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## Welcome to Compliance Collections And Tracking

Your one-stop location for:

Compliance Self-Assessment

Compliance Tracking

Compliance Scorecard

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Debt Owner

Collection Agency

Debt Buyer

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Audit & Risk Mitigation  
Compliance Tracking

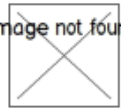




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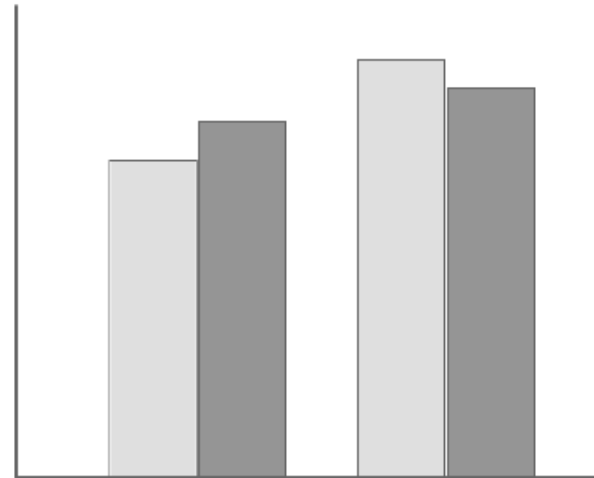


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## Compliance Scorecard

[Main Menu](#)**Module 1 - Entity Business Model****Module 2 - Entity Business Model****Module 3 - Debt Collection Communications****Module 4 - Information Sharing & Privacy****Module 5 - Consumer Complaints & Resolutions****Module 6 - Equal Credit Opportunity Act****Module 7 - Litigation Practices & Reposeion****LEGEND:**

0 = Not Compliant, 1 = Unsure, 2 = Slightly Agree, 3 = Agree, 4 = Strongly Agree, 5 = Fully Compliant



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## Compliance Self-Assessment - Module 1 (Page 1 of 5):

[Next Page](#)[Next Module](#)

### Entity Business Model

**Note: Provide data in all modules before completing assessment**

- 1.1  Does your entity fall within the general definition of "debt collector?" Does your entity fall within the general definition of "debt collector?"
- 1.2  Does your organization perform or engage in the following activities:
- 1.2.1  Regularly collects, or attempts to collect, consumer debts for another person or institution
- 1.2.2  Uses interstate commerce or the mail in a business the principal purpose of which is consumer debt collection
- 1.2.3  Uses a name other than its own when collecting its own consumer debts - - OR
- 1.2.4  Seeks to collect on a consumer debt it owns that was already in default at the time it acquired it (15 U.S.C. 1692A(6))
- 1.3  Does your organization collect on consumer accounts using its own name for any of the following?
- 1.3.1  Debts it originated for itself
- 1.3.2  Debts that were not in default when they were obtained
- 1.3.3  Debts that were obtained as security for a commercial credit transaction
- 1.3.4  Debts incidental to a bona fide fiduciary relationship or escrow arrangement
- 1.4  Does an officer or employee of your organization collect debts owed to your company in the company's own name?
- 1.5  Does your organization collect on debts regularly for other institutions to which it is related by common ownership or corporate control if the entity only does so for persons to whom it is so related or affiliated and the entity's principal business is not the collection of debts?

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**Compliance Self-Assessment - Module 1 (Page 2 of 5):**[Prev Page](#)[Next Page](#)[Next Module](#)**Entity Business Model****Note: Provide data in all modules before completing assessment**

- 1.6   Is your business entity affiliated with any other entities, and if so, please select the nature of the affiliates business activities, including whether any of the affiliates engage in debt collection.
- 1.7   Does your entity or affiliate use any service providers in conducting its debt collection activities? If so, please provide the following:
- 1.7.1   Debts it originated for itself
- 1.7.2   Identify whether they are affiliated with the entity
- 1.7.3   Identify what services they perform
- 1.7.4   Assess whether the entity performs any of the following tasks:
- 1.7.4.1   Requests and reviews the service providers' policies, procedures, internal controls, and training materials to ensure that the service providers conduct appropriate training and oversight of employees or agents that have consumer contact or compliance responsibilities.
- 1.7.4.2   Does the service provider inform, as appropriate and enforceable consequences for violating any compliance-related responsibilities?
- 1.7.4.3   Establishes internal controls and on-going monitoring to determine whether its service providers are complying with Federal consumer financial law
- 1.7.4.4   Takes prompt action to address fully any problems identified through the monitoring process, including terminating the relationship where appropriate
- 1.8   Does your company have an organizational chart that indicates the reporting structure and the responsibilities of key managers for debt collection activities?

**LEGEND:**  = Not Compliant,  = Unsure,  = Slightly Agree,  = Agree,  = Strongly Agree,  = Fully Compliant

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**Compliance Self-Assessment - Module 1 (Page 3 of 5):**[Prev Page](#)[Next Page](#)[Next Module](#)**Entity Business Model****Note: Provide data in all modules before completing assessment**

- |        |                                |  |
|--------|--------------------------------|--|
| 1.9    | <input type="text" value="0"/> | Does your company have documented information regarding the qualifications, experience levels, and training programs that the company requires or uses for staff who interact with consumers?  |
| 1.10   | <input type="text" value="0"/> | Does your company perform annual evaluations of compensation practices and programs?   |
| 1.11   | <input type="text" value="0"/> | Does your company evaluate the quality and impact of controls on the compensation program?   |
| 1.12   | <input type="text" value="0"/> | To the extent that your company's compensation program creates incentives for behaviors or practices that result in heightened risk to consumers, does it also include disciplinary procedures such as reductions in compensation or termination if an employee is found to engage in such risky behaviors or practices? |
| 1.13   | <input type="text" value="0"/> | Does your organization collect on any debt purchased from another party, and if so. . .  |
| 1.13.1 | <input type="text" value="0"/> | Is the information you receive at purchase sufficient to determine the consumer's identify and the amount due?   |
| 1.13.2 | <input type="text" value="0"/> | Are you able to determine whether fees charged were permitted by contract, and the original creditor?  |
| 1.14   | <input type="text" value="0"/> | With respect to Sales Contracts, does the contract include provisions that describe the nature of the account-level informaiton that is provided by the seller?  |
| 1.15   | <input type="text" value="0"/> | With respect to Sales contracts, are any representations or disclaimers made relating to the accuracy of the account-level information that is provided by the seller?   |
| 1.16   | <input type="text" value="0"/> | Is there any reason to doubt the acuracy of the account-level informaiton received from the seller?  |
| 1.17   | <input type="text" value="0"/> | Does your purchase process include due diligence that assists your organization in identifying any of the following:   |
| 1.17.1 | <input type="text" value="0"/> | Patterns of disputes   |
| 1.17.2 | <input type="text" value="0"/> | Unusual gaps of information  |
| 1.17.3 | <input type="text" value="0"/> | Known problems with the account maintenance  |

**LEGEND:** 0 = Not Compliant, 1 = Unsure, 2 = Slightly Agree, 3 = Agree, 4 = Strongly Agree, 5 = Fully Compliant



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**Compliance Self-Assessment - Module 1 (Page 4 of 5):**[Prev Page](#)[Next Page](#)[Next Module](#)**Entity Business Model****Note: Provide data in all modules before completing assessment**

- 1.18  In your transaciton documentation with the sellers, is your organization able to request additional account-level information?
- 1.19  Does documentation provide information regarding how long the additional account-level information will be available and how much it will cost?
- 1.20  Does your documentation for the transaction provide information which is sufficient to substantiate representations you will make to consumers regarding the debt and the consumer's liability for the debt?
- 1.21  Does your organizaition sell any debt to any debt buyers? If so:
- 1.21.1  Does your company have a formal Debt Sales Agreement?
- 1.21.2  Does your company provide informaiton sufficient for the purchaser to determine the consumer's identify?
- 1.21.3  What it the amount due?
- 1.21.4  Are there any fees charged where permitted by contract?
- 1.21.5  Who is the original creditor?
- 1.22  Does your Debt Sale Agreement provide for the following:
- 1.22.1  Provisions that describe the nature of the account-level information provided to the debt buyer?
- 1.22.2  Whether any representations or disclaimers are made relating to the accuracy of the account-level information provided to the debt buyer?
- 1.22.3  Whether the entity agreed to provide additional account-level information upon the buyer's request, including how long the additional account-level information will be available and how much it will cost?
- 1.23  If your organization sells any debt that may be disputed by the consumer?
- 1.24  Does your cmpany verify the debt prior to selling it?

