

ALTA Best Practices Framework:

# Assessment Procedures

*Version 4.0*






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## ALTA Best Practices Framework

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The ALTA Best Practices Framework has been developed to assist title agencies, and title insurers to optimize their practices and procedures to ensure financial and data security, operational stability, and to meet regulatory requirements along with fulfilling customer needs and requirements. The ALTA Best Practices Framework is comprised of the following documentation that can be utilized by a company to implement the Best Practices program:

- ALTA Best Practices Framework: Title Insurance and Settlement Company Best Practices
- ALTA Best Practices Framework: Assessment Procedures
- ALTA Best Practices Framework: Certification Package (Company may choose either the *Internal Assessment Representation Report and Letter* or the *Third-Party Assessment Procedures Report*)

## Version History and Notes

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Date	Version	Notes
7/19/2013	2.0	Publication of the ALTA Best Practices Framework: Assessment Procedures, along with other documents in the ALTA Best Practices Framework, as approved by the ALTA Board on July 19, 2013. This is the first publication of the ALTA Best Practices Framework: Assessment Procedures.
11/13/2014	2.1	Amendment to Assessment Procedure 3.09(a) pursuant to a motion approved by the Board of Governors to remove the reference to encryption of data at rest.
10/7/2016	2.5	Publication of the revised ALTA Title Insurance and Settlement Company Best Practices (including addition of third-party signing professionals provision), along with other documents in the ALTA Best Practices Framework, approved by the ALTA Board of Governors on September 19, 2016.
10/17/2019	3.0	Publication of the revised ALTA Title Insurance and Settlement Company Best Practices, along with other documents in the ALTA Best Practices Framework, approved by the ALTA Board of Governors on June 6, 2019.
1/23/2023	4.0	Publication of the revised ALTA Title Insurance and Settlement Company Best Practices, approved by the ALTA Board of Governors on October 13, 2022, along with other documents in the ALTA Best Practices Framework, including this document, the <i>ALTA Best Practices Framework: Assessment Procedures</i> . Publication on January 23, 2023, with an effective date of May 23, 2023.

### **Please Note**

**Utilize these ALTA Best Practices Assessment Procedures to determine Company's compliance with the ALTA Best Practices. If any exceptions are noted for any of the testing procedures, the exceptions should be documented and reported. A final assessment or audit report issued should include a list of exceptions noted by section and may include any explanations or action plan provided by Company.**

#### Capitalized Terms:

- Capitalized Terms appearing in both these Assessment Procedures and the *ALTA Best Practices Framework: Title Insurance Settlement Company Best Practices* ("Best Practices") shall have the meanings set forth in the Best Practices document.

#### Documentation Guidelines:

- Detailed notes or documentation copies should be maintained for a minimum of five (5) years to support testing performed and testing exceptions for each procedure.

#### Testing Guidelines:

- Where possible, the same file sample may be used throughout the assessment to test multiple procedures.

#### Not Applicable (NA):

- Some of the Assessment Procedures will not be applicable to some Companies due to laws, regulations, or business model. Inapplicability of an Assessment Procedure does not result in a "Yes" in the "Exceptions Noted" column for such procedure, but a "NA" designation should be used instead.



Assessment Procedure Number	ALTA Best Practices Framework: Assessment Procedures	Exceptions Noted? (Y / N)
	<p><b>ALTA Best Practice 1:</b></p> <p><b>Establish and maintain current License(s) as required to conduct the business of title insurance and Settlement services.</b></p>	
1.01	<p>Confirm that Company has a process for monitoring and tracking the current License(s) as required to conduct the business of title insurance and settlement services.</p>	Y / N
1.02	<p>Confirm the active status of Company and/or individual Licenses/registrations for each state in which Company conducts business. In states where Title Insurer appointments are required, ensure that Company and/or individual producers are appointed by each Title Insurer as applicable.</p> <p>Documentation reviewed may include actual licenses, Department of Insurance or appropriate state regulatory agency websites/screenshots, Bar Association status, corporate registration(s), business registration(s), evidence of appointments with the state, and other documentation as applicable to state/license.</p> <p>Sample Selection:</p> <ul style="list-style-type: none"> <li>Review a list of states in which Company conducts business and a list of licensed employees. Select a sample of files and verify that Company and/or individual(s) disbursing or signing documents maintain appropriate current and valid licensing in accordance with the state's laws and regulations.</li> </ul>	Y / N
1.03	<p>View Company's active ALTA Policy Forms License or verify compliance on ALTA website.</p>	Y / N
1.04	<p>For each Company office location performing settlement services, verify that Company has established a listing in the ALTA Registry (subject to those business entity types supported by the ALTA Registry).</p>	Y / N



