AGENT CMS USER GUIDE

Welcome to the User Guide to WFG National Title Insurance Company's Compliance Management System (CMS). WFG developed the CMS to help agents respond to increasing demands from lenders for evidence that their vendors comply with expanded consumer protection requirements. The online CMS platform provides the ingredients agents need to create a full compliance management program, along with step-by-step guidance on how to implement the program and integrate compliance into their business operations.

Why a CMS? As you know, the creation of the Consumer Financial Protection Bureau (CFPB) and the stricter regulations the agency has issued, have created a sea change in the regulatory environment. WFG'S CMS provides on-line resources agents can use to become educated about compliance management procedures and create a personalized compliance program to share with lenders, regulators, and other interested parties. Once created and implemented, this compliance program, can become an effective marketing tool agents can use to distinguish themselves from competitors.

The heart of our CMS website is a library of compliance policy templates and related material that agents can customize and brand as their own. The policy templates were developed by industry veterans who used their years of experience with lender audits to develop our content. We've tried to make the site intuitive and user-friend, with no frills but plenty of instruction that will enable anyone proficient in Microsoft Word to create a comprehensive compliance program. We've also enabled agents to "overbrand" our compliance policy templates by adding add their agency information to the WFG branding that already appears.

The CMS will evolve in both content and functionality over time. We will be working collaboratively with agents to add new items to our library as more lenders clarify their compliance requirements for title agents. The value of the CMS for agents: you don't have to create a compliance program from scratch; we've laid the groundwork for you. Equally important, our standardized compliance program puts WFG and its agents at the forefront of efforts to safeguard lenders and consumers.

Where is the CMS? The CMS is housed online at our new WFG Agent website at **www.wfgagent.com**, which is protected behind a user name and password so that only WFG agents may view it. A screenshot of its initial design can be seen on the right.

What are my system requirements to use the CMS? You can access the website through all major web browsers. Please note that our Policy templates were created in a version of Microsoft Word 2007 or later. If you have system compatibility issues, downloading Microsoft Office Compatibility Pack from the Microsoft website may help. Also note that our system is not compatible with Open Office at this time.
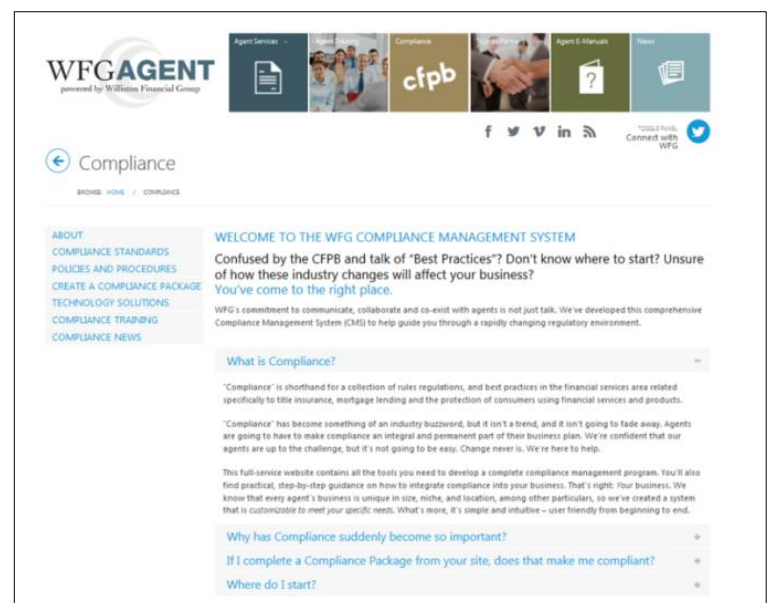
A snapshot of the CMS "home page" on www.wfgagent.com.

What is the difference between "CMS" and "Compliance Package?" These are similar concepts that we define differently, as follows:

- **COMPLIANCE MANAGEMENT SYSTEM ("CMS" or "System"):** Refers to all of the compliance related material that WFG creates internally and disseminates, markets, and offers to our agents. The CMS is a website where all of WFG's agency compliance information is housed.
- **COMPLIANCE PACKAGE ("CP" or "Package"):** This is the external compliance program that *agents* create using WFG materials. It is a manual or portfolio agents can customize, print and give to lenders or regulators. The compliance package even has its own logo (see graphic on right).

