Industry-Specific FTC Safeguards Rule Compliance Checklists

Tailored Compliance Solutions for Financial Services Sectors

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PAGE 1: TAX INDUSTRY REGULATORY FRAMEWORK

🎯 INDUSTRY-SPECIFIC RISK PROFILE

Primary Data Types at Risk

- ☐ **Social Security Numbers** *(Highest target for identity theft)*
- ☐ **Individual Taxpayer Identification Numbers (ITINs)**
- ☐ **Bank account and routing numbers** *(Direct deposit information)*
- ☐ **Employer Identification Numbers (EINs)** *(Business client data)*
- ☐ **Prior year tax returns** *(Historical financial data)*
- ☐ **Supporting tax documents** *(W-2s, 1099s, receipts)*
- ☐ **Family member information** *(Dependents, spouses)*

Attack Vectors Specific to Tax Industry

- ☐ **Phishing emails targeting tax software access**
- ☐ **Ransomware during tax season** *(Peak vulnerability period)*
- ☐ **Social engineering of seasonal staff** *(Less security training)*
- ☐ **Theft of physical documents** *(Client drop-offs)*
- ☐ **E-filing system compromise** *(Direct access to IRS systems)*
- ☐ **Client portal infiltration** *(Unauthorized access to multiple returns)*

📋 INTEGRATED REGULATORY REQUIREMENTS

FTC Safeguards Rule + IRS Publication 4557

- ☐ **Written Information Security Plan (WISP) developed**
- ☐ **IRS security recommendations integrated into WISP**
- ☐ **Data safeguard procedures documented** *(IRS Section 7216 compliance)*
- ☐ **Client consent procedures established** *(Disclosure and use authorization)*
- ☐ **Preparer Tax Identification Number (PTIN) holder obligations met**

IRS Security Standards Integration

- ☐ **IRS Taxpayer First Act requirements addressed**
- ☐ **Due diligence procedures for Economic Impact Payments**
- ☐ **Identity theft prevention protocols established**
- ☐ **Suspicious activity reporting procedures** *(IRS reporting requirements)*

State-Level Requirements

- ☐ **State tax authority security requirements reviewed**
- ☐ **State data breach notification laws compliance verified**
- ☐ **Professional licensing board requirements met**
- ☐ **State-specific client confidentiality rules integrated**

🔒 TAX-SPECIFIC ACCESS CONTROLS

Software & System Access Management

☐ **Tax preparation software access controls** *(User-specific logins)*

☐ **E-filing system security verified** *(IRS-approved software only)*

☐ **Client portal access management** *(Individual client access)*

☐ **Document management system controls** *(Role-based access)*

☐ **Third-party integrations secured** *(Bank products, bookkeeping)*

Physical Document Security

☐ **Client document intake procedures** *(Secure drop-off/pickup)*

☐ **Paper return storage security** *(Locked filing systems)*

☐ **Document destruction procedures** *(Shredding requirements)*

☐ **Mail handling security protocols** *(Incoming tax documents)*

☐ **Mobile device controls for field work** *(Client visits)*

👥 SEASONAL STAFF SECURITY PROTOCOLS

Temporary Employee Management

☐ **Background check procedures for seasonal staff**

☐ **Security training program for temporary workers**

☐ **Limited access controls during probationary period**

☐ **Supervision requirements for new staff**

☐ **Account termination procedures post-season**

Training & Competency Requirements

☐ **Tax industry security awareness training**

☐ **IRS identity theft prevention training**

☐ **Client confidentiality training** *(Section 7216 requirements)*

☐ **Phishing recognition specific to tax season**

☐ **Incident reporting procedures training**

PAGE 2: TAX PREPARATION TECHNICAL SAFEGUARDS

💻 E-FILING SYSTEM SECURITY

IRS Modernized E-File (MeF) Security

☐ **Authorized IRS e-file provider status verified**

☐ **Electronic Return Originator (ERO) security standards met**

☐ **Practitioner Personal Identification Number (PIN) security**

☐ **Self-Select PIN security procedures** *(Client PIN protection)*

☐ **Acknowledgment file security** *(IRS processing confirmations)*

Tax Software Security Requirements

- [ ] **IRS-approved software verification** *(Only certified products)*
- [ ] **Software vendor security assessments** *(Due diligence on providers)*
- [ ] **Regular software updates and patches** *(Security vulnerability management)*
- [ ] **Data backup procedures for tax software**
- [ ] **Software licensing compliance** *(Prevent unauthorized copies)*

Database & File Management

- [ ] **Client tax return database encryption**
- [ ] **Supporting document scanning security** *(Image file protection)*
- [ ] **File naming conventions for security** *(No SSN in filenames)*
- [ ] **Archive storage security** *(Long-term retention protection)*
- [ ] **Data migration security** *(Software changes/upgrades)*

🔒 CLIENT COMMUNICATION SECURITY

Secure Client Portals

- [ ] **Multi-factor authentication for client access**
- [ ] **Document upload encryption** *(Client-provided documents)*
- [ ] **Download security controls** *(Completed returns)*
- [ ] **Session timeout procedures** *(Automatic logout)*
- [ ] **Client notification security** *(Return completion alerts)*

