

CFPB

Template

Entity Profile

Date Prepared	
Prepared By	
RSSD	
Entity Name	
City	
State	
Prudential and/or State Regulator(s)	
Contact Name	
Contact Information	
Work City	
Work State	
Top Tier Entity	
Affiliated DIs (RSSD)	
Principal products or lines of business	
CFPB Region	
Total Assets (000)	
Assets as-of date	
Attach current Risk Assessment results	
Current Compliance Rating	
Last Compliance Exam Started	
Next Compliance Exam Scheduled	
Current CAMELS	
CAMELS as-of date	
Formal Action in Place	
Formal Action in Process	
Enforcement Attorney Name	
Contact Information	
Informal Agreement in Place	
Informal Agreement in Process	
Safety and Soundness Action(s)	
Fair Lending Issues	
Fair Lending Data Analysis Results	
HMDA Outlier (Y/N)	
Previous Outlier Years	
# Discrimination Complaints	

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Template

Entity Profile

FL Reviewer Name	
Contact Information	
UDAAP Issues	
Other Significant Regulatory Issues	
Complaint Analysis	
Other Noteworthy Information	

CONSUMER RISK ASSESSMENT

CFPB's Risk Assessment process is designed to evaluate on a consistent basis the extent of risk to consumers arising from the activities of a particular supervised entity and to identify the sources of that risk. "Risk to consumers" for the purpose of the CFPB Risk Assessment is the potential for consumers to suffer economic loss or other legally-cognizable injury as a result of a violation of Federal consumer financial law. To determine risk to consumers, the Risk Assessment considers the interaction of two broad sets of factors: the inherent risks in a particular line of business or the entity as a whole and the quality of controls implemented by the entity to manage and mitigate those risks. As noted below, the Risk Assessment will be used during CFPB's supervision planning process to set priorities and focus examination and supervision activities.

Inherent risk includes factors that increase the potential for unfair, deceptive or abusive acts or practices, for discrimination, or for violations of other Federal consumer financial laws. It also includes factors that increase the compliance management challenges of a business and thereby increase the risk of such violations. The quality of risk controls includes factors related to both managing and mitigating specific inherent risks as well as the strength of an entity's overall system of compliance management.

The questions and considerations in this template may be used to conduct risk assessments of individual lines of business, supervised entities as a whole, and groups of affiliated entities when feasible and applicable. Assessments of individual lines of business in large complex entities may be considered together to reach conclusions about the entity as a whole.

The risk assessment is not a determination of whether a violation of law exists.

Using the Risk Assessment Template

The template provides a series of factors that bear on inherent risk and relevant risk controls. Examiners conducting the assessment should rate each relevant factor (low, moderate, or high inherent risk; strong, adequate, or weak risk controls and mitigation), and comment briefly on the basis for each rating and issues to consider during the examination. The factor ratings, taken as a whole, result in the Risk Summary, which is a conclusion about whether the overall risk to consumers is low, moderate, or high. The Risk Summary also includes a judgment about the expected change in the overall risk (decreasing, increasing, or stable/unchanged), and when that direction last changed. The Risk Summary, and the bases for it, will be included with the Examination Report.

The factor ratings and comments should be used to inform the Examination Scope. For example, if the nature and structure of certain products point to high inherent risk and the quality of risk controls is only adequate, then the examination scope should likely include a review of those products and the related compliance controls. The magnitude and severity of potential consumer harm arising from particular risks should be considered when setting priorities for review.

There may be other institution or industry-specific risk factors beyond those included in the template that should be considered when assessing risk to consumers. Examiners should use their knowledge and judgment to identify risks that are unique to a particular entity or its specialized business focus.

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Risk Assessment

The sections below include (1) factors that specifically increase the risk that unfair, deceptive, abusive acts or practices, discrimination, or other violations of Federal consumer financial law will occur and (2) factors that generally increase the difficulty of managing compliance in an organization.

Inherent Risk

Comments in each section should identify any specific factors present in the line of business or entity being assessed, note the potential UDAAP, discrimination, or other regulatory issues to review during an examination, and comment briefly on the basis for the rating assigned to that factor. The rating should reflect the degree of risk.

Nature and Structure of Products	
The profitability of a product is dependent upon penalty fees (e.g., fees for a late payment, for exceeding a credit limit, or for overdrawing deposited funds).	Comments <click and type>
The terms of the product are subject to change at the discretion of the entity, and the entity has frequently made changes in the terms.	
The entity reverses fees at a significantly higher rate than other entities of similar size offering similar products.	
Pricing structure (interest rate, points, fees) and other features and terms are combined in a manner that is likely to make the total costs of the product difficult for consumers to understand.	
Products are bundled in a way that may obscure relative costs.	
Consumers pay penalties to terminate a relationship, including forgoing money or benefits they would otherwise earn.	
Consumers face barriers to information, such as costs to access customer	

