

ABA Bank Compliance

Volume 30, No.2

8 Shadow Wars: Managing an Effective Identity Theft Prevention Program

BY JOHN P. BONORA, CRCM

Compliance and risk officers across the country face the task of balancing effective controls to drive a successful program while not overwhelming business lines with duplicative procedures, timely documentary exercises, and costly IT systems. Program administrators also face unique obstacles surrounding oversight of service providers and the pioneering examination approach that certain regulators will utilize when assessing an institution's level of compliance. Moving forward, every financial institution will be a critical player in this shadow war against identity theft. Understanding how to overcome these obstacles will be the key to managing an effective yet sustainable program for your institution.

14 Recommendations for BSA Reform (Part 2)

BY ROBERT S. PASLEY

In the last issue of *ABA Bank Compliance*, the first and fifth recommendations—pertaining to the need for a BSA gatekeeper and the need for revisions with regard to the prosecution of BSA violations—were summarized and analyzed. This article addresses the second, third, and fourth recommendations, which deal with the need for an explicitly articulated risk-based BSA regime, the need for enhanced BSA-related feedback and transparency, and the need for streamlining and providing enhanced quality control over BSA-related reports and recordkeeping requirements.

22 What Is Your HMDA Data Telling You and Why Is It Important?

BY PHILLIP R. FREER, JR., CRCM, AND CALVIN R. HAGINS, CRCM

You might be asking yourself, why do we need another article covering the Home Mortgage Disclosure Act (HMDA)? For over 30 years, banks subject to HMDA have been collecting and reporting mortgage-related data, yet many banks continue to complain about the burden HMDA imposes on them. As we recently learned, HMDA data collection requirements change, and we also know that given recent market and political changes, it is possible that collection and reporting of additional data may be required. HMDA isn't going away. It is time to make the data work for you.

28 Managing Compliance Risk in Large Organizations

BY JOHN ATKINSON

Noting that both banking organizations and their compliance requirements have become more complex in recent years, last fall the Federal Reserve Board issued guidance to clarify regulatory expectations and address industry requests for more detail about how to manage compliance risk. Titled "Compliance Risk Management Programs and Oversight at Large Banking Organizations with Complex Compliance Profiles," this guidance was issued as a joint Supervision and Regulation Letter and Consumer Affairs Letter on October 16, 2008. In this article we will take a close look at the details of this letter, which will most assuredly be among the key areas of focus at upcoming examinations.

34 Managing Compliance within a Call Center

BY DENNIS C. WILSON, CRCM

You've updated your procedures, you've put in place backroom monitoring systems, and you've worked tirelessly on the training material. You reviewed the training records and all call center financial specialists (FS) have been trained. Now you can relax—or can you? The simple answer is no. Now begins the work of determining how best to monitor what occurs within your call center, from the initial inbound call until successful completion of the transaction. It involves more than customer satisfaction, although that is a big part of it. Regardless of whether the line of business is profitable, is it compliant? In this article, we will discuss some of the best practices our team has discovered to ensure compliance in the call center.

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Institute of Certified Bankers

A Subsidiary of the American Bankers Association

ABA Bank Compliance

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Article reprints are available in
quantities of 25 or more. For more
information, contact Ashley Zander
at The YGS Group at (800) 494-9051, ext.125.

POSTMASTER

Send address changes to *ABA Bank Compliance*,
American Bankers Association,
1120 Connecticut Avenue, N.W.,
Washington, DC 20036-3971.

Periodicals Postage Paid at Washington, DC,
and additional mailing offices.
Printed in the USA.

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ABA Bank Compliance (ISSN 0887-0187) is a product of ABA's Center for Regulatory Compliance. *ABA Bank Compliance* is published bimonthly.