2017 Regulatory Impact Study

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                Kaleb Seymour, Analyst

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Our 2017 Participant Profile

- 51 credit unions across 27* states
- Volunteers were categorized into three asset ranges, consistent with our previous study

<table>
<thead>
<tr>
<th>Category</th>
<th>Asset Range</th>
</tr>
</thead>
<tbody>
<tr>
<td>Small</td>
<td>$0 - $115M</td>
</tr>
<tr>
<td>Mid-Size</td>
<td>$115M - $1B</td>
</tr>
<tr>
<td>Large</td>
<td>$1B+</td>
</tr>
</tbody>
</table>

Response Distribution by Asset Size

- Large: 43%
- Mid-Sized: 33%
- Small: 24%

*Does not include one credit union based out of Puerto Rico
## Type of Impacts Reviews

<table>
<thead>
<tr>
<th>Impact Type</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Cost</strong></td>
<td>Regulatory-related Staff and 3rd party expenses incurred throughout the major functional areas of the credit unions.</td>
</tr>
<tr>
<td><strong>Specific Regulations</strong></td>
<td>Staff spent on major regulations and quantified into a dollar cost impact</td>
</tr>
<tr>
<td><strong>Strategic Impacts</strong></td>
<td>Impacts to the credit union through the viewpoint of the CEOs. Insight on how resources would have been allocated if not for regulatory cost.</td>
</tr>
</tbody>
</table>

Revenue impacts (including interchange) were excluded from the study. This decision was made to remain conservative in light of challenges with data collection, dollar estimates, and potential variation due to market conditions rather than regulations.
Overall Impacts
## Overall Regulatory Cost Impact – New Elevated “Normal”

<table>
<thead>
<tr>
<th></th>
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<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>As a Percent of Credit Union Assets</strong></td>
<td>0.54%</td>
<td>0.46%</td>
<td>0.48%</td>
<td>0.46%</td>
<td>-0.08%</td>
<td>0.0%</td>
</tr>
<tr>
<td><strong>In Billions of Dollars</strong></td>
<td>$6.1 billion</td>
<td>$5.3 billion</td>
<td>$6.3 billion</td>
<td>$6.1 billion</td>
<td>+$0.2 billion</td>
<td>+$0.8 billion</td>
</tr>
</tbody>
</table>

- As context, the annual financial impact is:
  - 61% of 2016 industry earnings
  - 4.3% of 2016 industry new worth
- The cost impact is 15% of 2016 industry operating expenses

Weighted information reflects the extrapolation of the results based on the asset distribution of the industry vs the distribution of the respondents where the median asset size of respondents increased from $293 million in the 2015 study to $734 million in the current study.
Scale Still Matters

Median Regulatory Costs By Asset Size
(As a % of Assets)

Small: 1.12% 2014, 0.69% 2016
Mid-Size: 0.49% 2014, 0.48% 2016
Large: 0.33% 2014, 0.43% 2016
Total - Weighted: 0.46% 2014, 0.46% 2016

Median Industry CU Impact

$114k Small
$1.2M Mid-Size
$7.9M Total - Weighted
Cost Impacts
Changes in Regulation Have Outsized Impacts for Smaller Credit Unions

![Annual Weighted Regulatory Cost Impact - By Asset Size and Overall (As a % of Assets)](chart)

<table>
<thead>
<tr>
<th>Asset Size</th>
<th>25th Percentile</th>
<th>Median</th>
<th>75th Percentile</th>
</tr>
</thead>
<tbody>
<tr>
<td>Small</td>
<td>0.30%</td>
<td>0.69%</td>
<td>1.07%</td>
</tr>
<tr>
<td>Mid-Size</td>
<td>0.35%</td>
<td>0.48%</td>
<td>0.73%</td>
</tr>
<tr>
<td>Large</td>
<td>0.24%</td>
<td>0.43%</td>
<td>0.56%</td>
</tr>
<tr>
<td>Total</td>
<td>0.28%</td>
<td>0.46%</td>
<td>0.66%</td>
</tr>
</tbody>
</table>
While The Mix of Costs Are Similar Across Asset Groups, One-Time Investments Appear Complete
The Investments Have Freed Up Some Time But the Level of Effort is Still Substantial

