



Compliance Management Program Self-Assessment

Business Name:

Date:

Completed By:

Factors should be evaluated commensurate with the size, complexity and risk profile of the business including third-party relationships.

Assessment Categories and Factors		Rating		
Board (or other governing body) and Management Oversight Factors		Strong	Satisfactory	Weak
Oversight and Commitment	<p>Board and management provide oversight, resources and attention to the compliance management system.</p> <p><i>Rating Considerations:</i> Compliance responsibility designated (ex. Risk, audit or other management committee) or other parties. Board and management receive reporting on compliance matters; meeting minutes show review and coverage of compliance matters. Written Compliance Program adopted by board or committee. Board or committee has input on compliance audit scope, issues noted and resolution. Board or committee receive reporting about identified compliance issues and resolution completed.</p>			
Oversight and Commitment	<p>Compliance resources including systems, capital and personnel commensurate with the business' size, complexity and risk profile are provided to ensure the business is in compliance with laws and regulations.</p> <p><i>Rating Considerations:</i> Compliance staff appointed (Compliance Officer, other). Compliance budget established. Compliance automated systems utilized and other compliance resources available.</p>			
Oversight and Commitment	<p>Staff is knowledgeable and empowered and held accountable for compliance with consumer laws and regulations.</p> <p><i>Rating Considerations:</i> Policies and procedures include staff responsibility for compliance. Compliance staff independent and have access to board or other governing body. Compliance staff competent and knowledgeable and provided ongoing training.</p>			
Oversight and Commitment	<p>Due diligence and oversight of third-party providers is conducted to ensure business complies with laws and regulations.</p> <p><i>Rating Considerations:</i> Policy or Procedures in place for oversight of third-party providers and due diligence reviews. Staff assigned responsibility for due diligence review of third parties. Reviews documented and reported to management or board. Contracts with third-party providers state expectations about provider compliance with laws and regulations and consequences for compliance violations.</p>			

Oversight and Commitment	<p>Oversight of third-party provider’s policies, procedures, controls and training is conducted to ensure oversight of compliance responsibilities.</p> <p><u>Rating Considerations:</u> <i>Policy or Procedures in place for ongoing review of third-party provider’s policies, procedures, controls and training.</i> <i>Staff assigned responsibility for ongoing review and oversight of third parties.</i> <i>Reviews current and reported to management or board.</i> <i>Internal controls or monitoring are established of third-party provider activities.</i> <i>Action is taken to fully address problems identified through the monitoring of third-party activities.</i></p>			
Change Management	<p>Management anticipates, monitors, and responds timely to changes in applicable laws and regulations, market conditions, and products and services offered by evaluating the change and implementing responses across impacted lines of the business.</p> <p><u>Rating Considerations:</u> <i>Methods in place to identify new regulatory requirements or changes.</i></p>			
Change Management	<p>Management conducts due diligence in advance of product changes, considers the entire life cycle of a product or service in implementing the change, and reviews the change after implementation to determine that actions taken have achieved planned results.</p> <p><u>Rating Considerations:</u> <i>Methods, policies or procedures in place for development and implementation of new products and services including compliance function participation.</i> <i>Methods, policies or procedures in place to test changes after change is implemented.</i></p>			
Risk Management	<p>Management comprehends and identifies compliance risks including emerging risks in products, services and other activities of the business.</p> <p><u>Rating Considerations:</u> <i>Higher risk areas are identified and overseen (included policies, procedures, audit, monitoring).</i></p>			
Risk Management	<p>Management manages risks and conducts risk self-assessments.</p> <p><u>Rating Considerations:</u> <i>Risk assessments are conducted (ex. compliance risk, information security, enterprise-wide risk).</i> <i>Risk assessments or reports provided to and discussed with board.</i></p>			
Corrective Action and Self Identification	<p>Management identifies issues and responds to compliance deficiencies and any other violations of law or regulations, including remediation, in the normal course of business.</p> <p><u>Rating Considerations:</u> <i>Internal quality control and compliance monitoring are in place to identify risks and issues.</i> <i>Internal or external audits are conducted to identify risks and issues.</i> <i>Issues and intended responses are reported to board and management.</i> <i>Issues and intended responses are tracked and monitored for completion.</i> <i>Issues are addressed in timely manner.</i></p>			