Email & Digital Communication

- [ ] **Encrypted email for tax documents** *(Never send SSN unencrypted)*
- [ ] **Secure file transfer protocols** *(Large document sharing)*
- [ ] **Client identity verification procedures** *(Before sharing information)*
- [ ] **Digital signature security** *(E-signature authenticity)*
- [ ] **Communication audit trails** *(Record keeping requirements)*

📊 TAX SEASON INCIDENT RESPONSE

Peak Season Security Monitoring

- [ ] **Enhanced monitoring during tax season** *(January 15 - April 15)*
- [ ] **Increased backup frequency** *(Daily during peak)*
- [ ] **Extended operating hours security coverage**
- [ ] **Rapid response team for tax season incidents**
- [ ] **IRS notification procedures for e-file compromises**

Identity Theft Response Protocol

- [ ] **Client identity theft notification procedures**
- [ ] **IRS Identity Protection PIN (IP PIN) coordination**
- [ ] **Form 14039 filing assistance** *(Identity Theft Affidavit)*
- [ ] **Tax return flagging procedures** *(Prevent fraudulent filing)*
- [ ] **Client support during identity theft resolution**

🏢 MULTI-LOCATION & FRANCHISE SECURITY

Standardized Security Across Locations

- ☐ **Centralized security policy implementation**
- ☐ **Location-specific risk assessments**
- ☐ **Standardized staff training programs**
- ☐ **Centralized incident reporting system**
- ☐ **Franchise security compliance monitoring**

Remote Work & Home Office Security

- ☐ **Home office security standards** *(Virtual tax preparation)*
- ☐ **VPN access controls for remote preparers**
- ☐ **Client document handling in home offices**
- ☐ **Secure disposal procedures for remote workers**
- ☐ **Equipment security for mobile preparers**

PAGE 3: TAX PREPARATION ONGOING COMPLIANCE

📅 ANNUAL COMPLIANCE CYCLE

Pre-Season Preparation (October - December)

- ☐ **Security system updates and testing**
- ☐ **Staff security training refresh** *(Before tax season)*
- ☐ **Software security verification** *(New version testing)*
- ☐ **Client portal security testing**
- ☐ **Backup and recovery system testing**

Tax Season Operations (January - April)

- ☐ **Daily security monitoring and reporting**
- ☐ **Weekly access control reviews**
- ☐ **Incident response team availability** *(24/7 during peak)*
- ☐ **Client security awareness communications**
- ☐ **Vendor security monitoring** *(Third-party services)*

Post-Season Activities (May - September)

- ☐ **Comprehensive security assessment**
- ☐ **Staff access removal for seasonal employees**
- ☐ **Client data archival security procedures**
- ☐ **Lessons learned documentation**
- ☐ **Planning for next tax season security improvements**

🔍 IRS EXAMINATION READINESS

Documentation Requirements

- ☐ **Current WISP available for IRS review**
- ☐ **Staff training records maintained** *(Compliance demonstration)*
- ☐ **Incident response documentation**
- ☐ **Client data protection evidence**
- ☐ **Third-party vendor agreements** *(Security provisions)*

Audit Response Procedures

- ☐ **IRS examiner communication protocols**
- ☐ **Document production security procedures**
- ☐ **Client notification requirements during audit**
- ☐ **Legal counsel coordination procedures**
- ☐ **Remediation planning for identified gaps**

💰 CLIENT FINANCIAL DATA PROTECTION

Bank Account & Payment Security

- ☐ **Direct deposit information encryption**
- ☐ **Refund advance product security** *(Third-party lending)*
- ☐ **Payment processing compliance** *(Credit card, ACH)*
- ☐ **Fee calculation system security**
- ☐ **Financial product recommendation security** *(Prepaid cards, etc.)*

Prior Year Data Management

- ☐ **Multi-year client history protection**
- ☐ **Retention schedule compliance** *(IRS and state requirements)*
- ☐ **Secure disposal of expired records**
- ☐ **Client access to historical data** *(Secure retrieval)*
- ☐ **Audit trail maintenance for data access**

📈 BUSINESS CONTINUITY FOR TAX SEASON

Disaster Recovery Planning

- ☐ **Tax season-specific recovery priorities**
- ☐ **Alternative preparation site procedures**
- ☐ **Client communication during outages**
- ☐ **IRS deadline extension coordination**
- ☐ **Staff redeployment procedures**

Technology Failure Response

- ☐ **Software failure backup procedures**
- ☐ **Internet outage contingency plans**
- ☐ **Power failure backup systems**
- ☐ **Hardware replacement procedures**
- ☐ **Data recovery testing and verification**

PAGE 4: MORTGAGE INDUSTRY REGULATORY FRAMEWORK

🏠 INDUSTRY-SPECIFIC RISK PROFILE

Primary Data Types at Risk

- ☐ **Social Security Numbers and Tax IDs** *(Borrower identification)*
- ☐ **Bank statements and financial records** *(Income verification)*
- ☐ **Credit reports and scores** *(Underwriting data)*
- ☐ **Employment and income verification** *(VOE/VOI documents)*
- ☐ **Property appraisals and valuations** *(Collateral information)*
- ☐ **Loan application data** *(Uniform Residential Loan Application)*
- ☐ **Title and closing documents** *(Property ownership records)*
- ☐ **Insurance information** *(Property and mortgage insurance)*

