Multistate Registration Filing Portal RFI Response

OurRecords

The Compliance Network

OurRecords RFI Response

Multistate Registration and Filing Portal, Inc.

Subject: Multistate Registration Filing Portal (MRFP) Request for Information Response

Dear MRFP selection team,

We are pleased to submit a response to the Multistate Registration Filing Portal (MRFP) Request for Information. The submission that follows outlines the current capabilities offered in our system and represents alignment and fulfillment of the needs expressed in the current and previous RFIs from the MRFP, with many capabilities that exceed base RFI requirements.

OurRecords will enable the MRFP to leap forward with a validated solution that is available today!

OurRecords founded the compliance network to eliminate duplication of work, excessive cost and time in managing compliance for both individuals and organizations.

OurRecords Enterprise Compliance Management allows you to easily manage compliance of your business partners, vendors or workforce, securely share records and credentials and send and receive your customers' sensitive information. OurRecords provides a centralized platform of integrated compliance management tools. All built into a single secure solution.

OurRecords can support an accelerated implementation timeline for the MRFP and ensure the fulfillment of the vision to maximize efficiency, data transparency, and information sharing by enabling compliance with registration requirements for all participating states without duplication of data entry.

We would be happy to answer any questions you may have and provide a demo at your earliest convenience.

We appreciate the opportunity to submit this response for your consideration.

Best regards,

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Co-Founder / CEO

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INTRODUCTION

The OurRecords network was created specifically to enable secure sharing of compliance credentials and critical records from a single portal in order to reduce the administrative overhead, duplicated effort, and risk of the distribution of personal and organizational data.

Highly regulated industries bear a significant administrative burden and liability risk for managing compliance and secure record sharing between organizations. OurRecords is a network that streamlines management of critical compliance and other records for both individuals and organizations.

We are confident that the existing functionality provided by OurRecords is a strong fit for the needs of Multistate Registration and Filing Portal, MRFP, Inc. Further, we are confident we can quickly close any identified gaps.

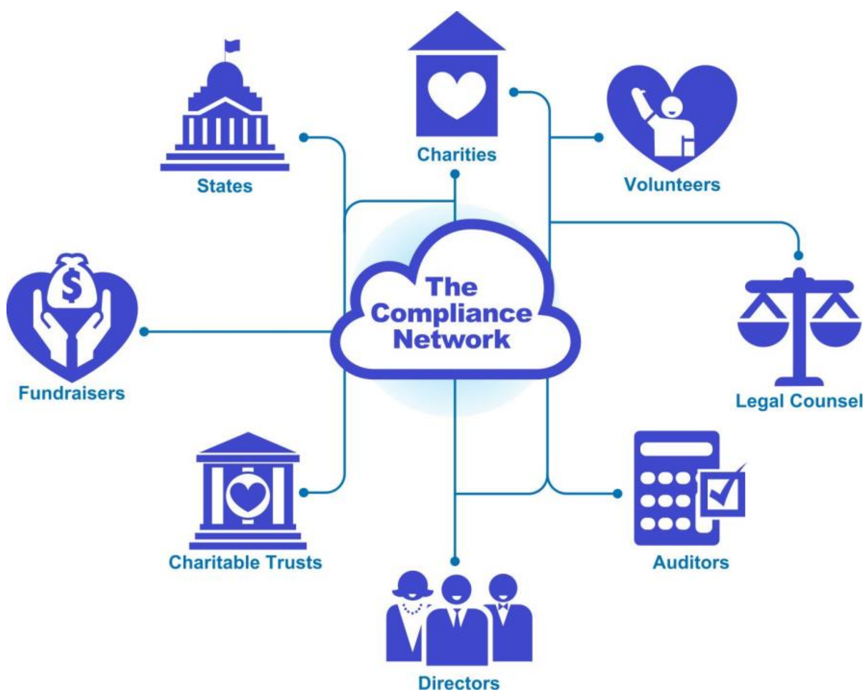
RESPONSE FORMAT

We have provided the following information to convey the fit of our solution:

1) High level overview of "How OurRecords Network works"
2) A summary table of the requirements along with a self-assessment rating of OurRecords compliance network.
3) A detailed explanation of the functional capabilities that support each requirement.
4) A summary of additional capabilities provided by OurRecords network NOT listed in the RFI requirements that we believe will add value to the charitable organizations, the states, and the general public.

