

Title	Subtitle
The Bankers Right of Set-off	
Returning Checks within the Midnight Deadline	
Where can I find...	
Supreme Court Opinions 2024-2025 Term Review	
<i>No July Legal Briefs due to space limitations</i>	
Bankers Q&As	
Changes in UCCC amounts effective 7/1/25	
Lawsuits of interest	<i>Illinois Bankers Assn, American Bankers Assn, et al.</i>
	<i>Studco Building Systems U.S., LLC v. 1st Advantage FCU</i>
	<i>Bank Policy Institute, et al. v FRB</i>
Banker Q&As	Joint ownership, divorce, and death
	Right of rescission, recording mortgage
	TRID closing disclosure, seller paid fee
EFS Central Filing	
Update on the McGirt decision	
Banker Q&As	Medicaid Income Pension Trust
	Advertising free Checking
	Who can LLC or corporate signers on account?
	IRA contributions, owner in RMD
Extension of the McGirt decision to civil lawsuits	
Beneficial Ownership Information Update	
Banker Q&As	Series LLC
	Updating account from ITIN to SSN
	Providing debit cards to fiduciaries
Settlement funds payable to minors Tit. 12 O.S. §83	
It's tax re(fun)d time	

Title	Subtitle
Welcome OBA's General Counsel	
BOI deadlines in limbo	
Interagency Guidance on Elder Financial Abuse	Unclaimed property, cashiers check
Banker Q&As	
Monthly payment of flood insurance	
Right of rescission	
Deceased IRA owner, RMD	
Check your to-do list	
Vulnerable Adult Abuse, Neglect and Exploitation Report	Lien entries on vehicles, manufactured homes
Perfection of security interest	Semi-trailer
	Purchase Money Security Interest, blanket filing
	Reg E
Questions from our members	LLC documentation
	Initial ARM Notice
	Reconsideration of Value Q&As
	OK Uniform Commercial Code Amendments
2024 OK Legislation - Part III	1. Insurance Premium Trust
FAQs - Account Documentation	2. Property Management/Security Deposits
	3. Medicaid Income Pension Trust
	4. Oklahoma Lottery Account
	5. Funeral home/burial Trust Account
	Oklahoma Uniform Directed Trust Act of 2024
	OK Trust Act (Amended) Tit. 60 O.S. §§ 175.01-175.57
2024 OK Legislation - Part II	Registration and Pre-Registration - Transfer of License Plates - Contracts and Agreements for Electronic System - Title 47 O.S. § 1111.2 (Effective 9/1/2024)
	Distributions after probate has closed.
	Safe deposit box, no probate
More Deceased Customer Q&As	

Title	Subtitle
2024 OK Legislation - Part I	
A potpourri of deceased customer Q&As	
Still more on the FDIC's revisions to part 328	
More on the FDIC's Revisions to Part 328	Altered check, indorsement claim
Bankers' FAQs	Multiple payees: Who must indorse?
	Named payee, "Life Tenant"
	Authorized signers on revocable trust accounts
	Joint tenants without right of survivorship, PODs
	Reg E
Changes in UCCC amounts effective 7/1/24	
ATMs (and like devices) and the FDIC's new Advertisement of Membership Rule	
Military Customers - A Protected Class	
Update on the New CRA Regulations	
FDIC Rule Affects ATMs, Websites, Apps and More	
Personal Responsibility	
OBA Feedback	
FCRA and HR	
Employees, Social Media, and Ownership	
Federal Preemption in Question	
Overdrafts - Comments Requested	
'Tis Still the Season — Security and Fraud Losses	
MLOs Hirable Now -- Changes in Section 19	
AI in Banking	
Year End, Year Start	
Loans, ECOA, and Noncitizen Discrimination	Tribal account, public funds
New CRA Final Rule Released	Minor sole member LLC
Deposit accounts questions and answers	Paying higher rate on CD owned by chairman of BOD
	Closing a Medicaid Income Pension Trust Account

Title	Subtitle
	Search warrants
	Flood insurance, property address
	Safe deposit box access on death deputy
Other frequently asked questions	Executive officer - Reg O
	Reg CC and mobile deposits
	Reopening closed accounts
	Non-consumer debit cards
	CTRs - multiple transactions?
	Deceased and surviving PODs
	Funny money
	Dealing with fraudulent checks, positive pay
	Oklahoma Uniform Consumer Credit Code Title 14A
	Title 60 O.S. § 121 – Alien ownership OK real estate
	Title 12 – Garnishment Forms
OK legislation 2023	Title 43A O.S. § Section 10-111.1 - Vulnerable Adult
	Title 58 O.S. § 1252 – Transfer-on-death deeds
	Title 42 O.S. § 91 – Personal property liens
RESPA section 8	
HMDA analysis	
Personal responsibility	
Forms update	
Appraisal bias – Part II	
Reconsideration of value	
1071 – Small Business Lending Rule, Basics	
Appraisal Bias, ECOA, FHA and USPAP – Part 1	
Changes in UCCC amounts effective 7/1/23	
No May Legal Briefs	
Oklahoma Settlements Involving Minors Act of 2022	
Minor as POD beneficiary	

Title	Subtitle
Discrimination update: ECOA and FHA	
Reputation risk and theft	
Deposit mismatches and liability	
Signage management	
SCRA and a new best practice recommended?	
The child support levy moratorium is over	
Has your bank become a HMDA reporter	
Minutiae Matter	
Joint owners' signatures on new joint accounts	
Insider abuses	
HMDA Changes Un-Changing?	
Defunding the CFPB	Garnishment fees, UCCC Secs. 106 and 3-508B
New "Junk Fees"	
Concerns about overdrafts and fees grow - Part 2	
2022 OK Legislative Changes	
Reg O FAQ	
Concerns about overdrafts and fees grow - Part 1	
Repossession and the SCRA	
COVID coughs up and update	
FCRA is on the front burner	
What's new with Reg B? – A Lot!	
Electronic liens	Perfection of Security Interest
Please help us to help you (Part 2)	Electronic Filing of Liens, etc.
Oklahoma Mini-TCPA	
Tit. 47 O.S. § 1110	
Tit. 47 O.S. § 427A/ § 1105A	
Changes to UCCC Amounts Effective 7/1/22	
Help us help you	
Lender credits on the TRID closing disclosure	

Title	Subtitle
MLA and GAP	
Overdraft fees are not interest	
NACHA warranties and old unauthorized ACH debits	
P2P complaints	
Fair banking	
The Beneficial Ownership Rule hasn't gone away	
UDA(A)P is becoming all the rage!	
Reg E FAQs - Part II	
FDCPA Regulations - Part II	Computer-security incident notification
CFPB Reg E FAQs - Part I	
2022 to-dos today	
New Year, new rule	
Foreclosure forbearance reminder	
Don't ignore FDCPA regulations	
New Stuff on Legal Links	OK Banking Code
Regulatory priorities	Judgment liens
Consumer complaints	Motor vehicles
2021 OK legistion - Part III	Tax
	Oklahoma Power of Attorney Act – Part 2
	Oklahoma Consumer Credit Code § 3-508A
	Uniform Interstate Depositions and Discovery Act
	Oklahoma Power of Attorney Act – Part 1
2021 Oklahoma legislation - Part II	
Reg Z's business day definitions	§ 901 – POD beneficiaries
Advance Child Tax Credits and closed accounts	§ 906 – Transfer of deposits or contents of safe deposit boxes to heirs.
2021 Oklahoma legislation - Part I	§ 909 - Powers of Authorized Signer — Form for Additional Powers

Title	Subtitle
Vacations - Required or recommended	
CFPB to mortgage servicers: "Hear us NOW"	
Changes in UCCC amounts effective July 1, 2021	
Dot your i's, cross your t's (employer workplace notice rules)	
Foreclosures and evictions after a pandemic	
Third round of stimulus payments (EIP3)	
Reg B has expanded: What you need to do	
UDAAP U-turn	
More reasons to watch the Bureau	Inquiring about disability and medical exams
	Confidentiality
Happy Anniversary! It's 2020.1! (Another look at COVID-19 workplace and vaccination policies)	New Hires
	Reasonable Accommodations
	Discrimination in the Workplace
	Vaccinations
Closing accounts for undesirable customers	
Military lending rules have teeth	
Second round of stimulus payments	
Accepting OK Real ID receipts	
Special purpose credit programs	
BSA revisions	
Systemic overdraft problems	
Resolving escrow shortages and deficiencies	
An update on the Payday Lending Rule	
FAQs on RESPA Section 8	

Title	Subtitle
The year is nearly over – Loose ends	
Contracts for deed	
Reg D	
Flood program extended	
TRID timing requirement waivers	
SCRA is still in the news	
Advertise this way, everyone is doing it!	Fair lending and HMDA
Trust documents	Fair lending and CRA
Fair Lending—in the News and on Your Radar	Paycheck Protection Program
	Bank of America – disability
	Townstone – redlining
	Fair servicing
	The CFPB's RFI
Mortgage maturity date, 46 O.S. § 301	
Appraisal update	
Reg E error claims and ‘unjust enrichment’	
HMDA thresholds	Mortgage servicing rules
More on the death of savings transfer limits	Fair credit reporting
Corona virus compliance changes	Regs E, DD, and Z - Working with customers
	Statement for credit card issuers and open-end lenders
	Flexibility regarding deposit accounts
	Open-end (not home-secured) loans
	Increased late fee
	§3-508B loans
Changes in UCCC amounts effective 7/1/20	§3-511 loans
	Dealer paper "no deficiency" amount

Title	Subtitle
Work after the corona virus	
Information on Oklahoma campaign accounts	Modify Policies—COVID-19 addendums
Are savings transfer limits dead?	Assisting borrowers
Coronavirus and Assisting Customers	New loans
	Loans past due of about to be
	Regulatory reporting
	Limits on fee, penalty and interest
	Credit bureau reporting
	Management's Actions
	<i>Update</i>
	<i>Education</i>
Coronavirus and Banking Coronavirus and Banking	<i>Responsibilities</i>
	<i>Travel</i>
	<i>Security</i>
	<i>IT</i>
	<i>Vendors</i>
Military lending update	
Perfecting a security interest on a trailer	
Tax season information in <i>Legal Briefs</i>	
Index to Legal Briefs now online	
“Abusive” UDAAP Update – Policy Statement	
Compliance Aids – Policy Statement	
SECURE Act and IRAs	
LIBOR – Transition Plans	

Title	Subtitle
HMDA Guides	UDAAP & GAP
New Home Buyer Savings Account	Credit cards
CFPB Supervisory Highlights	Credit reporting (furnishing)
These OREOs are no treat!	Returns by the midnight deadline
Privacy: It's for bank info, too	After the midnight deadline
Managing returns of duplicate payments	The UCC and checks or images that are duplicate payments
	Returning checks and images that are duplicate payments
	Background
	Oklahoma
Medical marijuana state question 788 and banking issues	Federal Law
	Hemp, CBD
	Agencies issue joint rule
	Important new definition
Residential appraisal threshold raised	Effective dates
	Title 18 – Corporations
	Title 16 – Conveyances
2019 Oklahoma legislation	Title 12A – Uniform Commercial Code – Article 15
	Title 12 – Civil Procedure
	Title 68 – Public Health and Safety
	Title 28 – Fees

Title	Subtitle
Watch for new CTR filing instructions	
HEMP, CBD	
Do cashier's checks expire?	Post-consummation rate reduction
Mandatory vacation for bank employees	Disclosing the cost of credit
Inform your borrower (Post-confirmation rate reduction)	Refinancing or modification?
	Audit concerns
	The fair lending problem
	A \$25 million penalty
	A Reg CC comedy of errors
	A 'High Cost' error in Regulation Z
Two regulation amendments, two errors	
Amendments to Title 47	Introduction
EGRRCPA Update – Part 2	Overview
How to Write Suspicious Activity Reports (SARs)	What to include
	Organization of SAR narrative
	General good practices
	Things not to say
	Conclusion
EGRRCPA Status Update (Part 1)	OBA Legal/Compliance team's new intern
FDCPA	New OBA Legal Links content
New stuff!	
	Increased Late Fee
	§ 3-508B Loans

Title	Subtitle
Changes in UCCC amounts effective 7/1/19	§ 3-511 Loans
	Dealer Paper “No Deficiency” Amount
CFPB’s Spring 2019 Regulatory Agenda	
What to say and not say	
Dead beneficiaries	
Dead joint tenants	
Funds belong to an estate	
Watch your fees	
Complaints	
MLA SNAFU	
Convenience fees on loan payments	
HMDA Reference Chart	
Flood Update	
TILA-RESPA FAQs	
Service member complaints	
Authorized signers	Overview
2nd Amendment Auditors	Safe Harbor
New year, new SAR	Confidentiality
	Prohibition on Disclosures by Financial Institutions
	What may be shared
	Prohibition on Disclosures by Government Authorities
	Reg E § 1005.8
	Reg P § 1016.5
Required year-end housekeeping	If you still need to provide annual notices
	BSA annual certifications
	OFAC reporting
	IRAs, IRS Notice 2002-27

Title	Subtitle
	Reg Z thresholds and updates
	Annual escrow statements § 1024.17
	Fair Credit Reporting Act – Affiliate marketing opt-out § 1022.27(c)
	Regulation O, Annual Resolution §§ 215.4, 215.8
	Reg BB (CRA), content and availability of public file § 228.43
	HMDA and CRA notices and recordkeeping
	Training
	Security, Annual Report to the Board of Directors
	Information Security Program part of GLBA
	Annual MLO Registration § 1007.102
	Miscellaneous
FEMA NFIP snafu	
Residential appraisal threshold unchanged (yet)	
IOLTA accounts	
SCRA – What not to do	
Privacy – Reg. P update	
Notes on beneficial ownership	
Certificates of deposit	
Loans and lines of credit	
Safe deposit box rentals	
Estate accounts	The general rule
Single-member LLCs	Formal and informal trusts
Revocable trusts deposit insurance	Aggregation
	Exception to the general rule
	Who can be a beneficiary
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Title	Subtitle
Complaints update	
The loan estimate and “no cost” loans	
Avoiding the lender credits ‘lock-in’	
UTMA accounts	Recent SCRA enforcement action
Loans to minors	
SCRA update	
	Let’s consider an example
FCRA credit freeze update	An example with the opposite result
Educational loans	
Contracts for necessities	Minor’s legal capacity to contract
Emancipation	Minor as sole owner
Deposit accounts for minors	Joint with minor
HMDA filing update for small reporters	
Disqualification for exemption by CRA ratings	Affected accounts
Effective Dates	What banks should be doing now
FinCEN exemptive relief ending	More about that statement
	Keep alert for developments
	Marklebank
	Community Trust Bank
UDAAP – The long-term risk	

