ASSESSMENT OF RISK OF CONSUMER HARM (ARCH)

General Instructions

The ARCH is used to document the scope of all examinations. The ARCH contains a series of questions and *Examiner Summary* sections to document risk assessment, mitigations to inherent or identified risk, and conclusions. The questions provided are not intended to cover every potential risk or mitigation, but set out a basic framework to assist an examiner in assessing and documenting the initial risk assessment and on-site plan of action for the institution. Examiners should provide additional explanation and support for these assessments, as necessary, in the *Examiner Summary* sections in the memorandum. Sections 1-3 should be completed and submitted for approval prior to the on-site portion of the examination. Section 4 should be completed and approved if material changes to the scope of the examination are warranted. Post examination comments are not required. *See Appendix A for list of regulations and a link to the Consumer Harm matrices.*

OVERVIEW - Institution and Examination Information

Bank Name:
City/State:
Region/Territory/FO:
FO Performing Exam:
Cert Number:
Exam Number:
EIC:
Review Examiner:
HMDA Reporter:
Start Date of Examination:
Date of Previous Compliance Examination ("Rating"):
Date of Previous CRA Examination and Type ("Rating-verbiage"):
Date of Previous Risk Examination (CAMELS):

Report of Condition and Income

	XX/XX/20XX	XX/XX/20XX	Annualized Growth Rate
Total Assets:			
Total Loans:			
Total Deposits:			
Non-Interest Income:			
Total Income:			

Breakdown of Loan Portfolio

	Dollar Value	% of Portfolio
Consumer Loans:		
Commercial Loans:		
Farm Loans:		
Multi-Family Loans:		
Residential Loans:		
Other Loans:		

SAER Comment

Applicable comments will pre-populate.

SECTION 1 – IDENTIFICATION OF INHERENT RISK

This section includes a description of the Bank Structure, Supervisory History, and applicable Operations. "Yes" responses = potential risk.

Bank Structure	Response	
1. Are there factors or changes in the following areas that *raise compliance risk:*		
a. Control of the bank?	a.	
b. Directors?	b.	**Select...**
c. Senior Officers or key personnel (Compliance or other policy makers)?	c.	**Select...**
d. Affiliates or subsidiaries?	d.	**Select...**
e. Business strategy or business activities including new products, services, markets, or delivery channels?	e.	**Select...**
f. Branch, Deposit-taking Remote Service Facility, Loan Production Office, or Deposit Production opening/closing?	f.	**Select...**
2. Has the bank had any mergers or acquisitions, or conducted due diligence for any pending, since the LX?		
3. Has the bank experienced significant growth (e.g. average annual growth in TA of 25% or more) since the previous compliance examination?		

4. Does the institution have significantly higher fee income than similar institutions?	
5. Does the institution have a high volume of fee reversals (e.g., late fees, overdraft fees)?	
6. Is the bank in a De Novo status?	
7. Preliminary determination: What is the compliance risk level inherent to the bank's structure?	**Low/Mod/High**
8. **Examiner Summary:** • Summarize pertinent details about the Bank Structure including changes since the previous compliance examination in control, affiliates, branches, strategy, and growth. • Discuss other relevant information (e.g., charter conversion). • Discuss any subsidiary relationships that may present consumer harm risks. • Discuss significant growth rates, higher fee income received, and high volume of fee reversals, as applicable. • Discuss the elements of Bank Structure that present higher risk of consumer harm.	
6T	

Supervisory History	Response	
9. Is there any open DCP enforcement action, including Consent Order, Memorandum of Understanding, Board Resolution or Civil Money Penalty?		
10. Has the bank identified significant issues since the LX involving consumer harm? (describe in Operational Area)		
11. Has a referral to another agency been made as a result of the previous examination?		
12. Were there complaints since the LX:		
a. Received by bank?	a.	**Select...**
b. Reported to CRC?	b.	**Select....**
c. Identified from other sources (e.g., State Attorney General, FTC, complaint boards, internet, BBB)?	c.	**Select...**
13. Were significant violations (i.e., Level 2 or 3) cited at the LX that present potential risk of consumer harm?		
14. Have violations been identified or referrals made outside of the examination process (e.g., HMDA Outlier findings, complaints that turn into violations)?		
15. Has the institution been party to any consumer-related litigation since the LX?		
16. Has the bank been involved in any investigations by other agencies (e.g., DOJ, HUD, FTC, EEOC, or state or local authorities) since the LX?		
17. Did the previous examination and/or visitation activity include recommendations? (describe in Operational Area)		