OVERVIEW

The charitable enterprises compliance network:



OurRecords is a compliance network that securely connects all the members serving a community or industry, ensuring that the compliance requirements of each of the participants are met. OurRecords offers a robust, modern approach that simplifies the administrative overhead of complex relationships and regulatory requirements.

HOW OURRECORDS COMPLIANCE NETWORK WORKS

OurRecords has created a powerful, simple to use network to securely share and manage critical records for compliance and safety.

Process for States/Registration Service Providers

OurRecords provides the tools for managing states/registration service providers to easily communicate, collect, and monitor compliance requirements and data. Multiple organizational and/or individual professional roles or "opportunities" can be managed from a single portal.

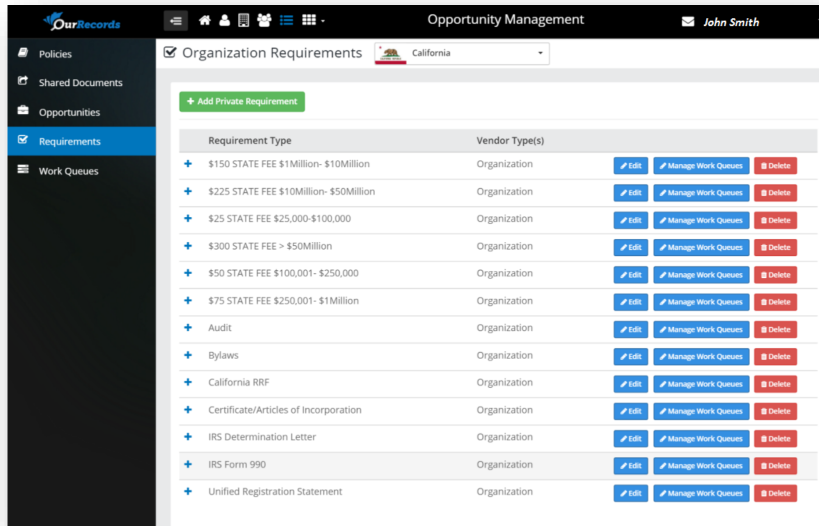
DEFINE REQUIREMENTS

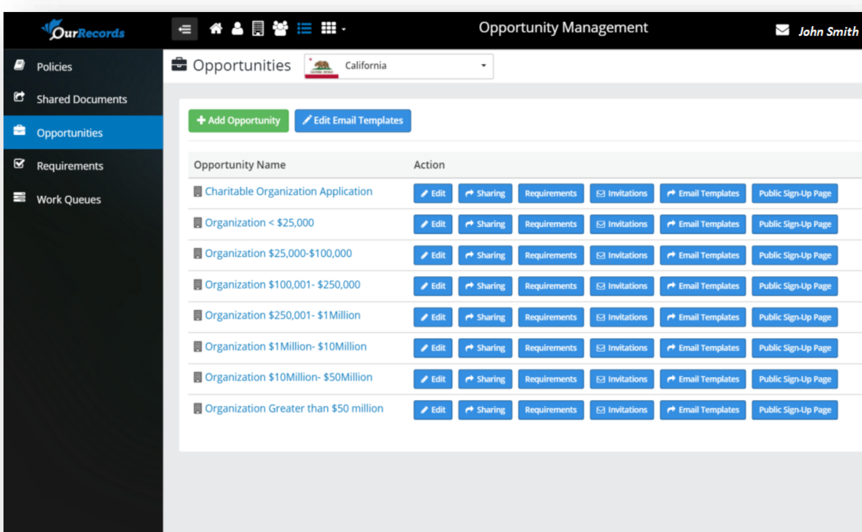
OurRecords enables each managing organization or state to define requirements and instructions for submission.

Our easy to use interface, allows administrators to setup requirements along with success criteria.

Easily attach sample documents or reference documents to clarify instructions.

Standard requirements ensure the entire community is operating not only the same way, but at the same high standard. OurRecords Industry shared requirements supports standardization!





