Entity Name: Prepared by:

NMLS/License Number:       Date:

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Examiners should use this template to evaluate the entity’s compliance management system. The review should cover the items listed below (and detailed on the following pages) that are the common elements of an effective compliance management program.

[I. Compliance Program [#]](#_Toc322683954)

[A. Policies and Procedures [#]](#_Toc322683954)

[A-1. Exam report comment [#]](#_Toc322683954)

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| Examination Procedures – Compliance Program | |
| Examination Procedures - Policies and Procedures | |
| ***To determine the strength, adequacy, or weakness of policies and procedures, examiners should:*** | ***Comments*** |
| Review policies and procedures received with IR 20. | [Click&type] |
| Name and title of individual responsible for overseeing and maintaining update policies and procedures. How often are policies reviewed? Updated? | [Click&type] |
| Review the process on how management addresses new or amended state and federal consumer financial laws and regulations. | [Click&type] |
| Review policies and procedures to determine if all areas are covered. | [Click&type] |
| Review policies and procedures relating to compliance with specific regulatory requirements (such as the privacy of consumer financial information) and their implementing procedures. | [Click&type] |
| Review for outdated content, the names of unaffiliated entities, or other indicators that policies are overly general or not tailored to the needs and actual practices of the supervised entity being examined. | [Click&type] |
| Review policies and procedures designed to ensure that the entity’s service providers comply with legal obligations applicable to the product or service of the examined entity and the provider. | [Click&type] |
| 1. Review process on how policies and procedures are distributed and reviewed with employees? | [Click&type] |
| Review polices for Board approval. May need to review board minutes for documentation on approvals. | [Click&type] |
|  | [Click&type] |
|  | [Click&type] |
|  | [Click&type] |
| **Conclusions - Policies and Procedures** | |
| Draw preliminary conclusions regarding the strength, adequacy, or weakness of policies and procedures. Consider whether policies and procedures:   1. Are consistent with board-approved policies; 2. Address compliance with applicable state and federal consumer financial laws; 3. Are maintained and modified to remain current and to serve as a reference for employees in their day-to-day activities.   Confirm the preliminary conclusions by identifying business units, delivery channels, or offices for transaction testing. Test to confirm that actual practices are consistent with strong or adequate written policies and procedures. Test to determine the impact of apparently weak procedures. | |
| **INSERT COMMENTS FOR USE IN THE EXAMINTION REPORT. COMMENTS SHOULD INCLUDE ANY REQUIRED CORRECTIVE ACTIONS IF DEFICIENCIES ARE FOUND.**  When drafting these comments, use Times New Roman, 12 pt font and justify the right margin. | |