



# **ALTA BEST PRACTICES MATURITY MODEL**

The Maturity Model is designed to help title insurance and settlement companies determine their compliance with the Best Practices.

The Maturity Model is comprised of seven tables, one for each pillar of the Best Practices. Each table highlights the policies outlined in ALTA's Title Insurance and Settlement Company Best Practices (labeled "Best Practice"). Each table also contains five columns measuring the company's adherence to the Best Practices. These columns have the following labels:

- ***Ad Hoc:*** company has not yet established any policies or procedures
- ***Planning:*** company is developing compliance. Procedures and controls exist but are not documents, or procedures and controls are documented by not completely implemented.
- ***Defined:*** company is partially compliant with the Best Practices. Some procedures and controls exist and are documented, but are not completely being followed.
- ***Managed:*** company is substantially compliant with the Best Practices. Procedures and controls exist and are documented, but are not being followed consistently.
- ***Optimized:*** company is fully compliant with the Best Practices. Procedures and controls exist, are documented, and are being followed consistently.

Applicable definitions for this Maturity Model:

- **Implemented:** the process/procedure has been established, is documented, and is required by the Company
- **Followed:** the process/procedure has been established, is documented, is required by the Company, and is being performed as intended

The Maturity Model features differentiating characteristics to help companies define where its policies and procedures fit within the Best Practices and the steps it must do to become fully compliant with the Best Practices. This Maturity Model also allows companies to represent progress towards Best Practices compliance.

## Instructions

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You should use this Maturity Model following an assessment of your company's compliance with the Best Practices using ALTA's Title Insurance and Settlement Company Best Practices and Assessment Procedures. Based on the results of your assessment, identify the benchmark compliance level that best describes your company's policies and procedures for each Best Practice.

Within the Maturity Model Summary, you should mark with an "X" the benchmark compliance level that best describes your company's procedures for each Best Practice. You should also indicate the steps your company is taking to improve its compliance with each Best Practice within the Progress Plan column. Identifying where your company lies on this Maturity Model will help you identify any next steps your company can take to fully comply with the Best Practices. Upon completion of this summary, you will have a high-level report that indicates your company's compliance with the Best Practices.

We hope you will find this Maturity Model a helpful tool as you evaluate your company's policies and procedures and strive to implement practices that will help your company succeed in the industry. Additional resources on ALTA's Best Practices, including ALTA's Maturity Model Explainer, are available on our website at <http://www.alta.org/bestpractices>. Any questions regarding this Maturity Model may be submitted to [bestpractices@alta.org](mailto:bestpractices@alta.org).

## Maturity Model Summary

ALTA Best Practices	Benchmark Compliance Levels					Progress Plan
	Ad Ho c	Pla nni ng	Def ine d	Ma nag ed	Opt imi zed	
Pillar 1						
Establish and maintain current license(s) as required to conduct the business of title insurance and settlement services						
Establish and maintain appropriate compliance with ALTA’s Policy Forms Licensing requirement						
Pillar 2						
Written procedures and controls exist for escrow trust accounts						
Escrow funds and operating accounts are separately maintained						
Escrow Trust Accounts are prepared with Trial Balances, listing all file/escrow balances						
Escrow Trust Accounts are reconciled						
Escrow Trust Accounts are properly identified						
Outstanding file balances are documented						
Transactions are conducted by authorized employees only						
Escrow Trust Accounts are maintained in Federally Insured Financial Institutions						
Utilize Positive Pay or Reverse Positive Pay, if available in the marketplace, and have policies and procedures in place that prohibit or control the use of Automated Clearing House and international wires						

Background Checks are completed						
Ongoing training is conducted for employees involved in the management of escrow funds and escrow accounting						
<b>Pillar 3</b>						
Written privacy and information security program exists to protect non-public personal information (NPI) as required by local, state and federal law						
Physical security of Non-public Personal Information						
Network security of Non-public Personal Information						
Disposal and maintenance of Non-public Personal Information						
Establish a disaster management plan						
Appropriate management and training of employees to help ensure compliance with Company's information security program						
Oversight of service providers to help ensure compliance with Company's information security program						
Audit and oversight procedures to help ensure compliance with a Company's information security program						
Notification of security breaches to customers and law enforcement						
<b>Pillar 4</b>						
Procedures related to recording of documents						
Procedures related to pricing						
Procedures related to the settlement process						
Procedures related to third-party signing professionals						