Mortgage-Specific Threat Vectors

- ☐ **Wire fraud targeting closing transactions** *(Email compromise)*
- ☐ **Loan application fraud** *(Synthetic identity theft)*
- ☐ **Appraisal manipulation** *(Property value fraud)*
- ☐ **Closing table fraud** *(Document forgery)*
- ☐ **Loan officer credential theft** *(NMLS system access)*
- ☐ **Borrower impersonation** *(Identity takeover)*

📋 INTEGRATED REGULATORY REQUIREMENTS

FTC Safeguards Rule + CFPB Requirements

- ☐ **Consumer Financial Protection Bureau (CFPB) examination readiness**
- ☐ **Fair Credit Reporting Act (FCRA) compliance integration**
- ☐ **Equal Credit Opportunity Act (ECOA) data protection**
- ☐ **Truth in Lending Act (TILA) disclosure security**
- ☐ **Real Estate Settlement Procedures Act (RESPA) compliance**

Government-Sponsored Enterprise (GSE) Requirements

- ☐ **Fannie Mae cybersecurity requirements** *(Selling Guide compliance)*
- ☐ **Freddie Mac security standards** *(Seller/Servicer Guide)*
- ☐ **Ginnie Mae cybersecurity protocols** *(For FHA/VA loans)*
- ☐ **FHA cybersecurity requirements** *(HUD standards)*
- ☐ **VA loan security protocols** *(Department of Veterans Affairs)*

TRID Rule Security Integration

- ☐ **TILA-RESPA Integrated Disclosure (TRID) data protection**

- ☐ **Closing Disclosure security protocols**
- ☐ **Loan Estimate protection procedures**
- ☐ **Three-day review period security** *(Document delivery confirmation)*
- ☐ **TRID timing compliance documentation**

State & Local Requirements

- ☐ **State mortgage licensing requirements** *(NMLS compliance)*
- ☐ **State data breach notification laws**
- ☐ **Local recording office security** *(Document filing protection)*
- ☐ **State fair lending law compliance**

🔐 MORTGAGE-SPECIFIC ACCESS CONTROLS

Loan Origination System (LOS) Security

- ☐ **LOS user access controls** *(Role-based permissions)*
- ☐ **Application data encryption** *(In transit and at rest)*
- ☐ **Document imaging security** *(Scanned document protection)*
- ☐ **Loan pipeline protection** *(Work-in-progress security)*
- ☐ **Integration security** *(Third-party system connections)*

NMLS System Security

- ☐ **Nationwide Multistate Licensing System access controls**
- ☐ **Loan officer licensing verification** *(Active license confirmation)*
- ☐ **Continuing education compliance tracking**
- ☐ **NMLS reporting security** *(Call report protection)*
- ☐ **State licensing system integration security**

👥 LOAN OFFICER & STAFF PROTOCOLS

Licensed Professional Management

- ☐ **NMLS identification verification** *(Valid license confirmation)*
- ☐ **Continuing education tracking** *(CE requirement compliance)*
- ☐ **Disciplinary action monitoring** *(NMLS Consumer Access checks)*
- ☐ **Loan officer access controls** *(System permissions by license)*
- ☐ **Commission and compensation system security**

Third-Party Originator (TPO) Management

- ☐ **Broker security requirements** *(TPO agreement provisions)*
- ☐ **Correspondent lender security standards**
- ☐ **Due diligence on mortgage brokers**
- ☐ **TPO system access controls** *(Limited access permissions)*
- ☐ **TPO incident reporting requirements**

