



NAPPS CONFERENCE 2017

Saturday, May 20, 2017 – 9:00 am to 10:00 am

**Applying for the NAPPS FSC Designation:
A Step-by-Step Guide to the Application Process**

The NAPPS FSC Accreditation Program Course Overview

- Why did NAPPS create the FSC Program
- Who should apply
- Benefits of Accreditation
- Program Qualifications
- Program Deliverables
- How to Create a Working Policy
- Presentation of Icon
- Keeping your Accreditation Status
- Summary with Q & A Session

WHY DID CREATE THE FSC ACCREDITATION PROGRAM

In response to current and ongoing Consumer Financial Protection Bureau (CFPB) policies and procedures being mandated and enforced upon Financial Institutions across the U.S.; the National Association of Professional Process Servers (NAPPS) have created the NAPPS FSC Accreditation Program with the intent to pre-qualify Individuals who work directly or indirectly with the Financial Service Sector. This Voluntary accreditation program is available to NAPPS Members in good standing; whereupon successful validation of a completed Questionnaire, an icon will appear alongside of their e-listing, indicating they have met the qualifications known to exist through the CFPB, and guarantee corresponding policies and procedures are in place. Potential clients will be directed to the NAPPS website as tool in finding a vendor system, currently practicing a workflow required by the CFPB.

WHO SHOULD APPLY

- Members currently handling files in the Financial Services space
- Members looking to diversify their client base
- Members wishing to increase workflow consistency
- Members desiring to supplement their marketing approach
- Members required to have a working compliance program in place
- Others?

BENEFITS OF ACCREDITATION

- Proof of Financial Services Compliancy
- Keeping Current Clients and Business
- Attracting New Clients
- Market Diversity
- Increased Market Appeal
- Written Workflow and Policy
- Improved Overall Business Health
- Other Benefits?



PROGRAM QUALIFICATIONS

GENERAL ORGANIZATION OUTLINE

1. Name of Member/Participant:
2. Email: _____ Phone: _____
3. Does the Participant own, or is employed by or otherwise controlled by a parent company or other?
4. If yes, provide the company/entity name and address:
5. Provide the Company's type of legal entity and state of incorporation, if incorporated:
(Provide Proof of Incorporation if applicable)
6. Provide the number of years the Participant has been in the Profession as a Private Process Server:
7. Identify the Participant's office location(s) and main office physical address:
8. Identify the Participant's web address:
9. Provide a description of the services provided by the Participant:

BUSINESS INSURANCE, ORGANIZATIONAL STRUCTURE AND HISTORY

1. Identify any relevant business licenses maintained by the Participant:
(Provide Licensing Documents)
2. Does the Participant have insurance coverage, with limits not less than: General and Professional Liability (E&O) Each Occurrence: \$1,000,000; Damages to Rented Premises: \$100,000; with a General Aggregate of \$1,000,000.
(Provide Certificate of Liability Insurance)
3. Has the Participant had any Judgments against Company or Affiliates, rendered regarding services related to **Bankruptcy, Foreclosure, Collections, and or the Sale and Marketing of Real Estate** within the last 10 years. If none, indicate below:
4. If yes, provide a brief description of the Judgments and/or Material Lawsuits.
5. Has the Participant been subject to an investigation by a governmental entity within the last 12 months?
6. Does the Participant have a Code of Conduct that its employees must follow?
(Provide a copy of the Code of Conduct)

PROTECTING PII WITHIN THE ORGANIZATION (Personal Identifiable Information)

1. Do you use a Case Management Software System (AMS) with encryption?
2. Do you have levels of security for various access points?
3. What controls have been put in place to ensure that PII is handled, retained and disposed of appropriately?
4. Do you have a document shredder?
5. Do you maintain a secure entrance? Describe how the entrance and access to your facility is managed:
6. Do you have a sign in process for visitors?
7. Do you have service level agreements or contracts with clients? If yes, provide example.

BUSINESS CONTINUITY PLAN

1. Do you have a contingency plan in place for your organization? If yes, provide details.
2. If yes, how often is the plan updated and tested?
(Provide copy of CP)
3. Do you have an alternate location to work from should your workplace become unavailable?
4. Do you have an alternate secure location to store confidential client data such as filings and or checks?
5. If yes, please list location and briefly describe how the location is secure:
6. What is the Participant's expected recovery time from a significant outage?
7. How are system backups performed and stored?