COMPLIANCE PACKAGE
powered by WFG National Title Insurance Company®

What does the CMS entail? You will find seven links on the site, describing its key features:

1. **ABOUT:** Describing what a Compliance Package is, why it is important, and why agents need to create one as soon as possible. This section answers the question we get most often from agents — "Where do I start to become compliant?" Our solution is a 15-step checklist compiled from real-word lender review experience. This section also introduces users to WFG's Compliance Department.

2. **COMPLIANCE STANDARDS**: Providing a brief, basic history of Dodd-Frank and the creation of the CFPB, explaining why compliance has become so crucial for title agents. This section also links to ALTA's "Self-Assessment," enabling agents who belong to ALTA to complete this useful exercise.

3. **POLICIES AND PROCEDURES:** This is the heart of our site. You will find, in fillable Word format, approximately 31 "Policies and Procedures" you can brand and use as your own. Each word document field has "triggers" explaining how to complete that particular field. You can use as few or as many of these templates as you'd like. This is an a la carte menu from which agents can select and download the policies appropriate for them.

A sample of one of our Policy templates.

4. **CREATE A COMPLIANCE PACKAGE:** The customizable and brandable policy templates we're providing will go a long way toward demonstrating your compliance efforts, but they won't create a complete compliance package. Many lenders will request an array of supporting documents and many policies require logs, lists, forms and other supplemental material. The CMS provides templates for much of the supporting documentation many lenders want to

see, including overviews of the agency, biographies of key staff, and organizational charts. Combining these extras with the policies and procedures will create a complete, polished compliance portfolio that will demonstrate your professionalism as well as your understanding of and commitment to compliance.

A sample of our Additional Documentation pieces, above, and one of our Packaging Documents, to the right.

5. **TECHNOLOGY SOLUTIONS:** This portal connects agents with the technology solutions that will help streamline their compliance procedures. You will find information about the vendors and the compliance tasks their products and services target. Most of the vendors offer a discounted rate for WFG agents.

6. **COMPLIANCE TRAINING:** This area provides the information and resources agents need to train their staffs on compliance procedures. We'll be supplementing the webinars and power points currently on the site by adding training modules targeting key compliance areas.

7. **COMPLIANCE NEWS:** We will update this area of the site regularly with news about CFPB initiatives and other regulations, statutes and court decisions that might affect agents' compliance programs.

What kinds of documents will I find on the CMS? There are three types of documents in the CMS Library:

1. **POLICY TEMPLATES** – These are individual and customizable compliance policies. As of our launch date in May 2014, there were 31 templates. (See the attachment "CMS Library.")

2. **ADDITIONAL DOCUMENTATION** – These are logs, lists, maps and other forms supplementing the Policy templates. As of our launch date in May 2014, there were 26 items in this category. (See the attachment "CMS Library.")

3. **PACKAGING DOCUMENTS** – These are the "finishing touches" agents can use to package their policies, procedures and supplemental material in a professional-looking compliance portfolio. As of this writing, they include: (1) Cover Page, (2) Introduction, (3) Table of Contents, (4) Agency Overview, (5) Office Locations, (6) Staff Biographies, and (7) Organizational Chart.

What if I have technical issues with the CMS site? We have an agency compliance email box devoted to assisting agents with CMS issues. The address is: **agencycompliance@wfgnationaltitle.com**.

What if I need help formatting Policy templates? We have provided detailed directions on how to work with the Microsoft Word fillable forms on the CMS site. The "Working in Fillable Forms" Attachment at the end of this document provides additional information. If you have problems that are not resolved quickly by the training we've provided, please seek assistance at **agencycompliance@wfgnationaltitle.com**.

WORKING IN FILLABLE FORMS

How do I start using WFG's Policy templates? When you click on the dropdown in the "Policies and Procedures" area of the CMS site, you'll see a list of compliance policy templates. The templates are arranged alphabetically by subject and formatted in Microsoft Word. They are not complicated. They were designed to be simple and intuitive to use. You can download them individually to your system and begin using the templates immediately, hassle-free. Each is "locked" (see below) with form fields that contain "triggers" for completing phrases describing how their business operates. You can also over-brand the document with your logo and contact information.