18. Were significant RMS, BSA, IT, or Trust findings identified at the LX?	
19. Is there any open RMS enforcement action, including Consent Order, Memorandum of Understanding, Board Resolution or Civil Money Penalty?	
20. Do previous RMS examination reports indicate any concerns that may have potential UDAP implications?	
21. Was significant information identified from other sources (e.g., RADD, ViSION, CFPB) that raised compliance concerns?	
22. Preliminary determination: What is the compliance risk level inherent to the bank's supervisory history?	**Low/Mod/High**
23. **Examiner Summary:** • Discuss the Supervisory History including enforcement actions, restitution, referrals, complaints, violations, investigations, or litigation. • Discuss concerns identified in the bank's response to the LX. • Discuss the impact of other examinations to the current compliance examination. • Discuss the elements of Supervisory History that present higher risk of consumer harm.	
6T	

Operational Area: Lending	Response
24. Has the bank introduced any *new* loan products or features (e.g., escrow, PMI, add-ons)?	
25. Has the bank changed loan platforms, software, or core processors since the LX?	
26. Has the bank changed any terms or fees on any loan products since the LX?	
27. Has the bank originated residential consumer loan products since the LX? (If yes, check all that apply) ❒ Fixed rate ❒ Variable rate ❒ Discount/premium initial rates ❒ Non-traditional (e.g., interest-only, negative amortization, prepayment penalties, reverse mortgages, payment option) ❒ HPML ❒ HOEPA ❒ Subprime program ❒ Balloon ❒ Construction ❒ HELOC ❒ Secondary market ❒ Mortgage Broker relationships ❒ Other (describe below)	

6T	
28. Does the bank service residential closed-end consumer loans? (If yes, check applicable) ❒ Small servicer ❒ Large servicer	
29. Has the bank originated non-residential closed-end consumer loans since the LX? (If yes, check all that apply) ❒ Installment ❒ Indirect ❒ Subprime program ❒ Tax refund ❒ Deposit advance ❒ Private Education ❒ Vehicle Title (non-purchase/refinance) ❒ Other (describe below)	**Select...**
6T	
30. Has the bank originated non-residential open-end consumer loans since the LX? (If yes, check all that apply) ❒ Credit cards ❒ Personal line of credit ❒ Overdraft line of credit ❒ Other (describe below)	
6T	
31. Is loan processing decentralized?	
32. Has the bank purchased any loan portfolios?	
33. Does the bank offer PMI?	
34. Does the bank escrow?	
35. Does the bank offer any optional or mandatory services with any loan product?	
36. Is there a significant military presence in or near the institution's trade area?	
37. Has the bank received any relief request under SCRA?	
38. Has the bank suspended, terminated, or lowered the credit limit of any open-end loan since the LX?	
39. Does the bank offer foreclosure/repossession prevention programs or credit repair programs?	

40. Since the LX, has the bank initiated any foreclosure referrals, foreclosure sales, or offered any loss mitigation option to mortgage borrowers (e.g., loan modification, payment forbearance plan, short sale, or deed-in-lieu of foreclosure)?	
41. Does the bank compensate loan officers using bonuses, retirement plans, or other compensation based on mortgage related profits?	
42. Does the bank have any loans secured by property located in a special flood hazard area (SFHA)? (If yes, check all that apply) ❒ Bank escrows flood insurance premiums ❒ Bank has force placed flood insurance	
43. Has the bank been notified of any flood map zone revisions since the LX?	
44. Preliminary determination: What is the compliance risk level inherent to the bank's lending operations?	**Low/Mod/High**
45. **Examiner Summary:** • Discuss the impact of lending-related complaints or recommendations noted in the Supervisory History section. • Discuss the elements of Lending that present higher risk, emphasizing those areas presenting the greatest potential of consumer harm risk.	
6T	

