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Quarterly Report

Mississippi Regulatory Compliance Group

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YOU NEED A WRITTEN COMPLIANCE PROGRAM

One of the most common criticisms from regulators in recent compliance examinations has been a bank's lack of a written Compliance Program. One of the most common requirements in recent regulatory enforcement actions has been the development and submission of such a written program. The past seven year period of turmoil in banking brought about the advent of a greatly increased regulatory scrutiny for banks. During this time, the FDIC, the OCC, the Federal Reserve and the CFPB have each changed their view of how financial institutions should approach the subject of regulatory compliance, especially for consumer protection laws and regulations.

The risks to banks that the regulators are concerned about have not changed. Regulators still believe that poor compliance practices increase a bank's reputational risk, legal risk, and compliance risk. What has changed is the regulators' focus on what to do about these risks.

In the past, examiners reviewed files and examined the bank's policies and procedures for each of the regulations that make up the framework of compliance. If files were complete and accurate and policies and procedures were in place for each law and regulation, the chances were very good that a bank would have a favorable compliance exam.

THE COMPLIANCE MANAGEMENT SYSTEM.

Today, however, the regulatory mindset has changed. Regulators, too, are overwhelmed by the pace and complexity of regulatory developments, particularly in the consumer protection arena. They no longer believe that a disjointed series of more or less stand-alone policies and procedures can produce a sound program of compliance. Instead, they are examining the process that banks employ to create a unified, cohesive culture of compliance, one that approaches compliance as a holistic set of principles that crosses department lines, organizational structure, all products and services offered, and provides training for the staff and management of the bank. Examiners sometimes refer to this as a bank's Compliance Management System (CMS), a topic we have talked about before.

You Need a Written Compliance Program... 1
CFPB Amends 2014 Mortgage Rules 4
Proposed Changes to TILA-RESPA Integrated Disclosure.............................. 5
Integrated TILA-RESPA Disclosures-Compliance Guides and Materials Available.. 6
A New Tool for Fair Lending Examinations... 6
A Shortcut to Privacy Disclosure 7
BSA Regulatory Expectations...................... 8
MSRCG Meeting – November 18, 2014.... 10
MRCG Meeting -November 20, 2014....... 10
MRCG-MSRCG Compliance Calendar 11

Examiners now want to understand how a bank approaches the broad subject of compliance. How do you learn about the numerous changes and developments in compliance? Is there a central authority over the compliance function at your bank and does that person (or persons) have the necessary authority, training and resources to manage the Compliance Program across departmental lines?

REGULATORY EXPECTATIONS.

Examiners also believe that a bank's Compliance Program cannot function properly if Senior Management and the Board of Directors are not fully engaged in the compliance process. So, as a result, they now begin their examination of a bank's Compliance Program by inquiring at the top.

The regulators' clear expectation of the Board of Directors is that the Board will have in place three basic elements.

- Strong oversight of the compliance function by the Board and Management;

- The development and implementation of a strong and efficient Compliance Program; and

- The development of a thorough compliance audit function.

THE WRITTEN COMPLIANCE PROGRAM.

Combine these three elements with a clear process for tracking regulatory developments, a full set of accurate and complete policies and procedures, and a strong program for training all affected staff, and you will be well on your way to convincing examiners that your bank has a strong Compliance Management System. But that only starts the process. Examiners now want to see a <u>written</u> Compliance Program.

Of course, this requirement is imposed most often in the context of a Formal Agreement, Consent Order, MOU or some other less formal enforcement action. And perhaps the best way to head off one of these actions is to plan in advance to develop your own voluntary written Compliance Program without waiting for the regulators to ask.

THE ELEMENTS.

The written Compliance Program should be viewed as a complement to the bank's Compliance Management System. The CMS basically establishes how the bank, through its Management and Board of Directors, implements a culture of compliance where a top-down approach supports the compliance function. The written Compliance Program can be viewed as a blueprint for how compliance works at your bank. The following are the most important elements of a written Compliance Program.

- <u>Compliance Risk Assessment</u>. The Compliance Officer is usually the driving force behind the written Compliance Program. Having been appointed and sufficiently empowered by Management and the Board of Directors, the Compliance Officer should be charged with developing a Compliance Program that is suitable to the bank based on its size, product offerings, office locations, staffing, etc. (The Compliance Risk Assessment furnished to those banks taking part in the CMS Initiative should be a help here.)

