# MMC Examination Timeline

Below is an outline for conducting the multistate examination process, with expectations around the timeline for completing the summarized tasks. It is understood that additional tasks and level of coordination are required for examinations coordinated with the Consumer Financial Protection Bureau (CFPB) and for MMC examinations that simultaneously review both origination and servicing.

* **Prior to 120 days of the on-site examination:**
  + MMC identifies and obtains approval for the target MME to be examined.
  + CSBS staff creates the Examination on Box (MMC Exam Platform) and uploads the on-boarding documents to the MMC Exam Platform.
  + CSBS staff surveys states to determine which state(s) plan to participate in the MMC examination. Survey includes request for the Examiner-in-Charge (EIC) and Single Point of Contact (SPOC).
  + MMC selects the EIC and SPOC for the examination.
  + CSBS staff provides access to MMC Exam Platform for all participating examiners including the SPOC and EIC.
* **Within 120 days of the on-site examination:**
  + CSBS staff and the MMC Chair and/or Vice Chair hold an initial “purpose and mission” conference call with the EIC and SPOC. This includes a discussion of the initial scope of the examination, the anticipated length of examination, and the composition of the Participating States and examination team. Additional bi-weekly check-in calls will be scheduled by CSBS staff.
  + EIC requests the Institution Supervisory Background/Examiner Profile (ISB/EP Form) and electronic signatures authorizing the examination from all Participating States. When completing the ISB/EP Form, States must indicate their participating examiner(s), if they plan to go on-site, and if they have any additional information requests beyond the standard Information Request. Participating States must submit the completed ISB/EP Form to the EIC who will upload it to the MMC Exam Platform.
  + EIC begins review of all applicable databases and information in preparation for the multistate examination. Examples of databases include but are not limited to: NMLS; CFPB Complaint Portal, SAR data, FTC Consumer Sentinel database; FFIEC-LAR Data; HUD Neighborhood Watch; MME website; Internet search engines, social media; or individual state database.
* **Within 100 days of the on-site examination:**
  + EIC and SPOC conduct an initial conference call with the MME to cover all known information and a summary of the following:
    - Multistate examination purpose and process and the expected lines of communication.
    - Examination start date and expected length of examination.
    - List of Participating States represented on the multistate examination.
    - Reiterate the protocol, as instructed in the Information Request, for future communication with the multistate examination team.
    - What information should be sent to the EIC vs. directly to the Participating States.
    - On-site requirements (space needed; access to key contacts; access to files, policies and procedures).
    - Obtain information relating to convenient hotels and other travel requirements.
    - Advise MME of the contents of the Exam Notification Letter and Information Request.
    - Confirm secure delivery of data related to information requests
  + EIC reviews the ISB/EP Forms submitted by the Participating States. EIC reviews state specific requests and consolidates for duplicate requests.
  + EIC prepares the Exam Notification Letter and Information Request. The templates for these documents are included within the on-boarding documents on the MMC Exam Platform. Any state specific information requests should be identified by the Participating States on the ISB/EP Forms.
  + EIC begins the Examination Plan. The template for the Examination Plan is included within the on-boarding documents on the MMC Exam Platform. The examination scope must be identified. EIC creates sub-committee assignments which are identified within the Examination Plan.
  + EIC utilizes the ISB/EP Forms to complete the examination team roster and examiner assignments within the Examination Plan.
  + EIC finalizes the Examination Notification Letter and the Information Request document by adding signatures, due dates, and state specific requests. The SPOC should review the Examination Notification Letter and the Information Request before they are sent to the MME.
  + EIC emails the Examination Notification Letter and the Information Request (including any state-specific requests) to the Participating States and MMC.
* **Within 90 days of the on-site examination:**
  + EIC sends the Exam Notification Letter and Information Request to the MME 90 days prior to the on-site start date. The Information Request includes a request for the loan lists of each Participating State. The MME’s due date for completing the Information Request should be 30 days from the date the EIC sent the Exam Notification Letter and Information Request to MME being examined.
* **Within 80 days of the on-site examination:**
  + EIC schedules a follow-up conference call with the MME and SPOC within 10 days of sending the Exam Notification Letter and Information Request to discuss the following:
