OSC
INSURANCE SERVICES

ILLUMINATING RESULTS

COMPLIANCE INSIGHTS

A value-added newsletter for clients and friends of OSC

IN THIS ISSUE

FALL 2019

REVISED INTERAGENCY FLOOD INSURANCE EXAMINATION PROCEDURES

The Task Force on Consumer Compliance of the Federal Financial Institutions Examination Council (FFIEC) adopted revised interagency examination procedures for the Flood Disaster Protection Act (FDPA). The revised procedures reflect amendment to the regulations regarding loans in areas having special flood hazards to implement the private flood insurance provision of the Biggert-Waters Flood Insurance Reform Act of 2012 (Biggert-Waters Act). The amendment was issued by the OCC, FRB, FDIC, Farm Credit Administration, and the NCUA and became effective July 1, 2019.

The FFIEC members developed these procedures to promote consistency in the examination process and communication of supervisory expectations. The interagency procedures reflect regulatory provisions that:

- Require a regulated lending institution to accept private flood insurance policies that meet the statutory definition of "private flood insurance" in satisfaction of the flood insurance purchase requirement;
- Include a compliance aid to facilitate a regulated lending institution's determination that a policy meets the definition of "private flood insurance";
- Permit a regulated lending institution to exercise its discretion to accept a flood insurance policy issued by a private insurer that does not meet the statutory definition of "private flood insurance," subject to restriction; and
- Permit a regulated lending institution to exercise its discretion to accept flood coverage provided by a Mutual Aid Society, subject to certain restrictions.

Federal Reserve Examination Manual Update

https://www.federalreserve.gov/supervisionreg/caletters/CA%2019-10%20Letter%20Attachment%20Interagency%20Flood%20Disaster%20Protection%20Act%20Exam%20Procedures.pdf

Office of the Comptroller of the Currency Manual Update

https://www.occ.gov/publications-and-resources/publications/comptrollers-handbook/files/flood-disaster-protection-act/pub-ch-flood-disaster-protection-act.pdf

Federal Deposit Insurance Corporation Manual Update

https://www.fdic.gov/regulations/compliance/manual/5/v-6.1.pdf

Editor: Kirk Stephens, CRCM and Chief Compliance Officer of OSC/Breckenridge Insurance Group and 20-year veteran of the FDIC. He can be reached at kstephens@breckgrp.com or 678.322.3521.

For more information on OSC or our industry-leading IrisX insurance technology, please contact Michael Randall at mrandall@oscis.com or 803.237.5428.

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SIX BANKING ISSUES TO WATCH IN NEXT SESSION OF CONGRESS

Lawmakers have returned from their summer break on September 9th, and are faced with some unresolved financial services issues. The key financial policy issues to pay attention to are as follows:

Marijuana banking

After Democrats took control of the House over a year ago, banks got their first hearing on a bill aimed at enabling the industry to service marijuana businesses in states where it is legal, without fear of repercussion from regulators.

The House of Representatives passed the SAFE Banking Act, which would prohibit federal regulators to penalize firms

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TRUMP ADMINISTRATION RELEASES GSE REFORM PLAN

The Trump Administration released its long-awaited plan on reforming government-sponsored enterprises, offering nearly 50 recommended legislative and regulatory reforms aimed at limiting the federal government's role in the secondary mortgage market.

The proposal with the input from HUD as well as the Mortgage Banker's Association and other industry advocates, recommends legislative and administrative reforms to define a limited role for the federal government in the housing finance system; further enhance taxpayers protections against future bailouts; and promote competition in the housing finance system.

Key elements of the proposal:

- Government support of the secondary market should be explicitly defined, tailored, paid-for, and the GSEs conservatorship should come to an end.

[CONTINUED ON PAGE 7]

SAVE THE DATE

Our 20th **Client Compliance Training Conference** will be held in the spring of 2020 near our Atlanta-area offices from Tuesday, March 24th - Thursday, March 26th. We'll officially open registrations and hotel blocks in late fall, but we wanted to alert you now to the dates for planning purposes. Other than your travel related expenses, there is no registration fee associated with this educational forum for clients and invited guests of OSC.

