

WiB Underwriting Guidelines

Freedom Debt Relief, Wholesale

Sept 2025

Account Balance Enrollment

Description	The minimum account balance required to enroll an account in the Freedom Debt Relief program.
Guideline	Minimum account balance at enrollment is \$200.00
Action	<ul style="list-style-type: none">Accounts with an account balance less than \$200.00 are not acceptable.Do not adjust balances to \$200.00, account balances must reflect the account balance shown on documentation (Credit Report or Statement).

Achieve Personal Loans(Previously F+)/Consolidation Plus C+

Guideline	Clients with active Achieve Personal Loans and Achieve Accelerated Loan are not eligible for the Freedom Debt Relief program, unless the file meets one of the requirements listed below: <ul style="list-style-type: none">If the Achieve Personal Loans (APP)/Achieve Accelerated Loan (CP) is paid off, the client can be enrolled in FDR; proof that the loan is paid off will be required.FDR clients with an Achieve Personal Loan are eligible to enroll, however the Achieve Personal Loan is NOT eligible to enroll.FDR clients with an Achieve Accelerated Loan are NOT eligible to enroll.ARP clients with an Achieve Personal Loan/Achieve Accelerated Loan are eligible to enroll, however the Achieve Personal Loan/Achieve Accelerated Loan is not eligible to enroll.
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Auto Loans

Description	A loan originated from the purchase of a vehicle.
Guideline	Auto Loans are an acceptable type of debt, only if the client is able to provide adequate documentation and the client is no longer in possession of the vehicle itself. <i>(Debt must meet program requirements in addition to the documentation requirements).</i>
Action	<p>Acceptable Documentation:</p> <ul style="list-style-type: none">● Credit Report must show R8, R9, I8, or I9 status● OR the client must be able to provide a deficiency balance letter from the creditor.<ul style="list-style-type: none">○ Repossessed- proof vehicle has been sold off (must include new balance)○ Voluntary Surrender- proof vehicle has been sold off (must include new balance)● OR provide a Credit Report with the account listed with one of the following statuses:<ul style="list-style-type: none">○ Merchandise was taken by lender○ Profit & loss write-off○ Reported as a loss by credit grantor○ Charged Off○ In Collections

Business Debt

Description	A business acquired debt used to fund operating needs or capital purchases.
Guideline	Business Debts are eligible if debt meets outlined requirements, a <i>Business Debt Acknowledgement</i> will be required. SBA (Small Business Administration) Loans are not eligible. Business debt listed as personally guaranteed on the Credit Report is eligible for ARP.
Action	<ul style="list-style-type: none">● Always research the business to verify if it is still active.<ul style="list-style-type: none">○ Business Debt with a Sole Proprietorship must be enrolled regardless if business is still active. (These are usually on the Credit Report) Sole Proprietorship needs to be researched if not reporting on the credit report.○ LLC, Partnership, S-Corp, C-Corp- must be dissolved and verified through the Secretary of State (SOS) website to be eligible for enrollment. The Secretary of State approval showing the date when the request to dissolve the business was filed will be required.● If the account is reporting on the Credit Report, the account does not need to be researched as it is personally guaranteed.

California 1405 (CA 1405)

Description	The California Assembly Bill 1405 enacts the Fair Debt Settlement Practices Act . <ul style="list-style-type: none">● Approved by the Governor and filed with the Secretary of State on October 4, 2021.
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Guideline	<p>If a client from California is enrolling into the program they would need to follow the California requirements.</p> <p>FDR clients can only enroll debt(s) they are legally responsible for; 3rd party joint debt is not eligible for CA clients. This means:</p> <ul style="list-style-type: none"> • Joint debt with a person/persons not enrolling in the program are not considered eligible for the program. <ul style="list-style-type: none"> ◦ ie: John and Jane are enrolling in the program and have joint debts; these are eligible. However, Jane has a loan with Kelly. This debt with Kelly will not be eligible to enroll.
Action	<ul style="list-style-type: none"> • The total amount of the debt required to be listed on the agreement may be based on either a billing statement for the debt or information in the consumer's consumer report. The billing statement or consumer report must have been issued within 30 days of the date of the contract.

CIP Validation

Description	<p>A Customer Identification Program (CIP) is a United States requirement, where financial institutions need to verify the identity of individuals wishing to conduct financial transactions with them and is a provision of the USA Patriot Act.</p>
Guideline	<p>If a client has failed to provide acceptable documentation needed to validate their identity.</p>
Action	<ul style="list-style-type: none"> • Verify clients CIP information on Credit Report matches the file, if there is a mismatch of Name, Physical Address, SSN, or DOB from the file to the credit report. • If the client's address on the file matches an address other than the Best Address** listed on the Credit Report, no documentation is needed. If the apartment number, street type (I.E: St, Ave, etc), or directional part (I.E: E,S,W,or N) is missing on the credit report but is on the file no documentation is needed. (**Best Address, refers to Experian Credit Report; refer to Source

(of Information for Transunion Credit Reports.)

