



It is important for your Bank to document the process taken to implement the small business lending collection and reporting requirements of Section 1071 of the Dodd-Frank Act. The CFPB released guidance breaking down the needed Change Management data into the following categories:

- Preparation/Planning
- Updating Computer Systems
- Testing/Validating Systems
- Developing Forms/Applications
- Training Staff and Third Parties (such as Dealers and Brokers)
- Developing Policies/Procedures
- Legal/Compliance Review
- Post-Implementation Review of Compliance Policies and Procedures

CCI has developed a Change Management Log using these categories to assist with the transition for your Bank to comply with the Section 1071 Rule. The Change Management Program Log can be accessed [here](#). Your Bank will want to customize this log to include specifics of your program and additional tasks you will implement.

CCI suggests you forward this information to the employees in charge of the Section 1071 Rule implementation at your Bank. As always, CCI is happy to help with any compliance-related questions.