How do I use fillable forms in Microsoft Word? When you open any of our Microsoft Word templates, you'll be taken to the first form field available for completion. Simply start typing! When you've completed that field, press the "tab" key to move to the next field. Each customizable field in the document is highlighted in gray. If you do not plan to enter information in a given field, you must press the spacebar, so the trigger language does not appear in your printed document. Please note that the gray highlight only appears on screen as a helpful tool; when a completed template is printed, the gray will not show.

The footer at the end of each policy includes a "Review Date" and an "Approved Date." The Review Date will change every time you review the Policy. If you review compliance Policies annually, the date will change every year. The Approved Date is the date the Policy was first created and will change whenever it is changed. One very important caveat to keep in mind as you complete the forms: The final product should describe the compliance measures you *actually* have in place at the time, not the measures you think lenders want to see.

How do I lock or unlock (protect/unprotect) a fillable form? We wanted to make our forms as user-friendly as possible. One way we've done this is by "locking" or "protecting" them so you can simply tab through and complete the fields that are customizable. As we learned through testing, not locking them can create formatting headaches when typing information in the form fields. However, you may need the flexibility to change margins, add more detailed information, or remove tasks that don't pertain to your company. Furthermore, you will almost certainly need to unlock and lock the "Packaging Documents" to personalize them, which means you'll have to move easily in and out of Microsoft Word's form field protection. You can unlock the form ("stop protection" in Microsoft talk) by using the password "**wfg.**" We are happy to grant this permission, however, we do so with one caveat: If you modify the form in any material manner that removes key tasks, you may not be eligible for any participation or certification programs we may offer our agents in the future.

The Developer Tab
To work inside a Microsoft Fillable Form, users will need access to the Developer Tab in Microsoft Word. If you do not see the Developer Tab across the top of your Microsoft Word screen (shown below), follow the directions here to add it.
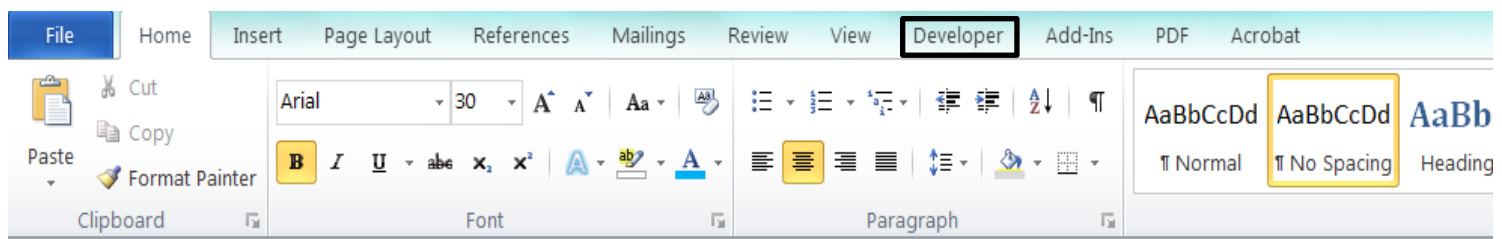
Legacy Tools and Restrict Editing

Using fillable forms and locking or unlocking documents will require you to become familiar with the "Legacy Tools" and "Restrict Editing" buttons (shown below) in Microsoft Word. You can learn about using these tools here.
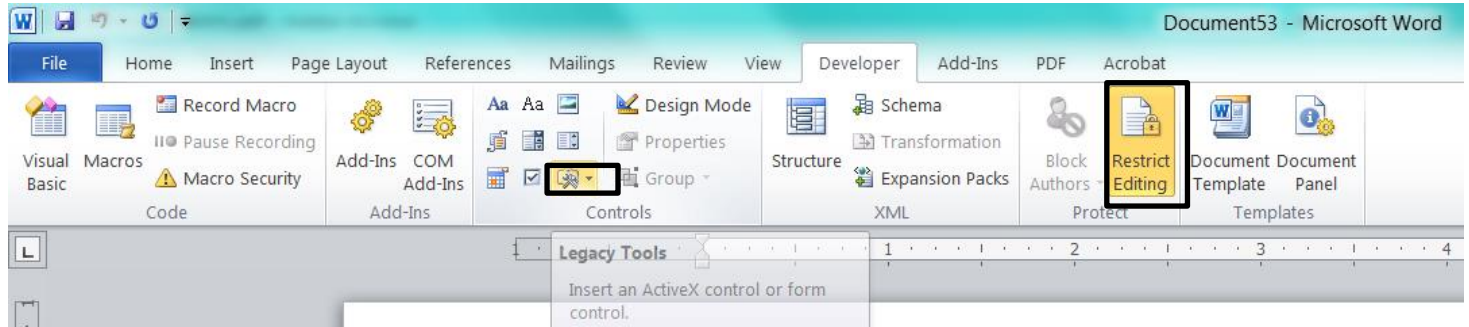
Tips