Assessment Procedure Number	ALTA Best Practices Framework: Assessment Procedures	Exceptions Noted? (Y / N)
	<p><b>ALTA Best Practice 2:</b></p> <p><b>Adopt and maintain appropriate written procedures and controls for the protection of Escrow Trust Accounts allowing for electronic verification of reconciliation.</b></p> <p><i>Note: These procedures apply to all custodial or fiduciary accounts, including closing and disbursement accounts, recording and tax accounts, construction disbursing accounts, Title Insurer remittance/premium accounts, and other similar accounts.</i></p>	
2.01	Obtain Company’s written procedures and controls regarding hiring and training related to Escrow Trust Accounts.	Y / N
2.02	<p>Obtain a complete listing, certified by Company, of ALL open (active and inactive; escrow and non-escrow) bank accounts and authorized signers, wire initiators, and approvers on the accounts.</p> <ol style="list-style-type: none"> <li>a. Verify that Company is not comingling fiduciary funds, including Title Insurer’s portion of the premium, with operating funds. Review active listing of employees to ensure signers, wire initiators, and approvers are actively employed.</li> <li>b. If signatory stamps are being used to sign escrow checks, test to confirm only authorized signers have access to the stamp.</li> <li>c. Ensure there are procedures for conducting 5-year Background Checks upon hiring and every 3 years thereafter. Select a sample of signors and obtain an invoice or documentation showing completion of Background Checks. Review Company’s written plan to evaluate Background Check results to mitigate potential risks discovered during the review.</li> <li>d. Ensure Company deposits certified funds to comply with good funds requirements and Title Insurer requirements/guidelines prior to disbursing from Escrow Trust Accounts.</li> <li>e. Verify compliance with Company’s process for training employees on management of escrow funds and Escrow Trust Accounts. Training should include awareness of digital funds transfer, good funds laws, and wire transfer fraud preventions.</li> </ol>	Y / N



Assessment Procedure Number	ALTA Best Practices Framework: Assessment Procedures	Exceptions Noted? (Y / N)
2.03	<p>Obtain two (2) month-end Three-Way Reconciliations for each Escrow Trust Account and perform the following:</p> <p><i>Note: Three-Way Reconciliation documentation at a minimum includes bank statement, reconciliation sheet/summary page with book balance, outstanding deposits list/deposits in transit, open escrow file listing or trial balance and outstanding disbursements list, all as of the reconciliation date. Compare: (1) the Trial Balance, (2) the book balance, and (3) the reconciled bank balance to ensure all three parts agree. If they do not agree the difference must be investigated and corrected.</i></p> <p><u>Definition of Significant items:</u></p> <ul style="list-style-type: none"> <li>• Deposits in transit over \$10,000 over 3 business days old.</li> <li>• Aggregate transactions over \$10,000 for shortages.</li> <li>• Outstanding checks depending on payee as noted in sub-procedure 2.03.k in excess of \$5,000 over 180 days old, mortgage payoffs over 10 business days old.</li> </ul> <p><u>Definition of Active versus Inactive/Dormant Accounts:</u></p> <ul style="list-style-type: none"> <li>• Active Account - Used for current transactions.</li> <li>• Inactive/Dormant Account:                             <ul style="list-style-type: none"> <li>○ No new significant incoming funds into account.</li> <li>○ No disbursements related to new closings from account.</li> <li>○ Minimal activity through account in last six months (dormant).</li> </ul> </li> </ul> <p><u>Sample Selection:</u></p> <p>Based on a review of the reconciliations selected, sample exceptions noted as defined above, as well as exceptions noted from the review of sections a. - n. below:</p> <ul style="list-style-type: none"> <li>a. Verify that reconciliations were completed monthly and within 10 business days of the closing date of the bank statement.</li> </ul>	Y / N



