

FDIC's *Consumer Compliance Supervisory Highlights* – Summer 2025: Consumer Lending*

In July 2025, the FDIC released its *Consumer Compliance Supervisory Highlights* publication (“Highlights”), which provides an overview of its consumer compliance activities and issues identified by examiners in 2024.

During 2024, FDIC consumer compliance examiners found that the most frequently cited regulatory violations (representing approximately 73 percent of the total violations cited in 2024) involved the Truth in Lending Act (TILA) and Regulation Z; the Flood Disaster Protection Act (FDPA); the Truth in Savings Act (TISA) and Regulation DD; the Electronic Fund Transfers Act (EFTA) and Regulation E; and the Home Mortgage Disclosure Act (HMDA) and Regulation C. Notably, this list contains four of the same laws and regulations most frequently cited as violations in the 2024 Highlights, with HMDA replacing the Federal Trade Commission Act as the fifth most cited violation.

The Highlights describe the most frequent violations under each statute and regulation mentioned above. The consumer lending violations are summarized below.

TILA/Regulation Z: The most common violations involved institutions failing to provide required information about the terms and costs of credit. These included issues with periodic statements for open-end credit plans, as required by Section 1026.7(b), and issues with the TRID Loan Estimates and Closing Disclosures required under Sections 1026.37 and 1026.38.

FDPA: The most cited FDPA violation related to institutions' failure to provide flood insurance when required to do so. Adequate flood insurance must be in place at the time a loan secured by a building or mobile home located in a special flood hazard area is made, increased, extended, or renewed.

HMDA/Regulation C: For institutions with HMDA/Regulation C violations, the most common violations involved institutions failing to provide sufficient data for one or more of the required data fields.

The Highlights also provided an overview of consumer complaint trends. The top complaint trends included credit reporting disputes, transaction error discrepancies, and accounts opened without the consumer's knowledge.

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* Janet Bonnefin has retired from the firm.

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