



Integration and Use Instructions

This short guide will help you to successfully integrate the MSTARS Training System into your operation. Companies that operate in the Debt Relief space need to demonstrate that they are focused on and in compliance with State and Federal Laws. Our system will help you to understand the rules and assist you in building out the systems necessary to demonstrate compliance to the laws. In order to better demonstrate compliance to the rules, you need to understand what they are and how to demonstrate that you are concerned about mitigating risks to consumers engaging your services. The CFPB UDAAP Examination Manual lays out a clear framework of the systems you will need to have in place in order to demonstrate compliance. Training is a major part of that. The MSTARS Training System is designed to train your team to operate compliantly from a 3rd party training perspective. You will need an in-house training program as well, and may be in limited scope and fashion, but this system is designed to be used as a verifiable Compliance Training, Testing and Documenting protocol. It will demonstrate that you have, in fact, a demonstrated, viable compliance training system in place. Our system trains nearly every consumer facing department in the disclosures, laws, rules and requirements laid out in Section 5 of the FTC act, TSR Requirements and CFPB UDAAP mandates. Having this system permanently in place alongside your current training curriculum adds an extra layer of compliance armor to your operation. Our training system consists of over 60 hours of comprehensive, sales, marketing, management, operations and customer service training. It will create a more well-rounded staff member, trained and prepared to perform at a higher level of knowledge, performance and compliance. Above and beyond this, our NDCC Certification System demonstrates the trained agent's information solubility and deployment ability. The results of the examination are documented for each agent, further demonstrating their education and deployment of their compliance training. Because it is an unbiased 3rd party training and testing program, it will help you demonstrate to regulators that you are not only interested in being compliant, but have also invested in the training and testing of each staff member by a 3rd party industry authority in this field. It is also a documentable system. Agents will receive a NDCC Certification upon successful training and testing. This needs to be re-certified each year, but is at no cost if done prior to lapse. Each staff member that completes training must have completion documents filed in their employee file. You should also document every live Compliance Class you attend as an MSTARS member. The following guidelines will guide you through the integration process. You will need to conduct and document regular meetings with all staff throughout the process. Congratulations on your decision to integrate this into your operation. The training will serve your operation well.

Steps to Integration and Use

1. Step one is easy. Simply log in and explore the system. Get familiar with your login information and note the courses available. I would recommend starting with the Senior Staff.
2. Have Senior Staff go through the Total Compliance Section Modules 1-5
3. Have Senior Staff go through the Elite Sessions, Modules 4 and 3 (in order of rank/responsibility)
4. Have Senior Staff go through the training start to finish in order to gain a better understanding of the curriculum being taught. You may find several areas of operational difference. You need to address these differences and make changes if necessary to your operational status quo. That's the point. Don't let ego get in the way of your progress. The point is to find and address any areas of potential non-compliance and integrate new systems and policies to achieve total compliance. Much of the information you may already know. Go through it anyway. Small differences can make or break your compliance programs. You may even get inspired to expand or improve areas beyond what is taught. That's a good thing. Trudge through.
5. Have Customer Service go through Elite Module 2, then 1 to better understand the Sales Agent's Compliance responsibilities. It would be even better to have them attend the agent training sessions and get them NDCC Certified. The more they know, the more compliant they will be as well. Knowledge is power in this case. *****This training may shake things up a bit and feel like it is unraveling your standard operating procedures. Do NOT fight this process. Conduct regular meetings at appropriate intervals to regroup and implement any changes your employees may introduce. Let your team have a say in this process. The goal is to identify potential compliance risks and implement new systems if necessary to address the challenges. Document EVERY meeting held with staff and document the details of the meetings to further demonstrate your journey and processes into compliance.*****
6. Have sales and marketing agents (consultants) go through the agent training in the order they are linked on the site. Since this access is remote and automated, they may opt to go through the system from home as well. As long as they get through it and pass the NDCC Certification Exam, it is up to you and your senior staff to decide whether that is appropriate. Explain to them that the NDCC Certification is MUCH different from other certifications they may have taken. It is very advanced and they will NOT pass it if they don't go through every module. Failed Exams are documented as well.
7. Have sales agents go through Elite Agent once they have completed the 3 Base Module Sections (Basic, Compliance and Advanced-IN THAT ORDER).
8. Have Sales Staff go through the Section 5 Tactical Training last.
9. Order NDCC Certifications ONLY after agents have completed the tasks above and feel ready. You want them to pass the FIRST time. Once they receive a passing grade, we will automatically request agent information for their Compliance Certificate.

Maintenance Use. VERY IMPORTANT!

1. Once you have been trained throughout the system and have certified the staff, you should have new auditing protocols in place throughout your operation. Any time an agent or staff member manifests deviance to the compliance rules, minor or major, you will need to document this violation and reconcile it through documented processes. The agent should be directed to the appropriate modules that address the violation and re-train them on the protocol. There is a quiz at the end of the Compliance Training. If they should need re-training, the quiz will serve as proof that the issue was addressed and re-training was performed. They should also receive a coaching session from the manager or senior staff member once they complete the re-training modules and pass the quiz. Document this EVERY time.
2. It is important to remember that this Training System isn't a one-time use program. It is designed to be completely integrated into your systems, operations procedures and protocols. You will need to use it regularly and document its use. You will glean new perspectives every time you go through the curriculum. Each one-year period, the staff must be re-certified. This program helps demonstrate that you have multiple Compliance System and Compliance Training Programs in place. The system will ensure maximum uniformity and adherence to the compliance message. The information may feel repetitive in some aspects. It is supposed to be that way. The psychology used in creating this is to present challenging curriculum from several perspectives to drive home the key training points and core perspectives. Similar to military type drills, this ensures knowledge solubility.
3. Managers and Senior Staff should communicate ANY questions, concerns or meetings with us and document those meetings, even if it is a simple email to our staff. I would conduct regular quarterly phone conference calls with Mr. Hearn to discuss compliance concerns, questions or strategies. The dates, topics and details of the calls should be filed as well to serve as additional compliance focused meeting documentation. All calls to your attorney or legal counsel should be documented as well.
4. Once our compliance verification video series is on-line, you will need to have every client go through the short videos and take the Compliance Verification Exam. Those will be forwarded to the emails provided and will be forwarded to your office to be filed in the client file. This will serve as additional compliance verification and will add even more documentation to demonstrate compliance to the laws.
5. Should the need arise, you may request a private, "Special Session" to address specific company training deficits and/or needs. We are happy to conduct these sessions to better equip your team. Requests are scheduled on a case-by-case basis and may or may not carry additional costs. Call for specifics if necessary. Onward and Upward, friends!