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

Summary

The Task Force on Consumer Compliance of the Federal Financial Institutions Examination Council\(^1\) (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


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.