Title	Subtitle
Speaking of UDAAP: TCF overdrafts update	Permissible Loans
Voicemail, phone call, and email etiquette	
Loans to candidate campaigns	CBD Oil
Reefer madness	All accounts need an EIN
	Authorized signers/debit cards
Update: campaign committee, PAC and political party accounts	
	FinCEN's temporary 'exceptive' relief
	Entity as trustee of owner
More on the Beneficial Ownership Rule	Estates as customers
	Estate as owner of a legal entity customer
	Policies lists
	Writing and maintaining policies
Policies – Part 2	
	What you should be doing now
EGRRCPA and HMDA	CTRs
	SARs
AML/BSA Q&As	
	Increased Late Fee
Deregulation is a reality	3-508B Loans
Consumer loan dollar amounts adjust July 1	3-511 Loans
	Dealer Paper "No Deficiency" Amount
	Accounts covered
	New account
Beneficial ownership rules update	Legal entity customer
	Beneficial owner

Title	Subtitle
	Two-part process
	Timing
	Form, format and content of certification
Policies	
Appraisals	
Watch that tax advice!	
Credit reports are changing again	
Telephone Consumer Protection Act – Update	Deceased customers
Sellers’ cost on borrowers’ closing disclosures	Guardians, conservators
OBA website update, <i>Legal Briefs</i> and Legal Links	Trusts
	Prevention is better than a cure
Without the App, you can’t comply with HMDA	
A Revised USA PATRIOT Act/CIP Sign?	
HMDA Signage Correction	Questions and Answers from the Top Gun Conference
Spirit and Intent, SCRA and BMW	
The Beneficial Ownership Rule	
	First things first
UBO: How low do you go?	<i>Where are the Oklahoma child support levy statutes?</i>
“I received a child support levy...”	<i>Who issued the child support levy?</i>
	Continuing levies
	Remitting the funds
	Multiple levies
	Check cashing

Title	Subtitle
Tax Refund Checks	Issuers get another year for implementation
The ADA and the WWW	
Prepaid Accounts Rule Amended and Delayed	
	Funeral expenses
Payday Lending Rule Likely to be Rescinded or Trimmed	Offset and deceased customer
Deceased customer accounts	
Don't sweat the HUD-SCRA expiration, part 2	
Military Lending Act Guidance Update	
Managing risk in mobile deposits (Revised)	Making sure you qualify
Managing risk in mobile deposits (Removed for error)	
The statement exemption for charged-off loans	
Don't sweat the HUD-SCRA expiration	
HMDA notices	Ante
Abundance of caution"	Bona fide
"Legalese" for non-lawyers – Part II	Caveat
	Codicil
	Common law
	Et al
	Inter
	Intra vires and ultra vires
	Jurat
	Lis pendens
	Per curiam
	Pro hac vice

Title	Subtitle
	Per capita and per stirpes
	Pet Peeves
	Probate legal terms
“Legalese” for non-lawyers	Testamentary trust
	Affidavit
	Alter ego
	Amicus curiae
	De facto
	Duces tecum
	Fiduciary
	Guardian ad litem
	In personam
	Reg E § 1005.8
	Reg P § 1016.5
Required year-end housekeeping	BSA annual certifications
	OFAC reporting
	IRAs, IRS Notice 2002-27
	Reg Z thresholds and updates
	Annual escrow statements § 1024.17
	Fair Credit Reporting Act – Affiliate marketing opt-out § 1022.27(c)
	Fair Credit Reporting Act – FACTA red flags report
	Regulation O, Annual Resolution §§ 215.4, 215.8
	Reg BB (CRA), content and availability of public file § 228.43
	HMDA and CRA notices and recordkeeping
	Training
	Security, Annual Report to the Board of Directors
	Information Security Program part of GLBA

Title	Subtitle
	Annual MLO Registration § 1007.102
	Miscellaneous
	Civil Procedure
	Deceased customers
2017 Oklahoma Statutory Amendments	Liens
Real Estate and Money Laundering	Error claims and consumer liability
FinCEN Revises Beneficial Ownership Certification	Example
Consumer Liability Under Regulation E	Timeliness of Sarah's claim
	Calculating Sarah's liability
	The HELOC reporting threshold
Lessons from the American Express settlement	Clarified terms
CFPB's 2017 HMDA Rule amendments	Home improvement loans and mixed-use property
	Income
	Reporting demographic information
Forced-placement of flood insurance, with a twist	First things first
Visa zero liability update	Understanding guardianship orders
"I received guardianship documents..."	

Title	Subtitle
Thoughts on the 120-day foreclosure waiting period	
Servicing Rule amendments	First things first
One more thought on the 120-day rule	What court issued the garnishment?
"I received a garnishment..."	Who is the judgment debtor?
	What type of garnishment is it?
	Name issues
	The TIN doesn't match the one the bank has
	Other situations.
	The creditor sent the wrong forms or did not include a required form
	The garnishment summons was sent to a branch rather than the main bank
	The person who handles our garnishments was out or had left for the day
	Claims for exemption on behalf of the judgment debtor — IRA
	Does your bank qualify for the exception?
	When will you have to send an updated notice?
Are annual privacy notices still required?	
	Error resolution and limited liability
	Credit card accounts linked to prepaid accounts.
Proposed changes to Prepaid Rule	Streamlining pre-acquisition disclosures
	Submission of agreements to Bureau
	Effective date and early compliance
CFPB "special edition" on complaints	
Will the CFPB get SCRA enforcement authority?	Increased Late Fee

Title	Subtitle
"Debt collector" gets a refined definition	§ 3-508B Loans
Consumer loan dollar amounts adjust July 1	§ 3-511 Loans
	Dealer Paper "No Deficiency" Amount
	The TCPA
	FCC Declaratory Ruling and Order 15-72
TCPA compliance for certain alerts	Exempted categories of messages
	Conditions for exemption
	Reassigned cell phone numbers and liability
	Fewer changes than hoped for
	Effective date and waiting for the other shoe
'New and improved' credit reports coming soon	
Amendments to Reg CC – Finally!	Annual Report Overview
	Debt collection
Complaints – What's your status quo?	Credit Reporting
	Mortgage Loans
	Bank accounts
	Credit cards
	Student loans
	Consumer loans
	Summary
	Overview
	Penalties/Effects
Your Corporate Compliance Program	Corrective Actions
	Changes may also be made
Prepaid Accounts Rule Delayed	

Title	Subtitle
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Deceased Customer Accounts	A Visit to the Bank of Blunders (Operations)
Oklahoma Interstate Succession Laws Chart	A Visit to the Bank of Blunders (Lending)
Blunder Report	
	Request for comments on proposed delay
Labor's Fiduciary Rule Likely Delayed	A Visit to the Bank of Blunders (Operations)
	A Visit to the Bank of Blunders (Lending)
Bank of Blunders 2017	
Updated Lobby Signage	
Deregulation?	
Penalty caps increasing, again	
Annual adjustment for 2017	
Where to find the current caps	
Selected examples	Reg P § 1016.5
Penalty Caps Increasing, Again	Reg E § 1005.8
Unfinished Business	BSA Annual Certifications
	OFAC
	IRAs, IRS Notice 2002-27
	Reg Z and C Thresholds and Updates
	Annual Escrow Statements § 1024.17
	Fair Credit Reporting Act – Affiliate Marketing Opt-Out § 1022.27(c)
	Fair Credit Reporting Act – FACTA Red Flags Report
	Regulation O, Annual Resolution §§ 215.4, 215.8
	Reg BB (CRA), Content and availability of Public File § 228.43
	HMDA and CRA Notices and Recordkeeping
	NACHA ACH Audit

Title	Subtitle
	Vendor Due Diligence
	Holidays
	Training
	Security, Annual Report to the Board of Directors § 208.61
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	Annual MLO Registration § 1007.102
New Business	
DOL's Overtime Rule Blocked	Purposes of the W-9
Reg Z, Reg M Thresholds	Information required on the W-9
Form W-9	<i>Sole proprietorship</i>
	<i>Disregarded Entity – Grantor Trust not filing Form 1041 or optional Form 1099</i>
	<i>Disregarded Entity – Sole member LLC</i>
	<i>Multi-member LLCs.</i>
	<i>Corporations</i>
	Tax treatment election
	Who can release a mortgage
	Must the spouse sign the mortgage secured by commercial real estate?
Questions & Answers	Waiver of homestead
	Recitation of marital statuts
	Purchase, non-borrowing spouse not in title
	Name discrepancy
	New forms
	Expected issues and solutions

Title	Subtitle
More on the OK Garnishment Fee	
	Both Regulations X and Z affected
Next up, the MLA inspection	Effective dates
Mortgage servicing rules update	
Borrower's principal residence	
Definition of "delinquency"	
Force-placed insurance	
Evaluating loss mitigation applications	
Early intervention – live contact	
Early intervention – written notice	
Successors in interest	
Consumers in bankruptcy	Banking Code
More on the effective dates	Savings and Loan Code
2016 Oklahoma Statutory Amendments	Garnishments
	Small Estate Affidavit – Probate Code
	Guardian and Ward
	Eminent Domain, Mortgagee Liability
	Title 58 Small Estate Affidavits.
	Changes to the Flood Form
	Changes to the URLA
Are Your Forms Files Up to Date?	
MLA Guidance is Here!	
ODFI Warranty Risk under NACHA Rules	Household account exception
Unclaimed property and safe deposit boxes	Exception for showing a beneficiary's ownership of funds

Title	Subtitle
Rep payee accounts	
Proposed TRID Rule Changes	FAST Act provision gets CFPB action
Your questions: our answers	
Bureau to implement GLBA privacy notice relief	How do you approach the task of keeping your bank in compliance?
Everyone's tweaking their CMPs	We can derive incredibly useful guidance from enforcement actions
Using enforcement actions	
"Loans" to counties, schools, and municipalities	Same Day ACH
Is it a refi?	Testing
U3C: No change in late fee, dollar amounts	Modified mid-day FedForward deposit options
	Changes to FDIC's Summary of Deposits survey
	Coming this summer
Operational Odds and Ends	Over the horizon
Updated plans from the Bureau	
	Overview
	Overtime Basics
Sudden Overtime Changes	Overtime Options
	Change Management
	Death or incapacity of the corporation's sole shareholder.
Landscape for Balloon QMs has changed	Death or incapacity of the LLC's sole member
Corporations and LLCs – Part II	Dissolution of a corporation

Title	Subtitle
	Dissolution of an LLC
SCRA amendment enacted	
Title 50 gets an “app-endectomy”	Federal and Oklahoma state income tax refunds payable to a deceased account holder
Guarantors not “applicants” under ECOA	Oklahoma Tax Refund Debit Cards
’Tis the (tax refund) season – Part II	
	Be prepared to change
Flood rule could ruin your HPML escrow exemption	
Compliance management: basic thoughts	Determine who the judgment debtor is
’Tis the (tax refund) season	A garnishment also attaches to a safe deposit box owned/leased by the judgment debtor
Garnishment gotchas	
Old POD designations	
MLA – Clarity	
You have questions, we have answers	
Requests for customer information from other states	
Purchase money mortgage, spouse not on deed	
Safe deposit boxes	
Trust as POD	Gotchas!
Banning guns on premises	
Privacy Notice Changes	
Settlement Fee May Be a Finance Charge	

Title	Subtitle
Limits on Releasing Funds of Decedent under Section 906 of the SBC	
Effect of Divorce or Annulment on POD Accounts	
Reg O Executive Officer Loan Limits	
Pulling Credit Reports on Individuals	
Releasing Customer Records with Authorization	
Limits on Refinancing Certain Balloon Loans	
Loans to Non-U.S. Citizens	
When You Haven't Got Everyone on the Same Page	
The TRID Rule's "Alternate Tables"	
Reg DD Balance Disclosure Rule, ODP Access	Reg E § 1005.8
Pre-deceasing POD Beneficiaries	Reg P § 1016.5
It's Year-End: Have You Finished All the Annual Tasks?	BSA Annual Certifications
	OFAC
	IRAs, IRS Notice 2002-27
	Reg BB (CRA), Content and availability of Public File § 228.43
	HMDA and CRA Notices and Recordkeeping
	Training
	Security, Annual Report to the Board of Directors § 208.61
	Information Security Program part of GLBA
	Annual MLO Registration § 1007.102
	Other
	Difference in emphasis
	U3C: Credit sales and loans
Reg Z v. the UCCC – Part II	Maximum interest rate
	Differences in disclosures of certain fees

Title	Subtitle
FDIC's update on payday lending	Why the OHCA asking for account balances
Key SCRA date approaching	Right of privacy
OHCA requests for asset verification	
	Loans excluded from the U3C but are subject to Reg Z
	Real estate loans excluded from certain U3C provisions
Reg Z vs. UCCC – Part I	“Fresh Start Loans” excluded from Reg Z are subject to the U3C
HMDA – Yes, Another huge change in what you do	Title 46 O.S. § 15 Holder Must Release – Penalty
Amendments to OK Statutes effective 11/1/15	
TIMELY RELEASE OF MORTGAGES	Title 47 O.S. § 1110 Perfection of Security Interest
TIMELY RELEASE LIEN ENTRIES ON MOTOR VEHICLE CERTIFICATES OF TITLE	Title 58 O.S. §1074 Relationship of Court-appointed Fiduciary and Attorney-in-fact
	Title 58 O.S. §1075 Effect of Death or Incapacity of Principal
AMENDMENTS TO OKLAHOMA'S DURABLE POWER OF ATTORNEY ACT	AMENDED ARTICLE 9 – PART II
	§ 1-9-102 Definitions and Index of Definitions.
	§ 1-9-105 Control of Electronic Chattel Paper
	§ 1-9-316 Effect of Change in Governing Law
	§ 1-9-326 Priority of Security Interest Created by New Debtor

