



# TILA Adjustment & Reimbursement Review

## The Need

A Maintenance Fee has been incorrectly disclosed in the FedBox on your contract. Your Truth in Lending Act disclosures are incorrect for hundreds, maybe thousands of transactions. What do you do?

The Truth in Lending Act requires restitution when a disclosure error involves an understated APR or the finance charge exceeds the allowed tolerance. Penalties may result if the error was caused by gross negligence, a willful violation with intent to mislead, or a clear and consistent pattern or practice of violations emerge.

When mistakes have been made, what is a Lender to do? Especially if that Lender is under pressure with a 60-day 'cure' window and thousands of transactions to recast?

## The Solution

Turn to Carleton.

Carleton has 50 years in the Consumer Credit Industry. Our software calculates all different loan types in every state and territory every day of the week. Recasting thousands of transactions in a limited timeframe can only be done by an industry leader with a proven history of processing these difficult calculations. Our process computes reimbursement figures by applying the consensus approach found in the FFIEC's Joint Statement of Policy regarding restitution.

Carleton's loan adjustment and reimbursement analysis computes an accurate adjusted APR and cure sums, if required. Additionally, we can configure the TILA Adjustment & Reimbursement Review to meet your preferred tolerances and objectives. And we will finish in your timeframe with verifiable results!

- Reimbursement Calculations can be configured by:
  - the Lump Sum/Payment Reduction Method
  - the Lump Sum Method
  - a combination of both methods depending upon account status
- Qualifying loans will be cured as of your desired cure date
- Appropriate tolerance levels for the Adjusted APR can be set at different values:
  - 0%
  - 0.125%
  - 0.25%

We will produce a confidential detailed spreadsheet of output results, including the adjusted APR and reimbursement results for each transaction, with more than enough time to implement findings.

To learn more about Carleton's TILA Adjustment & Reimbursement Review, please contact Pete Radike, Director of Client & Channel Engagement at 800-433-0090 Ext. 245 or [PRadike@carletoninc.com](mailto:PRadike@carletoninc.com).