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**Compliance Self-Assessment - Module 1 (Page 5 of 5):**[Prev Page](#)[Save & Continue](#)[Save & Exit](#)[Next Module](#)**Entity Business Model****Note: Provide data in all modules before completing assessment**

- 1.25  Does your company provide information about the dispute to the debt buyer?
- 1.26  Does your company determine whether it has reason to doubt the accuracy of the account-level information you provided ot buyers prior to selling the account(s)?
- 1.27  Does your company transfer consumer accounts to any third parties for collection activity and, if so, what are the circumstances where an account would be transferred?
- 1.28  Does your organizaiton sell any debt to any debt buyers? If so:
- 1.29  Is the information about any consumer disputes is communicated to the third party agency?
- 1.30  If your company is trnsferring the data, is the information you provide to the third party about the account accurate and does it fully reflect the information you know about the account?

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**Compliance Self-Assessment - Module 2 (Page 1 of 4):**[Prev Page](#)[Next Page](#)[Prev Module](#)[Next Module](#)**Communications in Connection with Debt Collection****Note: Provide data in all modules before completing assessment**

- 2.1  Do representatives from your company place debt collection calls without meaningful disclosure of its identity (except for the sole purpose of acquiring location information)?
- 2.2  Do representatives from your company disclose in your first written communication with consumers they are attempting to collect a debt on that any information obtained will be used for that purpose?
- 2.3  If the initial communication is oral, do debt collectors also disclose the same information in the initial oral communication or subsequent communications to debtors?
- 2.4  Have debt collectors from your organization misrepresented their identity or authorization by any of the following:
- 2.4.1  Using any business, company, or organization name other than the true name of the debt collector's business, company, or organization?
- 2.4.2  Misrepresenting that it is vouched for, bonded by, or affiliated with the United States or any State, including by using any badge, uniform, or facsimile?
- 2.4.3  Representing or implying that an individual debt collector is an attorney?
- 2.4.4  Representing that it operates or is employed by a consumer reporting agency?
- 2.4.5  Using or distributing any written communication that creates a false impression as to its source, authorization, or approval, or that simulates or is falsely represented to be a government document (15 U.S.C. 1692e(9)); - - OR
- 2.4.6  Using any forms that falsely imply that someone other than the creditor is participating in the collection activities. If so, determine the source of the forms (15 U.S.C. 1692j).
- 2.5  Do your debt collectors make any false representations regarding the nature of the communications, for example by:
- 2.5.1  Falsely representing or implying that documents are legal process; - - - OR
- 2.5.2  Falsely representing that documents are not legal process forms, or that documents do not require action by the consumer?

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**Compliance Self-Assessment - Module 2 (Page 2 of 4):**[Prev Page](#)[Next Page](#)[Prev Module](#)[Next Module](#)**Communications in Connection with Debt Collection****Note: Provide data in all modules before completing assessment**

- 2.6  Do your organization's debt collectors send postcards to communicate with the consumer regarding a debt?
- 2.7  Do those debt collectors refrain from using any language or symbols on envelopes, other than its address and its business name, when communicating with consumers by mail or telegram, and if so, is the business name on envelopes indicating that it is in the debt collection business?
- 2.8  Do your debt collectors cause any person to incur charges for communications by concealing the true purpose of the communications such as making collect calls or sending telegrams?
- 2.9  Do the debt collectors communicate with the consumer without obtaining prior consent directly from the consumer or the express permission of a court of competent jurisdiction in any of the following situations:
- 2.9.1  Does the debt collector communicate with any consumer at an unusual time or place or at a time or place that is known or should be known to be inconvenient such as between 9:00pm and 8:00am?
- 2.9.2  Do the debt collectors communicate with any consumer at work if the debt collector knows or has reason to know that the consumer's employer prohibits the consumer from receiving communications of that nature?
- 2.9.3  Do the debt collectors engage in any communications with any consumer after learning that the consumer is represented by an attorney with respect to the debt? If so, were contacts permissible because:
- 2.9.3.1  The debt collector did not know the attorney's name and address and could not readily ascertain that information
- 2.9.3.2  The attorney had failed to respond within a reasonable period of time to a communication from the debt collector
- 2.9.3.3  The attorney had consented to the debt collector's direct communication with the consumer

**LEGEND:**

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**Compliance Self-Assessment - Module 2 (Page 3 of 4):**[Prev Page](#)[Next Page](#)[Prev Module](#)[Next Module](#)**Communications in Connection with Debt Collection****Note: Provide data in all modules before completing assessment**

