



Dear Valued Subscriber,

We're in the throes of wading through new regulations and adjusting to requirement changes for 2012.

With the implementation of the Consumer Financial Protection Bureau (CFPB), there are CFR citations that have changed. A convenient conversion chart for consumer finance recodification follows this memo. As your manual is updated in 2012, the updated chapters will contain the new citations. We trust that this conversion chart will be a valuable reference for you until all citations have been finalized.

This update to *Risk-Based Compliance Audit Program* provides you with new and updated materials regarding the following:

- The 2012 HOEPA threshold
- The credit scoring information required in adverse action notices and new model forms in Reg B
- Amendments to Reg Z that were effective October 1, 2011
- Foreclosure management practices

Checklists have been updated to reflect these changes. The CD for your manual contains the links to the Electronic Code, which updates on a regular basis.

This update is provided as part of your subscription service to the *Risk-Based Compliance Audit* service; our goal is to provide timely, pertinent updates that will give you the edge in meeting the compliance requirements for your financial institution through a risk-based approach. If you have questions about this update, or suggestions for future updates, please contact me. The best way we can improve our manuals is to be responsive to our readers. To view our complete product line, visit our web site, www.sheshunoff.com.

Sincerely,

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To keep your *Risk-Based Compliance Audit Program* manual up-to-date, please follow the filing instructions.