

# RESCINDED

OCC Bulletin 2016-19| June 9, 2016

Transmittal – See OCC 2020-11

## Consumer Compliance: Notice and Request for Comment on Proposed Uniform Interagency Consumer Compliance Rating System

### Summary

The Federal Financial Institutions Examination Council (FFIEC) is seeking public comment on its proposal to revise the existing Uniform Interagency Consumer Compliance Rating System (CC Rating System) to reflect regulatory, supervisory, technological, and market changes since the system was established.

The CC Rating System is a supervisory policy for evaluating financial institutions' adherence to consumer compliance requirements. The proposal to revise the system reflects consumer compliance supervisory approaches already being used.

### Note for Community Banks

When finalized, the revised CC Rating System will apply to all national banks and federal savings associations.

### To

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

### Highlights

In accordance with existing regulatory expectations and FFIEC guidance, national banks and federal savings associations should take appropriate risk mitigation steps, including

- The revisions are designed to more fully align the CC Rating System with the FFIEC agencies' current risk-based, tailored examination approaches.
- The proposed CC Rating System reflects risk-based expectations commensurate with the size, complexity, and risk profile of institutions and incentivizes institutions to prevent, self-identify, and address compliance issues.
- The proposed revisions were not developed with the intention of setting new or higher supervisory expectations for financial institutions, and their adoption will represent no additional regulatory burden.
- The FFIEC invites public comments on any aspect of the attached proposal. Comments must be received 60 days from publication in the *Federal Register*. All comments received, including any personal information provided, will be posted, generally without change, to [www.regulations.gov](http://www.regulations.gov).

### Background

The current CC Rating System, adopted in 1980, is a supervisory policy for evaluating financial institutions'<sup>1</sup> adherence to consumer compliance requirements. The CC Rating

System provides a framework for evaluating institutions based on assessment factors to assign a consumer compliance rating to each institution.

For further information, please contact your supervisory office or the OCC's Compliance Policy Division at (202) 649 5470.

Donna M. Murphy  
Deputy Comptroller for Compliance Risk

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<sup>1</sup> The term "financial institutions" is defined in 12 USC 3302(3).

#### Related Link

- [Uniform Interagency Consumer Compliance Rating System-81 Fed. Reg. 26553, May 3, 2016](#)

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