PAGE 5: MORTGAGE TECHNICAL SAFEGUARDS

💻 LOAN PROCESSING SYSTEM SECURITY

Automated Underwriting System (AUS) Protection

☐ **Desktop Underwriter (DU) access security** *(Fannie Mae system)*

☐ **Loan Prospector (LP) security protocols** *(Freddie Mac system)*

☐ **GUS security procedures** *(Ginnie Mae system)*

☐ **AUS data transmission encryption**

☐ **Findings report protection** *(Underwriting results security)*

Credit Reporting & Verification Systems

☐ **Credit report access controls** *(Permissible purpose verification)*

☐ **Tri-merge credit report security** *(Multiple bureau reports)*

☐ **Credit monitoring system security** *(Ongoing credit checks)*

☐ **Income verification system security** *(VOE/VOI platforms)*

☐ **Asset verification platform security** *(Bank statement analysis)*

Appraisal Management System Security

☐ **Appraisal ordering system protection**

☐ **Appraiser access controls** *(Licensed professional verification)*

☐ **Appraisal report encryption** *(Document protection)*

☐ **Quality control review security** *(Internal appraisal review)*

☐ **Appraisal Independence Requirements (AIR) compliance**

🔒 CLOSING & SETTLEMENT SECURITY

Closing Disclosure Protection

☐ **CD preparation system security** *(TRID compliance)*

☐ **Digital delivery security** *(Electronic CD transmission)*

☐ **Three-day waiting period verification** *(Timing compliance)*

☐ **CD revision security procedures** *(Change management)*

☐ **Borrower acknowledgment tracking** *(Receipt confirmation)*

Wire Transfer & Funds Security

☐ **Wire fraud prevention protocols** *(Multi-factor verification)*

☐ **Closing cost verification procedures**

☐ **Escrow account security** *(Trust account protection)*

☐ **Title company communication security**

☐ **Settlement agent verification procedures**

📊 FAIR LENDING & COMPLIANCE MONITORING

Fair Lending Data Protection

☐ **HMDA data security** *(Home Mortgage Disclosure Act)*

☐ **CRA data protection** *(Community Reinvestment Act)*

☐ **Fair lending testing data security** *(Compliance monitoring)*

☐ **Redlining prevention monitoring**

☐ **Disparate impact analysis security**

Quality Control & Audit Security

☐ **Post-closing QC data protection**

☐ **Loan file audit security procedures**

☐ **Repurchase request handling** *(Investor quality control)*

☐ **Early payment default monitoring**

☐ **Compliance audit trail maintenance**

🏢 MULTI-CHANNEL ORIGINATION SECURITY

Retail Channel Security

☐ **Branch office security standards**

☐ **Loan officer mobile device security**

☐ **Customer meeting room security** *(Privacy protection)*

☐ **Document collection procedures**

☐ **In-person application security**

Digital Channel Security

☐ **Online application platform security**

☐ **Mobile app security protocols**

☐ **Digital document upload security**

☐ **E-signature platform integration**

☐ **Customer portal access controls**

PAGE 6: MORTGAGE ONGOING COMPLIANCE

📅 MORTGAGE COMPLIANCE CYCLE

Monthly Compliance Activities

☐ **NMLS license status verification** *(Active license checks)*

☐ **Loan officer continuing education tracking**

☐ **Third-party vendor security reviews**

☐ **Quality control testing and documentation**

☐ **Fair lending monitoring and reporting**

Quarterly Compliance Reviews

☐ **Comprehensive risk assessment updates**

☐ **CFPB examination readiness review**

☐ **GSE security requirement updates** *(Fannie Mae/Freddie Mac)*

☐ **State regulatory requirement changes**

☐ **Incident response plan testing**

Annual Compliance Requirements

☐ **HMDA data submission security** *(Annual reporting)*

☐ **CRA data compilation security**

☐ **Mortgage call report preparation** *(Regulatory reporting)*

☐ **Compliance management system review**

☐ **Third-party risk management assessment**

🔍 REGULATORY EXAMINATION READINESS

CFPB Examination Preparation

☐ **Consumer complaint handling documentation**

☐ **Fair lending compliance evidence**

☐ **TRID compliance documentation**

☐ **Quality control system documentation**

☐ **Third-party vendor management records**

State Regulator Examination Readiness

☐ **NMLS examination preparation**

☐ **State-specific compliance documentation**

☐ **Loan officer supervision records**

☐ **Branch office compliance records**

☐ **Consumer protection compliance evidence**

💰 INVESTOR & WAREHOUSE SECURITY

Warehouse Lender Security Requirements

☐ **Warehouse line security provisions**

☐ **Loan delivery security protocols**

☐ **Collateral tracking system security**

☐ **Funding request security procedures**

☐ **Warehouse lender reporting security**

Secondary Market Security

☐ **Loan sale security procedures**

☐ **Investor delivery requirements**

☐ **Loan package preparation security**

☐ **Purchase advice security protocols**

☐ **Investor reporting system security**

📈 BUSINESS CONTINUITY & DISASTER RECOVERY

Mortgage-Specific Continuity Planning

☐ **Loan pipeline protection procedures**

- ☐ **Closing delay mitigation procedures**
- ☐ **Rate lock extension protocols**
- ☐ **Alternative funding source procedures**
- ☐ **Investor notification procedures**

Technology Failure Response

- ☐ **LOS system failure procedures**
- ☐ **AUS system outage protocols**
- ☐ **Credit reporting system backup procedures**
- ☐ **Communication system redundancy**
- ☐ **Document management system recovery**

INVESTMENT ADVISORY SERVICES

Pages 7-9: SEC & Fiduciary Duty Compliance

PAGE 7: INVESTMENT ADVISORY REGULATORY FRAMEWORK

💼 INDUSTRY-SPECIFIC RISK PROFILE

Primary Data Types at Risk

- ☐ **Client financial portfolios** *(Investment holdings and values)*
- ☐ **Social Security Numbers and Tax IDs** *(Client identification)*
- ☐ **Bank account and brokerage information** *(Asset custody data)*
- ☐ **Financial planning documents** *(Retirement and estate plans)*
- ☐ **Investment advisor representative credentials** *(Series licenses)*
- ☐ **Client meeting notes and communications** *(Advisory relationship records)*
- ☐ **Trade execution records** *(Transaction history)*
- ☐ **Fee billing and payment information** *(Advisory fee data)*

Investment Advisory Threat Vectors

- ☐ **Client impersonation for unauthorized trades**
- ☐ **Portfolio data theft for insider trading**
- ☐ **Advisor credential theft** *(Series license fraud)*
- ☐ **Client portal compromise** *(Account takeover)*
- ☐ **Wire fraud targeting client funds**
- ☐ **Synthetic identity theft for new accounts**
- ☐ **Insider trading information theft**
- ☐ **Fee fraud and billing manipulation**

