

Restitution Program

EXAMINATION OBJECTIVES

To determine whether the institution has any obligation under the restitution provisions of the Act to reimburse borrowers for understatements of the APR or finance charge disclosure provisions of Regulation Z.

EXAMINATION PROCEDURES

The following procedures are performed as an adjunct to the review for general compliance with the Truth in Lending Act. They only apply if the examiner has identified understated APRs or finance charges in the sample taken as part of the Truth in Lending examination procedures.

1. In connection with the examination procedures conducted under "Truth in Lending," determine whether there is a pattern or practice of APR or finance charge disclosure violations requiring reimbursement.

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2. If there is a pattern or practice of APR or finance charge disclosure violations requiring restitution, estimate the potential dollar amount, and inform the institution of the potential amount and the cause of the problem.

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3. Document findings as appropriate.
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EXAMINER'S SUMMARY, RECOMMENDATIONS, AND COMMENTS

Exam Date:	
Prepared By:	
Reviewed By:	
Docket #:	