



Federal Deposit Insurance Corporation
550 17th Street NW, Washington, D.C. 20429-9990

Financial Institution Letter
FIL-43-2015
October 2, 2015

Supervisory Expectations for Financial Institutions Implementing the Truth in Lending Act (Regulation Z) and Real Estate Settlement Procedures Act (Regulation X) Integrated Disclosure Rule

Summary: The FDIC is providing guidance on its initial supervisory expectations in connection with its examinations of financial institutions for compliance with the Truth in Lending Act (TILA) – Real Estate Settlement Procedures Act (RESPA) Integrated Disclosure Rule (TRID Rule), which is effective October 3, 2015.

Statement of Applicability to Institutions Under \$1 Billion in Total Assets: This Financial Institution Letter applies to all FDIC-supervised institutions

Distribution:
FDIC-supervised institutions

Suggested Routing:
Chief Executive Officer
Chief Compliance Officer
Chief Loan Officer

Related Topics:
Dodd-Frank Wall Street Reform and Consumer Protection Act
Truth in Lending Act (Regulation Z)
Real Estate Settlement Procedures Act (Regulation X)

Attachment:
[Compliance Examination Manual](#)

Contact:
Cassandra Duhaney, Senior Policy Analyst
CDuhaney@FDIC.gov or (202) 898-6804

Simin Ho, Senior Policy Analyst
SHo@FDIC.gov or (202) 898-6907

Note:
FDIC financial institution letters (FILs) may be accessed from the FDIC's Web site at www.fdic.gov/news/news/financial/2015/index.html.

To receive FILs electronically, please visit <http://www.fdic.gov/about/subscriptions/fil.html>.

Paper copies of FDIC financial institution letters may be obtained through the FDIC's Public Information Center, 3501 Fairfax Drive, E-1002, Arlington, VA 22226 (1-877-275-3342 or 703-562-2200).

Highlights:

- If mortgage loans are part of the scope of an FDIC consumer compliance examination, examiners will use interagency examination procedures to evaluate financial institutions for compliance with the TRID Rule. These procedures are available in the FDIC's Compliance Examination Manual.
- During initial examinations for compliance with the TRID Rule, FDIC examiners will evaluate an institution's compliance management system and overall efforts to come into compliance, recognizing the scope and scale of changes necessary for each supervised institution to achieve effective compliance.
- Examiners will expect supervised entities to make good faith efforts to comply with the TRID Rule's requirements in a timely manner. Specifically, examiners will consider the institution's implementation plan, including actions taken to update policies, procedures, and processes, its training of appropriate staff, and its handling of early technical problems or other implementation challenges.
- The FDIC's supervisory approach regarding the TRID Rule will be similar to the approach the FDIC took in initial examinations for compliance with the Ability-to-Repay/Qualified Mortgage rules that became effective in January, 2014.