Operational Area: Deposits	**Response**
46. Has the bank introduced any *new* deposit products or features?	
47. Has the bank changed deposit platforms or software since the LX?	
48. Has the bank changed any terms or fees on any deposit products since the LX?	
49. Has the bank offered any of the deposit-related products below since the LX? (If yes, check all that apply) ❒ Rewards checking product ❒ Deposit product with a bonus ❒ Aged-based product with a credit feature ❒ Optional or mandatory services (e.g., identity theft protection, insurance) ❒ Stored value or prepaid debit cards (e.g., gift, travel, payroll)	
50. Has the bank offered an opt-in or opt-out on any deposit product or service since the LX?	
51. Does the bank place holds on any deposits?	
52. Has the bank received any error resolution claims subject to Regulation E?	
53. Does the bank require the consumer to take any additional action	

prior to conducting an investigation of the error resolution claim?	
54. Has the bank denied any error resolution claim or revoked provisional credit previously provided?	
55. Has the bank engaged in any remittance transfers covered by Regulation E outside the safe harbor standards?	
56. Preliminary determination: What is the compliance risk level inherent to the bank's deposit operations?	**Low/Mod/High**
57. **Examiner Summary:** • Discuss the impact of deposit-related complaints or recommendations noted in the Supervisory History section. • Discuss the elements of Deposits that present higher risk, emphasizing those areas presenting the greatest potential of consumer harm risk.	
6T	

Operational Area: Non-Deposit Products	**Response**
58. Does the bank offer Investment Sales? (If yes, check all that apply) ❒ Retail investments ❒ Cash management ❒ Sweep accounts ❒ Foreign retail exchange transactions ❒ Repurchase agreements ❒ Other (describe below)	**Select...**
6T	
59. Does the bank offer Insurance Sales?	
60. Has there been a change in the vendor for Investment or Insurance Sales?	
61. Is the bank a government securities broker or dealer?	
62. Does the bank hold government securities (itself or through a third- party custodian bank) as a fiduciary, custodian, or other capacity for retail customers?	
63. Preliminary determination: What is the compliance risk level inherent to the bank's non-deposit products?	**Low/Mod/High**
64. **Examiner Summary:** • Discuss the impact of NDP-related complaints or recommendations noted in the Supervisory History section. • Discuss the elements of NDPs that present higher risk, emphasizing those areas presenting the greatest potential of consumer harm risk.	
6T	

Operational Area: Third Party Risk	Response
65. Does the bank have any significant third-party relationships (as defined by FIL-44-2008)? (If yes, check all that apply) ❒ New relationship ❒ Involves implementing new bank activities ❒ Material effect on revenue or expenses ❒ Critical functions ❒ Stores, accesses, transmits or performs transactions on sensitive customer information ❒ Markets bank products or services ❒ Provides a product or service involving subprime lending or credit card payment transactions ❒ Poses risks that could significantly affect bank earnings or capital	
66. Does the bank have any third-party deposit collection agreements?	
67. Does the bank have any relationships with third-party payment processors (as defined by FIL-3-2012)?	
68. Preliminary determination: What is the compliance risk level inherent to the bank's third party relationships?	**Low/Mod/High**
69. **Examiner Summary:** • Discuss the impact of any related complaints or recommendations noted in the Supervisory History section. • Discuss the elements of third-party risk that presents higher risk, emphasizing those areas presenting the greatest potential of consumer harm risk.	
6T	

Operational Area: Other Products or Issues	Response
70. Does the institution offer fee-based overdraft services? (If yes, check applicable) ❒ Automated System ❒ Ad Hoc System ❒ Hybrid System	
71. Is the overdraft program administered by a third party?	
72. Does the bank have a Web site? (If yes, check all that apply) ❒ Transactional ❒ Applications accepted online	
73. Does the bank operate a Web site or online service directed to children?	
74. Is the bank involved in social media?	
75. Does the bank offer or participate in any form of mobile banking	

payment product, service, or system?	
76. Does the bank allow customers to receive any account information in electronic format in lieu of a written format?	
77. Does the bank disclose nonpublic personal information to a nonaffiliated third party?	
78. Does the bank, either directly or through a third party, actively market/advertise through print, radio, and/or television?	
79. Does the bank or a third party on its behalf engage in telephone/fax marketing?	
80. Does the bank initiate any email messages for marketing purposes?	
81. Has the bank garnished funds in consumer deposit accounts containing federal benefit payments since the LX?	
82. Does the bank obtain consumer reports on prospective or current employees?	
83. Does the bank provide information to consumer reporting agencies?	
84. Does the bank disclose consumer report information to any of its affiliates?	
85. Has the bank obtained and used prescreened consumer reports to offer preapproved credit?	
86. Has the bank provided any Federal government authority access to the financial records of any consumer since the LX?	
87. Preliminary determination: What is the compliance risk level inherent to the bank's other products or issues?	**Low/Mod/High**
88. **Examiner Summary:** • Discuss the impact of any related complaints or recommendations noted in the Supervisory History section. • Discuss the elements of the Other Products or Issues that present higher risk, emphasizing those areas presenting the greatest potential of consumer harm risk.	
6T	

