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| **Policies and Procedures** |
| **Licensing** |

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| **Purpose** | To document mandated insurance licenses and corporate registrations (as applicable) so that Ratified Title Group, is able to remain in good standing with each state(s) in which it conducts business. |
| **Scope** | These policies and procedures are for all of Ratified Title Group (hereafter referred to as “The Company”) locations including all satellite offices. These procedures are to be followed by all employees and independent contractors where applicable. |
| **Procedures** | Licensing  The Company maintains active agency (business entity) licenses as well as agent (employee, owner, producer, notary) licenses. When necessary, the Company also maintains active non-resident state licenses.  The following people are licensed in accordance with state specific regulations:   * Persons who give rate quotes * Persons who discuss coverage and exceptions * Persons who make underwriting decisions * Persons who sign commitments * Persons who sign policies   A tracking report (attached) is maintained by Jennifer Bradford as a monitoring control and periodically reviewed by Thomas Bradford, owner to help ensure the appropriate business professionals are licensed and renewed when necessary.  Licensed individuals, along with their active licenses, have been communicated to each underwriter. The underwriter is notified when a license becomes inactive.  Licensed individuals maintain the necessary continuing education requirements including any necessary ethics requirements. Documentation is maintained to evidence the requirements have been met.  The Company maintains and has on file the appropriate American Land Title Association Policy Forms License. |

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| **Contact Officer** | *John Wood -Owner -CEO* |
| **Date Approved** | *January 2019* |
| **Date of Commencement** | *January 2019* |
| **Amendment Dates** | *N/A* |
| **Date for Next Review** | *January 2019* |
| **Related References and Links** | * *Licenses monitored and managed by Kendra Raley* |

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| **Policies and Procedures** |
| **Document Recordation / Title & Settlement Pricing** |

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| **Purpose** | Document recordation and rate/pricing procedures and policies to assist Ratified Title Group in compliance with applicable contractual obligations and Federal and State Consumer Financial Laws. |
| **Scope** | These policies and procedures are for all of Ratified Title Group (hereafter referred to as “The Company”) locations including all satellite offices. These procedures are to be followed by all employees and independent contractors where applicable. |
| **Procedures** | **Pricing Procedures**  **The Company utilizes rate manuals and online calculators, as appropriate to ensure correct fees are being charged for title insurance policy premiums, state-specific fees and endorsements.**  Employees are aware of contractual and statutory rate and pricing requirements.  Title insurance policy premiums, state specific fees and endorsements are calculated in accordance with the title insurance underwriter or regulatory or promulgated rate manual through The Company’s software and/or through the use of title insurance underwriter rate calculators. All applicable rate discounts, such as Simultaneous Issue, Reissue, Refinance, and Substitution rates are calculated in accordance with the requirements in the rate manual.  When rate change bulletins are received, the owner and/or office manager will communicate these rate changes to the appropriate parties and will test the accuracy of such changes and report the results to Company Management.  Throughout the year a representative sample of closed files is subject to a post-closing review to conclude if fees were correctly charged.  **Recording Procedures**  **Submit or ship documents for recording to the county recorder (or equivalent) or the person or entity responsible for recording within 2 business days of settlement**.  After review of county specific recording requirements documents are submitted for recordation by a title abstractor. When available and economically feasible, document recordation will be processed electronically via E-recording. When E-recordings cannot be utilized or are not available and when The Company does not utilize an employee, documents will be shipped for recording. The Company ships documents Federal Express, tracks all packages and maintains tracking information.  **Timely responses to recording rejections and verify recording is filed of record.**  The Company monitors a Recording Log for all recordings. After documents are sent for recordation, The Company maintains contact with the appropriate personnel and parties to resolve any problems. The Company refers to the Recording Log for information about outstanding recordings and rejected recordings, status and resolution. After documents are recorded, detailed information such as book, page, instrument number, time and date are included in the transaction file. |
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| **Contact Officer** | | *John Wood, Owner - CEO* | |
| **Date Approved** | | *January 2019* | |
| **Date of Commencement** | | *January 2019* | |
| **Amendment Dates** | | *N/A* | |
| **Date for Next Review** | | *January 2020* | |
| **Related References and Links** | | * *Each employee has their own rate manual and access to an online rate calculator.* | |

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| **Policies and Procedures** |
| **Professional Liability Insurance** |