CFPB Template

Risk Assessment

service or information about their account.	
Credit decision-makers have wide discretion over setting terms and features of products with inadequate policies and procedures addressing appropriate exercise of that discretion.	
Credit products are not underwritten based upon the likely ability of the consumer to make the required (or, in the case of adjustable rate products, potentially required) payments over the term of the loan.	
RATING – Nature and Structure of Products	<Low, Moderate, High>

Consumers to whom products are marketed	
<p>Consider the extent to which the marketing of a product or service is targeted to particular populations including:</p> <ul style="list-style-type: none"> • Students or young adults • Elderly • Minorities • Immigrants • Consumers of certain national origins • Members of specific religious groups or denominations • Military service members or former service members • Consumers with limited education 	<p>Comments <click and type></p>

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Risk Assessment

<ul style="list-style-type: none">• Consumers with limited English proficiency• Low-income consumers or consumers on limited fixed incomes• Consumers receiving any type of public assistance• Consumers with limited experience with financial products or services• Consumers in or who have recently experienced financial distress• Consumers with low credit scores (e.g., FICO below 620)• Consumers of a certain gender or marital status <p>Products targeted to consumers who fall in multiple categories may be of particular concern.</p> <p>Consider whether any particular populations are missing or excluded from the entity's advertising.</p>	
RATING – Consumers to whom products are marketed	<Low, Moderate, High>

CFPB Template

Risk Assessment

Marketing methods and sales organizations	
<i>Incentives and Compensation</i>	<p>Comments</p> <p><click and type></p>
Incentives encourage the sale of high-cost products regardless of consumer’s request or situation.	
<p>Compensation or performance evaluation of person-to-person sales staff (telephone, face-to-face) is based on:</p> <ul style="list-style-type: none"> • The number of sales made • The size of the sales made (for example, average loan size) or the volume of sales • The price of the product sold or • The particular product sold, <p>without consideration of product outcomes or performance (for example, default or attrition rates, etc.).</p>	
Person-to-person sales staff has discretion to set prices (interest rate, points, fees) with inadequate policies and procedures addressing exercise of that discretion.	
Person-to-person sales staff is not accountable for product outcomes or performance (default rates, attrition rates, etc.).	
<i>Marketing and Advertising</i>	
Marketing materials are not written in a language or at a level understandable by targeted consumers.	
Key product terms or features are not readily available to consumers.	
Targeted consumers would not likely qualify for advertised products or terms.	

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Risk Assessment

Advertising includes teaser rates or low fees with little or no information about important conditions (such as periodic or exit charges).	
Complex products are marketed to consumers not likely to benefit from them or who may likely be harmed by them.	
Product marketing and sales, including branch locations, are targeted in a manner that may be discriminatory.	
Advertising utilizes media outlets targeted to particular populations only to advertise its higher-cost products and not its full range of products.	
RATING – Marketing Methods and Sales Organization	<Low, Moderate, High>

Ongoing customer relationship management	
Employees with customer service responsibilities, including collections, are not evaluated or compensated based on the quality of service or level of customer satisfaction.	Comments <click and type>
The compensation of customer service representatives with discretion to adjust prices or modify other terms is impacted by the frequency and/or size of such adjustments.	
Customer service representatives with discretion to adjust prices or modify other terms operate with inadequate policies and procedures addressing exercise of that discretion.	
Vendors with customer service responsibilities, including collections, are not evaluated based on quality of service or level of customer satisfaction.	

CFPB Template

Risk Assessment

The compensation of vendors that provide customer service representatives with discretion to adjust prices or modify other terms is impacted by the frequency and/or size of such adjustments.	
Vendors that provide customer service representatives with discretion in pricing operate with inadequate policies and procedures addressing exercise of that discretion.	
The number of customer service staff is insufficient to provide timely service.	
Customer service information systems do not have sufficient capacity to support the number of customers.	
RATING – Ongoing customer relationship management	<Low, Moderate, High>

Compliance management challenges	
The entity maintains multiple, discrete un-integrated information systems to originate and service product relationships, including new product relationships with existing customers.	Comments <click and type>
Solicitation is conducted through active cross-selling, outbound telemarketing, or use of third parties for direct marketing.	
The entity uses internet advertising or a wide variety of other mass media.	
The entity has an extensive or decentralized retail network.	

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Risk Assessment

Numerous subsidiaries or affiliates provide consumer financial products and services on behalf of the entity.	
The entity relies heavily on third parties other than subsidiaries or other affiliates to provide products and services to consumers.	
RATING – Compliance Management Challenges	<Low, Moderate, High>

Other factors that point to heightened consumer risk	
<describe factor>	Comments <click and type>
RATING – Other factors	<Low, Moderate, High>

The considerations below bear on both the general quality of an entity’s consumer compliance risk management and specifically on controlling the risks of unfair, deceptive or abusive acts or practices, discrimination, or other violations of Federal consumer financial law. The specific factors indicate strong compliance management.

QUALITY OF CONSUMER COMPLIANCE RISK CONTROLS AND MITIGATION

Comments in each section should identify any factors of concern in the line of business or entity being assessed, note particular compliance management issues to review during an examination, and comment briefly on the basis for the rating assigned to that factor. The rating should reflect the strength of compliance management.

