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. Consumer Complaint Response [#]](#_Toc322683954)

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

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| Examination Procedures – Consumer Complaint Response | |
| ***To evaluate the adequacy of the consumer complaint responses, examiners should:*** | ***Comments*** |
| 1. Obtain and review records of recent consumer complaints and inquiries received by the Division about the entity and its service providers. | [Click&type] |
| 1. Review industry or other benchmarking complaint data collected by the Division. | [Click&type] |
| 1. To the extent available, obtain and review records of recent consumer complaints against the institution from:    1. The prudential regulator;    2. Other state regulators;    3. CFPB;    4. State attorneys general; and    5. Private or other industry sources. | [Click&type] |
| 1. Request and review the institution’s policies and procedures for receiving, escalating, and resolving consumer complaints and inquiries. | [Click&type] |
| 1. Request and review the record of consumer complaints and inquiries received by the institution for a specific recent period of time. | [Click&type] |
| 1. Identify complaints alleging deception, unfair treatment, unlawful discrimination, or other significant consumer injury and review some or all of those complaints for handling, timeliness, disposition, and any prospective and retrospective corrective actions. | [Click&type] |
| 1. Determine whether corrective action is offered or taken for any complaint resulting in a conclusion of violation of law or regulation. | [Click&type] |
| 1. Determine whether complaints involving service providers or other third parties referring business to the supervised entity receive prompt and appropriate handling and follow-up by the entity. | [Click&type] |
| 1. If a supervised entity maintains multiple consumer response centers or units, determine whether it employs a common set of best practices as applicable. | [Click&type] |
| 1. Determine whether evaluations of consumer contacts are shared within the supervised entity and included in compliance management reporting to the Board and senior management and whether such information is used in modifying policies, procedures, training, and monitoring. | [Click&type] |
| **Conclusions – Consumer Complaint Response** | |
| Draw preliminary conclusions regarding the strength, adequacy, or weakness of the entity’s response to consumer issues and concerns. Consider whether:   1. Consumer complaints and inquiries are appropriately recorded and categorized; 2. Complaints and inquiries regarding the entity or its service providers are addressed and resolved promptly; 3. Complaints that raise legal issues involving potential consumer harm from unfair treatment or discrimination, or other regulatory compliance issues, are appropriately escalated; 4. Complaint data and individual cases drive adjustments to business practices as appropriate; 5. Consumer complaints result in retrospective corrective action when appropriate; and 6. Weaknesses in the compliance management system exist, based on the nature or number of substantive complaints from consumers.   Confirm the preliminary conclusions by identifying business conduct areas, specific regulations, or organizational units for more detailed review. | |
| [Click&type] | |
| **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. | |