

# RESCINDED



OCC BULLETIN 2015-27

**Subject: Consumer Compliance**  
**Date: May 1, 2015**

**To: Chief Executive Officers and  
Compliance Officers of National Banks,  
Federal Savings Associations, Federal  
Branches and Agencies, Department and  
Division Heads, All Examining Personnel,  
and Other Interested Parties**

Replaced - See OCC 2019-22

## **Description: Revised Interagency Examination Procedures for Consumer Compliance**

**The CFPB has changed the effective date in this document from August 1, 2015, to October 3, 2015.**

### **Summary**

The Task Force on Consumer Compliance of the Federal Financial Institutions Examination Council recently developed these interagency examination procedures for

- Truth in Lending Act (TILA), implemented by Regulation Z.
- Real Estate Settlement Procedures Act (RESPA), implemented by Regulation X.

These procedures reflect Consumer Financial Protection Bureau amendments to Regulations Z and X published in the *Federal Register* in December 2013 and February 2015. Most of the changes to the procedures relate to the integrated mortgage disclosure requirements under TILA and RESPA, commonly referred to as the “TRID” requirements.

This bulletin makes available on the Office of the Comptroller of the Currency (OCC) Web site the revised interagency procedures for the new and amended requirements for Regulations Z and X, which go into effect August 1, 2015. OCC examiners will use these procedures beginning August 1, 2015. The OCC is in the process of incorporating these revised interagency procedures into the “Truth in Lending Act” and “Real Estate Settlement Procedures Act” booklets of the *Comptroller’s Handbook*, which will supplant the interagency procedures once the updates are completed.

### **Note for Community Banks**

Beginning August 1, 2015, these procedures will apply to the examinations of all national banks and federal savings associations that offer consumer credit products covered by TILA and RESPA.

### **Highlights**

- The Federal Financial Institutions Examination Council task force developed these examination procedures to promote consistency in the examination process and communication of supervisory expectations.
- These interagency procedures reflect
  - new requirements for integrated mortgage loan disclosures under TILA and RESPA.
  - amendments to Regulation Z that extend the post-rate lock timing for a revised loan estimate.
  - special provisions on certain construction loans.
- These new and amended regulatory requirements go into effect on August 1, 2015.

### **Further Information**

Please contact your supervisory office or Compliance Policy at (202) 649-5470.

Grovetta N. Gardineer  
Deputy Comptroller for Compliance Operations and Policy

### **Related Links**

- [Interagency TILA/Regulation Z Examination Manual Narrative \(PDF\)](#)
- [Interagency TILA/Regulation Z Examination Procedures \(PDF\)](#)
- [Interagency RESPA/Regulation X Examination Manual Narrative \(PDF\)](#)
- [Interagency RESPA/Regulation X Examination Procedures \(PDF\)](#)