VENDOR MANAGEMENT

1. Are the Participant's Employees and/or Contractors bound by Confidentiality Agreements?
(Provide a copy of the Agreement)
(Provide a copy of Subcontractor Agreement if Contractors are used)
2. Do you provide written confirmation of vendor fee schedules?
3. Briefly describe the onboard process for new vendors/contractors:
4. Describe how the Participant qualifies its Subcontractors:
5. Do you have a Vendor Management Policy?
(Provide copy of VMP)

INFORMATION SECURITY

1. Does the Participant have a formal Information Security Program?
(Provide a copy of the Information Security Program Guide and Information Security Policy)
2. How often are the Participant's information security policies, standards and procedures reviewed/updated?
3. Does the Participant have a policy regarding access to its computer-based information systems or applications?
(Provide a copy of the User Access Policy)
4. Does the Participant have a policy regarding remote access to its network?
(Provide a copy of the Remote Access Policy)
5. Do Third-Parties have access to the Participant's computer-based information systems or applications?
6. If yes, how is Third-Party access controlled and/or monitored?
(Provide a copy of the Third Party Network Access Policy)
7. Does the Participant have a policy that governs mobile media devices?
(Provide a copy of the Mobile Media Policy)
8. Does the Service Provider require password protection for its case management systems, applications and Client information?

1. If yes, briefly describe the Service Provider's password policy.
(Provide a copy of the Password Policy)
2. How does the Participant remove data from its systems?
3. Does the Participant have firewall protections?
4. Does the Participant have anti-virus protection on its systems?
5. Does the Participant have wireless regulations?
6. If yes, how often are these regulations reviewed/updated?
7. Does the Service Provider utilize a Third-Party data center?
8. If yes, please identify the Participant's current provider and location of the Third-Party data center:



PROGRAM DELIVERABLES

REQUIRED DELIVERABLES

- Proof of Incorporation (if applicable)
- All Required State and Federal Licensing Documents
- Certificate(s) of Insurance
- Code of Conduct
- Business Continuity Plan
- Employee Agreement (Confidentiality) or Handbook
- Subcontractor Agreement
- Vendor Management Policy
- Information Security Program Guide (to include)
- Information Security Policy
- User Access Policy
- Remote Access Policy
- Third Party Network Access Policy
- Mobile Media Policy
- Password Policy



POLICY
CREATION

HOW TO CREATE A WORKING POLICY

- Break down the policy into three separate parts
 - The Policy Document (the why – purpose)
 - The Standards Document (the what – overriding goal)
 - The Procedures Document (the how – steps to achieve)

The policy document describes why a policy is required in the first place and sets the tone for the other two documents

The standards document answers the question of the what or overriding goal; and

The procedures document provides a step-by-step breakdown of how the policy will be carried out

<http://hosteddocs.ittoolbox.com/MU041604.pdf>

PRESENTATION OF ICON

Once the FSC Committee has deemed the Members qualifications and deliverables to be accepted, an icon will be placed next to the members e-listing at www.napps.org alerting users that the particular member, **and the Agency that it represents**, have achieved accreditation status and are known to have qualifying standards and workflows in place. Thus, allowing users (Lenders, Collection Law Firms, Collection Agencies, Process Service Agencies, etc.) to forego the onboarding step of vetting for CFPB requirements.

The ultimate goal for this program is to provide a vehicle for those members of NAPPS that wish to work in the FS space, the ability to do so, despite the need for a compliance program. Consider it the 'Robinhood Effect' by shifting work from non-member Agencies to NAPPS Member Agencies wishing to increase market potential through this niche.

KEEPING YOUR ACCREDITATION STATUS

The NAPPS FSC Committee will conduct annual audits of those individuals currently possessing the FSC Accreditation, to ensure continued compliance with its outline, all procedural requirements, consumer protection laws, and with regard to data and physical security. Site visits will be performed with notice of no less than five (5) business days. In the event the result of any audit or review process identifies deficiencies, the Member will fully cooperate with the Committee to develop and implement an appropriate written action and follow-up plan or risk losing said Accreditation and corresponding badge attached to their e-Directory listing.

IN SUMMARY

Whether you have been touched by the CFPB or not, the current reality is that many of us have. This program provides a vehicle for those interested in working with Financial Service clients, the baseline ability to do so. Individual client/vendor requirements will undoubtedly vary, but in qualifying for the NAPPS FSC Accreditation, you can be confident that your foundation for your compliance program has been constructed.

Secondary, the program opens a welcomed path to relationships with multiple associations with members that would be considered users. Ongoing relations and the branding of NAPPS with these groups is an essential element when looking at the FSC Program as a whole.

IF YOU ARE NOT ASLEEP AND
CAN READ THIS – HOOT, HOLLER
AND SCREAM!!

CAUSE WE BE DONE

Q & A SESSION