Title: Operations in Rural Areas Under the Truth in Lending Act (Regulation Z); Interim Final Rule RIN: 170-AA59 **Publication Date:** Sec. 1022 (and GIPRA): 1. Universe - Does the analysis assess the costs and benefits to persons identified by the Act, including consumers, covered persons, 1026 covered persons, and consumers in rural areas? Yes. 2. Content - Does the analysis assess the potential loss of access to consumer financial products and services? There is merely a statement – not an assessment. Cost-benefit analysis best practices (based on OMB Circular A-4): 3. Is there a clear statement of the problem the rule is intended to address? No. 4. Does the analysis identify a market failure? No 5. Does the analysis present evidence of a market failure? No. But this a slightly deregulatory rule. 6. Does the analysis define an appropriate baseline? Does it use the baseline consistently? Yes. 7. Does the analysis define an appropriate time horizon? No horizon is discussed. 8. Does the analysis identify a range of regulatory alternatives, including potential alternatives to regulation? What alternatives to regulation were identified (such as additional enforcement)? No. No alternatives to regulation identified – but this is a deregulatory action.

9. Are benefits connected to market failure?

	No – but this is deregulatory.
10.	Does the analysis assess the potential effectiveness of the regulation?
	No.
11.	Does the analysis correctly identify and account for costs, benefits, and transfers for each alternative? Does it explicitly identify and account for impacts on credit access and availability?
	Benefits and costs are identified, and there are some numbers around the potential universe of impacted loans, but no real assessment of impacts.
12.	Are costs, benefits, and transfers quantified for each alternative? Does it explicitly identify and account for impacts on credit access and availability?
	No.
13.	Are costs, benefits, and transfers monetized for each alternative? Does it explicitly identify and account for impacts on credit access and availability?
	No.
14.	Are future costs and benefits discounted to present value using appropriate rates?
	No.
15.	Does the analysis identify key sources of uncertainty?
	No.
16.	Does the analysis conduct sensitivity analyses for sources of uncertainty?
	No.
17.	Was the analysis put out for public comment prior to finalizing?
	Interim Final rule.
18.	The following questions should be included in a thorough evaluation, but are more difficult, time-consuming, and/or less-objective: Is the analysis transparent and reproducible? Is it transparent in its assumptions? Does it rely on the best available science and evidence? Does it comply with data quality standards?