

SUPERVISORY LETTER

Initial Information Request Date: Click here to enter a date.

Entity name: [type] City, State: [type]

Institution Product Line(s)

Reviewed: Choose an item.

Affiliated Organizations

Reviewed:

If examiners reviewed the activities of affiliated organizations that fall under the CFPB's jurisdiction, insert the organizations' names. If not, type N/A.

CFPB Region: Choose an item.

CFPB Exam ID Number: 0000 CFPB Docket Number: 00000

Entity Type: Choose an item.

Review Type: For Target Reviews, if applicable, also list the following

(after a bullet):

• Baseline Compliance Management System Review

ECOA Baseline Review

• ECOA Target Review – <Insert the IPL reviewed>

HMDA Compliance Review

• Follow-Up Review – <Insert "Matters Requiring Attention," "Memorandum of Understanding,"

"Resolution," and/or "Consent Order">

Prohibition of Disclosure or Release

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AREA REVIEWED: Choose an item.	X
AREA REVIEWED: Choose an item.	X
AREA REVIEWED: Baseline Compliance Management System Review	X
AREA REVIEWED: ECOA Target Review – <insert ipl="" reviewed="" the=""></insert>	X
AREA REVIEWED: HMDA Compliance Review	X
AREA REVIEWED: Follow-up Review – <insert "conser<="" "mou,"="" "mra,"="" or="" td=""><td>nt Order"></td></insert>	nt Order">
X	

Scope of Review

Use sample language below, as appropriate.

Consumer Financial Protection Bureau (CFPB) examiners conducted a targeted review of <Insert entity's full name> (<Insert entity's short name>). <Insert optional one – two sentences describing the entity's business operation and size.> The review period for the examination was Click here to enter a date., through Click here to enter a date. <Insert optional sentence regarding on-site start date.>

Examiners evaluated <(Insert entity's short name)>'s compliance management system (CMS) with respect to <Insert IPL if applicable. *If not applicable, end the sentence after (CMS)*.>. Examiners reviewed the following CMS components:

- Board of Directors (Board) and management oversight
- Compliance program (policies and procedures, training, and monitoring and corrective action
- Consumer complaint response
- Compliance audit
- Service provider oversight

Examiners used the following modules from the <Insert IPL> examination procedures found in the *CFPB Supervision and Examination Manual*:

- Module <Insert module number and title>
- Module <Insert module number and title>
- Module <Insert module number and title>

Examiners reviewed <Insert entity's short name>'s <Insert IPL(s)> activities for compliance with certain requirements of the following Federal consumer financial laws: 1

- Consumer Leasing Act (CLA) Regulation M
- Electronic Fund Transfer Act (EFTA) Regulation E
- Equal Credit Opportunity Act (ECOA) Regulation B
- Fair Credit Reporting Act (FCRA) Regulation V
- Fair Debt Collection Practices Act (FDCPA)
- Home Mortgage Disclosure Act (HMDA) Regulation C
- Homeowners Protection Act (HPA)
- Privacy of Consumer Financial Information Regulation P
- Real Estate Settlement Procedures Act (RESPA) Regulation X
- Secure and Fair Enforcement for Mortgage Licensing Act (SAFE Act) Regulation G
- Truth in Lending Act (TILA) Regulation Z
- Truth in Savings Act (TISA) Regulation DD

Docket No. < Insert docket number>

¹ Federal consumer financial law is defined by Section 1002(14) of Title X of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (12 USC 5481(14)).

Include the following sentence (and footnote that includes the legal citation) only if:

- Examiners used the CFPB's examination procedures for Unfair, Deceptive, or Abusive Acts or Practices (UDAAP);
- The IPL modules reviewed specifically required a review for UDAAP; or
- The examiners found issues during the review that were determined to be UDAAPs.

Examiners also reviewed whether the entity was engaging in unfair, deceptive, or abusive acts or practices (UDAAP).²

Conclusions and Comments

[type]

At the end of Conclusions and Comments, use the sample language below if the CFPB will use the Enforcement process to address certain specified matters.