- <u>Monitoring for Compliance</u>. Next, the written Compliance Program should provide for a written explanation of the methods that the Compliance Officer and support staff will use to perform an internal audit of loan transactions, products and services, etc. for compliance with all laws and regulations. Particular emphasis should be placed upon consumer

protection laws and regulations. For a smaller bank, this monitoring process could be as simple as a review of all loan transactions for compliance and a sampling of deposit account and other product offerings. A larger bank may need to develop a sound sampling technique designed to detect any recurring errors or other problems. Note: This internal audit function is in addition to any independent, third-party testing that may need to take place. Recent experience tells us that internal monitoring may be something of a weak link for banks of all sizes.

- Policies and Procedures. In the past, a bank's Compliance Policy Manual was the document you would turn to when asked about your bank's compliance plan or program. Regulatory guidance still emphasizes the need for thorough, up-to-date policies and procedures; however, today the focus increasingly is upon the manner in which your Compliance Policy is updated for new developments and changes and then upon how those developments and changes are communicated to Management, the Board of Directors and throughout the bank's affected staff. What would otherwise be a difficult task to tackle should become easier as a result of membership in the MRCG or MSRCG. The combination of newsletters, Quarterly Meetings and regular updates to the Compliance Manual that every member receives should go a long way towards satisfying the regulators that you have this part covered. Don't forget to include the Executive Summary of the Newsletter that is provided to Management and to the Board. Many examiners are already familiar with this service. Be sure to make it a part of your written Compliance Program.

- Consumer Complaints. When the CFPB started tracking consumer complaints in 2012, that caught the attention of the bank regulators. Now the regulators are asking to see policies for tracking consumer complaints of all types and evidence of how those complaints are resolved. Increasingly, this complaint tracking/resolution process is becoming part of a bank's written Compliance Program. Your plan should spell out those processes and be comprehensive enough to serve as an early warning system if repetitious complaints are received.

- Training. Training has always been a requirement that the regulators have stressed. Your written Compliance Program should detail how training will be conducted for new legislation, regulations or developments and how and when it will be conducted (annually, as needed, based on a planned schedule, etc.). Copies of training materials should be kept as a part of the written Compliance Program, along with a record of employee, Management and Board of Directors attendance.

- Independent Review. For a number of years now, the regulators have required a certain amount of independent testing for certain compliance functions, think BSA. As the regulators' jobs have become more time consuming and complex, they have welcomed, and in the case of enforcement actions required, independent testing of more and more facets of compliance. Independent testing does not have to be conducted by an outside third-party, although third-party testing is often more efficient than having someone at the bank who is not involved in compliance do the testing in order to be independent. Either way, a benefit of independent testing can be that the regulators accept the work papers and results of such testing and cut short what would otherwise be an extended and expensive Compliance

Examination. Of course, that presumes that the independent testing results are good. However, if the independent testing reveals a problem, then you would have time to take corrective action thereby lessening or perhaps alleviating what would otherwise be an examination problem. Independent testing and how it will be employed should be a part of your written Compliance Program.

CONCLUSION.

In conclusion, then, none of this is new. Your bank probably has many if not all of these features in place. But ask yourself whether you have reduced this to writing. Whether Management understands and has signed on, and, finally, whether the Board of Directors supports each of the elements of your written Compliance Program. If all of that is true, then you have a concise document that can be used to explain to regulators how compliance works at your bank.

For those taking part in the CMS Initiative, we are drafting a generic written Compliance Program that can be used as a starting point for developing your own written statement. That generic Compliance Program should be posted in time for the November 2014 meeting.

(Ed Wilmesherr)

CFPB AMENDS 2014 MORTGAGE RULES

On October 22, 2014, the CFPB issued a final rule amending the Dodd-Frank mortgage rules that became effective January 10, 2014. The amendments include a points and fees cure under the ATR/QM rule, a modest expansion of the ATR exemption for certain non-profits and a slight expansion of the small servicer exemption for certain non-profit lenders/services.

Under the ATR/QM rule the total points and fees charged to a consumer generally may not exceed 3% of the loan amount in order for the loan to be considered a QM. Higher thresholds which vary with the loan amount apply to loan amounts less than $100,000. Under the amendment, a lender or secondary market lender who learns after loan closing that the points and fees cap was exceeded can retain QM status for the loan if it refunds the excess amount to the consumer with interest at the loan contract rate. The refund must be made within 210 days after consummation of the loan and the ability to cure is cut off if the refund is not made before the consumer files a legal action, gives written notice of the overage to the creditor or servicer, or becomes 60 days or more past due. The right to cure will sunset on January 10, 2021, and the right to cure is only available for loans originated after the effective date of the rule and before the sunset date.

