ReversePilot

Compliance Questionnaire

LOAN ORIGINATION SYSTEM --- COMPLIANCE ASSESSMENT

PREPARED BY **ReversePilot** DATE **April 2026**

Contents

1 Company Overview

ReversePilot is committed to full regulatory compliance across all aspects of our loan origination platform. We maintain rigorous controls to meet federal, state, and agency-specific requirements.

Compliance-First Platform

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2 Regulatory Framework Coverage

Q1 Which U.S. federal and state mortgage regulations does the LOS explicitly support?

ReversePilot supports compliance with the following federal regulations through built-in system controls and features:

Regulation	System Controls
TILA / Regulation Z	HECM TIL disclosures (application & closing), APR calculations, TALC calculations (12 CFR 1026.24), 3-business-day rescission period computation
RESPA / Regulation X	GFE generation with tolerance bucket calculations per Reg X commentary, fee disclosure tracking, settlement service provider list generation
HMDA	LAR file generation (pipe-delimited & CSV), ULI generation/validation via FFIEC APIs, census tract lookup, demographic data collection
HUD/FHA/HECM (24 CFR 206)	FHA Connection integration, PLF table validation, age eligibility enforcement (62+), counseling tracking, NBS/NBO handling, repair set-aside limits
SAFE Act / NMLS	Per-state license tracking with expiration enforcement, NMLS ID management, NMLS Consumer Access printout generation
GLBA / Privacy	PII stripping on API responses with FCRA/GLBA/CCPA citations, role-based data access, cross-tenant data isolation
OFAC / BSA	Automated SDN screening with PDF printouts and S3 archival, SAM.gov exclusions screening, HUD LDP list screening
State-Specific	State-scoped fee templates, dynamic disclosure activation logic, state-specific instruments/notes, licensing enforcement gates

Q2 How does the system stay current with regulatory changes (e.g., rule updates, interpretive guidance)?

ReversePilot stays current with regulatory changes through a combination of approaches:

- **Configurable rule parameters**: Key regulatory parameters such as PLF tables, fee templates, tolerance thresholds, document activation rules, and status transition requirements are data-driven and configurable per company without code changes.
- **Regular software releases**: The development team monitors regulatory changes and implements updates through the standard CI/CD pipeline. Changes are tested via automated test suites and formatting validation before deployment.
- **External API integration**: The system integrates with live regulatory APIs (FFIEC for ULI/census tract, FHA Connection for case numbers and insurance, NMLS Consumer Access) to ensure current data without manual updates.
- **PLF table versioning**: PLF lookup tables are stored as versioned data files and can be updated independently; a management command provides integrity verification.

Q3 Is there a formal regulatory change management process?

Yes. System changes follow a structured development lifecycle:

- All code changes go through pull requests; direct merges to protected branches are prohibited.
- CI/CD checks enforce automated testing and code formatting on every PR.
- Deployments progress through dev, beta, and prod environments with separate deployment workflows.
- Pre-commit hooks enforce formatting standards locally before code reaches CI.
- Compliance-relevant changes are tracked via the AuditLog system with compliance-relevant flags.

Q4 Are regulatory requirements mapped to system controls or functionality?

Yes. Regulatory requirements are mapped to system controls at multiple levels:

- **Document package requirements**: Admin-configurable JSON rules map required fields, documents, and status prerequisites to document generation milestones.
- **Status transition requirements**: Per-company rules enforce required data fields for each pipeline status transition.
- **Condition tracking**: Conditions are categorized as General, Prior to Docs, Prior to Closing, and Prior to Funding, directly mapping to regulatory milestone gates.
- **Fee tolerance mapping**: Fees are assigned TRID tolerance categories (0%, 10%, Unlimited) based on HUD line numbers, with automated enforcement via the Disclosure API.
- **Permission system**: 60+ granular permissions mapped to regulatory functions (e.g., HMDA reporting, investor tape builder, credit report access).

Q5 Provide documentation demonstrating how regulatory requirements are translated into system logic.

Documentation mapping regulatory requirements to system logic includes:

- Compliance guides for HMDA, MCR reporting, licensing management, and signature handling.
- Pre-closing compliance checklist mapping HUD 4000.1, TILA, RESPA, HMDA, and state requirements to system verification steps.
- Code-level regulatory references: GFE generation code includes inline Reg X commentary citations; TALC calculations reference 12 CFR 1026.24; repair set-asides reference HUD documentation; PLF calculations reference HUD HECM calculator alignment.
- HUD field mapping service maps system fields to HUD's online HECM calculator inputs/outputs for verification.
- HUD model loan documents stored for reference against system-generated documents.

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3 TILA-RESPA Integrated Disclosure Compliance

Reverse mortgages (HECMs) are exempt from the TILA-RESPA Integrated Disclosure (TRID) rule. Instead of the Loan Estimate and Closing Disclosure required for forward mortgages, HECMs use the traditional GFE and HUD-1 Settlement Statement disclosure framework. ReversePilot fully supports these HECM-specific disclosures. This information is not legal advice – consult with qualified legal counsel regarding your specific compliance obligations.

ReversePilot generates HECM-specific disclosure documents under the GFE/HUD-1 framework, with automated tolerance enforcement, rescission period calculation, and full disclosure versioning.

Q1 How does the LOS ensure accurate generation of Loan Estimates (LE) and Closing Disclosures (CD)?

ReversePilot generates HECM-specific disclosure documents that serve the regulatory function of Loan Estimates and Closing Disclosures:

- **Good Faith Estimate (GFE)**: Generated from fee data with regulatory tolerance bucket separation (0%, 10%, Unlimited) per Reg X. The GFE builder includes inline CFPB regulatory citations for each fee block.
- **HECM Truth in Lending (TIL) disclosures**: Separate Application and Closing variants generated with APR, TALC calculations, and finance charge itemization.
- **HUD-1 Calculation Worksheet**: Settlement statement generation with line-item fee mapping.
- **Comparison page**: Side-by-side loan product comparison documents.
- **Accuracy controls**: Fee data is sourced from the Fee model with HUD line number constraints (unique per loan), amounts flow through calculation engines, and document generation validates required fields before producing PDFs.

Q2 What controls ensure adherence to timing requirements under TILA-RESPA Integrated Disclosure Rule?

The system supports timing compliance through:

- **Rescission period calculation**: Computes the 3-business-day TILA rescission period, accounting for holidays and weekends.
- **Disclosure date tracking**: The Disclosure model records the creation timestamp of each fee disclosure snapshot, and the ClosingSettlement model tracks application date, closing date, redisclosure date, and funding date.
- **Document generation timestamps**: Each generated document package creates a DocumentHistory record with timestamp and unique serial number.
- **Status transition enforcement**: Pipeline status transitions (e.g., to Clear to Close or Closing) can be gated by requirements mandating specific dates and fields be populated.

Q3 How are tolerance thresholds calculated and enforced?

