



September 9th, 2025 | Volume 1 | Issue 17

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

Hello & Headlines

Hello!

With the first football games of the season under our belt and my fall decorations up, I think it’s almost time to say goodbye to summer (almost). Don’t forget to register for the League InfoSight Masterclass coming up next month. And with that let’s jump into the updates!

I have a very exciting update this week. We have a new team member joining the MCUL, her name is JaMille Rauls and she is our new Regulatory Advocacy and Compliance Specialist. She comes to us from credit union land and has a wealth of experience and knowledge (especially on all things fraud). I hope you all will join me in welcoming her with open arms!

On the NCUA front, we are still waiting on the outcome of the appeal to see whether Harper and Otsuka will be reinstated to the NCUA board. This will not happen prior to the next board meeting, which is on September 18th. As a reminder the NCUA is also having a virtual town hall on September 9th at 2:00 p.m. This town hall will give the industry an opportunity to provide input on the agency’s strategic plan and upcoming agency priorities. It appears registration has already closed but there will be a recap of this town hall in the next edition of Reg Corner. If you are interested, a copy of the strategic plan can be found [here](#).

Also, late last week the NCUA announced that it would be dropping its “disparate impact” tests in response to the White House’s EO “Restoring Equality of Opportunity and Meritocracy” which was signed by the President in April. According to the NCUA, their examination and supervision processes will no longer include reviews for disparate impact, and the agency will no longer request, review, or conclude or follow-up on:

- Matters related to credit unions’ disparate impact risks;
- Internal disparate-impact risk analysis; and
- Disparate-impact risk assessment processes or procedures.

We are also working on finalizing the RFI on payments fraud that we will be submitting ahead of the September 18th deadline.

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: What is Included in the Remittance Transfer Tax ([Click to Read](#))
 - Compliance Blog: The Escrow Balance ([Click to Read](#))
 - Compliance Blog: Closing Accounts and Expulsion ([Click to Read](#))
- **Credit Union Times:**
 - NCUA Drops ‘Disparate Impact’ as Test for Racial Bias ([Click to Read](#))
 - America’s Credit Unions Urges NCUA to Pursue Capital Relief for Credit Unions ([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. We will also be looking for opportunities to include some elements from Cheers! to Compliance. You definitely 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, October 3rd**.
[REGISTER HERE](#)

League InfoSight Masterclass™

League InfoSight Masterclass is BACK!

We heard our Michigan credit unions loud and clear; they loved the Masterclass and wanted it back! After careful consideration of attendee feedback, we are excited to showcase a few changes that we feel will make it easier for more credit union employees to take advantage of this high-quality, local training!

1. The deposit account and branch operations training days are now back-to-back, and the lending training days (consumer lending and real estate lending) are also back-to-back. Send someone from your lending department and/or a branch manager to attend the whole week, or just the two days that are most relevant to their position.
2. Business Continuity Planning (BCP) has always been a hot topic, but examiners are focusing more on the credit union’s overall program. We knew we needed to add a day of training to get credit union employees and their team certified and up to date on how to create and maintain an effective plan. Attendees of the BCP certification will also receive a free trial of RecoveryPro!
3. We’ve added an advanced class for those attendees who received their League InfoSight Masterclass Certification last year, and for any seasoned compliance/risk employees who aren’t necessarily looking for a certification, but are interested in a more in-depth level of training. Attendees for this session should already have a foundational and practical knowledge of regulations.

The League InfoSight Masterclass program is unique and offers you the ability to learn about **BOTH** federal and **state** laws and regulations. You also don't have to travel too far from home and network with your Michigan credit union neighbors! We have fantastic speakers, so you will leave with new friends and valuable expertise. Take advantage of this opportunity today and [register, today!](#) We look forward to seeing you October 6-10th in East Lansing!

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](#)

INFOSIGHT360
Highlights

InfoSight360 Adds Branch Signage Checklist

InfoSight360 is happy to announce the addition of a branch signage checklist to its already extensive library of checklists available on the platform.

The checklist provides details concerning the signage required by each of the following federal laws and regulations:

- USA Patriot Act,
- NCUA Part 740,
- Electronic Fund Transfers Act,
- Expedited Funds Availability Act,
- Truth in Savings Act,
- Truth in Lending Act,
- Fair Housing Act, and
- Home Mortgage Disclosure Act.

There is also information related to shared branching, non-deposit investment products, and financial statements.

The branch signage checklist is available on InfoSight360 under InfoSight/Checklists. It is also linked as an additional resource under each of the specific channels referenced above.

Questions about the checklist may be directed to the InfoSight360 team at info@infosight360.com.

CFPB Seeks Input on Personal Financial Data Rights Rule Rewrite

As previously reported, the Consumer Financial Protection Bureau (CFPB) indicated in a July 29th court filing that it planned to engage in an “accelerated rulemaking process” to rewrite its personal financial data rights rule finalized in October 2024. That process has now begun.