📋 INTEGRATED REGULATORY REQUIREMENTS

FTC Safeguards Rule + SEC Requirements

- ☐ **Securities and Exchange Commission (SEC) examination readiness**

- [ ] **Investment Advisers Act of 1940 compliance**
- [ ] **Form ADV cybersecurity disclosure requirements**
- [ ] **Fiduciary duty data protection obligations**
- [ ] **Investment Company Act compliance** *(For fund advisors)*

SEC Cybersecurity Requirements

- [ ] **Form ADV Part 2A cybersecurity disclosure** *(Annual update)*
- [ ] **Regulation S-P privacy requirements** *(Safeguards and privacy notices)*
- [ ] **Books and records security** *(Rule 204-2 compliance)*
- [ ] **Custody rule security provisions** *(Rule 206(4)-2)*
- [ ] **Advertising rule compliance** *(Investment Adviser Marketing Rule)*

FINRA Coordination (for dual registrants)

- [ ] **FINRA cybersecurity requirements** *(If broker-dealer affiliated)*
- [ ] **Customer Identification Program (CIP) security**
- [ ] **Anti-Money Laundering (AML) program security**
- [ ] **Suspicious Activity Report (SAR) filing security**
- [ ] **FINRA examination coordination procedures**

State Investment Advisor Requirements

- [ ] **State registration cybersecurity requirements**
- [ ] **State examination readiness** *(For state-registered advisors)*
- [ ] **State notice filing security procedures**
- [ ] **State-specific client protection requirements**

🔐 INVESTMENT ADVISORY ACCESS CONTROLS

Portfolio Management System Security

- [ ] **Portfolio management software access controls**
- [ ] **Client account segregation** *(Advisor-level access controls)*
- [ ] **Trade order management security** *(Authorized trading only)*
- [ ] **Performance reporting system security**
- [ ] **Rebalancing system security protocols**

Client Relationship Management (CRM) Security

- [ ] **Client contact information protection**
- [ ] **Meeting notes and communication security**
- [ ] **Client documentation system security**
- [ ] **Compliance tracking system security** *(Suitability documentation)*
- [ ] **Client onboarding process security**

👥 INVESTMENT ADVISOR REPRESENTATIVE PROTOCOLS

Licensed Professional Management

- ☐ **Series license verification** *(Series 65, 66, 7, etc.)*
- ☐ **Continuing education compliance tracking**
- ☐ **Background check and Form U4 security**
- ☐ **Outside business activity monitoring**
- ☐ **Personal trading compliance** *(Code of ethics enforcement)*

Supervised Person Management

- ☐ **Supervision system security** *(Chief Compliance Officer oversight)*
- ☐ **Training program security** *(Compliance education)*
- ☐ **Personal securities transaction reporting**
- ☐ **Gifts and entertainment reporting security**
- ☐ **Whistleblower protection procedures**

PAGE 8: INVESTMENT ADVISORY TECHNICAL SAFEGUARDS

💻 CLIENT PORTAL & DIGITAL PLATFORM SECURITY

Client Portal Security Features

- ☐ **Multi-factor authentication for client access**
- ☐ **Account aggregation security** *(Linking external accounts)*
- ☐ **Document vault security** *(Client document storage)*
- ☐ **Secure messaging platform** *(Encrypted client communications)*
- ☐ **Mobile app security protocols** *(iOS/Android applications)*

Digital Asset Management Security

- ☐ **Robo-advisor platform security** *(Automated investment platforms)*
- ☐ **Algorithm security and testing** *(Investment algorithm protection)*
- ☐ **API security for data feeds** *(Market data and account information)*
- ☐ **Third-party integration security** *(Financial planning software)*
- ☐ **Digital signature platform security** *(Electronic document signing)*

Market Data & Research Security

- ☐ **Market data feed security** *(Bloomberg, Reuters, etc.)*
- ☐ **Research platform access controls**
- ☐ **Investment research distribution security**
- ☐ **Third-party research vendor security**
- ☐ **Proprietary research protection** *(Intellectual property security)*

🔒 FIDUCIARY DUTY & CLIENT PROTECTION

Suitability & Best Interest Protection

- ☐ **Client risk profile security** *(Know Your Customer data)*
- ☐ **Suitability analysis documentation security**
- ☐ **Best interest documentation** *(Regulation Best Interest compliance)*
- ☐ **Investment policy statement security**

