

# RESCINDED

OCC BULLETIN 2016-15

**Subject: Student Lending**  
**Date: May 9, 2016**

**To: Chief Executive Officers of All National  
Banks and Federal Savings Associations,  
Department and Division Heads, All Examining  
Personnel, and Other Interested Parties**

Replaced - See OCC 2018-48

**Description: New Comptroller's Handbook Booklet**

## Summary

The Office of the Comptroller of the Currency (OCC) issued today the "Student Lending" booklet, a new booklet of the *Comptroller's Handbook*. This booklet is prepared for use by OCC examiners in connection with their examination and supervision of national banks and federal savings associations (collectively, banks) engaged in private student lending. Private student loans are consumer loans offered to borrowers to fund undergraduate, graduate, and other forms of postsecondary education. This booklet addresses the risks in private student lending by banks and in regulatory expectations for safe and sound operations.

This bulletin makes public Chief National Bank Examiner (CNBE) Policy Guidance 2010-2 (REV), "Policy Interpretation: OCC Bulletin 2000-20—Application to Private Student Lending," which was issued to OCC employees only on August 4, 2010. In making this guidance public today, the OCC made minor formatting and typographical adjustments. The policy guidance affirms the applicability of the fundamental principles of the Uniform Retail Credit Classification and Account Management Policy (Retail Classification Policy) to private student lending while recognizing the unique aspects of higher education financing. The policy guidance provides examples of bank practices and policies that generally would be acceptable and consistent with the Retail Classification Policy, including in-school deferment; providing six-month grace and extended grace periods immediately after graduation or withdrawal from school; and loan modifications for long-term hardships.

### Note for Community Banks

The "Student Lending" booklet and CNBE Policy Guidance 2010-2 (REV) apply to examinations of all banks engaged in private student lending activities.

## Highlights

The booklet

- provides guidance to examiners on assessing the quantity of risk associated with private student lending and the quality of student lending risk management.
- provides information on unique aspects of student loans and industry practices.
- highlights the differences between federal student loans and private student loans.

For further information, contact Maribeth Phillips, Retail Credit Risk Specialist, at (202) 649-6670.

Grace E. Dailey  
Senior Deputy Comptroller and Chief National Bank Examiner

**Related Links**

- [“Student Lending” \(PDF\)](#)
- [CNBE Policy Guidance 2010-2 \(REV\) \(PDF\)](#)

RESCINDED