CREATE OPPORTUNITIES

To simplify management and registration processes, managing states/registration service providers can define opportunities for each unique set of requirements.

Opportunities can be defined for both organizations and individuals.

Examples - Organizational opportunities: Charity collecting less than $25,000 annually, Charity collecting between $25,000-$100,000, Charitable Trust, etc. Individual opportunities: Professional Fund Raisers, etc.

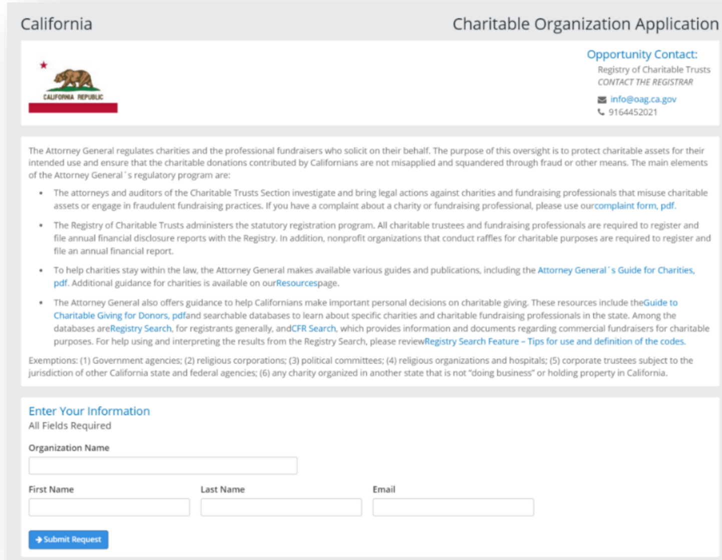
INVITE PARTICIPANTS

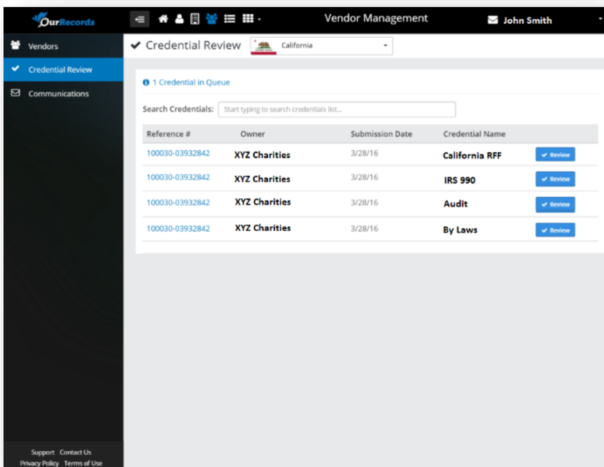
OurRecords provides multiple registration mechanisms for organizations and individuals.

Branded signup pages are configured and automatically generated through OurRecords opportunity administration tools for each opportunity offered by an organization.

Branded email invitations can be configured and sent to all your current registrants from the OurRecords communication center.

Sign up badge can auto generated through OurRecords opportunity administration tools and easily added to your existing web site.





VERIFY SUBMISSIONS

OurRecords funnels all submissions to the secure credential review portal where managing state/organization administrators review submissions.

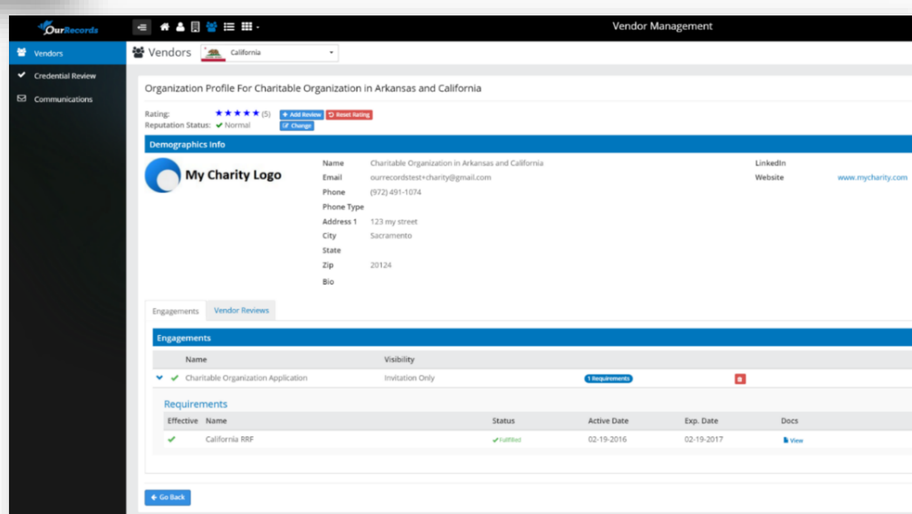
COMPLIANCE REPORTING

OurRecords measures, auto-generates, and sends weekly compliance reports.