☐ **Client objective tracking security**

Fee Transparency & Billing Security

☐ **Fee calculation system security** *(Management and performance fees)*

☐ **Fee disclosure documentation security**

☐ **Billing system integration security**

☐ **Payment processing security** *(ACH and wire transfers)*

☐ **Fee rebate and soft dollar security** *(Compliance tracking)*

📊 TRADE EXECUTION & CUSTODY SECURITY

Trade Order Management Security

☐ **Order entry system security** *(Authorized trading controls)*

☐ **Best execution documentation security**

☐ **Trade allocation security** *(Fair allocation among clients)*

☐ **Principal trading disclosure security**

☐ **Cross trading security procedures**

Custody & Asset Protection

☐ **Qualified custodian security verification**

☐ **Client asset segregation procedures**

☐ **Custody agreement security provisions**

☐ **Account statement verification procedures**

☐ **Surprise examination compliance** *(For custody arrangements)*

🏢 MULTI-OFFICE & BRANCH SECURITY

Branch Office Security Standards

☐ **Branch office registration security**

☐ **Supervision system for remote offices**

☐ **Communication system security between offices**

☐ **Document retention across multiple locations**

☐ **Shared technology platform security**

Remote Advisory Services Security

☐ **Virtual meeting platform security** *(Client video conferences)*

☐ **Remote document review procedures**

☐ **Home office security standards for advisors**

☐ **Mobile device management for field work**

☐ **Secure client communication from remote locations**

📅 ADVISORY COMPLIANCE CYCLE

Monthly Compliance Activities

☐ **Personal trading review and approval**

☐ **Client complaint tracking and resolution**

☐ **Outside business activity monitoring**

☐ **Marketing material review and approval**

☐ **Vendor security monitoring and assessment**

Quarterly Compliance Reviews

☐ **Form ADV update review** *(Brochure and supplement updates)*

☐ **Code of ethics compliance review**

☐ **Client portfolio review procedures**

☐ **Performance calculation verification**

☐ **Fee calculation and billing review**

Annual Compliance Requirements

☐ **Form ADV annual update filing** *(Including cybersecurity disclosure)*

☐ **Annual compliance review and testing**

☐ **Chief Compliance Officer annual report**

☐ **Client privacy notice distribution** *(If required)*

☐ **Books and records annual organization**

🔍 SEC EXAMINATION READINESS

Examination Documentation Preparation

☐ **Current Form ADV and all amendments**

☐ **Investment advisory agreements** *(All current client contracts)*

☐ **Code of ethics and personal trading records**

☐ **Marketing and advertising materials**

☐ **Compliance policies and procedures manual**

Specific Examination Areas

☐ **Cybersecurity and data protection evidence**

☐ **Fiduciary duty compliance documentation**

☐ **Fee calculation and billing accuracy**

☐ **Performance calculation methodology**

☐ **Client relationship management records**

💰 CLIENT ASSET & FUND SECURITY

Mutual Fund & ETF Management Security

☐ **Fund accounting system security** *(For fund advisors)*

- ☐ **Net asset value (NAV) calculation security**
- ☐ **Fund board communication security**
- ☐ **Shareholder communication security**
- ☐ **Fund distribution security procedures**

Private Fund Security Requirements

- ☐ **Private fund reporting security** *(Form PF compliance)*
- ☐ **Limited partner communication security**
- ☐ **Capital call and distribution security**
- ☐ **Side letter and term sheet security**
- ☐ **Fund audit coordination security**

📈 BUSINESS CONTINUITY FOR ADVISORY SERVICES

Investment Advisory Continuity Planning

- ☐ **Portfolio management continuity procedures**
- ☐ **Client communication during emergencies**
- ☐ **Trade execution backup procedures**
- ☐ **Succession planning security** *(Key person risk)*
- ☐ **Business transition security procedures**

Technology Failure Response

- ☐ **Portfolio management system failure procedures**
- ☐ **Client portal outage communication**
- ☐ **Market data feed backup procedures**
- ☐ **Communication system redundancy**
- ☐ **Research platform alternative access**

🌐 DIGITAL TRANSFORMATION SECURITY

Emerging Technology Integration

- ☐ **Artificial intelligence security protocols** *(AI-driven investment advice)*
- ☐ **Blockchain and cryptocurrency security** *(Digital asset management)*
- ☐ **Cloud computing security standards**
- ☐ **Social media compliance security** *(Advisor social media use)*
- ☐ **Video conferencing security protocols**

Innovation & Compliance Balance

- ☐ **New technology evaluation procedures**
- ☐ **Pilot program security requirements**
- ☐ **Client technology adoption support**
- ☐ **Regulatory change monitoring** *(Emerging regulation compliance)*
- ☐ **Industry best practice adoption procedures**

PAGE 10: DEBT COLLECTION REGULATORY FRAMEWORK

💳 INDUSTRY-SPECIFIC RISK PROFILE

Primary Data Types at Risk

- ☐ **Consumer debt information** *(Account balances, payment history)*
- ☐ **Social Security Numbers and identifying information**
- ☐ **Contact information** *(Phone numbers, addresses, email)*
- ☐ **Employment and income data** *(Ability to pay assessment)*
- ☐ **Payment arrangement records** *(Settlement and payment plans)*
- ☐ **Legal action documentation** *(Court filings and judgments)*
- ☐ **Third-party contact information** *(References and relatives)*
- ☐ **Communication records** *(Call logs, letters, emails)*

Debt Collection Threat Vectors

- ☐ **Consumer identity theft** *(Using collected personal data)*
- ☐ **Payment fraud** *(Unauthorized payment collection)*
- ☐ **Harassment and abuse** *(Misuse of contact information)*
- ☐ **Privacy violations** *(Disclosure to unauthorized parties)*
- ☐ **False debt claims** *(Fraudulent collection attempts)*
- ☐ **Communication interception** *(Unauthorized call monitoring)*
- ☐ **Database manipulation** *(Altering debt records)*
- ☐ **Insider fraud** *(Employee misuse of consumer data)*