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[SIX BANKING ISSUES CONTINUED FROM PAGE 3]

that accept insured deposits from state-approved cannabis businesses, the Republican-controlled Senate has been viewed as an obstacle for cannabis banking. The industry did however get a hearing in the Senate Banking Committee in July and is hopeful that Congress will provide clarity on whether they can service state-approved cannabis businesses.

GSE Reform

The Trump Administration released its long-awaited plan on reforming government-sponsored enterprises, offering nearly 50 recommended legislative and regulatory reforms aimed at limiting the federal government's role in the secondary mortgage market. For more information refer to the separate article contained on page 3 of the Newsletter.

Anti-Money-Laundry Reforms

For years the industry hoped that Congress would update anti-money-laundering laws that banks viewed as outdated.

Financial institutions have pushed for Congress to raise the dollar thresholds for submitting suspicious activity reports and currency transactions reports. They have also asked Congress to require businesses to report their true owners at incorporation, rather than requiring financial firms to provide that information.

There is bipartisan support for requiring businesses to report their beneficial owners; however, there are still concerns among Republicans that the requirement will impose unnecessary burdens on small businesses.

Current Expected Credit Loss (CECL) Delay

Community bankers have been pushing for a halt on the implementation of a new accounting standard for loan losses that they fear will be overly costly.

The Current CECL Loss model, adopted by the Financial Accounting Standards Board (FASB) in 2016, will require financial institutions to estimate losses over the entire life of a loan.

Initially, FASB proposed that publicly traded banks convert to the new model by Jan 1, 2020, followed by privately held institutions and credit unions on Jan 1, 2022. But, in July FASB voted to give smaller lenders until January 2023 to adopt CECL. A proposed House and Senate bill also called for a delay and would require regulators to study the effects of CECL on credit availability for banks of various sizes and U.S. competitiveness.

Flood Insurance Reform

Reforms to the National Flood Insurance Program, which has gone through roughly a dozen short-term reauthorizations since 2017, are another priority for banks.

The industry is encouraged after the House Financial Services Committee unanimously passed a long-term reauthorization

[CONTINUED ON PAGE 8]

MEET THE EDITOR:
KIRK STEPHENS, CRCM

Chief Compliance Officer,
Breckenridge Insurance Group

For over seven years, Chief Compliance Officer of Breckenridge Insurance Group Kirk Stephens spearheaded our industry-leading compliance practices. In this role, he manages the implementation of sound compliance practices and oversees corporate governance best practices. In addition, Kirk provides financial risk management advisory and compliance services to banks and other mortgage lender clients of OSC. Kirk is a 20-year veteran of the Federal Deposit Insurance Corp. (FDIC), where he most recently provided strategic direction and advice on supervisory examinations and oversaw and managed the operations for the Senior Deputy Director of Supervisory Examinations in Washington, D.C. Previously, he was a regional FDIC case manager, directing the risk management examinations of financial institutions with $20M to $140B in assets. He began his career at the FDIC as a federal bank examiner. Kirk regularly contributes to national publications as well as speaks at national conferences on compliance-related issues as well as publishes this well-regarded lender compliance newsletter.

Consumer Financial Protection Bureau

NEW CFPB POLICIES ARE INTENDED TO ENHANCE COMPLIANCE AND INNOVATION EFFORTS

On September 10, the Consumer Financial Protection Board issued three new policies to promote innovation and facilitate compliance: Policy on No-Action Letters (NAL), Policy to Encourage Trial Disclosure Programs (TDP), and Policy on Compliance Assistance Sandbox (CAS). The policies were proposed in 2018 and went through a period of public comment after their proposal.

The CFPB previously issued an NAL Policy in 2016 which allowed for NALs to be issued to provide increase regulatory certainty through a statement that the CFPB would not bring a supervisory or enforcement action under specifically articulated circumstances. The new NAL Policy provides a more streamlined review process to provide innovative products and services that will benefit consumers.

The new TDP Policy give protections for entities to conduct trial disclosure programs and streamlines the application and review process. According the Bureau, under the TDP Policy, "entities seeking to improve consumer disclosure may conduct in-market testing of alternative disclosures for a limited time upon permission by the Bureau."