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2.03	<ul style="list-style-type: none"> <li>b. Verify that daily reconciliations of the receipts and disbursements and monthly Three-Way Reconciliations are prepared independently, if size of agency permits, by someone not associated with the receipt and disbursement function. The daily reconciliation of the receipts and disbursements is not applicable to Inactive/Dormant Accounts. Verify accounts are Three-Way reconciled, which includes being supported by a detailed trial balance listing of open escrow files.</li> <li>c. Verify that reconciliations are reviewed and signed off by management or a supervisor.</li> <li>d. Verify that reconciliations, bank statements, and supporting documentation can be provided to Company’s contracted Title Insurers upon request.</li> <li>e. Determine whether accounts are in balance, contain all supporting reports and that a proper Three-Way Reconciliation is being produced. The book balance, reconciled bank balance, and trial balance should be in agreement.</li> <li>f. Verify that the bank statements and account related documentation for each Escrow Trust Account is clearly labeled by the bank as an Escrow Trust Account and that the Escrow checks and deposit tickets/records clearly identify the associated file numbers.</li> <li>g. Verify opening bank and book balances to ending balance on prior month’s reconciliation or differences are identified.</li> <li>h. Review bank statement activity noting bank charges, insufficient funds charges, and negative daily balances; investigate and confirm resolution. Verify that all bank charges are funded by Company’s operating account within 5 business days of the earlier of discovery or completion of reconciliation.</li> <li>i. Test Significant deposits in transit listed on the most current reconciliation. If they are older than 3 business days, investigate and determine if there is a true shortage and verify resolution or funding.</li> </ul>	Y / N



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2.03	<ul style="list-style-type: none"> <li>j. Determine Company's process for follow up on outstanding checks, including procedures for escheating funds. Verify clearing or adherence to follow-up process for significant outstanding checks including, but not limited to, checks to recording clerk, tax collector, hazard insurance provider, Title Insurer, or checks for mortgage payoffs and any other high-risk items.</li> <li>k. Review the Trial Balance for dormant funds that may be eligible for escheatment to ensure Company is following its procedures. Test significant file shortages, dormant funds (significant file balances over 180 days), and significant miscellaneous files to verify documentation of their status and that shortages were funded within 5 business days of the earlier of discovery or completion of reconciliation. Ensure management approval is documented for disbursement activity on files and balances dormant more than six months.</li> <li>l. Review and test adjustments (reconciling items) needed to bring the account in balance and verify their validity.</li> <li>m. From a review of cancelled checks or disbursement registers, select a sample across accounts and test checks, if any, and wires that may require further review, such as checks going back into Escrow, disbursements paid to cash or employees, amounts transferred between accounts, suspicious payees, multiple disbursements to the same payees, large round dollar amounts and any other questionable disbursements. These disbursements should be agreed to a closing file and Settlement statement.</li> <li>n. Verify Company procedures for daily clearing and reconciliation of the receipts and disbursements.</li> </ul>	Y / N
2.04	If Company is holding any customer investment accounts, select a sample of interest-bearing trust accounts. Verify that Company maintains records/documentation supporting activity for interest bearing (customer investment) Escrow Trust Accounts.	Y / N
2.05	For all Escrow Trust Accounts, determine whether the Escrow Trust Accounts are maintained at Federally Insured Financial Institutions unless directed by the beneficial owner.	Y / N





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2.06	<p>For accounts reviewed in Assessment Procedure 2.03, verify the following:</p> <ul style="list-style-type: none"> <li>a. Ensure transactions are only conducted by authorized employees. Ensure former employees are immediately deleted from bank signature cards or online access.</li> <li>b. Verify Positive Pay on active accounts, if available for the payment type. Review bank documentation such as monthly account analysis statement or bank positive pay entitlement documentation.</li> <li>c. Company has policies and procedures in place that prohibit or control the use of ACH and international wire transfers to protect against unauthorized transactions.</li> <li>d. If Company is utilizing web based fintech applications to receive funds, ensure Company has procedures to vet the vendor to understand the risk, including the inability to “claw back” funds due to application of the Electronic Funds Transfer Act and that the utilization of service complies with any applicable good funds requirements.</li> <li>e. Test files to ensure funds received comply with “good funds laws” as defined by state laws and regulations, and Title Insurer requirements.</li> </ul>	Y / N
2.07	<p>For wire activity:</p> <ul style="list-style-type: none"> <li>a. Obtain Company’s written wire transfer procedure and verify that the procedure includes: (1) for outgoing wire transfers, verification of wire transfer instructions independent of initial communication; (2) for incoming wire transfers, a procedure to alert consumers regarding the risks of wire fraud and guidelines to mitigate losses; (3) includes multi-factor authentication and is similar in nature to the ALTA Outgoing Wire Preparation Checklist; and (4) a commitment to review the procedure at least annually.</li> <li>b. Obtain Company’s written wire fraud response procedure and verify that it substantially conforms to the ALTA Rapid Response Plan for Wire Fraud Incidents, is reviewed at least annually, and updated when necessary.</li> </ul>	Y / N