<Insert one of the following as a lead-in to the sentence: Some of these violations or All of these violations>, any additional violations that might be identified in the course of investigating this conduct, and any <Insert "additional" if applicable> corrective action, including remediation, will be addressed through the Enforcement process.

/s/ <u>EIC signature</u> Insert typed name of EIC Examiner-in-Charge

/s/ FM signature
Insert typed name of FM
Field Manager

.

² 12 USC 5531 and 5536.

Matters Requiring Attention (MRAs)

Select one of the following sentences:

This Supervisory Letter includes no matters requiring attention (MRAs).

OR

The following matters requiring attention (MRAs) require a written response to the CFPB.

 $\cap R$

The following matter requiring attention (MRA) requires a written response to the CFPB.

Reporting date: <Insert # **of days>** calendar days from the transmittal³ of this Supervisory Letter (Letter) and, every **<Insert** # **of days>** calendar days thereafter until the MRA is complete, provide the CFPB progress reports on fulfilling the following MRAs. Include in the report(s) details on the steps taken to complete the MRA(s) and the results.⁴

Compliance Management Review

Board and Management Oversight

1. <Insert MRA>

<u>Completion due date</u>: < Insert # of days > calendar days from the transmittal of this Letter.

Compliance Program

Policies and Procedures

2. <Insert MRA>

<u>Completion due date</u>: <<u>Insert # of days</u>> calendar days from the transmittal of this Letter.

Training

3. <Insert MRA>

<u>Completion due date</u>: <<u>Insert # of days</u>> calendar days from the transmittal of this Letter.

Monitoring and Corrective Action

4. <Insert MRA>

<u>Completion due date</u>: <<u>Insert # of days</u>> calendar days from the transmittal of this Letter.

Consumer Complaint Response

5. <Insert MRA>

<u>Completion due date</u>: <<u>Insert # of days</u>> calendar days from the transmittal of this Letter.

Docket No. <Insert docket number>

³ The transmittal date is the date that the CFPB emails the Supervisory Letter to the supervised entity.

⁴ If a reporting date falls on a weekend or holiday, the report will be considered timely on the following business day.

Compliance Audit

6. <Insert MRA>

<u>Completion due date</u>: <<u>Insert # of days</u>> calendar days from the transmittal of this Letter.

Service Provider Oversight

7. <Insert MRA>

<u>Completion due date</u>: <<u>Insert # of days</u>> calendar days from the transmittal of this Letter.

Area Reviewed: Choose an item.

Insert module title, where possible.

8. <Insert MRA>

<u>Completion due date</u>: <<u>Insert # of days</u>> calendar days from the transmittal of this Letter.

Insert module title, where possible

9. <Insert MRA>

<u>Completion due date</u>: <<u>Insert # of days</u>> calendar days from the transmittal of this Letter.

Insert module title, where possible

10. <Insert MRA>

<u>Completion due date</u>: <<u>Insert # of days</u>> calendar days from the transmittal of this Letter.

Review and Findings

Compliance Management Review

Conclusion

The <Insert entity's short name>'s compliance management system (CMS) is Choose an item.. [type]

Comments and Supporting Analysis

Board of Directors and Management Oversight

The <Insert entity's short name>'s Board and management oversight is Choose an item.. <Insert discussion after the lead-in sentence.>

Compliance Program

The <Insert entity's short name>'s compliance program is Choose an item.. <Insert discussion after the lead-in sentence.>

Policies and Procedures

[type]

Training

[type]

Monitoring and Corrective Action

[type]

Consumer Complaint Response

The <Insert entity's short name>'s consumer complaint response is Choose an item.. <Insert discussion after the lead-in sentence.>

Compliance Audit

The <Insert entity's short name>'s compliance audit is Choose an item.. <Insert discussion after the lead-in sentence.>

Service Provider Oversight

The <Insert entity's short name>'s service provider oversight is Choose an item.. <Insert discussion after the lead-in sentence.>

Area Reviewed: Choose an item.

Conclusion

[type]

Comments and Supporting Analysis

[type]