Generate compliance reports on-demand.

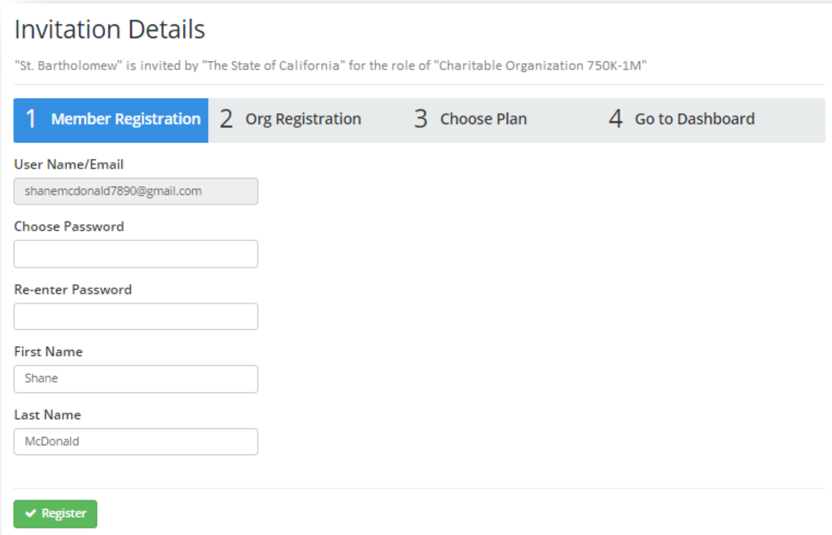
Search by registrant name to verify compliance.

Exception reports help easily identify high risk organizations.



Process for Organizations/Individuals Registering for Compliance:

OurRecords simplifies and streamlines compliance for organizations and individuals while supporting secure record management (see OurRecords compliance standards in TABLE 2). Registrants subscribe to OurRecords network, connect to the states/organizations for registration, and submit their registration information without duplication of effort all from a single portal.



ACCOUNT SUBSCRIPTION

OurRecords enables Organization administrators and Individuals to quickly and easily create a secure account to manage documents and compliance registration requirements from a single portal.

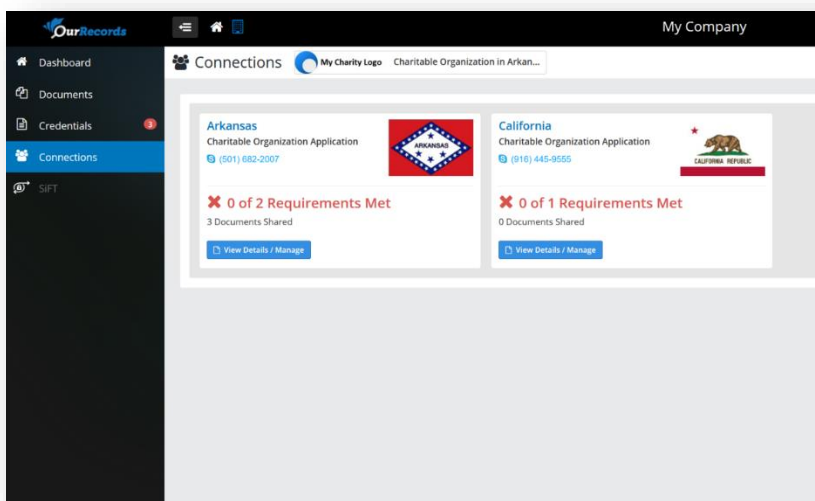
Organizations may have multiple administrators.

An administrator may be given rights to manage multiple organizations.

