

comments should be included in the Risk Profile and/or ROE to support this conclusion.

Consultation Policy

Consultations between Field, Regional and Washington staff members help maintain the quality and consistency of compliance, fair lending and CRA examinations and supervision. Consultation alerts senior DSC officials to significant or unusual supervisory issues, which ensures that these issues receive appropriate and timely consideration. Current information from examiners in the field also helps the FDIC and interagency groups develop more realistic policies and regulations.

Depending on the issue, a consultation may be anything from a simple phone conversation or a series of e-mails, to formal memoranda. Examination staff should consult with regional or field office management or staff if they find an unusual issue or problem. In turn, regional or field office management and staff are encouraged to consult with Washington subject matter experts, particularly with respect to findings, issues or

potential violations requiring guidance with respect to new regulations, or involving emerging/sensitive policy concerns.

Certain situations, because of their sensitivity or potential impact, mandate that the Regional and/or Washington office(s) be consulted. Actions that require either approval or concurrence under delegated authority or DSC policy also require formal documentation.

If a consultation results in an outcome inconsistent with the examiner's recommendation, then the examiner and the review examiner should ensure that the language of the ROE is consistent with the final outcome.

References

DSC RD Memo 04-017: Consultation Policy and Procedures for Compliance Examination and Community Reinvestment Act Issues

<http://fdic01/division/dsc/memos/memos/6000/04-017.pdf>