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| **Purpose** | Document procedures for review of professional liability coverage (errors and omissions insurance, fidelity and surety bond) and so that Ratified Title Group has financial capacity to cover its professional services obligations. |
| **Scope** | These policies and procedures are for all of Ratified Title Group (hereafter referred to as “The Company”) locations including all satellite offices. These procedures are to be followed by all employees and independent contractors where applicable. |
| **Procedures** | The Company is required by state licensing law to maintain errors and omissions insurance, fidelity and surety bonds. Kendra Raley, Operations Manager is responsible for tracking and renewing each of these insurance coverages. The Company furnishes copies of all the insurance policies and applicable bonds to their title underwriter(s), including all endorsements, and proof of payment of the current premium.  Professional Liability Insurance Coverage - Errors and Omissions  The Company carries professional liability insurance for errors and omissions in accordance with The Company’s contractual obligations in the amount of at least $1,000,000 issued by The CIMA Companies, Inc., a company acceptable to our title insurance underwriter. This comprehensive liability policy has a deductible of no more than $5000 per loss. A copy of most current policy is attached.  Fidelity Bond Coverage  Fidelity coverage is required by state law. The Company carries fidelity coverage of $200,000 issued by Travelers Casualty & Surety Co of America. A copy of most current bond is attached.  When requested by the customer or required by state regulation, the Company will issue an insurer’s Closing Protection Letter (CPL) in connection with the settlement funds and issuance of a title insurance policy. This CPL will be issued via the insurer’s automated Closing Protection Letter system. When required by state regulation the Company will set aside funds in a statutory indemnity fund to cover fidelity losses not otherwise covered by the protections afforded by the insurer.    **Surety Bond Coverage**  Surety bond coverage is required by state law. The Company carries surety coverage of $200,000 issued by Liberty Mutual Insurance Company. A copy of the most current bond is attached. |

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| **Contact Officer** | *John Wood – Owner, CEO* |
| **Date Approved** | *January 2019* |
| **Date of Commencement** | *January 2019* |
| **Amendment Dates** | *N/A* |
| **Date for Next Review** | *January 2020* |
| **Related References and Links** | * *Copies of aforementioned policies attached.* |

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| **Policies and Procedures** |
| **Privacy and Information Security** |

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| **Purpose** | Document a privacy and information security program (policies and procedures) to help ensure Ratified Title Groupmaintains written protocols for the protection of data and Non-public Personal Information (NPI). |
| **Scope** | These policies and procedures are for all of Ratified Title Group (hereafter referred to as “The Company”) locations including all satellite offices. These procedures are to be followed by all employees and independent contractors where applicable. |
| **Procedures** | The Company has a formal privacy and information security program that is appropriate with the size and complexity, the nature and scope of the Company’s activities and the sensitivity of the information in the Company’s possession. As part of this program, The Company maintains a Privacy Policy Notice (see attached) that is posted on The Company’s website and provided to customers and consumers for each order processed. Additional information about The Company’s privacy and information security program is available to consumers and customers upon request.  The Company policies associated with the privacy and information security program are given to all employees and the employees must acknowledge in writing that they have read and understand such policies. It is the responsibility of the Office Manager to help ensure The Company has received all employee acknowledgements.  The Company makes an assessment regularly of the standards and requirements affiliated with The Company’s information security program, including those set out in this policy and procedure document. This assessment is conducted by the Office Manager as well as the owner.  **Physical Security of NPI**  The Company utilizes our underwriters Old Republic National Title Insurance Company as the information providers for background and credit checks. The Company individuals who have access to NPI is restricted to authorized principals and employees who have undergone a formal background check and credit report process which identified no irregularities.  Removable media devices, including but not limited to external hard drives, compact discs, magnetic tapes and USB/flash drives are issued by the Company with the approval of the company owner. The use of removable media devices is prohibited unless the company owner has authorized such use. Removable media is kept in a secure area and accounted for when not in use.  Other standard procedures for security of NPI include closing paper files other than the one currently being worked on, stow files away when away from workspace and lock desks and file cabinets at the end of the day. Hardcopy NPI that is transmitted outside The Company is done so using only secured envelopes and/or locked document bags.  **Network Security of NPI**  At the direction of the Office Manager, The Company’s designated Network Administrator grants appropriate access to The Company’s various computer technology applications. The Company’s file server(s) or main central processing unit is housed in a secured computer room. The Company’s computer network utilizes up-to-date anti-virus, anti-spyware and data encryption software applications. The Network Administrator is responsible for such software maintenance.  Access to The Company’s information technology computers and network is secured by individual and unique passwords. The Company utilizes a computer application that prompts employees to change passwords in regular frequency (every 90 days). All The Company’s computers no matter, desktop or laptop run a “screen timeout” application causing automatic system sign off when the system detects no activity for a period of time.  **Disposal of NPI**  The Company has defined and communicated to employees the types of data/information that falls into the NPI category. Any NPI data is disposed of accordingly. Paper records by shredding. Documents are shredded on a monthly basis. In the meantime, said files and documents are locked in our office. When disposing of computers and portable storage devices, The Company uses a software application to erase/wipe clean the device.  **Disaster Management Plan for NPI**  The Company has a documented disaster management plan to help ensure adequate back-up, recovery and business continuation procedures. The plan also includes required procedures for notification and response to security incidents and breaches. The Company also maintains insurance coverage **(commercial property insurance, business interruption coverage)** for such circumstances. The disaster management plan is reviewed on an annual basis by the company owner and updated as appropriate.  **Security Practices of Independent Service Providers**  If independent service providers for The Company receive NPI from The Company, The Company shares this policy document with the service provider and/or conducts appropriate due diligence of the NPI security measures of the service provider before transmitting any NPI data. Service providers are aware they must notify The Company regarding NPI security breaches of NPI data that has been transmitted.  If security breaches occur, proper notification is provided to consumers and law enforcement in accordance with The Company’s privacy and information security program and disaster management plan. |

