

DOCUMENT REQUEST - COMPLIANCE REVIEWS –
MANAGEMENT REVISED JANUARY 2017

Please prepare the Summary of Information items. Electronic format is preferred.

(PE) – to be provided Pre-Exam (A) - to be available upon Arrival

INFORMATION REQUEST – COMPLIANCE REVIEWS -- MANAGEMENT			
	P	A	General Information and Oversight (by Board of Directors, Senior Management, and/or Principals)
1	X		Provide the name, title, e-mail address and telephone number of the officer who is the principal contact for specific information about the credit union’s Compliance Management System (CMS).
2	X		Provide a current list of the credit union's senior officers, identified by name and title. Note which ones are new in their position(s) since the previous safety and soundness exam.
3	X		Provide a list of the credit union’s location and branch office addresses by city, county, and state. Note if any offices are new or if any were closed during the last 12 months.
4	X		Provide a list of the credit union’s affiliates and subsidiaries by city, county and state. Identify whether they are active or inactive. Also, identify third-party partners or service providers.
5	X		Describe the credit union’s procedures for collecting and disseminating compliance-related information and any amendments to these compliance procedures.
6	X		Provide the name of the credit union’s data processor(s).
			Document Requests – General Information and Oversight
7	X		Provide board of directors and management meetings minutes that cover the past 12 months, for meeting that address CMS, fair lending, and other compliance matters.
8	X		Provide minutes for the audit committee and any other compliance-related committee. Include a list of committee members during the previous 12 months.
9	X		Provide minutes of the credit committee and the pricing committee for the past 12 months, include compliance-related materials or exhibits referred to in the minutes.
10	X		Provide a copy of the credit union’s mission statement, business plan (for the current year), and its strategic plan.

	P	A	Compliance Program
11	X		Provide a list of all staff members, in addition to the compliance officer, who have compliance responsibilities. Provide their names, positions, and assigned compliance responsibilities (e.g., regulations assigned, functional or geographical area, etc.).
12		X	Provide a list of the credit union’s compliance resources, including reference material, such as subscriptions to a monthly compliance newsletter or to a compliance website, and access to various trade associations and outside consulting compliance information services.
13		X	Describe the credit union’s review process to ensure that compliance related policies and procedures reflect current statutory and regulatory requirements. Indicate any reviews performed or changes made to these policies and procedures during the last 12 months.

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Document Requests – Compliance Program			
14	X		Provide written compliance program, procedures, or manuals, including those related to fair lending. If compliance-related procedures are incorporated into general operational and administrative procedures, provide an index or outline of compliance topics covered in the general procedures. Include any alternative or supplementary guidance (i.e. desk procedures or systems support manuals) for compliance.
15	X		Provide position descriptions and résumés of all persons having compliance related responsibilities (include those individuals who work in subsidiaries or operating divisions who perform compliance services for the credit union).

Training			
16	X		Describe the compliance training requirements for all staff, management, and board members.
17	X		Describe the board and management’s monitoring of staff training. Indicate whether such monitoring is recorded in the board or management meeting minutes.
18	X		Provide the name and location of the business of any outside consultant or other organization that is used for compliance training.
19	X		Describe the training and/or other compliance-related professional development attended by management and staff who have had compliance responsibilities during the last 12 months.
Document Request – Training			
20		X	Provide training manuals and other training information related to compliance laws and regulations used for training during the last 12 months.
21		X	Provide training records, including dates, participants, participants’ test results and the topics covered. Include information on training related to new statutory or regulatory changes. Provide this information for all management and staff with compliance responsibilities.

Internal Monitoring			
22	X		Describe any compliance monitoring processes, including fair lending compliance monitoring (do not include information on compliance audits conducted by outside entities). Include information on daily, weekly, or monthly quality control processes, internal assessments, loan and/or loan denial reviews, deposit analyses, product or services quality reviews, and branch reviews.
Document Request – Internal Monitoring			
23	X		Provide a list of compliance area self-assessments and quality control reviews conducted during the last 12 months, including fair lending self-assessments.
24	X		Provide reports of quality control reviews related to consumer compliance rules and regulations and assessments that were drafted and issued during the last 12 months. Include reports related to fair lending compliance. Also, include checklists used and a schedule of the frequency of such reviews for loan, deposit, or other products or services.
25			Provide reports of branch, subsidiary and affiliate reviews relating to compliance matters..

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		X	
26		X	Provide monitoring reports related to the discretion used in loan underwriting, pricing, or product selection; and exception and override reports.