Operational Area: UDAP	**Response**
89. Does the institution have any consumer complaints that indicate potential UDAP concerns? (If yes, check all that apply) ❒ Misleading or false statements ❒ Missing disclosures or information ❒ Excessive fees ❒ Inability to reach customer service ❒ Previously undisclosed charges ❒ High volume of complaints	
90. Within the review of consumer complaints, has the institution identified trends or patterns that may indicate potential UDAP	

concerns?	
91. Does the institution or its business partners offer or maintain third-party relationships that offer products that exhibit UDAP risk?	
92. Does the institution offer any products that are targeted to any of the following potentially vulnerable audiences? (If yes, check all that apply) ❒ Elderly ❒ Non-English speakers ❒ Financially unsophisticated ❒ Individuals receiving fixed incomes	
93. Since the LX, has the institution collected debts for other parties?	
94. Since the LX, has the institution collected its own debts?	
95. Does the institution maintain a third-party relationship to perform collection services for the bank?	
96. Preliminary determination: What is the UDAP risk level inherent to the bank's products, services, or markets?	**Low/Mod/High**
97. **Examiner Summary:** • Discuss the impact of any related complaints or recommendations noted in the Supervisory History section. • Discuss the elements of UDAP that possibly present a higher risk of consumer harm.	
6T	

SECTION 2 - INITIAL ASSESSMENT OF CMS/INTERNAL CONTROLS

This section includes mitigating factors to inherent risk. "Yes" responses = positive factor.

Board of Directors and Senior Management Oversight	Response
98. Do the Board and management appear to have good comprehension of applicable laws and regulations, including new and recently changed regulations?	
99. Do Board minutes reflect regular and frequent discussions regarding applicable laws and regulations?	
100. Were Board minutes or discussions with management free of any high risk concerns of consumer harm?	
101. Do the Board and management receive training on consumer protection issues, particularly those that may result in consumer harm?	
102. Do the Board and management have sufficient knowledge of any new products or services prior to the implementation of these new activities?	
103. Do the Board and management require the review of	

compensation arrangements for employees and third-party contractors and service providers to ensure they do not create unintended incentives to engage in unfair or deceptive practices, particularly with respect to loan originators and collections?	
104. Has the Board and management implemented and maintained effective risk and supervisory controls to select and manage third-party contractors or service providers, as described in FIL-44-2008?	
105. Based on available information, do the Board and management allocate sufficient resources to the CMS commensurate with the level and complexity of the institution's operations and level of consumer harm risk? (If yes, check all that apply) ❒ Sufficient time and resources for the Compliance Officer(s) ❒ Board-level or other committees that address consumer protection issues ❒ Sufficient resources to detect unfair or deceptive acts or practices ❒ Independent audits (Internal or External) ❒ Compliance consultants	**Select...**
106. Does the Board review and approve bank-wide policies and procedures that address the bank's CMS and applicable consumer protection topics and regulations on at least an annual basis?	
107. Are monitoring and audit results reported to the Board, or a designated committee?	
108. Has management provided sufficient information that appropriate actions have been taken to address deficiencies, findings, and recommendations elevated to their attention via previous examinations, audits, or monitoring, particularly in a way to prevent recurrence?	
109. Has management provided sufficient information to demonstrate UDAP risks are effectively managed?	
110. Has the Board designated a Compliance Officer and/or Compliance committee?	
111. Does the Compliance Officer have knowledge and understanding of consumer protection laws and regulations, particularly those addressing the risk of consumer harm?	
112. Does the Compliance Officer receive periodic consumer compliance-related training?	
113. Does the Board engage compliance or legal representation in the development, marketing, and advertising of any new products or services?	
114. Does the organizational structure include independence for Compliance personnel to cross departmental lines, have access to all areas of the institution's operations, and administer the Compliance program including performing reviews and implementing corrective actions?	