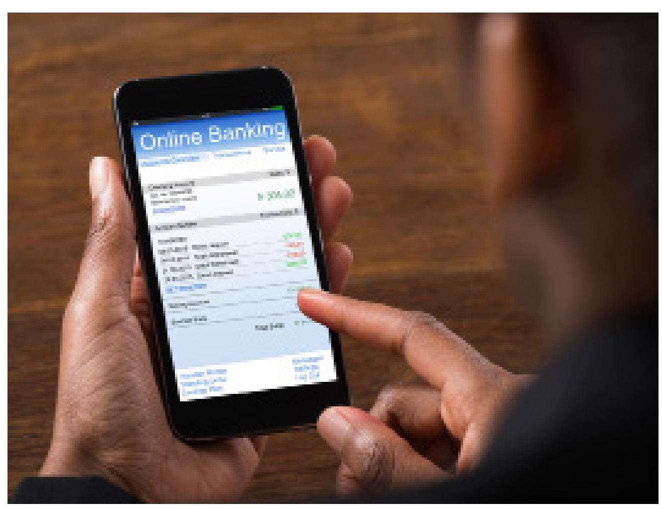
Revised CAS Policy allows testing of a financial product or service when faced with uncertainty. The Policy provides applicants with a "safe harbor" from liability for previously approved conduct during the testing period. Approvals provided under the CAS Policy will shield applicants from liability under the Truth in Lending Act, the Electronic Funds Transfer Act, or the Equal Credit Opportunity Act.

In a statement regarding the new policies, CFPB Director Kathleen Kraninger stated, "Innovation drives competition, which can lower prices and offer consumers more and better products and services. New products and services can expand financial options, especially to unbanked and underbanked household, giving more consumers access to the benefits of the financial system. The three policies we are announcing today are common-sense policies that will foster innovation that ultimately benefits consumers."

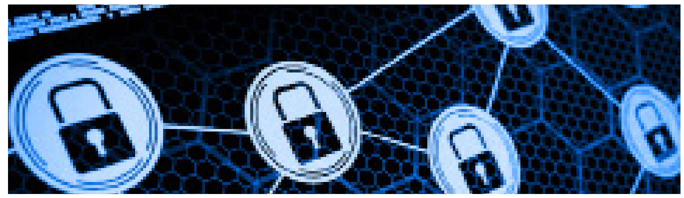
Read the Policy on No-Action Letters
https://www.consumerfinancialserviceslawmonitor.com/wp-content/uploads/sites/501/2019/09/cfpb_final-policy-on-no-action-letters.pdf

Read the Policy to Encourage Trial Disclosure Programs
https://www.consumerfinancialserviceslawmonitor.com/wp-content/uploads/sites/501/2019/09/cfpb_final-policy-to-encourage-tdp.pdf

Read the Policy on the Compliance Assistance Sandbox
https://www.consumerfinancialserviceslawmonitor.com/wp-content/uploads/sites/501/2019/09/cfpb_final-policy-on-cas.pdf



FTC PROPOSED TO ADD DETAILED CYBERSECURITY REQUIREMENTS TO GRAMM-LEACH BLILEY ACT SAFEGUARDS RULE



Earlier this year, the Federal Trade Commission (FTC) published requests for comment on proposed amendments to two key rules under the Gramm-Leach-Bliley Act (GLBA). Most significantly, the FTC is proposing to add more detailed requirements to the Safeguard Rule, which implements and governs the information security programs financial institutions must implement to protect customer data. The definition of "financial institution" includes many businesses that may not normally describe themselves that way. In fact, the Rule applies to all businesses, regardless of size, that are "significantly engaged" in providing financial products or services. These include check-cashing businesses, payday lenders, mortgage brokers, nonbank lenders, personal property or real estate appraisers, professional tax preparers, and courier services.

The Safeguards Rule establishes requirements for the information security programs of all financial institutions subject to FTC jurisdiction. The Rule, which first went into effect in 2003, requires financial institutions to develop, implement, and maintain a comprehensive information security program.