The agency published an advance notice of proposed rulemaking (ANPR) in the Federal Register on August 22nd seeking comment on four specific issues it plans to address in the rewrite:

- The Dodd-Frank Act permits a consumer and/or representative acting on behalf of the consumer to request covered data from a financial institution. The CFPB seeks comment on who should be allowed to serve as a representative acting on behalf of the consumer.
- Under the final rule in its current form, a financial institution is prohibited from imposing any fee and/or charge on a consumer when fulfilling an information request. The ANPR asks whether the Dodd-Frank Act specifically requires this, and if so, what steps a financial institution should be allowed to take to defray some of its costs associated with fulfilling the information request.
- The final rule requires financial institutions to have appropriate safeguards in place to protect against malicious actors in the use, retention, and transmission of consumer financial data. The CFPB seeks comment as to whether the final rule’s information security standards go far enough.
- The final rule requires a financial institution to obtain express informed consent from the consumer before making his/her consumer financial data available to a third-party. The ANPR seeks comment as to whether the rule, in its current form, provides adequate consumer privacy protection.

Comments to the ANPR, available [here](#), must be received by October 21, 2025.

NCUA Launches AI Resource Webpage

The National Credit Union Administration (NCUA) has launched a webpage that contains several resources for credit unions as they consider the adoption and implementation of artificial intelligence (AI) technology. The webpage, available [here](#), provides several resources categorized as follows:

- AI Uses and Opportunities
 - The webpage contains a link to a report published by the US Department of Treasury that examines both traditional AI applications as well as emerging generative AI technologies that may be useful in the financial services landscape.
- Third-Party Due Diligence
 - A key component of a credit union’s overall compliance management system is conducting appropriate due diligence over third-party vendors with which it does business. This of course extends to AI companies and solutions. The site references a couple of letters to credit unions that provide a framework for performing due diligence on third-party vendors.
- Data Security
 - The webpage provides a couple of resources related to information security, both published by the US Department of Homeland Security’s Cybersecurity and Infrastructure Security Agency (CISA). The first assists credit unions with deploying AI systems securely. The second helps credit unions protect against maliciously modified data.
- Fraud Risks
 - The webpage links to a FinCEN report that helps credit unions identify fraudulent activities involving AI, such as deep fake content. The report identifies red flags that a credit union should look for in identifying fake identification documents that may have been produced using artificial intelligence.

Open Comment Calls

If you have input on any comment calls below that you would like to provide for consideration, please direct them to Haleigh.Krombeen@mcul.org no later than 3 weeks prior to the comment due date.

<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>Comments Due: No Date Provided</p> <p>Agency Announcement</p> <p><i>Federal Register</i></p> <p><i>Regulations.gov</i></p>
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<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>Interagency Request for Information (RFI): Potential Actions to Address Payments Fraud</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> <p>America’s Credit Unions Summary</p>	<p>Comments Due: September 18, 2025</p> <p>Federal Register</p> <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); and• Part 711 (Management Official Interlocks). <ul style="list-style-type: none">• The rules that are being reviewed cover critical operational and structural components of credit unions and the credit union system as a whole.	<p>Comments Due: October 08, 2025</p> <p>Federal Register</p>
<p>NCUA Request for Comment: Economic Growth and Regulatory Paperwork Reduction Act (EGRPRA) Review.</p> <p>The NCUA is voluntarily reviewing its regulations to identify those that are outdated, unnecessary, or unduly burdensome to federally insured credit unions. This RFC invites federally insured credit unions to submit comments on regulations in the categories below:</p> <ul style="list-style-type: none">• Agency Programs including Community Development Revolving Loan Fund, Central Liquidity Facility and designation of low-income status.• Capital including capital adequacy and adequacy of reserves.• Consumer Protection including regulations related to share insurance, disclosure of share insurance, fair credit reporting, and truth in savings. <p>America’s Credit Unions Summary and breakdown of the RFC can be found here.</p>	<p>Comments Due: October 8, 2025</p> <p>Federal Register</p> <p>Feedback to America’s Credit Unions Due: September 17, 2025</p> <p>Submit Feedback</p>
<p>CFPB Advance Notice of Proposed Rulemaking (ANPR): Section 1033</p> <p>The CFPB is seeking comments and data to inform its consideration of four issues related to implementation of section 1033 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act). These issues are:</p> <ol style="list-style-type: none">1. The proper understanding of who can serve as a “representative” making a request on behalf of the consumer;2. The optimal approach to the assessment of fees to defray the costs incurred by a “covered person” in responding to a customer driven request;3. The threat and cost-benefit pictures for data security associated with section 1033 compliance; and4. The threat picture for data privacy associated with section 1033 compliance.	<p>Comments Due: October 21, 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>	