Board of Directors and Management	
<p>The board of directors has adopted comprehensive policies that establish clear standards for compliance with applicable laws, including laws prohibiting unfair, deceptive or abusive acts or practices, and discrimination:</p> <ul style="list-style-type: none"> • Policies and procedures are comprehensive and thorough. • Policies are current and consistent with consumer business activities, and reflect current laws and regulations. • A clear process exists for aligning compliance policies with changing business activities. 	<p>Comments <click and type></p>
<p>Management’s commitment to consumer compliance has been communicated throughout the regulated entity.</p>	
<p>The board and management receive regular and meaningful reporting with respect to consumer protection issues, consumer compliance, or complaints.</p>	
<p>The board and management follow up on a timely basis on issues identified with respect to consumer compliance.</p>	
<p>Management anticipates, plans, and reacts promptly to changes in markets,</p>	

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Risk Assessment

technology, regulations, or consumer need.	
RATING – Board of Directors and Management	<Strong, Adequate, Weak>

Authority and accountability for compliance	
Sufficient resources have been allocated to compliance, including monitoring of compliance throughout the organization and monitoring third parties that perform activities involving consumers.	Comments <click and type>
Management and staff responsible for compliance with consumer protection laws are independent from the business line when appropriate given the size, nature, and complexity of the entity and have clear authority to identify and resolve consumer compliance issues.	
Unit or individual performance expectations include responsibility for compliance.	
Units or individuals have sufficient authority to effect a strong compliance program.	
RATING – Authority and accountability for compliance	

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Risk Assessment

Compliance risk management program and oversight	
The compliance risk management program is well tailored to the size, nature, and complexity of the entity.	Comments <click and type>
The compliance program is independent from the business line when appropriate given the size, nature, and complexity of the entity and provides sufficient oversight of the entity.	
The compliance program provides sufficient oversight of third parties interacting with consumers on behalf of the entity in relation to consumer compliance risk.	
Regular compliance testing is conducted and includes samples of sufficient size covering all relevant product types, decision centers, customer points of contact, and customer communications.	
Compliance testing includes regular and comprehensive self-assessments for compliance with consumer laws and regulations including fair lending.	
The compliance management program promptly addresses issues of potential unfairness, deception, abuse, or discrimination.	
The compliance risk management program includes comprehensive controls and systems to assure prompt and thorough corrective action when problems are found.	
RATING – Compliance risk management program and oversight	

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Risk Assessment

Product and system development and modification	
Consumer compliance risks are considered throughout the product and system lifecycle.	Comments <click and type>
Management and staff responsible for consumer compliance are involved in the product life cycle, including product development and changes, marketing, product delivery, and customer service.	
Possible unfair, deceptive, abusive, or discriminatory effects of product design or delivery are considered and resolved at an early stage.	
Management and staff responsible for consumer compliance are involved in the structuring of incentives, including those for employees and third-party vendors and their employees who interact with consumers.	
RATING – Product and system development and modification	<Strong, Adequate, Weak>

CFPB Template

Risk Assessment

Training	
Appropriate training is provided to all staff, including those responsible for product development, marketing, and customer service and covers consumer protection laws and the obligation to avoid unfair, deceptive, abusive, or discriminatory practices.	Comments <click and type>
Training is timely, repeated as necessary, and tailored to the particular responsibilities of the staff receiving it.	
Training encourages all employees to take responsibility for consumer compliance and to identify and correct issues.	
Policies and procedures and oversight mechanisms are designed to ensure that appropriate and current training is provided to employees of third parties who interact with consumers.	
RATING – Training	<Strong, Adequate, Weak>

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Risk Assessment

Complaint Management	
The entity provides consumers with the opportunity to submit complaints through channels of the customer's choice, including mail, email, or phone.	Comments <click and type>
The entity provides complete and timely responses to complaints received either directly from consumers or indirectly through regulators or other third parties that process complaints.	
Third parties that provide services involving consumers have an established complaint process that is appropriately monitored by the supervised entity.	
The entity tracks all types of complaints.	
The entity actively monitors complaints to identify issues that may require changes in products, procedures, and/or training.	
The entity tracks the time to final resolution of consumer complaints.	
Complaints are resolved without requiring the direction or involvement of executives, regulators, or third parties (such as the Better Business Bureau), or the prospect of litigation or enforcement actions.	
RATING – Complaint Management	<Strong, Adequate, Weak>

Other factors that point to potential lack of controls or mitigation		
<describe factor>	Comments <click and type>	
RATING – Other factors	<Strong, Adequate, Weak>	

<p>Magnitude and Severity of Potential Harm – This factor should be considered when setting priorities for examination activities based on potential risks identified in particular products, lines of business, or the entity overall. Comments should discuss and compare the likely magnitude and severity of potential harm from any identified sources of risk.</p>	
<p>The magnitude and severity of potential harm to consumers will vary based upon the number of consumers who may be directly impacted and the risks identified. For example, a smaller entity, or smaller line of business within an entity, may pose a greater risk to consumers than a larger one if the consumers potentially impacted by the smaller entity or line of business face much larger harmful consequences than those of the larger entity.</p>	<p>Comments <click and type></p>
<p>RATING – Magnitude and Severity of Potential Harm</p>	<p><Low, Moderate, High></p>