<table>
<thead>
<tr>
<th></th>
<th>2014</th>
<th>2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>Small</td>
<td>45%</td>
<td>32%</td>
</tr>
<tr>
<td>Mid-Size</td>
<td>24%</td>
<td>21%</td>
</tr>
<tr>
<td>Large</td>
<td>17%</td>
<td>19%</td>
</tr>
<tr>
<td>Total - Weighted</td>
<td>22%</td>
<td>21%</td>
</tr>
</tbody>
</table>
Staff Impact In All Areas of the Credit Union

**Risk**
Back office functions often dedicated to regulatory duties

E.g., Compliance, Audit, BSA / AML, ERM, Vendor Management

**Member-Facing**
Employees who directly interact with members

E.g., Branch, Call Center, Loan Origination, Collections, Online Banking

**Support**
All other back office functions

E.g., Finance, IT, HR
Member-Facing Staff Continues to Bear the Brunt of the Regulatory Requirements

REGULATORY STAFF COST DISTRIBUTION BY STAFF TYPE - OVERALL AND BY ASSET SIZE

- 2014
  - Small: 30% (Risk), 25% (Support), 45% (Member Facing)
  - Mid-Size: 32% (Risk), 35% (Support), 33% (Member Facing)
  - Large: 37% (Risk), 50% (Support), 13% (Member Facing)
  - Total - Weighted: 33% (Risk), 25% (Support), 42% (Member Facing)

- 2016
  - Small: 25% (Risk), 32% (Support), 43% (Member Facing)
  - Mid-Size: 53% (Risk), 52% (Support), 25% (Member Facing)
  - Large: 69% (Risk), 65% (Support), 6% (Member Facing)
  - Total - Weighted: 30% (Risk), 30% (Support), 40% (Member Facing)

Legend: Risk | Member Facing | Support
Audit Had a Big Jump as Credit Unions Focus on the 3rd Line of Defense

Distribution of Regulatory Direct Staff Expense By Risk Management Function

2014

- Compliance: 28%
- Audit: 11%
- BSA / AML: 40%
- Vendor: 10%
- ERM: 12%

2016

- Compliance: 29%
- Audit: 21%
- BSA / AML: 36%
- Vendor: 8%
- ERM: 6%
Mix of Regulatory Member-Facing Staff Skews More Toward Lending

**Member-Facing Regulatory Staff by Function**

- **2014**
  - Branch: 54%
  - Lending: 25%
  - Other: 21%

- **2016**
  - Branch: 49%
  - Lending: 37%
  - Other: 14%

**Member-Facing Regulatory Staff as a % of Credit Union Staff - By Asset Size and Overall**

- Small: 2014 - 18%, 2016 - 14%
- Mid-Size: 2014 - 8%, 2016 - 12%
- Large: 2014 - 12%, 2016 - 12%
- Total - Weighted: 2014 - 11%, 2016 - 12%
Loan Operations Increase Align with Lending Increase, While Lower IT Reflects Past Investment

Support Regulatory Staff by Function

2014
- Loan Operations: 27%
- Deposit Operations: 14%
- Finance: 16%
- IT: 23%
- HR: 12%
- Other: 7%

2016
- Loan Operations: 46%
- Deposit Operations: 18%
- Finance: 7%
- IT: 11%
- HR: 7%
- Other: 11%

Support Regulatory Staff as a % of Total Credit Union Staff

- Small: 14% (2014), 8% (2016)
- Mid-Size: 5% (2014), 5% (2016)
- Large: 3% (2014), 5% (2016)
- Total - Weighted: 5% (2014), 5% (2016)
More External Assistance for Lending Aligns with Relative Increase in Other Cost Types

Distribution of Regulatory 3rd Party Expenses by Function

2014
- Lending: 20%
- Member Services: 29%
- Finance: 13%
- IT: 17%
- Human Resources: 10%
- Risk: 12%

2016
- Lending: 33%
- Member Services: 26%
- Finance: 19%
- IT: 14%
- Human Resources: 4%
- Risk: 14%

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Go-Forward Regulatory Investments Focus On Lending

Distribution of Capitalized Costs by Function

**2014**
- Lending: 43%
- Member Services: 19%
- Finance: 4%
- IT: 12%
- Human Resources: 12%
- Risk: 10%

**2016**
- Lending: 59%
- Member Services: 20%
- IT: 13%
- Risk: 6%
- Finance: 1%

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Impact of Specific Regulations
Top 3 Costliest Regulations Are Long-Standing, While Most of Lending-Related