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| **Contact Officer** | *John Wood – Owner - CEO* |
| **Date Approved** | *January 2019* |
| **Date of Commencement** | *January 2019* |
| **Amendment Dates** | *N/A* |
| **Date for Next Review** | *January 2020* |

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| **Policies and Procedures** |
| **Title Policy Production/Premium Remittance** |

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| **Purpose** | Maintain written procedures related to title policy production, delivery, reporting and premium remittance to the insurer to help ensure Ratified Title Group meets its legal and contractual obligations. |
| **Scope** | These policies and procedures are for all of Ratified Title Group (hereafter referred to as “The Company”) locations including all satellite offices. These procedures are to be followed by all employees and independent contractors where applicable. |
| **Procedures** | **Policy Inventory**  The Company receives its policy inventory directly from the insurer. A Policy Inventory Report is maintained to track and monitor all of the paper and/or electronic policy numbers allocated to The Company. When policies are issued to customers, they move into an ‘issued’ status within the Policy Inventory reports.  .  The following items are included in the Policy Inventory report:   * The date paper and/or electronic policies are received by or allocated to The Company * The file number associated with each policy number * Unused policies * Voided policies * Policy numbers assigned, but not yet reported to the insurer * Policy issued, but not yet reported to the insurer   In addition to the Policy Inventory report, The Company has a tracking system that identifies files that have closed for which policies have not been issued.  Paper policy stock is kept locked up. Electronic policy stock is limited to authorized users with login and passwords.  Policy inventory duties have been clearly defined and are the responsibility of the assigned processor for any designated case file. We are able to reconcile our policy inventory records with the Insurer’s records.  **Policy Issuance**  Policies are issued to customers (lender and/or purchaser) within 30 days after the transaction is disbursed. Electronic logs are maintained within the software system to monitor all orders that have closed and disbursed in which final policies have not been issued.  If The Company does not perform the settlement/closing, the order is tracked and monitored by the designated processor assigned to the case file to help ensure the documents are received in a timely manner after disbursement.  If a short-form lender’s policy is issued, it can be delivered immediately after disbursement; however, monitoring procedures are still in place to help ensure the necessary documents are recorded.  **Premium Remittance and Policy Reporting**  In accordance with contractual or statutory obligations on a monthly basis, The Company reports to the insurer all title insurance policies (including endorsements), premiums and other fees as contractually obligated. Reporting is performed via electronic upload through the insurer’s electronic reporting web-based system. Physical copies of the policies are emailed (or mailed) to the insurer.  A policy register report is maintained by each office that performs policy production.  Premium remittance duties have been clearly defined and are the responsibility of the designated processor assigned to the case file along with accounting). We are able to reconcile the premiums and fees we charged to our customers with the premiums and fees remitted to the insurer. |

