

## 10 | Don't Get Caught in the UDAP Net: New Standards, Expanding Risks

Overall, the UDAP net has grown wider and is being cast even further by policy makers and regulators. In the end, this means there is greater likelihood that banking practices may be caught in the UDAP net.

BY THOMAS G. PAREIGAT AND MEG SCZYRBA, CRCM



## 18 | Effective Comment Letters Make a Difference

Bank compliance risk managers can either watch as others sculpt and mold their world, or they can help shape their environment through active involvement. Comment letter writing is one of the most effective ways to stay involved.

BY VIRGINIA O'NEILL AND PAT SHUTTERLY



## 28 | Assessing Compliance Resource Needs—Banks on the Leading Edge

This article guides the reader through the pertinent considerations, providing examples of “what can go wrong,” and concluding with the theme that each bank should take a risk-based approach in the appropriate allocation of compliance resources.

BY JAMES H. WISTMAN, MBA, CAMS, AND AARON KAHLER, CFE, CAMS



## 32 | AML and Anti-Fraud Convergence: Planning Your Roadmap

A holistic approach to combating financial crimes is crucial to avoid the costs of non-compliance and financial losses tied to fraud. Combining BSA /AML and anti-fraud programs can help arm the institution with the real-time data required for protection from threats.

BY TOM LEUCHTNER



### COLUMNS

#### 4 | Governance

BY PAUL OSBORNE, CPA, CPO, AMLP; DAVID FITES, CFIRS; AND CLAYTON MITCHELL, CFIRS

#### 8 | Compliance Management

BY CARL G. PRY, CRCM

#### 38 | The Other Side

BY STU LEHR, CRCM

### DEPARTMENTS

#### 40 | Regulatory Development Table

#### 42 | ABA Resources

#### 44 | Continuing Education Quiz

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