CONNECT

Individuals and organizations can connect to multiple states and/or organizations that require compliance management from their single account.

Connections can be made across market and industry segments eliminating the need for additional portals!

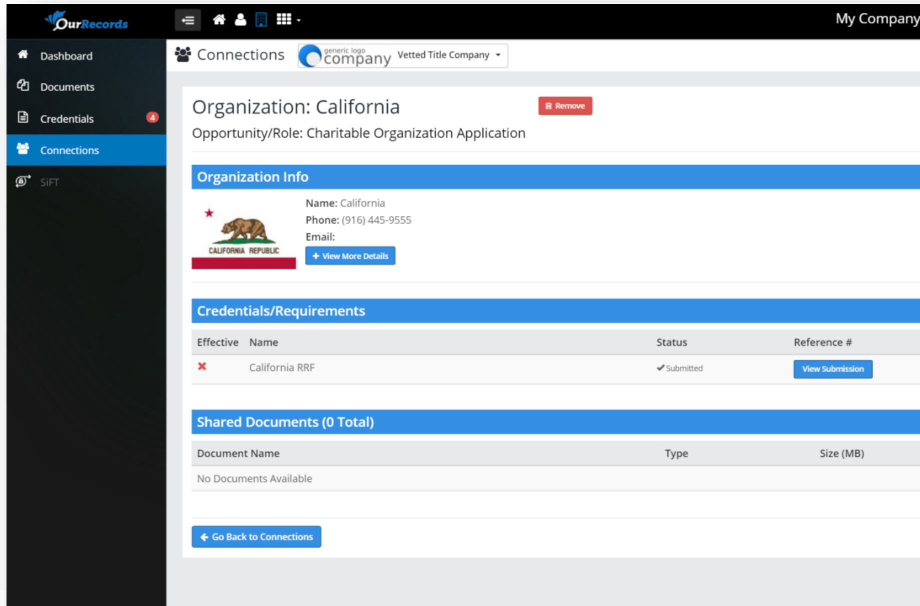


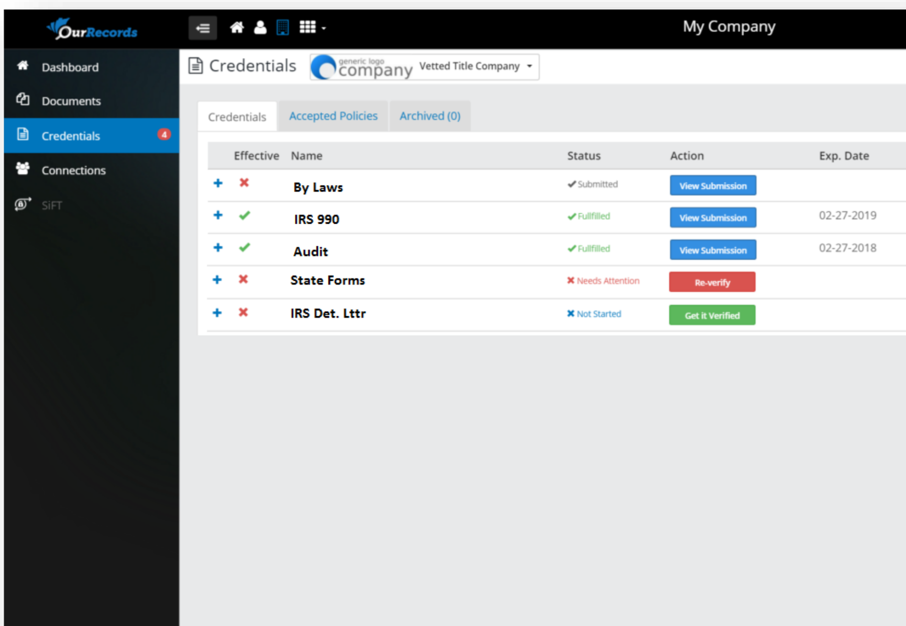
COMPLETE REQUIREMENTS

All requirements all aggregated in the registrant's dashboard and credentials tab so that duplicate requirements are not repeated.

Requirements may include fees, document submission for credentials such as liability insurance, IRS submission forms, specialized state forms, proof of audit, electronically acknowledged policies, etc.