Title	Subtitle
	§ 1-9-518 Claim Concerning Inaccurate or Wrongfully Filed Record
	§ 1-9-521 Uniform Form of Written Financing Statement and Amendment
	TRID deadline looms
Welcome Words on TRID	
Integrated Disclosures Crunch Time	§1-9-102 Definitions and Index of Definitions
	(a)(71) "Registered organization
MLA – the Final Rules	(a)(68) "Public organic record
Amended Article 9 – Using the Correct Debtor Name	§ 1-9-503 Name of Debtor and Secured Party
	§ 1-9-506 Effect of Errors or Omissions
	§ 1-9-507 Effect of Certain Events on Effectiveness of Financing Statement
	§ 1-9-805 Effectiveness of Action Taken Before Effective Date
	A technical glitch
	August 15 or October 3?
TRID rule postponed	
	What is a lender to do?
The SCOTUS disparate impact ruling	Use your time wisely.
	How did we get here?
Small wave of flood changes, but watch the riptide	Biggert-Waters and HFIAA Amendments
	New Rule – Specifics

Title	Subtitle
Good news on UTMA accounts	
Article 9 tweaks (finally!)	
FCRA lawsuits	
Expiry date passed on your flood notice	
SCRA – What have we learned recently?	
No changes in U3C late fees, dollar amounts	
U3C Sec. 3-508A amended	
I see dead people – Part 2	Other loans
New UTMA Amendment	Relationship to new disclosures
The Bureau's new RESPA booklet	When to start
	Updates to exam manual
	Revised implementation materials
More TRID rule announcements	
A reminder on treasury ACH benefits changes	
It's more than mortgage lenders hours	
Airing dirty laundry in public	
I see dead people	
Next compliance roundtable	
Two phrases I hate to hear	Rate-lock-related revised Loan Estimates
Regulation Z changes	Name and NMLSR ID on documents
Final rule affecting integrated disclosures	Loan Estimates for construction loans
	Disclosure of prepaid interest
	Drafting error in Regulation X
	Higher loan origination limit
	A zinger added to the asset limit

Title	Subtitle
Proposal to expand small creditor definition	A return to the one-year look-back for the “rural” or “underserved” counties criterion
	Changes to definition of “rural.”
	Changes to QM rules
	And something for credit card issuers
Lotteries are now OK — “It depends”	
Help us help you	Bank Secrecy Act
FAQs for direct deposits of IRS refunds	Insider lending
Being a smart bank	Credit cards for business use
	Lending discrimination
	Debt collection practices
	Servicemember lending issues
	Bad guys in the bank
	Add-on products
	Falling through the compliance cracks
Groundhog day	
Tweak, tweak	
For a good read	The IRA Rollover Rule Prior to January 1, 2015
Progress in the subpoena wars	What Changed
IRA rollover rules	The Transition Rule
	Tax Consequences
	What it is
	Surnames, Addresses and CIP
Common law marriage	Ways to prove marriage

Title	Subtitle
Keeping track of annual inflation adjustments	
Every January brings change	
HMDA	“Threshold amount” for Regulation Z coverage
CRA	High-Cost Mortgage Loan (HOEPA) points and fees triggers
Key Regulation Z amounts	“Small creditor” HPML escrow exemption amount
	Threshold for exemption from HPML appraisal requirements.
	Confusion over the expired form
HUD-SCRA required notice	
Disparate impact – Why this case is important	<i>Coverage</i>
Tit. 42 O.S. §§ 91 and 91A amended	<i>Notice of Possessory Lien</i>
Title 42 O.S. § 91	<i>Inspection of property and retrieval</i>
	<i>Notice of Sale</i>
	<i>Claimant must strictly comply with the statute</i>
	<i>Damages and penalties</i>
	<i>Coverage</i>
	<i>Notice of Possessory Lien</i>
Title 42 O.S. § 91A	<i>Inspection of property and retrieval</i>
	<i>Notice of Sale</i>
	<i>Claimant must strictly comply with the statute</i>
	FinCEN’s statement
	OCC’s Bulletin 2014-58

Title	Subtitle
FinCEN, the OCC, MSBs and Regulatory Risk	Analysis
Privacy notice — final rule	
QM cures	
Servicing guidance	
Reg O — alive and being violated	
Flood insurance proposed rule	
Counties — rural or underserved	
Get it right the first time	
RESPA Sec. 8 kickbacks	
Redlining	
When "free checking" isn't	
Wells Fargo's maternity leave fiasco	
Military lending changes proposed	
Correcting direct deposits	
A lesson for mortgage servicers	
Trust your vendor, but verify	
Costly lender errors	What is the purpose of the UPA?
Exemption threshold going up	When do holders have to report unclaimed property?
Unclaimed property	When is property presumed to be abandoned?
If you're a HMDA reporter	
SCRA is still in the news	The Bureau makes more changes
Reg. AA — Gone but not forgotten	The extension
Revisiting foreign remittance transfers	Faxed disclosures
	Expansion of oral disclosure situations
	Military bases abroad

Title	Subtitle
Integrated disclosures: Countdown begins	
Bureau issues overdrafts reports	
FDIC: You misunderstood what we said	
When your OFAC tools aren't working	
What's up with those old Fed regulations	
Marriage equals marriage	
HELOC guidance	
Speaking of risk management	
Social media checkup	
4.1M CMP for deceptive practices	
Apps from new parents	
ITIN expirations	
ATR interpretive rule	
SAR stats & other BSA matters	
Watch those cards!	
HMDA reg proposal	Fed and state order \$51 million in penalties
SCRA	
Cooked books put bank in hot water	
RESPA penalties get personal	
FDIC hits Missouri bank with RESPA violations	
Regulators tout improvements	
More call report changes coming	
Guides for assisted living and nursing home staff	3-508A Loans
Current account takeover cases — lessons learned	Maximum Rates by Tier Amounts
Section 3-508A amended	The Dollar Amounts Of §3-508A Loans Will NOT Adjust Annually!

Title	Subtitle
	Alternative Maximum Rate
	Minimum Loan Term
	Increased Late Fee
But is the U3C applicable?	3-508A Loans
U3C late fee, small loan amounts change	3-508B Loans
	3-511 Loans
	Dealer Paper “No Deficiency” Amount
SSNs and ITINs	Agencies respond to lender questions
New implied SCRA requirements	
Last-minute flood insurance guidance	Some Examples of Consideration
Keeping customers happy	§ 1290.22, as amended effective November 1, 2013, provides
	The changes to the statute are
No guns?	
Prohibition on firearms in locked vehicles on bank property	
Signage	
Enforcing a no gun policy	Credit Cards
Policy and liability to employees	Mortgages
CFPB reports on service members complaints	Bank Accounts
	Vehicle and Consumer Loans
	Credit Reporting

Title	Subtitle
	What it all means
FRB debit card interchange fee upheld	
	General principles
Regulation E slips earn another bank a penalty	Federal vs. state
Where to find what you're looking for	Statute vs. Rule
	What to find in federal law
	What to find in state law
	Title 15. Contracts
	State Banking Code. Title 6
	Money orders
	Financial Privacy
	Electronic records
	Protection against discovery
	Negotiable Instruments. Title 12A
	Bank Deposits and Collections, Title 12A
	Funds Transfers, Title 12A
	Secured Transactions, Title 12A
	UETA, Title 12A
	Real estate matters, Title 16
	Right of offset, Title 42
Lessons from the Chase 'Madoff penalties'	
FDIC tech assistance video series	
Bureau is looking for mortgage 'pain points'	
Revised consumer booklets	
Still handling paper items?	
Cross-Collateralization	
Garnishments — When all funds are protected	

Title	Subtitle
Record retention — Part 1	<i>Examine where you are in terms of threshold numbers.</i>
Regulation and retention period	<i>Understand the new account before you open it</i>
Resolutions for your bank to consider	<i>Handle tax refunds properly</i>
	<i>Bone up on campaign accounts</i>
	<i>Watch out how you handle payment of funeral expenses</i>
	Title 58 O.S. Sec. 591
	Delayed effective date will provide needed relief
Dodd-Frank readiness	25-acre exemption gone
Integrated mortgage disclosures finalized	GFE and HUD-1 forms aren't going away entirely
	Timing for Loan Estimate
	Another waiver provision
	Advance delivery of Closing Disclosures
	Responsibility for Closing Disclosures
	Oops, something changed!
	New Regulation Z sections
	New Model Forms
	"All-in" APR proposal excluded
	More analysis to come
FinCEN definitions changes	
CFPB regulatory agenda	
Exemption thresholds creep upward	New Guidance Issued
Q & A on the Dodd-Frank rules	
Fair lending and qualified mortgages	Trust DBA as sole proprietorship
	Trust DBA as a corporation

Title	Subtitle
Till death do we part	When the Trust indicates the account is in the Trust but your account records don't
	Pay on death beneficiary who predeceases the customer
	Pay on death beneficiary who dies after the customer but before funds are distributed
Interest bearing accounts, dormancy fees and unclaimed property.	
HUD's new qualified mortgage proposal	Change in terms
More on certificates of deposit	Notice before maturity for time accounts longer than one month that roll over
CDs and TISA subsequent disclosures	Maturity notices for non-renewing CDs of longer than one year
IRA CDs	Size
The four "smalls"	Number of transactions
HPML Escrow Small	Property location
	Limited escrow history
Small Servicer	
ATR/QM Small Creditor	
ATR/QM Small Creditor Plus	
Durable POA witness requirements	
Changing your early withdrawal penalties	

Title	Subtitle
Armored-car answer from FinCEN (But...)	
Changes to rural and underserved counties list	
Anatomy of an E-SIGN violation	Other issues
What bankers wish customers knew – Part two	
Notice of title protection document	
Responsible conduct	
Exam workpapers – Reg Z	
(Amended) Ability to repay rules hot off the press	
If your bank issues reloadable prepaid debit cards ...	
Treasury still issues some paper checks	
When federal ACH payment names don't match up	§212.3 – Definitions
What bankers wish customers knew	§212.6 – Rules and procedures to protect benefits
Garnishment of Federal benefits rule revisions	§212.7 – Notice to account holder
	Increased Late Fee.
	"3-508B," "3-508A" and "3-511" Loans.
Consumer loan dollar amounts adjust July 1	Dealer Paper "No Deficiency" Amount.
The first California/Achieve financial settlement	
Breach of contract	
Final(?) ability to repay and qualified mortgage rules	
Interagency statement on Biggert-Waters Flood Insurance	

Title	Subtitle
CFPB ability to repay – QM clarification proposal	
Some tweaks for HDMA getting it right	
Escrow rule: What we should have said is ...	
CARD Act rule revised	
NAME IT: A guide to formulating a formidable name for your bank	
Oklahoma’s Article 9 remains unchanged	
Oklahoma tax on IRA part 2:	
Traps for the Unwary	
FFIEC Social Media Guidance – Proposed	Why am I writing about this process?
Compliance and Risk Management	
A World of Two Names	
	Background
Extended Escrows Under Reg Z	Coverage
ATR and QM	Consequences for non-compliance
	Underwriting
Refinancing existing loans	Getting protected
Safe harbors	Another wrinkle
QM product features	Additional definitions
	Possible changes
	New rate-change notices (§1026.20(c) and (d))
	The new standard rate-change notice
The new mortgage servicing rules	The new special first rate-change notice
	Payment processing (§1026.36(c)(1) and (2))
	Payoff statements (§1026.36(c)(3))
	Periodic statements (§1026.41)

Title	Subtitle
	Timing
	Small servicer exemption
	RESPA Servicing Requirements
	New timely escrow disbursements requirement (§1024.34(a))
	New escrow refund requirement (§1024.34(b))
	New error resolution procedures (§1024.35)
	Information requests (§1024.36)
	Force-placed insurance provisions (§§1024.17(k) and 1024.37)
	Servicing policies, procedures and requirements (§1024.38)
	Record retention requirements
	Early intervention requirements for certain borrowers (§1024.39)
	Continuity of contact (§1024.40)
	Loss mitigation procedures (§1024.41)
	Appraisal Rules for HPML/HPML-Flips (§1026.35(c))
	Appraisal Requirements for All HPMLs
New appraisal rules	Exemptions from the Appraisal Requirements
	“Flipped” Dwellings Require a Second Appraisal
	Exemptions from the Second Appraisal Requirement
	Disclosures, Timing and Providing Copies of Appraisals
	Appraisal Rules under Reg B
	Military Lending Act
Lending to the military – the CFPB’s new role	Recognition v. Enforcement
	Federal and state courts
Out of state, tribal and CFR court orders	Tribal and CFR courts

Title	Subtitle
ATM notice relief	
Hot topics for 2013 from the FRB	
COPPA update	Foreign taxes and institution fees
Deposit insurance reminder	Elimination of sub-national taxes
Remittance transfers: a brief reprieve	The big concern: Wrong account information from sender
	Postponed effective date
	Comment deadlines
Religious headgear and compliance	
Corporate Account Takeovers	
ATMs and the ADA	
Q&As on Getting Rid of Customer Property	
Foreign Remittance Transfer Rule to Change – Again	
FDIC Guidance on the Scheduled End of Unlimited Deposit Coverage	
MRAPLA Disclosures Postponement	
Reg Z's Exemption Threshold Goes Up Again	
Update on the Foreign Remittance Transfers Rule	
Updated CFPB Exam Manual and Supervision Findings	
Bureau Posts Supervision Findings and Updated Exam Manual	