The FTC's proposed revisions would add substantially more detail to these requirements which includes the following:

- Designate an employee or employees to coordinate information security program to require the designation of a single individual referred to as the Chief Information Security Officer (CISO), as responsible for overseeing and implementing the program;
- Conduct risk assessments, including that the assessment must be written, describing how the information security program will address the identified risks, and be performed periodically;
- Implement access controls on information systems, as well as restrict access to physical locations containing customer information only to authorized individuals;
- Requires information systems to include audit trails designed to detect and respond to security events;
- Requires financial institutions to develop procedures for the secure disposal of customer information in any format that is no longer necessary for their business operations or other legitimate business purposes;
- Requires financial institutions to develop procedures for change management;
- Requires financial institutions to implement appropriate training and education, including verifying that key security personnel take steps to maintain current cybersecurity knowledge, and utilize qualified security personnel;
- Expand the requirement to oversee service providers to require financial institutions to periodically assess such service providers based on the information security risk they present;
- Requires that financial institutions establish incident response plans; and
- Requires that the financial institution's CISO report at leas annually to the institution's board of directors on issues related to information security program.

The FTC received 55 comments to the proposed rule, arguably not a tremendous response, which could expedite the finalization of the Rule.

Read the Proposal

https://www.federalregister.gov/documents/2019/04/04/2019-04981/standards-for-safeguarding-customer-information

[TRUMP GSE REFORM PLAN CONTINUED FROM PAGE 3]

- GSEs and their successors should be appropriately capitalized to remain viable after a severe economic downturn to ensure that shareholders as unsecured creditors, rather than taxpayers, will bear any related losses.
- Plan should promote private sector competition in the housing finance system suggesting that elements of the Dodd-Frank Act be dismantled to "level the playing field between GSEs' and private sector." Regulatory frameworks governing the GSEs and other market participants should be harmonized.
- Treasury would continue supporting FHFA's administrative actions (absence of further Congressional action), to enhance the regulation of the GSEs, promote private sector competition, and satisfy the preconditions set forth in the plan for ending the GSEs' conservatorships.
- Existing governing support of each GSE under its Senior Preferred Stock Purchase Agreement with Treasury should be replaced with an explicit, paid-for guarantee backed by the full faith and credit of the Federal Government that is limited to the timely payment of principal and interest on qualifying mortgage-backed securities.
- Guarantors should be supervised and regulated by the FHFA.
- Reformed regulatory framework should not create capital arbitrage or other regulatory incentives that bias mortgage lenders toward securitizing their loans through guarantors.
- GSEs should continue supporting affordable housing for low- and moderate -income, rural, and other similar borrowers.

Read the Proposal

https://home.treasury.gov/system/files/136/Treasury-Housing-Finance-Reform-Plan.pdf

The Mortgage Leader

Kirk Stephens, CRCM and Chief Compliance Officer of Breckenridge/OSC, recently provided his perspective on meeting the NFIP private flood insurance policy standards required by regulators with *The Mortgage Leader* at https://themortgageleader.com/perspectives-on-private-flood-insurance-regs-related-to-nfip-standards/. If you are interested in learning more about the policy assessment services OSC offers, please reach out to your client or sales manager directly. More information on this service can also be found on our website at https://www.oscis.com/compliance/flood-compliance/

OSC INSURANCE SERVICES

FLOOD

PRIVATE POLICY ASSESSMENT

Analyzing private flood policies is no picnic

With the Biggert-Waters Flood Insurance Reform Act of 2012, private flood insurance is accepted if it equates to the National Flood Insurance Policy coverage standards. However, this acceptance requires lenders to evaluate these policies for compliance with the statutory definition of "private flood insurance" and to ensure they meet minimum requirements. It's no picnic to get it wrong, and regulators can criticize you for accepting non-compliant policies. This burden for many is great as resources may be understandably limited.

Let OSC help you evaluate your private flood policies

At OSC, we help clients understand and apply the evolving private flood policy rules to their portfolios to mitigate risk. Our experienced compliance officer and team actively monitor a range of regulatory sources–including the FHA, OCC, FDIC, CFPB, FNMA, FHLMC, NFIP, and GNMA–to provide sound guidance on your private flood policies. We are equipped to handle your policy audit and deliver actionable insights to your team in a timely manner

We will work closely with your loan operations and/or compliance team to:

- Access each private flood policy in a secure, electronic manner
- Generate a tracking ticket to process the policies efficiently
- Review policies against all key private flood guidelines
- Provide an actionable assessment of risk for the policy

Assessment criteria included but not limited to:

- Assessment against the statutory definition of "Private Flood Insurance"
- Discretional acceptance criteria outlined in the Agencies' Final Rules
- Licensure of the insurance carrier
- Breadth of coverage
- Cancellation/non-renewal notice requirements
- Strength of the mortgage interest clause
- Legal recourse
- Safety and soundness elements

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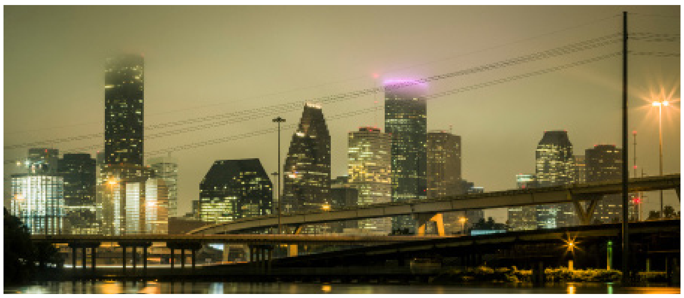

[SIX BANKING ISSUES CONTINUED FROM PAGE 4]

in June affirming the program for five years, requiring disclosure of property-specific risks for homeowners and buyers, updating maps to creating new flood zones, and enabling individuals with non-NFIP policies to return to the program without penalty.

Yet, it's currently unclear whether that bill would garner enough support in the Senate, where several members from flood-prone states are concerned that it will hinder sustainability and affordability for homeowners.

Data Security

Passing legislation to better safeguard consumers' personal data and develop cybersecurity standards has also confounded Congress, and few expect Congress to move the needle anytime soon.

At the end of July, Capital One announced that personal data was compromised for over 100 million credit card applicants. Meanwhile, Facebook's June announcement about the proposed creation of the Libra cryptocurrency brought heightened criticism from lawmakers and others about the social media giant's track record in protecting users' privacy.

It still remains to be seen if frequently breaking news about data breaches and new innovations will compel lawmakers to make cybersecurity reforms a priority.

BANK EARNINGS GROW 4.1% YEAR-ON-YEAR

FDIC-insured banks and savings institutions earned $62.6 billion in the second quarter, a 4.1% increase from the industry's earnings a year before, the FDIC said.

Community banks earned $6.8 billion during the second quarter, up 8.1% from the same period last year. Their increase in net interest income also outpaced the overall industry page at 5.1%, as did their loan growth rate. Community banks' loan and lease balance rose by 6.3% year-over-year, compared to 4.5% for all banks.

The agency attributed the profit growth to gains in realized securities and a 3.7% rise in net interest income, although the year-over-year increase in net interest income was the slowest since 2015. Meanwhile, noninterest income declined by 2.7% from the previous year – driven primarily by falling fees for servicing and investment banking at larger banks. Community bank noninterest income rose 4.7%. Noninterest expense rose across the industry, driven by higher salaries and benefits. The average return on assets rose by a single basis point to 1.38%, and average net interest margin also rose by one basis point to 3.39%.

Net charge-offs rose 9.3% from a year ago, a faster pace than the previous quarter, while the number of loans that were 90 or more days past due declined by 4.8% from the first quarter. The number of institutions on the problem bank list fell to 56.

Read the Quarterly Banking Profile

https://www.fdic.gov/bank/analytical/qbp/2019jun/qbp.pdf?utm_campaign=Newsbytes-20190906&utm_medium=email&utm_source=Eloqua

NEW YORK PASSES STOP HACKS AND IMPROVE ELECTRONIC DATA SECURITY (SHIELD) ACT

On July 25, 2019, New York Governor Cuomo signed into law the SHIELD Act that amends New York's current data breach notification law, which covers breaches of certain personally-identifiable computerized data (referred to in the New York breach law as "Private Information"). The Act also breaks new ground by imposing substantive data security requirements on businesses that own or lease the Private Information of New York residents, regardless of whether the businesses otherwise conduct business in New York State. Both portions of the Act are backed by potential civil penalties for noncompliance.