Registrants are notified as credentials are verified by each connected managing state/organization.





MAINTAIN COMPLIANCE

All registrants are notified in advance of expiring credentials/fees so they stay compliant.

All registrant's critical credentials and documents are securely stored in a single location.

Registrants have the ability to securely share credentials and documents both within and outside of the OurRecords compliance network.

Registrant branded compliance pages are configured and automatically generated through OurRecords registrant tools to support public searches for publicly available registrant information.

States are notified when registrants become compliant and when registrants become non-compliant.

States can access the current compliance status and all supporting documentation at any time.

TABLE 1: RFI REQUIREMENTS

#	Requirement	Assessment	
		Fully Supported	Partially Supported
1	Allow charitable organizations and their professional fundraisers to register and file annual renewals and reports with multiple state charity offices through a single process.	✓	
2	Allow population of registration fields with data from electronically filed IRS 990 and 990EZ Tax Returns for tax exempt entities (Forms 990), and allow receipt of electronically filed 990s in machine-readable form from IRS, the user, or other sources.		✓
3	Allow registration service providers to transmit data for multiple registrant/clients electronically.	✓	
4	Allow private foundations to file a copy of their IRS Form 990-PF with their state attorney general in machine-readable electronic form, if available, or as a PDF.	✓	
5	Make the non-confidential collected registration data public in an open data format. Confidential data and Personally Identifiable Information must be inaccessible to unauthorized users.	✓	
6	Allow users to attach supporting documents as necessary.	✓	
7	Provide analytic tools for charity regulators to identify outliers that will enable improved response by regulators to potential fraud prevention, negligence or poor governance practices that may lead to loss or waste of charitable assets.	✓	
8	Use a transaction-based funding model.	✓	
9	Accept payment of state registration fees from applicants and allocate them to the appropriate state(s).	✓	

DETAILED EXPLANATION OF SYSTEM CAPABILITIES

Requirement #1: Allow charitable organizations and their professional fundraisers to register and file annual renewals and reports with multiple state charity offices through a single process.

OurRecords fully supports this requirement with standard system functionality.

The process would consist of the following steps for the charitable organization:

1) Create a subscription in OurRecords
2) Add additional charitable organization administrators as needed (up to 3 administrators are included in the organization subscription package).
3) From the connections tab, select a registration opportunity for each state and other organizations with which the charitable organization would like to register.
4) An aggregated (duplicates removed) list of requirements will show up in the charitable organization's dashboard and credentials tab.
5) The charitable organization administrator will step through each requirement and follow the step by step instructions for submission.
    a. All requirements will be given an expiration date as appropriate to each.
    b. Each requirement with have a list of acceptance criteria defined by the registration service provider and/or MRFP (examples include criteria such as dates, signatures, values, notarization, etc.)
    c. All documents uploaded will automatically be available for future viewing from the documents and the credentials tab.
    d. Documents can be shared, viewed, deleted, or archived from the documents or credentials tab
    e. Additional documents may be added to the documents tab as needed for convenient access by the charitable organization
6) The status of each requirement with each state will be visible from the My Compliance tab.
    a. Requirements may be accepted or rejected with further instructions as required (any failed acceptance criteria will be noted along with any notes from the registration service provider administrator(s)).
    b. Requirements may be accepted or rejected independently by each state or registration service provider.
    c. The charitable organization administrator will be notified via email as each requirement is accepted or rejected.
7) The status of each engagement with each state will be visible from the connections tab. Additionally, the charitable organization administrator will be notified via email as each opportunity engagement completes fulfillment.
    a. The charitable organization opportunity may be moved from one type of engagement to another as required by the workflow. For example, there may be a "pre-registration" opportunity. Once all documents are reviewed and validated, the charitable organization may be moved to a new opportunity classification by the registration service provider. An example may be a movement from a pre-registration opportunity to an opportunity such as "Charity collecting less than $25,000 annually" or "Charity collecting between $25,000-$100,000". In this case, the charitable organization will be notified when all pre-registration requirements have been met and the again when the classification for the adjusted opportunity is completed. The organization will then receive notification for any new requirements for the new opportunity classification. In this example, the different opportunity classifications may require different registration fees or additional documents or requirements.
    b. The registration status of the charitable organization is a combination of the state of the requirements (pending, expired, fulfilled) and the associated opportunity classification.
8) As registration requirements approach an expiration date, the charitable organization administrator(s) will be notified of which requirements are expiring and when. Notification is sent 30 days, 15 days and 5 days prior to

expiration as well as post-expiration. The state receives proactive reports of pending expirations 7 days prior to expiration.

