

EXAMINATION REPORT

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 If examiners reviewed the activities of affiliated

Reviewed: organizations that fall under the CFPB's jurisdiction,

Insert the organizations' names. If not, type N/A.

CFPB Region: Choose an item.

CFPB Event ID: 0000 CFPB Supervision ID: 00000

Entity Type: Choose an item.

Review Type Point-in-Time Examination

Prohibition of Disclosure or Release

This document is the property of the Consumer Financial Protection Bureau (CFPB), and the CFPB furnishes this document to the entity for its confidential use. The entity's directors, officers, or employees may not disclose the report or any portion of it except as provided in 12 CFR Part 1070.

If the entity receives a subpoena or other legal process calling for production of, or testimony regarding, this document, notify the Regional Director and the CFPB General Counsel immediately. Advise the party issuing the subpoena and, as appropriate, the court of the above prohibition and refer them to 12 CFR Part 1070.

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AREA REVIEWED: Choose an item.	X
AREA REVIEWED: Choose an item.	X
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AREA REVIEWED: HMDA Compliance Review	X

Scope of Review

Use sample language below, as appropriate.

Consumer Financial Protection Bureau (CFPB or Bureau) examiners conducted a point-in-time examination 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 the Bank's compliance management system (CMS) with respect to <Insert IPL>. Examiners reviewed the following CMS components:

- Board and management oversight
- Compliance program (policies and procedures, training, monitoring and/or audit, and consumer complaint response)
- 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

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

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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)).

• 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]

<If the report contains Supervisory Recommendations, insert the following sentence after comments and conclusions related to CMS: This report contains Supervisory Recommendations for management to consider related to these CMS weaknesses.>

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.

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² 12 USC 5531 and 5536.

Consumer Compliance Rating³

The overall compliance rating is "Choose the consumer compliance rating." and is based on the findings discussed in this Examination Report. The rating is based upon a scale of "1" through "5" in increasing order of supervisory concern; a rating of "1" represents the highest rating and consequently the lowest level of supervisory concern, while "5" represents the lowest, most critically deficient level of performance, and therefore, the highest degree of supervisory concern.

Include one of the following and delete the other statement:

In a prior CFPB examination report, transmitted <Insert transmittal date>, <Insert entity's name> was rated "Choose the consumer compliance rating."

OR

The CFPB has not previously examined <Insert entity's name>.

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

/s/ <u>FM signature</u> Insert typed name of FM Field Manager

³ The CFPB has adopted the FFIEC Uniform Consumer Compliance Rating System. For more information, see the chapter "Examination Process" in the *CFPB Supervision and Examination Manual* (https://www.consumerfinance.gov/policy-compliance/guidance/supervision-examinations/).

Matters Requiring Attention (MRAs)

Select one of the following sentences:

This Examination Report includes no matters requiring attention (MRAs).

OR

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

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

Reporting date: <Insert # of days> calendar days from the transmittal⁴ of this Examination Report 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.⁵

Area Reviewed: Choose an item.

Insert module title, where possible.

1. <Insert MRA>

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

Insert module title, where possible

2. <Insert MRA>

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

Insert module title, where possible

3. <Insert MRA>

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

⁴ The transmittal date is the date that the CFPB emails the Report to the supervised entity.

⁵ If a reporting date falls on a weekend or holiday, the report will be considered timely on the following business day.

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 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.>

Supervisory Recommendation(s):

1. <Insert SR>

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

The <Insert entity's short name>'s policies and procedures are Choose an item.. <Insert discussion after the lead-in sentence.>

Supervisory Recommendation(s):

1. <Insert SR>

Training

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

Supervisory Recommendation(s):

1. <Insert SR>

Monitoring and/or Audit

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

Supervisory Recommendation(s):

1. <Insert SR>

Consumer Complaint Response

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

Supervisory Recommendation(s):

1. <Insert SR>

Service Provider Oversight

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

Supervisory Recommendation(s):

1. <Insert SR>

Area Reviewed: Choose an item.

Conclusion

[type]

Comments and Supporting Analysis

[type]