Tolerance enforcement is implemented through the Disclosure API. Each fee is classified by HUD line number into one of three tolerance categories:

Category	Threshold	HUD Lines	Enforcement
0%	Exact match	801, 805	Auto-flag; warning at 80%, block at 100%
10%	Section total	800–999, 1100–1299	Warning at 80%, block at 100%
Unlimited	No cap	All others	Monitored, no block

The system compares disclosed fee totals against current amounts grouped by tolerance bucket. When out-of-tolerance conditions are detected, automated tolerance cures calculate the overage and create or update a lender credit (HUD line 802) to bring the loan into compliance, with full audit logging.

Q4 How does the system handle redisclosure triggers?

Redisclosure is supported through:

- **Changed Circumstance (VCC) tracking**: The DocumentHistory model includes VCC reason choices (settlement costs changed, requested loan changed, borrower-requested, lender-required TIL) that are recorded when redisclosure packages are generated.
- **Redisclosure date tracking**: The ClosingSettlement records when a redisclosure occurs.
- **Disclosure versioning**: Each Disclosure record is a point-in-time fee snapshot; the latest is always compared against current fees. Multiple disclosures for the same loan create a historical chain.
- **Staleness detection**: DocumentHistory tracks data revision at generation against the loan's current data revision to identify when generated documents are stale.

Q5 Are disclosure versions tracked and archived?

Yes. Disclosures are versioned and archived at two levels:

- **Fee disclosure snapshots**: Each Disclosure record stores a JSON copy of all fee data at the time of disclosure, linked to the loan and creating user with a timestamp. Prior disclosures are preserved (not overwritten).
- **Generated document packages**: Each PDF generation creates a new DocumentHistory row with a unique serial number, S3 URL, loan snapshot (data state at generation), timestamp, and optional VCC metadata. The system also tracks when documents become stale.
- **Model history**: Both Disclosure and DocumentHistory models include full field-level change tracking of all modifications.

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4 RESPA Compliance

Fee disclosures, tolerance enforcement, affiliated business arrangement tracking, and settlement service provider management ensure end-to-end RESPA compliance.

Q1 How does the LOS support compliance with Real Estate Settlement Procedures Act?

ReversePilot supports RESPA compliance through:

- **GFE generation**: Fee disclosures organized by RESPA tolerance blocks (zero-tolerance originator charges, 10%-tolerance originator-selected services, and unlimited-tolerance borrower-selected services), with inline Reg X regulatory citations.
- **HUD-1 Calculation Worksheet**: Settlement statement generation with HUD line-item fee mapping.
- **Fee tolerance enforcement**: Automated comparison of disclosed vs. actual fees with cure mechanisms.
- **Settlement service provider tracking**: Settlement agent information is captured with affiliation flags, feeding into the Settlement Service Provider List document.
- **Disclosure timing**: Application, closing, redisclosure, and funding dates are tracked.

Q2 Are fee disclosures and settlement service provider relationships properly captured?

Yes:

- **Fee disclosures**: The Disclosure model stores point-in-time JSON snapshots of all loan fees. The Fee model captures HUD line number, tolerance category, payee, amount, finance charge status, and borrower-shoppable flags.
- **Settlement service providers**: The SettlementAgent model stores provider details per company with an affiliated boolean flag. The Settlement Service Provider List document is generated from active, affiliated settlement agents.
- **Provider on loan**: Each loan links a specific settlement agent via the ClosingSettlement record.

Q3 How does the system track affiliated business arrangements (AfBAs)?

Affiliated business arrangements are tracked through:

- Each settlement agent record includes an affiliation indicator.
- The Affiliated Business Arrangement Disclosure document template generates the required disclosure with property, borrower, lender, and NMLS information.
- Only agents marked as affiliated and active are included in the generated provider list.
- The system includes dedicated document folders for Affiliated Business Arrangement Disclosure and Settlement Service Provider List for organization.

Q4 What controls exist to prevent impermissible fee splitting or kickbacks?

Controls supporting RESPA Section 8 compliance include:

- **Fee transparency**: All fees are tracked with HUD line numbers, payee identification, and tolerance categories, creating an auditable fee structure.
- **Tolerance enforcement**: Automated tolerance threshold monitoring flags unexpected fee increases that could indicate impermissible charges.
- **Audit trail**: Fee changes are tracked through model history, and the AuditLog captures compliance-relevant events.
- **Permission controls**: Fee creation and modification are governed by role-based permissions.

Q5 How are servicing transfer disclosures handled?

The system generates a Notice of Servicing Transfer document that includes effective date computed as closing date plus 15 days, current and new servicer identification, investor information, and company address blocks. Servicing transfer data is also supported through integration fields in the Celink boarding specification (servicer details, endorsement dates) and investor tape exports.

5 HMDA Reporting & Data Integrity

Automated ULI generation, FFIEC geocoding integration, demographic data collection, and LAR file export in both pipe-delimited and CSV formats support full HMDA reporting compliance.

Q1 How does the LOS capture and validate data required under Home Mortgage Disclosure Act?

HMDA data is captured throughout the loan lifecycle:

- **Borrower demographics**: Race, ethnicity, and sex are collected via dedicated models with mapping functions that translate stored values to HMDA codes.
- **Property/geographic data**: Census tract is populated via FFIEC's geocoding API from property address, with state and county FIPS codes stored.
- **Universal Loan Identifier (ULI)**: Automatically generated on loan creation using the company's LEI and validated via FFIEC's public API. ULI is regenerated if validation fails.
- **Loan data**: Application date, action taken, loan amount, loan type (HECM = type 2), loan purpose (reverse mortgage = 32), and other required fields are captured from loan and product models.
- **Validation API**: A per-loan checklist shows ULI presence and census tract status, enabling users to identify and fix incomplete records before filing.

Q2 Are edits (syntactical and validity) automatically enforced?

The system performs targeted data validation:

- **ULI validation**: Check digit validation via the FFIEC public API is enforced on loan save; invalid ULIs are automatically regenerated.
- **Year parameter validation**: The HMDA reporting endpoint validates the reporting year parameter.
- **Census tract presence**: The system warns when a loan has no census tract at export time via logging.
- Full CFPB syntactical and validity edit checks (as defined in the HMDA Filing Instructions Guide) are performed externally when the LAR file is uploaded to the CFPB HMDA Platform.

Q3 How are HMDA data fields audited for completeness and accuracy?

HMDA data completeness is audited through:

- **Validation endpoint**: The HMDA reporting endpoint checks each loan for ULI and census tract completeness, surfacing loans that need attention.
- **Operational logging**: The export process logs warnings for loans missing census tract data.
- **Model history**: All loan and borrower field changes are tracked, enabling audit of when HMDA-relevant fields were entered or modified.
- **Bulk data preparation tools**: Endpoints to bulk-generate ULIs for loans missing them and to bulk-generate census tracts via async processing.

Q4 Can the system produce a Loan/Application Register (LAR) in the required format?

