007
	<i>A. What Loans are Covered</i>	February	2007
	<i>B. CRE Concentrations</i>	February	2007
	<i>C. Varying Risk in CRE Loans</i>	February	2007
	<i>D. Why This New Guidance?</i>	February	2007
	<i>E. Cash-Flow-Dependent Loans</i>	February	2007
	<i>F. Some Oklahoma Examples</i>	February	2007
	<i>G. Ongoing Risk Assessments</i>	February	2007
	<i>H. Risk-related Modifications</i>	February	2007
	<i>I. Risk Management Processes</i>	February	2007
	<i>J. Board/Management Oversight</i>	February	2007
	<i>K. Portfolio Management</i>	February	2007
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	<i>N. Credit Underwriting Standards</i>	February	2007
	<i>O. Portfolio Stress Testing</i>	February	2007
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	<i>Q. Capital Adequacy</i>	February	2007
Recent Amendments to Health Savings Account Provisions		January	2007
	HSA Contribution Amounts	January	2007
	Reimbursing Medical Expenses	January	2007
	Accumulating Tax-Advantaged Savings	January	2007
	Full Deduction in First Year	January	2007
	Transfer from IRA to HAS	January	2007
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	Check Conversion..... February	January	2007
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	CIP—Alternative Methods..... March	January	2007
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	Holding Company Debt Levels..... March	January	2007
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	Safe Deposit Box "Access on Death" ..... June	January	2007
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	Small Loan Dollar Adjustments..... May	January	2007
	UCC-1 Searches..... May	January	2007
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	What Transactions are Covered?	December	2006
	"Interest" Limited to 36%	December	2006
	All Fees are "Interest"	December	2006
	New Definition of "APR"	December	2006
	No Lender Access to Bank Account	December	2006
	No Renewal of Debt	December	2006
	No Mandatory Arbitration	December	2006
	Non-complying Contracts Void	December	2006
	Criminal Provision	December	2006
	What Persons are Covered?	December	2006
Pension Reform: Useful Changes to IRA Provisions		November	2006
	IRA Contribution Limits.	November	2006
	Tax Refunds & Other Transfers to IRA's.	November	2006

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	IRA's of Guards & Reservists.	November	2006
	IRA Distributions to Charities	November	2006
	Understanding the Tax Advantages:	November	2006
	50% limit on charitable contributions doesn't apply.	November	2006
	Deductions and credits don't phase out.	November	2006
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	Rollover to "Inherited IRA"	November	2006
	Easier Conversion to Roth IRA's	November	2006
Cleanup Changes in 2006 to Mechanic's Lien Provisions		October	2006
	Background	October	2006
	Obsolete Provisions	October	2006
	What Services Are Covered	October	2006
	Certificate of Title Property with Liens	October	2006
	Change in Time Period	October	2006
	Rental-Related Changes to Section 91	October	2006
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	Assistance in Researching Titles	October	2006
	Property Removed without Permission; Release Obtained by Bad Check	October	2006
	Service Provider's Right to Repossess	October	2006
Payroll Card Accounts & Regulation E Changes		September	2006
	"Payroll Card Account"	September	2006
	DHS Cards vs. Payroll Cards	September	2006
	Is a Payroll Card Useful?	September	2006
	Advantages to Consumers	September	2006
	Employer Considerations	September	2006
	Advantages for Banks	September	2006

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	Payroll Cards Not Mandatory?	September	2006
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	Consumers Who Don't Want Statements	September	2006
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	Reporting to Authorities	August	2006
New Law Provides for Credit Report Freezes		August	2006
	Legislative Background	August	2006
	Security Freeze Request	August	2006
	Authorizing a Temporary Release	August	2006
	Is a "Freeze" a Good Idea?	August	2006
	Assistance with Temporary Releases	August	2006
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	Other Exceptions to Security Freeze	August	2006
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	Notice of Changes	August	2006
	Security Freeze Notice Required	August	2006
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Deceptive Use of a Bank's Name in Soliciting Customers		July	2006
	Insurance Practices	July	2006
	Disclosure of Non-Authorization	July	2006
	Comparing the Statutes	July	2006
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	"Elderly" Defined	July	2006
	"Disabled" Not Defined	July	2006
	"Lacks Capacity to Consent"	July	2006
	"Exploitation" Defined	July	2006
	Criminal Penalties	July	2006