Pillar 5						
Adopt and maintain written procedures related to title policy production, delivery, reporting and premium remittance						
Title policy production and delivery; premium reporting and remittance						
Pillar 6						
Maintain appropriate professional liability insurance and fidelity coverage						
Pillar 7						
Adopt and maintain written procedures for resolving consumer complaints						

## ALTA Best Practices Maturity Model

Pillar 1						
Best Practice	Related Assessment Procedures	Benchmark Compliance Levels				
		Ad Hoc	Planning	Defined	Managed	Optimized
Establish and maintain current license(s) as required to conduct the business of title insurance and settlement services	1.01, 1.02	Licenses and corporate registrations are not available and active for all states and jurisdictions in which the company operates on the assessment date				Licenses and corporate registrations are available and active for all states and jurisdictions in which the company operates on the assessment date
Establish and maintain appropriate compliance with ALTA's Policy Forms Licensing requirement	1.03	Company does not maintain active ALTA Policy Forms License				Company maintains an active ALTA Policy Forms License



## Pillar 2

Best Practice	Related Assessment Procedures	Benchmark Compliance Levels				
		Ad Hoc	Planning	Defined	Managed	Optimized
Written procedures and controls exist for Escrow Trust Accounts	2.01	Neither written procedures nor controls exist	Procedures and controls exist but are not documented <u>or</u> procedures and controls are documented but are not completely implemented	Some procedures and controls exist and are documented, but are not completely being followed	Procedures and controls exist and are documented, but are not being followed consistently	Procedures and controls exist, are documented, and are being followed consistently
Escrow funds and operating accounts are separately maintained	2.03n	Escrow and fiduciary funds are comingled with operating accounts		Underwriter premiums and/or recording fees are comingled with operating accounts		No escrow or fiduciary funds are comingled with operating accounts
Escrow Trust Accounts are prepared with Trial Balances, listing all open file/escrow balances	2.03e, 2.03h, 2.03l, 2.03m	No escrow accounts or fiduciary accounts are prepared with a Trial Balance	Some escrow accounts and fiduciary accounts are prepared with a Trial Balance	Most Escrow accounts and fiduciary accounts are prepared with a Trial Balance; however, underwriter premium and/or recording account may or may not be prepared with a Trial Balance	All escrow accounts and fiduciary accounts are prepared with a Trial Balance, including recording account, but not underwriter premium account or underwriter account but not the recording account; however, compensating controls are in place	All escrow accounts or fiduciary accounts are prepared with Trial Balances



## Pillar 2

Best Practice	Related Assessment Procedures	Benchmark Compliance Levels				
		Ad Hoc	Planning	Defined	Managed	Optimized
Escrow Trust Accounts are reconciled	2.03a, 2.03b, 2.03c, 2.03d, 2.03e, 2.03i, 2.03o, 2.03p	Escrow and fiduciary accounts are not reconciled	Escrow accounts and fiduciary accounts undergo Three-Way Reconciliations less than monthly	Escrow accounts and fiduciary accounts undergo Three-Way Reconciliations monthly; however, segregation of duties may not exist and/ or are insufficient	Escrow accounts and fiduciary accounts undergo Three-Way Reconciliations monthly and segregation of duties are in place; however, reconciliations are not reviewed by management and/or daily reconciliation of receipts and disbursements is not performed	Escrow accounts and fiduciary accounts undergo Three-Way Reconciliations monthly, segregation of duties are in place, reconciliations are reviewed by management, and daily reconciliations of receipts and disbursements are performed
Escrow Trust Accounts are properly identified	2.02, 2.03f, 2.04	Escrow and fiduciary accounts are not properly identified as “escrow” or “trust”		Escrow and fiduciary accounts are properly identified as “escrow” or “trust,” however, not all account-related documentation is consistently identified as such		All escrow trust accounts and fiduciary accounts are properly identified as “escrow” or “trust” and all related documentation is also properly identified
Outstanding file balances are documented	2.03j, 2.03k, 2.03l	No documentation exists for the outstanding file balances for escrow accounts and fiduciary accounts	Some documentation exists for the outstanding file balances for escrow accounts and fiduciary accounts		Most escrow and fiduciary accounts have documentation of outstanding file balances	All escrow accounts or fiduciary accounts are prepared with documented outstanding file balances