Title	Subtitle
Planning for an Employee's Absence Series: Garnishments	
It's That IRA Time of the Year, and Yes, Virginia, You Do Need to Withhold Oklahoma Taxes	
Qualified Mortgages	
IRA Time of Year	
Qualified Mortgages	
Reg Z, Late Fees and the Single Pay Note	
New Safe Deposit Law	
The Second Appraisal	
Proposed Homeownership Counseling Changes	
Tips for Reading the Proposals	
Stopping Payment on Cashier's Checks	
"Safe Harbor" Provision in Reg E's Remittance Transfers Rule	
CFPB Proposal Status Update	
Your Latest Q&As	
Correcting Social Security ACH errors	
Lessons from the PATCO ruling	
Abandoned foreclosures proceeding	
Oh, no! My customer is in bankruptcy!	
Q&As on OREO	
Complaint Responses	
FDIC Insurance Fees	
ATM Notices	
Biggert-Waters: Flood Insurance Reform Act	
Servicemembers Civil Relief Act – Renewed Importance?	
Family Trust	
Property Tax Default	
Escrow Analysis Statement	

Title	Subtitle
ACH Question	
Garnishment	
Free Checking Account	
Change in Terms	
Bank-owed Money-payments	
HPML Question	
Deceased Customer	
State Tax Levy from California	
APR Item	
Social Media, After Hours	
SCRA – Interest Rate	
Gift Card ATM Fee	
ATM ADA Compliance	
Customer E-Banking Question	
Regulation CC Question	
CTRs and Banks	
Tribes and Sovereign Nations	
Branch Designation	
POS Transactions Closing Accounts	
Endorsement Verification	
Business (Lottery) Account	
ATMs and the ADA	
Escheatment and Setoff of Cashier's Checks	
Supreme Court Rules in RESPA Fee Case	
ATM Disclosures	
UTMA Accounts and the Custodian That Just Won't Let Go	
Consumer Loan Dollar Amounts Adjust July 1	
Fair Housing Poster Update	
Agency Updates	
Sole Proprietorships and General Partnerships	

Title	Subtitle
S.A.F.E. Act Guidance	
Fair Lending	
Common Violations in 2011	
'Tis the Season – For Tax Refund Fraud	
Bureau Clarifies Reg Z Loan Officer Compensation Rule	
Mining the OCC's Citibank C&D for Nuggets	
Mortgage Servicing Change is in the Wind	
NOW Account Eligibility	
Mobile Banking Survey	Beneficial ownership
CFPB Complaints	FinCEN's Questions
FinCEN's Notice on CDD	
Paperless Treasury Payments	
More Call Report Changes Coming	
FHA Mortgage Pricing Cuts	
SAFE Act Exam Procedures Posted	
Extra Time to Respond to Comments	
Checking Out Non-profits	
CTR Guidance – Businesses with Common Ownership	
Overdrafts and UDAP	
MLO Compensation Issues	
FDIC Helps with Understanding Cards	
Mortgage Fraud Update	
SAR Confidentiality	
Playing with your Regulatory Numbers	
Deposit Insurance Coverage Training	selection of questions and answers from the compliance team that cover a broad spectrum of problem areas

Title	Subtitle
Payment Processor Relationships	
FAQs	Regulation O
	SAFE Act MLO Registration
<i>Compliance To-Dos for the New Year</i>	Vendor Due Diligence
	Annual Security Report
	Information Security Report – GLBA
	ACH Audit
	FDICIA Annual Audit
	Reg E Error Resolution Notice
	Reg P Privacy Notice
	Escrow Statements
	CRA Public File
	Records Disposal
	<i>Documentation for Corporations and LLCs</i>
	<i>(More than) a few words about names</i>
<i>Corporations and LLCs</i>	<i>Information contained in the Certificate of Incorporation and the Articles of Organization</i>
	<i>EIN or SSN</i>
	<i>By-Laws/Operating Agreement/Minutes/Resolutions</i>
	<i>Foreign Corporations and LLCs – Domesticate or Not</i>
	<i>Can corporations and LLCs have a DBA?</i>
	<i>Can a sole shareholder corporation or sole-member LLC add a POD?</i>
	<i>What exactly does this mean for banks that are contemplating paying interest on demand deposit accounts?</i>
	<i>History provides perspective</i>
<i>Reg Q—Gone, but Not Forgotten</i>	<i>What about NOWs?</i>

Title	Subtitle
<i>FDIC Talks Internet Banking</i>	
<i>HMDA LAR Update</i>	
<i>SAFE Act Renewals</i>	
<i>Payment Order</i>	
<i>The BCFP "Gets It"</i>	
<i>The Big "Why" – Part 3</i>	Insurable Value
<i>Q&As</i>	Force Placement
<i>Updated Flood Guidance</i>	Proposed Q&As
<i>OCC Reg E Booklet Revised</i>	Commercial Real Estate Loan Problems
<i>Farewell to Paper Savings Bonds</i>	ADC Loans
<i>Enforcement Actions</i>	UDAP and the Overdraft Program
	Compliance Management
	Eligible Depositor.
	Reg E – Error Resolution
	Worthless Clicks
	Worthwhile Clicks
Examiners Can Be Too Soft	• Small Estate Cash Release
<i>The Big "Why" – Part 2</i>	• Protection and Preservation of Property During Foreclosure
State Statutory Changes	• Time limit for customer to sue on indorsement problem
	• Minor garnishment changes

Title	Subtitle
	• SCRA
	• EFAA
The Big Why	• BSA
	• ECOA
	• HMDA
	Financial Statements
Business Continuity Planning	HMDA
Examination Buzz	Flood Insurance
	FDIC Signage
	OFAC
	Debt Collection
	SCRA
	Fair Lending
	Strange Transactions
CFPB Action	
Watch Your Mortgage-Related Fees	
Major Anti-Steering Case	
Foreclosure Policies and Procedures	
Q&As on Recent Changes to Regs B and V	
CFPB Powers Up	
SAFE Registration Deadline Passes	
Check Your Email Signature Line	
Change Your AAN Address	
Updated Authentication Guidance Issued	
Risk Management on Prepaid Cards	
Debit Card Interchange Fees	

Title	Subtitle
RESPA Reg Clarified	
Reg B/FCRA Notice Change	
Changes to the Risk-Based Pricing Notice	Changes to the Summons
THE CALM BEFORE THE STORM	Changes to the Answer
REVISED OKLAHOMA GARNISHMENT FORMS	<i>Change to the Notice of Garnishment and Exemptions</i>
	<i>Other matters</i>
	Affected institutions
GARNISHMENT QUESTION OF THE MONTH – BANKRUPTCY	Statement of Principles
OCC “DROPS THE OTHER SHOE” ON OVERDRAFTS	Disclosure
	Legal compliance
	Affirmative request
	Availability and prudent eligibility standards
	Prudent limitations on product costs and usage
	Monitoring and risk assessments
	Management oversight
	Account management and charge-offs
	Applicability to Overdraft Protection Programs (Appendix A)
	Program Availability and Prudent Eligibility Standards
	“Opt-out”
	Disclosures
	Monitoring and Risk Assessments
	Suspension, termination and charge-offs
	Affected products
	Statement of Principles

Title	Subtitle
OCC'S PROPOSED GUIDANCE ON "DEPOSIT ADVANCE"	Applicability to Deposit Advance Programs (Appendix B to the Proposed Guidance)
	Program Availability and Prudent Eligibility Standards
	"Opt-out"
	Disclosures
	Repayment terms
	Monitoring and Risk Assessments
	Management oversight
	Charge-offs
REG Z AMENDED – DON'T BLOW THIS OFF	
MORTGAGE DELINQUENCY NOTICE UPDATE	Garnishment fees
MID-YEAR CHECKUP	Tax Levies
Federal Garnishment Regulation Update	Institution policies
	Which balance to use?
	Brokerage accounts
	New Garnishment Orders
LESSONS LEARNED IN MORTGAGE FORECLOSURES	
Exam Procedure Changes: SCRA and Tenants in Foreclosure Act	
You asked for it...Combined GFE/TIL	Increased Late Fees.
Reg Z Exemption Amount Increased/Reg Z and Oklahoma's Uniform Consumer Credit Code("U3C") Coverage Compared	"508B" and "508A" Loans
Consumer Loan Dollar Amounts Adjust on July 1	Dealer Paper "No Deficiency" Amount

Title	Subtitle
	Coverage
	Forbearance
The Interagency Appraisal and Evaluation Guidelines	Inadequate Appraisal and Evaluation Programs
	Major Guidance Topics
	Automated Valuation Models and Broker Price Opinions
	Re-use of an Appraiser for Another Lender
	Third Party Arrangements
	Referrals
	Section I: Automated and ad hoc programs
	What parts of the Guidance would apply to institutions with ad hoc overdraft decision-making?
FDIC Posts OD Guidance FAQ	Section II: Excessive Use and Meaningful Follow-up
	What is meaningful and effective follow-up for chronic or excessive use?
	Section III: Fee Limits and Maximizing Fees
	Section IV: Other Questions
	First Things First – Log and Look
Fed and FDIC Propose to Pull Interest on Deposits Regs	No Notice of Right to Garnish Federal Benefits
SHELTER FROM THE STORM – Garnishments, Part Two	Oh, No! There are Direct Deposits of Federal Benefits!
	Answering the Garnishment Summons When There are Protected Amounts:
	Fees for Garnishments and Levies/Right of Offset

Title	Subtitle
	Bullet Point Summary of 31 CFR Part 212, Garnishment of Accounts Containing Federal Benefits Effective May 1, 2011
Good News and Bad News about a New LAR is in Your Future	
New FDIC CRC Address	
Good 1099 News	
Appraisals: What's Changed	
New Federal Reg to Protect Direct Deposit Benefits Recipients	
Fed Publishes Final HPML Escrow Rules	
Fed Announces Another Reg Z Proposal	
Proposed Reg CC Overhaul Would Mean Shorter Holds, Less Paper	
Credit Card Rules "Clarification" Published	
The Times They are a-Changin': How to Deal with Garnishments in Oklahoma after May 1, 2011	
Privacy Notices	
Compensating Loan Officers	
Anti-Steering Rules	
New Appraisal Rules	
Coping with the FDIC's Overdraft Guidance	
SCRA	
SAFE Act Registry Opens	
SCRA Becomes a Front Burner Issue	
New Payment Schedule Disclosures	
Poof! Proposed Rules Are Gone!	

Title	Subtitle
Compliance Roundtable Meeting	
Signs, Signs, Update Your Signs	
The Latest in Deposit Insurance	
Standard Maximum Insurance Amount	
TAG—Oct. 14, 2008–Dec. 31, 2010—R.I.P.	
Temporary Unlimited Insurance — Dodd-Frank Act § 343	
The Last Word (For Now)	
Revisiting Regulation V: Risk-based Pricing	
Bankruptcy Practice Pointer: The Co-Debtor Stay	
Question of the Month (and then some): Revocable Trusts	
Lending Reg BOOT CAMP: HMDA	
Federal S.A.F.E. Act Registry Will (Probably) Be Up By January 31, 2011	
Banks May Not Accept Tax Deposit Coupons after December 31, 2010	
FDIC Insurance Coverage Changes Effective January 1, 2011	Scope of the Interim Final Rule
Regulators Increase HMDA, CRA Thresholds Effective January 1, 2011	Prohibitions Against Coercion and Mischaracterization of Value (12 C.F.R. § 226.42(c))
New Reg Z Interim Final Rule Regarding Appraisal Independence Places Major New Burdens on Banks	Prohibition Against Conflicts of Interest (12 C.F.R. § 226.42(d))
	Prohibitions Against Certain Extensions of Credit (12 C.F.R. § 226.42(e))
	Customary and Reasonable Rate of Compensation for “Fee Appraiser”(12 C.F.R. § 226.42(f))
	Mandatory Reporting of Appraiser Misconduct(12 C.F.R. § 226.42(g))

Title	Subtitle
	September Interim Rule's New Disclosure Requirements for Consumer Transactions Secured by Real Property or a Dwelling
	September Interim Rule's Requirement of "No-Guarantee-to-Refinance" Statement
MDIA Interim Rule effective January 30, 2011 Changed Again	Additional Requirements/Clarifications of December Interim Rule
	12/31/2010 – FDIC TAG Program Expires (for banks that did not opt out in April 2010) (See October 2010 Legal Update)
	1/1/2011 – Deadline to Comply with New Final Rule for Notice of Transfer of Mortgage (See September 2010 Legal Update)
Compliance Dates Roundup	1/1/2011 – Deadline to Comply with Final Rule on Risk-Based Pricing (See October 2010 Legal Update)
	1/1/2011 – Model Privacy Notices Safe-Harbor Under Reg P Changes to New Model Form (See November 2010 Legal Update)
	1/3/2011 – Deadline to Display Updated FDIC Insurance Signage (See October 2010 Legal Update)
	1/30/2011 – Deadline to Comply with New Reg Z Disclosures (§ 226.18(s) and (t)) (See September 2010 Legal Update)
	What Happened in <i>Wachovia</i> ?
OBA's Legal Department Introduces New Frequently Asked Questions Feature!	WAIVER OF RIGHTS BY THE BANK

Title	Subtitle
Recent Case Sanctions Fraud Loss Shifting Provision in Commercial Deposit Account Agreements	<i>Wachovia</i> Court's Discussion of Applicable UCC Provisions
	§ 4-103. Variation by Agreement – Measure of Damages – Certain Action Constituting Ordinary Care
	But this is merely a default rule
	The Customer's Arguments against Enforcement of the Account Agreement:
	What Steps Should Your Bank Take to Protect Itself from Fraud Losses?
	The Fraud Loss-Shifting Provisions
	"Severability" or "Savings" Clause
	Anti-Waiver Provision
	Correction
	12/31/2010 – FDIC TAG Program Expires (for banks that did not opt out in April 2010) (See October 2010 Legal Update)
	1/1/2011 – Deadline to Comply with New Final Rule for Notice of Transfer of Mortgage (See September 2010 Legal Update)
Compliance Dates Roundup	1/1/2011 – Deadline to Comply with Final Rule on Risk-Based Pricing (See October 2010 Legal Update)
	1/1/2011 – Model Privacy Notices Safe-Harbor Under Reg P Changes to New Model Form (See November 2010 Legal Update)
	1/3/2011 – Deadline to Display Updated FDIC Insurance Signage (See October 2010 Legal Update)
	1/30/2011 – Deadline to Comply with New Reg Z Disclosures (§ 226.18 (s) and (t)) (See September 2010 Legal Update)