Yes. The system produces LAR files in two formats:

- **Pipe-delimited LAR (.txt)**: A file with a header line (record type 1, company name, year, contact info, loan count, EIN, LEI) followed by one data line per loan, formatted per CFPB specifications. Fields include ULI, application date, loan type, loan purpose, action taken, property address, census tract, borrower demographics, income, and other required data points.
- **CSV format**: A CSV file with standard HMDA columns for review and analysis.

Both formats are gated by reporting permissions.

Q5 How are corrections or resubmissions handled?

Corrections are handled through a data-fix-and-regenerate workflow:

- Users review validation results from the HMDA reporting endpoint to identify incomplete or incorrect loans.
- Loan, borrower, property, and census tract data is corrected in the system.
- A new LAR file is generated via the export endpoint, incorporating the corrected data.
- The corrected file is uploaded to the CFPB HMDA Platform for resubmission.

All data changes are tracked through model history for audit purposes.

6 Fair Lending & UDAAP

Q1 What controls exist to monitor and prevent discrimination under fair lending laws?

ReversePilot supports fair lending compliance through:

- **HMDA data collection and reporting**: Demographic data (race, ethnicity, sex) is collected for all applicants, enabling fair lending analysis and regulatory reporting.
- **Standardized calculations**: HECM principal limit, eligibility, and fee calculations are formula-driven using HUD-published PLF tables and regulatory parameters, removing subjective decision-making from core loan math.
- **Audit trail**: All loan actions, status changes, and data modifications are tracked through AuditLog and model history, enabling pattern analysis for fair lending reviews.
- **Permission-based access**: Granular role-based permissions ensure consistent application of policies across users.

Q2 How does the system support compliance with Equal Credit Opportunity Act?

ECOA compliance is supported through:

- **Demographic data handling**: Borrower demographic information is collected for HMDA purposes but is not used in underwriting or pricing calculations.
- **Reason for denial tracking**: Denial reasons are captured with standardized codes mapped to HMDA action-taken categories.
- **Consistent processing**: Automated calculations and configurable status transition requirements ensure loans are processed consistently.
- **Historical records**: All loan status changes, including denials, are logged with timestamps, user attribution, and notes.

Q3 Are adverse action notices generated automatically and accurately?

The system tracks denial reasons and maps them to standardized codes for HMDA reporting. Denial reasons are captured through multiple fields supporting up to four reason codes. Adverse action notice document generation can be configured through the document package system. Status changes to denied/withdrawn states are logged with user attribution and notes.

Q4 How are underwriting or pricing decisions documented for auditability?

Underwriting and pricing decisions are documented through multiple mechanisms:

- **Calculation engine**: All HECM calculations (principal limit, PLF lookup, closing costs, set-asides, available proceeds) are performed with deterministic, auditable logic.
- **Calculation explanations**: The system generates human-readable explanations of how key values (PLF, NBS age adjustments, principal limit) were derived.
- **Financial Assessment**: Residual income, credit history, property charge history, and overall assessment results are captured with narratives.
- **Model history**: Every field change on loan, borrower, property, and fee models is tracked with timestamps and user attribution.
- **AuditLog**: Compliance-relevant events are logged, including status changes, document generation, and credit pulls.

Q5 What safeguards exist against unfair, deceptive, or abusive acts or practices (UDAAP)?

UDAAP safeguards include:

- **Standardized disclosures**: System-generated documents (GFE, TIL, HUD worksheets) use HUD model language and regulatory templates, ensuring consistent and accurate borrower communications.
- **Fee transparency**: All fees are itemized with HUD line numbers, tolerance categories, and payee identification; tolerance enforcement prevents undisclosed fee increases.
- **Calculation consistency**: Automated HECM calculations prevent manual manipulation of principal limits, closing costs, or available proceeds.
- **Audit trail**: Immutable AuditLog records with user attribution, impersonation tracking, and compli-

ance flags provide full accountability for all system actions.

- **Role-based controls**: Granular permissions prevent unauthorized access to sensitive functions.

7 FHA / HUD / HECM-Specific Compliance

Purpose-built for HECM origination, ReversePilot implements HUD 4000.1 and 24 CFR Part 206 requirements with direct FHA Connection integration, PLF table validation, and comprehensive NBS/NBO handling.

Q1 How does the LOS ensure compliance with U.S. Department of Housing and Urban Development guidelines (e.g., HUD 4000.1)?

ReversePilot ensures HUD compliance through:

- **HECM calculation engine**: Implements PLF lookup, principal limit calculation, closing cost aggregation, IMIP computation, repair set-aside limits (capped at 15% of max claim per HUD guidelines), LESA (Life Expectancy Set-Aside), and available proceeds calculation aligned with HUD's online HECM calculator.
- **HUD field mapping service**: Maps system fields to HUD calculator inputs/outputs for developer and QA verification.
- **FHA Connection integration**: Direct API integration with HUD for case number assignment, HECM insurance applications, financial assessment submission, appraisal logging, and other FHA Connection functions.
- **Document templates**: System generates HUD-compliant documents including HUD-1 Calculation Worksheet, GFE, TIL disclosures, loan agreements, notes, security instruments, and borrower certifications, with templates aligned to HUD model loan documents.
- **HECM product disclosure compliance**: Configurable per-company setting ensures all three HECM product types (fixed, monthly ARM, annual ARM) are disclosed.
- **Pre-closing compliance checks**: Detailed checklist maps HUD 4000.1 requirements to system verification steps.

Q2 Are FHA case numbers and endorsements properly tracked?

Yes:

- **Case number model**: Stores FHA case number, loan type (HECM Traditional, HECM to HECM, HECM for Purchase), previous FHA case number, prior IMIP paid, prior max claim amount, principal limit, and related fields.

- **FHA Connection case number assignment**: The system submits case number assignment requests directly to HUD via XML API, validating required fields (address, loan purpose type, FHA/VA originator identifier) before submission.
- **Endorsement tracking**: MIC (Mortgage Insurance Certificate) endorsement dates are tracked in the Celink boarding specification for servicer transfer.
- **Case number on documents**: The FHA case number is available across document generation, MERS registration, and reporting.

Q3 How are HECM-specific requirements enforced (e.g., counseling, NBS/NBO handling)?

HECM-specific requirements are enforced at multiple levels:

Requirement	Enforcement Mechanism
Counseling	Sent-to-counseling and completion dates tracked; transmitted in FHA Connection payloads; doc package requirements can mandate counseling certificate
Non-Borrowing Spouse (NBS)	Eligible NBS DOB factored into PLF age calculation (younger of borrower/NBS age); ineligible NBS excluded from PLF; special PLF tables for NBS-affected loans; demographics transmitted to FHA Connection
Non-Borrowing Owner (NBO)	Tracked and included in signature lines (security instruments, right to cancel, TIL) but excluded from borrower calculations
NBS/NBO Documents	Dedicated templates for NBS Certifications, NBS/NBO Mortgage Due documents, and deed/signature configurations
Age Eligibility	62+ requirement enforced for all HECM borrowers (excluding NBS/NBO) with descriptive error messages

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Q4 Does the system validate Principal Limit Factors (PLFs) and eligibility criteria?