Background Considerations – these factors indicate a likelihood of existing weaknesses and may bear on the direction of risk

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Risk Assessment

Supervisory History –Regulatory violations and Matters Requiring Attention identified in previous examinations; consumer compliance rating	Comments <click and type>
Violations involve prohibited kickbacks, discrimination, unfair, deceptive or abusive acts or practices, need for reimbursements, or other harm to consumers.	
Violations are repeated or continuing.	
Violations result from systemic causes.	
Violations and Matters Requiring Attention reflect compliance management weaknesses.	
Consumer compliance rating of 3, 4 or 5.	
RATING – Supervisory History	<Low, Moderate, High>

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Risk Assessment

Consumer complaints		
<p>Numerous complaints from consumers are filed against the entity, or its third-party vendors that interact with consumers, relative to the size of the customer base or in comparison to other entities of similar size offering similar products.</p>	<p>Comments <click and type></p>	
<p>Complaints allege or involve:</p> <ul style="list-style-type: none"> • Misleading or false statements. • Lack of disclosure of information about material terms of a product or service. • Unauthorized fees, fees for services not provided, or duplicative fees. • Previously undisclosed charges. • Customer service. • Loan servicing and collections. 		
<p>Complaints evidence non-compliance with consumer protection laws.</p>		
<p>Complaints raise issues of discrimination.</p>		
<p>Complaints raise issues of potential unfair, deceptive, or abusive acts or practices.</p>		
<p>RATING – Consumer Complaints</p>	<p><Low, Moderate, High></p>	

SUMMARY WORKSHEET		
<i>Use this worksheet for an overall view of the Risk Assessment findings.</i>		
<i>Enter the rating for the different risk factors reviewed on the previous pages and note the priorities for examination review</i>		
Risk Factors	Rating	Review Priorities
INHERENT RISK		<click and type>
Nature and structure of products		
Consumers to whom products are marketed		
Marketing methods and sales organization		
Ongoing customer relationship management		
Complexity of organization		
Other factors		
RISK CONTROLS AND MITIGATION		
Board of directors and management		
Authority and accountability for compliance		
Compliance risk management program and oversight		
Product and system development and modification		

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Risk Assessment

Training		
Complaint management		
Other factors		
Magnitude and severity of potential harm		
BACKGROUND CONSIDERATIONS		
Supervisory history – regulatory violations, Matters Requiring Attention, rating		
Consumer complaints		

RISK ASSESSMENT CONCLUSIONS**Risk Summary**

Supervised entity or line of business reviewed: <click and type>

Element	Current MM/DD/YYYY	Preceding MM/DD/YYYY
Inherent Risk		
Quality of Risk Controls and Mitigation		
Overall Risk to Consumers*		

Expected Change/Direction of Risk	<increasing/decreasing/stable>
Last Change in Direction	< MM/DD/YYYY <increasing/decreasing/stable>

**Overall Risk to Consumers:*

The overall risk is the inherent risk identified in a particular business line or supervised entity, mitigated or amplified by the strength or weakness of the controls to address those risks. The following chart is a general guide to assessing the overall risk to consumers. Examiners must apply their judgment in making this determination; however, a risk controls conclusion of “Weak” should result in an overall risk conclusion that is no more favorable than “Moderate,” even if the degree of risk is concluded to be “Low.”

Overall Risk to Consumers				
		Quality of Risk Controls		
		Strong	Adequate	Weak
Inherent Risk	High	Moderate	High	High
	Moderate	Low	Moderate	High
	Low	Low	Low	Moderate

Summarize the primary bases for the summary conclusions:

<click and type>

**Supervision Plan for
Depository Institutions and Affiliates**

Data Section

Entity Name:

Entity Headquarters City, State:

Entity RSSD No. or Other Identifier (specify if Other):

Affiliated Entity Name(s):

Narrative Section
[boxes will expand]

Institution Profile

Summarize the current Profile of the lead institution and any affiliate(s):
<click and type>

Risk Assessment

Summarize the results of the current Risk Assessment(s):
<click and type>

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Supervision Plan

Supervision Plan

Based on the Profile and Risk Assessment, summarize the plan for supervising the institution and its affiliates. Identify the purpose of particular activities, and note any that require particularly close coordination with Enforcement or Fair Lending.

<click and type>

Priorities: Describe the priorities for CFPB supervision activities, which should relate to the risks present in the institution and its affiliates. Clarifying priorities will assist in scheduling examiner resources.

<click and type>

Monitoring: Describe the plan and timeline for monitoring the institution and affiliates, including any follow-up for Matters Requiring Attention or Enforcement Actions.