<b>Assessment Procedure Number</b>	<b>ALTA Best Practices Framework: Assessment Procedures</b>	<b>Exceptions Noted? (Y / N)</b>
2.08	If Company utilizes a wire transfer verification service provider, ensure Company has written procedures related to vetting the provider to understand the risks of use, security protocols, and the provider's processes to protect Consumer data.	Y / N



Assessment Procedure Number	ALTA Best Practices Framework: Assessment Procedures	Exceptions Noted? (Y / N)
	<p><b>ALTA Best Practice 3.</b></p> <p><b>Adopt and maintain a written information security plan (“WISP”) and a written privacy plan to protect NPI as required by local, state, and federal law.</b></p> <p><i>Note: These Assessment Procedures should be applied as appropriate to Company’s size and complexity, the nature and scope of Company’s activities, and the sensitivity of the Non-public Personal Information (“NPI”) Company handles.</i></p>	
3.01	<p>Obtain Company’s WISP designed to protect its NPI and verify that the program is reviewed and updated as necessary, at least annually. The program should at a minimum ensure all sections of ALTA Best Practice 3 are included.</p>	Y / N
3.02	<p>Obtain evidence that employees were trained in Company’s WISP upon hiring and that refresher training is conducted for all employees annually.</p>	Y / N
3.03	<p>Obtain Company’s information security risk assessment, including the risk ranking (e.g., low, medium, high) recognizing the potential probability of occurrence and impact on information systems.</p> <p>Review Company’s process for assessing risk to its customer information and verify that it includes the following:</p> <ul style="list-style-type: none"> <li>a. Locations, systems, and methods for storing, processing, transmitting, and disposing of its customer information.</li> <li>b. Potential internal and external threats that could result in a breach, unauthorized disclosure, misuse, alteration, or destruction of NPI or customer information systems and assessments of the likelihood and potential damage to Company and its customers of these threats.</li> </ul>	Y / N



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3.04	Verify that key controls, systems, and procedures in the WISP are regularly tested by independent staff in accordance with the risk assessment.  Specifically, review that the following are included in the testing: <ul style="list-style-type: none"> <li>a. Management’s documented approach for testing the WISP and evidence of testing.</li> <li>b. Frequency of testing of the WISP.</li> <li>c. Documentation of approach for tracking and remediating exceptions and/or control gaps.</li> </ul>	Y / N
3.05	Verify employees are required to review an acceptable use of information technology assets policy at least annually (e.g., acceptable use of the Internet, email, and Company information resources).	Y / N
3.06	Obtain and review written policies and procedures to verify logical access to information systems (e.g., network, data base, and application layers) containing NPI is restricted to authorized persons only, is periodically reviewed as needed or at least annually, and access changes are documented resulting from the reviews.	Y / N
3.07	<ul style="list-style-type: none"> <li>• Select a sample of employees with access to NPI:                             <ul style="list-style-type: none"> <li>○ Test the user access provisioning process to determine if access has documented approval in accordance with policy prior to granting.</li> <li>○ Obtain evidence (e.g., invoice/documentation in personnel files) that Background Checks were conducted upon hiring or within the past 3 years.</li> </ul> </li> <li>• Select a sample of terminated employees.                             <ul style="list-style-type: none"> <li>○ Verify the user access was removed per policy.</li> </ul> </li> <li>• Verify administrative access rights (e.g., ability to add, modify and remove user access) to systems containing NPI are not assigned to personnel performing business transactions within the system.</li> <li>• Verify access review is being performed by management at least annually to confirm that employees only have access to customer information or customer information systems which are necessary to perform their job functions.</li> </ul>	Y / N