9) Professional Fundraisers follow a similar process. They can connect directly to the state/registration service provider and the charitable organizations they serve as well as auditors or other organizations that have a subscription to manage registrants/vendors.

Requirement #2: Allow population of registration fields with data from electronically filed IRS 990 and 990EZ Tax Returns for tax exempt entities (Forms 990), and allow receipt of electronically filed 990s in machine-readable form from IRS, the user, or other sources.

OurRecords partially supports this requirement with standard system functionality.

OurRecords allows entry of data fields (name/value pairs) configurable and specific to each registration.

OurRecords currently has APIs to receive compliance data from 3rd party vendors such as state and county records from background check providers. We have reviewed the IRS development guide and are confident we can accommodate this requirement quickly if selected to provide services for MRFP.

Requirement #3: Allow registration service providers to transmit data for multiple registrant/clients electronically.

OurRecords fully supports this requirement with standard system functionality.

OurRecords has many built in mechanisms to support secure transmission of data. These include:

1) Secure Application Program Interfaces (APIs)
   OurRecords currently has APIs to securely transmit compliance data to external systems. Further information can be provided in a detailed discovery process if OurRecords is selected for further engagement with MRFP, Inc.
2) Network sharing
   This feature enables the registration service provider to automatically share one or more groups (opportunity registrants) with another group.
   Example:
   A State may create the following opportunities in their portal:
   1) Registered Auditors
   2) Charity Registration
   3) Charitable Trusts
   4) Charities collecting < $100,000
   5) Charities collecting between 100K and 1M

   The state may share the Registered Auditor network with the Charities collecting between 100K and 1M. The Charities and Auditor Networks can then mutually agree to connect to one another.

   Likewise, MRFP, Inc. may create an opportunity for Registered Auditors or Registered Fund Raisers and share those networks across all registered participating states.
3) Network Participation
   In the example above, Auditors may choose to upgrade their subscription to the OurRecords network as a Compliance Management Organization. In this case, the Auditors may create their own opportunities for charitable organizations to connect. These opportunities may have many of the same requirements as the state plus additional requirements for further vetting and rating of the charity.
   Example:
   An Auditor may create the following opportunities in their portal:
   a. Pre-audit Charitable organization
   b. A+ Rated Charitable organization

    c. Corporate Donor (As a client of the auditor, the corporate donor may have simple requirements such as policy acknowledgements or contracts. Corporate donor opportunities or participation would not be a requirement.)
4) Secure Intelligent File Transfer
   This feature enables the secure transmission of large data files via a secure email link

5) Work Queues
   This feature enables a state to automatically and securely forward collected and approved requirement documents to any state entity that requires access to them. For example, IRS Form 990's could be forwarded automatically to the agency or group that needs to file or act on them.

Requirement #4: Allow private foundations to file a copy of their IRS Form 990-PF with their state attorney general in machine-readable electronic form, if available, or as a PDF.
OurRecords fully supports this requirement with standard system functionality.

The feature is supported through standard requirements fulfillment. Existing system behavior enables the registration service provider to define requirements as well as requirement criteria. The requirement for the IRS 990-PF form can be defined as a requirement for all application opportunities. Additionally, specific criteria for acceptance such as signatures, dates, and notarization may be defined.

NOTE: After completion of automatic integration with the IRS, fulfillment can be automated in a similar method that OurRecords currently allows fulfillment of background checks through either uploading acceptable background check documentation or through integrated fulfillment.

Requirement #5: Make the non-confidential collected registration data public in an open data format. Confidential data and Personally Identifiable Information must be inaccessible to unauthorized users.
OurRecords fully supports this requirement with standard system functionality.

This feature is supported by customizable public search capabilities.

