

Confidential Supervisory Information

THE COMMONWEALTH OF MASSACHUSETTS DIVISION OF BANKS



EXAMINATION REPORT

Examination Start Date: <Start Date>
Entity Name: <Entity Name>
<NMLS/License> Number: <NMLS Number>
City, State: <City>, <State>

Entity Type: Non-Depository
License Type: Choose License Type(s)
Examination Type: Choose Examination Type
Subordinate and Affiliated Organizations Examined: [Click here to enter text.](#)

PROHIBITION OF DISCLOSURE OR RELEASE

This document is the property of the Massachusetts Division of Banks (Division), and the Division furnishes this document to the entity for its confidential use. The entity's directors/trustees, officers, or employees may not disclose the report or any portion of it, to unauthorized persons or organizations. Unauthorized persons or organizations include anyone not officially connected with the entity as an officer, director/trustee, employee, attorney, auditor, independent auditor, or parent holding company. The entity shall under no circumstances publish, or make public in any manner, this Examination Report.

If the entity receives a subpoena or other legal process calling for production of this document, notify the Legal Unit of the Division immediately.

Division of Banks**Examination Report****Entity Name: Click & Type****Examination Start Date: mm/dd/year****Table of Contents**

EXECUTIVE SUMMARY	#
<i>BACKGROUND AND SCOPE OF REVIEW</i>	
<i>CONCLUSIONS AND COMMENTS</i>	
<i>CONSUMER COMPLIANCE RATINGS</i>	
COMPLIANCE MANAGEMENT SYSTEM	#
FINANCIAL CONDITION	#
CONSUMER PROTECTION REVIEW:	#
<i>TRANSACTION TESTING</i>	
<INSERT OTHER AREA REVIEWED NAME>	
AML/CFT REVIEW	#
<INSERT OTHER AREA REVIEWED NAME>	
COMPLIANCE WITH ENFORCEMENT ACTIONS	#
MATTERS REQUIRING ATTENTION	#

Division of Banks

Examination Report

Entity Name: Click & Type

Examination Start Date: mm/dd/year

Executive Summary

Background and Scope of Review

[Click&type]

Conclusions and Comments

[Click&type]

Division of Banks**Examination Report****Entity Name: Click & Type****Examination Start Date: mm/dd/year****Consumer Compliance Rating(s)**

The overall rating is based on the findings discussed in this Examination Report. The rating is based upon a scale of “1” through “5” in increasing order of supervisory concern; a rating of “1” represents the highest rating and consequently the lowest level of supervisory concern, while “5” represents the lowest, most critically deficient level of performance, and therefore, the highest degree of supervisory concern.

	Current Examination	Previous Examinations (if applicable)	
	DATE	DATE	DATE
Compliance Rating	Choose an item.	Choose an item.	Choose an item.
Financial Rating	Choose an item.	Choose an item.	Choose an item.
CRA Rating	Choose an item.	Choose an item.	Choose an item.

Compliance Rating

The Division considers an entity’s adherence to consumer protection laws and regulations, and the effectiveness of its compliance management system (CMS) when determining the overall consumer protection compliance rating. The consumer protection compliance rating reflects the effectiveness of an institution's CMS to ensure compliance with consumer protection laws and regulations and reduce the risk of harm to consumers. The consumer protection compliance rating also considers a licensed entity’s financial condition and its compliance with licensing standards.

<“1”>

The highest rating of 1 is assigned to a financial institution that maintains a strong CMS and takes action to prevent violations of law and consumer harm.

<“2”>

A rating of 2 is assigned to a financial institution that maintains a CMS that is satisfactory at managing consumer compliance risk in the institution’s products and services and at substantially limiting violations of law and consumer harm.

<“3”>

A rating of 3 reflects a CMS deficient at managing consumer compliance risk in the institution’s products and services and at limiting violations of law and consumer harm.

<“4”>

A rating of 4 reflects a CMS seriously deficient at managing consumer compliance risk in the institution’s products and services and/or at preventing violations of law and consumer harm.

