

RESCINDED

OCC Bulletin 2020-84| September 30, 2020

Truth in Lending Act: Revised Interagency Examination Procedures

Replaced – See OCC Bulletin 2021-51

Summary

The Task Force on Consumer Compliance of the Federal Financial Institutions Examination Council¹ (FFIEC) has adopted revised interagency examination procedures for the Truth in Lending Act (TILA), implemented by Regulation Z. The revised interagency procedures reflect amendments to Regulation Z published in the *Federal Register* through May 18, 2018.

Rescissions

This bulletin rescinds the "Truth in Lending Act" booklet of the *Comptroller's Handbook*. Office of the Comptroller of the Currency (OCC) examiners should rely on the revised interagency procedures. Also rescinded is OCC Bulletin 2018-31, "Truth in Lending Act: Revised Comptroller's Handbook Booklet and Rescissions."

To

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

Note for Community Banks

These interagency procedures apply to the examinations of all OCC-supervised banks covered by TILA.²

Highlights

The FFIEC members developed these procedures to promote consistency in the examination process and communication of supervisory expectations. These interagency procedures reflect

- amendments to Regulation Z that relate to the TILA-RESPA Integrated Mortgage Disclosure Rule.³

- amendments to TILA relating to the Economic Growth, Regulatory Relief, and Consumer Protection Act, including
 - provisions relating to high-cost loans, appraisals, and student lending.
 - an additional type of qualified mortgage for insured depository institutions with less than \$10 billion in assets.
 - an additional type of escrow exemption for insured depository institutions with less than \$10 billion in assets.

Further Information

Please contact Paul R. Reymann, Director for Consumer Compliance Policy, at (202) 649-5470.

Grovetta N. Gardineer
Senior Deputy Comptroller for Bank Supervision Policy

Related Links

- ["Interagency Truth in Lending Act Examination Procedures" \(PDF\)](#)

¹The FFIEC consists of the following six voting members: a member of the Board of Governors of the Federal Reserve System; the Chair of the Federal Deposit Insurance Corporation; the Director of the Consumer Financial Protection Bureau; the Comptroller of the Currency; the Chair of the National Credit Union Administration; and the Chair of the State Liaison Committee.

²"Banks" refers to national banks, federal savings associations, and federal branches and agencies of foreign banking organizations. The OCC has TILA/Regulation Z supervisory authority only for banks with \$10 billion or less in assets. Refer to 12 CFR 1026.1(c), "Coverage," for details about banks covered by TILA.

³RESPA stands for Real Estate Settlement Procedures Act. Refer to 82 Fed. Reg. 37656 and 83 Fed. Reg. 19159.