DEPARTMENT OF
SAVINGS AND
MORTGAGE LENDING
HECTOR RETTA, COMMISSIONER

Summary of Preliminary Findings

Date:

Examiner:

Mortgage Company Name:
Mortgage Company NMLS ID:
Qualifying Individual:
Qualifying Individual NMLS ID:
Mortgage Company Address:

POLICIES AND PROCEDURES

Advertising / Social Media Policy:
Personnel Administration / Employee Policies:
Compensation Agreements:
Remote Work Policy:
Includes safeguards to protect consumer data, information, and records including use of secure virtual private networks and data storage encryption where applicable?
Includes appropriate risk-based monitoring and oversight processes?
Information systems monitored for potential anomalies or security incidents?
Ensures electronic records are secured and physical records are not maintained at a remote location?
Information security awareness (remote work) training provided to all employees as part of initial training and annually?

Information Security Program / Safeguards Rule:
Designates a qualified individual to coordinate the Plan? Name and contact information of the person?
Performs risk assessment that identifies and assesses internal and external risks to confidentiality, security, and integrity of consumer information? If 5,000 or more consumers, written risk assessment requirements met?

Designs and implements safeguards to control risks identified through the risk assessment including:
Access controls
Data identification, classification, and asset management
Encryption
Secure development practices
Multi-factor authentication
Data disposal practices
Change management procedures
User activity logging and monitoring

Tests and monitors key controls identified through risk assessment? If 5,000 or more consumers, are penetration tests and vulnerability assessments performed?
Documents the selection and oversight measures to ensure that service providers safeguard information? Performs periodic assessment of service providers?
Details policies and procedures for secure destruction and disposal of records?
Information security awareness training provided to all employees as part of initial training and annually? Specialized training provided to Qualified Individual and key personnel?

Provides for periodic updating to reflect changes in risks? If 5,000 or more consumers, updates to reflect results of penetration test and vulnerability assessment?

If 5,000 or more consumers, written incident response plan developed?

If 5,000 or more consumers, annual report provided by qualified individual to the Board or senior staff?

Identity Theft Prevention Program / Red Flags Rule:
Tailored appropriately to size and complexity of company?
Identifies relevant patterns, practices and forms of red flags?
Incorporates business practices to detect red flags?
Details responses to red flags to prevent and mitigate identify theft?
Provides for periodic updating to reflect changes in risks?

Anti-Money Laundering Program:
Details policies, procedures & internal controls?
Designates compliance officer?
Provides for appropriate ongoing training of personnel?
Provides for independent testing to confirm adequacy & compliance?
Includes procedures for filing electronic SARs when required?

LOAN REVIEW

Review Period:
Loan Sample:

PRELIMINARY FINDINGS

Previous Examination

Date:

Rating:

Repeat Violations:

TX SML Examination Ratings

1 - Strong Compliance Position
2 - Satisfactory Compliance Position
3 - Less than Satisfactory Compliance Position
4 - Close Supervisory Attention and Monitoring to Correct Serious Compliance Problems
5 - Substantially Noncompliant. Strong Supervisory Attention and Monitoring