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. Training [#]](#_Toc322683954)

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

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|  Examination Procedures – Compliance Program |
| Examination Procedures - Training |
| ***To evaluate the quality of the entity’s compliance training program, examiners should:*** | ***Comments*** |
| Request and review the schedule, record of completion, and materials for recent compliance training of board members and executive officers. | [Click&type] |
| Determine the involvement of compliance officer(s) in selecting, reviewing, or delivering training content. | [Click&type] |
| Request and review policies, standards, schedules, and records of completion for compliance-specific training of compliance professionals, managers, and staff, and documents demonstrating that service providers who have consumer contact or compliance responsibilities are appropriately trained. | [Click&type] |
| Request and review samples of the content of training materials and comprehension tests, including training related to new regulatory requirements, new products or channels of distribution, and marketing (including scripts). | [Click&type] |
| Request and review training developed as a result of management commitments to address monitoring, audit, or examination findings and recommendations or issues raised in consumer complaints and inquiries. | [Click&type] |
| Determine whether the program is designed to provide training about the specific regulatory requirements relevant to the functions of particular positions. | [Click&type] |
| Review records of follow-up, escalation, and enforcement for units with training completion rates that do not meet the supervised entity’s standards or deadlines.  | [Click&type] |
| 1. Request and review the supervised entity’s plans for additions, deletions, or modifications to compliance training over the next 12 months and any plans for changes to the overall training resources and compare actual training activities to prior plans.
 | [Click&type] |
| **Conclusions - Training** |
| Draw preliminary conclusions about the strength, adequacy, or weakness of the compliance training program. Consider whether:1. Compliance training is current, complete, directed to appropriate individuals based on their roles;
2. Training is effective, and commensurate with the size of the entity and nature and risks to consumers presented by its activities;
3. Training is consistent with policies and procedures and designed to reinforce those policies and procedures; and
4. Compliance professionals have access to training that is necessary to administer a compliance program.

Confirm the preliminary conclusions through a risk-focused review of the compliance training program. |
| **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.  |