Title	Subtitle
	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)
	3/1/2011 – HMDA Annual Filings Are Due (applies to HMDA-banks only)
	3/1/2011 – CRA Annual Filings Are Due
	4/1/2011 – Deadline to Comply with New Final Rule Prohibiting Certain Loan Originator Compensation and Steering Practices. (See November 2010 Legal Update)
	Consideration of Low-Cost Education Loans to Low-Income Borrowers
	Activities Undertaken in Cooperation with Minority- and Women-Owned Financial Institutions and Low-Income Credit Unions
New CRA Regulation Effective 11/3/2010	
	Safe Harbor For Sample Clauses Will Disappear after 12/31/2010
	New Model Privacy Notice
Model Privacy Notices Safe-Harbor Under Reg P Will Change Effective 1/1/2011	What Should My Bank Do?
	Important Definitions
	Prohibition on Payments by Persons Other than the Consumer (12 C.F.R. § 226.36(d)(2))
New Final Rule Amends Reg Z, Prohibiting Certain Loan Originator Compensation and Steering Practices. Compliance Mandatory 4/1/2011	Prohibition on Payments Based On Transaction Terms or Conditions (12 C.F.R. § 226.36(d)(1))

Title	Subtitle
	Payments based on transaction terms or conditions
	Prohibition on Steering (12 C.F.R. § 226.36(e))
	What Should My Bank Do?
	Conditions That Must Be Met
Federal Reserve Board Rule Reflects Delay in Gift Card Disclosure Requirements to 1/31/2011	
Federal Reserve Board Announces Annual Indexing of Reserve Requirement Exemption Amount and Low Reserve Tranche for 2011	10/1/2010 – Deadline to Escrow for HPML Loans on Manufactured Housing (See September 2009 Legal Update)
FDIC Issues New Guidance on Golden Parachute Applications	10/1/2010 – Deadline to Adopt Policies and Procedures Required for Compliance with the S.A.F.E. Act (See August 2010 Legal Update)
Compliance Dates Roundup	11/1/2010 – Fees Banks May Charge for Compliance with Oklahoma Subpoenas Increase (See August 2010 Legal Update)
	12/31/2010 – FDIC TAG Program Expires (for banks that did not opt out in April 2010) (See October 2010 Legal Update)
	1/1/2011 – Deadline to Comply with New Final Rule for Notice of Transfer of Mortgage (See September 2010 Legal Update)
	1/1/2011 – Deadline to Comply with Final Rule on Risk-Based Pricing (See October 2010 Legal Update)
	1/1/2011 – Model Privacy Notices Safe-Harbor Under Reg P Changes to New Model Form (See November 2010 Legal Update)
	1/3/2011 – Deadline to Display Update FDIC Insurance Signage (See October 2010 Legal Update)

Title	Subtitle
	1/30/2011 – Deadline to Comply with New Reg Z Disclosures (§ 226.18 (s) and (t)) (See September 2010 Legal Update)
	4/1/2011 – Deadline to Comply with New Final Rule Prohibiting Certain Loan Originator Compensation and Steering Practices. (See November 2010 Legal Update)
	Permanent Increase to \$250,000
	Temporary Unlimited FDIC Guaranty for Noninterest-Bearing Transaction Accounts
Dodd-Frank Act Provides Changes to FDIC Insurance Coverage; TAG Program to Terminate 12/31/2010	Termination of the TAG Program Effective December 31, 2010
	Oklahoma Financial Privacy Act
	<i>Important Definitions:</i>
Primer on Financial Privacy Issues	<i>Subpoena Procedures</i>
	<i>Exceptions to Subpoena Procedures</i>
	<i>Requirement of Certification of Compliance</i> (6 Okla. Stat. § 2208)
	<i>What Should You Do When the Government Agency (or attorney) Hasn't Done Their Job?</i>
	Federal Right to Financial Privacy Act
	<i>Basic Requirements</i>
	<i>Exceptions to Notice and Certification Requirements</i>
	<i>Civil Liability</i>
	Important Definitions
	General Requirements for Risk-Based Pricing Notice (12 C.F.R. § 222.72)

Title	Subtitle
Compliance with Risk-Based Pricing Final Rule Mandatory January 1, 2011	<i>Credit Score Proxy Method</i> (12 C.F.R. § 222.72(b)(1))
	<i>Tiered Pricing Method</i> (12 C.F.R. § 222.72(b)(2))
	<i>Credit Card Method</i> (12 C.F.R. § 222.72(c))
	Exceptions to Risk-Based Pricing Notice Requirements (12 C.F.R. § 222.74)
	Timing of Notices
	Content of Notices
	10/1/2010 – Deadline to Escrow for HPML Loans on Manufactured Housing (See September 2009 Legal Update)
National Flood Insurance Program Extended through September 30, 2011	10/1/2010 – Deadline to Adopt Policies and Procedures Required for Compliance with the S.A.F.E. Act (See August 2010 Legal Update)
Compliance Dates Roundup	11/1/2010 – Fees Banks May Charge for Compliance with Oklahoma Subpoenas Increase (See August 2010 Legal Update)
	12/31/2010 – FDIC TAG Program Expires (for banks that did not opt out in April 2010) (See October 2010 Legal Update)
	1/1/2011 – Deadline to Comply with New Final Rule for Notice of Transfer of Mortgage (See September 2010 Legal Update)
	1/1/2011 – Deadline to Comply with Final Rule on Risk-Based Pricing (See October 2010 Legal Update)
	1/3/2011 – Deadline to Display Update FDIC Insurance Signage (See October 2010 Legal Update)

Title	Subtitle
	1/30/2011 – Deadline to Comply with New Reg Z Disclosures (§ 226.18 (s) and (t)) (See September 2010 Legal Update)
	Key Principles Underlying the Final Guidance
	What Employees Are Covered?
Final Guidance on Sound Incentive Compensation Policies	Principles of a Sound Incentive Compensation System
	Enforcement
	Conclusion
	Background to MDIA and the Interim Rule
	New Disclosure Requirements for Consumer Transactions Secured by Real Property or a Dwelling
Interim Rule Requires New Disclosures for Consumer Mortgage Loans; Compliance Deadline January 30, 2011	“No-Guarantee-to-Refinance” Statement
	Application of the Final Rule
	Mortgage Transfer Disclosures (12 C.F.R. § 226.39)
New TILA Requirement of Notice When Mortgage Has Been Sold or Transferred; Compliance Mandatory January 1, 2011	Disclosure Required
	Exceptions to the Disclosure Requirements
	Content of the Disclosures
	Background and History of the ADA
Department of Justice Final Rule on ADA Standards for Accessible Design and New Proposed Rules Will Affect Banks	6/25/2010 – Final Guidance on Incentive Compensation Policies Published (See discussion above)

Title	Subtitle
	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)
Compliance Dates Roundup	7/1/2010 – Deadline to comply with new Reg Z Changes to Open-End Credit (See March 2010 Legal Update)
	7/1/2010 – Deadline to comply with new regulations under Fair and Accurate Credit Transactions Act (“FACT Act”) (See March 2010 Legal Update)
	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)
	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)
	10/1/2010 – Deadline to Escrow for HPML Loans on Manufactured Housing (See September 2009 Legal Update)
	10/1/2010 – Deadline to Adopt Policies and Procedures Required for Compliance with the S.A.F.E. Act (See August 2010 Legal Update)
	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)

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

Title	Subtitle
Oklahoma H.B. 2936 Increases Fees for Compliance with State-Court Subpoenas Effective 11/1/2010	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)
HOEPA Dollar Trigger Increased Effective 1/1/2011	6/30/2010 – TAG Program Expiration for Banks that Opted Out (See May 2010 Legal Update)
Compliance Dates Roundup	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)
	7/1/2010 – Deadline to comply with new Reg Z Changes to Open-End Credit (See March 2010 Legal Update)
	7/1/2010 – Deadline to comply with new regulations under Fair and Accurate Credit Transactions Act (“FACT Act”) (See March 2010 Legal Update)
	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)
	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)
	10/1/2010 – Deadline to Escrow for HPML Loans on Manufactured Housing (See September 2009 Legal Update)
	10/1/2010 – Deadline to Adopt Policies and Procedures Required for Compliance with the S.A.F.E. Act (See discussion above)

Title	Subtitle
	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)
	Eligible ACH Transactions
	Transmission and Posting Deadlines
New Same-Day FedACH Service Available August 2, 2010	
	The Basics
	The Bankruptcy Trustee's Ability to Avoid a Preference
Avoiding Potential Pitfalls With Motor Vehicle Liens	What About the Bankruptcy Stay?
	Completing the Lien Entry Form
	Maintaining Priority in Secondary Advances
	Perfecting a Security Interest in Indian Titles
	Liability for Failure to Timely Release Lien
	Practical Tips
	Procedures for Identifying Correspondent Concentrations
Oklahoma Department of Consumer Credit Updates Statutory Dollar Amounts Effective July 1, 2010	Monitoring Correspondent Relationships
Regulators Issue Final Guidance on Correspondent Concentration Risks	Development of Plans for Managing Concentration Risks
	Good Practices for Correspondent Agreements

Title	Subtitle
	6/1/2010 – Compliance Deadline for new Reg GG (Unlawful Internet Gambling Enforcement Act (“UIGEA”) mandatory (delayed from December 1, 2009) (See November 2009 and December 2009 Legal Updates)
	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)
Compliance Dates Roundup	6/30/2010 – TAG Program Expiration for Banks that Opted Out (See May 2010 Legal Update)
	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)
	7/1/2010 – Deadline to comply with new Reg Z Changes to Open-End Credit (See March 2010 Legal Update)
	7/1/2010 – Deadline to comply with new regulations under Fair and Accurate Credit Transactions Act (“FACT Act”) (See March 2010 Legal Update)
	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) 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.

Title	Subtitle
	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)
	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)
	10/1/2010 – Deadline to Escrow for HPML Loans on Manufactured Housing (See September 2009 Legal Update)
	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)
	Deletion of Section 205.17(b)(4)
	Other Changes
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)	
	Who Are Qualified Employees?
	Payroll Tax Exemption
HIRE Act Provides Tax Incentives to Employers to Hire in 2010	Credit for Retention of Qualified Employees Hired in 2010
	Applicability to Banks

Title	Subtitle
FDIC Issues Guidance for Periods of Lapse of Flood Insurance Authority	Notice Requirements
Executive Order 13496 Requires Posting of Notice of Employees Right to Organize by June 21, 2010 – Affects Some Banks	Penalties and Sanctions for Noncompliance
	Typical Contracts Executed By Mark Must Be Witnessed or Notarized
	Signature on Checks
Using a “Mark” as a Signature, What Is Required and What Risks Are There to the Bank?	Use of POAs and Authorized Signers
	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)
	6/1/2010 – Compliance Deadline for new Reg GG (Unlawful Internet Gambling Enforcement Act (“UIGEA”) mandatory (delayed from December 1, 2009) (See November 2009 and December 2009 Legal Updates)
Compliance Dates Roundup	6/22/2010 – Deadline to Post Notice of Employees Right to Organize Under NLRA (for banks that have “government contracts”) (See This Issue)
	6/30/2010 – TAG Program Expiration for Banks that Opted Out (See May 2010 Legal Update)
	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)

Title	Subtitle
	7/1/2010 – Deadline to comply with new Reg Z Changes to Open-End Credit (See March 2010 Legal Update)
	7/1/2010 – Deadline to comply with new regulations under Fair and Accurate Credit Transactions Act (“FACT Act”) (See March 2010 Legal Update)
	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) 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.
	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)
	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)
	10/1/2010 – Deadline to Escrow for HPML Loans on Manufactured Housing (See September 2009 Legal Update)
	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)

Title	Subtitle
	Program Extended for 6 Month with another 12 Months Extension Possible without further rulemaking
	Assessment rates unchanged, but reporting changed to average daily balance.
TAG Program Extended Through December 31, 2010	Maximum rate of interest payable reduced from 0.50 percent to 0.25 percent
	New lobby notice requirements
	Basics of the FLSA
	Issuance of 29 C.F.R. § 541.203(b)
Mortgage Loan Officers Not Exempt Under FLSA According to New DOL Interpretation	FLSA2006-31
	Caselaw Following FLSA2006-31
	DOL Administrator's Interpretation No. 2010-1
	Why Administrator's Interpretation No. 2010-1 Is Important
	What Should Banks Do Now?
	What Is the Right of Setoff?
	Federal Protection Provided to Social Security and Other Federal Benefits
Banks' Right of Setoff vs. Federal Exemption for Social Security and Other Exempt Federal Benefits – Which Wins?	Tom v. First American Credit Union – Still the Last Word from the Tenth Circuit
	Washington v. Keffeler
	What Should Banks Do Now?
	4/1/2010 – Escrow Required for HPML Applications Received after April 1

Title	Subtitle
S.A.F.E. Act Update	5/20/2010 – Deadline for banks participating in TAG Program to update in-bank notices relating to TAG Program extension
Compliance Dates Roundup	6/1/2010 – Compliance Deadline for new Reg GG (Unlawful Internet Gambling Enforcement Act (“UIGEA”) mandatory
	7/1/2010 – Deadline to comply with new Reg E Opt-in Requirement for Overdraft Protection for ATM and One-Time Debit Card Transactions
	7/1/2010 – Deadline to comply with new Reg Z Changes to Open-End Credit
	7/1/2010 – Deadline to comply with new regulations under Fair and Accurate Credit Transactions Act (“FACT Act”)
	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) 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.
‘ABC’s of Handling Repossessed Property	
2010 Provides Unique Opportunity to Defer Tax on Roth IRA Conversions	
Floor Plan Lending Presents Special Challenges (maybe from your regulator)	4/1/2010 – Escrow Required for HPML Applications Received after April 1
When a Horse Is “Equipment” – It could only be the UCC	6/1/2010 – Compliance Deadline for new Reg GG

Title	Subtitle
Compliance Dates Roundup	7/1/2010 – Deadline to comply with new Reg E Opt-in Requirement for Overdraft Protection for ATM and One-Time Debit Card Transactions
	7/1/2010 – Deadline to comply with new Reg Z Changes to Open-End Credit
	7/1/2010 – Deadline to comply with new regulations under Fair and Accurate Credit Transactions Act (“FACT Act”)
	Federal Prohibition on Participation in Lotteries by Banks
	Oklahoma Law Prohibits Lotteries
Raffles and Giveaways and Lotteries, Oh My! What Can/Can’t a Bank Do?	Answering Some Common Questions
	Practical Tips
	Definitions
	Establishment of Policies and Procedures Concerning the Accuracy and Integrity of Furnished Information (12 C.F.R. § 222.42)
FACT Act Changes Mandatory July 1, 2010 (Reg V)	Investigation and Resolution of Direct Disputes (12 C.F.R. § 222.43)
	Exceptions to Investigation Requirements
Yet More Changes Affecting Open-End Credit to Consumers (Reg Z) Effective February 22, 2010 and July 1, 2010	2/14/2010 – Deadline to Comply with Revisions to Reg Z for Higher Education Opportunity Act
Reminder: Escrow Required for HPMLs for All Applications Received after April 1, 2010	2/22/2010 – Deadline to Comply with Provisions of Credit Card Act

Title	Subtitle
Compliance Dates Roundup	3/1/2010 – HMDA and CRA Annual Filings Due
	4/1/2010 – Escrow Required for HPML Applications Received after April 1
	6/1/2010 – Compliance Deadline for new Reg GG
	7/1/2010 – Deadline to comply with new Reg E Opt-in Requirement for Overdraft Protection for ATM and One-Time Debit Card Transactions
	7/1/2010 – Deadline to comply with new Reg Z Changes to Open-End Credit
	7/1/2010 – Deadline to comply with new regulations under Fair and Accurate Credit Transactions Act (“FACT Act”)
	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)
	Summary of FAS 166
	Summary of FAS 167
Regulators Adopt Final Rule Implementing New FASB Standards 166 and 167	Why FAS 166 and 167 Are Important to Banks
	Final Rule
	Perfection and Priority in Certificated CDs: Possession Required
	Perfection and Priority in Book-Entry CDs: “Control” Required
Perfection and Priority in Certificates of Deposit	
	Oklahoma’s Statutory Framework
	Uniform Trade Secrets Act

Title	Subtitle
Despite Tough Legal Framework, Banks Can Take Steps to Protect Themselves from Losing Business to a Departing Employee	Practical Suggestions for Banks:
	2/14/2010 – Deadline to Comply with Revisions to Reg Z for Higher Education Opportunity Act
	2/22/2010 – Deadline to Comply with Provisions of Credit Card Act
Upcoming Compliance Dates (New Feature!)	3/1/2010 – HMDA and CRA Annual Filings Due
	4/1/2010 – Escrow Required for HPML Applications Received after April 1 (except manufactured housing)
	6/1/2010 – Compliance Deadline for new Reg GG (Unlawful Internet Gambling Enforcement Act (“UIGEA”) mandatory
	7/1/2010 – Deadline to comply with new Reg E Opt-in Requirement for Overdraft Protection for ATM and One-Time Debit Card Transactions
	7/1/2010 – Deadline to comply with new Reg Z Changes to Open-End Credit
	7/1/2010 – Deadline to comply with new regulations under Fair and Accurate Credit Transactions Act (“FACT Act”)
	Common Scams
Reg CC Update: All Checks Are Local Effective 2/26/2010	Legal Framework Surrounding Cashier’s Checks
Taking Cashier’s Checks for Deposit in Today’s Environment of Fraud	Recommendations for Minimizing Risk to Your Bank
	What Loans Are Affected?

Title	Subtitle
	Disclosure Requirements
Revisions to Reg Z for Higher Education Opportunity Act Have Compliance Deadline of 2/14/2010	Prohibition of Co-Branding (12 C.F.R. § 226.48(a) and (b))
	Consumer's Right to Accept (12 C.F.R. § 226.48(c))
	Consumer's Right to Cancel (12 C.F.R. § 226.48(d))
	Self-Certification Form (12 C.F.R. § 226.48(e))
	Limitations on Fees and Interest Rates
	Safeguards for Young Borrowers
Provisions of Credit Card Act Effective 2/22/2010	Gift Card Restrictions
	Increased Government Oversight and Additional Requirements
HOEPA Fee Trigger Lowered For 2010	
Clarification from Federal Reserve Supports Viability of Short-Term Balloon Notes in Spite of HPML Changes	
Reg GG Implementation Deadline Extended at Last Minute to June 1, 2010	Relationship between Reg E and Reg Z [12 C.F.R. § 205.12]
Recent Reg CC Changes: We Are Quickly Heading Toward All Local Checks	Important Definitions
Final Rule Revising Reg E Restricts Overdraft Charges on ATMs and One-Time Debit Card Transactions Effective July 1, 2010	Opt-In Requirement [12 C.F.R. § 205.17(b)]
	Exceptions to Opt-In Requirement 12 C.F.R. § (b)(4)
	Prohibition on Bundling ATM/One-Time Debit Card Overdraft Protection [12 C.F.R. § 205.17(b)(2) and (3)]

Title	Subtitle
	Timing of Implementation [12 C.F.R. § 205.17(c)]
	Requirements of Notice to Customers [12 C.F.R. § 205.17(d)]
	Customer's Right to Opt Back Out
	Rationale for the Final Rule
	Technical Issues for Implementing Final Rule
	Practical Advice in Wake of the Final Rule
	Discrete Filers
	Batch Filers
FinCEN's BSA E-Filing Completes Transition to Adobe-based Electronic Forms Effective 1/1/2010	Secure Direct Transfer Mode (SDTM) Filers
Reminder: Changes to Reg DD Effective 1/1/2010	
Reminder: HUD's Reg X (RESPA) Changes; Use of New GFE and HUD-1 Forms Mandatory 1/1/2010	Where Are We Now?
Reg S Revised to Increase Fees for Subpoena Compliance Effective 1/1/2010	
S.A.F.E. Act Update	Adoption and Implementation of Written Policies
	Notice to Existing Commercial Customers
Compliance with New Reg GG Is Mandatory on December 1, 2009	Due Diligence Procedures: Account Opening
	Not a License to Distribute Funds
	Safe Deposit Boxes

Title	Subtitle
Oklahoma's Estate Tax Repealed Effective January 1, 2010	Happiness Short Lived?
3% Interest Requirement for County Deposits Gone Effective July 1, 2009	Discussion of UCC Provisions
Change to Unclaimed Property Statute Effective November 1, 2009	History of the Caselaw
OK to Charge Fee to Cash On-Us Check for Non-Customers?	Oklahoma Caselaw
	Reg DD
	<i>ARM Loans</i>
FDIC's Final Rule Extends TAG Program 6 Months to June 30, 2010; Participating Entities Can Opt Out of Extension by November 2	<i>7-Year Balloons</i>
Working Around the October 1 Reg Z Changes	<i>3.5- or 4-Year Renewable Balloon Notes</i>
	<i>Need for Clarification of Presumption of Compliance Rules</i>
	<i>Use of New Mortgage Servicing Transfer Disclosure Form</i>
	<i>Changes to Four Key Definitions</i>
Changes to HUD's Reg X (RESPA) Go In Effect January 1, 2010	<i>Allowance of Use of Average Charges</i>
	<i>State Adoption of Central Filing System and the Exceptions Thereunder</i>

Title	Subtitle
	<i>Exception Where Buyer Receives Written Notice from Secured Party</i>
Special Risks Surround Using Farm Products as Collateral	
	HOEPA Loans
	<i>Higher-Priced Mortgage Loans</i>
Creation of HPMLs and Requirements for Verification of Repayment Ability for HPMLs and HOEPA Loans	Requirements for Verification of Repayment Ability for HPMLs and HOEPA Loans
	Presumption of Compliance or Requirement?
	Examples (from 12 C.F.R. Pt. 226, Supp. 1):
	Exclusions from Presumption of Compliance
	Treatment of ARM Loans
	Application of New Rules to Loan Renewals and Assumptions
	Restrictions Applicable to HPMLs (12 C.F.R. § 226.35(b)(2))
New Escrow Requirement for HPMLs Effective for Applications Received on or after April 1, 2010 (October 1, 2010 for Manufactured Homes)	Restrictions Applicable to HOEPA Loans (12 C.F.R. § 226.32(d)(6) and (7))
Restrictions on Prepayment Penalties for HPMLs and HOEPA Loans Effective 10/1/2009	
	Examples of Prohibited Conduct:
Revisions to HMDA (Reg C) Incorporate Reg Z's Addition of HPMLs Effective 10/1/2009	Examples of Conduct that Do Not Violate This Section:
New Appraisal-Related Amendments Effective 10/1/2009	<i>New Mortgage Servicing Practices Effective 10/1/2009</i>

Title	Subtitle
	New Clear and Conspicuous Standard for Closed-End Credit Advertisements
	Disclosures Required If “Triggering Terms” Are Used
New Mortgage Servicing Practices Effective 10/1/2009	Alternative Disclosures for Television or Radio Advertisement (12 C.F.R. § 226.24(g))
New Advertising Restrictions Affecting Closed-End Credit Loans Effective 10/1/2009	Additional Restrictions Applicable to Advertisement for Credit Secured by a Dwelling
	Acts Specifically Prohibited for Advertisements for Credit Secured By a Dwelling (12 C.F.R. § 226.24(i))
S.A.F.E. Act Redux	
<i>Byron’s Quick Hit for October 1 Reg Z and Reg C Changes</i>	<i>Federal law controls priority of a federal tax lien.</i>
Greetings from the OBA’s New General Counsel	<i>Property that Federal Tax Lien Will Not Take Priority, Even with Filing:</i>
After the Loan: Don’t Lose Your Priority to a Federal Tax Lien	<i>The 45 Day Rule of I.R.C. § 6323(c)</i>
	<i>Loan advances</i>
	<i>What should you do?</i>
	<i>Loans Secured by After-Acquired Collateral</i>
	<i>Subsequent loan advances</i>
	<i>Where to Check for Federal Tax Lien Filing</i>
	<i>Liens on Real Property</i>
	<i>25 day Notice to the IRS Required Prior to Foreclosing on Property Subject to Tax Lien under I.R.C. § 7425</i>
	<i>Conclusion</i>

Title	Subtitle
	<i>Advanced Notice of Increase in APR or Other Significant Changes</i>
	<i>Right to Cancel upon Notification of Rate Increase/Other Significant Changes</i>
Credit Card Act of 2009: Certain Provisions Effective August 20, 2009, Plus Overview of Remaining Provision	<i>Timing of Periodic Statements in Relation to Late Fees</i>
	<i>Summary of Other Important Provisions of the Credit Card Act of 2009:</i>
	<i>Limitations on Fees and Interest Rates</i>
	<i>Safeguards for Young Borrowers</i>
	<i>Gift Card Restrictions</i>
	<i>Increased Government Oversight and Additional Requirements</i>
	<i>Provisions of the HVCC</i>
	<i>Rules for Appraiser Engagement</i>
Home Valuation Code of Conduct: Affects Sale of Residential Mortgage Loans to Fannie Mae and Freddie Mac Beginning May 1, 2009	<i>Prohibitions Against Influencing Appraisers</i>
	<i>Other Provisions of HVCC</i>
	<i>Notice Required Upon the Sale or Transfer of a Residential Home Mortgage</i>
	<i>Protecting Tenants at Foreclosure Act</i>
New Notice Required Upon Sale/Transfer of Residential Home Mortgages & Protecting Tenants at Foreclosure Act, Both Effective May 20, 2009	

Title	Subtitle
	<i>What loans are covered?</i>
Reg D – Savings Deposit Transfers Rule Changes July 2, 2009	<i>Definitions of “business day.”</i>
Reg Z – MDIA Changes – Effective July 30, 2009	<i>Let’s get this party started</i>
	<i>We have received an application, so now what happens?</i>
	<i>Notice requirement</i>
	<i>Charging the consumer fees</i>
	<i>When is redisclosure required?</i>
	<i>Waiver of Waiting Period Before Consummation</i>
	<i>Calculating when consummation may occur</i>
The Secure and Fair Enforcement for Mortgage Licensing Act (S.A.F.E. Act)	No Article published for this month
The Oklahoma Department of Consumer Credit’s Truth in Lending Permanent Rule	
Consumer Loan Dollar Amounts – No Changes	
No Article published for this month	
Charging Consumer Interest Using a 360-Day Year?	
Adding a Floor to Variable-Rate Mortgage Loans?	<i>U3C Restrictions</i>
Waiving a Rate That is Too High	<i>U3C & Regulation Z Exceptions</i>
Default Interest Not Allowed on Consumer Loans?	<i>No Exclusions for High-Rate/High-Fee Mortgages</i>
	<i>Further Considerations.</i>
	1. Disclosing Total Fees Charged
	2. Required “Tabular” Format

Title	Subtitle
New Rules for Disclosure of Overdraft Fees	3. What Fees are Included
	4. Disclosure of Account Balances
	5. Making Other Choices?
	6. Other Pending Proposals
	<i>Why RDC is Different</i>
Helping a Customer to Avoid or Decrease Overdraft Charges	<i>Operational Risks</i>
Risk Management of Remote Deposit Capture	<i>Risk-based Decision-making.</i>
	<i>Qualifying a Customer Financially?</i>
	<i>Legal and Compliance Risks</i>
	<i>RDC Depositor Agreements</i>
	<i>Appropriate Controls</i>
	<i>Types of Sweep Account</i>
	<i>Some Excluded Sweep Accounts</i>
New FDIC Disclosure for Banks Offering Sweep Accounts	<i>Why Sweep Accounts?</i>
	<i>FDIC Cutoff Point</i>
	<i>Will A Better Scenario Occur?</i>
	<i>No More "External" Transactions</i>
	<i>External Sweep Accounts</i>
	<i>Internal Sweep Accounts</i>
	<i>Contents & Timing of Notice</i>
	<i>HOEPA "High-Fee" Mortgages</i>
	<i>HMDA-Reporting Banks</i>
Various Cost-of-Living Increases in Dollar Amounts for 2009	<i>Community Reinvestment Act</i>
	<i>Health Savings Accounts</i>