- If the client's city on the file and on the CR are different, but the zip code has been verified as being the same Zip code on USPS.com, we can take it as is. No additional documentation will be required. Note the file as "Verified Zip Code on USPS."
- FDR will accept an ITIN client, however the CIP process still applies and is subject to CIP validation requirements.
- If the documentation provided is illegible in any way (name, date of birth, address, or social security number) it cannot be accepted

Physical Address	SSN/ITIN	Date of Birth	Name
Utility bill (electric, water, cable, phone, internet, etc.) listing service address dated within the past 6 months	Signed Social Security Card (or ITIN Card) A letter from the social security Administration showing full SSN #	Current state driver's license or ID card Current U.S. passport	Current state driver's license or ID card Current U.S. passport
2 copies of anything mailed or a delivery receipt from dated within the past 6 months	W-2 showing full SSN# Social Security statement showing full SSN#	U.S. birth certificate Resident alien card	U.S. birth certificate Resident alien card
Current Lease/rental agreement	A paystub with full SSN# showing	Permanent resident card	Permanent resident card
Most current property tax statement			
Current Homeowner's insurance statement, bill, or policy			

	Current Home loan statement		
	Current state driver's license or ID card		
	W-2 (current year)		

Debt Settlement Accelerated Loans

Description	A debt settlement acceleration loan is a loan offered to consumers that are currently in debt resolution programs. With an acceleration loan, the proceeds are provided to fund the consumer's debt resolution program and accelerate the negotiation and settlement process. After that, their debt resolution program is complete, and the consumer's payments for that program will end. Finally, the consumers will begin making payments for their acceleration loan instead.
Guideline	Clients are NOT eligible for enrollment where either of the following two conditions are true: <ul style="list-style-type: none"> • Condition 1: <ul style="list-style-type: none"> ○ Consumer originated a Debt Settlement Acceleration Loan within the previous 6 months • Condition 2: <ul style="list-style-type: none"> ○ Consumer is attempting to enroll only a single account into their program and that one account is a Debt Settlement Acceleration Loan This applies to the following program types: <ul style="list-style-type: none"> • Freedom Debt Relief • Achieve Resolution • Attorney Represented Program(Also Known as Turnbull) • Century Support Services

Action	<p>List of Known Debt Settlement Acceleration Loans</p> <ul style="list-style-type: none"> • Reach Financial • New Credit America • Above Lending • Credit9 • LendingUSA Fresh Start • Versera Lending
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Debt Settlement Programs

Description	Debt settlement is an approach to debt reduction in which the debtor and creditor agree on a reduced balance to resolve, or "settle," the debt owed.
Guideline	A client cannot be enrolled in more than one debt settlement program. This includes: <ul style="list-style-type: none"> • Debt Settlement Programs • Credit Counseling • Credit Repair

Hardships

Description	A hardship is an explanation of the circumstances that lead to the client's inability to pay off their debt. A Hardship can include the loss of a job, the death of a spouse, Medical, a divorce, a reduction in pay, transfer, or some other serious change in financial circumstances.
Guideline	Freedom Debt Relief is a hardship based program, clients enrolling must provide a hardship detailing why they are unable to pay off their debt.

Legal Accounts

Description	<p>FDR will accept accounts that have been sent to a law firm (both ISL and OSL). Exception: Accounts in active litigation cannot be enrolled.</p> <p>Terms to Know:</p> <p>In-State Legal (ISL) – account being handled by a law firm that is registered to litigate in the same state as the prospect's residence.</p> <p>Out-of-State Legal (OSL) – account being handled by a law firm that is NOT registered to litigate in the same state as the prospect's residence.</p> <p>Active Litigation – the prospect has been served a summons and complaint for the debt on the account.</p>
Guideline	<p>FDR and ARP will accept accounts that have been sent to a law firm (both ISL and OSL). Exception: Accounts in active litigation cannot be enrolled.</p>

Medical Debt

Description	Medical debt refers to debt incurred by individuals due to health care costs and related expenses.
Guideline	Medical debts are eligible for enrollment.

Action	<ul style="list-style-type: none"> ● Medical Debt must have a minimum balance of \$200.00 at the time of enrollment. <ul style="list-style-type: none"> ○ If the Medical debt falls below \$200.00; Program Review Guidelines will require that all enrolling Medical debt (<i>under \$200.00</i>) must be listed with the same Medical Facility to be eligible for enrollment. ■ A recent medical statement will be required; A valid statement must list all the enrolling medical associated debt in the same statement. If a valid statement cannot be provided, the debt(s) will not be eligible for enrollment. ■ A Credit Report in place of a statement will not be accepted for Medical accounts. The Credit Report will not display the original creditor and cannot be used to verify that all medical debts are with the same medical facility. ● Medical Debts will require the submission of the Patient Name associated with the enrolling medical debt. If the medical debt is a Veterinary account, the pet's name must be provided. ● Medical Payment data is not considered the original/creditor name and submission containing medical payment data in place of the original creditor name will be rejected.
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Omni Financial

Description	Omni Financial is a military lending company.
Guideline	Omni Financial & Omni Military Loans will not be eligible for enrollment.