Among other provisions, the SHIELD Act would:

- Expand the scope of information subject tot data breach notification law to include biometric information (e.g., fingerprints) and email address/password combinations that provide account access, including security questions and answers;
- Broaden the definition of "data breach" to include unauthorized "access" to private information, which includes viewing, copying, or downloading private information;
- Update the data breach notification requirements to any person or entity with the private information of a New York resident;

- Imposes "reasonable" security requirements on persons and businesses that collect private information of a New York state resident, including the development, implementation, and maintenance of reasonable administrative, technical and physical safeguards to protect the security, confidentiality, and integrity of the private information;
- Expands the time period from two to three years in which the New York attorney general may bring action against a business for SHIELD Act violations.

Read the Act

https://www.jdsupra.com/legalnews/new-york-enacts-shield-act-adding-data-48859/

ILLINOIS REQUIRES COMPANIES TO REPORT DATA BREACHES TO ATTORNEY GENERAL

On August 9, Illinois Governor signed SB 1624, which requires that a single data breach involving the personal information of more than 500 Illinois resident must be reported to the State Attorney General. The notice must include: (i) a description of the nature of the breach of security or unauthorized acquisition or use; (ii) the number of Illinois resident affected by such incident at time of notification; and (iii) any steps the data collector has taken or plans to take relating to the incident. Notification is required to be made "in the most expedient time possible and without unreasonable delay." But not later than when the data collector informs consumers of the breach under current law. The bill is effective on January 1, 2020.

OSC HAS IMPLEMENTED IP FILTERING TO ENHANCE INFORMATION SECURITY CONTROLS

OSC reminds lending clients of its expanded controls of IP filtering, which validates an active user's credentials by identifying the IP address used as matching against a client's approved IP addresses. This additional control provides added protection and restricts access to OSC client's data from random IP addresses that have not been approved by OSC's lending client. Lenders that have not taken advantage of this additional control should contact their OSC Client Services Manager for more information.

WELCOME TO THE OSC COMPLIANCE TEAM BRANDIE FOREMAN!

We're pleased to announce that we've expanded our compliance team with the recent addition of Brandie Foreman as Compliance Manager. Brandie manages Quality Control and Quality Assurance for OSC business operations in context of applicable federal and state regulations. She will oversee these Atlanta-area based teams and reports to Kirk Stephens, CRCM and Chief Compliance Officer of Breckenridge/OSC. Prior to OSC, Brandie served in various compliance roles including compliance underwriter, compliance auditor, mortgage service manager, and loss mitigation underwriter. She holds a Bachelor's degree in Communications with a minor in Finance from Jacksonville State University. She is looking forward to working with all of our clients and partners. Brandie may be reached at bforeman@oscis.com or 678-460-3261.

NEWS BRIEFS

CFPB Update Automobile Finance Section of the Supervision and Examination Manual

On August 28, the CFPB updated its examination procedures for automobile finance in its Supervision and Examination Manual. The procedures are comprised of seven modules and each examination will cover one or more modules. Prior to using the procedures, examiners will complete a risk assessment and examination scope memorandum, which will assist in determining which of the seven modules the exam will cover: (i) company business model; (ii) advertising and marketing; (iii) application and origination; (iv) payment processing and account maintenance; (v) collections, debt restructuring, repossession, and accounts in bankruptcy; (vi) credit reporting, information sharing, and privacy; and (vii) examiner conclusions and wrap-up.

Automobile Finance Examination Procedures
https://www.consumerfinance.gov/policy-compliance/guidance/supervision-examinations/automobile-finance-examination-procedures/

CFPB Summer Supervisory Highlights

The CFPB has published Issue 19 (Summer 2019) of its Supervisory Highlights, featuring findings in the areas of automobile loan origination, credit card account management, debt collection, furnishing of information to credit reporting companies, and mortgage origination identified in examinations that were generally completed between December 2018 and March 2019. More specifically, the report cites:

Automobile loan origination: Abusive acts or practices when selling add-on GAP products, such as selling such a product to consumers whose low loan-to-value meant they would not benefit from the product.

Credit card account management:

- Failures to clearly and conspicuously provide disclosures required by triggering terms in online ads;
- offsets against consumers' deposit funds without sufficient documentation of the consumers' sufficient awareness of and intent to grant a security interest in those funds;
- deceptive threats of repossession or foreclosure in credit card collections; and
- deceptive marketing of secured credit card accounts.

Debt collection: False representation of the amount and legal status of debt.