- 2.10  Do any of your company's debt collectors ever engage in any conduct that can harass, oppress, or be considered abusive to a debtor, including any of the following:
- 2.10.1  Using or threatening to use violence to physically harm a debtor or his or her reputation or property?
- 2.10.2  Using obscene or profane language or other language to abuse the hearer or reader?
- 2.10.3  Publishing a list of consumers who allegedly refuse to pay debts?
- 2.10.4  Advertising a debt for sale to coerce payment?
- 2.10.5  Causing a debtor's telephone to ring or engaging any person in telephone conversations repeatedly or continuously to annoy, abuse, or harass?
- 2.10.6  Communicating with a debtor in any other harassing, oppressive or abusive manner?
- 2.11  Do any of your company's debt collectors ever engage in any conduct that can harass, oppress, or be considered abusive to a debtor, including any of the following:
- 2.11.1  Misrepresenting the character, amount, or legal status of the debt?
- 2.11.2  Falsely representing or implying that nonpayment will result in the arrest of any person or the seizure, garnishment, attachment or sale of any person's property or wages (unless such action is lawful and the debt collector intends to take such action)?
- 2.11.3  Threatening to take any action that cannot legally be taken or that is not intended to be taken, such as threatening to make third-party disclosures about the existence of a debt that the debt collector does not actually intend to furnish? Falsely representing or implying that the sale, referral, or transfer of any interest in the debt will cause the consumer either to lose any claim or defense to payment or become subject to any practice prohibited by the FDCPA (15 U.S.C. 1692e(6))?
- 2.11.4  Falsely representing or implying that the consumer has committed a crime or other conduct to disgrace the consumer?

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**Compliance Self-Assessment - Module 2 (Page 4 of 4):**[Prev Page](#) [Save & Continue](#) [Save & Exit](#) [Next Module](#)**Communications in Connection with Debt Collection**

Note: Provide data in all modules before completing assessment

- 2.11.5  Threatening to communicate or communicating to any person the credit information which is known or which should be known to be false, including not communicating disputed debts as such (15 U.S.C. 1692e(8))?
- 2.11.6  Falsely representing or implying that accounts have been sold to innocent purchasers for value?
- 2.11.7  Using any other false representation or deceptive means to collect or attempt to collect any debt or obtain information concerning the debtor or another consumer?
- 2.12  Does your company have adequate policies and procedures in place to avoid disclosure of the existence of a debt?
- 2.13  Do your debt collectors communicate with any third parties to gain location information regarding the consumer's home address, phone number or place of employment, and if so:
- 2.13.1  Do the debt collectors refrain from revealing the debt collection company's name, unless specifically asked?
- 2.13.2  Do they indicate that the consumer owes a debt?
- 2.14  Do your debt collectors contact third parties by mail?
- 2.15  Do they refrain from using language or symbols on the envelopes that indicate that the communication relates to the collection of a debt, sending postcards, and contacting any third parties more than once (unless specifically requested or the collector believes that the information from the first contact was wrong or incomplete)?
- 2.16  Do your collectors know the consumer is represented by an attorney and can they readily ascertain the attorney's name and address? If so, do the debt collectors communicate ONLY with the attorney (unless the attorney fails to respond within a reasonable period of time to a communication from the debt collector)?

**LEGEND:** 0 = Not Compliant, 1 = Unsure, 2 = Slightly Agree, 3 = Agree, 4 = Strongly Agree, 5 = Fully Compliant





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**Compliance Self-Assessment - Module 3 (Page 1 of 5):**[Prev Page](#)[Next Page](#)[Prev Module](#)[Next Module](#)**Information Sharing, Privacy, and Interactions with Consumer Reporting Agencies****Note: Provide data in all modules before completing assessment**

- 3.1  Does your organization originate debt, purchase debt, or collect on behalf of another party that owns the debt?
- 3.2  For the debt that your organization originated or purchased and on which you collected or are collecting, does your firm use the Privacy of Consumer Financial Information examination procedures to assess compliance with the applicable requirements?
- 3.3  For debt that your organization does not own but collects or attempts to collect on behalf of another party, does your firm use the Privacy of Consumer Financial Information examination procedures to assess compliance with the "reuse and redisclosure"?
- 3.4  Regarding RCRA and Regulation V, does your organization obtain consumer reports from any consumer reporting agency?
- 3.5  Does your firm use the FCRA examination procedures to assess its compliance with the requirements on users of consumer reports?
- 3.5.1  Does your firm train employees regarding use of consumer reports?
- 3.5.2  Does your firm use the reports for any impermissible purpose?
- 3.5.3  Does your firm comply with duties of users regarding the addressing of discrepancies?
- 3.6  Does your organization furnish information about consumers because it furnishes information relating to consumers to one or more consumer reporting agencies for inclusion in a consumer report?
- 3.7  Does your organization provide information to a consumer reporting agency solely to obtain a consumer report in accordance with Sections 604(a) and (f) of the FCRA?
- 3.8  Is your organization acting as a "consumer reporting agency?"
- 3.9  Is your organization a "consumer" to whom the furnished information pertains?

