



T H I S I S

COMPLIANCE

THIS IS TSI

COMMITMENT TO COMPLIANCE

TSI's compliance controls, technology, expertise and management minimizes legal, regulatory, and reputational risk for our clients and protects consumers. TSI's complaint rate of .017% per contact protects your brand from costly regulatory violations and retain your hard-earned customer relationships.



REGULATED BY THE CFPB

The Consumer Financial Protections Bureau exercises responsibility for supervision and enforcement of consumer protection laws while also regulating providers of consumer financial products and services.



BEST-IN-CLASS CMS

We're constantly updating our Compliance Management System (CMS) to ensure that CFPB and Federal Reserve compliance and risk management standards are woven into the fabric of our operations in order to minimize the potential for FDCPA, TCPA, UDAP, and other regulatory violations.



EVOLVING COMPLIANCE CONTROLS

Our CMS is comprised of a number of automated controls dictated by policies & procedures that determine and assign recovery strategies to accounts that comply with federal, state, and local consumer laws and regulations.

COMPLIANCE STANDARDS & CONTROLS

We've integrated Consumer Financial Protection Bureau (CFPB) and Federal Reserve Compliance & Risk Management Standards into every facet of our organization.



FISMA

Due to our Authorization to Operate (ATO) from the US Government, we are a fully FISMA compliant service provider.



NIST

We utilize these proven, government approved security controls and encryption standards in all IT systems that process, store, and transmit confidential data.



PCI-DSS

We're a certified Payment Card Industry Data Security Standard (PCI-DSS) compliant service provider, meaning our controls are designed to guarantee that all payment information is accepted, processed, and stored in a secure ecosystem.



HIPAA

The Health Insurance Portability & Accountability Act (HIPAA) established the HIPAA Privacy & Security Rules, which are standards and controls established to ensure the protection of health information in analog and digital formats.

WHAT TO CONSIDER WHEN SELECTING DEBT COLLECTION VENDORS

The CFPB will hold you accountable for the actions of your third-party service providers. Here's a checklist of items to keep in mind when evaluating your vendors:

FULLY-INTEGRATED COMPLIANCE MANAGEMENT SYSTEM

Your vendors should have a Compliance Management System (CMS) in place that is woven into every fiber of their operations capable of minimizing risk and preventing violations of federal and state consumer protection laws.

COSTLY UDAAP VIOLATIONS

What policies and procedures do your vendors employ in order to ensure avoidance of UDAAP (Unfair, Deceptive, or Abusive Acts & Practices) and other risks to consumers?

PROPER COMPLIANCE GOVERNANCE

Every vendor you utilize should have sufficient board oversight, policies & procedures, compliance training, complaint resolution, and compliance monitoring all being governed by an independent Board Compliance Committee.

CFPB RULEMAKING & INDUSTRY CONSOLIDATION

THE CFPB'S RECENTLY PUBLISHED *OUTLINE OF PROPOSALS* GOVERNING DEBT COLLECTORS WILL IMPOSE STRINGENT NEW REGULATIONS THAT WILL DRIVE A MASS-CONSOLIDATION WITHIN THE COLLECTIONS INDUSTRY.

DUE TO OUR CONTINUED INVESTMENT IN COMPLIANCE MANAGEMENT, TSI WILL BE ONE OF THE DRIVERS OF THIS CONSOLIDATION.

- **COLLECT THE CORRECT DEBT:** collectors would need to scrub their files and substantiate the debt before contacting the consumer.
- **LIMIT EXCESSIVE OR DISRUPTIVE COMMUNICATIONS:** collectors would be limited to six communication attempts per week.
- **MAKE DEBT DETAILS CLEAR & DISPUTES EASY:** collections would be required to include more specific information about the debt in the initial collection notice. Collectors would also need to include a tear-off portion to the notice that consumers can send back in order to easily the debt or make a payment.
- **DOCUMENT DEBT ON DEMAND FOR DISPUTES:** if the debt is disputed, the collector would need to provide a debt report - written information substantiating the debt - back to the consumer. The collector could not continue to pursue the debt until that report and verification is sent.
- **STOP COLLECTING OR SUING FOR DEBT WITHOUT PROPER DOCUMENTATION:** Collecting on debt without sufficient evidence would be prohibited. Collectors are required to check documentation of a debt before pursuing action in court.
- **STOP BURYING THE DISPUTE:** If debt collectors transfer debt without responding to disputes, the next collector could not try to collect until the dispute is resolved. Collectors would also need to send specific information when they transfer debt to another collector or to the originator.

COMPLIANCE MANAGEMENT SYSTEM

Our Compliance Management System (CMS) is built on four key pillars and overseen via a robust governance structure.



BOARD OF DIRECTORS

Oversees the effectiveness of our CMS, promotes a culture of compliance, and sets clear compliance expectations.



COMPLIANCE PROGRAM

Prevents and reduces regulatory violations, protects consumers, and decreases risk of litigation.



CONSUMER COMPLAINT MANAGEMENT

Investigates consumer complaints, performs root-cause analysis, determines any merit, and improves systems, policies, and procedures.



CALL QUALITY MONITORING

Routinely monitors and scores agent-debtor interactions, tracks agent acknowledgements, and requires supervisor-agent coaching.



COMPLIANCE AUDIT

Assesses each business unit's compliance with consumer protection laws, internal policies and procedures, and client requirements.



THIS IS TSI

INDEPENDENT COMPLIANCE & AUDIT

Our broad regulatory compliance and audit oversight touches our employees, how they interact with consumers, how we monitor and assess those interactions, and how we secure and protect both client and consumer data.

