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February 22, 2024

To: Clients and Friends

From: Daniel S. Engle

Subject: CFPB Updates Internal Supervisory Appeals Process

In the February 22, 2024 issue of the Federal Register (89 FR 13262, [click here](#)), the Bureau of Consumer Financial Protection (CFPB) announced a revision to their Internal Supervisory Appeals Process. This revision, effective February 22, 2024, updates a process that was originally implemented on October 31, 2012, and later revised on November 3, 2015. The Bureau summarized four main changes in the supervisory appeals process:

- 1) The revised process expands the pool of potential appeals committee members to include any CFPB manager with expertise who did not participate in the underlying matter being appealed.
- 2) The revised process allows for a new option to resolve an appeal: remanding the matter for consideration of a modified finding.
- 3) The revised process allows for institutions to appeal any compliance rating issued to the institution. Previously, an institution could only appeal an “adverse rating.”
- 4) Additional clarifying changes and confirmation that the revised process is effective February 22, 2024.

Further information regarding the Bureau’s update to their Supervisory Appeals Process can be found in the CFPB’s announcement linked above.

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