    - EIC to answer any questions regarding the Information Request.
    - EIC to remind MME of upcoming due dates for request items including RegulatorConnect uploads (where applicable) and Loan Logs.
  + If necessary, EIC will email the Participating States a summary of issues identified on the conference call.
* **Within 60 days of the on-site examination:**
  + EIC emails the Exam Plan to the examiners from the Participating States 60 days prior to the on-site start date.
  + EIC ensures that the MME has provided its Information Request (including loan lists for Participating States) by the deadline.
  + EIC uploads the MME’s Information Request to the MMC Exam Platform and notifies the Participating States that it is available for review. This also includes the loan lists for each Participating State.
  + RegulatorConnect data to be uploaded to *ComplianceAnalyzer*® and applicable reports should be reviewed within ComplianceEase by the Participating States.
  + EIC directs the Participating States to make their loan selection from the lists provided by the MME. The loan selections will be due from the Participating States within 15 days of receipt from the MME. If a Participating State does not respond or provide its loan selection within the due date, the EIC should notify the SPOC.
* **Within 45 days of the on-site examination:**
  + EIC and SPOC schedule a conference call with examiners from the Participating States. Discussion items include, but are not limited to:
    - Confirm dates of on-site portion of the examination.
    - EIC to discuss strategy for on-site and off-site portions of the examination.
    - EIC to discuss examination logistical requirements.
    - EIC to discuss summary of issues and listen to feedback from states.
    - Review examiner sub-committee assignments.
  + EIC will forward the loan file selections to the MME 45 days prior to the on-site start date with a deadline of the loan files being due at least 15 days prior to the on-site start date. Instruct the MME to securely transfer the selected loan files to each Participating State via the MMC Exam Platform.
  + EIC will review the Information Request to ensure it is complete and all Participating States have received the information from the MME.
* **Within 30 days of the on-site examination:**
  + EIC finalizes the Exam Plan, which must be uploaded to the MMC Exam Platform. The EIC notifies the SPOC that the Exam Plan is complete. EIC and/or SPOC notify the MMC and Participating States within 30-days of the on-site start date that the Exam Plan is available for review.
  + EIC works with the MME and Participating States on ongoing issues and concerns, updates, and delays.
  + EIC schedules a conference call with examiners from the Participating States (if needed).
  + Examiners with subcommittee assignments begin reviewing the related materials provided in the Information Request.
  + EIC inventories state-specific and general examination request items.
  + EIC contacts MME for any missing documentation.
  + EIC schedules a conference call with the SPOC (if needed).
  + EIC schedules a conference call with examiners from the Participating States to discuss any updates, delays or concerns (if needed).
  + EIC prepares the schedule for the on-site examination.
  + EIC sends the draft on-site schedule to the examiners from the Participating States. The examiners should ensure that they request any meetings with key staff for questions related to their sub-committee assignments. The Participating States will have five (5) days to review and send any edits/comments to the EIC.
* **Within 15 days of the on-site examination:**
  + EIC sends the on-site schedule to the MME.
  + EIC distributes all information received from the MME to the Participating States. The MME should provide copies of the loan files directly to the Participating States at least 15-days prior to the on-site start date.
  + Each week (if needed) the EIC and SPOC should have a conference call with the Participating States.
  + EIC reviews and organizes the received request items in preparation for the on-site portion of the examination. The Participating States should begin reviewing the information received from the MME.
  + EIC contacts the MME for any clarification on request items.
  + EIC provides states with any additional requested items received from the MME.
* **Within 7 days of the on-site examination:**
  + Each state should have received the selected loan files from the MME. The EIC and Participating States should begin reviewing their selected loan files ahead of the on-site examination. Examiners should formulate their follow-up information requests in response to their loan file review prior to the on-site examination. Additionally, examiners should review material related to their sub-committee assignment.
  + The EIC and SPOC should have a conference call with the Participating States and the MME finalizing the logistics for the on-site examination. This call should be scheduled at least seven days prior to the on-site examination.

