



UDAAP -Yes It Applies to Your Bank (Webinar)

June 17, 2013 ☐ 3:30pm-5:00 pm

Our topic for this webinar will cover UDAAP –Unfair, Deceptive and (thanks to Dodd-Frank) Abusive Acts and practices. If your bank offers loans or deposit accounts, you need to have a game plan for the revised UDAAP standards. Don't be fooled that UDAP is simply a "big bank" problem. Since 2008, 43% of UDAP violations cited by the FDIC were for banks with total assets of **\$250 million or less**. A FDIC supervised community bank in Indiana (Marklebank) was surprised by an **\$82,500** fine for Reg E claims. The penalty was not assessed because of Reg E deficiencies, but under **UDAAP**. What did they do wrong? How does it compare to your Reg E investigation procedures?

PRESS RELEASE: September 24, 2012:

The FDIC and the Consumer Financial Protection Bureau (CFPB) announced a joint public enforcement action with an order requiring Discover Bank to refund approximately **\$200 million** to more than 3.5 million consumers and pay a **\$14 million civil money penalty**. This action results from an investigation started by the FDIC which the CFPB joined last year. The joint investigation concerned deceptive telemarketing and sales tactics used by Discover to mislead consumers into paying for various credit card "add-on products" – payment protection, credit score tracking, identity theft protection, and wallet protection. Source: <http://www.consumerfinance.gov/pressreleases/discover-consent-order/>

If you have customers, then this webinar is for you. Learn how Unfair or Deceptive or Abusive Acts or Practices (UDAAP) could apply to your bank. Topics covered in this session will be:

- ◆ The definition of UDAP and UDAAP , including examples of the standards for "unfair", "deceptive" and "abusive" acts or practices
- ◆ Discussion of potential risks and recent UDAP court cases
- ◆ Learn how UDAP problems can result in a lower CRA rating
- ◆ Managing Third Party Risks and UDAP
- ◆ What are the four "P's" of deception in advertising? Dos and don'ts from the FTC
- ◆ Potential impacts of the Dodd-Frank Act on UDAAP
- ◆ Best practices to avoid UDAP problems
- ◆ Helpful UDAP compliance resources and regulatory guidance, including FDIC Abusive Practices - Third Party Procedures (Exam procedures updated August 2012)

Who Will Benefit

Compliance Officers, Risk Managers, Senior Management, Branch Managers, Loan & Deposit Operation Managers, Marketing staff, and Product Development specialists will find this session very beneficial

Webinar Speaker

Susan Costonis is a compliance consultant and trainer. She frequently provides consulting services to financial institutions regarding fair lending and other compliance management issues. Her 34 year career in banking and training began with 20 years at First National Bank an affiliate of Wells Fargo Bank, in Fort Collins, CO. Susan has been a bank compliance consultant or compliance officer in Louisiana since 1998. During her career, Susan has successfully managed compliance programs and exams for institutions supervised by the OCC, FDIC, and Federal Reserve. She is a Certified Regulatory Compliance Manager and completed the ABA Graduate Compliance School and the Graduate Banking School of the University of Colorado. Susan regularly presents seminars to financial associations.