Yes:

- **PLF tables**: Standard PLFs, NBS/special-age PLFs, and Home for Life PLFs are loaded from versioned data files. The system looks up PLF based on expected rate (rounded to nearest 0.125%) and borrower age.

- **PLF validation tooling**: A management command performs integrity scans of PLF tables and supports single-value lookups with optional NBS flag for special table verification.
- **Age eligibility**: Automated validation requires all borrowers (excluding NBS/NBO) to be 62 or older at closing date for HECM loans.
- **Principal limit calculation**: Computed as PLF multiplied by max claim amount with the correct age (minimum of borrower and eligible NBS ages when applicable).
- **Calculation explanations**: The system documents how PLF was derived, including NBS age adjustments.

Q5 How are FHA reporting and insurance claim requirements supported?

FHA reporting and insurance are supported through:

- **FHA Connection integration**: Direct API integration for case number assignment, HECM insurance application, financial assessment, appraisal logging, duplicate MIC, escrow closeout, and certificate retrieval.
- **HMDA reporting**: HECM loans are correctly coded as loan type 2, purpose 32 (reverse mortgage) in LAR generation.
- **MCR (Mortgage Call Report) generation**: Quarterly reports for NMLS submission including application data, closed loan data, fee information, revenue data, and MLO activity.
- **Investor tape exports**: Celink boarding specifications include MIC endorsement dates and insurance-related fields for servicer transfer.
- Post-closing FHA insurance claim filing (assignment/claim after maturity) is managed outside this origination system through the servicer.

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8 Licensing & State-Specific Compliance

50-State Dynamic Compliance

Document activation logic automatically generates state-appropriate disclosures, instruments, and fee templates based on property state – no manual selection required.

Q1 How does the LOS track and enforce state licensing requirements for loan officers and entities?

Licensing is tracked and enforced through dedicated models and validation gates:

- **Loan officer licenses**: Per-user, per-state records with license number, state, expiration date, and active status. The system validates active, unexpired, non-deleted licenses.
- **Company licenses**: Per-company, per-state records with the same validation logic.
- **Enforcement gates**: When enabled per company, the system blocks loan creation if the loan officer or company lacks a valid license for the property state. License validation also runs during document package generation and loan officer assignment.
- **NMLS ID management**: NMLS IDs are required unless an exemption is set (with mandatory reason). NMLS IDs appear on generated documents and reports.
- **NMLS printouts**: The system generates NMLS Consumer Access printouts for both individual loan officers and companies via automated retrieval.

Q2 Are state-specific disclosures dynamically generated?

Yes. State-specific disclosures are dynamically included in document packages through:

- **Activation logic**: Each document template has configurable activation logic evaluated dynamically. The "property state in" condition limits documents to specified states.
- **State-specific templates**: The system includes state-specific security instruments, notes, net tangible benefit worksheets, and disclosure documents.
- **State configuration**: Security instrument templates use state configuration mappings to select the correct instrument type (deed of trust vs. mortgage) per state.

Q3 How are jurisdictional differences (fees, forms, timing rules) handled?

Jurisdictional differences are handled through:

- **State-scoped fee templates**: Fee templates include a states field; when a loan is created, only templates matching the property state are applied.
- **State-specific forms**: Document activation logic ensures only state-appropriate disclosures and instruments are generated.
- **Licensing gates**: Loan creation and LO assignment are blocked when required state licenses are not valid.
- **Closing date calculation**: Default closing dates account for holidays and weekends.
- **Title integration**: Title vendor integration applies state-specific tolerance defaults based on HUD line mappings.

Q4 Does the system integrate with the Nationwide Multistate Licensing System for validation?

The system integrates with NMLS in the following ways:

- **NMLS Consumer Access printouts**: Automated retrieval of individual and company NMLS Consumer Access PDF pages.
- **MCR report generation**: Quarterly Mortgage Call Reports are generated in the format required for NMLS submission, including application data, closed loans, fees, revenue, and MLO activity by state.
- **NMLS ID tracking**: NMLS IDs are stored for all loan officers and included in generated documents and regulatory reports.
- **NMLS report calculations**: Tabular exports filtered by NMLS ID, date range, and state for reporting.
- The system does not perform real-time API validation against the NMLS registry database; license data is managed within the system.

9 Privacy & Consumer Data Protection

Q1 How does the LOS support compliance with Gramm-Leach-Bliley Act?

GLBA compliance is supported through:

- **PII protection**: Sensitive PII fields (SSN, DOB, and other GLBA-protected data) are stripped from API responses unless explicitly requested, with code comments citing FCRA, GLBA, and CCPA obligations.
- **Role-based access**: Granular permission groups control which users can access borrower data, credit reports, and sensitive loan information. Loan view and edit scopes restrict data visibility.
- **Cross-tenant isolation**: Credit report access enforces company-scoped queries to prevent cross-tenant PII exposure, with dedicated cross-tenant tests.
- **Credit bureau access controls**: Permission groups restrict which credit bureaus each role can access; PDF downloads are filtered accordingly.
- **Secure credential storage**: Sensitive credentials (API keys, OAuth tokens) are stored in environment variables, not in the database.

Q2 Are privacy notices generated and tracked?

The system generates borrower-facing authorization and certification documents including:

- Borrower's Certification and Authorization generated from the document package system.
- Authorization to Pay Off Account generated for payoff authorization.
- All generated documents are tracked in DocumentHistory with timestamps, serial numbers, and S3 storage URLs.
- Dedicated GLBA/privacy notice template generation (annual privacy notices) is managed through operational processes rather than an automated generation system.

Q3 How are consumer consent and authorization recorded?

Consumer consent is recorded through:

- **Document execution**: Authorization and certification documents are generated, included in closing packages, and sent for e-signature via Demand Signatures integration with OAuth-based authentication.
- **Credit authorization**: Credit report orders are logged in the AuditLog with user attribution, and the CreditReport model tracks the ordering user and bureau scope.
- **Immutable audit trail**: The AuditLog records compliance-relevant events (document generation, credit pulls, status changes) with immutable records that cannot be modified or deleted after creation.
- **Document storage**: Signed documents are stored in S3 with versioning.

Q4 Does the system support state privacy laws (e.g., CCPA/CPRA, Virginia CDPA)?

The system includes foundational capabilities supporting state privacy compliance:

- **PII minimization**: API-level PII stripping with explicit CCPA citations in code reduces unnecessary data exposure.
- **Data export**: Loan data export capabilities can support data access requests.
- **Credit report deletion**: Hard-delete capability permanently removes credit bureau data from the system.
- **Audit trail**: All data access and modifications are logged for accountability.
- A dedicated consumer-facing data subject access request (DSAR) portal is not currently implemented; such requests are handled through operational processes.