Provisional Enrollment

Description	<p>Allows a prospect to enroll debt in their FDR program that has pending debt account specific "Hard Conditions" for enrollment.</p> <p>Allows FDR & the prospect 30 days post enrollment (lead submission to Salesforce) to complete all debt specific conditions for enrollment.</p>
Guideline	<ul style="list-style-type: none"> ● If all conditions are met within 30 days: <ul style="list-style-type: none"> ○ Debt becomes enrolled ○ The Provisional Flag is Removed from Salesforce ● If all conditions NOT met within 30 days: <ul style="list-style-type: none"> ○ The Debt becomes Omitted from Program in Salesforce

Reinstatements

Description	A reinstatement is the process of restoring a client's account after a termination/rescission has been processed.
Guideline	<p>Freedom Debt Relief (FDR)</p> <p>If the termination/rescission date is less than 90 days:</p> <ul style="list-style-type: none">• No matter who the client contacts for an enrollment/reinstatement, CS must reinstate (unit stays with original DC). <p>If the termination/rescission date is greater than 90 days:</p> <ul style="list-style-type: none">• CS must transfer the client to DC/Sales to re-enroll. If a client contacts DC/Sales directly, DC/Sales will re-enroll. <p>Attorney Represented Program (ARP)</p> <p>If the termination/rescission date is less than 90 days:</p> <ul style="list-style-type: none">• No matter who the client contacts for an enrollment/reinstatement, CS must reinstate (unit stays with original DC). <p>If the termination/rescission date is greater than 90 days:</p> <ul style="list-style-type: none">• CS must transfer the client to DC/Sales to re-enroll. If a client contacts DC/Sales directly, DC/Sales will re-enroll.

Resident Alien/ITIN

Guideline	Client's must have a valid SSN or ITIN (Individual Tax Identification Number) to be eligible for enrollment.
Action	<p>If the client does not have a valid SSN or ITIN number the client will not be eligible for enrollment.</p> <ul style="list-style-type: none">• All ITIN client must provide verification documents before approval• ITIN clients are still subject to CIP verification processes• FDR will accept an ITIN and can be used in place of a SSN (Social Security Number)

Single Account Type Program

Description	A client file where all debt enrolled is housed with a single creditor.
Guideline	<ul style="list-style-type: none">● Max term length for a Single Account type program is 30 months.● FDR/ARP will not accept the following in a single account type program.<ul style="list-style-type: none">○ High Interest Rate (50% or higher interest rate)○ Collections with the same original creditor○ Discover/AMEX/Debt Settlement Acceleration Loans<ul style="list-style-type: none">■ IE: Discover Card, and Discover Loan would not be eligible.■ If the account has one of each it is okay to enroll.<ul style="list-style-type: none">➤ IE: Amex card and Discover card this is eligible to enroll

Student Loans

Description	A student loan is a form of financial assistance which is offered to students which is used to pay off education-related expenses, such as college tuition, room and board at the university, or textbooks.
Guideline	Only Private Student loans are eligible for enrollment. <ul style="list-style-type: none">● Federal Loans are not acceptable.● Student loans in Forbearance are not acceptable.
	<ul style="list-style-type: none">● Student loans with an Educational Facility, trade school, and or tuition services must currently be with a third party collections agency to be eligible for enrollment.
Action	<ul style="list-style-type: none">● National Collegiate Student Loans must provide the original lender AND the NSLDS report.● If a client has Student loans and is unable to determine if they are Federal or Private, the client can contact the US Board of Education (800-872-5327) for additional information or visit https://nsldsfap.ed.gov/login to obtain NSLDS.● The client will need to provide the following information (SSN, DOB and School(s) they attended). Clients can request the Board of Education to FAX necessary information or refer to an online website.

Term Extension Request

Description	Files requesting a program term extension of 53 months or higher.
Guideline	Files with a program length of 53 months or greater, will need to meet the debt minimum requirements.
Action	<ul style="list-style-type: none">To be eligible for 53 months, clients will need to have \$30,000 in eligible debt enrolled, and for 60 months, clients will need to have \$100,000 in eligible debt enrolled.<i>FDR files can be approved for 53/60 months no matter the disposable income.</i><i>ARP files needs to have a disposable income of \$50 or greater</i>

Truth in Lending (TIL)

Description	A truth in lending (TIL) statement contains information regarding the annual percentage rate, the finance charge, the amount financed, and the total payments required to satisfy the loan.
Guideline	TIL Documents are required on any account reporting as Secured, Unknown or any loan not reporting on the credit report. If a loan is being manually added that is not reporting on the credit report, a current statement and TIL Disclosure Statement will