<table>
<thead>
<tr>
<th>Regulation</th>
<th>Area/Function</th>
<th>Reg Costs</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Electronic Funds Transfers (Reg E)</td>
<td>Mem Services/Deposit Ops</td>
<td>$589</td>
<td>9.6%</td>
</tr>
<tr>
<td>Expedited Funds Availability/Check 21 (Reg CC)</td>
<td>Mem Services/Deposit Ops</td>
<td>$545</td>
<td>8.9%</td>
</tr>
<tr>
<td>Bank Secrecy Act/ AML</td>
<td>Mem Services/Deposit Ops</td>
<td>$530</td>
<td>8.6%</td>
</tr>
<tr>
<td>Prudential Regulation</td>
<td>All areas</td>
<td>$501</td>
<td>8.1%</td>
</tr>
<tr>
<td>TILA/RESPA Integrated Disclosure</td>
<td>Residential (RE) Lending</td>
<td>$497</td>
<td>8.1%</td>
</tr>
<tr>
<td>Truth in Lending/Regulation Z</td>
<td>Consumer, RE Lending</td>
<td>$490</td>
<td>8.0%</td>
</tr>
<tr>
<td>Equal Credit Opportunity Act/Reg B</td>
<td>All lending</td>
<td>$408</td>
<td>6.6%</td>
</tr>
<tr>
<td>Truth in Savings/Regulation DD</td>
<td>Mem Services/Deposit Ops</td>
<td>$396</td>
<td>6.4%</td>
</tr>
<tr>
<td>Fair Credit Reporting Act &amp; FACT Act</td>
<td>Consumer, RE Lending</td>
<td>$320</td>
<td>5.2%</td>
</tr>
<tr>
<td>Military Lending Act</td>
<td>Consumer Lending</td>
<td>$227</td>
<td>3.7%</td>
</tr>
<tr>
<td>IRS Reporting</td>
<td>Mem Services/Deposit Ops</td>
<td>$198</td>
<td>3.2%</td>
</tr>
<tr>
<td>Real Estate Settlement Procedures Act/ (RESPA)</td>
<td>Residential Lending</td>
<td>$196</td>
<td>3.2%</td>
</tr>
<tr>
<td>Home Mortgage Disclosure / Reg C (HMDA)</td>
<td>Residential Lending</td>
<td>$155</td>
<td>2.5%</td>
</tr>
<tr>
<td>Privacy (Reg P)</td>
<td>Mem Services/Deposit Ops</td>
<td>$153</td>
<td>2.5%</td>
</tr>
<tr>
<td>UDAAP (unfair, deceptive, abusive acts/practices)</td>
<td>Consumer Lending</td>
<td>$148</td>
<td>2.4%</td>
</tr>
<tr>
<td>Service Members Civil Relief Act</td>
<td>Consumer Lending</td>
<td>$75</td>
<td>1.2%</td>
</tr>
<tr>
<td>SBA Rules</td>
<td>Business Lending</td>
<td>$20</td>
<td>0.3%</td>
</tr>
<tr>
<td>Other</td>
<td>All Areas</td>
<td>$698</td>
<td>11.4%</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td>$6,144</td>
<td>100.0%</td>
</tr>
</tbody>
</table>
## Other Regulations Sited By Respondents With Greatest Burden

