

SCP Real Time Compliance for Non-Delegated Lenders includes a complete Federal and State policy guide, compliance training, and ongoing monthly support services which provides a Non-Delegated with the necessary support to create a culture of compliance.

SCP Real Time Compliance for Non-Delegated includes:

POLICY GUIDES

Development

The Federal Policy Guide will include applicable Federal Consumer Protection Regulations as they relate to a Non-Delegated Lender's business practices. These policies will be updated on a monthly basis as a result of SCP's ongoing monitoring of nationwide audits, enforcement actions, and other regulatory activities.

The State Policy Guide will include all applicable regulations for a Non-Delegated Lender's primary state. One State Policy Guide is included. Additional State Policy Guides can be purchased at an added fee of \$40 per month.

Delivery

Once completed, policy guides will be posted online on a secure website, and can be accessible by an unlimited amount of employees.

TRAINING

SCP Real Time Compliance for Non-Delegated Lenders includes online training and testing on the rules and regulations established and enforced by the Consumer Financial Protection Bureau ("CFPB") concerning Federal Mortgage Compliance, including but not limited to Fair Lending, AML, TILA, RESPA, HPA, FCRA/FACT, GLB, Patriot Act, Do Not Call, ECOA, MAPs and the SAFE Act, etc.

All online compliance courses which have been written and vetted by compliance professionals, attorneys and education specialists. Courses are delivered as a SCORM compliant course through our online training center. Each course will be approximately 30 – 45 minutes and will include an exam at the end of the course.

SCP Developed Compliance Course Curriculum

- Advertising Compliance
- Anti-Money Laundering (AML)
- ATR and QM
- Equal Credit Opportunity Act — Regulation B
- Ethics in Lending
- Fair and Accurate Credit Transactions Act (FACTA) and Fair Credit Reporting Act (FCRA) Overview
- Fair Lending Overview
- Gramm-Leach-Bliley (GLB) Privacy Act
- Home Mortgage Disclosure Act — Regulation C
- The Homeowners Protection Act (HPA)
- Initial Disclosures
- Mortgage Acts and Practices – Advertising
- Real Estate Settlement Procedures Act (RESPA) — Regulation X
- Red Flags Rule
- S.A.F.E. Mortgage Licensing Act – Regulation H – State Compliance and Bureau Registration System
- Servicemembers Civil Relief Act (SCRA)
- Security and Consumer Privacy Protection
- Truth in Lending Act — Regulation Z
- TILA RESPA Integrated Disclosure
- Unfair Abusive, Deceptive Act and Practices — UDAAP

Course Exams

All courses include an end-of-course exam. Employees must complete the entire course and pass the end-of-course exam with a minimum 70% passing score to confirm they have completed the course. Employees are allowed to review the course material and re-take an exam as many times as necessary.

Course Length

Most courses are approximately 45-60 minutes in length. Courses do not have to be completed in one session. The system will automatically record where the student left off and allow them to start at that section when they log back into their account. Courses are not timed and do not have to be completed within any certain timeframe.

Training Administrator Account

Each client is provided with one administrator account. The administrator receives instructions on how to utilize the Admin features including; adding new staff, rolling out new courses, and running reports.

Employee Account

Each employee is assigned their own employee account which they use to login to the training portal. The administrator is able to view which courses the staff member has completed and the results of their exams. Employee training accounts may be licensed for a \$10 one time per employee fee.

WEBINARS

SCP Real Time Compliance for Non-Delegated Lenders includes periodic webinars to assist you with compliance. All webinars will be recorded and placed into the administrator account for viewing and playback.

COMPLIANCE COACH SUPPORT SERVICES

With Real Time Compliance for Non-Delegated Lenders, clients receive 30 minutes of support per month from a SCP Compliance Management Consultant. Within those 30 minutes per month, the same SCP Consultant can help you implement your policies, prepare for an audit, and/or assist with other compliance matters or general questions. Additional support time can be purchased for \$185 per hour.

FEE ARRANGEMENT

SCP Real Time Compliance for Non-Delegated Lenders is based on a 12 month schedule.

\$ 499 set-up fee

\$ 520 per month

\$ 10 per employee one-time fee for training

Additional State Policy Guides can be purchased for \$40 per month.