## Pillar 2

Best Practice	Related Assessment Procedures	Benchmark Compliance Levels				
		Ad Hoc	Planning	Defined	Managed	Optimized
Transactions are conducted by authorized employees only	2.02, 2.03g	There are no controls in place to prevent unauthorized employees from conducting transactions	There are some controls in place to prevent unauthorized employees from conducting transactions; however, terminated employees are not immediately deleted as listed signatories on all bank accounts		There are controls in place to prevent unauthorized employees from conducting transactions and terminated employees are immediately deleted as listed signatories on all bank accounts; however, appropriate authorization levels are not reviewed annually	All transactions are performed by authorized employees only and authorization levels are annually reviewed with terminated employees immediately deleted as listed signatories on all bank accounts.
Escrow Trust Accounts are maintained in Federally Insured Financial Institutions	2.05	Escrow Trust Accounts are not maintained in Federally Insured Financial Institutions				All Escrow Trust Accounts are maintained in Federally Insured Financial Institutions
Utilize Positive Pay or Reverse Positive Pay, if available in the marketplace, and have policies and procedures in place that prohibit or control the use of Automated Clearing House (ACH) and international wires	2.06a, 2.06b	Positive pay, reverse positive pay, ACH controls and/or international wire controls are not used on any accounts	Positive pay, reverse positive pay, ACH controls and/or international wire controls are not used on all accounts	Positive pay, reverse positive pay, ACH controls and international wire controls are used on some accounts	Positive pay, reverse positive pay, ACH controls and international wire controls are used on most accounts	Positive pay and reverse positive pay if available in the local marketplace), and ACH controls and international wire controls are used on all accounts

## Pillar 2

Best Practice	Related Assessment Procedures	Benchmark Compliance Levels				
		Ad Hoc	Planning	Defined	Managed	Optimized
Background Checks are completed	2.02c	No Background Checks are performed on employees with access to customer funds		Background Checks are performed at hiring, but are not routinely updated for employees with access to customer funds		All employees with access to customer funds have undergone Background Checks either at hiring or within the past three years and Background Checks are updated at least every three years
Ongoing training is conducted for employees involved in the management of escrow funds and escrow accounting	2.02d	No training is conducted for employees involved in the management of escrow funds and/or escrow accounting	Training is conducted for some employees involved in the management of escrow funds and escrow accounting	Training is conducted for most employees involved in the management of escrow funds and escrow accounting	Training is conducted for all employees involved in the management of escrow funds and escrow accounting, but such training is not ongoing	Ongoing training is conducted for all employees involved in the management of escrow funds and escrow accounting

## Pillar 3

Best Practice	Related Assessment Procedures	Benchmark Compliance Levels				
		Ad Hoc	Planning	Defined	Managed	Optimized
Written privacy and information security program exists to protect non-public personal information (NPI) as required by local, state and federal law	3.01, 3.03, 3.15, 3.16	No written program exists	Program exists but is not documented <u>or</u> program is documented but not implemented	Written program exists and is implemented but does not cover all necessary aspects to protect NPI	Written program exists and is implemented but is not being followed consistently	Written program exists, is implemented, and is followed consistently
Physical security of NPI	3.07a, 3.07b, 3.07d, 3.08, 3.09, 3.11	Company does not meet any of the below criteria: <ul style="list-style-type: none"> <li>Access to NPI is restricted to authorized employees who have undergone background checks performed upon hiring and every 3 years</li> <li>Use of removable media is restricted and controlled</li> <li>Procedures are in place to utilize only secured delivery methods are used when transmitting NPI</li> </ul>	Company partially meets one or more of the below criteria: <ul style="list-style-type: none"> <li>Access to NPI is restricted to authorized employees who have undergone background checks performed upon hiring and every 3 years</li> <li>Use of removable media is restricted and controlled</li> <li>Procedures are in place to utilize only secured delivery methods are used when transmitting NPI</li> </ul>	Company meets one of the below criteria and partially meets one or more of the remaining criteria: <ul style="list-style-type: none"> <li>Access to NPI is restricted to authorized employees who have undergone background checks performed upon hiring and every 3 years</li> <li>Use of removable media is restricted and controlled</li> <li>Procedures are in place to utilize only secured delivery methods are used when transmitting NPI</li> </ul>	Company meets two of the below criteria and partially meets the third criteria: <ul style="list-style-type: none"> <li>Access to NPI is restricted to authorized employees who have undergone background checks performed upon hiring and every 3 years</li> <li>Use of removable media is restricted and controlled</li> <li>Procedures are in place to utilize only secured delivery methods are used when transmitting NPI</li> </ul>	Company meets all three of the below criteria: <ul style="list-style-type: none"> <li>Access to NPI is restricted to authorized employees who have undergone background checks performed upon hiring and every 3 years</li> <li>Use of removable media is restricted and controlled</li> <li>Procedures are in place to utilize only secured delivery methods are used when transmitting NPI</li> </ul>