<click and type>

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Supervision Plan

Examination(s): Describe the proposed focus, scope, and schedule of examination activities during the year (either in a full examination or a series of limited examinations). Note the location of proposed activities. Include information about coordination with the prudential or state regulator(s), including examination schedule(s) if known. If an examination is not scheduled during the current year, note why.

<click and type>

Examination Resource Requirements: Proposed number of examiners, any special skills or knowledge needed, and projected number of examiner work weeks.

<click and type>

Additional Notes

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Scope Summary

EXAMINATION SCOPE SUMMARY

Name of Supervised Entity:

City, State:

Entity website:

Organization chart (insert or attach as pdf if available)

Number of Open Offices/Branches (including Main Office):

Number of Agents (where applicable):

Total Assets (where applicable) (xx/xx/xxxx) \$

CFPB Docket #

Lead Regional Office:

Regional Office(s) Performing Examination:

Examiner-In-Charge (Current Examination):

Lead Examiner (if applicable):

Examination Team Members:

Name	Role	Specialty
	Enforcement contact	
	Fair Lending contact	

Prudential and/or State Regulator(s):

Regulator Contact(s):

Contact phone #:

Contact email:

Examination Start Date:

Completion Date:

Examination Period:

Anticipated Hours:

Communication Plan: [Who is responsible for communicating with entity? List any expected or scheduled meetings.]

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Scope Summary

COMPLAINTS

Consumer Complaints received by CFPB since the previous examination:

OUTSTANDING ENFORCEMENT ACTIONS

EA Type	Issue Date	Agency	Comments

OUTSTANDING MATTERS REQUIRING ATTENTION

Matter Requiring Attention	Status	Due Date	Required Response	Comments

BREAKDOWN OF LOAN ORIGINATION AND PORTFOLIO

(xx/xx/xxxx – xx/xx/xxxx)

Loan Type	Dollar Volume Originated	% Originated in Portfolio	% of Total Portfolio
Residential Loans			
Consumer Loans			
Small Business Loans			
Other			

Is HMDA Applicable? Y/N (If yes, must consult Fair Lending)

ASSET VOLUME CHANGE

Date:

Total Assets:

Date:

Total Assets:

Source of Information: [Call report? Public filing? Other source? If other, specify]

CFPB Template

Scope Summary

OTHER FINANCIAL INFORMATION (as applicable)

Deposits	Total Deposits: \$	Total Consumer Deposits: \$
Money Transmission	Volume: \$	
Check Cashing	Volume: \$	
Debt Collection	Account Volume: \$	
Other (Add additional lines for areas applicable to the entity being examined)		

ENTITY ASSESSMENT SUMMARY

(Prior to onsite portion of examination.)

Risk Summary: [Copied from Risk Assessment]

Element	Current MM/DD/YYYY	Preceding MM/DD/YYYY
Inherent Risk		
Quality of Risk Controls and Mitigation		
Overall Risk to Consumers		

Expected Change/Direction of Risk	<increasing/decreasing/stable>
Last Change in Direction	< MM/DD/YYYY <increasing/decreasing/stable>

[Narrative description of primary basis for Risk Assessment. Copy from Risk Assessment template.]

CFPB Template

Scope Summary

SCOPE OF THE EXAMINATION

(Completed prior to onsite portion of examination)

[narrative description of related examination activities]

UDAAP

Compliance Management System

Fair Lending Review

Complaints

Indicate the specific regulations that will be subject to transactional testing, noting the relationship with activities in the previous section.

AREA	Review		Comments
	Yes	NA	
LENDING			
Truth In Lending Act			
Real Estate Settlement Procedures Act			
Homeowners Protection Act			
Equal Credit Opportunity Act			
Home Mortgage Disclosure Act			
Fair Credit Reporting Act			
Consumer Leasing Act			
Fair Credit Billing Act			
Home Ownership and Equity Protection Act			
Alternative Mortgage Transaction Parity Act			
S.A.F.E. Mortgage Licensing Act			

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Scope Summary

Fair Debt Collection Practices Act			
Section 626 of the Omnibus Appropriations Act (Mortgage Acts and Practices – Advertising and Mortgage Assistance Relief Services)			

AREA	Review		Comments
	Yes	NA	
DEPOSITS			
Truth In Savings Act			
Electronic Fund Transfer Act			
Disclosure of Lack of Deposit Insurance			

AREA	Review		Comments
	Yes	NA	
PRIVACY			
Sections 502-509 of the Gramm Leach Bliley Act (Privacy provisions, but not information security)			

FINAL SCOPE SUMMARY

Describe changes to the scope of the examination that occurred during the examination, including changes to the Risk Summary.

Note considerations for the scope of the next examination.

General Instructions:

The primary purpose of the report is to communicate examination findings to a supervised entity's board of directors or principals. The report must emphasize significant matters and avoid issues that do not affect or support a rating. Throughout the report, present information under Comments and Supporting Analysis in a well-organized and logical manner. Report comments should be concise, discussing major strengths and/or weaknesses to support the examiners' conclusions. Limit supporting analysis to information that clearly and succinctly demonstrates the conclusions, and avoid including material for informational purposes that does not provide support for the rating or risk assessment.