Division of Banks**Examination Report****Entity Name: Click & Type****Examination Start Date: mm/dd/year**

“Seriously deficient” indicates fundamental and persistent weaknesses in crucial CMS elements and severe inadequacies in core compliance areas necessary to operate within the scope of statutory and regulatory consumer protection requirements and to prevent consumer harm.

<“5”>

A rating of 5 reflects a CMS critically deficient at managing consumer compliance risk in the institution’s products and services and/or at preventing violations of law and consumer harm. “Critically deficient” indicates an absence of crucial CMS elements and a demonstrated lack of willingness or capability to take the appropriate steps necessary to operate within the scope of statutory and regulatory consumer protection requirements and to prevent consumer harm.

Financial Rating

<“1”>

A supervised entity with this rating is basically sound in every respect; any adverse findings or comments are of a minor nature and can be handled in a routine manner. Such institutions are resistant to external economic and financial disturbances and are more capable of withstanding the vagaries of business conditions than institutions with lower ratings. As a result, such institutions give no cause for supervisory concern.

<“2”>

A supervised entity with this rating is fundamentally sound, but may reflect modest weaknesses correctable in the normal course of business. The nature and severity of deficiencies, however, are not considered material and, therefore, such institutions are stable and able to withstand business fluctuations quite well. While areas of weakness could develop into conditions of greater concern, the supervisory response is limited to the extent that minor adjustments are resolved in the normal course and operations continue satisfactory.

<“3”>

A supervised entity with this rating exhibits financial, operational or compliance weaknesses ranging from moderately severe to unsatisfactory. When weaknesses relate to financial condition, such institutions may be vulnerable to the onset of adverse business conditions and could easily deteriorate if concerted action is not effective in correcting the areas of weakness. Institutions which are in significant non-compliance with laws and regulations may also be accorded this rating. Generally, these institutions give cause for supervisory concern and require more than normal supervision to address deficiencies. Overall strength and financial capacity, however, are still such as to make failure only a remote possibility.

<“4”>

A supervised entity with this rating has an immoderate volume of serious financial weaknesses or a combination of other conditions that are unsatisfactory. Major and serious problems or unsafe

Division of Banks**Examination Report****Entity Name: Click & Type****Examination Start Date: mm/dd/year**

and unsound conditions may exist which are not being satisfactorily addressed or resolved. Unless effective action is taken to correct these conditions, they could reasonably develop into a situation that could impair future viability, and, as such, could constitute a threat to the interests of consumers. A higher potential for failure is present but is not yet imminent or pronounced. Institutions in this category require close supervisory attention and financial surveillance and a definitive plan for corrective action.

<“5”>

A supervised entity with this rating has an extremely high immediate or near term probability of failure. The volume and severity of weaknesses or unsafe and unsound conditions are so critical as to require urgent aid from stockholders or other public or private sources of financial assistance. In the absence of urgent and decisive corrective measures, these situations will likely result in failure or some form of emergency assistance, merger or acquisition.

CRA Rating

In assigning a rating, the Commissioner evaluates an institution's performance under the applicable performance criteria in accordance with the applicable statutes and regulations, which provides for adjustments on the basis of evidence of discriminatory or other illegal credit practices.

An institution's performance need not fit each aspect of a particular rating profile in order to receive that rating, and exceptionally strong performance with respect to some aspects may compensate for weak performance in others. The institution's overall performance, however, must be consistent with safe and sound lending practices and generally with the appropriate rating profile.