## On-Site Examination

* Examination begins.
* Upon arrival at the MME, the EIC:
  + Confirms that the examiners have access to work stations, copy machines, printers, telephones, and examination records.
  + Meets with the examination team to review the scope, meeting schedule, and expectations for the week.
  + Meets with designated MME contact and confirms all outstanding request items are available for review.
  + EIC and examiners get a tour of the MME.
  + EIC determines the MME’s key contacts and the responsibilities of each contact. The EIC should discuss with the MME and the examiners the protocols for access to the key contacts during the on-site week.
* EIC to brief SPOC on status of examination.
* EIC should have daily meetings with the Participating States (both on-site and off-site) to discuss any findings, issues, outstanding requests, possible meetings with MME, etc.
* EIC and Participating States meet with members of management and key MME staff.
* Last day on-site:
  + EIC should have a meeting with Participating States to determine outstanding requests and the procedures for the remainder of the examination.
  + EIC should have a meeting with the MME to discuss the outstanding items and the events that will occur the next few weeks. This will be a preliminary exit meeting.
  + EIC to update SPOC. The MMC will be updated by the SPOC and check in-calls held with CSBS staff.

## Post On-site Examination

* **Immediately following the on-site examination:**
  + The EIC begins preparing the MMC Report of Examination (ROE).
  + The Participating States write their examination findings and complete any subcommittee assignments.
* **Within 21 days after the on-site examination:**
  + The Participating States submit their examination findings and subcommittee assignments to the EIC.
* **Within 30 days after the on-site examination:**
  + The EIC must notify the SPOC if any Participating State has not submitted their findings or subcommittee assignments. The SPOC will work with the EIC to follow-up with the relevant Participating State(s).
  + The EIC incorporates the findings and subcommittee assignments from the Participating States into the draft ROE.
  + EIC continues drafting and editing the ROE.
* **Within 45 days of the on-site examination:**
  + The SPOC must notify the MMC if any Participating State has not submitted their findings or subcommittee assignments. The MMC will reach out to the main mortgage contact for the relevant Participating State(s).
* **Within 60 days of the on-site examination:**
  + The EIC must have an initial draft of the ROE.
  + The EIC will notify the SPOC that the initial draft ROE is ready for review.
  + The SPOC will review and edit the ROE.
  + SPOC must notify the MMC if a draft of the ROE is not complete.
* **Within 70 days of the on-site examination:**
  + The EIC will notify the Participating States that the draft ROE is available for review. The Participating States will have five days to review and edit the ROE.
* **Within 75 days of the on-site examination:**
  + The EIC will review any suggested edits made by the Participating States.
  + The EIC will send the ROE to the SPOC for final review. The SPOC will have five days for final review of the ROE.
  + The EIC or SPOC must share a copy of the draft ROE with the CFPB for any MMC examinations coordinated with the CFPB.
* **Within 80 days of the on-site examination:**
  + The SPOC notifies the MMC that the ROE is ready for review. *(The MMC Chair must contact the SPOC if the ROE is not ready to be reviewed.)*
* **Within 90 days of the on-site examination:**
  + The MMC reviews and approves the ROE.
  + The MMC Chair notifies the EIC and SPOC that the ROE has been approved. If applicable, the EIC will review and implement suggested edits from the MMC.
* **Once the MMC has approved the ROE:**
  + The EIC finalizes the ROE and sends it to the MME. The EIC must upload these final documents to the MMC Exam Platform.
  + The ROE Cover Letter will state that the MME has 30 days to provide its written response. *(MMC Policy is to provide one 30-day extension to the MME if requested.)*
  + Once the MME has provided the written response to the ROE the EIC will notify the Participating States that the response is ready to be reviewed and will upload the MME’s response to the MMC Exam Platform. The EIC will solicit responses from the Participating States as to whether they accept or reject the response from the MME. The EIC must also survey the Participating States as to whether there is a desire to create an enforcement referral. It is recommended that the EIC request that the Participating States complete their review of the MME’s response within 10 days.
  + The EIC or SPOC must notify the MMC that the examination is ready to be closed. At this time there should be discussion between the EIC, SPOC, and the MMC to review any responses from Participating States that desire to move the examination to enforcement. If applicable, the EIC and SPOC will work with the MMC in the preparation of the enforcement referral. The MMC will submit the enforcement referral.
  + The EIC will prepare the Closing Letter that will be shared with the SPOC and Participating States.
  + The EIC will send the Closing Letter to the MME. If an enforcement referral will be made it must be noted within this Closing Letter.
  + The EIC will remind the Participating States that they may provide separate examination billings to the MME and that examiners should record their time on the examination on the MMC Exam Platform
  + The EIC should complete any remaining milestones listed on the MMC Exam Platform.