***NOTICE****: The following has been provided by WBA committee and section volunteers for use by member banks.
It should be reviewed and revised as appropriate to the user-bank’s own policies, procedures, and practices.*

**[Bank Name/Logo]**

**Consumer Complaint Procedure**

It is the intent of senior management that all complaints be handled appropriately, in accordance with internal procedures and, if applicable, consumer regulations. [Bank Name] (“Bank”) has established this procedure to ensure that all complaints from customers and non-customers are given prompt, courteous, and fair attention. All branches and departments of the Bank are expected to adhere to the following requirements and handle complaints within a reasonable length of time as outlined in this procedure.

**What is a Complaint?**

Customer and non-customer complaints may come in various forms. Complaints may be oral or in writing, and they may come directly from the customer or non-customer, his or her attorney, or a regulatory agency. A complaint may come in the form of communication from the Better Business Bureau, a grievance sent to the CEO or board chair, or a direct, definite complaint from a customer to bank staff.

A note jotted on a payment coupon or deposit slip is not necessarily a written complaint. To constitute a written complaint, the letter or document should be signed by the customer or non-customer and include an explanation of the issue and a request for a remedy or response. There may be instances when an oral complaint should be further documented as a written complaint. The important thing to remember is – when in doubt, escalate the issue or complaint to the next level.

Any complaint that alleges fair lending violations, discriminatory actions, or violations of law or regulation must be immediately elevated to the compliance officer, chief operations officer, and/or the president/CEO.

*Regulation E Error Resolution is not included in this procedure as there are separate procedures in place specifically addressing Error Resolution under Regulation E.*

**Who is Assigned Responsibility for Complaints?**

The president/CEO has delegated responsibility for oversight of the complaint procedure to the compliance officer who has been given authority to monitor resolution procedures and confer with senior management in order to implement corrective actions as necessary. The compliance officer will determine if an issue addressed in a complaint could recur, what can be done to avoid it, and if training may be necessary.

The compliance officer is responsible for maintaining all written complaints, retaining documentation of the investigation, and a copy of the response letter in a centralized complaint file. Complaints will be reported to the president when they occur and, when deemed appropriate, will be reported to the board of directors.

**Complaint Handling Procedures**

Written Complaint from Attorneys, Regulatory Agencies, or Better Business Bureau:

Typically, a complaint letter from a regulatory agency or an attorney would be sent directly to the president who will refer it to the chief operations officer or compliance officer. However, if a letter of this nature is directed to someone other than the president, the letter is to be date stamped and immediately forwarded along with any supporting documentation to the compliance officer who will determine the course of action to be taken.

Written Customer Complaint:

All written complaints (except those noted in previous paragraph) should be forwarded to the compliance officer. Upon receipt, the compliance officer will designate the appropriate bank officer to review and respond to the complaint.

The following resolution steps are to be taken:

1. The complaint must be reviewed to determine the department affected, the alleged problem or issue, and whether a violation of law or Bank policy exists.
2. A complete investigation should be performed in a timely manner; typically, within 10 days of receipt of the complaint.
3. If the complaint cannot be resolved or responded to within 10 days, a letter must be sent to the complaining party advising that their concerns are being addressed, outlining the steps being taken to resolve the issue, and establishing a timeline for final resolution.
4. A draft of the final response letter which should include a summary of the facts or circumstances of the complaint, the scope of the investigation, and the Bank’s position relating to the complaint, should be sent to the chief operations officer for review prior to being sent to the complaining party. Once approved, the response letter will be subsequently mailed to the complainant.
5. A “Consumer Complaint Report” should be completed by the supervisor conducting the investigation.
6. When resolved, the original complaint letter or correspondence, together with all supporting documentation, and a copy of the response letter and the “Consumer Complaint Report” are to be forwarded to the compliance officer within two business days to be added to the centralized complaint file.

Written “E-Mail” Customer Complaint:

Any feedback received via the Bank’s website or other e-mails will be forwarded to the appropriate department with a copy to the compliance officer as soon as it is reviewed. This type of e-mail must be printed out and will constitute a written complaint which should be handled accordingly.

The Bank’s website provides contact information. Any e-mails containing a complaint which appear to involve discriminatory actions, repeated problems involving a service provided, a bank employee, or a violation of law or regulation, should be treated as a written complaint and handled accordingly.

Oral Customer Complaint:

The employee who talks to the customer or non-customer (the complainant) is primarily responsible for assuring that a response is provided. If that employee believes that they are not the appropriate person to handle the oral complaint, they should refer the matter to their supervisor, an appropriate senior manager, or the compliance officer. In most cases, informal complaints that are not presented in written form may be handled verbally and not entered into the Bank’s complaint file. However, if a response to an oral complaint results in written correspondence to the complainant, the complaint should be treated as a written complaint and these procedures should be followed.

In the event that a senior manager feels that the oral complaint may not be resolved satisfactorily, and may in fact escalate, a “Consumer Complaint Form” should be completed and forwarded to the compliance officer to document the facts of the complaint.

Other Issues:

Comments or suggestions about products or services should also be passed on to management for consideration; for example, comments about 1) lobby or drive-up/walk-up hours, 2) customer parking, 3) ATM/eBanking outages or downtime, and 4) any other comments about bank products, services, hours, or staffing. By reviewing these comments and/or suggestions, bank management can determine patterns or trends that may result in effecting a change that might not have occurred without input from customers, noncustomers, and staff.

Dated: