



CONSUMER FINANCE

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About Navigant

Navigant, Inc. (NYSE: NCI) is a specialized, global professional services firm that helps clients take control of their future. Navigant's team of experts combines deep industry knowledge with technical expertise to help clients to build, manage and protect their business interests. With a focus on industries and clients facing transformational change and significant regulatory and legal issues, the Firm serves clients primarily in the healthcare, energy and financial services sectors. Across our range of consulting, outsourcing, and legal dispute resolution services, Navigant's practitioners bring sharp insight that pinpoints opportunities and delivers powerful results. More information about Navigant can be found at navigant.com.

CONSUMER FINANCE COMPLIANCE SERVICES

Navigant is a recognized expert in providing financial services compliance solutions. We provide leading-edge solutions and insights to help our clients manage the changing regulatory environment. Our breadth of service offerings and industry experts allows us to provide a wide range of compliance services and solutions with in-depth knowledge targeted to your specific needs.

LAWS & REGULATIONS EXPERTISE

- Real Estate Settlement Procedures Act (RESPA / Reg. X)
- Truth in Lending Act (TILA / Reg. Z)
- Home Mortgage Disclosure Act (HMDA / Reg. C)
- Fair Credit Reporting Act (FCRA / Reg. V)
- Homeowner's Protection Act (HPA)
- Fair Debt Collection Practices Act (FDCPA)
- Equal Credit Opportunity Act (ECOA / Reg. B)
- Gramm-Leach-Bliley Act (GLBA) and Privacy of Consumer Financial Information (Reg. P)
- Truth in Savings Act (Reg. DD)
- Flood Disaster Protection Act
- Homeownership Counseling Act
- Servicemembers Civil Relief Act (SCRA)
- S.A.F.E. Mortgage Licensing Act (Reg. G & H)
- Unfair and Deceptive and Abusive Acts or Practices (UDAAP)
- Telephone Consumer Protection Act (TCPA)
- Electronic Signatures in Global and National Commerce Act (ESIGN)
- Extensions of Credit to Insiders (Reg. O)
- Transactions between Member Banks and their Affiliates (Reg. W)

FINANCIAL PRODUCTS

- Mortgage Loans
- HELOCs
- Credit Cards
- Auto Lending
- Student Lending
- Unsecured Lending
- Indirect Auto Lending
- Deposits
- Overdraft Protection

NAVIGANT CONSUMER FINANCE COMPLIANCE SERVICES

Our team of regulatory and product experts work closely with our clients and devise the right approach to meet any consumer finance compliance challenge or need through the following key service offerings:

LOAN FILE REVIEWS & COMPLIANCE TESTING

- Diagnostic compliance reviews
- Pre-regulator mock exams & readiness assessments
- Development and integration of regulatory requirements intake processes
- Control evaluation and testing methodology
- Consent Order and AG Settlement compliance
- Regulatory exam response support
- Assistance in remediating specific compliance / control gaps
- Product-specific design & positioning reviews

PROCESS IMPROVEMENT & RISK MANAGEMENT

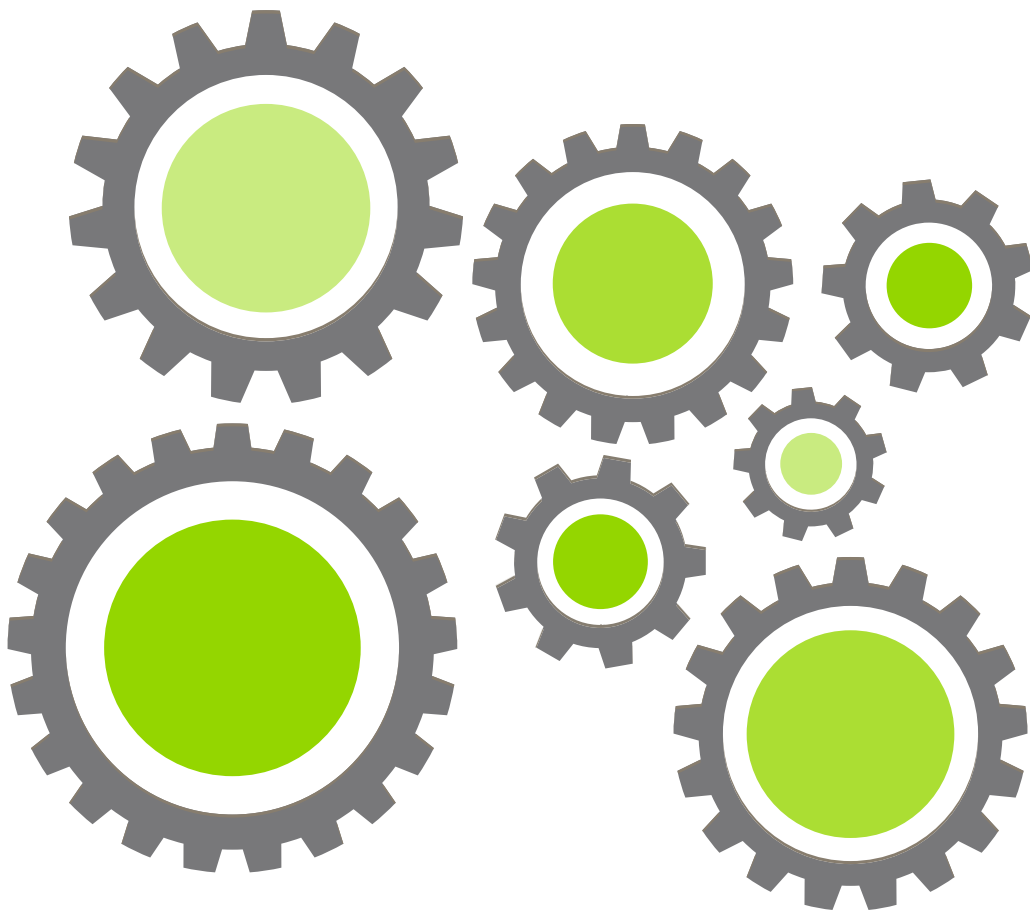
- Process analysis, reengineering, and change management
- Quality review assessment / enhancement of policies and procedures
- Performance metrics review and development key risk indicators
- Organizational reviews and development of target operating models
- Operational risk effectiveness & efficiency reviews
- Staff augmentation & compliance strategy
- Rapid stand-up of QC / compliance / monitoring program

COMPLIANCE ANALYTICS & TECHNOLOGY SOLUTIONS

- Fair Lending & Fair Servicing analytics
- Compliance & financial model validation
- Automated loan transaction analytics
- Quantitative portfolio compliance risk analytics and risk management dashboard reporting
- FCRA / Metro 2[®] reporting analytics
- Technology effectiveness & full life cycle support
- Borrower fees and loan cost evaluator
- Audit case management systems

WHY NAVIGANT

- Navigant professionals spend hundreds of thousands of hours each year working on dozens of regulatory and compliance engagements.
- Navigant has executed hundreds of engagements that have significant regulatory compliance implications and we have worked with almost all of the top financial institutions yet also routinely assist small and mid-sized institutions.
- We have the right mix of former auditors, banking veterans, regulators and legal professionals to ensure that we bring a full and balanced perspective of views to any engagement.
- Although our work is highly objective and unbiased we pride ourselves on making a difficult process painless and the least disruptive to your day-to-day operations.
- Navigant is routinely engaged with leading regulatory / policy making officials on key matters impacting the financial services industry.
- Navigant has proven methodologies, technology and tools for conducting operational / strategic assessments which can be leveraged to maximize the benefit of any specific review.
- Our senior banking / compliance leaders bring an excellent perspective on industry best practices to continue to help the evolution of your institution.



ENGAGEMENT HIGHLIGHTS

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| LOAN FILE REVIEWS & COMPLIANCE TESTING | <p>For a leading U.S. bank, Navigant was engaged to conduct loan level reviews to assess adherence to various regulatory requirements relating to mortgage loan originations, including ECOA, FCRA, Flood, HMDA, HPA, Privacy, TILA (including QM / ATR), RESPA, and Safe Act. Navigant developed comprehensive audit procedures that address all applicable areas of the regulations, to ensure client compliance with mortgage origination regulations and to identify areas of non-compliance. Loan reviews are currently conducted on an ongoing basis.</p> |
| PROCESS IMPROVEMENT & RISK MANAGEMENT | <p>Navigant has provided continuing assistance for a top non-bank mortgage servicer in reviewing and assessing critical business processes from both an operational and compliance perspective. From an operational perspective, Navigant performed a targeted process reengineering review of high risk areas for the institution. As a result of this review, Navigant developed a Compliance Monitoring System Framework and stood up monitoring processes across the organization to identify issues and assist in remediation activities. Navigant has provided further assistance in staff augmentation, targeted loan level testing, and development of key risk indicators for the institution. Our end-to-end holistic perspective of the organization has allowed Navigant to serve as a trusted advisor and to assist the organization as areas of need arise.</p> |
| COMPLIANCE ANALYTICS & TECHNOLOGY SOLUTIONS | <p>Navigant was engaged by a top U.S. bank to develop Fair Lending regression models for the auto, education finance, consumer credit card and mortgage portfolios. This effort involved implementing a new geocoding process to support the Bayesian Improved Surname Geocoding Proxy method for loans without race, ethnicity, age or gender identifiers. Navigant analyzed the bank's underwriting and pricing policies to develop customized regression models to identify disparate impact within the lending activity. In addition, Navigant assisted in designing a framework that ensures compliance to regulatory requirements pertaining to complaints management. This effort involved creating a text analytics model that mapped regulations to complaints and a system that allowed the bank to benchmark information from the CFPB's Consumer Complaint Database against other peer banks.</p> |