

ACH & SAFE Act Audits:
Overlooked Symptoms

MCUL COMPLIANCE CONFERENCE
FEBRUARY 13, 2015

ACH Audit

ACH Audits

N° 5

- ▶ Stop Payment Language
 - ▶ Most CUs are using old forms or multiple forms
 - ▶ Language must be updated as rules are updated

ACH Audits

- ▶ Reg E Disclosures
 - ▶ Incorrect or inconsistent language

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ACH Audits



- ▶ OFAC Screens
 - ▶ OFAC should be run before the transaction is posted
 - ▶ CU is ultimately responsible, so rely on a third party at your own risk!

ACH Audits

- ▶ Business Continuity/Disaster Recovery
 - ▶ Plan doesn't adequately provide for resumption of ACH services
 - ▶ Testing is not conducted to demonstrate feasibility of plan



ACH Audits



- ▶ Not having an audit or ACH personnel conducting audit

SAFE Act Audit

SAFE Act Audits

N° 5

- ▶ Third Party Processors
 - ▶ Ensure contract establishes vendor responsibility to comply
 - ▶ Right to audit

SAFE Act Audits

- ▶ NMLS Listings not kept current



SAFE Act Audits



- ▶ Inadequate policies and procedures

SAFE Act Audits

- ▶ Mortgage Loan Officers not disclosing Unique Identifier Numbers



SAFE Act Audits



► Not having an audit

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