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## Compliance Self-Assessment - Module 3 (Page 2 of 5):

### Information Sharing, Privacy, and Interactions with Consumer Reporting Agencies

[Prev Page](#)
[Next Page](#)
[Prev Module](#)
[Next Module](#)

Note: Provide data in all modules before completing assessment

- |        |                                |  |
|--------|--------------------------------|--|
| 3.10   | <input type="text" value="0"/> | Assess your compliance with Regulation V's requirements relating to your firm's accuracy and integrity by determining the following:   |
| 3.10.1 | <input type="text" value="0"/> | Does your firm have established and implemented reasonable written policies and procedures regarding the accuracy and integrity of the information relating to consumers that it furnishes to a consumer reporting agency? |
| 3.10.2 | <input type="text" value="0"/> | Are these policies and procedures appropriate to the nature, size, complexity, and scope of your organization's activities?  |
| 3.10.3 | <input type="text" value="0"/> | Do you consider the guidelines in Appendix E of Regulation V in developing its policies and procedures, and incorporated those guidelines that are appropriate?  |
| 3.10.4 | <input type="text" value="0"/> | Do you review these policies and procedures for accuracy and integrity periodically and updates them as necessary to ensure their continued effectiveness?   |
| 3.11   | <input type="text" value="0"/> | Does your firm internally assess the handling of "direct disputes" from consumer?  |
| 3.12   | <input type="text" value="0"/> | Does your organization hear complaints or disputes submitted by consumers concerning the accuracy of any information contained in a consumer report?   |
| 3.12.1 | <input type="text" value="0"/> | Does your organization receive complaints or disputes submitted consumers pertaining to an account or other relationship the furnisher has?  |
| 3.12.2 | <input type="text" value="0"/> | Does your firm have policies and procedures for properly identifying a direct dispute?   |
| 3.12.3 | <input type="text" value="0"/> | Does your firm conduct reasonable investigations of direct disputes from consumers where required, including a review of all relevant information provided by the consumer.  |
| 3.12.4 | <input type="text" value="0"/> | Do you report the results to the consumer within the required time frame?  |
| 3.12.5 | <input type="text" value="0"/> | Does your firm notify and provide corrected information to the consumer reporting agencies when the results of its investigation finds that inaccurate information was furnished to the consumer reporting agencies?       |

**LEGEND:**

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**Compliance Self-Assessment - Module 3 (Page 3 of 5):**[Prev Page](#)[Next Page](#)[Prev Module](#)[Next Module](#)**Information Sharing, Privacy, and Interactions with Consumer****Reporting Agencies****Note: Provide data in all modules before completing assessment**

- 3.13  Does your firm determine that certain disputes are frivolous or irrelevant?
- 3.14  Does your organization make these decisions for any of the following?
- 3.14.1  The consumer did not provide sufficient information to investigate the disputed information.
- 3.14.2  The direct dispute is substantially the same as a dispute previously submitted by or on behalf of the consumer.
- 3.14.3  The dispute is one to which the furnisher already has complied with the statutory or regulatory requirements.
- 3.14.4  The firm is not required to investigate the direct dispute because one or more of the exceptions listed below:
- 3.14.4.1  The firm notifies the consumer within five business days after finding the dispute frivolous or irrelevant
- 3.14.4.2  In the consumer notification the firm states the reasons for the findings and the information necessary to investigate the disputed information
- 3.15  Does your firm perform the following procedures within 90 days of furnishing information about a delinquent account that is being placed for collection, charged-off, or subjected to any similar action?
- 3.15.1  Notifies the consumer reporting agency of the month and year of commencement of a delinquency that immediately preceded the action?
- 3.15.2  Do you provide a different month and year of commencement of the delinquency unless the consumer identifies an error that requires correction?
- 3.15.3  Do you provide a notice to a consumer reporting agency of a dispute in each of the following situations?
- 3.15.3.1  A consumer has disputed the completeness or accuracy of any information the entity furnished?
- 3.15.3.2  The entity continues furnishing the information to a consumer reporting agency?

