|  | **Examination Procedures**  [Document supporting evidence noting determinations and findings made] | **Y** | **N** |
| --- | --- | --- | --- |
| **1** | **Coordinate compliance examination activities with other members of the examination team and the examiner-in-charge (EIC). Emphasize identifying violations of law and regulation; integrate those findings with the examination; and conclude on management's compliance with laws and regulations.** |  |  |
| **Examiner Notes:** | | | |
| **2** | **Review and evaluate the adequacy of policies, procedures, and internal controls to ensure the identification of applicable applicants and compliance with the requirements of the FCRA.** |  |  |
| **Examiner Notes:** | | | |
| **3** | **Discuss with management the institution's activities related to collecting, reporting, supplying, and using credit information, and determine whether:  a. The institution uses credit information obtained from credit bureaus or other outside sources in evaluating consumer credit applications; and  b. The institution's activities make it subject to the consumer reporting agency requirements of the FCRA.** |  |  |
| **Examiner Notes:** | | | |
| **4** | **If the institution uses information from credit bureaus or other outside sources in evaluating consumer credit applications, coordinate the testing for compliance with the testing of rejected applications, and determine that the institution makes the disclosures required by FCRA as users of credit information.** |  |  |
| **Examiner Notes:** | | | |
| **5** | **Conclude whether the institution is adequately complying with the FCRA. If not, ascertain whether the conclusion of noncompliance is supported by adequate documentation of the specific noncompliance.** |  |  |
| **Examiner Notes:** | | | |
| **6** | **Utilize discussions with managers, as needed, to gather information and discuss procedures and practices followed by institution personnel to ensure compliance with laws and regulations.** |  |  |
| **Examiner Notes:** | | | |
| **7** | **Discuss items of concern, scope of work performed, and conclusions with the EIC.** |  |  |
| **Examiner Notes:** | | | |
| **8** | **Organize and compile, if necessary, violations of law and regulation into a Violation Summary Sheet.** |  |  |
| **Examiner Notes:** | | | |