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CFPB Examination Procedures for Larger Participants

By L. Richard Fischer, Andrew M. Smith and Jim McCabe

Today, the CFPB released its Examination Procedures for Larger Participants of the Consumer Reporting Market ("Procedures"). The Procedures follow the release of the CFPB’s final rule defining larger participants in the consumer reporting market ("Larger Participant Rule"), which outlines the types of consumer reporting companies and related entities that are subject to CFPB supervision.

In its accompanying press release, the CFPB noted that the Procedures are an extension of the CFPB’s general Supervisory and Examination Manual. This reference appears to reinforce the sentiment of the CFPB’s Larger Participant Rule, which provided that if an entity is designated a larger participant, the CFPB may examine the entire entity for compliance with all federal consumer financial laws, and assess the risks posed to consumers by any activity of the entity, not just the consumer reporting activities that subjected the entity to CFPB supervision.

The CFPB’s authority to supervise larger participants in the consumer reporting market becomes effective on September 30, 2012.

Below are links to the CFPB press release and Procedures:

Press Release


Examination Procedures for Larger Participants of the Consumer Reporting Market


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