



July 29th, 2025 | Volume 1 | Issue 14

For MCUL Compliance, Advocacy and other news, check out the [MILeague Minute!](#)

Hello & Headlines

Hello!

I hope you all are enjoying the warm weather while you can. Before we know it, the snow will fall and we will be wishing it was this hot and sunny again! Just around the corner is our Executive Summit event on Mackinac Island, I hope to see some of you at that event and then before you know it, the team will be headed to Washington, D.C. for Hike the Hill. Be sure to check out our calendar of events and get registered!

On the NCUA front, a federal judge ordered the reinstatement of Todd Harper and Tonya Otsuka to the NCUA Board. Late Monday, July 22nd, U.S. District Judge Amir H. Ali ruled that the actions by President Trump to remove the two members of the NCUA Board were unlawful. The two were active participants in the July 24th board meeting. While the two were reinstated originally, a federal appeals court has now granted an immediate stay to the reinstatement of the dismissed board members. So as of this moment, the NCUA board is back to just one member—Chairman Hauptman. The stay will keep Harper and Otsuka off the board until the appeals process has been concluded. We will continued to keep you updated as the appeal progresses.

The NCUA also released its *Office of the Ombudsman 2024 Annual Report* which you can view [here](#). The report shows the Office of the Ombudsman:

- Processed 44 inquiries and complaints related to data breaches and cyber threats at federally insured credit unions;
- Made one recommendation to the NCUA Board about the agency’s complaint process; and
- Resolved 598 inquiries during 2024.

The CFPB has been fairly quiet. With the reduction in funding that came from the federal budget bill and likely inevitable continued reduction in workforce, we will be keeping a close eye on what is or isn’t coming out of the Agency in the coming weeks.

As always, if you have any questions or comments, please do not hesitate to reach out.

Cheers!
Haleigh

Some headlines you might have missed:

- **America’s Credit Unions:**
 - Compliance Blog: Merchant of Venice – er, of RECORD ([Click to Read](#))
 - Compliance Blog: Stable Coin as Collateral ([Click to Read](#))
 - Compliance Blog: Conversion to Digital Payments by the Treasury Department ([Click to Read](#))
- **Credit Union Times:**
 - Trump Administration Appeals Judge’s Ruling to Reinstate Harper & Otsuka ([Click to Read](#))
 - Credit Union Group Urges NCUA to Authorize Digital Asset Custody ([Click to Read](#))
 - Credit Union Leaders Back Rep. Maxine Water’s Bill to Boost De Novo Institutions ([Click to Read](#))
- **American Banker:**
 - Budget bill, SCOTUS give ‘clear path’ to CFPB firings ([Click to Read](#))
 - Republicans gear up for Dodd-Frank rollback ([Click to Read](#))

Compliance Events

MCUL Compliance Office Hours

Formerly SAS Compliance Office Hours, the group has been expanded to all credit unions in MI, regardless of size. Join us each month where we’ll discuss recent compliance and regulatory updates, work through your compliance challenges, and have the opportunity to share resources, insights and other information with peers. You don’t want to miss these calls!

When: 1st Friday of every month, unless otherwise noted
Time: 9:00 am

Join us for the next session, scheduled for **Friday, August 1st**.
[REGISTER HERE](#)

League InfoSight Masterclass™
October 6-10, 2025
The Henry Center, Lansing
https://cvent.me/wkVBIL?RefId=LIS_IS

MCUL Education Training & Events

Make sure you check out our MCUL Education master calendar to find all the latest information on the wonderful events our team is hosting!

[Link to MCUL Education Calendar](#)