The amendments expand the exemption from the ATR/QM rule for certain non-profits. 501(c)(3) non-profit organizations lending to low and moderate income consumers are exempt from the ATR/QM rule if they make no more than 200 dwelling secured loans a year and meet certain other restrictions. The Bureau's amendment excludes certain subordinate lien loans from the 200 loan limit. Some non-profits extend no interest subordinate lien loans for things like downpayment assistance, foreclosure avoidance, energy efficiency assistance and home rehabilitation where repayment is contingent or forgivable, a so-called "soft second" mortgage loan. The Bureau was concerned that the 200 loan limit may cause some non-profits to curtail their lending in this area. In order to be excluded, a transaction must be secured by a subordinate lien; made for the purpose of homebuyer assistance (such as downpayment or closing cost assistance, principal and interest subsidy, rehab or energy efficiency assistance, or

foreclosure prevention); be interest free; and provide for forgiveness of principal (either incrementally over time or in whole at some point in time) or deferment of principal repayment for at least 20 years or until the property is sold or no longer serves as the consumer's principal dwelling; and the total costs to the consumer are less than 1% of the loan amount with no charges other than recording fees and a reasonable fee for the application and/or housing counseling services.

The amendments also include a modest expansion of the small servicer exemption under the mortgage servicing rules in Regulations Z and X for non-profit entities that service loans for a fee for other non-profit lenders as part of a common network or group of non-profit entities. Under the existing rule, a small servicer is one that, together with any affiliates, services 5,000 or fewer loans for which the servicer and its affiliates are either the creditor or assignee, excluding any loans that are voluntarily serviced for a non-affiliate for no compensation. Some non-profits service loans for a fee for other non-profits as part of a larger network, but the entities are not affiliates. The amendment expands the exemption to cover a non-profit servicing loans originated by an associated non-profit entity using a common name, trademark or tradename and supporting a common charitable mission or purpose.

The amendments will become effective immediately upon publication in the Federal Register.

(Cliff Harrison)

PROPOSED CHANGES TO TILA-RESPA INTEGRATED DISCLOSURE

In October, the CFPB proposed two changes to the TILA-RESPA Integrated Disclosure Final Rule which was issued last November and becomes effective August 15, 2015. The proposed changes include: (1) an adjustment to the timing requirement for giving revised disclosures when the consumer locks the interest rate after the initial loan estimate disclosures have been given, (2) an amendment allowing language relating to new construction loans to be included on the loan estimate form, (3) an amendment to provide for placement of the NMLSR ID number on the integrated disclosures, and (4) several technical corrections and wording changes.

Under the integrated disclosure rule, a creditor must provide a revised loan estimate disclosure re-disclosing interest rate dependent charges and loan terms on the date that the interest rate is locked. The Bureau is proposing to allow creditors until the next business day after the rate lock occurs to provide the re-disclosure, rather than requiring it be provided on the same say as the rate lock. The Bureau is concerned that the same day re-disclosure requirement may cause creditors to impose cut off times or limits on a consumer's ability to lock rates at a time of the consumer's choosing. The Bureau is seeking comment on whether one business day is sufficient for creditors to provide the re-disclosure and whether consumer harm would result if the Bureau were to allow more than one business day for the re-disclosure.

Second, the Bureau is proposing to amend the rule to provide for the placement of language on the loan estimate form for new construction loans that is required in order for creditors to redisclose estimated charges. On new construction loans when settlement is expected to occur more than 60 days after the initial loan estimate is given, the creditor may give a revised disclosure if the original disclosure states the creditor may issue revised disclosures at any time prior to 60 days before consummation. As originally issued, the integrated disclosure rule did not

permit that statement to be included on the form. The proposed change would correct that and allow the statement to be included.

The proposal would also amend the Reg. Z section which lists the specific documents that must contain the loan originator's name and NMSLR ID to include both the initial loan estimate and loan closing disclosures. Technical corrections include various non-substantive changes to sections of the commentary to clarify the intent of those sections.

Comments are due by November 10, 2014.