<table>
<thead>
<tr>
<th>Area / Function</th>
<th>Top Regulatory Impacts</th>
</tr>
</thead>
<tbody>
<tr>
<td>Risk and Compliance</td>
<td>• Burden and resources required during regulatory examinations</td>
</tr>
<tr>
<td></td>
<td>• Telephone Consumer Protections Act (TCPA)</td>
</tr>
<tr>
<td>Residential Lending</td>
<td>• Secure and Fair Enforcement for Mortgage Licensing Act of 2008 (SAFE Act)</td>
</tr>
<tr>
<td></td>
<td>• Telephone Consumer Protections Act (TCPA)</td>
</tr>
<tr>
<td>Consumer Lending</td>
<td>• Consumer Collections</td>
</tr>
<tr>
<td></td>
<td>• Credit Card Act</td>
</tr>
<tr>
<td></td>
<td>• Telephone Consumer Protections Act (TCPA)</td>
</tr>
<tr>
<td>Deposit Operations</td>
<td>• Automated Clearing House (ACH)</td>
</tr>
<tr>
<td></td>
<td>• Customer Identification Program (CIP)</td>
</tr>
<tr>
<td>Member Services</td>
<td>• Office of Foreign Assets Control (OFAC)</td>
</tr>
<tr>
<td></td>
<td>• Overdraft Protection</td>
</tr>
<tr>
<td>Finance</td>
<td>• Current Expected Credit Loss (CECL)</td>
</tr>
<tr>
<td></td>
<td>• Call Reporting</td>
</tr>
<tr>
<td></td>
<td>• IRS Reporting</td>
</tr>
<tr>
<td>IT</td>
<td>• Cybersecurity (Reg 748)</td>
</tr>
<tr>
<td></td>
<td>• Federal Financial Institutions Examination Council (FFIEC) Guidelines</td>
</tr>
<tr>
<td>Legal</td>
<td>• Collections</td>
</tr>
<tr>
<td></td>
<td>• Lending Disclosures</td>
</tr>
<tr>
<td></td>
<td>• Review of new regulations including CFPB rules</td>
</tr>
</tbody>
</table>
TRID Takes Up Over One-Third of Regulatory Time for Residential Lenders

Allocation of Regulatory Costs - Residential Lending

- TRID: 38%
- HMDA / Reg C: 10%
- RESPA / Reg C: 15%
- Truth in Lending / Reg Z: 13%
- Equal Credit Opp. Act / Reg B: 10%
- Fair Credit Reporting / FACT: 7%
- Other: 7%
Consumer Lending Impact Was Similar Across Multiple Regulations

Allocation of Regulatory Costs - Consumer Lending

- Truth in Lending/ Regulation Z: 23%
- Equal Credit Opportunity Act/ Reg B: 20%
- Military Lending Act: 16%
- Fair Credit Reporting Act & FACT Act: 17%
- Service Members Civil Relief Act: 5%
- UDAAP: 11%
- Other: 8%
- Other: 8%
Few Regulations on Business Lending Which Impacted Mainly Larger Credit Unions

Allocation of Regulatory Costs - Business Lending

- NCUA Rules and Supervision: 60%
- State Regulator Rules and Supervision: 19%
- Equal Credit Opportunity Act/Reg B: 7%
- SBA Rules: 9%
- Other: 5%
Regulatory Impact for Member Services Covered Transactions and New Accounts

Allocation of Regulatory Costs - Member Services

- Electronic Funds Transfers (Reg E): 22%
- Expedited Funds Availability/Check 21 (Reg CC): 21%
- Truth in Savings/Regulation DD: 15%
- Bank Secrecy Act/AML: 18%
- Privacy (Reg P): 6%
- IRS Reporting: 7%
- Other: 11%

Other

23%
Deposit Operations Regulatory Impacts Aligns with Member Services Where Requests Are Initiated

Allocation of Regulatory Costs - Deposit Operations

- Electronic Funds Transfers (Reg E) 21%
- Expedited Funds Availability/ Check 21 (Reg CC) 18%
- Bank Secrecy Act/ AML 23%
- Truth in Savings/ Regulation DD 10%
- IRS Reporting 11%
- Privacy (Reg P) 3%
- Other 14%
The Risk Areas Spent Most of Their Time on Lending-Related Regulations

![Pie chart showing the allocation of regulatory costs by risk areas:]

- Consumer Lending: 20%
- Residential Lending: 29%
- NCUA State Regulations and Reporting: 16%
- Member Services/Deposit Operations: 19%
- Business Lending: 9%
- Other: 7%

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The allocation of regulatory costs by risk areas as shown in the pie chart.
Finance Focused Their Efforts on Reporting Requirements

Allocation of Regulatory Costs - Finance

- NCUA State Regulations and Reporting: 49%
- Residential Lending: 10%
- Business Lending: 6%
- Member Services / Deposit Operations: 11%
- Consumer Lending: 7%
- Other: 17%
IT Efforts Were Very Well Spread Out Across the Credit Union