115. Preliminary determination: What is the condition of the bank's Board and senior management oversight?	**Strong/Adequate/Weak**
116. **Examiner Summary:** • Summarize the initial assessment of Board of Directors and Senior Management Oversight. • Discuss undetermined responses and additional actions to be conducted on-site.	
6T	

Compliance Program	**Response**
Policies and Procedures	
117. Does the institution maintain policies and procedures to mitigate inherent risk?	
118. Does the institution maintain a program, policy or procedures to manage their third party risks?	
119. Does the institution have adequate policies and procedures for ensuring compliance with Section 5 of the FTC Act (UDAP)?	
120. Does the bank have adequate procedures to identify active duty servicemembers and their dependents?	
121. Were policies and procedures determined to be sufficient during the previous examination, within audits, or other past assessments?	
122. Are the policies and procedures readily available to all employees?	
123. Has management provided written policies or procedures that include sufficient information and detail necessary to assist employees with completing an applicable transaction?	
124. Does the institution have an effective mechanism in place to review and update policies and procedures when there are changes to the bank's business strategy or regulatory environment?	
125. Does the institution have an effective mechanism in place to communicate amendments to existing policies and procedures or implementation of new ones?	
126. Have written policies and procedures been developed addressing any new or modified laws or regulations that became effective since the previous examination?	
127. Preliminary determination: What is the condition of the bank's policies and procedures?	**Strong/Adequate/Weak**
128. **Examiner Summary:** • Summarize the initial assessment of Policies and Procedures. • Discuss undetermined responses and additional actions to be conducted on-site.	
6T	
Training	

129. Has management established a formalized compliance training program for all employees?	
130. Has management provided sufficient information to determine compliance staff received adequate and timely ongoing training?	
131. Has management provided sufficient information to determine other staff members have received compliance-related training commensurate with their responsibilities?	
132. Has management provided sufficient information to determine the content of the training is appropriate, and employees are assessed periodically to determine the effectiveness of the training?	
133. Is training provided for newly implemented regulations and regulations that have recently changed?	
134. Has management provided sufficient information to determine if significant third-party agreements contain a provision requiring third-party employees receive adequate training?	
135. Does the institution provide comprehensive training to appropriate personnel which covers in detail how to identify and prevent unfair or deceptive acts or practices?	
136. Does management maintain adequate training records?	
137. Preliminary determination: What is the condition of the bank's training?	**Strong/Adequate/Weak**
138. **Examiner Summary:** • Summarize the initial assessment of Training. • Discuss additional actions to be conducted on-site, if applicable.	
6T	
Monitoring	
139. Are compliance monitoring activities currently in place at the bank?	
140. Is monitoring conducted pursuant to an established schedule?	
141. Is independent compliance monitoring conducted for all relevant product types and decision centers?	
142. Does the institution monitor activities of third parties?	
143. Is monitoring conducted at the transaction level?	
144. Is the Compliance Officer sufficiently involved in the bank's monitoring efforts to ensure errors are corrected and do not reoccur?	
145. Does the institution monitor the activities of third parties performing high-risk services for the institution (e.g., collection services)?	
146. Preliminary determination: What is the condition of the bank's monitoring?	**Strong/Adequate/Weak**
147. **Examiner Summary:** • Summarize the initial assessment of Monitoring.	

Discuss additional actions to be conducted on-site, if applicable.	
6T	
Consumer Complaint Response	
148. Does the bank have procedures in place to respond to consumer complaints promptly?	
149. Do complaint procedures clearly identify the staff member or members who are responsible for processing the complaint?	
150. Does the Compliance Officer monitor complaints to identify new, unique, or recurring concerns that may indicate potential risk of consumer harm?	
151. Are complaints reported to the Board?	
152. Did the bank indicate during the pre-examination interview that no consumer complaints have been received?	
153. Did a review of internal and external resources (e.g., STARS, RADD, Ripoff.org, Google) regarding the bank result in no complaints identified?	
154. Have any changes to the bank's policies or procedures been implemented as a result of a complaint or complaints?	
155. Has management provided sufficient information to determine if significant third-party agreements contain a requirement that all consumer complaints are to be provided to the bank for review?	
156. Preliminary determination: What is the condition of the bank's consumer complaint response?	**Strong/Adequate/Weak**
157. **Examiner Summary:** • Summarize the Consumer Complaint Response initial assessment. Discuss additional actions to be conducted on-site, if applicable.	
6T	

Compliance Audit Function	Response
158. Does the Board provide for independent audits?	
159. If internal, are audits conducted by an independent resource?	
160. If external, is the auditor well-versed in current consumer protection laws and regulations?	
161. Has there been no change in auditors since the last exam?	
162. Has management provided sufficient information to determine audits are completed according to a comprehensive and effective risk assessment?	
163. Is the scope approved by the Board or a Compliance Committee?	
164. Does the scope consider the following:	

a. All applicable consumer protection laws and regulations?	a.	**Select...**
b. Adherence to internal policies and procedures?	b.	**Select...**
c. Volume of transactions?	c.	**Select...**
d. Number and type of consumer complaints received?	d.	**Select...**
e. Complexity of products offered?	e.	**Select...**
f. All applicable departments and branches?	f.	**Select...**
g. High risk areas including third-party relationships?	g.	**Select...**
h. Risk factors for each regulation as they relate to consumer harm?	h.	**Select...**
i. UDAP risk?	i.	**Select...**
165. Are audit reports written?		
166. Does the audit report include the following:		
a. Scope of audit?	a.	**Select...**
b. Deficiencies identified?	b.	**Select...**
c. Number of transactions sampled by category or product type?	c.	**Select...**
d. Follow-up to previous audit and/or examination findings?	d.	**Select...**
e. Suggestions for corrective actions?	e.	**Select...**
f. Time frames for correction?	f.	**Select...**
167. Does the institution have a mechanism in place to track the deficiency, cause, and resolution of audit, monitoring, and examination findings?		
168. Did management implement follow-up procedures to verify, at a later date, that the corrective actions were lasting and effective?		
169. Preliminary determination: What is the condition of the bank's compliance audit function?	**Strong/Adequate/Weak**	
170. **Examiner Summary:** • Summarize the initial assessment of the Compliance Audit Function, including the adequacy of review depth and frequency. • Discuss additional actions to be conducted on-site, if applicable.		
6T		

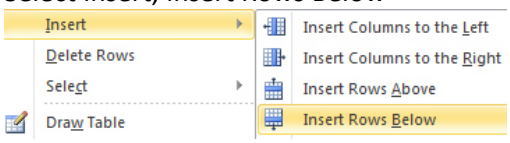
DECISION POINT
Discuss each inherent risk deemed to have been sufficiently mitigated by the strength of the CMS. These areas now exhibit minimal residual risk of consumer harm. Summarize how the CMS elements reduce the inherent risk of each applicable product, service, or market in the comments. **Products, services, or markets not sufficiently mitigated and exhibiting higher levels of residual consumer harm risk will be documented in Section 3 for further analysis and on-site transaction testing.**
6T

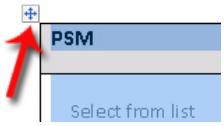
SECTION 3 - SCOPE OF EXAMINATION

This section addresses the residual risk of consumer harm. Complete the table below identifying the specific product, service, or market (PSM) to be examined based on residual consumer harm risk. The table should list the areas in order from highest to lowest relative risk. Risk levels below represent preliminary opinions based on initial assessment performed.

PRODUCT, SERVICE, OR MARKET (PSM) TO BE EXAMINED

PSM	Oversight Risk	Program Risk	Audit Risk	Residual Consumer Harm Risk
1T	**Select…**			
Comments: 3T				

Additional PSMs
Directions for adding additional PSMs: • Right click in the table "Directions for adding additional PSMs" (this table) • Select Insert, Insert Rows Below    • *Note: Click Ctrl and Y keys to add additional tables.* • Hover over the top left corner of the PSM table above   • Select the button on the top-left corner with four arrows (see image below)



- Right click on your mouse and select Copy
- Go to the table(s) below you just created
- Right click in the able and select "Paste Option:" Nest table box or hit Ctrl V (Paste)

You can add as many PSM as needed by following the above procedure.