(Cliff Harrison)

INTEGRATED TILA-RESPA DISCLOSURES – COMPLIANCE GUIDES AND MATERIALS AVAILABLE

The CFPB's integrated TILA-RESPA disclosure rules issued last November go into effect August 15, 2015. In past meetings, we have reviewed the basics of the new disclosures, and we plan to focus on the changes in greater detail in February. Meanwhile, it may be helpful to look over the various guides and materials the CFPB has made available. The instructions for completing the new disclosure forms are detailed and technical and likely will require some study in order to become familiar with the requirements.

The CFPB has published a Compliance Guide which is written in a plain English Q & A format. The guide covers the basics of the rule and requirements for use of the new disclosure forms.

The CFPB has also published a Guide to Completing TILA-RESPA Integrated Disclosure Forms as a companion to the Compliance Guide. The Guide to Forms summarizes the instructions for completing the Loan Estimate and Closing Disclosures on a section-by-section basis for each form. In addition, the Bureau has provided sample completed disclosures for different loan types.

In addition to the printed materials, the Bureau has presented a series of three 60 to 90 minute webinars covering an overview of the rule, frequently asked questions and the loan estimate form. A similar program is planned to go over the loan disclosure form. The webinars have been recorded and the recordings and the webinar materials have been made available by the CFPB for downloading.

The guides, sample forms and recorded webinars and materials are available on the CFPB website under the tab "Law and Regulation" under the sub-heading "Regulatory Implementation" or you can type the following address into your web browser to access the web page:

www.consumerfinance.gov/regulatory-implementation/tila-respa/

(Cliff Harrison)

A NEW TOOL FOR FAIR LENDING EXAMINATIONS

For some period of time now (it is unclear just how long), the CFPB has been using a proxy method, which combines geography and surname-based information into a simple tool that is used to determine a borrower's or an applicant's race and ethnicity for loan transactions where that demographic information would not appear in a bank's loan files (e.g., automobile loans).

The Equal Credit Opportunity Act ("ECOA") and Regulation B prohibit, with few exceptions, inquiries about race, color,

religion, national origin or sex of an applicant. That information is often needed, however, in the context of a Fair Lending analysis to identify potential discrimination. The CFPB has validated a proxy process that can approximate this data to a high degree of accuracy.

To come up with the proxy, the CFPB constructs a probability that assigns race and ethnicity based on demographic information associated with a borrower's or applicant's surname and then updates that probability using demographic characteristics of the census block group associated with the borrower's or applicant's place of residence. The technique is called the Bayesian Improved Surname Geocoding method, or BISG.

Our resident expert on statistical analysis, Brandon Roberts, tells us that this proxy process is surprisingly accurate. So much so that it may be difficult to disprove the results that such a proxy process might produce. This makes it all the more likely that examiners will resort to this type of data analysis. And expanded HMDA and small business loan data reporting requirements will only make it more likely that examiners will resort to statistical analysis of your loan data when doing Fair Lending reviews. That makes it all the more important that you know well in advance of a Fair Lending exam just what your data has to say. Statistical analysis of loan data is rapidly becoming a fact of life for banks of all sizes.

(Ed Wilmesherr)

A SHORTCUT TO PRIVACY DISCLOSURE

The CFPB has finalized a rule it proposed in May, 2014 that is aimed at simplifying privacy disclosures for those banks that qualify.

Everyone knows that the Gramm-Leach-Blily Act ("GLBA") for some time now has required banks to provide privacy notices to their customers, describing whether and how the bank shares nonpublic, personal information of its customers. Those banks that share information with nonaffiliated third parties must notify customers of that fact and provide them with a method to opt out of such sharing.

Under this new final rule, a bank that does not share information in a manner that triggers opt out rights can now post privacy notices online instead of mailing paper forms. Banks that choose to go this route will have to use the model disclosure form provided in the final rule.

To qualify for online posting, a bank will have to inform customers annually about the availability of disclosures by request. The notice can appear as part of the regular communication with the customer, such as a line on a monthly statement. The notice would inform the customer of the availability of the disclosure online, and in paper form upon request to a designated telephone number.

If a bank does not choose to go this route, then it must continue the earlier practice of sending paper notices.

The CFPB lists several benefits of its new rule:

- Constant Access. The new online disclosures would be continually available and not merely an annual event.

- Limited Data Sharing. The CFPB believes the cost savings and convenience of online disclosure will cost banks to share less data with third parties. (Question: Is it clear that this is a good thing?)