Q5 How are consumer data access and deletion requests handled?

Consumer data requests are supported through:

- **Data export**: Administrative loan export functions can extract complete loan data for access requests.
- **Credit data deletion**: Hard delete performs permanent removal of all credit-related records (CreditFiles, Liabilities, CreditReport).
- **Soft-delete architecture**: The system's soft-delete pattern supports data retention while hiding records from active queries, enabling compliance with both retention requirements and deletion requests.

- **Audit logging**: Data access and deletion events are captured in the AuditLog.

10 Record Retention & Auditability

Immutable Audit Trail

Every compliance-relevant action is captured in an append-only audit log that cannot be modified or deleted – enforced at the application level, not just by policy.

Q1 What are the system's record retention capabilities?

ReversePilot provides comprehensive record retention:

- **Soft-delete architecture**: All loan domain models preserve records even when "deleted" by setting flags rather than removing rows.
- **Historical records**: Append-only historical tables are maintained for all loan and company models, preserving every field change.
- **Document storage**: Generated PDFs are stored in S3 with DocumentHistory records tracking each version. Uploaded documents are versioned.
- **Immutable audit logs**: AuditLog records cannot be modified or deleted after creation (enforced at the model level).
- **API request logging**: HTTP request/response data is captured with correlation IDs.

Q2 Are retention periods configurable to meet regulatory requirements?

The system's retention architecture supports configurable retention:

- **Soft-delete**: Records are never physically removed through normal operations, supporting long-term retention by default.
- **Database-level retention**: Retention periods can be managed through database administration policies and backup schedules.
- **S3 storage**: Document retention in S3 can be configured with lifecycle policies at the infrastructure level.
- Application-level configurable retention period settings with automated purging are managed through infrastructure configuration.

Q3 Are audit trails immutable and time-stamped?

Yes:

- **AuditLog immutability**: The model enforces immutability — updates raise errors, and deletions are blocked. This is enforced at the ORM level.
- **Timestamps**: AuditLog timestamps use auto-generation with a database index for efficient querying.
- **Historical records**: Model history entries are append-only inserts; each change creates a new row with date, user, and change reason.
- **Status history**: Status transitions are logged with timestamp, user, change source, and additional context.

Q4 Can all loan-level actions (data changes, disclosures, approvals) be reconstructed?

Loan actions can be substantially reconstructed through multiple complementary audit layers:

Audit Layer	What It Captures	Granularity
Model History	Every ORM-persisted field change on loan, borrower, property, fee, and condition models	Per-field, per-change
Status History	Pipeline transitions with from/to status, user, source, and notes	Per-transition
AuditLog	Named semantic events: doc generation, credit pulls, OFAC screenings, investor tape exports	Per-event with metadata
Document History	Generated and modified PDF documents with serial numbers and data snapshots	Per-document version
API Request Log	HTTP request/response data with correlation IDs	Per-request

A dedicated management command walks historical tables for a loan and its related submodels to produce a complete change timeline.

Q5 How does the system support regulatory examinations and audits?

The system provides purpose-built audit support:

- **Audit Log API**: Read-only API with filtering by event type, loan, time range, compliance flags, user, and impersonation. Supports CSV export and statistics endpoints.
- **Company-scoped access**: Superusers see all audit logs; other users see their company's logs only.
- **Compliance filtering**: Compliance-relevant and cost-bearing flags enable focused regulatory review.
- **Per-resource trails**: Loan-level document audit trails and note audit logs are available through dedicated API actions.
- **Investor tape exports**: Regulatory-compliant data exports with audit logging marked as compliance-relevant.
- **HMDA and MCR reports**: Standard regulatory report generation for examiner review.

11 Document Management & Compliance Controls

Multi-layered document controls enforce completeness at every milestone – from application through closing – with version tracking, calculation locks, e-signature integration, and staleness detection.

Q1 How does the LOS ensure required documents are present before key milestones (e.g., closing)?

Document completeness is enforced at multiple milestone gates:

- **Document package requirements**: Admin-configurable rules specify required fields, documents, and status prerequisites for document package generation. Validation blocks PDF generation with structured error responses when requirements are not met.
- **Condition tracking**: Conditions categorized as General, Prior to Docs, Prior to Closing, and Prior to Funding must be cleared before milestones. When enabled, Clear to Close status requires all relevant conditions to be cleared.
- **Status transition requirements**: Per-company rules require specific data fields to be populated for each status transition.
- **Document package validation**: Before generating closing or application packages, the system validates loan officer assignment, state licensing, NMLS ID, title fees, closing date, funding date, MIN, closer, vesting, settlement agent, and warehouse bank.

Q2 Are document versions tracked and locked when required?

Yes:

- **Upload versions**: Version number, upload timestamp, file URL, status, and notes are tracked for each uploaded document revision.
- **Generated document history**: Each PDF generation creates a new record with unique serial number, S3 URL, loan data snapshot, creation timestamp, and staleness tracking.
- **Calculation lock**: Calculations can be locked after a specified point in the process, preventing further changes.

- **Document workflow states**: Workflow states support approved and archived statuses for document review.
- **Data revision tracking**: Staleness detection identifies when generated documents are out of date with current loan data.

Q3 How are e-signatures handled and validated?

E-signatures are handled through integration with Demand Signatures (Documenso):

- **OAuth integration**: Company-level OAuth authentication with the Demand Signatures platform.
- **Document upload and signing**: Documents are uploaded to the platform via API, with signing requests sent to designated parties.
- **API retry logic**: Token refresh and retry mechanisms ensure reliable delivery.
- **Signature lines**: Generated PDF documents include appropriate signature lines for borrowers, non-borrowing owners, non-borrowing spouses, and trustees based on loan party configuration.

Q4 Does the system support compliance with Electronic Signatures in Global and National Commerce Act?

The system supports E-SIGN Act compliance through:

- **Third-party e-signature platform**: Integration with Demand Signatures (Documenso), a purpose-built e-signature platform designed for legal compliance.
- **Document integrity**: Generated documents receive unique serial numbers and are stored in S3 with content hashing.
- **Audit trail**: Document generation, signing requests, and related events are captured in the AuditLog.
- **Record retention**: Signed documents are stored in S3 with version tracking, meeting retention requirements.

Q5 Are document delivery and receipt timestamps recorded?

Document timestamps are recorded at multiple levels:

- **Generation timestamps**: DocumentHistory records when each document package was generated.
- **Upload timestamps**: Each document version records when it was uploaded.
- **OCR processing**: Documents record when they were processed for OCR.
- **S3 storage**: Documents stored in S3 have server-side timestamps.
- **Audit events**: Document generation events include timestamps and user attribution.
- **E-signature delivery**: Document delivery to the Demand Signatures platform is logged through the integration.

