# **Compliance Town Hall**



March 20, 2024

# Housekeeping

Your lines will be muted throughout the presentation, but your participation is welcome.

Please enter questions on the **Q&A** tab at any time.

You'll receive a copy of the presentation slides and a recording within two business days following the webinar. All questions (1)

Lee 01:54 PM

Will there be a follow-up session?

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Comment

Type your question here...

# Juliana Maneno Compliance Analyst, Advisory

Joined Jack Henry in 2019

Supports company compliance initiatives, federal laws and regulations, best practices, and industry standards

Implements compliance regulations into business processes

Communicates understanding of current legislation

Tracks new and pending legislation to ensure continued compliance

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## Jeff Paris Senior Product Manager

Joined Jack Henry in 1998

Manages a large portion of Symitar® core functionality: Member Services functionality: ACH, dividends, drafts, fees, holds, members, teller transactions, and wires

Reporting functionality: CTR and IRS

General Ledger functionality: Accounts payable and Teller Balancing

Manages product backlogs, moderates IdeaLab submissions and works with product development teams to deliver and communicate core enhancements

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Joined Jack Henry in 2021

Provides software support and guidance for Symitar Lending

Credit Card subject matter expert

Has 15 years of industry experience

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# Barbara Fraire Senior Product Manager

Joined Jack Henry in 1994

Instrumental member of the project that delivered Symitar's first online documentation

Moved into Education and instructional design

Spent more than 20 years developing training on subjects ranging from PowerOn®, Symitar PowerFrame Docs™, and SymXchange™ to Member Business Services and Lending

Currently serving in Product Development as the product manager for Symitar Lending and Commercial Services



# Paul Kumbier Technical Product Manager

Joined Jack Henry in November 2023

Product Management for Symitar® Card Services

Manages product backlog, moderates IdeaLab submissions and works with Card Services programming team to deliver and communicate enhancements

Nearly 25 years of card payments transaction processing and core integration experience

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# Stacy Hinderlitter Senior Application Support Analyst

Joined Jack Henry in 2012

Manages customer's existing products/processes and consults with customers

Identifies and resolves application and service issues and any other questions

Provides guidance to team members on project tasks and requirements, offers technical expertise on unique or advance problems, and trains less experienced peers

Prepares training materials and documentation for customers and internal uses

Contributes to process and product improvements project as subject matter expert

Provides software support/guidance by answering questions on functions, features and usage of software products.

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# Agenda

- Solutions to Frequently Asked Questions
  Lending
  - Credit reporting parameters, Metro 2<sup>®</sup> vs. Metro 1, Ioan cycle timing, credit card minimum payment

#### Applications

- Dividends posting exception report, anniversary dividend exceptions, account batch warning exceptions
- 2024 Symitar<sup>®</sup> compliance enhancements
- Features on the Horizon
- 2024 Compliance calendar review
- Compliance resources
- Q & A

# Lending

# In this section

- What are credit retrieval parameters?
- Metro 2<sup>®</sup> (versions 1 & 2)
- Why didn't the due date advance?
- What is the minimum credit card payment?



# What are Credit Retrieval Parameters?

### What are Credit Retrieval Parameters?

There are two ways the system can hold defaults for your credit retrieval requests.

- CRS.CFG: A configuration programmed "behind the scenes"
- CRS Parameters: In Parameter Manager

If there is only one set of credentials for each bureau, we encourage you to switch to CRS Parameters.

Using CRS Parameters allows independent maintenance of defaults. Some bottom-line benefits are:

- You no longer need a billable CWR for JH to program the defaults
- You no longer need JH to encrypt Experian<sup>®</sup> passwords
- Risk Models or Optional Features are initiated without help from JH

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#### • What are Credit Retrieval Parameters?

	🎯 Parameter Manager			
Experian	Credit Retrieval Parameters	General Forameters	je:	11111111
Password: ************************************	General Parameters Experian Equifax TransUnion ChexSystems	Use CRS Parameters: Yes Default Bureau: 1 Experian	ration: re Code: ID: rord: rord Expiration: Code: Expiration: c: ent:	**************************************

# **CRS Parameter Fields**

Update CRS Parameters with your credit union preferences.

Change the Use CRS Parameters parameter to YES.

Take CRS off host and bring it back on host in Device Control.