<p>A Refresher on Money Market Accounts</p> <p>The InfoSight360 team has received several questions recently regarding money market accounts. The rules and restrictions related to these types of accounts have changed significantly since the COVID-19 pandemic. Let’s take this opportunity to review where things stand in 2025.</p> <p>Regulation D differentiates between transaction accounts, like checking accounts, and savings deposits. Previously, institutions were required to maintain reserves on the daily average balance of their transaction accounts. Regulation D classifies money market accounts as savings deposits, which are exempt from this reserve requirement. However, savings deposits have traditionally been subject to a limit of no more than six transactions per month.</p> <p>On March 29, 2020, the Federal Reserve lowered the reserve requirement in connection with transaction accounts to 0%. This provided money market account holders with additional flexibility. Even if a member exceeded the six-transaction limit on his/her money market account, essentially re-classifying it as a transaction account, the credit union was not required to maintain reserves in connection with that account.</p> <p>On April 23, 2020, the Federal Reserve issued an interim final rule eliminating the six-transaction limit in connection with savings deposits. That rule, still in effect today, is permissive, meaning the institution has the following options when it comes to its money market accounts:</p> <ul style="list-style-type: none"> Continue to enforce the six transaction per month limit, Temporarily suspend enforcement of the limitation and enforce it again later, or Eliminate the transaction limitation altogether. <p>Additional information is available from the Reserve Requirements – Regulation D channel in InfoSight360. There are also a couple of model policies available within CU PolicyPro that credit unions may find helpful. The first is model policy #2210 – Accounts. The second is model policy #9420 – Regulation D: Monetary Control Act.</p>	
<p>GENIUS Act to Establish Regulatory Framework for Stablecoin</p> <p>On July 18th, President Trump signed into law the Guiding and Establishing National Innovation for US Stablecoins (GENIUS) Act. The Act will take effect upon the earlier of:</p> <ul style="list-style-type: none"> 18 months following its enactment (e.g., January 18, 2027), or 120 days after regulations implementing the Act have been issued. <p>The requirements of the Act will apply to payment stablecoins, defined as any digital asset that is used as a means of payment or settlement. Under the Act, payment stablecoins may only be issued by a “permitted stablecoin issuer”. Permitted issuers include a subsidiary of an insured depository institution that has been approved by the institution’s primary federal regulator (e.g., the National Credit Union Administration).</p> <p>A permitted stablecoin issuer must hold 1:1 reserves in US dollars or other highly liquid assets such as cash, bank deposits, or other short-term, low-risk securities such as US Treasuries. In addition, the Act clarifies that payment stablecoin issuers will be subject to the requirements of the Bank Secrecy Act, including customer due diligence, transaction monitoring, suspicious activity reporting, and OFAC compliance.</p> <p>You can access the Act here. InfoSight360 will have much more to offer on this topic as the US Treasury and other primary federal payment stablecoin regulators release the regulations necessary to implement the requirements of the Act.</p>	
<p>Open Comment Calls</p>	
<p>If you have input on any comment calls below that you would like to provide for consideration, please direct them to Haleigh.Krombeen@mcuol.org no later than 3 weeks prior to the comment due date.</p>	
<p>NCUA Informal Request for Feedback: Operations and Initiatives; 2026-2030 Strategic Plan</p> <p>Docket No. n/a</p> <p>In preparation for the development of the NCUA’s <i>2026-2030 Strategic Plan</i> and the agency’s 2026-2027 budget, Chairman Kyle Hauptman is inviting stakeholders to review the agency’s 2022-2026 Strategic Plan and provide your feedback and ideas. “Tell us what’s overly burdensome, what could be done better or quicker, and what do you think NCUA is doing that is not creating value,” Chairman Hauptman said.</p> <p>As part of its compliance with Executive Order 14210, Implementing the President’s “Department of Government Efficiency” Workforce Optimization Initiative, the NCUA implemented its Voluntary Separation Program to reduce the size of its workforce. The NCUA is also restructuring its operations to improve its effectiveness and efficiency while protecting the system of cooperative credit and its member-owners. The agency anticipates the <i>2026-2030 Strategic Plan</i> will further reinforce NCUA’s changes under the leadership of Chairman Hauptman consistent with the goals of Executive Order 14210.</p> <p>Note that comments are not being collected through the typical regulatory comment process. Credit unions wishing to provide feedback and suggestions can do so by emailing them to AskNCUA@ncua.gov. No comment due date has been provided.</p> <p>Related Materials:</p> <ul style="list-style-type: none"> NCUA 2022-2026 Strategic Plan NCUA 2024/2025 Budget Presentation <ul style="list-style-type: none"> NCUA 2025/2026 Budget Justification 	<p>Comments Due: No Date Provided</p> <p>Agency Announcement</p> <p><i>Federal Register</i></p> <p><i>Regulations.gov</i></p>
<p>The Department of Housing and Urban Development (HUD) Request for Information (RFI): Buy Now Pay Later Unsecured Debt</p> <p>The Department of Housing and Urban Development (HUD), released a request for information to better understand the implications of Buy Now Pay Later (BNPL) lending on housing affordability and stability. Highlights include:</p> <ul style="list-style-type: none"> As consumers take on additional short-term debt obligations through BNPL services, HUD is concerned that their capacity to manage housing-related expenses, such as rent or mortgage payments, may be affected. Currently, FHA policies largely exclude BNPL from consideration in underwriting because closed-end debts do not have to be included if they will be paid off within 10 months from the date of closing and the cumulative payments of all such debts are less than or equal to 5 percent of the borrower’s gross monthly income. 	<p>Comments Due: August 25, 2025</p> <p>Federal Register</p>
<p>Interagency Request for Information (RFI): Potential Actions to Address Payments Fraud</p>	<p>Comments Due: September 18, 2025</p> <p>Federal Register</p>

<p>The Federal Deposit Insurance Corporation (FDIC), U.S. Department of Treasury (Treasury), Board of Governors of the Federal Reserve System (Board) and Office of the Comptroller of the Currency (OCC), have jointly issued a Request for Information (RFI) and invite the publics input on ways the agencies can take action collectively or to help consumers, businesses, and financial institutions mitigate check, automated clearing house (ACH), wire and instant payment fraud.</p> <p>Related Materials:</p> <ul style="list-style-type: none">America’s Credit Unions Summary	<p>Feedback to America’s Credit Unions Due: September 1, 2025</p> <p>Submit Feedback</p>
<p>NCUA Request for Comment: Regulatory Publication and Voluntary Review as Contemplated by the Economic Growth and Regulatory Paperwork Reduction Act of 1996.</p> <p>The NCUA will be reviewing the following parts of its regulations:</p> <ul style="list-style-type: none">Part 700 (Definitions);Part 701 (Federal Credit Union Operations);Part 702 (Capital Adequacy);Parts 708a and 708b (Conversions and Mergers);Part 709 (Involuntary Liquidation);Part 710 (Voluntary Liquidation); andPart 711 (Management Official Interlocks). <p>The rules that are being reviewed cover critical operational and structural components of credit unions and the credit union system as a whole.</p>	<p>Comments Due: October 08, 2025</p> <p>Federal Register</p>
<p>Questions, Comments, Concerns? We are here to help! Email us at ComplianceHelpline@mcu.org</p>	
<p>If this newsletter was forwarded to you and you’d like your own emailed copy, or wish to be removed from this list, please contact Haleigh.Krombeen@mcu.org</p>	