Assessment Procedure Number	ALTA Best Practices Framework: Assessment Procedures	Exceptions Noted? (Y / N)
3.07	<ul style="list-style-type: none"> <li>• Verify that logical access controls to the network and information systems containing NPI are in place.                             <ul style="list-style-type: none"> <li>○ Obtain listing of user IDs for systems with NPI. Verify IDs are unique and assigned to specific users.</li> <li>○ Test Company’s WISP to ensure the password management includes:                                     <ul style="list-style-type: none"> <li>- Multi-factor authentication, if available, that requires multiple credentials (factors) for access to systems containing NPI.</li> <li>- Unique login names and system passwords assigned to individual users to access systems containing NPI. System passwords must meet minimum standards which include:                                             <ul style="list-style-type: none"> <li>▪ re-entry of the password after system idling;</li> <li>▪ passwords that expire after a certain period of time;</li> <li>▪ difficult-to-guess passwords that include a combination of uppercase letters, lowercase letters, special characters, with a minimum length of eight total characters.</li> </ul> </li> </ul> </li> </ul> </li> </ul>	Y / N
3.08	<ul style="list-style-type: none"> <li>• Review policies restricting or controlling the use of removable media (e.g., USB ports and devices, CD/DVD writable drives and media).</li> <li>• Obtain evidence that system configuration settings are consistent with the policy.</li> </ul>	Y / N
3.09	<ul style="list-style-type: none"> <li>• Determine if Company utilizes encryption or a secure delivery method for NPI.</li> <li>• Obtain evidence demonstrating the use of encryption or alternative secure delivery method for NPI.</li> </ul>	Y / N



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3.10	<ul style="list-style-type: none"> <li>Obtain and review documented procedures for monitoring and detecting attacks/intrusions into customer information systems and responding to incidences. If monitoring of external threats has been outsourced, obtain evidence of reporting and subsequent management review.</li> <li>Select a sample of notifications of security alerts and verify management’s follow-up activity.</li> <li>Obtain and review documented procedures for security breach notification, including evidence of program review at least annually. Procedures must align with the specific state breach reporting and notification requirements.</li> <li>Obtain and review documented procedures for monitoring, detecting, and responding to incidences of attacks/intrusions into customer information systems. If monitoring of external threats has been outsourced, obtain evidence of reporting and subsequent management review.</li> <li>Select a sample of notifications of security alerts and verify management’s follow-up activity.</li> </ul>	Y / N
3.11	<ul style="list-style-type: none"> <li>Obtain and review the clean desk policy and verify compliance through inspection.</li> <li>Verify access to work areas and physical locations containing customer information, such as buildings, computer facilities and record storage facilities, is limited to authorized personnel only. Inspect physical locations to verify that they are secured and access is limited to authorized personnel.</li> </ul>	Y / N
3.12	<ul style="list-style-type: none"> <li>Obtain and review change management procedures when technology and business function changes are made.</li> <li>Ensure there are procedures in place which require timely software updates for systems that require routine updates to systems, software, and code.</li> <li>Verify procedures are in place to determine that systems modifications to hardware and software are consistent with the approved security program. Specifically, test a sample of hardware or software changes to verify that they are documented, tested, and approved.</li> </ul>	Y / N

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3.12	<ul style="list-style-type: none"> <li>• Verify there is a written incident response plan. The plan should be designed to promptly respond to, and recover from, a cybersecurity incident and include:                             <ul style="list-style-type: none"> <li>○ all the recommendations of the <a href="#">ALTA Cybersecurity Incident Response Plan template</a>;</li> <li>○ single point of contact;</li> <li>○ contact list of authorities for security incident notifications;</li> <li>○ cyber and breach insurance and carrier contacts for incident and claim reporting.</li> </ul> </li> <li>• Verify Company's process for periodic reviews, at least annually, of security controls and Company's WISP and make appropriate changes to address emerging threats and risks to Company's information systems and NPI.</li> <li>• Verify Company has procedures related to training management and employee compliance with Company's WISP, and alerts to current and developing cybersecurity threats.</li> </ul>	Y / N
3.13	<ul style="list-style-type: none"> <li>• Obtain Company's procedure for data and system backup and business resumption to protect against destruction, loss, or damage of information from potential environmental hazards, such as fire and water damage or technological failures.</li> <li>• Verify that the disaster management plan is routinely tested with results documented.</li> </ul>	Y / N
3.14	<p>Determine whether Company provides NPI to any other party, including third-party entity, system, or service, or whether any other party, entity, system, or service has access to NPI through system(s) or service(s) provided directly to Company.</p> <ol style="list-style-type: none"> <li>a. Verify and obtain evidence that Company conducted due diligence in selecting its service providers and takes information security into consideration when performing due diligence.</li> <li>b. Verify that Company has controls to monitor security procedures of service providers to safeguard customer information (e.g., review of Background Checks, audits, security reviews or tests, intrusion logs). Verify that the third-party is maintaining adequate cyber and breach insurance.</li> </ol>	Y / N