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| **Contact Officer** | *John Wood – Owner - CEO* |
| **Date Approved** | *January 2019* |
| **Date of Commencement** | *January 2019* |
| **Amendment Dates** | *N/A* |
| **Date for Next Review** | *January 2020* |

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| **Policies and Procedures** |
| **Escrow/Trust Accounting** |

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| **Purpose** | Document escrow/trust internal controls are in place to meet requirements for the safeguarding of client funds and to minimize the exposure to loss of client funds. |
| **Scope** | These policies and procedures are for all of Ratified Title Group (hereafter referred to as “The Company”) locations including all satellite offices. These procedures are to be followed by all employees and independent contractors where applicable. |
| **Procedures** | **Escrow funds and operating accounts are separately maintained.**  The Company maintains one active escrow account for real estate and mortgage loan transactions. Escrow/trust funds The Company maintains under a fiduciary capacity are not commingled with The Company’s operating funds or an employee or manager’s personal account.  **Escrow/Trust Accounts Trial Balance Reports**  A trial balance report depicting the balance of a particular customer’s funds can be produced for the escrow/trust account at any time. This report depicts all individual customer file balances that do not have a zero balance. On a monthly basis, Kendra Raley, Operations Manager reconciles the trial balance report to the bank balance and reconciled book balance, creating a “three way” reconciliation.  Trial balance reports are produced for each escrow/trust account maintained by The Company, including recording accounts and underwriter premium accounts.  **Escrow/Trust Account Reconciliations**  It is the responsibility of Kendra Raley, Operations Manager to reconcile the escrow/trust accounts. Monthly, a three-way reconciliation between the bank records, book records, and trial balance is performed. This reconciliation is completed within three days after receipt of bank statement.  A listing is kept of all escrow/trust accounts. This listing includes underwriter premiums accounts and recording accounts.  Each month, escrow/trust account reconciliations are reviewed by Company management and evidence of the review is documented. The escrow/trust account reconciliations are available to the title insurance underwriter at any time requested.  Escrow/trust account reconciling items are clearly noted on the reconciliations. These reconciling items are followed up and addressed by John Wood, owner within a few days of completion of the reconcilement so as to not carry over on the reconciliations from month to month.    **Escrow/Trust Accounts are properly labeled and maintained in insured institutions.**  Escrow/trust bank accounts are appropriately designated as “escrow” or “trust” accounts. This designation is noted in the original banking agreements as well as on our check stock, deposit slips, and bank statements. Unless mandated by state regulation or directed by a customer with a signed agreement, escrow/trust accounts are maintained with insured financial institutions.  **Dormant file balances.**  Customer files that continue to hold funds after the settlement date are reviewed periodically to determine if any disbursements have been made. Management approval by Kendra Raley or John Wood is required for any disbursement from an inactive escrow. An inactive escrow is defined as any escrow which has had no activity for the past six months. This approval is documented and maintained.  **Banking Transactions conducted by authorized employees.**  Via agreements with financial institutions, The Company management authorizes employees for escrow/trust bank account transactions. Wire transfer initiation and approval levels are set by The Company and reviewed for changes in staff routinely. Former employees are immediately deleted as signatories and authorized wire transfer individuals. A list of authorized individuals is maintained in the Escrow Account Information Report (see attached example). The individual(s) designated as the ‘wire transfer administrator’ to set-up and change online banking permissions has been authorized by management.  Authorized check signers and wire individuals do not maintain the escrow/trust accounting records or perform the escrow/trust account reconciliations.  **ACH Blocks, and international wire blocks are used.**  ACH blocks and international wire blocks are placed on all escrow/trust accounts to prevent unauthorized users from withdrawing funds from the escrow/trust account.  **Background checks.**  Before an individual is hired, a background check (criminal and credit) is performed byour underwriters. Periodically, a background check (including criminal and credit) is performed on existing employees who have access to escrow/trust account funds.  **Escrow/trust account training.**  The Company provides escrow/trust account to individuals handling customer funds and conducting escrow/trust account reconciliations. This training is conducted by Kendra Raley, operations manager. All training and continuing education is tracked and maintained by Kendra Raley, operations manager |