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	Knowledge of Incapacity	July	2006
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	Understanding the Customer's Needs	June	2006
	First-Choice/Second-Choice POD Authority	June	2006
	Charity as POD Beneficiary	June	2006
	Required Notice to Accountholders	June	2006
New Provision for Safe Deposit Box "Access on Death"		June	2006
Consumer Loan Dollar Amounts Adjusting on July 1		May	2006
	a. Increased Late Fees	May	2006
	b. "508B" and "508A" Loans	May	2006
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July 1 Deadline for Continuation Statements for Oil and Gas		May	2006
Searching UCC-1's in Only One Filing Office as of July 1, 2006		May	2006
Duration of Fixture Filings Related to Manufactured Homes		May	2006
Increased Deposit Insurance Limits for Retirement Accounts	"Self-Directed" Requirement	April	2006
	Multiple Accounts	April	2006
	Credit Unions	April	2006
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	Permitted Debt Ratios	March	2006
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	Electronic Check Conversion	February	2006
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	Authorization at POS	February	2006



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	Authorization on Billing Statements	February	2006
	Comparison to ACH Rules	February	2006
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	Advantages for Payees	February	2006
	Disadvantages for Consumers?	February	2006
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	Background	January	2006
	"Medical Information"	January	2006
	Examples of Not Evaluating Credit	January	2006
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	Financial Information Exception	January	2006
	Permitted Gathering of Financial Information	January	2006
	Proper Financial Use of Medical Information	January	2006
	Improper Use of Medical Information	January	2006
	Other Permitted Exceptions	January	2006
	Proper Use of Exceptions	January	2006
	Limits on Re-disclosure	January	2006
	Affiliate Sharing	January	2006
Fed's Warranty of Authorization for "Telephone Checks"		December	2005
	Background	December	2005
	Who Uses "Telephone Checks"?	December	2005
	What Checks are Covered?	December	2005
	Warranty of Authorization	December	2005
	FTC Telemarketing Rule	December	2005
	Interviewing the Customer	December	2005
	Removing the "Midnight Deadline"	December	2005
	Fraud and Errors	December	2005
	Limitation on Returning Checks	December	2005
	The OBA's Involvement	December	2005

Title	Subtitle	Month	Year
Homestead Exemption in Oklahoma Bankruptcies: What's the Dollar Limit?		December	2005
Processing through Dallas Fed Affects Availability Schedule		November	2005
FDIC Guidance on Establishing a Bank Ethics Program	Written Bank Policies	November	2005
	Specific Provisions	November	2005
	a. Safeguarding Customer Information	November	2005
	b. Integrity of Bank Records	November	2005
	c. Strong Internal Controls	November	2005
	d. Speaking Candidly with Examiners	November	2005
	e. Accepting Gifts and Favors	November	2005
	f. Avoiding Self-Dealing	November	2005
	g. Observing Other Laws	November	2005
	h. Other Matters	November	2005
Important Issues in Establishing Tragedy Accounts		October	2005
	Using a Real Payee	October	2005
	Endorsement Risk	October	2005
	Tragedy Victim as Owner?	October	2005
	Tax-Deductible Entity	October	2005
	Setting up a Trust	October	2005
	UTMA Account	October	2005
	Risk-Based Approach	October	2005
	Bank-Sponsored Account	October	2005
Guidelines for Residential Tract Development Loans		October	2005
	Appraisal Methods	October	2005
	Appraising Lots to be Developed	October	2005
	Loan-to-Value Ratios	October	2005
	Single-Unit Construction Loans	October	2005
	Substituting/Releasing Collateral	October	2005

Title	Subtitle	Month	Year
	What is the Loan Amount?	October	2005
	Commitment Duration	October	2005
	Developing Too Many Lots	October	2005
	Loans Exceeding LTV Ratios	October	2005
	L.O.C. Borrowing Base	October	2005
Small Intermediate Banks and Changes in CRA Regulations		September	2005
Post-Closing “Real-Estate-Related” Fees are Finance Charges		September	2005
Banks Sharing Information about Former Employees		September	2005
More Details on Lottery Accounts		September	2005
Public Employees’ Payroll Deductions to Financial Institutions		September	2005
FDIC Statistics for Oklahoma		September	2005
The Bankruptcy Abuse Prevention and Consumer Protection Act of 2005		August	2005
	Bankruptcy Chapter Eligibility for Consumers and Individuals	August	2005
	a. Chapters and Restrictions	August	2005
	b. Credit Counseling	August	2005
	Notices	August	2005
	Exemptions	August	2005
	Statement of Intent, Redemption, and Reaffirmation	August	2005
	Discharge	August	2005
	Needs-Based Bankruptcy, Presumption of Abuse, Means Test	August	2005
	The Automatic Stay	August	2005
“Four-Wheelers” Require Certificates of Title and Lien Entries		July	2005