Plain Language

Reports should follow "plain language" principles:

- *Identify your audience.*
- *Write in active voice (e.g., "identify the doer").*
- *Use strong verbs and the simplest tense possible.*
- *Use simple everyday words except for necessary technical terms.*
- *Avoid jargon, excessive acronyms and abbreviations, multiple negatives, unnecessary qualifiers, and redundancies.*
- *Construct short, concise sentences.*
- *Express parallel ideas in parallel constructions (e.g., the bullets listed here each begin with a verb).*

Definition of Dates used in Examinations

The following definitions ensure accurate and consistent presentation of financial data in the report and consistent records of examination activities. The Federal financial institution regulatory agencies use similar definitions.

Examination (As Of) Date – The date of the data presented in the report. Generally, this is the most recent quarterly information that is available. Significant subsequent events may result in the presentation of more recent data.

Current Examination Start Date (Examination Commenced) – The date the examination activity commenced. For all examinations, use the date that time was first charged to the examination.

Examination Completion Date (Examination Concluded) – The last day of examination activities.

Close (ER Mail) Date – The day that CFPB mails the final report to the entity.

Previous Examination Date – The examination start date of the prior examination.

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Examination Conclusions

Conclusions on the findings of this examination and the results of interim monitoring and reviews.

Scope

<The scope should include a brief explanation of the examination activities undertaken, including, as applicable, the Risk Assessment, reviews for potential violations of Federal consumer financial law (particularly unfair, deceptive or abusive acts or practices, and discrimination), review of the entity's compliance management system, or review of complaints. Identify the products/services and regulatory issues reviewed. Examples of Products/Services Reviewed: [credit cards, mortgage origination, mortgage servicing, private student lending, auto lending, payday lending, unsecured consumer lending, deposit-related, and financial advisory services].>

Click Here and Type**Conclusions and Comments**

<The Conclusion must contain an overall conclusion, followed by a concise summary of the findings. The conclusion should match the tone and language of the rating definition. This section should include summary details or facts supporting the conclusion, including a summary of material deficiencies that support 3, 4, and 5 ratings. The narrative should include both positive and negative conclusions and be concise, constructive, and direct. The narrative comments do not need to cover every area reviewed during an examination. Rather, the comments should focus on those matters that support the overall conclusion and rating. >

Click Here and Type

Risk Assessment *<The results of the final Risk Assessment should be included in this section. A narrative explanation should be provided in the Review and Findings section of the report. The supporting documentation and analysis for the risk assessment findings entered below should be documented in the Risk Assessment template and included in the examination workpapers. The date used for the current examination should be the examination (as of) date. The date used for previous examinations should be the examination (as of) date(s).>*

Examination Report

Element	Current MM/DD/YYYY	Preceding MM/DD/YYYY
Inherent Risk		
Quality of Risk Controls and Mitigation		
Overall Risk to Consumers*		

Expected Change/Direction of Risk	<increasing/decreasing/stable>
Last Change in Direction	< MM/DD/YYYY <increasing/decreasing/stable>

** The inherent risk identified in a particular business line or supervised entity, mitigated or amplified by the strength or weakness of the controls to address those risks.*

Consumer Protection Compliance Rating

<Insert the current examination rating for the regulated entity and choose the correct rating definition below. Ensure that the examination rating is supported in the workpapers and the Final Scope Summary. The procedures for determining the examination rating as well as the definitions for each rating are located in the “Close the Examination” section of the Examination Manual. The dates are the examination start dates.>

	Current Examination	Previous Examinations (if applicable)	
	MM/DD/YYYY	MM/DD/YYYY	MM/DD/YYYY
Compliance Rating			

Examination Report**Docket Number: 1111111**

A supervised entity with this rating [choose appropriate definition language]

“1”

Is in a strong compliance position. Management is capable of and staff is sufficient for effectuating compliance. An effective compliance program, including an efficient system of internal procedures and controls, has been established. Changes in consumer statutes and regulations are promptly reflected in the institution's policies, procedures, and compliance training. The institution provides adequate training for its employees. If any violations are noted, they relate to relatively minor deficiencies in forms or practices that are easily corrected. There is no evidence of discriminatory acts or practices, reimbursable violations, or practices resulting in repeat violations. Violations and deficiencies are promptly corrected by management. As a result, the institution gives no cause for supervisory concern.

“2”

Is in a generally strong compliance position. Management is capable of administering an effective compliance program. Although a system of internal operating procedures and controls has been established to ensure compliance, violations have nonetheless occurred. These violations, however, involve technical aspects of the law or result from oversight on the part of operating personnel. Modification in the institution's compliance program and/or the establishment of additional review/audit procedures may eliminate many of the violations. Compliance training is satisfactory. There is no evidence of discriminatory acts or practices, reimbursable violations, or practices resulting in repeat violations.