<Insert Entity Name here> is assigned a rating of <Insert rating here and choose the appropriate definition language below. Then delete the other ratings and definition language below. NOTE: THE DIVISION ADOPTED THESE DEFINITIONS BASED ON THE REQUIREMENTS IN 209 CMR 54.00; THEY MAY NOT BE EDITED.>. An institution in this group

“Outstanding”

has an outstanding record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

“High Satisfactory”

has a highly satisfactory record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

“Satisfactory”

has a satisfactory record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

Division of Banks

Examination Report

Entity Name: Click & Type

Examination Start Date: mm/dd/year

“Needs to Improve”

needs to improve its overall record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

“Substantial Noncompliance”

has a substantially deficient record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

/s/ <EIC Signature>
Examiner-in-Charge

/s/ <Manager Signature>
<Senior> Deputy Commissioner

Division of Banks**Examination Report****Entity Name: Click & Type****Examination Start Date: mm/dd/year****Compliance Management System**

The Division reviewed the entity's compliance management system (CMS), including, board and management oversight, policies and procedures, training program, monitoring/audit function, information security program, and complaint processes. The Division evaluates the effectiveness of an entity's CMS to ensure compliance with consumer protection laws, licensing standards, and regulations and reduce the risk of harm to consumers considering the size of the entity and the scope of its operations.

Conclusion

[Click&type]

Comments and Supporting AnalysisBoard of Directors and Management Oversight

[Click&type]

Policies and Procedures

[Click&type]

Training

[Click&type]

Monitoring and/or Audit

[Click&type]

Information Security Program

[Click&type]

Consumer Complaint Response

[Click&type]

Required Corrective Actions

[Click&type]

Division of Banks

Examination Report

Entity Name: Click & Type

Examination Start Date: mm/dd/year

Financial Condition

[Click&type]

Conclusion

[Click&type]

Comments and Supporting Analysis

[Click&type]

Required Corrective Actions

[Click&type]

Division of Banks

Examination Report

Entity Name: Click & Type

Examination Start Date: mm/dd/year

Consumer Protection Review

[Click&type]

Conclusion

[Click&type]

Transaction Testing

[Click&type]

<Finding Header>

[Click&type]

Required Corrective Action

[Click&type]

<Finding Header>

[Click&type]

Required Corrective Action

[Click&type]

<Finding Header>

[Click&type]

Required Corrective Action

[Click&type]

<Other Area Reviewed>

<Finding Header>

[Click&type]

Required Corrective Action

[Click&type]

Division of Banks

Examination Report

Entity Name: Click & Type

Examination Start Date: mm/dd/year

AML/CFT Review

[Click&type]

Conclusion

[Click&type]

<Other Area Reviewed>

<Finding Header>

[Click&type]

Required Corrective Action

[Click&type]

Division of Banks

Examination Report

Entity Name: Click & Type

Examination Start Date: mm/dd/year

Compliance with Enforcement Actions

[Click&type]

Conclusion

[Click&type]

Comments and Supporting Analysis

[Click&type]

Required Corrective Actions

[Click&type]

Division of Banks**Examination Report****Entity Name: Click & Type****Examination Start Date: mm/dd/year****Matters Requiring Attention**

<This examination identified no matters requiring a written response to the Division. However, the Licensee is still responsible for performing any corrective action identified within this Report.

or

The examination identified the following matters that require a written response to the Division. The Licensee must respond with proof of completed corrective action, or at minimum a detailed action plan for corrective actions to all matters requiring attention, on or before the Reporting Date identified below. The Licensee is also responsible for performing any other corrective action identified within this Report.>

Reporting date: [Insert # of Days] calendar days from the transmittal of this report.

Compliance Management System

<Finding Header>

- [Click&type]
- [Click&type]

<Finding Header>

- [Click&type]
- [Click&type]

Financial Condition

<Finding Header>

- [Click&type]
- [Click&type]

<Finding Header>

- [Click&type]
- [Click&type]

Consumer Protection Review***Transaction Testing***

<Finding Header>

- [Click&type]
- [Click&type]

Division of Banks

Examination Report

Entity Name: Click & Type

Examination Start Date: mm/dd/year

<Other Are Reviewed>

<Finding Header>

- [Click&type]
- [Click&type]

<Finding Header>

- [Click&type]
- [Click&type]

AML/CFT Compliance Review

<Finding Header>

- [Click&type]
- [Click&type]

<Finding Header>

- [Click&type]
- [Click&type]

Compliance with Enforcement Actions

<Finding Header>

- [Click&type]
- [Click&type]

<Finding Header>

- [Click&type]
- [Click&type]