

# DISSECTING DODD-FRANK

A Visual Guide to Competing – and Winning – in Today’s **Complex Compliance Environment**

What does the *Dodd-Frank Wall Street Reform and Consumer Protection Act* mean for your financial institution? This infographic provides some visual insights into the scale of the Dodd-Frank Act compared to its historical predecessors, as well as the regulatory compliance apparatus being assembled to enforce the law’s provisions. For institutions of all sizes, Dodd-Frank compliance creates a new series of data management challenges – and a corresponding set of compliance-focused technology tools and business processes.

## COMPARING THE DENSITY OF PREVIOUS COMPLIANCE INITIATIVES

**Dodd-Frank Act**  
**849 pages**

**21.2**  
**Statues of Liberty**

Laid end to end, the more than 3,500 Federal Register pages generated to describe the act’s resulting rules and regulations would be the same height as 21.2 Statues of Liberty.

**Sarbanes-Oxley**  
**66 pages**

**Glass-Steagall**  
**34 pages**



## CONTRASTING THE EXTENSIVE ROLE ENFORCEMENT AGENCIES WILL PLAY IN DODD-FRANK COMPLIANCE

**22**

federal agencies will administer and enforce various sections of Dodd-Frank. Of these, more than a dozen (shown in bold below) will have direct oversight responsibilities that affect the banking industry:

- Bureau of Competition**
- Bureau of Consumer Protection**
- Commodity Futures Trading Commission**
- Comptroller of the Currency**
- Consumer Financial Protection Bureau**  
Department of Housing and Urban Development
- Department of the Treasury**  
Farm Credit Administration
- Federal Deposit Insurance Corporation**
- Federal Financial Institutions Examination Council**
- Federal Housing Finance Agency**
- Federal Insurance Office**
- Federal Reserve**
- Federal Trade Commission**  
Financial Industry Regulatory Authority
- Financial Stability Oversight Council**  
Government Accountability Office
- Office of Financial Research**
- Office of Thrift Supervision**  
Public Company Accounting Oversight Board
- Securities and Exchange Commission**

## NEW DATA MANAGEMENT REALITIES OF DODD-FRANK

New reporting expectations require banks to collect more data from more sources and to make that data available on demand. Case in point: New reporting fields for mortgage lending.

- Credit score
- Age
- Total points and fees
- Spread between loan APR and benchmark rate
- Prepayment penalty term
- Real property value
- Introductory interest rate period
- Nonfully amortizing payment terms
- Loan term
- Origination channel
- Loan officer unique identifier
- Universal loan identifier
- Parcel identification number

## NEW DATA MANDATES

Existing data management tools aren’t ready to handle the requirements of this regulatory onslaught.

- Standardize and centralize inconsistent data, metadata, business rules, and storage format.
- Move data out of physical storage formats and into digital data stores; build consistent data models that allow banks to run queries, stress-test scenarios, and other modeling tasks.
- Provide instant, real-time access to regulators that will increasingly demand this access, regardless of a bank’s size or organizational profile.
- Eliminate legacy IT infrastructures and data management systems – the product of decades of growth by acquisition – in order to gain transparency and visibility into the business.
- Build data-quality checkpoints to eliminate data accuracy and consistency issues.

## THE NEW COMPLIANCE TOOL KIT

The technology elements of a successful Dodd-Frank compliance strategy:

-  **Data governance**
-  **Business intelligence and analytics**
-  **Master data management**
-  **Real-time reporting and auditing capabilities**
-  **Enterprise content management**
-  **Training, change management, and business process initiatives**

Sources:

- The Wall Street Journal, “Overhaul Grows and Slows,” Dow Jones & Co., May 2, 2011.
- The Fiscal Times, “Who’s Watching the Banks?” The Wood Group LLC., 2012.
- “Dodd-Frank Act Compliance Surprises,” Pierce Fisk LLP, Feb. 15, 2011.