- Consumer Education. Use of the model form, the CFPB believes, will help consumers to better understand a bank's privacy policy.

- Cost Savings. The CFPB estimates that the industry will save approximately $17 million through the use of online disclosure.

The final rule becomes effective when it is published in the Federal Register, which should be almost immediately. You should examine your current practice for providing privacy notices to see if this new development is one you want to begin using.

(Ed Wilmesherr)

BSA REGULATORY EXPECTATIONS

So has your Bank had a Bank Secrecy Act exam lately? If the answer is "yes," did you notice anything different about it? This year it seems that there has been a significant increase in the level of regulatory examinations devoted to Bank Secrecy Act compliance. The agencies have said that because of the recent emphasis on new laws and regulations, such as the ability-to-repay, qualified mortgage rules, mortgage servicing rules, etc, banks have become lax in compliance with other regulations, including the Bank Secrecy Act. Have you?

So what do banks need to do? One thing that banks do not need to do is reduce the emphasis on BSA compliance, including reducing BSA staffing and monitoring. Let's take a brief walk-through of the requirements.

In order to have an effective BSA/AML compliance program, banks must meet the following four minimum requirements:

- A system of internal controls;
- Have a designated, qualified Bank Secrecy Officer, as well as individuals responsible for BSA compliance;
- Training for appropriate personnel; and
- Independent testing for compliance with the BSA.

System of Internal Controls: What are you doing to ensure that your bank has an effective system of internal controls? It starts with the bank's BSA policy. A bank's BSA policy should be comprehensive and include all requirements of BSA/AML and the bank's procedures for complying with these requirements. Remember that as a Bank Group member, the compliance manual has a policy template you can use as the basis for your policy, with bold and bracketed items for a bank to insert its own procedures. It is also important to watch for updates to this policy (and other manual changes) made available by Butler Snow through the FirmEx system and implement the changes immediately.

In addition, banks are required to prepare detailed BSA and OFAC risk assessments. Templates are included in the bank group's Compliance Manual. The risk assessments should be in narrative form and detail at least each item in the template. The risk assessments are required to be approved by the Board on a least an annual basis. If changes occur in the interim, such as the addition of a new branch, new products, etc, then the risk assessment should be updated and again presented to the Board. Banks should also be risk rating your customers, including additional due diligence on commercial customers to determine the type of activity they are engaging in.

Of course, the usual and most obvious two requirements are completion and filing of currency transaction and suspicious activity reports. Do you have procedures in place to capture all transactions or multiples of transactions in excess of $10,000 in cash and to file CTRs in a timely manner? Are those procedures actually being followed? What about identifying suspicious activity? There are a number of items that should be monitored regularly for potential suspicious activity, including cash reports, the occupation on CTRs to determine that cash activity matches occupation, monetary instruments records, wire activity, loans, cash intensive businesses, privately-owned ATMs, CIP information, kiting reports, as well as others. Employees should be reviewing driver's licenses to determine if they are valid (There was a report on the news this week where police arrested several individuals that were caught with about 70 false driver's licenses. Yes, this does happen!) Employees should be looking at passports if a person does not have a driver's license, including verifying the VISA section for non-permanent residents, to determine if the VISA is still valid. Wire activity should be reviewed to determine if it is normal for the customer or the customer's business. What are the bank's procedures for CIP on consumers, commercial customers, elderly, and minors? Money services businesses require additional monitoring, Federal registration and possibly a state license, and a BSA Policy that includes identifying a BSA Officer. For MSBs, you should be determining the expected types and levels of activities being performed (check cashing, selling money orders, money transmitting, selling prepaid cards, having an on-site ATM) in order to be able to identify unusual or suspicious activity. If a bank exempts from CTR filing an MSB or any business that offers ineligible activities for exemptions, the bank must have sufficient documentation in file to establish that no more than 50% of gross revenues come from financial services or other ineligible activities. And these internal controls can go on and on!!!

Designating a qualified Bank Secrecy Officer as well as individuals responsible for BSA compliance: Have you provided your BSA Officer the training and tools needed to do their job? Does the BSA Officer have the authority to cross all department lines and areas of the bank? Does the BSA Officer provide reports to the Board of Directors or a board committee? The BSA Officer should have the technical expertise, management skills, and confidence and conviction to do their job. This cannot occur without the support of management. It is amazing, though, how many BSA Officers never even attend a board meeting or have discussions with senior management! So is the bank really serious about BSA compliance? Think about it.