Furnishing credit information:

- Failure to conduct an investigation or respond to a credit reporting company (CRC) after receipt of a dispute from the company;
- Failure to report to all applicable CRCs updates or corrections to information found to be incomplete following a dispute investigation;
- Failures to promptly send corrections or updates to all applicable CRCs after determining that previously furnished information about certain accounts was no longer accurate;
- Failures of one or more furnishers of deposit account information to furnish updated information regard accounts that were paid in full or settled in full;
- Failures by one or more furnishers of deposit account information to notify a nationwide specialty CRC that the information was disputed by consumers;
- Failures to implement reasonable written policies and procedures regarding the accuracy and integrity of deposit account information it furnished to nationwide specialty CRCs.

Mortgage origination: Inaccurate APR and Total Annual Loan Cost (TALC) disclosures in reverse mortgages.

Read the Report
https://files.consumerfinance.gov/f/documents/cfpb_supervisory-highlights_issue-19_092019.pdf

Fannie Mae Names Former FDIC Chair and Banking and Financial Services Expert Sheila C. Bair to the Board of Directors

On August 21, 2019, Fannie Mae announced that Sheila C. Bair has been appointed to the Board of Directors. Ms. Bair served as the Chair of the Federal Deposit Insurance

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[NEWS BRIEFS CONTINUED FROM PAGE 11]

Corporation (FDIC), Assistant Secretary for Financial Institutions at the U.S. Department of the Treasury, Senior Vice President for Government Relations of the New York Stock Exchange, and Commissioner of the Commodity Futures Trading Commission.

"We are extremely pleased to welcome Sheila to the Fannie Mae Board of Directors," said Jonathan Plutzik, Chair of the Board. "Her vast experience and proven leadership in some of the world's most prominent financial, regulatory, and private sector organizations will provide unique and valuable insights to Fannie Mae. We are fortunate for the opportunity to work with her."

News Release
https://www.fanniemae.com/portal/media/corporate-news/2019/board-of-directors-bair-6914.html

IN CASE YOU MISSED IT: RECENT OPERATIONS TEAM NEWS

Focus on Fine Tuning

As we announced earlier this summer, OSC and industry veteran Rick Case was promoted to head up Operations with his diverse client service and operations expertise. His immediate focus has been on identifying areas we can enhance service delivery and support growth. In his new role, he has already added new talent and elevated existing team members as you'll read below. We're pleased to share the following operations team changes.

Congratulations to Joe Rodriguez

Joe has been promoted to Director of Operations from Senior Manager of Quality Control and Vendor Relations. His knowledge of systems, regulations, audits and client expectations will serve him well as he works closely with Rick and the team to dedicate his time to escrow processes, quality control, training and overall reporting functions. His prior roles at OSC also included overseeing data capture, customer service and mailroom functions. Joe has 30 years of experience in the industry and prior to OSC he was Branch Manager for Washington Mutual Bank; an Associate Vice President, Operations and Technology Business Head for Citicorp in their trading settlements unit for offshore lending services; and a Computer Specialist Manager III working at SunTrust Bank on their loan origination system.

Welcome to Vicki Nowak and Jim Zeunik

Please welcome Vicki Nowak to OSC as Senior Manager of Loss Draft Services. Vicki has been working closely with OSC and some of our clients as part of the coordinated delivery of loss draft services with our strategic partners at Mueller Reports. As Mueller's Director of Loss Drafts, she oversaw claims processes, monitoring and client communications. She will now be working as part of the OSC team to more seamlessly deliver these same services as part of a turnkey customer excellence experience. Vicki's knowledge of–and continued collaboration with–Mueller inspection professionals nationwide allows for the best of both worlds. Prior to Mueller, she was at Nationstar Mortgage and was responsible for insurance, loss draft, and flood vendors. If you are interested in learning more about our Loss Draft capabilities, please contact your client services manager or Michael Randall at mrandall@oscis.com.

Earlier this summer, Jim Zeunik joined OSC to head up our call center operations and more as Call Center Manager. Jim recently served as Senior Director of Customer Care at XPO Logistics and has significant experience and a proven track record in managing call centers. He now oversees the inbound call center team and is focused on workflow optimization best practices to boost performance leveraging our significant technology capabilities. Jim is reporting to Rick and is looking forward to getting to know our clients and providing leadership in servicing their customers.