Overall Board and Management Oversight Rating Comments: <i>[summarize factor strengths and areas to improve]</i>				
Compliance Program Factors		Strong	Satisfactory	Weak
Policies and Procedures	<p>Compliance policies and procedures and third-party relationship management programs provide standards and are comprehensive to effectively manage compliance risks in products, services and business activities.</p> <p><u>Rating Considerations:</u> Policies and procedures are documented. (Common compliance policies and procedures cover the Compliance Program, Information Security/Privacy, Equal Credit Opportunity Act/Fair Lending, Fair Credit Reporting Act, Anti-Money Laundering, Truth In Lending Act, Servicemember Civil Relief Act, Unfair, Deceptive, Abusive Acts or Practice, Third Party Management, Account Servicing and Collection). Policies and procedures are comprehensive and cover full scope of products and services offered and related compliance laws and regulations. Policies and procedures are maintained and modified to remain current and complete, including for changed laws and regulations.</p>			
Training	<p>Compliance training is comprehensive, timely and specifically tailored to particular responsibilities of the staff receiving it.</p> <p><u>Rating Considerations:</u> Training is provided to all staff, management and board, as applicable to role. Training is consistent with established policies and procedures. Training is conducted at appropriate frequency (i.e. regularly, per planned schedule). Compliance staff assists in selecting, reviewing or delivery of training. Training material records are maintained and attendance is tracked and monitored. Compliance staff have access to training necessary to administer the compliance program.</p>			
Training	<p>Compliance training is updated proactively in advance of the introduction of new products or new laws and regulations to ensure that all staff are aware of compliance responsibilities before implementation.</p> <p><u>Rating Considerations:</u> Training is timely provided, prior to changes. Training is provided in response to audit, exam, or compliance issues.</p>			
Monitoring and Audit	<p>Compliance monitoring practices, management information systems, reporting, compliance audit and internal control systems are comprehensive, timely and identify and measure material compliance risks throughout the business.</p> <p><u>Rating Considerations:</u> Designated audit function reviews compliance with laws and regulations and internal policies and procedures and is independent of the compliance and business functions and reports findings and results management and board. Designated compliance function monitors compliance with laws and regulations and internal compliance policies and procedures and is independent of the business functions and reports findings and results to management and board/committee. Monitoring and audit documentation and reports are maintained.</p>			

Monitoring and Audit	<p>Products and services are monitored proactively to identify procedural or training weaknesses to preclude regulatory violations. Needed modifications are made expeditiously to minimize compliance risk.</p> <p><u>Rating Considerations:</u> Compliance monitoring and audit functions consider the results of risk assessments to prioritize and determine compliance review and audit scope and frequency. A compliance monitoring and audit schedule is established and adhered to, generally annually.</p>			
Complaint Response	<p>Process and procedures are in place to identify, investigate, and respond to complaints promptly and thoroughly.</p> <p><u>Rating Considerations:</u> Written policy and procedures are in place to identify, investigate, respond to, log and report complaints promptly and reasonably. Compliance staff or other party designated to oversee complaint process. Complaint investigations and responses are thorough and within established timeframes and guidelines. Complaint records and responses are maintained. An escalation process is in place for substantial complaints (ex., legal, regulatory).</p>			
Complaint Response	<p>Management monitors complaints to identify risks of potential consumer harm, violations of law and customer services issues, and takes appropriate action.</p> <p><u>Rating Considerations:</u> Complaints are reported to and reviewed by management and board regularly. Corrective action is determined and tracked to completion by management.</p>			
Violations of Law and Consumer Harm	<p>The Compliance Management System is assisting in self-identification and correction of violations of law. Violations of law that may have occurred, if any, were not the result of major weaknesses in the compliance management system, caused minimal impact to consumers, and occurred over limited period of time and were isolated in number.</p>			
	Overall Compliance Program Rating:			
Overall Compliance Program Rating Comments: <i>[summarize factor strengths and areas to improve]</i>				
Compliance Management System Self-Assessment Action Plan: <i>[summarize areas for follow up, assign responsibility, set timeline]</i>				