**LEGEND:**

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## Compliance Self-Assessment - Module 3 (Page 4 of 5):

### Information Sharing, Privacy, and Interactions with Consumer

#### Reporting Agencies

[Prev Page](#)
[Next Page](#)
[Prev Module](#)
[Next Module](#)

Note: Provide data in all modules before completing assessment

- 3.16  Does your organization have procedures in place to keep track of information that you have determined to be incomplete or inaccurate or that your collectors have been unable to verify in response to a dispute to prevent re-furnishing of such information as long as it remains incomplete, inaccurate, or unverifiable, consistent with the requirements of the law?
- 3.17  Does your firm have procedures in place to ensure that items of information blocked because of an alleged identify theft are not re-furnished to a consumer reporting agency after the entity is notified of a block by a consumer reporting agency?
- 3.18  Does your firm provide, to any consumer reporting agency any information alleged to result from identify theft after the consumer provides an identity theft report to the entity at the address specified by the entity, unless the furnisher subsequently knows or is informed by the consumer that the information is correct?
- 3.19  Does your firm sell, transfer for consideration, or place for collection any debt after being notified by a consumer reporting agency that the debt resulted from identity theft?
- 3.20  If your company is a debt collection agency, does your firm act on behalf of one or more third parties that are creditors or other users of a consumer report?
- 3.21  Does your firm have policies and procedures in place to use if it is notified that any information relating to the debt it is attempting to collect may be fraudulent or may be the result of identity theft?
- 3.22  Do you notify the third party for whom you are collecting that the information may be fraudulent or the result of identify theft?
- 3.23  Do you, upon request, provide the consumer to whom the dept purportedly relates all information to which the consumer would otherwise be entitled if the consumer were not a victim of identity theft, but wicted to dispute the debt under applicable provisions of law?

#### LEGEND:

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**Compliance Self-Assessment - Module 3 (Page 5 of 5):****Information Sharing, Privacy, and Interactions with Consumer****Reporting Agencies**[Prev Page](#) [Save & Continue](#) [Save & Exit](#) [Next Module](#)**Note: Provide data in all modules before completing assessment**

- 3.24  Does your firm, if the furnisher, provide an address in a consumer report relating to the consumer or otherwise clearly and conspicuously specified an address for submitting direct disputes in writing or electronically?
- 3.24.1  If so, do you accept and investigate all direct disputes submitted to the specified address?
- 3.24.1  Do you accept and investigate all direct disputes submitted to any or its business addresses?

**LEGEND:** 0 = Not Compliant, 1 = Unsure, 2 = Slightly Agree, 3 = Agree, 4 = Strongly Agree, 5 = Fully Compliant



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**Compliance Self-Assessment - Module 4 (Page 1 of 5):****Consumer Compiants, Dispute Resolution, and Debt Validation**[Prev Page](#)[Next Page](#)[Prev Module](#)[Next Module](#)

Note: Provide data in all modules before completing assessment

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4.1.3  Some text

4.1.4  Some text

4.1.5  Some text

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4.4.1  Some text

4.4.2  Some text

4.4.2.1  Some text

4.4.2.2  Some text

**LEGEND:**

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## Compliance Self-Assessment - Module 5 (Page 1 of 5): Payment Processing and Account Maintenance

[Prev Page](#)[Next Page](#)[Prev Module](#)[Next Module](#)

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## Compliance Self-Assessment - Module 6 (Page 1 of 5): Equal Credit Opportunity Act

[Prev Page](#)[Next Page](#)[Prev Module](#)[Next Module](#)

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## Compliance Self-Assessment - Module 7 (Page 1 of 5): Litigation Practices, Repossession, and Time-Barred Debt

[Prev Page](#)[Next Page](#)[Prev Module](#)[Next Module](#)

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**CFPB Compliance - Owner Complaint Workflow (Page 1 of 2):**[Go to Page 2](#)[Search](#) [Clear](#)**Note: Enter/Select at least 1 criteria to search.****Debtor & Debt Information**

Agency Name:

Consumer Account #:

Last Name:

First Name:

Address:

City:

State:

Zip:

Home Phone:

Work Phone:

Mobile Phone:

Last 4 of SSN:

Verified Debtor Identity?:

Best Contact Method:

Best Contact Time:

Creditor Name:

Debt Product:

Debt Balance at Purchase:

Debt Balance (Current):

Dispute Debt?:

Dispute Debt Amount?:

Dispute Debt Due Date?: