

CFPB Appendix for PPMS Training

	CFPB General Considerations for Examinations		PPMS Element and Form	Additional Information for Appendix	Supplemental Information
1	Org Charts and process flowchart		Element 1 - Required Form Management Review Checklist	As part of setting up the first Element and preparing for Certification, your company will create or update a number of Organizational Charts and Process Flowcharts. You do not need special software for this, but larger companies could benefit from charting expertise.	
2	Board Minutes, annual reports, or the equivalent available		Element 1 - Required Form Management Review Checklist	If your company isn't taking annual Board Minutes, or want to provide a more practical report to the regulators, the Management Review Checklist will present a comprehensive annual report.	Include Board Minutes addressing your Compliance Management System, debt collection practices and other compliance matters.
3	Relevant management reporting		Element 1 - Required Form Management Review Checklist	The Management Review Checklist is a Required Form as part of PPMS and will present a comprehensive report to regulators.	Keep a current list of the company's directors and senior offices, indentified by name and title.
4	Policies and procedures		Element 4 - PPMS Manual	Regulators will want to see written documentation, not simply hear what you say you are training or doing in your office. PPMS will direct and instruct your company through a complete and comprehensive documenting process.	Describe your Compliance Programs including the resources available, reviews to ensure policies, procedures, scripts and other documents reflect current statutory and regulatory requirements.
5	Notes and disclosures		Element 8 - Process Control	Your company will have a variety of needs met by PPMS for documenting what happens in your office at every level.	
6	Telephone recordings		Element 14 - Management of Records	Record retention for all types of data are covered in Element 14 and your company will create complete procedure on retaining all records.	
7	Operating checklists, worksheets and review documents		Element 4 - PPMS Manual	Your company will create a complete manual that includes numerous checklists and instructions. The Manual will provide a significant amount of information for regulators reviewing your company's internal procedures for every procedure.	
8	Monitoring procedures		Element 11 - Non-Conformance Forms and Log	Required as part of PPMS is the Non-Conformance, Corrective-Action procedure. This is one of the primary aspects of PPMS at the heart of your company's management system and will provide regulators significant data on your monitoring of procedures in your company.	Provide reports of quality control reviews related to consumer compliance rules and regulations and assessments performed. Include reports related to telephone recording, monitoring, and quality assurance program.
9	Compensation policies				Document collector and compliance personnel disciplinary and compensation policies.

10	Relevant computer program and system details		Element 18	Your company's chart of IS and IT for Element 18 will have system diagrams and charts and should provide significant information for this General Consideration.	List all databases used by the company regarding the collection and reporting of debt. Include a diagram of how the databases work with other systems.
11	Consumer files, including original loan documents, and payment records systems		Element 4 & 14	The PPMS Manual will be your guide for documenting your internal procedures found under Element 4. Element 14 will detail how you handle client data and records, payment records and systems in a written procedure.	
12	Historical examination information				
13	Audit and compliance reports, and management responses to findings		Element 15 - Internal Audit Checklist	Your company will conduct annual audits for each Element as part of Certification and Surveillance under PPMS. Providing the Internal Audit Checklist, a Required Form, should demonstrate to a Regulator your audits conducted each year.	Document timing requirements for compliance audits and on reporting requirements to the board.
14	Training programs and materials		Element 16 & Element 12 - Training Forms and Logs; Continuous Improvements from Corrective Actions	PPMS will have your company documenting all of your training session for all your employees and create a concise training log. Your company will also be able to provide Regulators with your Corrective Actions taken on any or all non-conformances in a comprehensive log with detailed forms.	
15	Scripts for employee use		Element 8	Process Control in your PPMS can have documentation for collector scripts or suggested talking points.	
16	Third-party contracts and oversight materials, including monitoring reports and findings		Element 5 or 14	All vendor contracts and relationships can be managed under Element 5 (Purchasing) or under Element 14 (Management of Records/Data). Your company will choose the way you want to handle these contracts and which Element to use, but either way you will have what the Regulators are looking for in an easy-to-find document(s).	Address due diligence process in selecting vendors.
17	Written correspondence with consumers		Element 8 or 4	You can have all of your notices or notice recorded as part of Element 8 (Process Control) or Element 4 (Document & Data Control). This can be regularly reviewed and then provided to regulators as needed.	Include all review of written responses related to consumer disputes.
18	Court documents				Policies to determine when an account is litigation eligible, documents required before it is determined to file suit, policy on determining statute of limitation period, and description of attorney network if utilized.

19	Consumer complaints and disputes, including those submitted to CFPB Consumer Response Center, Consumer Sentinel, the BBB, or other sources as appropriate				See Element 4 /8 - Documented internal process for tracking complaints including expected response time and written communications sent to consumers addressing complaints. Reports analyzing complaint data
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