“3”

Is in a less than satisfactory compliance position. It is a cause for supervisory concern and requires more than normal supervision to remedy deficiencies. Violations may be numerous. In addition, previously identified practices resulting in violations may remain uncorrected. Overcharges, if present, involve a few consumers and are minimal in amount. There is no evidence of discriminatory acts or practices. Although management may have the ability to effectuate compliance, increased efforts are necessary. The numerous violations discovered are an indication that management has not devoted sufficient time and attention to consumer compliance. Operating procedures and controls have not proven effective and require strengthening. This may be accomplished by, among other things, designating a compliance officer and developing and implementing a comprehensive and effective compliance program. By identifying an institution with marginal compliance early, additional supervisory measures may be employed to eliminate violations and prevent further deterioration in the institution's less-than-satisfactory compliance position.

“4”

Requires close supervisory attention and monitoring to promptly correct the serious compliance problems disclosed. Numerous violations are present. Overcharges, if any, affect a significant number of consumers and involve a substantial amount of money. Often practices resulting in violations and cited at previous examinations remain uncorrected. Discriminatory acts or practices may be in evidence. Clearly, management has not exerted sufficient effort to ensure compliance. Its attitude may indicate a lack of interest in administering an effective compliance program, which may have contributed to the seriousness of the institution's compliance problems. Internal procedures and controls have not proven effective and are seriously deficient. Prompt action on the part of the supervisory agency may enable the institution to correct its deficiencies and improve its compliance position.

“5”

Is in need of the strongest supervisory attention and monitoring. It is substantially in non-compliance with the consumer statutes and regulations. Management has demonstrated its unwillingness or inability to operate within the scope of consumer statutes and regulations. Previous efforts on the part of the regulatory authority to obtain voluntary compliance have been unproductive. Discrimination, substantial overcharges, or practices resulting in serious repeat violations are present.

<The Examiner-in-Charge (EIC) will sign the examination report. If an examiner is acting as the EIC for professional development purposes (EIC in training), a commissioned examiner must review the EIC in training's work and sign the report.>

/s/ <EIC signature>

Examiner-in-Charge

Examination Conclusions

Matters Requiring Attention

Specific expectations and time frames for actions requiring prompt response and corrective action.

<This section should include significant matters requiring prompt board or principal attention and corrective action. There may be corrective actions that do not get incorporated here – these findings are those that require attention from the Board or Principal(s) and a written response to the CFPB. Communicate specific expected actions and time frames. Do not use of the term “should” when you require the board or principal(s) and management to take corrective action; instead, use “must.”>

<Select one of the following paragraphs and delete the other.>

- 1) This examination found no matters requiring a written response from the [board of directors or principals]; however, [the board or principal(s)] is responsible for the adoption and implementation of any corrective actions discussed in other sections of this report.
[or]
- 2) This examination found the following matters that the [board of directors or principals] must specifically address in their written response to this examination report. The [board of directors or principals] is also responsible for the adoption and implementation of any corrective actions discussed in other sections of this report.

<u>Matter Requiring Attention</u>	<u>Due Date</u>	<u>Required Response</u>
Click and Type		•
		•
		•
		•
		•
		•
		•
		•
		•
		•

Review and Findings

Areas or activities examined; violations of law, deficiencies in systems, or other weaknesses identified; and required corrective actions.

Assessment of Risks

Aspects of a supervised entity's products or operations that increase the risk of unfair, deceptive, or abusive acts or practices for discrimination, or for violations of other Federal consumer financial laws (inherent risks).

<The conclusion must contain an overall conclusion about the Inherent Risk findings from the CFPB Risk Assessment and should include summary details or facts supporting the conclusion. Include details supporting the conclusion in the Comments and Supporting Analysis section.>

Conclusion

[Click Here and Type](#)

[Comments and Supporting Analysis](#)

[Click Here and Type](#)

Compliance Management Review

The effectiveness of the supervised entity's strategy for identifying and managing inherent risks and the strength of the entity's overall system of compliance management.

<The conclusion must contain an overall conclusion about the effectiveness of the supervised entity's strategy for identifying and managing the inherent risks to consumers and managing its consumer compliance responsibilities, and summary details or facts supporting the conclusion, including a summary of material deficiencies. Include details supporting the conclusion in the Comments and Supporting Analysis section.>

Conclusion

[Click Here and Type](#)

[Comments and Supporting Analysis](#)

[Click Here and Type](#)

Required Corrective Actions

To address weaknesses in managing risks of potential unfair, deceptive, or abusive acts or practices, discrimination, or other violations of Federal consumer financial law.