# Metro 2<sup>®</sup> (versions 1 & 2)

### • Metro 2<sup>®</sup> (versions 1 & 2)

# **Report Tape Format**

Metro 2 Episys v. 1 is obsolete. If using this setting:

- Credit report file is inaccurate
- Reporting values are not recognized
- Requires an internal "project" to update
- Do not switch the Report Tape Format field until testing has been completed and all bureaus that receive your file have certified the test files

•
General Parameters
Report Tape Format:    2 Metro 2 Format (Episys v.      Last Report Date:    09/30/203      Payment History Logic:    0 Do not include delinquencies between reporting date      Name Logic:    2 Report pledge and loan names on      Share Account Type:    8      Credit Card Bal Option:    0 Balance + Unpaid Interest + Late Charge
ger
•
General Parameters
Report Tape Format:    1 Metro 2 Format (Episys v.:      Last Report Date:    09/30/203      Payment History Logic:    0 Do not include delinquencies between reporting date      Name Logic:    2 Report pledge and loan names on      Share Account Type:    8

# Why didn't the due date advance?

# Why didn't the due date advance?

This could be for a few reasons:

- The member paid too early
- Recent file maintenance changes in the loan
  were incomplete
- The member has met their maximum due date



# The member paid too early

Although the generally mindset is "I am due on the 1st, I can make my payment on or after the 1st for the month", that is not how the system works.

A payment cycle is not only "when the payment is due"; it is also "when the payment to the loan can be made and have it applied to that payment due."

For most consumer loans, the member can make a payment almost a month before they are due, and the system will advance the due date. In this example, the member is due for 10/1.

But the **Beginning Cycle Date** field is set to 9/2—almost a month before. This means, that if the member makes their full payment amount on or after 9/2, the system will advance the due date. If the member had a due date of 10/1, and they made a payment before 9/2, the system would not advance the due date. That payment would be thought of as an extra payment for the cycle before.



# Defining a cycle

Recent file maintenance changes in the loan were incomplete.

When a member wants to make a change to the due date, update the **Due Day 1**, **Due Date**, and **BCD Day 1** fields.

**Exception**: If the Loan meets the following Loan products, the **BCD Day 1** field may need to stay the same.

- Interest-only loan
- Credit card
- Loan for which the system calculates a different payment every month



# What is the minimum credit card payment?

# Credit Card Minimum Payment

We have seen an increase in cases where credit unions are concerned that the minimum payment set by the Interest Type Parameter isn't enough to satisfy the interest accrued for the credit card during that statement cycle. Since we are in a rising rate environment, it might be beneficial for credit unions to evaluate their Interest Type Parameters **Payment Percentage** field.

If the credit union has further questions, they can open up a case with Lending Support and we will be more than happy to assist with their questions.

# Application

# In this section

- Dividend Posting Exceptions *Source*: Dividend Posting batch program
- Anniversary Dividend Exceptions
  Source: Daily Posting batch program
- Account Batch Warning

**Source:** ACH Posting, Daily Posting, Dividend Posting, Draft Posting, EFT Batch File Maintenance, Fee Posting, Insurance Posting, Miscellaneous Posting, Payroll Posting, Rate Change Processing, and Wire Posting batch programs



# Dividends Posting Exception Report

Sample footer text

#### **Report Sample** Dividend Posting exceptions

•	Account	ID	Name	Secondary	ID	Pmt Made	Required	Funds Ava	ail	Description	•	
٠											•	•
٠	0000000000	0030	BROWN, JANE	00000000000	0074		22.44	22.44 *	Share	Closed	•	
•	0010000000	0030	PUBLIC, JOHN				0.00	151.25*	Accoun	nt Batch Warning		
•	0000000000	0030	JOHNSON, JAME	1			2.85	2.85 *	Share	Not Found		
•	0000000000	0032	BROWN, JOHN					100.56*	Insuff	ficient Transfer List		
•	0000000000	0000	******	0000000000	0000		000.00	000.00* 1	Withhol	ding amts exceed distribution		
an	nt										•	•
٠											•	
•	Exception (	Count:	: 0,000		Unpo	osted Amou	unt: 00,00	00.00				

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# • Anniversary Dividend Exceptions

Report Sample Anniversary Dividend Exceptions											
•	Account	ID	Name	Secondary	ID	Pmt Made Requ	ired Funds A	vail	Description	-	
•		0030	BROWN, JANE	00000000000	0074	22.	 4.4	Share	Closed		
			PUBLIC, JOHN	0000000000	0074	0.0			nt Batch Warning	•	
			JOHNSON, JAME			2.8			Not Found		•
•	0000000000	0032	BROWN, JOHN				100.56*	Insuf	ficient Transfer List		
•	0000000000	0000	******	0000000000	0000	000	.00 000.00*	Withho	lding amts exceed distribution		•
â	amt										
۰										•	
•	Exception	Count	: 0,000		Unp	osted Amount:	00,000.00			•	
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# Account Batch Warning Exceptions