12 Consumer Communications & Consent

Q1 How are borrower communications (email, SMS, portal) tracked and archived?

Borrower communications are tracked through:

- **Email service**: A centralized EmailService with logging handles all outbound emails via Mailgun SMTP integration.
- **Notification system**: In-app notifications with optional email delivery. User notification preferences allow per-user configuration. Real-time push via Redis pub/sub.
- **Weekly rate email log**: Immutable send status records for periodic rate communications.
- **Loan status change emails**: Automated emails on loan status transitions use tracked templates.
- **Document delivery**: Document package generation and e-signature sending events are captured in the AuditLog.
- SMS functionality is not currently implemented. The borrower portal is under separate development.

Q2 Does the system enforce consent requirements for electronic communications?

The system supports consent through document-based authorization:

- Borrower's Certification and Authorization generated as part of application document packages, covering authorization for credit checks, information sharing, and electronic communications.
- The Demand Signatures integration handles e-signature consent per the platform's workflow.
- Notification preferences allow users to control their communication settings.

Q3 How are opt-in/opt-out preferences managed?

Opt-in/opt-out is managed through the notification preference system:

- Per-user notification preferences store settings by event type (in-app and email channels).
- The centralized email service respects notification preferences when sending automated communications.

Q4 Are communications monitored for compliance with marketing and solicitation laws?

Communications compliance is supported through:

- **Template-based communications**: Automated emails use standardized templates rather than free-form content.
- **Audit logging**: Communication events are captured in system logs.
- The system does not include dedicated marketing campaign management or CAN-SPAM/TCPA compliance monitoring; marketing communications are managed through operational processes.

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13 Anti-Money Laundering (AML) & Fraud Compliance

Automated screening against OFAC, SAM.gov, and HUD exclusion lists with PDF evidence generation ensures all loan parties are vetted before closing.

Q1 Does the LOS integrate with AML or fraud detection systems?

The system integrates with multiple compliance screening systems:

Screening System	Source	Output
OFAC / SDN	Treasury Department Specially Designated Nationals list	PDF printout per party, S3 archival
SAM.gov Exclusions	System for Award Management	PDF printout per party
HUD LDP	HUD Limited Denial of Participation list	PDF printout per party
Credit Bureau Fraud	MeridianLink (Experian Fraud, TransUnion Fraud)	Add-on products on credit orders

All loan parties (loan officer, borrowers, processor, underwriter, appraisers, title company) are identified for screening via a dedicated compliance party service.

Q2 How are suspicious activities flagged and escalated?

Suspicious activity indicators are surfaced through:

- **Compliance screening results**: OFAC, SAM.gov, and HUD LDP screenings generate PDF printouts that document search results, stored as loan documents for review.
- **Compliance party service**: The system identifies all parties requiring screening (loan officer, borrowers, processor, underwriter, appraisers, title company).
- **Task progress tracking**: Compliance screening tasks report progress, success, and failure status via async processing.

- **Audit trail**: Screening events are logged for audit review.
- The system does not include automated SAR (Suspicious Activity Report) generation or escalation workflows; SAR filing is managed through operational compliance processes.

Q3 Are identity verification (KYC) processes supported?

Identity verification is supported through:

- **Credit report ordering**: Tri-bureau credit reports require borrower PII (SSN, DOB, address) and serve as an identity corroboration mechanism.
- **OFAC/SAM/LDP screening**: Name-based screening against federal exclusion lists.
- **Document collection**: The system supports collection and storage of identity documents through the document management system with OCR processing.
- **Operational checklists**: Pre-closing compliance documentation includes identity verification steps.
- The system does not integrate with dedicated third-party KYC/IDV vendors; identity verification is primarily document-based.

Q4 How does the system support compliance with Bank Secrecy Act (BSA) requirements?

BSA compliance is supported through:

- **OFAC screening**: Mandatory screening capability against the SDN list for all loan parties, with documented results stored as loan documents.
- **SAM.gov and HUD LDP screening**: Additional exclusion list screening.
- **Audit trail**: Immutable AuditLog with compliance flags supports BSA record-keeping requirements.
- **Credit report tracking**: All credit inquiries are logged with user attribution, bureau scope, and timestamps.
- The system does not include a dedicated Currency Transaction Report (CTR) or SAR filing module; those requirements are managed through the institution's broader BSA compliance program.

Q5 Are audit logs available for investigations?

Yes. The system provides comprehensive audit log access for investigations:

- **Audit Log API**: Read-only REST API with filtering by event type, loan ID, user, date range, compliance relevance, cost-bearing flag, and impersonation status.
- **CSV export**: Audit logs can be exported to CSV for external analysis and regulatory production.
- **Statistics endpoint**: Aggregated audit statistics for trend analysis.
- **Correlation IDs**: Request-level correlation IDs link AuditLog entries to API request log records for full request reconstruction.
- **Per-loan trails**: Loan-specific audit trails can be queried through dedicated API actions.
- **Company-scoped access**: Appropriate access controls ensure investigators see relevant data within their authorization scope.

14 Third-Party Service Provider Compliance

Q1 How are third-party vendors (e.g., credit bureaus, appraisal services) vetted within the LOS?

Third-party vendor management is supported through:

- **Credit bureau configuration**: Company-level and permission-group-level controls restrict which credit bureaus can be accessed, ensuring only approved bureau relationships are used.
- **Settlement agent management**: Provider details are tracked per company with active/inactive status and affiliation flags.
- **Title company integration**: Title vendor relationships are managed with structured API communications.
- **Appraiser tracking**: Appraiser information is tracked on loans and included in compliance screening (OFAC/SAM/LDP).
- **Company credentials**: Vendor credentials are stored with history tracking.

Q2 Are compliance requirements enforced across integrations?

Yes. Integration-level compliance is enforced through:

- **Permission-gated access**: All third-party integration endpoints require specific permissions.
- **Tenant isolation**: Credit report access uses company-scoped queries to prevent cross-tenant data access.
- **Bureau restrictions**: Credit PDF downloads are filtered to only bureaus allowed by the user's permission group.
- **Audit logging**: Third-party interactions (credit pulls, document deliveries, FHA submissions) are logged in the AuditLog.
- **Input validation**: Integration payloads validate required fields before submission.

Q3 How does the system ensure third-party data is used appropriately?

Data usage controls include:

- **PII minimization**: Borrower PII is stripped from API responses unless explicitly requested, reducing unnecessary data exposure.
- **Credit data isolation**: Credit reports are scoped to authorized users and companies; hard-delete capability supports data disposal when no longer needed.
- **Document tagging**: Third-party documents (e.g., OFAC printouts) are stored with specific tags for proper categorization and retrieval.
- **API request logging**: All external API interactions are logged with correlation IDs.

Q4 Are service provider agreements and disclosures tracked?