- If you do not plan to enter information into a given field, you must remove the trigger language or the entire field by pressing the delete key or spacebar, so the trigger language does not appear in your printed document.
- The gray highlight only appears on screen as a helpful tool; when you print a completed template, the gray will not show.
- Users should verify their spelling inside a form field. Spell check will not identify a spelling error inside a form field as it would inside plain text.
- Users should double check font type and size to ensure consistent formatting throughout a document. Use of form fields can sometimes alter these functions.
- Users should make sure their logo and contact information on the left side of the form maintain their position on the page. The form can be unlocked to manage its appearance and to address any other document formatting issues.

How do I overbrand my Compliance Package? On the first page of every template document, in the left margin, you will find a space where you can add your company logo and company contact information. Typing the contact information is easy; you do this the same way you complete a form. Adding the logo can be trickier. Users will find a blue box, like the one pictured on the right. Clicking in the center of this box will take you to a screen from which you can browse the files on your computer. You should locate the graphic file (logo) you want to use in the document, click on "insert," and your template has been branded.

CMS LIBRARY
May 2014

POLICY TEMPLATE CHECKLIST
— Anti-Fraud Policy
— Clean Desk and Clear Screen Policy
— Company Policy Review Policy
— Confidential Information and Records Policy
— Confidentiality Disclosure & Electronic Communications Plcy
— Consumer Complaint Policy
— Disaster Recovery Plan Policy
— Escheatment Policy
— Escrow Trust Accounting Policy
— File Compliance Audit Policy
— File Management Policy
— File Retention and Destruction Policy
— Incident Response Policy
— Information Sensitivity Policy
— Information Technology Asset Management Policy
— Information Technology Policy
— Insurance Policy
— Licensing Policy
— Media Policy
— Notary Policy
— Overseeing Service Providers Policy
— Pandemic Response Policy
— Privacy Policy
— Risk Management Policy
— Security Awareness Policy
— Title Insurance Policy Production and Remittance Policy
— Training Policy
— Visitor Access Policy
— Whistleblower Policy
— Whistleblower Protection Policy
— Wireless Communication Policy

ADDITIONAL DOCUMENTATION CHECKLIST
— Asset Management Log
— Company Insurance Binder
— Consumer Complaint Form
— Consumer Complaint Log
— Disaster Recovery Addendum A – Employee Contact List
— Disaster Recovery Addendum B – Client Contact List
— Disaster Recovery Addendum C – Vendor Contact List
— Disaster Recovery Addendum D – Critical Business Functions
— Disaster Recovery Addendum E – Command Center Map and Directions
— Disaster Recovery Addendum F – Temporary Workspace Map and Directions
— Disaster Recovery Addendum G – Backup Procedures
— Disaster Recovery Addendum H – Testing Records
— Employee Authorizations List
— Escrow/Trust Account List
— File Audit Log
— Incident Tracking Log
— License Binder – Company Log
— License Binder – Employee Log
— Notary Journal
— Policy Update Acknowledgement Form
— Record Destruction Log
— Risk Notification Log
— Signature Stamp List
— Training Log
— Vendor License and Insurance Binder
— Visitor Access Log

PACKAGING DOCUMENTS CHECKLIST
— Cover Page
— Introduction
— Table of Contents
— Agency Overview
— Office Locations
— Staff Biographies
— Organizational Chart