Assessment Procedure Number	ALTA Best Practices Framework: Assessment Procedures	Exceptions Noted? (Y / N)
3.14	c. If Company has remotely hosted or remotely accessible systems for storing, transmitting, or transferring NPI, verify that Company utilizes multi-factor authentication for all access points.	Y / N
3.15	Verify the existence of Company’s Privacy Policy and its process of giving notice to customers. If Company does not have a website, ensure that notice is provided directly to customers in a usable format.	Y / N
3.16	Determine whether Company maintains a website. If so, inspect Company's website and verify the following: a. The website includes Company’s Privacy Policy. b. The website's Privacy Policy accurately discloses what NPI is obtained on the site and provides a link or contact information for users or customers to obtain more information.	Y / N
3.17	<ul style="list-style-type: none"> <li>• Obtain and inspect policies and procedures for record retention and disposal. Verify procedures are in place for disposal of NPI.</li> <li>• If document/electronic media disposal services are provided by a third-party, obtain evidence of the contract agreement/SLA and a recent document disposal certificate from the vendor.</li> </ul>	Y / N





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	<p><b>ALTA Best Practice 4.</b></p> <p><b>Adopt standard real estate Settlement policies and procedures that help ensure compliance with: (i) federal and state consumer financial protection laws and regulations, and (ii) contractual obligations as applicable to the Settlement process.</b></p>	
4.01	Obtain and/or document Company’s written procedures to maintain compliance with all sections of ALTA Best Practice 4.	Y / N
4.02	<p>Review Company documents and a selection of closed files for the following:</p> <ul style="list-style-type: none"> <li>a. For completion of the Settlement, ensure Company has procedures related to training staff to minimize errors in completing the Settlement, respond timely to concerns raised by parties to the Settlement, and that such written procedures were followed in the sampled closed files.</li> <li>b. For title insurance premiums and other fees, ensure Company has written procedures related to charging the appropriate title insurance premiums and other fees for services provided and such written procedures were followed in the sampled closed files.</li> <li>c. Confirm Company is utilizing rate manuals and/or online calculators, as appropriate, to ensure correct amounts are being charged for title insurance policy premiums, state or Company-specific fees, and endorsements.</li> <li>d. Ensure discounted/reissue rates are calculated and charged when appropriate, including refinance or reissue premiums.</li> <li>e. Confirm that refunds and other fees are timely issued to Consumers when an overpayment is detected.</li> <li>f. For Affiliated Business Arrangements, ensure Company has written policies and procedures regarding compliance with state and federal laws for any affiliated business arrangements in which Company participates and such written procedures were followed in the sampled closed files.</li> </ul>	Y / N



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4.02	g. For execution of Settlement documents, ensure that there are written procedures regarding the preparation and proper execution of Settlement documents and such written procedures were followed in the sampled closed files.	Y / N
4.03	Review Company documents and a selection of closed files for the following: <ul style="list-style-type: none"> <li>a. For all signing professionals, verify that all signing professionals possess the appropriate state licensing and insurance to notarize documents (both in person and remotely, if applicable), conduct the Settlement (if applicable), and safeguard NPI.**</li> <li>b. For signing professionals who are Company employees, verify that Company has written procedures to perform Background Check(s) for employees who conduct Settlements or who have access to Settlement documents and funds.</li> <li>c. For signing professionals who are third-parties, confirm that Company maintains the signing professional’s current state licensure, where required, or a recognized and verifiable industry designation; E&amp;O insurance; and Notary surety bond, if required by state law and/or Title Insurer.**</li> <li>d. Confirm that each signing professional has signed an acknowledgment of compliance with Company’s instructions and Company’s WISP.</li> <li>e. For Remote Notarization Platforms, ensure that Company selects a remote notarization platform(s) authorized by the state in which the notary public is located and that is approved by the Title Insurer, as applicable.</li> </ul> <p><i>**NOTE: Company may engage a vendor who may assume the obligations to monitor and verify that the third-party signing professional complies with ALTA Best Practices requirements.</i></p>	Y / N