Service provider disclosures are managed through:

- **Settlement Service Provider List**: Auto-generated from active, affiliated settlement agent records.
- **Affiliated Business Arrangement Disclosure**: Template-based generation for affiliated service providers.
- **Document management**: Provider agreements and disclosures can be uploaded and stored in the document management system with version tracking.
- **Document folder taxonomy**: Dedicated folders organize provider-related documents.

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15 Error Handling, Exceptions, and Overrides

60+ Granular Permissions

Every API action is gated by role-based permissions with separate controls for forward and backward status transitions, loan scope, and broker restrictions.

Q1 How are compliance exceptions identified and tracked?

Compliance exceptions are identified and tracked through:

- **Validation services**: Document package validation identifies missing fields, documents, and prerequisites with structured error responses including field keys, labels, and messages.
- **Tolerance monitoring**: The Disclosure API identifies out-of-tolerance fee conditions and calculates cure amounts.
- **Status transition blocks**: Status transition validation identifies missing required fields.
- **License validation**: License status checks identify expired or missing licenses at loan creation, LO assignment, and document generation.
- **Condition tracking**: Uncleared conditions are identified before milestone transitions (Clear to Close).

Q2 Are overrides logged with justification and user attribution?

Yes:

- **AuditLog**: All compliance-relevant actions are logged with user, email, display name, optional impersonation details, and metadata fields.
- **Status change notes**: Status change notes and context are stored in LoanStatusHistory and AuditLog metadata, providing justification for status transitions.
- **Tolerance cures**: Applied cures are logged as tolerance-cure-applied audit events.
- **VCC reasons**: Re-disclosure events include Changed Circumstance reason codes in DocumentHistory.
- **History change reason**: A change reason field is available on all historical records for change justifi-

cation.

Q3 What controls exist to prevent unauthorized overrides?

Unauthorized overrides are prevented through:

- **Permission system**: 60+ granular permissions control access to specific functions, enforced on every API action.
- **Loan scope controls**: Permission groups restrict which loans users can access or modify.
- **Status transition permissions**: Forward and backward status transitions are separately controlled per permission group.
- **Broker restrictions**: Broker company users are prevented from accessing certain functions.
- **Server-side enforcement**: All validations run server-side, not just in the UI.
- **Immutable audit**: AuditLog records cannot be modified or deleted, ensuring override records persist.

Q4 Are exception reports available for audit review?

Yes:

- **Audit Log API**: Filterable by compliance-relevant flag to surface compliance-significant events. CSV export supports external analysis.
- **Statistics endpoint**: Aggregated counts and trends for audit review.
- **Tolerance status**: API provides per-loan tolerance status showing out-of-tolerance conditions and applied cures.
- **Validation results**: Document package validation returns structured error lists that can be reviewed.
- **HMDA validation**: HMDA reporting endpoint returns per-loan data completeness status.

16 Change Management & Regulatory Impact

A structured CI/CD pipeline with automated compliance testing, multi-environment deployment, and immutable historical records ensures regulatory integrity is preserved through every system change.

Q1 How are system changes evaluated for regulatory impact?

System changes undergo a structured evaluation process:

- **Pull request workflow**: All code changes require pull requests; direct merges to protected branches are prohibited.
- **Automated testing**: CI/CD pipeline runs comprehensive test suites including compliance-related tests (closing cost ratio tests, HMDA reporting tests, cross-tenant PII tests, investor tape tests).
- **Code review**: Pull requests require review before merge, with compliance-impacting changes identified during review.
- **Pre-commit hooks**: Code formatting and basic checks are enforced locally before code reaches CI.

Q2 Are compliance teams involved in release approvals?

The deployment pipeline supports compliance oversight:

- **Multi-environment deployment**: Changes progress through dev, beta, and prod environments with separate deployment workflows, allowing compliance review at each stage.
- **PR-based workflow**: Pull requests provide a documented review point where compliance stakeholders can evaluate changes before merge.
- **Test evidence**: CI results provide automated verification of compliance-related test suites.

Q3 Is there a documented process for validating compliance after updates?

Post-update validation is supported through:

- **Automated test suite**: Compliance-related tests including HECM calculations, closing cost ratios, HMDA reporting, fee sync validation, PLF lookups, cross-tenant data isolation, and investor tape generation.
- **PLF validation command**: A management command verifies PLF table integrity after updates.
- **Fee sync auditing**: A management command validates IMIP, origination, and broker fee calculations against expected values.
- **HUD field mapping**: The HUD field mapping API enables side-by-side comparison of system calculations with HUD's online HECM calculator.
- **Multi-environment testing**: Beta environment allows compliance validation before production deployment.

Q4 Are historical compliance states preserved after system changes?

Yes. Historical states are preserved through:

- **Model history**: Every model change creates an immutable historical record, preserving the exact state of data at any point in time.
- **Soft-delete**: Records are never physically removed, preserving historical compliance state.
- **DocumentHistory**: Generated documents include a loan snapshot capturing the data state at generation time.
- **Disclosure records**: Point-in-time fee snapshots are preserved for tolerance comparison.
- **Database backups**: Infrastructure-level backup and migration procedures are documented.

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17 Servicing Transfer & Post-Closing Compliance

Q1 How does the LOS support compliance during servicing transfers?

Servicing transfer compliance is supported through:

- **Celink boarding specifications**: Comprehensive boarding tape generation maps loan data to servicer transfer format, including MIC endorsement dates, borrower information, property details, financial terms, and insurance data.
- **Investor tape exports**: The investor tape builder generates Excel exports with all loan data required for transfer, with validation warnings for missing fields.
- **MISMO export**: Standardized loan data exports for industry-standard transfer.
- **MERS registration**: Integration with MERS (Mortgage Electronic Registration Systems) for loan transfer tracking, including FHA case number validation.

Q2 Are required notices generated and tracked?

Yes:

- The system generates a Notice of Servicing Transfer document with effective date (closing date + 15 days), servicer identification, and investor information.
- All generated notices are tracked in DocumentHistory with timestamps, serial numbers, and S3 storage.
- Document generation events are captured in the AuditLog.

Q3 How is data accuracy ensured when transferring to servicers?

Data accuracy for servicer transfers is ensured through:

- **Boarding tape validation**: Celink boarding specification includes field-level validation rules.
- **Investor tape warnings**: The investor tape builder returns validation warnings identifying missing or potentially inaccurate fields.

- **Automated calculations**: Transfer data is derived from the same calculation engines used throughout the loan lifecycle, ensuring consistency.
- **Audit trail**: Investor tape exports are logged as compliance-relevant events.

Q4 Are post-closing audits supported?

Post-closing audit capabilities include:

- **Complete loan history**: Full change history for all loan-related models.
- **Status history**: The complete status progression through closing and beyond is documented.
- **Document archive**: All generated documents (disclosures, closing packages, compliance screenings) are archived in S3 with history records.
- **Audit log queries**: The Audit Log API supports date-range filtering for post-closing review.
- **Calculation reconstruction**: Historical calculation inputs and outputs can be reconstructed from model history.

