



# CFPB Compliance Agent Self-Assessment

Where are you and your agency with the Best Practices?  
Take our Self-Assessment to find out if you are on the road to  
Best Practices compliance.

1. Are all Commitment and Policy signers licensed title agents? Who are your authorized policy signatories, and have they completed a Personal Information Sheet and submitted a copy of their license?
2. Have you obtained the ALTA Policy forms licensing? Are you renewing it annually?
3. Has the company instituted written procedures and controls for its escrow accounts? Do your employees know what they are, and can you provide a copy?
4. Does the company provide electronic verification of its reconciliation of the escrow account? If so, what platform is used and can you provide an example?
5. Is your Escrow account identified as either an “escrow” or “trust” with the bank?
6. Is there a procedure in place to ensure that only authorized employees have access to bank transactions? What process do you have in place?
7. Is there a procedure in place to immediately remove any terminated or former employees? Who is in charge of that process?
8. Are all of your escrow accounts maintained in a Federally Insured Financial Institution?
9. Are you completing background checks during the hiring process, and every three years on all employees who have access to escrow funds?
10. What is your process for ongoing training for employees regarding the proper management of escrow funds and escrow accounting?
11. Does the company maintain a written privacy and records retention policy? Is this information provided to each customer at the time of closing?
12. Is access to files containing personal information and social security numbers limited to employees who have undergone Background and Credit checks? How are those files physically secured?
13. Do you currently have a policy that restricts the use of removable data (i.e. flash drives, computer disks)? How do you restrict its use?

14. How do you secure your computers, mobile devices and Company Information Technology?
15. Are all computers password protected, does your company use strong passwords (8+characters including numbers, symbols, upper & lower case) and require frequent password updates?
16. Is your company using multi-factor authentication?
17. When emailing documents, does your company transmit non-public personal information via password protected attachments or other secure connections?
18. How do you dispose of non-public personal information?
19. If outside service providers are used, have you verified their Privacy and Records Retention Policies?
20. In the event of a security breach, do you have a written policy in place to notify your customers of the potential compromise of personal information?
21. Do you have regular training on Fraud Prevention, CyberSecurity, WireFraud and Business Email Compromise? Do you have written procedures or a Rapid Response Plan if a diversion of funds occurs?
22. Do you have a written Disaster Recovery plan, and are your employees aware of it? Do they know who is to initiate the plan in each department? Can you produce a copy for review?
23. Are there operational controls in place to ensure the accurate preparation of Settlement Statements, and file processing? Can you tell me about your processes?
24. Are there guidelines in place to ensure that all documents are recorded within two business days of closing? On average, how long after closing does it take your company?
25. Do you have a method of tracking all documents that are sent for recording? Are those documents sent via express overnight delivery?
26. What is your process for handling recording items that may have been rejected by the recorder's office for non-compliance or fee shortages? Who tracks that process, and is there a written procedure in place for new employees?
27. Are you using our rate manual and online rate calculator to calculate rates? Is there a process in place to ensure that all employees are trained on the proper method of rate calculation, and distribute updates when rates are changed?
28. Is there a post closing audit conducted to ensure that the proper fees were charged for rates, recordings, and miscellaneous fees? When there is an overage, is there a refund provided to the customer?
29. How long after closing a transaction does it take your company to deliver title policies to customers? What is your procedure for monitoring the timely preparation and submission of final title policies to your customers?
30. Does your company remit title premiums to your underwriter by the last day of the month following the month in which the insured transaction was closed?
31. How much errors and omission insurance does your company have?
32. Does your company carry any other professional liability insurance (fidelity bonds, surety bonds, cybercrime)?
33. Does your company have a written policy in place to respond to consumer complaints, and is there a designated individual to handle those complaints? What is the typical response time to consumer complaints?
34. How often does your company update your Best Practices Procedures or 'tests' the written standards?
35. How is your company monitoring ongoing training for Best Practices compliance or education in general?

# CFPB Compliance Summary

Category	Items of Particular Notation	Pass/Fail
Licensing Requirements		
Escrow Controls		
Electronic Reconciliations		
Privacy and Records Retention		
Settlement Procedures/Policies		
Title Policy Production		
Delivery & Reporting of Policies		
E&O and Fidelity Coverage		
Consumer Complaints		
Training Logs		