**Allocation of Regulatory Costs - IT**

- NCUA State Regulations and Reporting: 24%
- Residential Lending: 16%
- Member Services / Deposit Operations: 20%
- Business Lending: 8%
- Consumer Lending: 19%
- Other: 13%
Legal’s Time Was Spent Mainly in Supporting the Lending Functions

Allocation of Regulatory Costs - Legal

- **Consumer Lending**: 31%
- **Residential Lending**: 23%
- **Member Services / Deposit Operations**: 17%
- **Business Lending**: 8%
- **NCUA State Regulations and Reporting**: 14%
- **Other**: 7%

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HR Spent More Time on Member Services Given the Training and Support Required of Branch Staff

Allocation of Regulatory Costs - HR

- Residential Lending: 20%
- Member Services / Deposit Operations: 25%
- Other: 19%
- Consumer Lending: 17%
- NCUA State Regulations and Reporting: 11%
- Business Lending: 8%
Strategic Impacts
CEO Perception of Regulatory Impact Continues To Be in Mortgage and Compliance

Areas With Highest Regulatory Expenses
(Based on # of CEO selections)

Areas With Greatest Productivity Impact
(Based on # of CEO selections)

Areas With Most Lost Revenues
(Based on # of CEO selections)
The Majority of Regulatory Cost (76%) Would Be Used to Benefit Members and Member Growth

Reallocation of Regulatory Costs - All CEOs

- Better Deposit Rates: 25%
- Better Loan Rates: 12%
- Enhanced Alternative Channels: 25%
- Build Capital: 12%
- Marketing: 13%
- Staff Development: 13%
- Additional Physical Locations: 0%

Based on median allocations of all CEO responses
Alternative Channels to Meet Member Needs Was the Top Focus for Larger Credit Unions

Reallocation of Regulatory Costs By Respondent Credit Union CEOs

- **Small Credit Union CEOs**
  - Better Deposit Rates: 26%
  - Better Loan Rates: 15%
  - Marketing: 21%
  - Build Capital: 10%
  - Enhanced Alternative Channels: 7%
  - Staff Development: 21%

- **Mid-Sized Credit Union CEOs**
  - Better Deposit Rates: 28%
  - Build Capital: 19%
  - Enhanced Alternative Channels: 28%
  - Staff Development: 19%
  - Marketing: 6%
  - Additional Physical Locations: 13%

- **Large Credit Union CEOs**
  - Better Deposit Rates: 28%
  - Build Capital: 3%
  - Enhanced Alternative Channels: 28%
  - Better Loan Rates: 28%
  - Staff Development: 14%

Based on median responses for each asset category
Themes & Conclusions
The Level of Strategic Risk Is Higher

<table>
<thead>
<tr>
<th>Four Key Themes</th>
<th>Increased Strategic Risk</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. New Elevated “Normal”</td>
<td>• Higher level of fixed costs that needs to be funded to drive net worth growth to fund loans</td>
</tr>
<tr>
<td>2. Lending and Member / Staff Experience</td>
<td>• Loss of staff due to less satisfying work experiences</td>
</tr>
<tr>
<td>3. Incremental Changes Make Big Difference to Smaller Credit Unions</td>
<td>• Loss of members to other industry players like Fintech who are not burdened by all regulations, especially in Lending</td>
</tr>
<tr>
<td>4. Regulatory Exams Becoming More Onerous Without A Corresponding Increase In Value</td>
<td>• Unknowns about future regulations / exams make planning more difficult -- requiring more use of expensive 3rd parties</td>
</tr>
</tbody>
</table>
Participant Scorecards
# Regulatory Impact Participant Scorecard: Overview of Total Costs

## Total Regulatory Costs as % of Assets

<table>
<thead>
<tr>
<th></th>
<th>Example Credit Union</th>
<th>Large Peer Group</th>
<th>All Participants</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Regulatory Costs as % of Assets</td>
<td>0.50%</td>
<td>0.43%</td>
<td>0.24%</td>
</tr>
<tr>
<td>Regulatory Staff Costs as % of Assets</td>
<td>0.40%</td>
<td>0.29%</td>
<td>0.19%</td>
</tr>
<tr>
<td>3rd Party Regulatory Costs as % of Assets</td>
<td>0.09%</td>
<td>0.06%</td>
<td>0.03%</td>
</tr>
<tr>
<td>Depreciation of Capitalized Total Regulatory Costs as % of Assets</td>
<td>0.01%</td>
<td>0.01%</td>
<td>0.00%</td>
</tr>
</tbody>
</table>