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	ATV's will have Tax Commission decals (similar to boats), not license tags.	July	2005
Continuing Liens for Repair of Farm Equipment		July	2005
Mechanic's Lien Provisions Changed for Motor Vehicles		July	2005
Changes in Items of Property Exempt in Bankruptcy		July	2005
Amendments to Family Wealth Preservation Act		July	2005
Consumer Loan Dollar Amounts Adjusting on July 1		June	2005
	a. Increased Late Fees	June	2005
	b. "508B" and "508A" Loans	June	2005
	c. Dealer Paper "No Deficiency" Amount	June	2005
Regulation DD's Amendments Cover Overdraft Plans		June	2005
	Background	June	2005
	Expanded Emphasis of Disclosures	June	2005
	Advertising "Free" Accounts	June	2005
	General Advertising Requirements	June	2005
	Misleading or Inaccurate Advertising	June	2005
	Revised Truth-in-Savings Disclosures	June	2005
	Periodic Statement Disclosures	June	2005
	Itemizing Fees by Type	June	2005
Regulators Issue Guidance on Money Services Businesses		May	2005
	Background	May	2005
	Basic Due-Diligence Requirements for All MSB Accounts	May	2005
	Performing Risk Assessments	May	2005
	Risk Indicators	May	2005
	Due Diligence for Higher-Risk Customers	May	2005
	Suspicious Activity Reporting	May	2005

Title	Subtitle	Month	Year
	Review of Existing MSB Accounts	May	2005
	Banks Not Regulators of MSB's	May	2005
	Guidance to MSB's	May	2005
Guidance on the Final CIP Rule		May	2005
Questions & Answers on Health Savings Accounts		April	2005
	1. The deductible on a family-coverage HDHP cannot exceed \$5,150, but a policy can allow annual out-of-pocket expenses as high as \$10,200. What does this mean?	April	2005
	2. Will an HDHP pay for all medical expenses after the deductible and maximum "out-of-pocket expenses" are met?	April	2005
	3. Will being insured under an HDHP help to control medical expenses, in contrast to coverage under a standard low-deductible insurance policy?	April	2005
	4. In what circumstances would an HDHP be an attractive alternative?	April	2005
	5. Is there a timing problem in using HSA balances to pay medical expenses that fall within an HDHP's deductible?	April	2005
	6. How do FSA payments differ from HSA payments?	April	2005
	7. Will an FSA still be available to someone who has an HSA?	April	2005
	8. What expenses can be paid from an FSA?	April	2005
	9. Apart from "cash flow" issues, are there reasons why an employer would contribute to an employee's HSA in installments, rather than in an annual lump sum?	April	2005
	10. Is an HSA exempt from garnishment, levy, and set-off in Oklahoma?	April	2005

Title	Subtitle	Month	Year
	11. Can an HSA be pledged to a lender as collateral for a loan?	April	2005
	12. In what ways would filing tax returns and keeping related records be more complicated for a person who has an HSA?	April	2005
	13. Will an employee with an HDHP have more paperwork to handle, compared to low-deductible health insurance?	April	2005
Banking Agencies' Joint Guidance on Overdraft Protection		March	2005
	1. Background	March	2005
	2. Safety and Soundness	March	2005
	a. Account-Approval Standards	March	2005
	b. Ongoing Monitoring	March	2005
	c. Delinquencies and Charge-offs	March	2005
	d. Call Report Treatment	March	2005
	e. Vendors	March	2005
	3. Legal Risks	March	2005
	a. FTC Act/Advertising	March	2005
	b. TILA/Reg Z	March	2005
	c. Equal Credit	March	2005
	d. Truth in Savings	March	2005
	e. EFT Act	March	2005
	4. Best Practices	March	2005
	a. Marketing and Communications	March	2005
	b. Program Features and Operation	March	2005
Explanation of Health Savings Accounts		February	2005
	Background	February	2005
	What is an HDHP?	February	2005
	What's the Advantage of an HDHP?	February	2005
	What Are the Tax Advantages of an HSA?	February	2005



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