## Pillar 3

Best Practice	Related Assessment Procedures	Benchmark Compliance Levels				
		Ad Hoc	Planning	Defined	Managed	Optimized
Network security of NPI	3.06, 3.07c, 3.07d, 3.07e, 3.09, 3.10, 3.12	<p>Company does not meet any of the below criteria:</p> <ul style="list-style-type: none"> <li>• Maintain and secure access to Company information technology</li> <li>• Develop guidelines for the appropriate use of Company information technology.</li> <li>• Ensure secure collection and transmission of NPI</li> </ul>	<p>Company partially meets one or more of the below criteria:</p> <ul style="list-style-type: none"> <li>• Maintain and secure access to Company information technology</li> <li>• Develop guidelines for the appropriate use of Company information technology.</li> <li>• Ensure secure collection and transmission of NPI</li> </ul>	<p>Company meets one of the below criteria and partially meets the one or more of the remaining:</p> <ul style="list-style-type: none"> <li>• Maintain and secure access to Company information technology</li> <li>• Develop guidelines for the appropriate use of Company information technology.</li> <li>• Ensure secure collection and transmission of NPI</li> </ul>	<p>Company meets two of the below criteria and partially meets the third criteria:</p> <ul style="list-style-type: none"> <li>• Maintain and secure access to Company information technology</li> <li>• Develop guidelines for the appropriate use of Company information technology.</li> <li>• Ensure secure collection and transmission of NPI</li> </ul>	<p>Company meets all three of the below criteria:</p> <ul style="list-style-type: none"> <li>• Maintain and secure access to Company information technology</li> <li>• Develop guidelines for the appropriate use of Company information technology.</li> <li>• Ensure secure collection and transmission of NPI</li> </ul>
Disposal of and maintenance of NPI	3.17	No policies or procedures in place over record disposal and maintenance	Policies and procedures exists but are not documented or are not implemented	Policies and procedures are documented but are not followed	Policies and procedures have been implemented, but are not consistently followed; third party vendor is actively managed	Policies and procedures are documented, implemented, and followed consistently regarding the Company's disposal of NPI in a manner that protects against unauthorized access to or use of the information

## Pillar 3

Best Practice	Related Assessment Procedures	Benchmark Compliance Levels				
		Ad Hoc	Planning	Defined	Managed	Optimized
Establish a disaster management plan	3.13	A disaster management and business resumption plan does not exist	Some of the disaster management and business resumption procedures exist but are not documented or documented but not implemented	Some portions of the disaster management and business resumption plan exist and are documented, but are not implemented or tested	A disaster management and business resumption plan exist, are documented and implemented, however, they are not routinely tested	A disaster management and business resumption plan exist, are documented, implemented and tested on a routine basis
Appropriate management and training of employees to help ensure compliance with Company's information security program	3.02, 3.05	Training is not conducted for any employees on the Company's information security program	Training has been developed but is not conducted for employees	Training is conducted for some employees on the Company's information security program	Training is conducted for most employees on the Company's information security program	Training is conducted for all employees on the Company's information security program
Oversight of service providers to help ensure compliance with Company's information security program	3.14	No oversight of service providers	Oversight of service providers exists but there is no evidence of compliance with the Company's information security program on an ongoing basis	Oversight of service providers exists and there is some evidence of compliance with the Company's information security program on an ongoing basis	Oversight of service providers exists and adequately demonstrates evidence of compliance with the Company's information security program on a periodic basis	Oversight of service providers exists and adequately demonstrates evidence of compliance with the Company's information security program on an ongoing basis

## Pillar 3

Best Practice	Related Assessment Procedures	Benchmark Compliance Levels				
		Ad Hoc	Planning	Defined	Managed	Optimized
Audit and oversight procedures to help ensure compliance with a Company's information security program	3.04	No audit and oversight procedures exist	Oversight procedures are in development but not formalized	Oversight exists for the Company's information security program but audits are not being conducted	Oversight exists for the Company's information security program but audits are not being conducted on an ongoing basis	Oversight exists and audits ensure the Company's information security program is in compliance on an ongoing basis
Notification of security breaches to customers and required parties	3.10c, 3.15	Company has no monitoring in place to discover a security breach	Company is monitoring for security breaches but has no procedures to notify customers and required parties	Company is monitoring for security breaches and has a procedure for notification but is not following or is not followed timely.		Company is monitoring for security breaches, has notification procedures in place, and is timely notifying all parties of breaches, if occurred

