

Best Practices Guarantee



Mid-American Title Co
a title insurance agency

522 E 8th Street, Traverse City, MI 49686
231-929-1235





On April 13th, 2012 the Consumer Financial Protection Bureau ("CFPB") issued CFPB Bulletin 2012-03. The bulletin is far reaching and places an unprecedented amount of liability on lending institutions for the actions of their service providers. Below is a summarized excerpt from CFPB Bulletin 2012-03:

The CFPB expects Supervised Banks ("Banks") to oversee their business relationships with service providers in a manner that ensures compliance with federal consumer financial law, which is designed to protect the interest of consumers and avoid consumer harm.

The CFPB expects Banks to have an effective process for managing the risks of service provider relationships.

To limit the potential for statutory or regulatory violations and related consumer harm, Banks would take steps to ensure that their business arrangements with service providers do not present unwarranted risks to consumers. These steps would include, but are not limited to:

Conducting thorough due diligence to verify that the service provider understands and is capable of complying with Federal consumer financial law;

Requesting and reviewing the service provider's policies, procedures, internal controls, and training materials to ensure that the service provider conducts appropriate training and oversight of employees or agents that have consumer contact or compliance responsibilities;

Establishing internal controls and on-going monitoring to determine whether the service provider is complying with Federal consumer financial law; and

Taking prompt action to address fully any problems identified through the monitoring process, including terminating the relationship where appropriate.

For more visit
<http://www.consumerfinance.gov>

As a valued business partner and service provider to your lending institution, we would like to put your mind at ease with our Best Practices Guarantee

On January 2, 2013, the American Land Title Association ("ALTA") issued a list of "Best Practices" for title companies. Following these best practices helps lending institutions become confident that their title service provider is adhering to federal consumer law and minimizing legal risk to your institution posed by CFPB 2012-03. Below is a list of ALTA's best practices along with what Mid-American Title Co. has already implemented to put your mind at ease:



Establish and maintain current license(s) as required to conduct the business of title insurance and settlement services.



Mid-American Title Co. maintains state title insurance licenses

Mid-American Title Co. is also a member of the American Land Title Association ("ALTA") and is licensed to use ALTA promulgated forms.

Adopt and maintain appropriate written procedures and controls for Escrow Trust Accounts allowing for electronic verification of reconciliation.



Mid-American Title Co. maintains regular reconciliations on all escrow trust accounts. Which are completed by an independent third party accounting firm.

All escrow trust accounts are maintained at Federally Insured financial institutions.

Adopt and maintain a written privacy and information security program to protect Non-public Personal Information as required by local, state and federal law.



Mid-American Title Co. restricts access to Non-public personal information to authorized internal associates who have undergone a Background and Credit check.

Mid-American Title Co. maintains a disaster management and preparedness plan to ensure business continuity for your customers regardless of the situation.

Adopt standard real estate settlement procedures and policies that ensure compliance with Federal and State Consumer Financial Laws as applicable.



Throughout the year a representative sample of closed files goes to a post-closing review
Mid-American Title maintains a recording Log to monitor all recordings

Adopt and maintain written procedures related to title policy production, delivery, reporting and premium remittance.



Through our advanced reporting and tracking, Mid-American Title Co. ensures that title policies are prepared within thirty days of settlement when terms and conditions are satisfied.

Maintain appropriate professional liability insurance.



Mid-American Title Co. maintains Errors and Omissions Insurance, and Cyber Insurance
We know it is important to protect your customers.

Adopt and maintain procedures for resolving consumer complaints.



Mid-American Title Co. promptly addresses and tracks all customer inquiries.