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18 Complaints, Disputes, and Consumer Issues

Q1 Does the system track borrower complaints and disputes?

The system provides foundational capabilities for tracking borrower issues:

- Complaints can be documented through loan-level notes and conditions with user attribution and timestamps.
- Compliance-relevant events and actions taken in response to complaints are logged with immutable records.
- Loan status changes related to dispute resolution are tracked in status history.
- A dedicated complaint management module with categorization, escalation workflows, and resolution tracking is not currently implemented as a standalone feature.

Q2 How are complaints categorized and escalated?

Complaint handling relies on operational processes supported by system capabilities:

- Conditions can be used to track complaint-related items with categorization (General, Prior to Docs, Prior to Closing, Prior to Funding).
- Loan status changes can reflect complaint-related actions with notes and context.
- Email notifications can be triggered for relevant stakeholders.
- Automated complaint categorization and escalation rules are managed through operational procedures rather than system-enforced workflows.

Q3 Are resolution timelines tracked?

Resolution tracking is supported through:

- Condition clearing dates and clearing user track when complaint-related conditions are resolved.
- Status history timestamps document the timeline of actions taken.

- All logged events include immutable timestamps for timeline reconstruction.

Q4 Can complaint data be reported to regulators if required?

Yes. Data for regulatory reporting can be extracted through:

- **Audit Log CSV export**: The AuditLog API supports filtered CSV export for regulatory production.
- **Loan data export**: Administrative export functions can extract loan-level data.
- **Historical reconstruction**: Model history and AuditLog provide the data needed to reconstruct event timelines for regulatory submissions.

19 Training & User Compliance Controls

Q1 Are compliance-related prompts or validations embedded in user workflows?

Yes. Compliance validations are embedded throughout the workflow:

- **Document package validation**: Before generating application or closing packages, the system validates loan officer licensing, NMLS ID, required fields (closing date, funding date, settlement agent, warehouse bank, vesting, etc.), and displays structured error messages with field-level guidance.
- **Status transition validation**: Required fields for each status transition block progression until requirements are met.
- **License gates**: Loan creation and LO assignment are blocked when required state licenses are missing or expired.
- **Condition clearance**: Clear to Close status can be blocked until all relevant conditions are cleared.
- **Age validation**: HECM borrower age (62+) is validated with descriptive error messages.
- **Tolerance warnings**: Fee tolerance monitoring surfaces warnings at 80% of threshold and blocks at 100%.

Q2 Does the system enforce required steps (e.g., disclosures before proceeding)?

Yes. Required steps are enforced through:

- **Sequential status pipeline**: Forward progression through pipeline stages is enforced; backward transitions require explicit permission.
- **Configurable transition requirements**: Per-company rules define required data fields for each status transition.
- **Document generation prerequisites**: Package validation blocks generation until all required fields and documents are present.
- **HECM product disclosure**: Configurable enforcement of all three HECM product type disclosures before proceeding.

Q3 Are users prevented from bypassing compliance-critical actions?

Yes. Bypass prevention is enforced through:

- **Server-side validation**: All compliance checks run server-side, not just in the UI, preventing API-level bypasses.
- **Permission enforcement**: Access controls are enforced on every API action.
- **Immutable audit**: AuditLog records cannot be modified or deleted, ensuring accountability.
- **Status transition controls**: Forward and backward transition permissions are separately controlled per permission group.
- **Calculation lock**: Locked calculations prevent modification after a specified point.

Q4 Is there support for compliance training or attestation tracking?

The system supports compliance awareness through:

- Compliance documentation provides guides for HMDA, MCR, licensing, and signatures.
- Operational checklists provide a comprehensive pre-closing compliance checklist.
- Validation error messages include descriptive text guiding users to resolve compliance issues.
- Formal compliance training course tracking, attestation records, and certification management are not implemented as system features; training tracking is managed through external HR/compliance systems.

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20 Reporting & Regulatory Submissions

Built-in report generation for HMDA, MCR, investor tapes, MISMO, and NMLS — with source data validation, pre-export warnings, and permission-gated access.

Q1 What standard regulatory reports can the LOS generate?

ReversePilot generates the following regulatory reports:

Report	Format	Purpose
HMDA LAR	.txt (pipe), CSV	CFPB submission: ULI, demographics, census tract, loan terms, action taken
Mortgage Call Reports	Excel, JSON	Quarterly NMLS submission: applications, closed loans, fees, revenue, MLO activity
Investor Tapes	Excel	Servicer/investor transfer with validation warnings, configurable by tape type
Celink Boarding	Spec v23	Servicer-specific boarding specifications for Celink transfer
MISMO Exports	XML	Industry-standard loan data transfer
NMLS Reports	Tabular	Filterable by NMLS ID, date range, and state
OFAC/SAM/LDP	PDF	Compliance screening printouts for each loan party
Revenue Reports	Tabular	Company and loan officer revenue reporting

Each report type is gated by specific permissions (e.g., HMDA reporting, investor tape builder, MCR generation).

Q2 Are reports configurable for jurisdictional requirements?

Yes:

- **MCR reports**: Configurable by quarter, year, and state for state-specific NMLS submissions.

- **HMDA reports**: Filterable by reporting year with company-specific LEI and contact information.
- **Investor tapes**: Configurable by tape type with per-company field mappings.
- **NMLS reports**: Filterable by state and NMLS ID.
- **Permission-gated**: Each report type requires specific permissions.

Q3 How is report accuracy validated?

Report accuracy is validated through:

- **Source data validation**: HMDA validation checks ULI and census tract completeness before export. Investor tape builder generates validation warnings for missing fields.
- **Automated tests**: Test suites cover HMDA reporting, investor tape generation, closing cost ratios, and fee calculations.
- **PLF validation**: Management command verifies PLF table integrity.
- **Fee sync auditing**: Management command validates fee calculations against expected values.
- **HUD calculator comparison**: HUD field mapping service enables manual verification against HUD's online calculator.
- **Pre-export warnings**: Investor tape exports include validation warning headers identifying data quality issues.

Q4 Does the system maintain submission history and confirmations?

Submission tracking includes:

- **Audit logging**: Report generation events are logged as compliance-relevant AuditLog entries with user attribution and timestamps.
- **Document storage**: Generated reports can be stored as loan documents in S3 with version tracking.
- **Email logs**: Periodic communication submissions are tracked.
- External submission confirmations (e.g., CFPB HMDA Platform receipt, NMLS MCR acceptance) are managed outside the system through the respective regulatory platforms.

ReversePilot

Have questions about our compliance practices?

We'd love to hear from you. Whether you're evaluating ReversePilot for your organization or have specific questions about our regulatory compliance and data protection practices, our team is here to help.

Get in Touch

www.reversepilot.com

This document is provided for informational purposes and is subject to change without notice. The responses contained herein reflect ReversePilot's compliance posture as of April 2026. For the most current information, please contact our team directly.