## Pillar 4

Best Practice	Related Assessment Procedures	Benchmark Compliance Levels				
		Ad Hoc	Planning	Defined	Managed	Optimized
Procedures related to recording of documents	4.01, 4.03	Neither written procedures nor controls exist	Some procedures and controls related to: <ul style="list-style-type: none"> <li>submitting or shipping documents for recording as required</li> <li>tracking recordings</li> <li>addressing rejected documents, and</li> <li>verifying recordings were completed and records of the recording are maintained</li> </ul> may be incomplete or not fully documented	Procedures and controls related to: <ul style="list-style-type: none"> <li>submitting or shipping documents for recording as required</li> <li>tracking recordings</li> <li>addressing rejected documents, and</li> <li>verifying recordings were completed and records of the recording are maintained</li> </ul> exist and are documented, but are not being followed	Procedures and controls exist related to: <ul style="list-style-type: none"> <li>submitting or shipping documents for recording as required</li> <li>tracking recordings</li> <li>addressing rejected documents, and</li> <li>verifying recordings were completed and records of the recording are maintained</li> </ul> exist and are documented, but are not being followed consistently	Procedures and controls are followed consistently and effectively related to: <ul style="list-style-type: none"> <li>submitting or shipping documents for recording as required</li> <li>tracking recordings</li> <li>addressing rejected documents, and</li> <li>verifying recordings were completed and records of the recording are maintained</li> </ul>
Procedures related to pricing	4.04	Neither written procedures nor controls exist	Some procedures and controls related to: <ul style="list-style-type: none"> <li>rates,</li> <li>discounts,</li> <li>review of charges, and</li> <li>timely refunds</li> </ul> exist but may be incomplete or not fully documented	Procedures and controls related to: <ul style="list-style-type: none"> <li>rates,</li> <li>discounts,</li> <li>review of charges, and</li> <li>timely refunds</li> </ul> exist and are documented, but are not being followed	Procedures and controls related to: <ul style="list-style-type: none"> <li>rates,</li> <li>discounts,</li> <li>review of charges, and</li> <li>timely refunds</li> </ul> exist and are documented, but are not being followed consistently	Procedures and controls are followed consistently and effectively related to: <ul style="list-style-type: none"> <li>rates,</li> <li>discounts,</li> <li>review of charges, and</li> <li>timely refunds</li> </ul>



## Pillar 4

Best Practice	Related Assessment Procedures	Benchmark Compliance Levels				
		Ad Hoc	Planning	Defined	Managed	Optimized
Procedures related to the settlement process	4.02	Neither written procedures nor controls exist related to: • wiring funds, • receiving funds, • disbursing funds, in accordance with closing instructions and the settlement statement	Some procedures and controls exist related to: • wiring funds, • receiving funds, • disbursing funds, in accordance with closing instructions and the settlement statement but are not documented <u>or</u> procedures and controls are documented but are not implemented	Procedures and controls exist related to: • wiring funds, • receiving funds, • disbursing funds, in accordance with closing instructions and the settlement statement and are documented, but are not being followed	Procedures and controls exist related to: • wiring funds, • receiving funds, • disbursing funds, in accordance with closing instructions and the settlement statement and are documented, but are not being followed consistently	Procedures and controls are followed consistently and effectively related to: • wiring funds, • receiving funds, • disbursing funds, in accordance with closing instructions and the settlement statement, are documented