<This section identifies specific actions that management must take to resolve supervisory concerns, including specific time frames for completion. If there are no corrective actions for a particular area, just insert "N/A." Actions requiring board or principal attention should also be included in the Matters Requiring Attention section of the report. Include repeat deficiencies as Matters Requiring Board or Principal Attention. Do not include recommendations or ideas for management to consider in the Required Corrective Actions section; they should be provided in the Recommendations section.>

Click Here and Type

Area Reviewed: [insert name or description]

<The area reviewed should include findings for the specific product or service that was reviewed. For example, the area reviewed may be Mortgage Origination. The Conclusion, Comments and Supporting Analysis, and Required Corrective Actions should focus on mortgage origination and any regulatory issues identified for the area reviewed. The conclusion must contain an overall conclusion on the area reviewed and summary details or facts supporting the conclusion, including a summary of material deficiencies. Include details supporting the conclusion in the Comments and Supporting Analysis section. If no deficiencies exist, it should be stated and the Required Corrective Actions section should state "N/A.">

Click Here and Type

Conclusion

Click Here and Type

Comments and Supporting Analysis

<If a regulatory violation is identified, include the citation for the violation, consistent with the format from the Supervision and Examination System.>

Click Here and Type

Required Corrective Actions

<This section identifies specific actions that management must take to resolve supervisory concerns, including specific time frames for completion. If there are no required corrective actions for a particular area, state "N/A". Actions requiring board or principal attention should also be included in the Matters Requiring Attention section of the report. Include repeat deficiencies as Matters Requiring board or principal Attention. Do not include recommendations or ideas for management to consider in the Required Corrective Actions section; they should be provided in the Recommendations section.>

Click Here and Type

Examination Report**Docket Number: 1111111**

Area Reviewed: [insert name or description]

Click Here and Type

Conclusion

Click Here and Type

Comments and Supporting Analysis

Click Here and Type

Required Corrective Actions

Click Here and Type

Recommendation(s)

Suggestions to improve or strengthen currently satisfactory entity practices.

<The section is an optional section to provide recommendations to improve or strengthen entity practices that are currently found to be satisfactory.>

Click Here and Type

Compliance with Enforcement Actions

The status of the supervised entity's compliance with both formal and informal consumer financial protection-related enforcement actions, including any areas of non-compliance or partial compliance.

<This section should be completed if the supervised entity has existing consumer financial protection-related enforcement action(s) in place from CFPB or the entity's prudential regulator. Remove this section from the report if there are no existing or previous consumer financial protection-related enforcement action(s). Use this section to document conclusions and supporting analysis as well as required corrective actions concerning the supervised entity's compliance with formal and informal consumer financial protection-related enforcement actions.>

Conclusion

Click Here and Type

Comments and Supporting Analysis

Click Here and Type

Corrective Actions

Click Here and Type

APPENDIX**Examination Team Members**

<Use this section of the report to identify all examiners who participated in the examination of the regulated entity.>

The following individuals participated in this examination:

Click Here and Type



EXAMINATION REPORT

Examination <Start Date>
Examination Cycle Ending:<Date>
Entity name
City state
CFPB Docket Number: <xxxxxx>

Entity Type: <Depository Institution/DI Affiliate/DI
Subsidiary/Non-Depository>

Examination Type: <Full (10), Limited (11), Target Review(12)
Horizontal Review (15)>

Subordinate and Affiliated Organizations Examined: Click and Type

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Consumer Financial Protection Bureau [use letterhead if available]

<office>Region

[Click and Type Office Name]•[Click and Type Phone Number]• Fax: Click Here and Type Fax Number

[Click and Type Address]

Click Here and Type P.O. Box Address

Click here and type date

[BOARD OF DIRECTORS / Principal(s)]

<Entity name>

<street address>

<city state zip>

Dear [Directors/Principal(s)]:

Pursuant to the authority of the Dodd-Frank Wall Street Reform and Consumer Protection Act, the Consumer Financial Protection Bureau (CFPB) performed a risk-focused examination of <entity name>. The examination began on <Month XX, 20XX>.

The following report summarizes the findings of our examination. Any matters of criticism, violations of laws or regulations, and other matters of concern identified within this Examination Report require the [Board of Directors'/principal's] and management's prompt attention and corrective action.

The comments and conclusions in this report are based on an analysis of information obtained from the entity's records and from other authoritative sources. CFPB prepared this report for supervisory purposes, and you should not consider it an audit report.

<Select one of the following paragraphs and delete the other two paragraphs. If you select the third paragraph, indicate when a reply is due. >

[Please review the entire report at your next meeting and note your review in the minutes of that meeting. *or* Please review the entire report and retain written documentation confirming your review.] You need not prepare or send CFPB a written response to the report.

[Please review the entire report at your next meeting, adopt any corrective actions called for, and note your review and actions in the minutes of that meeting. *or* Please review the entire report, adopt any corrective actions called for, and retain written confirmation confirming your review.] You need not prepare or send CFPB a written response to the report.

[Please review the entire report at your next meeting. Please send us a certified copy of excerpts from your minutes stating that you reviewed the report, *or* Please review the entire report and send us written confirmation of your review,] and advise us of what action you took, or will take, regarding each point discussed in the Matters Requiring Attention section of this report. Please reply within [Click and Type Number of Days] days from the date of this letter.

If you have any questions, please call me at [Click and Type phone number]. If I am unavailable, please call [Click and Type Name and Title of Alternate], at [Click and Type phone number].

/s/

[Click and Type] name title

cc: <prudential regulator>