Training: Many banks utilize on-line training for BSA compliance. While there is nothing wrong with this, it is also necessary to have some classroom training to ensure that ALL employees know the specific policies and procedures of the bank. Several of our banks have also had employees sign a training commitment statement that they understand the importance of BSA compliance and that they recognize they will be held accountable for BSA in their job and annual performance evaluation. Good idea!

Independent Testing: The regulatory agencies' and FinCEN's interagency requirements for independent testing are very detailed. Whether a bank performs their independent testing internally or through an outside consultant, each factor in the agency procedures should be covered. Sufficient transaction testing is of the utmost importance. The whole point of independent testing is to make sure that internal controls are working! Examiners have recently stated that independent testing is the most important

BSA issue because it will determine the scope of their examination and how in-depth examiners will go.

So here's the bottom line. Don't sacrifice the bank's BSA program in order to save a few pennies. The old adage "pay now or pay later" is very real. As a BSA Officer, member of senior management, or a board member, you should be evaluating your program and determining if your bank has allocated sufficient resources to BSA compliance. Have you reached the size where an automated system is needed? Is staffing adequate or is additional staffing needed? Do you have good internal controls, an effective BSA Officer, adequate training, and good independent testing? The time is NOW to ensure that your program is working. Don't get caught with your "BSA Program down!"

(Patsy Parkin)

MSRCG MEETING TO BE HELD ON NOVEMBER 18, 2014

The MSRCG will hold its November Meeting on November 18, 2014, at The Racquet Club of Memphis in the Large Ballroom located at 5111 Sanderlin Avenue, Memphis, Tennessee. Registration will begin at 9:00 a.m. with the meeting to begin at 9:30 a.m.

During the November Annual Meeting we will have representatives from the FDIC and the Federal Reserve who will share their regulatory agencies' perspective on a number of important topics, as well as issues facing all of us in 2015. Among the topics they will cover are BSA, HMDA reporting, CRA and Fair Lending. There will also be a short business meeting immediately following lunch.

As always, the dress code for this occasion is casual, and lunch will be provided. We ask that you fax or e-mail your registration to Liz Crabtree no later than Thursday, November 13, 2014, so that arrangements for lunch can be finalized. We look forward to seeing you there.

(Ed Wilmesherr)

MRCG MEETING TO BE HELD ON NOVEMBER 20, 2014

The MRCG will hold its November Meeting on November 20, 2014, at the Mississippi Sports Hall of Fame & Museum Conference Center, 1152 Lakeland Drive, Jackson, Mississippi. Registration will begin at 9:00 a.m. with the meeting to begin at 9:30 a.m..

During the November Annual Meeting we will have representatives from the FDIC and the Federal Reserve who will share their regulatory agencies' perspective on a number of important topics, as well as issues facing all of us in 2015. Among the topics they will cover are BSA, HMDA reporting, CRA and Fair Lending. There will also be a short business meeting immediately following lunch.

As always, the dress code for this occasion is casual, and lunch will be provided. We ask that you fax or e-mail your registration to Liz Crabtree no later than Friday, November 14, 2014, so that arrangements for lunch can be finalized. We look forward to seeing you there.

(Ed Wilmesherr)

MRCG-MSRCG COMPLIANCE CALENDAR

10/29/14 – Comment period for proposed HMDA rule ends	05/21/15 – MRCG Quarterly Meeting
11/10/14 – Comment period for proposed changes to TILA-RESPA Integrated Disclosure Rule ends	07/16/15 – MRCG/MSRCG Joint Steering Committee Meeting
11/18/14 – MSRCG Annual Meeting	08/01/15 – Mandatory use of revised TILA/RESPA disclosure takes effect
11/20/14 – MRCG Annual Meeting	08/20/15 – MRCG Quarterly Meeting
01/15/15 – MRCG/MSRCG Joint Steering Committee Meeting	08/25/15 – MSRCG Quarterly Meeting
02/19/15 – MRCG Quarterly Meeting	09/17/15 – MRCG/MSRCG Joint Steering Committee Meeting
02/24/15 – MSRCG Quarterly Meeting	11/17/15 – MSRCG Annual Meeting
04/16/15 – MRCG/MSRCG Joint Steering Committee Meeting	11/19/15 – MRCG Annual Meeting
05/19/15 – MSRCG Quarterly Meeting	