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4.04	<p>From the selected closed files, perform the following to confirm that Company is recording documents pursuant to legal and contractual requirements:</p> <ul style="list-style-type: none"> <li>a. Verify that Company submitted the documents electronically or delivered documents for recording to the appropriate recording jurisdiction or the person or entity responsible for recording within two (2) business days of the later of: (i) the date of Settlement, or (ii) receipt by Company if the Settlement is not performed by Company.</li> <li>b. For e-recording, confirm that Company utilizes an e-recording vendor which complies with local laws and requirements, and that Company has a contract or agreement in place with the e-recording vendor.</li> <li>c. Confirm that Company tracked the delivery and recording of the document(s) and, if any documents were rejected for recording, that Company timely and appropriately addressed the rejection.</li> <li>d. Verify that Company maintains a record of the recording information.</li> <li>e. For Escrow Trust Accounts utilized to pay costs to record documents, ensure that Company complies with written procedures and controls for Company’s Escrow Trust Accounts and such written procedures were followed in the sampled closed files.</li> </ul>	Y / N



Assessment Procedure Number	ALTA Best Practices Framework: Assessment Procedures	Exceptions Noted? (Y / N)
	<p><b>ALTA Best Practice 5</b></p> <p><b>Adopt and maintain written procedures related to title policy production, delivery, reporting and premium remittance.</b></p>	
5.01	Obtain Company's written procedures and controls for title policy production, delivery, reporting and premium remittance.	Y / N
5.02	<p>Using a representative sample of files, perform the following (Note: this sample can be the same as used for Assessment Procedure 4.03):</p> <ul style="list-style-type: none"> <li>a. Verify title insurance policies were issued within (30) days of the date of Settlement or the date that the title insurance commitment terms and conditions were satisfied, unless statutory or regulatory requirements deem that an earlier delivery date is necessary.</li> <li>b. Verify that policies were reported to the Title Insurer (including a copy of the policy, if required), within forty-five (45) days of the date of Settlement or the date that the title insurance commitment terms and conditions were satisfied, unless applicable statutory, regulatory, or contractual obligations require earlier reporting.</li> <li>c. Verify that the correct portion of the premium collected for each file was remitted to the Title Insurer in accordance with applicable statutory, regulatory, and contractual obligations.</li> </ul>	Y / N



Assessment Procedure Number	ALTA Best Practices Framework: Assessment Procedures	Exceptions Noted? (Y / N)
	<p><b>ALTA Best Practice 6</b></p> <p><b>Maintain appropriate insurance and fidelity coverage.</b></p>	
6.01	<ul style="list-style-type: none"> <li>• Obtain a list of Company’s current professional liability insurance or errors and omissions insurance, fidelity coverage, surety bonds, and any Crime or Cyber insurance coverages including coverage amounts and expiration dates. Verify accuracy of the list by comparison to policy declaration pages.</li> <li>• Verify that Company maintains professional liability insurance or errors and omissions insurance, fidelity coverage, or surety bonds in accordance with the contractual agreement with Company’s Title Insurer(s).</li> <li>• If coverage is required by state law, verify that coverage meets minimum requirements for each state in which Company is licensed.</li> <li>• Verify that Company discusses coverage with their casualty/liability insurance agent or broker at least annually to ensure that the insurance coverage meets current insurance requirements.</li> </ul>	Y / N



Assessment Procedure Number	ALTA Best Practices Framework: Assessment Procedures	Exceptions Noted? (Y / N)
	<b>ALTA Best Practice 7</b> <b>Adopt and maintain written procedures for resolving Consumer complaints.</b>	
7.01	Obtain written policies and procedures for tracking and resolving Consumer complaints. Verify that the following are included: <ul style="list-style-type: none"> <li>a. A standard complaint form is utilized that identifies information that connects the complaint to a specific transaction and provides information to understand the nature and scope of the complaint.</li> <li>b. A single point of contact and/or department has been established for Consumer complaints.</li> <li>c. Procedures have been established for forwarding complaints to appropriate personnel.</li> <li>d. A written or electronic log of Consumer complaints is maintained that includes whether resolution is necessary and how resolved.</li> </ul>	Y / N
7.02	Obtain the Consumer complaints log and verify Company followed the procedural guidelines for addressing complaints.	Y / N