Account S/L,	/X ID Description	Override Warning Code
0000007406	(Account Batch Warning)	NO BATCH POSTING ALLOWED
0000010371 s	15 (Share Batch Warning)	NO BATCH POSTING ALLOWED
0000024531	(Account Batch Warning)	NO BATCH POSTING ALLOWED
000000000 s	0000 Share Batch Warning	
000000000 s	0010 Share Charged Off	
000000000 s	0001 Share Closed	
000000000 s	0002 Share Closed	
000000000 r	0006 Loan Closed	
0000000000 s	0011 Share Charged Off	
000000000 г	0001 Loan Charged Off	
000000000 г	0002 Loan Closed	
000000000 г	0062(Loan Batch Warning)	DELINQUENT LOAN
0000000000 s	0018 Share Closed	
000000000 r	0051 Loan Closed	
000000000 r	0096(Loan Batch Warning)	WARNING NUMBER 96
0000000000 s	0018 Share Closed	
0000000000 s	0055 Share Batch Warning	
000000000 s	0055 Share Batch Warning	
0000000000	Account Closed	
0000000000	(Account Batch Warning)	DELINQUENT LOAN
000000000 г	0010(Loan Batch Warning)	DELINQUENT LOAN
000000000 L	0020 Loan Closed	
0000000000 s	0000(Share Batch Warning)	WARNINGNUMBER 10
000000000 s	0011(Share Batch Warning	
000000000 x	0000 (XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX
x 000000000 x	0000xxxxxxxxxxxxxxxxxxxxxx	

Exception Count: 00,000

## **CTR Batch Creation Exceptions**

This report lists exceptions that occurred during Currency Transaction Report (CTR) batch record creation, and the reason for the errors.

Source: CTR Processing batch program

Report Category: CASHNEGINS

#### **Report Sample**

Your Credit Union Name Here	CTR Batch	Creation	Excep	tions	00/00/00	at 11/11/1	1 00:00	Seq	000000	Page	1
Error: CTR Branch record not created					 						
CTR Nbr Account S/L ID 000000108 S 0000											
Error processing a GL Transaction:											
Account S/L ID Amoun 0000211870 S 0000 25,000.0		_		Date 06/01/03	_	Sequence 414					
Error: CTR Account record not created -											
CTR Nbr Account S/L ID 000000108 S 0000					 						

# 2024 Symitar<sup>®</sup> Compliance Enhancements

- Standardize Re-Amortization of Non-Credit Card Loans with Active Promos
  - Modified the logic for determining whether a promotional rate applies to a new balance after an add-on
    - Ensures that the re-amortized payment calculated for a loan with a value in the Payment Calc Type field the payment that is calculated by the Loan File Maintenance Processing batch program

Provide New Field Options for HMDA Reporting

## For 2024 reporting, new options are available for:

- Automated Underwriting 1-5 fields in Application record
  - (7) Internal Proprietary System
- **Applicant Scoring Model** field in Application Person record
  - (11) FICO Score 9
  - (12) FICO Score 8
  - (13) FICO Score 10
  - (14) FICO Score 10T
  - (15) Vantage Score 4.0

Continue to use the corresponding **Other** fields until R2024.00 is loaded.

 A specfile to assist you in updating these records to use the new options will be available on JH Marketplace

## Minimum Payment Disclosure for Credit Card Loans Included in the Data-Only Statement for Loans that Will Never Pay Off

Although provided on the standard and laser statement formats, the minimum payment disclosure was missing from the data-only statement file

- To correct this problem, we changed data values for two fields in the file:
  - In record 503, field 01, value of Not Possible (for payoff) changed from 0 to 2
  - In record 503, field 07, value of Months (until payoff) changed from 0 to 2
- Make sure to communicate this information to your statement vendor

# ISO 20022 Wire Format Part 2

- Added new fields to Wire record to support the ISO 20022 format
- Added new parameter to control wire message format and processing

Wire Miscellaneous Parameters							
OK Cancel							
Fed Format:	ISO 20022 ${\scriptstyle \lor}$						
Default Business Function Code:	FAIM						
Outgoing Member Wire GL Offset: ISO 20022							
Outgoing Corp Wire GL Offset:							

Create updated version of *Wire* wizard, Wire Posting Batch program, reports, and standard receipts

# Update Reg E Data and Logic

What is Regulation E?