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| **Contact Officer** | **John Wood, Owner - CEO** |
| **Date Approved** | *January 2019* |
| **Date of Commencement** | *January 2019* |
| **Amendment Dates** | *N/A* |
| **Date for Next Review** | *January 2019* |
| **Related References and Links** | * *VA Escrow Regs:* [*http://leg1.state.va.us/cgi-bin/legp504.exe?000+cod+55-525.24*](http://leg1.state.va.us/cgi-bin/legp504.exe?000+cod+55-525.24) |



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| **Policies and Procedures** |
| **Consumer Complaints** |

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| **Purpose** | To establish a process for receiving and addressing consumer complaints to help ensure that **Ratified Title Group** addresses any instances of poor service or non-compliance. |
| **Scope** | These policies and procedures are for all of **Ratified Title Group** (hereafter referred to as “The Company”) locations including all satellite offices. These procedures are to be followed by all employees and independent contractors where applicable. |
| **Procedures** | **Maintain a standard consumer complaint form that identifies information that connects the complaint to a specific transaction.**  The Company has a standard consumer complaint form (attached) and uses this to record any/all consumer complaints. As circumstances warrant, supporting documents are attached to the complaint form which provide additional information including communications, facts or specific details. Management documents approval on completed consumer complaint forms.  **Single point of contact for consumer complaints and process for routing consumer complaints to appropriate personnel.**  **Kendra Raley and John Wood are the points** of contact at The Company for consumer complaints. The nature of the complaint determines to which appropriate personnel the complaint will be forwarded, if necessary.  **Log of consumer complaints that includes whether and how the complaint was resolved.**  The Company maintains a Consumer Complaint Log (attached) with information on all consumer complaints and their status. Company Management will periodically review, date and sign-off on the Consumer Complaint Log. |

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| **Contact Officer** | *John Wood – Owner CEO* |
| **Date Approved** | *January 2019* |
| **Date of Commencement** | *January 2019* |
| **Amendment Dates** |  |
| **Date for Next Review** | *January 2020* |
| **Related References and Links** | * *Reference where Consumer Complaint Form is kept.* * *Reference where the Consumer Complaint Log is kept.* |

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| **Purpose** | To establish a process for receiving and addressing consumer complaints to help ensure that Ratified Title Group any instances of poor service or non-compliance. |
| **Scope** | These policies and procedures are for all of Ratified Title Group (hereafter referred to as “The Company”) locations including all satellite offices. These procedures are to be followed by all employees and independent contractors where applicable. |
| **Procedures** | The Company has a standard consumer complaint form (attached) and uses this to record any/all consumer complaints. As circumstances warrant, supporting documents are attached to the complaint form which provide additional information including communications, facts or specific details. Management documents approval on completed consumer complaint forms.  **Single point of contact for consumer complaints and process for routing consumer complaints to appropriate personnel.**  The Office Manageris the single point of contact at The Company for consumer complaints. The nature of the complaint determines to which appropriate personnel the complaint will be forwarded, if necessary.  **Log of consumer complaints that includes whether and how the complaint was resolved.**  The Company maintains a Consumer Complaint Log (attached) with information on all consumer complaints and their status. Company Management will periodically review, date and sign-off on the Consumer Complaint Log. |



Please complete appropriate section(s) below, then “save as” using the following format:

“Last Name Consumer Complaint MMDDYY” and email to [email](mailto:rblitenthal@oldrepublictitle.com) address here

File Name Example: Smith Consumer Complaint 04-01-13

**Date of Inquiry:**

**MM-DD-YY**

**Consumer Contact Information:**

**Name(s) (Last, First)**

**Property Address (Street, City, State, Zip)**

**Contact Address (if different from Property Address)**

**Contact Phone Number**

**Additional Contact Phone Number**

**Transaction Information:**

**Agent File Number Policy Number**

**Property Type (Residential or Commercial) Transaction Type (Purchase, Refi, REO, etc.)**

**Briefly describe the nature of the consumer’s inquiry including dates of any conversations, phone calls, and names (including title and company affiliation) of those with whom consumer has spoken.**

**Indicate whether additional information or documentation is attached under separate cover.**

**Advise consumer that this will be routed to Contact Name, Contact Title.**

**Name/Title of person completing form**

**Management Review Name/Title**