ADDITIONAL SCOPE INFORMATION

Other Areas for Review

This section may include, but is not limited to, the following:

- Training to be conducted for purpose of meeting trainee benchmarks
- Areas to be confirmed on-site due to lack of information available during PEP
- Any review necessary to validate accuracy of information obtained in PEP
- Home Mortgage Disclosure Act (HMDA) – discuss review conducted or to be conducted on-site

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Community Reinvestment Act (CRA)

If a CRA evaluation is to be performed, this section should include comments related to the scope of this evaluation. This section is generally written in paragraph form and begin with the sentence, "The CRA evaluation will follow (small bank, ISB, or large bank) procedures." Other information may include:

- Description of previous CRA evaluation (e.g., procedures used, rating)
- Which products will be reviewed, what is the review timeframe
- Reason any of the three primary loan products (i.e., RRE, small business, or small farm) are excluded, as applicable
- Description of the sample(s)/universe(s) to be reviewed and comparison data and/or source(s)
- Whether the bank offers a small dollar loan program
- Description of AA(s), any changes since the LX
- If multiple AAs, which will receive full review/limited review and why
- Whether IBBEA is applicable, and if so, what states will be rated
- Description of the AA(s) including any low- or moderate-income CTs or if it is made up of homogeneous CTs
- Discussion of any distressed, underserved, or designated disaster areas within the AA
- Discussion of changes to bank locations/branches
- Bank requested review/consideration of investments/services (small bank)
- Discussion of community contacts

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Miscellaneous Information

This section may include, but is not limited to, the following:

- Benchmark Hours
  - Address whether the EIC's initial determination indicates benchmark hours assigned are appropriate, too low, or too high based upon the residual consumer harm risks identified.
  - Discuss known fair lending risks that may measurably impact examination hours (e.g., history of discriminatory violations, complaints/litigation, open investigations, HMDA outlier identification)

  - If the determination is estimated hours are materially higher or lower than benchmark, provide an estimate of actual hours needed.
- Location of on-site examination and any branch visits to be conducted
- Staff assignments
- Available work hours
- POC name/phone number
- Administrative Issues (e.g., attire, parking, survey completion date, bank's willingness to provide information electronically)
- Indicate if the institution has any mortgage company, payday lending, or private education lending subsidiaries that will require CFPB coordination.

What is the initial determination of benchmark hours based on the residual consumer harm risks identified?	**Too low/appropriate/too high**

6T

Field Supervisor/Designee Approval:

- Field Supervisor/designee will confirm approval by entering name and approval date
- Field Supervisor/designee approval may provide additional comments or notes.

Field Supervisor/Designee Name: 6T

Date of Approval: 6T

6T

SECTION 4 - SCOPE ADDENDUM

(If material changes to the proposed and previously approved scope are necessary, describe those changes below, indicating the date the changes are approved and by whom.)

Examiner Summary:

- The information captured in Sections 1-3 should not be changed after approval by the Field Supervisor or designee.
- If significant information is noted during the on-site review that alters the scope of the examination, summarize that information and the resulting change in this section.
- Include sufficient information to explain the basis for the change and the applicable residual risk of consumer harm.

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Field Supervisor/Designee Approval (Necessary ONLY if Scope Addendum Completed):

- Field Supervisor/designee will confirm approval by entering name and approval date
- Field Supervisor/designee approval may provide additional comments or notes.

Field Supervisor/Designee Name: 6T

Date of Approval: 6T

6T

LENDING

Truth In Lending
Equal Credit Opportunity Act
Fair Housing Act
Home Mortgage Disclosure Act
Flood Insurance
Real Estate Settlement Procedures Act
Homeownership Counseling
Homeowners Protection Act
Helping Families Save Their Homes Act
SAFE Act
Preservation of Consumer Claims and Defenses
Fair Debt Collection Practices Act
Servicemembers Civil Relief Act
Talent Amendment
Consumer Leasing

DEPOSITS

Truth In Savings
Electronic Funds Transfer
Expedited Funds Availability, including Check 21
Part 330 – Deposit Insurance Coverage
Part 360 – Resolution and Receivership Rules

NON-DEPOSIT PRODUCTS

Insurance Sales
Investment Sales/Recordkeeping
Broker/Dealer Rules and Exemptions (Reg R)

OTHER PRODUCTS OR ISSUES

Right to Financial Privacy Act
Privacy of Consumer Financial Information
Fair Credit Reporting Act including FACTA
Children's On-line Privacy Protection
CAN-SPAM
Telephone Consumer Protection
Electronic Banking, including E-Sign
Part 328 - Advertisement of Membership
Part 212 – Garnishment of Accounts Containing Federal Benefit Payments
Community Reinvestment Act
Branch Closings – Section 42
Interstate Banking and Branching
Unfair or Deceptive Acts or Practices