|  | **Examination Procedures**[Document supporting evidence noting determinations and findings made] | **Y** | **N** |
| --- | --- | --- | --- |
| **1** | **Review and evaluate the adequacy of the institution's policies, procedures, practices, and internal controls to ensure compliance with the requirements of the GLB Act. Determine whether the institution's internal review process tests for compliance in these areas. If it does not, or if the review indicated areas of weakness, complete the following steps as necessary to determine compliance with the GLB Act.** |  |  |
| **Examiner Notes:** |
| **2** | **Evaluate management information systems, including the use of technology for monitoring, exception reports, and standardization of forms and procedures.** |  |  |
| **Examiner Notes:** |
| **3** | **Determine frequency and effectiveness of monitoring procedures. Does the licensee have mortgage loan originators or employees who work remotely from their residence? Does the company have procedures in place to address this situation?** |  |  |
| **Examiner Notes:** |
| **4** | **Evaluate adequacy and regularity of the institution’s training program.** |  |  |
| **Examiner Notes:** |
| **5** | **Determine whether the compliance audit program provides for ensuring customer information:*** **the procedures address all regulatory provisions as applicable;**
* **the work is accurate and comprehensive with respect to the institution’s information sharing practices;**
* **the frequency is appropriate;**
* **conclusions are appropriately reached and presented to responsible parties; and**
* **steps are taken to correct deficiencies and to follow-up on previously identified deficiencies.**
 |  |  |
| **Examiner Notes:** |
| **6** | **Determine knowledge level of management and personnel of the GLB.** |  |  |
| **Examiner Notes:** |
| **7** | **Discuss items of concern, scope of work performed, and conclusions with the EIC.** |  |  |
| **Examiner Notes:** |
| **8** | **Organize and compile, if necessary, violations of law and regulation into a Violation Summary Sheet.** |  |  |
| **Examiner Notes:** |