## Composition of Total Regulatory Expenses

<table>
<thead>
<tr>
<th></th>
<th>2016</th>
<th>Average</th>
<th>Total Weighted</th>
</tr>
</thead>
<tbody>
<tr>
<td>Staff Costs</td>
<td>80%</td>
<td>75%</td>
<td>75%</td>
</tr>
<tr>
<td>3rd Party Expenses</td>
<td>18%</td>
<td>23%</td>
<td>23%</td>
</tr>
<tr>
<td>Depreciation of Capitalized Expenses</td>
<td>2%</td>
<td>2%</td>
<td>2%</td>
</tr>
</tbody>
</table>

## Staff Cost Impact

<table>
<thead>
<tr>
<th></th>
<th>2016</th>
<th>Average</th>
<th>Total Weighted</th>
</tr>
</thead>
<tbody>
<tr>
<td>Regulatory FTE as % of Total FTE</td>
<td>24%</td>
<td>19%</td>
<td>21%</td>
</tr>
</tbody>
</table>
## Regulatory Impact Participant Scorecard: Specific Regulation Allocations

<table>
<thead>
<tr>
<th>Regulations</th>
<th>2016</th>
<th>All Participants</th>
</tr>
</thead>
<tbody>
<tr>
<td>Electronic Funds Transfers (Reg E)</td>
<td>11.0%</td>
<td>9.6%</td>
</tr>
<tr>
<td>Expedited Funds Availability/Check 21 (Reg CC)</td>
<td>6.6%</td>
<td>8.9%</td>
</tr>
<tr>
<td>Bank Secrecy Act/ AML</td>
<td>15.8%</td>
<td>8.6%</td>
</tr>
<tr>
<td>Prudential Regulation</td>
<td>5.5%</td>
<td>8.1%</td>
</tr>
<tr>
<td>TILA/RESPA Integrated Disclosure</td>
<td>11.4%</td>
<td>8.1%</td>
</tr>
<tr>
<td>Truth in Lending/Regulation Z</td>
<td>3.5%</td>
<td>8.0%</td>
</tr>
<tr>
<td>Equal Credit Opportunity Act/Reg B</td>
<td>10.5%</td>
<td>6.6%</td>
</tr>
<tr>
<td>Truth in Savings/Regulation DD</td>
<td>10.1%</td>
<td>6.4%</td>
</tr>
<tr>
<td>Fair Credit Reporting Act &amp; FACT Act</td>
<td>3.3%</td>
<td>5.2%</td>
</tr>
<tr>
<td>Military Lending Act</td>
<td>0.5%</td>
<td>3.7%</td>
</tr>
<tr>
<td>IRS Reporting</td>
<td>1.2%</td>
<td>3.2%</td>
</tr>
<tr>
<td>Real Estate Settlement Procedures Act/ (RESPA)</td>
<td>3.6%</td>
<td>3.2%</td>
</tr>
<tr>
<td>Home Mortgage Disclosure / Reg C (HMDA)</td>
<td>1.8%</td>
<td>2.5%</td>
</tr>
<tr>
<td>Privacy (Reg P)</td>
<td>4.0%</td>
<td>2.5%</td>
</tr>
<tr>
<td>UDAAP (unfair, deceptive, abusive acts/practices)</td>
<td>1.0%</td>
<td>2.4%</td>
</tr>
<tr>
<td>Service Members Civil Relief Act</td>
<td>0.5%</td>
<td>1.2%</td>
</tr>
<tr>
<td>SBA Rules</td>
<td>0.4%</td>
<td>0.3%</td>
</tr>
<tr>
<td>Other</td>
<td>9.3%</td>
<td>11.4%</td>
</tr>
<tr>
<td>Total</td>
<td>100.0%</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

*Regulatory costs for Risk & Compliance and Support (Finance, IT, Legal, and HR) functions were allocated to specific regulations based on line of business allocations. For example, assume 20% of Finance’s time was allocated to Residential Lending. That 20% was dispersed based on allocations provided in the Residential Lending section (e.g., 40% TRID, 20% HMDA).