- Regulation E was established by the Federal Reserve Board
- Outlines rules for electronic funds transfer including debit cards and ACH transfers
- Intended to protect consumer



# **Update Reg E Data and Logic**



#### Merchant name not being displayed

- For the interfaces to CPS, Visa DPS, and Star NE, the merchant was coming through as numeric in some instances on debit card transactions.
- Removed Data Element 98 as the source of merchant name and added Data Element 48 or 43 for source of merchant name after consulting with CPS, Visa DPS, and Star NE.
# Features on the horizon

- Upcoming Compliance Features
  - Secure Act 2.0
    - Catch-up contributions
    - Age limits
  - 2024 IRS Yearly Updates and Changes
  - IRA Contributions Due to Federal Disaster
  - NAUPA
    - Format III
  - Section 1071 Dodd-Frank Act
    - On hold pending ruling from SCOTUS in June 2024

# Industry Updates

#### CUNA Mutual Name Change

- CUNA Mutual Group is now TruStage<sup>™</sup>
- To support the new branding, we created copies of the following PowerOn Library specfiles:
  - RB.CUNA.MONTHLY.EXTRACT > RB.TRUSTAGE.MONTHLY.EXTRACT
  - RB.CUNA.MONTHLY.EXTRACT.2006 > RB.TRUSTAGE.MONTHLY.EXTRACT.06
  - RB.INS.PARTICIPATION.CUNAMUTUAL > RB.INS.PARTICIPATION.TRUSTAGE
- The CUNA-branded versions of these specfiles will be removed in Symitar Release 2025.00

**Note:** Additional brand name changes are being made on a client-by-client basis to edit runs. Credit unions that have CUNA-branded specfiles will be contacted by Jack Henry to facilitate this effort.

# 2024 Final Rules compliance calendar

#### • For Clients Portal

jack henry <sup>™</sup>		Admins  <u>Change My Password  My Alerts  My Links</u>   <u>Sign Out</u> e Case  <u>Case Search  Site Help</u>   JHA University  <u>Compliance</u>
Products & Services Tools/Administration Co	Dilaboration Discover More Search by Case ID	Search this site
Symitar		
For Clients > Products & Services > Core Solution > Sy Core Solution CIF 20/20		Support
<ul> <li>Core Director</li> <li>CruiseNet</li> <li>SilverLake System</li> <li>Symitar</li> <li>Xperience</li> </ul>		<ul> <li><u>Contact Support</u></li> <li><u>Symitar Organization Chart</u></li> <li><u>Product Management</u></li> </ul>
H Business Intelligence & Financial Performance     H Imaging Solutions		Support Procedures
<ul> <li>Information Security &amp; Risk Management</li> <li>JHA Payment Solutions</li> </ul>		Vendor Integration Program (VIP)     Gotchal
+ Online & Mobile		Symitar eDocs
Operational Enhancement     Solutions		Symitar Education
+ Outsourcing		Symitar Supported Hardware
+ Retail Delivery		Hardware Integration Program (HIP)

#### • 2024 Final Rule

#### **HMDA** Threshold

#### 01/01/2024

**Regulation Z Threshold Adjustments** 

01/01/2024

**Beneficial Ownership** 

01/01/2024

**Regulation M Threshold Adjustments** 

01/01/2024

Regulation Z (credit cards, HOEPA, qualified mortgages)

01/01/2024

Fair Credit Reporting Act (FCRA)

01/01/2024

#### • 2024 Final Rule

Appraisals for Higher-Priced Mortgage Loans Exemption

01/01/2024

#### Fair Credit Reporting Act; File Disclosure

01/23/2024

Supervisory Appeals Process

02/22/2024

**Credit Card Penalty Fees** 

05/14/2024

Small Business Lending (Regulation B)

Pending



## **Credit Card Penalty Fees**

- Scope: Issuers and affiliates with 1 million credit card accounts
- Lowers typical fee from \$32 to \$8
- Compliance date: May 14, 2024
- Symitar Core enhancement not required





## Small Business Lending under Regulation B

- Collect and report to the CFPB data on applications for credit for small businesses, including those that are owned by women or minorities.
- Effective: Pending
- Symitar will use a service being developed by LoanVantage<sup>™</sup>



# **Compliance resources**

• Symitar Compliance Resources





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<u>Compliance Town Hall</u> <u>Archive</u>



• Jack Henry Compliance Resources

#### **Symitar Release Information**



Regulatory Compliance Calendar



• Jack Henry Compliance Resources





### Upcoming Compliance Town Halls

June 26, 2024 September 18, 2024 December 4, 2024

## **Questions?**



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