📋 INTEGRATED REGULATORY REQUIREMENTS

FTC Safeguards Rule + FDCPA Compliance

- ☐ **Fair Debt Collection Practices Act (FDCPA) compliance**
- ☐ **Telephone Consumer Protection Act (TCPA) compliance**
- ☐ **Fair Credit Reporting Act (FCRA) integration**
- ☐ **Consumer Financial Protection Bureau (CFPB) oversight**
- ☐ **Gramm-Leach-Bliley Act privacy requirements**

State Debt Collection Laws

- ☐ **State licensing requirements compliance** *(Collection agency licenses)*
- ☐ **State-specific collection practice restrictions**
- ☐ **State data breach notification compliance**
- ☐ **State consumer protection law integration**
- ☐ **State court system security** *(Legal action filing)*

TCPA & Communication Compliance

- ☐ **Autodialer and robocall compliance**
- ☐ **Written consent documentation** *(TCPA consent requirements)*
- ☐ **Do Not Call Registry compliance**
- ☐ **Text message consent and security**
- ☐ **Revocation of consent processing**

CFPB Debt Collection Requirements

- ☐ **CFPB Debt Collection Rule compliance** *(Regulation F)*
- ☐ **Consumer complaint handling procedures**
- ☐ **Validation notice requirements**
- ☐ **Limited content message compliance**
- ☐ **Time-barred debt disclosures**

🔐 DEBT COLLECTION ACCESS CONTROLS

Collection Management System Security

- ☐ **Debt portfolio management system access controls**
- ☐ **Consumer account information segregation**
- ☐ **Collector access controls** *(Individual collector permissions)*
- ☐ **Supervisor access and monitoring capabilities**
- ☐ **Third-party debt buyer system integration security**

Communication System Security

- ☐ **Predictive dialer security** *(Autodialing system protection)*
- ☐ **Call recording system security** *(Encrypted storage)*
- ☐ **Email communication platform security**
- ☐ **SMS/text messaging platform security**
- ☐ **Letter generation and mailing system security**

👥 COLLECTOR & STAFF PROTOCOLS

Collector Training & Certification

- ☐ **FDCPA compliance training requirements**
- ☐ **State law training and certification**
- ☐ **Communication skills and de-escalation training**
- ☐ **Privacy and confidentiality training**
- ☐ **Technology and system security training**

Quality Assurance & Monitoring

- ☐ **Call monitoring and recording procedures**
- ☐ **Performance evaluation security**
- ☐ **Compliance scoring and tracking**
- ☐ **Consumer complaint resolution tracking**
- ☐ **Disciplinary action documentation security**

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💻 COMMUNICATION TECHNOLOGY SECURITY

Predictive Dialer & Call Management Security

☐ **Predictive dialer access controls** *(Authorized users only)*

☐ **Call disposition tracking security** *(Outcome recording)*

☐ **Abandoned call rate monitoring** *(TCPA compliance)*

☐ **Do Not Call scrubbing procedures** *(DNC list integration)*

☐ **Wrong number removal procedures** *(Contact accuracy)*

Call Recording & Monitoring Security

☐ **Digital call recording encryption** *(Secure storage)*

☐ **Call playback access controls** *(Authorized review only)*

☐ **Recording retention schedule compliance**

☐ **Quality assurance access controls** *(Supervisor review)*

☐ **Legal hold procedures for recordings** *(Litigation support)*

Multi-Channel Communication Security

☐ **Email platform integration security** *(Collection email systems)*

☐ **Text messaging compliance and security**

☐ **Postal mail generation security** *(Validation notice mailing)*

☐ **Digital payment portal security** *(Online payment acceptance)*

☐ **Consumer portal access controls** *(Account information access)*

🔒 CONSUMER DATA PROTECTION

Debt Portfolio Management Security

☐ **Debt purchase documentation security** *(Chain of title protection)*

☐ **Portfolio data validation procedures** *(Accuracy verification)*

☐ **Account placement security** *(Authorized collection only)*

☐ **Return to creditor procedures** *(Portfolio recall security)*

☐ **Charge-off and write-off documentation security**

Payment Processing Security

☐ **Payment processing system integration** *(PCI DSS compliance)*

☐ **Payment plan management security**

☐ **Settlement negotiation documentation**

☐ **Payment reversal and chargeback procedures**

☐ **Trust account management security** *(Client fund protection)*

📊 COMPLIANCE MONITORING & REPORTING

FDCPA Compliance Monitoring

- ☐ **Communication frequency tracking** *(Harassment prevention)*
- ☐ **Time and place restriction compliance**
- ☐ **Third-party communication monitoring** *(Limited disclosure)*
- ☐ **Cease and desist processing** *(Consumer request compliance)*
- ☐ **Validation notice delivery tracking**