Title	Subtitle
	<i>IRAs</i>
	<i>Lending to Creditworthy Borrowers</i>
No IRA Minimum Distributions Required for 2009	<i>Shouldn't a Bank Control Its Lending?</i>
Interagency Statement on Meeting Needs of Creditworthy Borrowers	<i>Strengthening Capital</i>
	<i>Dividends for Debt Service & Taxes</i>
	<i>Working with Mortgage Borrowers</i>
	<i>Structuring Compensation</i>
	<i>All Banks Must Adhere</i>
Creditor Must Be Notified if Personal Representative Rejects a Claim in Probate	
Unclaimed Property—Collecting Fees Owed on Safe Deposit Boxes	<i>Background</i>
Oklahoma Adopts Uniform Real Property Electronic Recording Act	<i>The Act's Coverage</i>
Notification Required for Security Breach Of Computerized Data	<i>Exclusions for Financial Institutions and Others</i>
	<i>Breach of Security</i>
	<i>"Personal Information"</i>
	<i>Method of Enforcement</i>
	<i>"Encrypted/Redacted"</i>
	<i>"Notice"</i>
	<i>Notifying the FDIC</i>

Title	Subtitle
Capital Purchase Plan Deadline Extended for Non-publicly-traded Banks	<i>Summary of the Program</i>
"Opt Out" Date Extended for FDIC's Temporary Liquidity Program	<i>"Transaction Account Guarantee Program"</i>
	<i>Calculating Available Coverage</i>
	<i>Includes "Official Checks"</i>
	<i>Whose Deposits are Covered?</i>
	<i>Lobby Signs Required</i>
	<i>"Debt Guarantee Program"</i>
	<i>More Questions</i>
	<i>Charitable Gift of the RMD</i>
	<i>Maximizing the Distribution</i>
Tax Free Charitable Distributions from IRAs	<i>Smaller Charitable Distributions</i>
	<i>Larger Charitable Distributions</i>
	<i>Reason for the Changes</i>
	<i>"Qualifying Beneficiaries"</i>
Recent Changes to FDIC Insurance for Trusts, POD Accounts	<i>Trust Deposits up to \$500,000</i>
	<i>Deposits over \$500,000</i>
	<i>Trust Becomes Irrevocable</i>
	<i>Training the Tellers</i>
	<i>Training Loan Officers</i>
Importance of Training to Deal with FDIC Insurance Questions	<i>Confidential Discussion of Finances</i>
	<i>Good and Bad Responses</i>
	<i>Failing "Banks"</i>
	<i>FDIC Insurance Limits</i>
	<i>Getting the Message Out</i>

Title	Subtitle
	<i>Deposits for Liquidity</i>
	Foreclosure of Mortgages
	Longer Interest Reduction
Two Changes to Servicemembers' Civil Relief Act	
	Structuring a Home Purchase
	First-Time Homebuyer
Tax Credit for First-Time Homebuyers	June 30, 2009 Deadline
	Principal Residence
	Amount of Tax Credit
	"Refundable" Tax Credit
	Accelerated Recapture of Tax Credit
	"Tax Recapture" Examples
	Death; Condemnation of Property
	Divorce; Transfers between Spouses
	Requirement to File Tax Returns
	Grounds for Reduction
	Notice of Reduction
Can Banks Freeze Home-Equity Lines of Credit?	Periodic Re-evaluation
	Best Practices
	<i>1. Avoiding Probate</i>
Motor Vehicle Lien Entry Forms Are Changing	<i>2. Transferring "Titled" Property</i>
New Statute Allows "Transfer on Death" for Real Estate	<i>3. Various Beneficiary Statutes</i>
	<i>4. Joint Tenancy—Pros and Cons</i>
	<i>5. TOD Deed—Basic Provisions</i>
	<i>6. Time of Filing Deed</i>

Title	Subtitle
	<i>7. Execution of Deed</i>
	<i>8. Special Deed Form Required</i>
	<i>9. Joint Tenancy Plus TOD</i>
	<i>10. Revoking a Deed</i>
	<i>11. Title Passes at Death</i>
	<i>12. Encumbrances on Real Estate</i>
	<i>13. When Beneficiary Dies First</i>
	<i>14. Unsecured Creditors & Claims</i>
	<i>15. Unintended Consequences?</i>
	<i>1. Refund of Assessments</i>
	<i>2. Temporary College Branches</i>
Commissioner's Bill Revises Several Banking Provisions	<i>3. Branches at Temporary Events</i>
	<i>4. Eliminating Certain Fees</i>
	<i>1. Board Reporting/Loans</i>
	<i>2. Board Reporting/Loan Concentration</i>
Recent Changes to Oklahoma Banking Board's Regulations	<i>3. Required Info for Loan Participants</i>
	<i>4. Mandatory Vacation/Internal Control</i>
	<i>5. Dormant Accounts</i>
	<i>6. Registration of Non-bank ATMs</i>
	<i>1. Limitations of Old Retention Schedule</i>
	<i>2. Requirements of the Revised Reg</i>
Major Changes to Oklahoma's Record Retention Schedule	<i>3. Retention Issues</i>
	<i>4. Formal Retention Policy?</i>

Title	Subtitle
Elder Abuse Punishment Increases	
Consumer Loan Dollar Amounts Adjust on July 1	
Paying 3% Interest on County Deposits	
Accepting Checks with Missing Endorsements	
Accepting Checks for Collection	Qualifying Beneficiaries
A word of caution for Lenders operating under Section 3-508B:	One-Owner Revocable Trusts
New FDIC Guide to Deposit Insurance Of Trusts & POD Accounts	Revocable Trust Becomes Irrevocable
	Primary & Contingent Beneficiaries
	Changed Amount of Insurance?
	Certificate of Trust?
	Life Estate & Remainder Beneficiaries
	Joint Revocable Trusts
	POD Accounts
	Contingent POD Beneficiaries
	Joint Accounts with PODs
	Irrevocable Trusts
"Local Check" Area Expanding on April 19	1. Requiring Identification Numbers
Recent Court Ruling Concerning Liens on Indian Car Titles	2. W-9 to Open Accounts
Using W-9s (With SSN or ITIN) or W8-BENs to Open Accounts	3. W8-BEN for Opening Accounts
	4. Types of Social Security Cards
	6. Documentation for Issuing an SSN
	7. Appropriate CIP Documentation?
	8. Why Apply for an ITIN?

Title	Subtitle
	9. Valid Tax Reason for ITIN
	10. Documentation to Obtain an ITIN
	11. ITIN “Applied For”
	When is a Representative Payee Appointed?
	Correct Account Styling
Understanding Representative Payee Accounts	Guardian/Rep Payee
	Successor Trustee/Rep Payee
	POA/Rep Payee
	Only a Rep Payee
	Only an Authorized Signer
	Joint Accounts
	Organizational Rep Payees
	Rep Payees for Children
	1. Some Definitions
	2. Declaration of Loss
Replacing a Cashier’s Check Based on Declaration of Loss	3. Procedural Steps
	4. Indemnity Agreement
	1. Preclusion
	2. Agency
Basis for Charging “Unauthorized” Items to Customer’s Account	3. Estoppel
	4. Ratification
	1. Who Is Covered?
Other Ways a Forged Signature is Not a Forgery	2. Address Validation Requirements

Title	Subtitle
Duties of Card Issuers Regarding Address Discrepancies	3. “Notice” Method
	4. “Other” Method
	5. Timing for Compliance—Two Options
	1. Number of Allowed Transactions
	2. Eliminating Excess Transactions
Verifying Social Security Numbers	<i>15. Other Provisions</i>
Permitted Number of Transactions on Savings & MMDAs	
	Developing Responses to Red Flags
	Suspicious Activity Reports & Privacy Exceptions
Discussion of Identity Theft Red Flags	Example of SAR Filing
	Credit Report Alerts & Notices
	Suspicious Documents
	Suspicious Personal Identifying Information
	Unusual Use/Suspicious Activity on Account
	Notice of Identity Theft
	<i>1. Joint Regulation’s Numbering System</i>
	<i>2. Identity Theft Prevention Program</i>
Joint Regulation on Identity Theft Red Flags & Address Discrepancies	<i>3. Different Risk Profiles</i>
	<i>4. Definition of “Red Flags”</i>
	<i>5. Elements of a Program</i>
	<i>6. Administration of Program</i>
	<i>7. Interagency Guidelines</i>
	<i>8. Listing Appropriate Red Flags</i>
	<i>9. Detecting Red Flags</i>
	<i>10. Preventing/Mitigating Identity Theft</i>
	<i>11. Updating the Program</i>

Title	Subtitle
	<i>12. Administering the Program</i>
	<i>13. Other Legal Requirements</i>
	<i>14. Address Discrepancy on Consumer Report</i>
	<i>1. Background</i>
	<i>2. Regulated Categories of "Consumer Credit"</i>
D.O.D. Lending Regulation for Servicemembers	<i>3. Three Loan Categories That Apply</i>
	<i>4. Need to Identify Every Covered Borrower</i>
	<i>5. "Covered Borrower Identification Statement"</i>
	<i>6. Which Applicants Should Fill Out the Identification Statement?</i>
	<i>7. Special Provisions Applying to All Covered Loans</i>
	<i>8. "Military APR" (MAPR); Other Required Disclosures</i>
	<i>9. "MAPR" Limited to 36%</i>
	<i>10. No Renewal of Debt</i>
	<i>11. Other Prohibited Practices</i>
	<i>12. Criminal Provision</i>
	<i>13. What's a "Covered Borrower"?</i>
	<i>1. Transition to Active Duty.</i>
	<i>2. Written Waiver by Servicemember or Person Secondarily Liable.</i>
Servicemembers' Civil Relief Act—Impact on Lenders	<i>3. Interest-Rate Reduction.</i>
	<i>4. Foreclosure of Mortgage is Invalid.</i>
	<i>5. Reamortization of Mortgage Indebtedness.</i>
	<i>6. Protection of Servicemember against Default Judgments.</i>
	<i>7. Verifying Someone's Active Duty.</i>
	<i>8. Setting Aside a Default Judgment.</i>
	<i>9. Servicemember's Right to Stay Legal Proceedings.</i>

Title	Subtitle
	<i>10. No Fines or Penalties.</i>
	<i>11. Stay to Prevent Execution on a Judgment, Attachment or Garnishment.</i>
	<i>12. Protecting Persons Jointly or Secondarily Liable.</i>
	<i>13. Personal Assets Pledged on Business Debt.</i>
	<i>14. Installment Purchase Contracts (Dealer Paper).</i>
	<i>15. Reamortization of Payments Owed on a Contract.</i>
	<i>16. Appraisal Procedure for Repossession.</i>
	<i>17. No Reporting of Bad Credit.</i>
	<i>18. Termination of Motor Vehicle or Real Estate Lease.</i>
	<i>19. Protection from Eviction for up to Three Months.</i>
	<i>20. Enforcement of Lien on Servicemember's Real or Personal Property.</i>
	<i>21. Extension of Statutes of Limitation.</i>
	<i>1. ARMs vs. Fixed-Rate Mortgages</i>
	<i>2. "Low-Initial-Payment" Mortgages</i>
Background on Subprime Mortgages	<i>3. Mortgage Suitability</i>
	<i>4. Foreclosure Rates</i>
	<i>5. Refinancing: A Way Out?</i>
	Statement's Coverage
	What is "Subprime"?
Interagency Guidance on Subprime Mortgages	Substantial Risk Factors
	Balloon Payments?
	Consumer Protection Principles
	Underwriting Standards
	Control Systems

Title	Subtitle
Consumer Loan Dollar Amounts Adjust on July 1	
Changes to Identity Theft Provisions	
All ATV's Transferred After June 30, 2008 Require Titles & Liens	
How to Re-title a Mobile Home Merged Into the Real Estate	Financial Neglect; Exploitation
Commissioner's Bill Includes Several Miscellaneous Changes	Specific Duty to Report
Changes to Oklahoma's Vulnerable Adult Abuse Reporting Provisions	Avoiding Singling out Banks
	Expanded DHS Powers
	Citizenship/Immigrant Verification
	Independent Contractor Verification
Illegal Immigration: How H.B. 1804 Affects Banks, Other Businesses	"Harboring" Illegal Immigrants
	Restriction on Issuing ID's
	Other Provisions
	Economic Costs
	<i>1. Little Direct Impact on Banks</i>
	<i>2. Money-Transmitter Activity</i>
New Oklahoma Regulations Covering Money Transmitters	<i>3. Need for State Enforcement</i>
	<i>4. Equal Standards of Compliance</i>
	<i>5. License Requirements</i>
	<i>6. Financial Requirements</i>
	<i>7. Surety Bond Required</i>
	<i>8. Net Worth; Investments</i>
	<i>9. Agent Funds Held "in Trust"</i>

Title	Subtitle
	<i>10. BSA Requirements</i>
	<i>11. Additional Recordkeeping</i>
	<i>12. Enforcement Authority</i>
	<i>1. Authority for Check Returns</i>
	<i>2. Presentment Warranties</i>
Returning Checks for “Breach of Presentment Warranty”	
	What the Statute Says
	Bulk Filing
Stale-Dated Checks: Should the Bank Pay Them or Not?	Regulation CC Exception Hold
	Whether to Pay or Not?
	Some Possible Approaches
	When is an Old Check No Longer Good?
	The Bulk Filing Issue
	Having a Valid Reason for Return
Reasons for Returning Checks within the Midnight Deadline	Reasons Limited to the Midnight Deadline
	“Refer to Maker”; Kiting
	“Account Closed”
	Forged Checks
	Dummy or Counterfeit Checks
	<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>
	<i>2. Should the bank ask the customer what is his reason for stopping payment?</i>

