

**Subject: Consumer Compliance**  
**Date: November 6, 2015**

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

**Description: Initial Examinations for Compliance With TILA-RESPA Integrated Disclosure  
Rule**

**Summary**

The Office of the Comptroller of the Currency (OCC) is providing guidance regarding initial examinations of OCC-supervised institutions for compliance with the Truth in Lending Act and Real Estate Settlement Procedures Act Integrated Disclosure Rule. The rule went into effect on October 3, 2015.

**Note for Community Banks**

This guidance applies to national banks and federal savings associations (collectively, banks) with \$10 billion or less in total assets.

**Highlights**

- During initial examinations for compliance with the rule, OCC examiners are evaluating a bank's compliance management system and overall efforts to come into compliance, recognizing the scope and scale of changes necessary for each bank to achieve effective compliance.
- Examiners expect banks to make good faith efforts to comply with the rule's requirements in a timely manner. Specifically, examiners are considering the bank's implementation plan, including actions taken to update policies, procedures, and processes, as well as training of appropriate staff and handling of early technical problems or other implementation challenges.
- The OCC's supervisory approach regarding the rule is similar to the approach the OCC took in initial examinations for compliance with the mortgage rules implementing provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act that went into effect in January 2014.

**Background**

On May 1, 2015, the OCC issued Bulletin 2015-27, "Consumer Compliance: Revised Interagency Examination Procedures for Consumer Compliance," which made available on the OCC Web site the revised interagency examination procedures for the new and amended requirements for Regulations Z and X. These requirements became effective on October 3, 2015. Most of the changes to the procedures relate to the integrated mortgage disclosure requirements under the Truth in Lending Act (TILA) and the Real Estate Settlement Procedures Act (RESPA). The OCC is in the process of incorporating these revised interagency procedures into the "Truth in Lending Act" and "Real Estate Settlement Procedures Act" booklets of the *Comptroller's Handbook*. Once the revisions are complete, examiners should use the revised booklets instead of the interagency procedures.

**Further Information**

Please contact Kimberly Hebb, Director for Compliance Policy, at (202) 649-5470 for additional information.

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#### **Related Links**

- [Interagency TILA/Regulation Z Examination Manual Narrative \(PDF\)](#)
- [Interagency TILA/Regulation Z Examination Procedures \(PDF\)](#)
- [Interagency RESPA/Regulation X Examination Manual Narrative \(PDF\)](#)
- [Interagency RESPA/Regulation X Examination Procedures \(PDF\)](#)