## Pillar 4

Best Practice	Related Assessment Procedures	Benchmark Compliance Levels				
		Ad Hoc	Planning	Defined	Managed	Optimized
Procedures related to third-party signing professionals	4.05	Neither written procedures nor controls exist	<p>Some procedures and controls related to:</p> <ul style="list-style-type: none"> <li>• Errors and Omissions insurance coverage</li> <li>• Notary surety bond (if required)</li> <li>• Licensure or recognized and verifiable industry designation</li> <li>• Acknowledgement of compliance with Company's instructions and information security program</li> </ul> <p>exist but are not documented <u>or</u> procedures and controls are documented but are not implemented</p>	<p>Procedures and controls related to:</p> <ul style="list-style-type: none"> <li>• Errors and Omissions insurance coverage</li> <li>• Notary surety bond (if required)</li> <li>• Licensure or recognized and verifiable industry designation</li> <li>• Acknowledgement of compliance with Company's instructions and information security program</li> </ul> <p>exist and are documented, but are not being followed</p>	<p>Procedures and controls related to:</p> <ul style="list-style-type: none"> <li>• Errors and Omissions insurance coverage</li> <li>• Notary surety bond (if required)</li> <li>• Licensure or recognized and verifiable industry designation</li> <li>• Acknowledgement of compliance with Company's instructions and information security program</li> </ul> <p>exist and are documented, but are not being followed consistently</p>	<p>Either third-party signing professionals engaged by the Company are directly employed by a Best Practices compliant company <u>or</u> procedures and controls are followed consistently and effectively related to:</p> <ul style="list-style-type: none"> <li>• Errors and Omissions insurance coverage</li> <li>• Notary surety bond (if required)</li> <li>• Licensure or recognized and verifiable industry designation</li> <li>• Acknowledgement of compliance with Company's instructions and information security program</li> </ul>

## Pillar 5

Best Practice	Related Assessment Procedures	Benchmark Compliance Levels				
		Ad Hoc	Planning	Defined	Managed	Optimized
Adopt and maintain written procedures related to title policy production, delivery, reporting and premium remittance	5.01	Neither written procedures nor controls exist	Procedures and controls exist but are not documented <u>or</u> procedures and controls are documented but are not completely implemented	Some procedures and controls exist and are documented, but are not completely being followed	Procedures and controls exist and are documented, but are not being followed consistently	Procedures and controls exist, are documented, and are being followed consistently
Title policy production and delivery; premium reporting and remittance	5.02	Company does not meet any of the below criteria: <ul style="list-style-type: none"> <li>timely title policy production</li> <li>timely title policy delivery</li> <li>timely policy reporting</li> <li>timely premium remittance</li> </ul>	Company meets one of the below criteria and partially meets one or more of the remaining criteria: <ul style="list-style-type: none"> <li>timely title policy production</li> <li>timely title policy delivery</li> <li>timely policy reporting</li> <li>timely premium remittance</li> </ul>	Company meets two of the below criteria and partially meets one or more of the remaining criteria: <ul style="list-style-type: none"> <li>timely title policy production</li> <li>timely title policy delivery</li> <li>timely policy reporting</li> <li>timely premium remittance</li> </ul>	Company meets three of the below criteria and partially meets the remaining criteria: <ul style="list-style-type: none"> <li>timely title policy production</li> <li>timely title policy delivery</li> <li>timely policy reporting</li> <li>timely premium remittance</li> </ul>	Company meets all four of the below criteria: <ul style="list-style-type: none"> <li>timely title policy production</li> <li>timely title policy delivery</li> <li>timely policy reporting</li> <li>timely premium remittance</li> </ul>

## Pillar 6

Best Practice	Related Assessment Procedures	Benchmark Compliance Levels				
		Ad Hoc	Planning	Defined	Managed	Optimized
Maintain appropriate professional liability insurance and fidelity coverage	6.01	No coverages exist		Some but not all required coverages exist		Appropriate and/or required professional liability insurance and fidelity coverage are in place

## Pillar 7

Best Practice	Related Assessment Procedures	Benchmark Compliance Levels				
		Ad Hoc	Planning	Defined	Managed	Optimized
Adopt and maintain written procedures for resolving consumer complaints	7.01, 7.02	Neither written controls nor procedures related to tracking and/or resolving consumer complaints exist	Some controls and procedures related to: <ul style="list-style-type: none"> <li>• complaint intake,</li> <li>• documentation tracking log,</li> <li>• setting a single point of contact for resolving complaints</li> </ul> exist but may be incomplete or not fully documented	Controls and procedures related to: <ul style="list-style-type: none"> <li>• complaint intake,</li> <li>• documentation tracking log,</li> <li>• setting a single point of contact for resolving complaints</li> </ul> exist and are documented, but are not being followed	Controls and procedures and related to: <ul style="list-style-type: none"> <li>• complaint intake,</li> <li>• documentation tracking log,</li> <li>• setting a single point of contact for resolving complaints</li> </ul> exist and are documented, but are not being followed consistently	Controls and procedures related to: <ul style="list-style-type: none"> <li>• complaint intake,</li> <li>• documentation tracking log,</li> <li>• setting a single point of contact for resolving complaints</li> </ul> exist, are documented, and are being followed consistently