

# Title Insurance and Settlement Company

## Best Practices

The employees of **A Plus Settlement Services, Inc.** ([www.partnerwithaplus.com](http://www.partnerwithaplus.com)) are dedicated to professionalism and compliance when it comes to handling the financial transactions of consumers. **A Plus Settlement Services, Inc.** is a licensed title insurance agent for the Commonwealth of Pennsylvania and has 4 employees and 3 locations at 201 S. Second Street, Ste. 101, McConnellsburg, PA 17233; 263 Lincoln Way E, Chambersburg, PA 17201; and 17A W. Baltimore Street, Greencastle, PA 17225.

Years in business:

**A Plus Settlement Services, Inc.** began operations in June of 2000.

Years of experience

Employees of **A Plus Settlement Services, Inc.** have over 40 years of combined experience in real estate title and settlement practices.

We are members of the *American Land Title Association* and the *Pennsylvania Land Title Association*.

**A Plus Settlement Services, Inc.** is a vetted closing professional with Secure Insight, Inc. (formerly Secure Settlements, Inc.).

As President of **A Plus Settlement Services, Inc.**, I am pleased to provide our company's policies and procedures manual along with copies of the declaration pages from our insurance policies.

We see the practice of adhering to the ALTA Best Practices as integral to our service and ask that you call Vicki Ott at 717-485-9244 with any questions.

Sincerely,

Date: March 25, 2021  
Subject: ALTA Best Practices

We are providing this letter in connection with the ALTA Best Practices and we intend that it be considered by any consumer, mortgage originator or mortgage servicer doing business with our company during the 24-month period following the date of this letter as our promise to follow the procedures outlined in our Best Practices Manual.

**A Plus Settlement Services, Inc.** has implemented the ALTA Title Insurance and Settlement Company Best Practices and as of the date of this letter, we comply with the Best Practices in all material respects.

We represent that, during the 24 month period commencing from the date of this letter, we will remain in material compliance with each of the Best Practices.

Attached to this letter, please find (i) our ALTA Best Practices Manual, and (ii) a copy of the current Declarations Page for our errors and omissions or professional liability insurance.

Sincerely,



\_\_\_\_\_, President

**Vicki L. Ott**

**A Plus Settlement Services, Inc.**

# ALTA Best Practices

A Plus Settlement Services, Inc.  
201 S. Second Street, Ste. 101  
McConnellsburg, PA 17233  
717-485-9244  
Agency website

## Best Practice #1: Licensing

<b>Policy</b>	Document and maintain state mandated insurance licenses and corporate registrations (as applicable) to ensure that A Plus Settlement Services, Inc. (hereinafter the “Company”) remains in good standing with the state(s) in which it operates.
<b>Coverage</b>	These policies and procedures are for all operations of the Company These procedures are to be followed by all employees and independent contractors where applicable.
<b>Procedures</b>	<p><b>Licensing</b></p> <p>The Company maintains the following agency license:</p> <p style="text-align: center;">Licensed Pennsylvania Title Agent License No. 65005 Expires: 8/10/2022</p> <p>The following people personally hold the following professional licenses:</p> <p style="text-align: center;">Vicki L. Ott, Licensed Pennsylvania Title Agent License No. 211779 Expires: 4/30/2023</p> <p style="text-align: center;">Erin Mong, Licensed Pennsylvania Title Agent License No. 852722 Expires: 8/31/2022</p> <p>The following people hold Pennsylvania Notarial Commissions:</p> <p style="text-align: center;">Vicki L. Ott (#1124124 – Exp. 5/3/2024) Stacy L. Crouse (#1283037 - Exp. 4/17/2022) Erin Mong (#1079245 - Exp. 04/29/2021) Jordan Carroll (#1355414 – Exp. 8/15/2023)</p> <p>The Company is a vetted closing professional with Secure Insight, Inc. Registration No. 49310.</p>

	<p>Vicki L. Ott, owner, is a vetted closing professional with Secure Insight, Inc.</p> <p><b>Continuing Education Requirements for licenses:</b></p> <p>Continuing education of 24 hours every 2 years is required by the Commonwealth of Pennsylvania to maintain the title agent licenses referenced above. Each individual licensee is responsible to attend continuing education classes and report hours.</p> <p><b>Continuing Education Requirements for Notary Commissions:</b></p> <p>Continuing education is required by the Commonwealth of Pennsylvania to maintain the notary commissions referenced above. Each individual licensee is responsible to attend continuing education classes and report hours.</p>
	<p><b>We are a member of ALTA (ID 1036992) and do not need a separate ALTA Forms License.</b></p> <p><b>Vicki L. Ott is a member of PLTA (Membership #19119217)</b></p>

<b>Tracking</b>	Vicki Ott is responsible to notify each licensee or notary 60 days in advance of expiration of license or commission. Vicki Ott is also responsible to report to management 30 days prior to expiration of license or commission any license holder or notary who has not completed the renewal process.
<b>Oversight</b>	Vicki Ott is responsible to verify the existence of each license and their timely renewal. In order to verify the existence of the business license she will review the on-line records of the PA Insurance Department. In order to verify the existence of the personal professional licenses she does the same; in order to verify the existence of the Notary commissions she verifies by checking the Court House records where Notary Commissions are required to be recorded.
<b>Training</b>	The Company fully supports employee education and provides necessary time away from the office to meet their educational needs.