	PE	A	Consumer Complaint Response
27	X		Describe the credit union’s system of taking complaints from its members. Include information on: <ul style="list-style-type: none"> a. the various channels (e.g., through DCU, phone, Internet, or mail) that can be used for making a complaint, b. the process for tracking complaints from receipt thru resolution, and c. any third-party (partner or servicer) who participates in the credit union’s complaint resolution process.
28		X	Detail the number of complaints received by the credit union (or its third-party service partners or providers) during the past 12 months and provide any analysis of the complaints data that was conducted.
29		X	Provide details on all complaints received by the credit union (or its third-party service partners or providers) which allege discrimination or unfair, deceptive or abusive treatment regarding the credit union’s products or services during the past 12 months. Include the number of such complaints, categorized by alleged discrimination or alleged unfair, deceptive or abusive treatment.
30	X		Describe all open consumer-protection or fair lending related litigation, claims, judgments, and assessments in which the credit union is or is likely to become involved.
31	X		Describe any resolved consumer-protection or fair lending related litigation during the last 12 months.
32		X	Describe any investigations by government agencies such as the Department of Justice, the Department of Housing and Urban Development, the Equal Employment Opportunity Commission, or any other federal, state or local agency in which the credit union has been involved during. Provide information on the outcomes of these investigations, as applicable.
Document Request - Consumer Complaint Response			
33	X		Provide copies of the consumer complaint processing policies and/or procedures, including management review for satisfactory complaint resolution.
34		X	Provide a report that lists any policy, procedure or operational change that resulted from consumer complaint processing during the past 12 months.

	PE	A	Periodic Independent Testing and Audits (Internal and External)
35	X		Detail the board of directors and/or management’s requirements for periodic compliance audits, including fair lending audits, both internal and external. Include information on the timing requirements for compliance audits and for reporting requirements to the board. If such audits are conducted by an outside consultant, provide the name of the consultant and the principal representative of the outside consultant, its business location, and the frequency of the audits that were performed

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			on the credit union.
36	X		Describe the board and management’s monitoring of compliance audit exceptions and for the satisfactory correction of the audit exceptions. Include whether such monitoring has been documented in meeting minutes.
			Document Request - Periodic Independent Testing and Audits (Internal and External)
37	X		Provide the credit union’s internal and external audit procedures, and its risk assessment plans.
38	X		Provide copies of reports for all the compliance audit testing that was completed during the previous 12 months.
39		X	Provide examiners with access to all the compliance audit work papers for audits completed during the last 12 months.
40	X		Provide audit schedules for the previous 12 months and for the upcoming 12 months.
41	X		Provide follow-up reports on audit exceptions and the corrective actions taken by the credit union to address any audit exceptions and findings.

	PE	A	Third Party Service Providers
42	X		Describe any relationships the credit union has with third party service providers, including service providers involved in the following areas: <ul style="list-style-type: none"> a. escrow services b. broker arrangements c. investor agreements d. payroll card arrangements e. credit or pre-paid card affinity or issuing agreements (whether or not the receivables are on the credit union’s books) f. transaction processing, or g. dealer paper agreements.
43	X		Provide a description of the oversight and review mechanisms used to evaluate the associated risks (reputation, compliance, consumer harm, monetary, transaction) related to these third-party agreements.
44	X		Provide a description of any arrangements with third parties to provide products or services to customers, directly on behalf of the credit union or through a referral arrangement, including arrangements regarding fees or other compensation. Include a description of any compliance or fair lending oversight, training, or assistance provided by the credit union to the third parties.
45	X		Describe any system changes or conversions in information systems that were performed during the previous 12 months and the steps taken by management to ensure the new information system changes will help foster compliance with the consumer protection laws
46			Describe the credit union’s plans for system changes and/or conversions to be

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	X		performed in the near future (1 year).
			Document Request - Third Party Service Providers
47		X	Provide the contracts and agreements with the third parties who perform compliance reviews, internal audits, and loan quality control reviews for the credit union. Additionally, provide access to the examiners so they can review the work papers and the copies of the reports from these reviews. This information should be provided/access given for third party audits and reviews performed during the past 12 months.
48		X	Provide records of due-diligence performed prior to hiring the third parties.
49	X		Provide reports of any third-party risk assessments performed during the past 12 months.
50	X		Provide compliance policies and procedures regarding the oversight and management of third-party arrangements.
51		X	Provide records which show the testing of information systems that pertain to the handling of compliance related matters.

	PE	A	Product Development and Business Acquisitions
52	X		Describe any pre-implementation planning procedures for any new consumer financial products introduced during the previous 12 months.
53	X		If the credit union has acquired any significant assets or liabilities (e.g., loan portfolios, servicing rights, or other assets or deposits) from other entities, provide details on the types of assets and liabilities acquired and the sources of who sold the assets or liabilities acquired.
54	X		Describe procedures for ensuring that the credit union addresses compliance issues and risks from acquisitions whether of another credit union, a branch office, or a loan portfolio, etc..
			Document Review - Product Development and Business Acquisitions
55		X	Provide records showing the credit union's review of new products or services for compliance risks, including records of any reviews done by legal counsel. Include records relating to the reviews for fair lending compliance risk.

	PE	A	Other
56	X		Provide the name and titles of the credit union personnel who can be contacted about the credit union's marketing program.
57		X	Provide marketing-related materials, including, marketing and advertising budgets.
58	X		Provide the credit union's written marketing and advertising policies, if applicable, and access to the credit union's advertising file, including:

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			<ul style="list-style-type: none">a. Newspaper advertisementsb. Radio or TV scriptsc. Lobby brochuresd. Statement stufferse. Internet advertisements (including social media like Facebook, Twitter)f. Other forms of advertising
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Additional information may be requested throughout the compliance examination