Title	Subtitle
Stop Payment Orders on Checks – Questions and Answers	<i>3. What do you say when the check’s payee wants a reason?</i>
	<i>4. Does stopping payment automatically reverse the customer’s transaction with the payee?</i>
	<i>5. In what situations is a stop payment order helpful?</i>
	<i>6. Who can give the bank a stop payment order?</i>
	<i>7. What if the signers disagree with each other?</i>
	<i>8. When is a stop payment order provided quickly enough?</i>
	<i>9. What events define “Final Payment”?</i>
	<i>10. What’s a “Reasonable Time to Act” on a stop payment order?</i>
	<i>11. When does a stop payment order describe a check with “Reasonable Specificity”?</i>
	<i>12. Is an online stop payment order effective for six months?</i>
	<i>13. For how long is an oral stop payment order effective?</i>
	Examples: When a bank would like to avoid paying a cashier’s check
	Is a customer’s “defense” against the payee a reason for not paying a cashier’s check?
No Means of Stopping Payment on Cashier’s Checks	When does a bank have its own defense to paying a cashier’s check
	<i>A. What Loans are Covered</i>
	<i>B. CRE Concentrations</i>
Joint Guidance on Commercial Real Estate Concentrations	<i>C. Varying Risk in CRE Loans</i>
	<i>D. Why This New Guidance?</i>

Title	Subtitle
	<i>E. Cash-Flow-Dependent Loans</i>
	<i>F. Some Oklahoma Examples</i>
	<i>G. Ongoing Risk Assessments</i>
	<i>H. Risk-related Modifications</i>
	<i>I. Risk Management Processes</i>
	<i>J. Board/Management Oversight</i>
	<i>K. Portfolio Management</i>
	<i>L. Mgmt. Information Systems</i>
	<i>M. Market Analysis</i>
	<i>N. Credit Underwriting Standards</i>
	<i>O. Portfolio Stress Testing</i>
	<i>P. Supervisory Oversight</i>
	<i>Q. Capital Adequacy</i>
	HSA Contribution Amounts
	Reimbursing Medical Expenses
Recent Amendments to Health Savings Account Provisions	Accumulating Tax-Advantaged Savings
	Full Deduction in First Year
	Transfer from IRA to HAS
	Bank Name, Deceptive Use of..... July
	Check Conversion..... February
Index for 2006	Check Scams..... April
	CIP—Alternative Methods..... March
	Credit Report File Freezes..... August
	Deceptive Use of Bank Name..... July
	Deposit Insurance Reform..... April
	EFT Transactions..... February
	Exploitation of Elderly or Disabled..... July
	FACT Act..... January

Title	Subtitle
	Fair Credit..... January
	FDIC Insurance of IRA's..... April
	Holding Company Debt Levels..... March
	IRA's April, November
	Late Fee Increase..... May
	Loans to Service Members..... December
	Manufactured Homes/Fixture Filings..... May
	Mechanic's Lien Changes..... October
	Medical Information/Loan Approval..... January
	Money Services Businesses..... May
	Money Transmitters..... May
	Oil & Gas UCC-1 Filings..... May
	P. O. D. Beneficiaries..... June
	Payroll Cards..... September
	Predatory Lending..... December
	Privacy..... January
	Regulation E Changes..... February, March, September
	Safe Deposit Box "Access on Death" June
	Scams..... April
	Service Members & Dependents..... December
	Small Loan Dollar Adjustments..... May
	UCC-1 Searches..... May
	UCCC Annual Adjustments..... May
	Background
	What Transactions are Covered?
Defense Authorization Act – Restrictions on Loans to Service Members and Their Dependents	"Interest" Limited to 36%
	All Fees are "Interest"

Title	Subtitle
	New Definition of “APR”
	No Lender Access to Bank Account
	No Renewal of Debt
	No Mandatory Arbitration
	Non-complying Contracts Void
	Criminal Provision
	What Persons are Covered?
	IRA Contribution Limits.
	Tax Refunds & Other Transfers to IRA’s.
Pension Reform: Useful Changes to IRA Provisions	IRA’s of Guards & Reservists.
	IRA Distributions to Charities
	Understanding the Tax Advantages:
	50% limit on charitable contributions doesn’t apply.
	Deductions and credits don’t phase out.
	Reducing RMD’s in future years.
	Rollover to “Inherited IRA”
	Easier Conversion to Roth IRA’s
	Background
	Obsolete Provisions
Cleanup Changes in 2006 to Mechanic’s Lien Provisions	What Services Are Covered
	Certificate of Title Property with Liens
	Change in Time Period
	Rental-Related Changes to Section 91
	Revisions to Section 180
	"Other Property" Mechanic’s Liens
	Section 91A vs. Section 197
	Section 91A Notice Procedures

Title	Subtitle
	Assistance in Researching Titles
	Property Removed without Permission; Release Obtained by Bad Check
	Service Provider's Right to Repossess
	"Payroll Card Account"
	DHS Cards vs. Payroll Cards
Payroll Card Accounts & Regulation E Changes	Is a Payroll Card Useful?
	Advantages to Consumers
	Employer Considerations
	Advantages for Banks
	Payroll Cards Not Mandatory?
	No Periodic Statements
	Consumers Who Don't Want Statements
	Error Resolution
	Limits on Liability
	Modified Disclosures
	Reporting to Authorities
	Legislative Background
	Security Freeze Request
New Law Provides for Credit Report Freezes	Authorizing a Temporary Release
	Is a "Freeze" a Good Idea?
	Assistance with Temporary Releases
	Assistance with Security Freezes
	Lender Exceptions to Security Freeze
	Other Exceptions to Security Freeze
	Excluded Entities
	Notice of Changes
	Security Freeze Notice Required
	Fines & Penalties

Title	Subtitle
	Insurance Practices
	Disclosure of Non-Authorization
Deceptive Use of a Bank's Name in Soliciting Customers	Comparing the Statutes
	"Elderly" Defined
	"Disabled" Not Defined
Exploitation of Disabled or Elderly Adults	"Lacks Capacity to Consent"
	"Exploitation" Defined
	Criminal Penalties
	Knowledge of Incapacity
	Understanding the Customer's Needs
	First-Choice/Second-Choice POD Authority
Amendments to Deposit Account P.O.D. Provisions	Charity as POD Beneficiary
	Required Notice to Accountholders
	a. Increased Late Fees
New Provision for Safe Deposit Box "Access on Death"	b. "508B" and "508A" Loans
Consumer Loan Dollar Amounts Adjusting on July 1	c. Dealer Paper "No Deficiency" Amount
Money Transmitters Must Register With Banking Department	

Title	Subtitle
July 1 Deadline for Continuation Statements for Oil and Gas	“Self-Directed” Requirement
Searching UCC-1’s in Only One Filing Office as of July 1, 2006	Multiple Accounts
Duration of Fixture Filings Related to Manufactured Homes	Credit Unions
Increased Deposit Insurance Limits for Retirement Accounts	Funding Opportunities
	Statement Stuffers
	Future Increases in Deposit Insurance
	Feasibility Studies
	Merged Insurance Fund
	Modified Reserve Ratio
Other Details of Deposit Insurance Reform Legislation	Dividend of Excess Funds
	Credit against Assessments
	Fund Restoration Plans
Cross-Border Scams–Overpaying by Check, Wiring Back Money	Some Advantages
Procedures to Avoid Losses on Check Scams	Permitted Debt Ratios
Higher Debt Allowed for \$150-500 Million Holding Companies	Reason for the Change
	Additional Restrictions
	Disclosure at ATM’s
	Preauthorized Debits
More New Changes to Regulation E	Good Faith Errors

Title	Subtitle
	Stop Payments
	Extended Time for Raising Errors
	Extent of Error Investigation
	Electronic Check Conversion
Using Multiple CIP Approaches	Reg E Initial Disclosures
Electronic Check Conversion under Regulation E	Some Exceptions
	Check Conversion by Merchants
	Notice at POS Locations
	Notice for Billing Statements
	Coupon Books
	Authorization at POS
	Authorization on Billing Statements
	Comparison to ACH Rules
	Third Party Payment
	Advantages for Payees
	Disadvantages for Consumers?
	Background
	"Medical Information"
Fair Credit Regulation Restricts Use of Medical Information	Examples of Not Evaluating Credit
	Unsolicited Medical Information
	Financial Information Exception
	Permitted Gathering of Financial Information
	Proper Financial Use of Medical Information
	Improper Use of Medical Information
	Other Permitted Exceptions
	Proper Use of Exceptions
	Limits on Re-disclosure

Title	Subtitle
	Affiliate Sharing
	Background
	Who Uses “Telephone Checks”?
Fed’s Warranty of Authorization for “Telephone Checks”	What Checks are Covered?
	Warranty of Authorization
	FTC Telemarketing Rule
	Interviewing the Customer
	Removing the “Midnight Deadline”
	Fraud and Errors
	Limitation on Returning Checks
	The OBA’s Involvement
	Written Bank Policies
Homestead Exemption in Oklahoma Bankruptcies: What’s the Dollar Limit?	Specific Provisions
Processing through Dallas Fed Affects Availability Schedule	a. Safeguarding Customer Information
FDIC Guidance on Establishing a Bank Ethics Program	b. Integrity of Bank Records
	c. Strong Internal Controls
	d. Speaking Candidly with Examiners
	e. Accepting Gifts and Favors
	f. Avoiding Self-Dealing
	g. Observing Other Laws
	h. Other Matters
	Using a Real Payee
	Endorsement Risk

Title	Subtitle
Important Issues in Establishing Tragedy Accounts	Tragedy Victim as Owner?
	Tax-Deductible Entity
	Setting up a Trust
	UTMA Account
	Risk-Based Approach
	Bank-Sponsored Account
	Appraisal Methods
	Appraising Lots to be Developed
Guidelines for Residential Tract Development Loans	Loan-to-Value Ratios
	Single-Unit Construction Loans
	Substituting/Releasing Collateral
	What is the Loan Amount?
	Commitment Duration
	Developing Too Many Lots
	Loans Exceeding LTV Ratios
	L.O.C. Borrowing Base
Small Intermediate Banks and Changes in CRA Regulations	
Post-Closing "Real-Estate-Related" Fees are Finance Charges	
Banks Sharing Information about Former Employees	
More Details on Lottery Accounts	
Public Employees' Payroll Deductions to Financial Institutions	Bankruptcy Chapter Eligibility for Consumers and Individuals

Title	Subtitle
FDIC Statistics for Oklahoma	a. Chapters and Restrictions
The Bankruptcy Abuse Prevention and Consumer Protection Act of 2005	b. Credit Counseling
	Notices
	Exemptions
	Statement of Intent, Redemption, and Reaffirmation
	Discharge
	Needs-Based Bankruptcy, Presumption of Abuse, Means Test
	The Automatic Stay
	ATV's will have Tax Commission decals (similar to boats), not license tags.
"Four-Wheelers" Require Certificates of Title and Lien Entries	
Continuing Liens for Repair of Farm Equipment	
Mechanic's Lien Provisions Changed for Motor Vehicles	
Changes in Items of Property Exempt in Bankruptcy	a. Increased Late Fees
Amendments to Family Wealth Preservation Act	b. "508B" and "508A" Loans
Consumer Loan Dollar Amounts Adjusting on July 1	c. Dealer Paper "No Deficiency" Amount
	Background
	Expanded Emphasis of Disclosures
Regulation DD's Amendments Cover Overdraft Plans	Advertising "Free" Accounts
	General Advertising Requirements

Title	Subtitle
	Misleading or Inaccurate Advertising
	Revised Truth-in-Savings Disclosures
	Periodic Statement Disclosures
	Itemizing Fees by Type
	Background
	Basic Due-Diligence Requirements for All MSB Accounts
Regulators Issue Guidance on Money Services Businesses	Performing Risk Assessments
	Risk Indicators
	Due Diligence for Higher-Risk Customers
	Suspicious Activity Reporting
	Review of Existing MSB Accounts
	Banks Not Regulators of MSB's
	Guidance to MSB's
	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?
Guidance on the Final CIP Rule	2. Will an HDHP pay for all medical expenses after the deductible and maximum "out-of-pocket expenses" are met?
Questions & Answers on Health Savings Accounts	3. Will being insured under an HDHP help to control medical expenses, in contrast to coverage under a standard low-deductible insurance policy?
	4. In what circumstances would an HDHP be an attractive alternative?

Title	Subtitle
	5. Is there a timing problem in using HSA balances to pay medical expenses that fall within an HDHP's deductible?
	6. How do FSA payments differ from HSA payments?
	7. Will an FSA still be available to someone who has an HSA?
	8. What expenses can be paid from an FSA?
	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?
	10. Is an HSA exempt from garnishment, levy, and set-off in Oklahoma?
	11. Can an HSA be pledged to a lender as collateral for a loan?
	12. In what ways would filing tax returns and keeping related records be more complicated for a person who has an HSA?
	13. Will an employee with an HDHP have more paperwork to handle, compared to low-deductible health insurance?
	1. Background
	2. Safety and Soundness
Banking Agencies' Joint Guidance on Overdraft Protection	a. Account-Approval Standards
	b. Ongoing Monitoring
	c. Delinquencies and Charge-offs
	d. Call Report Treatment
	e. Vendors
	3. Legal Risks

Title	Subtitle
	a. FTC Act/Advertising
	b. TILA/Reg Z
	c. Equal Credit
	d. Truth in Savings
	e. EFT Act
	4. Best Practices
	a. Marketing and Communications
	b. Program Features and Operation
	Background
	What is an HDHP?
Explanation of Health Savings Accounts	What's the Advantage of an HDHP?
	What Are the Tax Advantages of an HSA?
	Establishing HSA's at a Bank
	Special Limitations on HSA Contributions
	Qualifying Medical Expenses
	Broadened Emphasis
	What Information?
Guidelines on Security & Disposal of "Consumer Information"	Changes in Procedures and Contracts?
	Where to Find the New Provisions.
	Some Information-Protection and Information-Disposal Issues and Examples
	a. Directors' Packets.
	b. E-mails and Files on a Computer
	c. Files and Other Paper Documents.

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