THE MH ASPECT™SYSTEM

As a result of the most sweeping regulatory changes in recent memory, the profit margin of many financial institutions continues to be squeezed. However, when it comes to compliance with the new regulatory regime, failure for a financial institution is not an option. This scenario places some financial institutions between the metaphorical "rock and a hard place." Perhaps, the answer to this dilemma is finding a means to "do more, with less." Maddin Hauser has developed ASPECTTM (Advanced Scripts and Procedures for Efficient Compliance Testing) — a system for meeting this challenge by creating enhanced compliance testing scripts with methods for flexibly applying those scripts to meet client objectives and budgets.

These testing scripts are designed to assist Maddin Hauser in advising its clients on policies and procedures relating to Compliance Management Systems, origination, and servicing and incorporate the latest regulations, authorities, guidance, and years of practical experience in working with regulators and representing clients in the mortgage industry. The range of application of ASPECT™, along with a sample script excerpt, is set forth below.

	Comprehensive	Maddin Hauser can conduct a full independent review of the Bank's policies and procedures, training	Pr. No.	CFPB Assessment	Enhanced Review Assessment
	Independent Review	materials, management interviews, practices, and	1.0	(A) Fair Credit Reporting Act Furnisher Requirements	(A) Fair Credit Reporting Act Furnisher Requirements
	Keview	targeted loan file testing. Our enhanced testing scripts incorporate the latest regulations and guidance.	2.0	*Each furnisher must establish and implement reasonable written policies and procedures regarding the accuracy and integrity of the information relating to consumers that it furnishes to a consumer reporting agency.	Confirm the servicer established P&P's to ensure a borrower's account information is furnished to a credit reporting agency with accuracy and integrity.
			2.0	The policies and procedures must be appropriate to the nature, size, complexity, and scope of each furnisher's activities.	The policies and procedures must be appropriate to the nature, size, complexity, and scope of each servicer's activities.
	Collaborative Review	Maddin Hauser can collaborate with in-house compliance teams on a targeted basis to supplement	1.0	Consideration of Bureau Guidelines in drafting policies and procedures	Consideration of Bureau Guidelines in drafting policies and procedures
	Noview	its internal compliance team's work toward completing a comprehensive review.	1.0		Consideration of Bureau Guidelines in drafting policies and procedures
		a comprehensive review.	2.0		Do the servicers FCRA policies and procedures reflect that the servicer considered the CFPB's guidelines in developing those policies and procedures? 12 CFR 1022 42(a)-(b)
	File Review	Maddin Hauser can conduct loan file reviews (both origination and servicing) in targeted compliance areas	3.0		Do the servicers FCRA policies and procedures incorporate the CFPB's guideline where appropriate? 24 CFR 1022.42(a)-(b)
	(i.e., origination, servicing transfers, default servicing, modifications, etc.) .	4.0		Do the servicers FCRA policies and procedures reflect that the servicer considered the following factors: (i) in types of business activities in which the servicer engages; (ii) the nature and requency of the information the servicer provides to consumer reporting agencies; and	
	Policy and Procedure	Maddin Hauser can review and analyze existing written policies and procedures and provide recommended revisions where appropriate.			(iii) the technology used by the servicer to turnsh information to consumer reporting agencies? 12 CFR 1022, Appendix E, Sec. I. (a)(1)-(3).
	Review	темыйны жиете арргорнате.	1.0	Policy Objectives	Policy Objectives 12 CFR 1022, Appendix E, Sec. L(b)
			2.0		Are the servicer's policies and procedures reasonably designed to promote the objectives of turnishing information about accounts or other relationships with a consumer that is accurate, such that the furnished information:
	Compliance Management System Review	Evaluation of Compliance Management Systems. Under this option, Maddin Hauser would assist in evaluating compliance with the CFPB's requirements for implementation of Compliance Management Systems,			(i) Identifies the appropriate consumer, (ii) Reflects the terms of and liability for those accounts or other relationships, and (iii) Reflects the consumer's performance an other conduct with respect to the account or other relationship. 12 CFR 1022, Appendix E Sec. I.(b)(1)
		including assisting in conducting management			
		interviews and evaluating response procedures.	3.0		Are the servicer's policies and procedures reasonably designed to promote the

These are just some of the options for structuring Maddin Hauser's services to best fit a financial institution's compliance needs, avoid duplication of effort, and control costs. Because when it comes to compliance, we know that neither failure, nor "bankruptcy" in achieving compliance are options, Maddin Hauser, and its ASPECT™ system, stand ready to find the right combination of compliance and cost to meet your institution's needs.