As suggested in a previously published RFI, the public can conduct the searches of the open data (name/value pairs collected for each opportunity) on the portal website using criteria such as 1. Organization type (i.e., charitable organization, professional fundraiser). 2. The name of the organization. 3. Organization purpose (i.e. educational, humane, scientific, social welfare or advocacy, environmental, etc.) 4. An organization's FEIN. 5. State of registration. 6. County. 7. City. 8. Zip Code. 9, Subsection code under IRC section 501(c). 10. Total Revenue. 11. Total Assets. 12. Total Program Expenses. 13. Total Fundraising Expenses. 14. Status of the organization as designated by the states in which the organization is registered (i.e., active, suspended). 15. Enforcement actions. 16. By calendar year (going back a minimum of three years).

OurRecords generates a public webpage for each account owner with default settings that protect confidential data and personally identifiable information.

Requirement #6: Allow users to attach supporting documents as necessary.
OurRecords fully supports this requirement with standard system functionality.

As standard system functionality, document attachments are a part of requirement fulfillment. Documents are viewable in the system by both the registering organization and the registration service provider.

Similarly, the registration service provider may attach documents as samples for requirement fulfillment.

Registration service providers may also share forms, procedures and other documents from their "shared documents" tab with all registrants.

Requirement #7: Provide analytic tools for charity regulators to identify outliers that will enable improved response by regulators to potential fraud prevention, negligence or poor governance practices that may lead to loss or waste of charitable assets.
Without knowing the specific reporting requirements, our assessment is that OurRecords supports this requirement with standard system functionality.

OurRecords provides standard compliance reports and exception reports to registration service providers and well as criteria based searches. OurRecords allows profile search of any registrant and sends electronic notifications when registrants become non-compliant.

If selected by MRFP, OurRecords will work to provide any additional required reports.

Requirement #8: Use a transaction-based funding model.
OurRecords fully supports this requirement with standard system functionality.

OurRecords network is a subscription based model based on the transaction levels of the organizations. The system is fully operational, built on the secure, globally scalable Microsoft Azure platform.

Requirement #9: Accept payment of state registration fees from applicants and allocate them to the appropriate state(s).
OurRecords fully supports this requirement with standard system functionality.

Acceptance of fees is a configurable requirement for each opportunity for each registration service provider/state.

TABLE 2: ADDITIONAL FEATURES AND CAPABILITIES PROVIDE BY OURRECORDS COMPLIANCE NETWORK THAT ARE NOT LISTED IN RFI REQUIREMENTS

#	Requirement	Fully Supported
1	Document review, approval, rejection portal and workflow support	✓
2	Documented call log, rating system for each registrant	✓
3	Secure document sharing	✓
4	Geographical search	✓
5	Integrated Email Communications	✓
6	Support for dynamically changing requirements (through the year, independent of state)	✓
7	Extended capability to management volunteers or other service providers	✓
8	Secure Intelligent File Transfer (SIFT) for protecting PII and exchanging sensitive information with others	✓
9	Dynamically manage connections – connect/disconnect with other states and entities as needed	✓
10	Share frequently used documents with specific organizational groups	✓
11	Application Programmer Interface (API) to allow access for other computer systems to import records and credential status	✓
12	Automatically forward documents to appropriate state recipients on approval.	✓
13	Branded sign up page for each state (or entity)	✓
14	Email out invitations to existing approved charitable connections	✓
15	Email communications are customized per state (or entity)	✓
16	Completely, and dynamically customize your specific requirements for each state (entity) where necessary	✓
17	Support for click through policy acknowledgement where desired	✓
18	Companies that provide data / services to either the public or government entities can leverage OurRecords API's to have a current view of a charitable organizations status with each state entity.	✓
19	Independent state approval of submission and tracking of status for each state	✓

20	Single submission to all states for common requirements	✓
21	Customize additional requirements as needed	✓
22	View of compliance status for each charity to know what their status is for each state	✓
23	Single dashboard view of any actions required to be performed at any given time	✓
24	W3C Compliance	✓
25	System scalability with the ability to manage geographic redundancy and multiple hosting center accessibility	✓
26	OurRecords meets a broad set of international and industry-specific compliance ISO 27001, HIPAA, FedRAMP, SOC 1 and SOC 2	✓