

## FEATURES

### 8 Post Forbearance

*Mortgage Servicing in the Age of COVID-19*

BY JASON BUSHBY, ESQ. AND GREG PIPES, ESQ.

Here we unpack the post-forbearance world, focusing on the transition out of forbearance and into other forms of loss mitigation assistance, including payment deferrals, repayment plans, and loan modifications. We also examine the interplay between investor/insurer requirements, federal law, and select state laws. This article follows Mortgage Forbearance in the Age of COVID-19 in the September–October issue, which addressed some of the key compliance considerations related to COVID-19 forbearance programs and how to overcome the challenges.

### 18 The Extreme Sport of BSA/AML Management (and the Interagency Program Expectations)

BY MAUREEN E. CAROLLO, CRCM, CAMS

There is no need to fear when managing your BSA/AML compliance program. Here we take a deep dive into the recently released guidance regarding enforcement from the Joint Agencies.

### 24 The Modern CRA Examination Playbook

*Exploring the evolving process for CRA examinations under the OCC's final rule*

BY BRIAN WATERS, CRCM

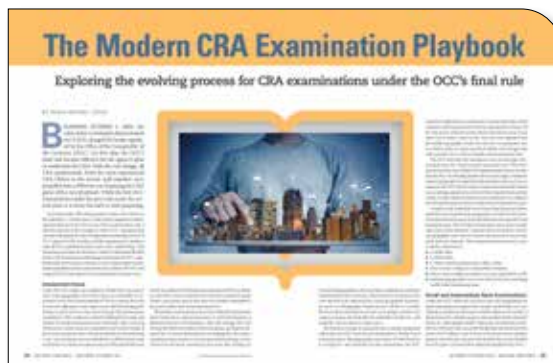
Here we discuss new requirements for how banks must delineate their assessment areas and how the OCC will conduct CRA examinations for national banks of all asset sizes. This article follows CRA Modernization is Here, Now What? in the September–October issue, which included major changes to which OCC-regulated banks will qualify for CRA consideration.

### 30 Mitigating Risks of Banking Money Service Businesses

*Building an Appropriate BSA/AML/OFAC Compliance Program*

BY JIM TREACY

Banks must ensure they assess the risks of banking money services businesses appropriately. Here we discuss the steps necessary to comply with applicable BSA/AML regulatory requirements.



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