

BCG Monthly Telephone Briefing

April 2018

CFPB Prepaid Account Rule

On October 5, 2016 the Consumer Financial Protection Bureau issued the Prepaid Account Rule (“Prepaid Rule”). Under the new rule all accounts that meet the definition of “prepaid account” will be subject to Regulation E, along with several requirements specific to prepaid accounts. This includes two additional disclosure forms, an alternative error resolution procedure and limitations on liability for unverified prepaid accounts, and the submission and posting of all prepaid account agreements online. Initially the Prepaid Rule was set to become effective on October 1, 2017. However, after numerous amendments and a change of leadership at the CFPB, the Prepaid Rule is now scheduled to become effective on April 1, 2019 (unless further extended).

Our April BCG Telephone Briefing will provide a comprehensive overview of the Prepaid Rule in relation to Regulation E. We will also address the changes the rule makes to Regulation Z. Although the effective date is over a year away, the Prepaid Rule poses unique operational challenges and risks which financial institutions will have to understand and be prepared to deal with.

We will discuss:

- What is and what is not a “prepaid account”
- Modified disclosure requirements
- Periodic statement alternative
- Regulation E’s error resolution and limited liability requirements for unverified prepaid accounts
- Online submission and posting of prepaid account agreements
- Treatment under Regulation Z of hybrid prepaid-credit cards which can access overdraft credit features offered by a prepaid account issuer
- January 2018 Amendments



BCG Monthly Telephone Briefing

Friday, April 20
12:00 – 1:30 p.m.
(with live Q&A)

Presented by
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Aldrich & Bonnefin is hosting a Monthly Telephone Briefing for Bankers' Compliance Group® Members on **Friday, April 20**. This meeting will be presented live and will include a question and answer session. Members can ask questions by telephone or email. Each member that registers for the Monthly Telephone Briefing will be given a password and instructions to call in to the Briefing.

ORGANIZE YOUR PARTICIPANTS

BCG Main or Registration Contacts are encouraged to organize multiple attendees to participate at one location or several locations concurrently. In this manner, several attendees can be accommodated in one conference room with a speakerphone. All Briefing connections are included in your BCG Membership.

REGISTRATION

To register, please contact your institution's BCG Main or Registration Contact or, if authorized, log in at <http://register.bankerscompliancegroup.com/subadmin> and select "Register for Events." Registration closes at noon **two business days** prior to the Briefing date. On the day before the Briefing, registrants will receive an email with call-in instructions and single-use PIN.

CD-Rom: Members can also register to receive a CD-Rom package. This package, which includes any Handouts, is mailed to registrants approximately 2-3 weeks after the Briefing.

DOWNLOAD THE HANDOUTS

The Handouts are *generally* posted on the BCG Website by noon on the business day before the Briefing. All registrants will receive an email notification when the Handouts are posted. To download a Handout, go to www.bankerscompliancegroup.com/monthly-telephone-briefing.php and click on the "Download Handout Here" link at the end of each Briefing description.

CANCELLATION

It is not necessary for registrants to contact BCG if they cannot attend a Briefing and need to cancel their registration.

SIGN UP ANNUALLY

Sign up annually for the 2018 BCG Monthly Telephone Briefings! If you like attending the Briefings, but don't want to register every month, you can have your institution's Registration contact sign you up for the entire year.

MISSED THE BRIEFING?

Should you or others at your institution miss the briefing, you can tune into our streaming audio available on the BCG website one week after the Briefing, at www.bankerscompliancegroup.com/listen-while-you-work.php.