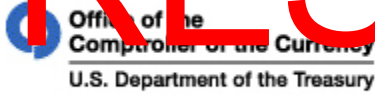


# RESCINDED



OCC BULLETIN 2016-39

**Subject: Consumer Compliance**  
**Date: November 8, 2016**

**To: Chief Executive Officers and Compliance Officers of All National Banks and Federal Savings Associations, Federal Branches and Offices, Department and Division Heads, All Employees, and Other Interested Parties**

Incorporated - Refer to OCC Bulletin 2018-18

Refer also to 81 Fed. Reg. 79473, "Uniform Interagency Consumer Compliance Rating System."

**Description: Revised Uniform Interagency Consumer Compliance Rating System**

## Summary

The Federal Financial Institutions Examination Council (FFIEC)<sup>1</sup> is issuing the revised Uniform Interagency Consumer Compliance Rating System (CC Rating System) to reflect regulatory, supervisory, technological, and market changes since the system was established. The revisions are designed to better reflect current consumer compliance supervisory approaches. The revised CC Rating System is effective for all OCC examinations that start on or after March 31, 2017.<sup>2</sup>

### Note for Community Banks

The revised CC Rating System applies to all national banks and federal savings associations.

## Highlights

- The revisions more fully align the CC Rating System with the FFIEC agencies' risk-based, tailored examination approaches.
- The revised CC Rating System reflects risk-based expectations commensurate with the size, complexity, and risk profile of institutions and incents institutions to prevent, self-identify, and address compliance issues.
- The revisions do not set new or higher supervisory expectations for financial institutions, and their adoption does not represent additional regulatory burden.

## Background

The current CC Rating System, adopted in 1980, is a supervisory policy for evaluating financial institutions' adherence to consumer compliance requirements. The CC Rating System provides a framework for evaluating institutions based on assessment factors to assign a consumer compliance rating to each institution.

## Further Information

Please contact your supervisory office or the OCC's Compliance Policy Division at (202) 649-5470.

Donna M. Murphy  
Deputy Comptroller for Compliance Risk

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<sup>1</sup> FFIEC is comprised of the Board of Governors of the Federal Reserve System, the Consumer Financial Protection Bureau, the Federal Deposit Insurance Corporation, the National Credit Union Administration, the Office of the Comptroller of the Currency, and the State Liaison Committee.

<sup>2</sup> For institutions with continuous target supervisory activities during a 12-month supervisory cycle, this guidance will be applied to supervisory cycles that end on or after March 31, 2017.

<sup>3</sup> The term “financial institutions” is defined in 12 USC 3302(3).

**Related Link**

- [Uniform Interagency Consumer Compliance Rating System \(PDF\)](#)

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