State Regulatory Reporting

- ☐ **State licensing compliance reporting**
- ☐ **Collection activity reporting** *(State-required statistics)*
- ☐ **Consumer complaint reporting** *(State agency notifications)*
- ☐ **Bond and insurance compliance** *(Financial requirement maintenance)*

🏢 MULTI-STATE & LICENSING SECURITY

License Management Security

- ☐ **State collection license tracking** *(Active license verification)*
- ☐ **License renewal timeline management**
- ☐ **Surety bond compliance documentation**
- ☐ **State examination readiness procedures**
- ☐ **Cross-state operation compliance**

Legal Action Coordination Security

- ☐ **Court filing system security** *(Legal document protection)*
- ☐ **Judgment tracking and enforcement**
- ☐ **Asset discovery information security**
- ☐ **Garnishment processing security**
- ☐ **Legal counsel communication security**

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📅 COLLECTION COMPLIANCE CYCLE

Daily Compliance Activities

- ☐ **DNC list scrubbing procedures** *(Daily list updates)*
- ☐ **Call time restriction compliance** *(Time zone management)*
- ☐ **Consumer request processing** *(Cease and desist, validation)*
- ☐ **Payment processing and reconciliation**
- ☐ **System access audit and monitoring**

Weekly Compliance Reviews

- ☐ **Call monitoring and quality review**
- ☐ **Consumer complaint investigation**
- ☐ **Collection performance analysis**
- ☐ **Technology system performance review**
- ☐ **Training needs assessment**

Monthly Compliance Requirements

☐ **FDCPA compliance testing and scoring**

☐ **State regulatory compliance review**

☐ **Consumer complaint trend analysis**

☐ **Portfolio performance and accuracy review**

☐ **Third-party vendor security assessment**

🔍 REGULATORY EXAMINATION READINESS

CFPB Examination Preparation

☐ **Consumer complaint handling documentation**

☐ **FDCPA compliance evidence and testing**

☐ **Communication practice documentation**

☐ **Technology system compliance verification**

☐ **Staff training and qualification records**

State Regulator Examination Readiness

☐ **Current licensing and bond documentation**

☐ **State-specific compliance evidence**

☐ **Collection activity records and statistics**

☐ **Consumer protection compliance documentation**

☐ **Financial records and trust account management**

💰 CLIENT & CREDITOR RELATIONSHIP SECURITY

Creditor Client Management Security

☐ **Client placement agreement security** *(Contract protection)*

☐ **Remittance processing security** *(Payment forwarding)*

☐ **Client reporting system security** *(Collection activity reports)*

☐ **Portfolio return procedures** *(End of placement)*

☐ **Client data segregation** *(Multi-client security)*

Debt Buyer Relationship Security

☐ **Purchase agreement security** *(Debt acquisition contracts)*

☐ **Due diligence documentation security**

☐ **Portfolio valuation security** *(Asset assessment)*

☐ **Legal compliance verification** *(Debt validity)*

☐ **Ongoing ownership documentation**

📈 BUSINESS CONTINUITY & DISASTER RECOVERY

Collection-Specific Continuity Planning

☐ **Dialer system backup and redundancy**

☐ **Call center alternative site procedures**

☐ **Consumer contact continuity during outages**

☐ **Payment processing backup procedures**

☐ **Legal action deadline management**

Technology Failure Response

☐ **Communication system failure procedures**

☐ **Database backup and recovery testing**

☐ **Payment system failure protocols**

☐ **Record keeping system redundancy**

☐ **Compliance monitoring system backup**

🌐 EMERGING TECHNOLOGY & COMPLIANCE

Digital Collection Innovation Security

☐ **Artificial intelligence compliance** *(AI-driven collection strategies)*

☐ **Social media monitoring security** *(Consumer contact verification)*

☐ **Mobile application security** *(Consumer payment apps)*

☐ **Chatbot and automation compliance** *(FDCPA compliance)*

☐ **Video communication security** *(Virtual collection meetings)*

Consumer Protection Technology

☐ **Privacy-enhancing technology implementation**

☐ **Consent management platform security**

☐ **Communication preference management**

☐ **Automated compliance monitoring tools**

☐ **Consumer self-service portal security**

⚖️ LITIGATION & LEGAL COMPLIANCE

Legal Action Security Procedures

☐ **Court document preparation security**

☐ **Service of process documentation**

☐ **Settlement negotiation confidentiality**

☐ **Judgment collection security**

☐ **Appeals process documentation security**

Regulatory Defense Preparation

☐ **Audit response procedures**

☐ **Investigation cooperation protocols**

☐ **Penalty mitigation documentation**

☐ **Corrective action implementation**

☐ **Ongoing compliance demonstration**

COLLECTION FOOTER: NEED EXPERT HELP?

📞 RebootTwice Industry Expertise

Specialized Services for Each Industry:

- **Tax Preparation:** IRS Publication 4557 integration

- **Mortgage:** CFPB & GSE compliance coordination

- **Investment Advisory:** SEC Form ADV cybersecurity disclosure

- **Debt Collection:** FDCPA & consumer protection compliance

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Our Industry Credentials:

- **30+ Years** in financial services compliance

- **CISSP & CISM** certified cybersecurity experts

- **100% Success Rate** - no client penalties to date

- **Industry-Specific Experience** in all four verticals