<b>Contact Officer</b>	Vicki Ott
<b>Amendment Dates</b>	<i>5/25/2016, 7/5/2016, 4/13/2017, 6/1/2017, 6/7/2018, 8/10/2018, 4/3/2019, 2/7/2020, 5/5/2020, 12/1/2020, 3/25/2021</i>
<b>Date for Next Review</b>	<i>8/1/2021</i>

# ALTA Best Practices

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## Best Practice #2: Escrow Safeguards

<b>Policy</b>	Document and maintain procedures to verify that appropriate and effective escrow controls are in place to meet client and legal requirements for the safeguarding of client funds. These procedures ensure accuracy and minimize the exposure to loss of client funds.
<b>Coverage</b>	These policies and procedures are for all operations of The Company. These procedures are to be followed by all employees and independent contractors where applicable.
<b>Procedures</b>	<p><u>Escrow Account Safeguards:</u></p> <p>Background checks for all new employees has been instituted as of January 1, 2015 and will be repeated every three years, as necessary.</p> <p>Underwriter audit frequency – as required by Underwriter(s) (generally every two years).</p> <p>Check stock is kept locked in a secure location within the company.</p> <p>Titling of accounts: All accounts are to be titled A Plus Settlement Services, Inc. and an identifying name on each account labeling the type of account. (i.e., trust account, operating account, payroll account, recording account, etc.) We currently have four accounts, as follows: “A Plus Settlement Services, Inc., Trust Account” to which all closing funds are deposited; “A Plus Settlement Services, Inc., Recording Account” to which recording funds are transferred from the trust account for all related eRecordings; “A Plus Settlement Services, Inc., Operating Account” to which all fees and non-closing related income is deposited for payment of daily operational expenses of the company; and “A Plus Settlement Services, Inc., Payroll Account” to which funds are transferred from the operating account, as needed, to process payroll and pay payroll taxes for the company.</p>

	<p>Separate escrow and operating accounts – all operating account funds shall be kept separate and apart from the settlement trust funds and escrow funds.</p> <p>Segregation of duties: Due to the fact that we are a very small company with only six (6) employees at the present time, the person who reconciles is a signer on the escrow account. The person responsible for reconciliation off all company accounts is Vicki Ott, who is the owner of the Company.</p> <p>Trial balances are run on each file on a monthly basis and follow-up on all out-of-balance files is completed, as necessary.</p> <p>Documentation is maintained with the monthly reconciliations on all out-of-balance files.</p> <p>Three-way reconciliations are done monthly by Vicki Ott and are completed by the 10<sup>th</sup> of each month.</p> <p>Wire transfers are initiated on-line using a multi-step process through a secure portal provided by the Bank (key fob with randomly changing passwords at 10 second intervals). In addition to the randomly changing passwords, security questions are utilized as an additional layer of security. We receive an email confirmation of the wire initiation and a separate email confirmation once the wire has been processed. Confirmation is received within minutes of the wire being sent. Confirmations are reviewed to make sure that the amounts and payees match.</p> <p>Deposits are made via incoming wire transfers or physical deposit made at the local branch the same day as closing or the next banking day for late afternoon and evening closings. We do not utilize an on-site deposit scanning system.</p> <p>ACH and foreign wire blocks – Foreign wire blocks are in place on all accounts. ACH debit blocks are in place on the trust account.</p> <p>Positive Pay is not currently utilized through our Bank; however, we are utilizing the services of RynohLive. RynohLive is a patented, web-based, “bridge application” that integrates with our escrow accounting software and our online banking (with “read only” capability) to provide escrow and financial security software solutions. RynohLive offers continuous end-to-end account auditing, daily reconciliation, transaction monitoring, anti-fraud algorithms and built-in automated reporting. Key Features of RynohLive include: Automated Positive Pay, Daily three-way reconciliation, Management and tracking of critical disbursements, and Daily monitoring and reporting to key management personnel.</p> <p>Outstanding check list resolution and procedures – All outstanding checks will be reviewed by reconciler on a monthly basis at the time</p>
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	<p>of completion of the reconciliation. All checks that are more than 90 days old will be followed up on by pulling the file and contacting the payee regarding the outstanding check(s).</p> <p>Employees whose employment is terminated either voluntarily or involuntarily are immediately removed from any bank accounts. President will immediately contact the appropriate bank manager to revoke all authorization.</p> <p>Training – All training will be provided by the President of the company, as needed.</p>
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<b>Tracking</b>	<p>Shortages are immediately funded from the operating account. Shortages are usually covered by the Company and are only requested from the customer if they are for things beyond the control of the Company such as revised payoff amounts calculated after the payoff has been remitted or real estate tax payment shortages due to incorrect information from the tax collector. Any recording calculation errors or other minor errors are covered by the Company.</p> <p>Any overages for recording fees, title insurance premiums (due to miscalculation), etc. are refunded to the customer as soon as they are discovered.</p>
<b>Oversight</b>	President is responsible for oversight of all banking operations.
<b>Training</b>	Training – All training will be provided by the President of the company, as needed.

<b>Contact Officer</b>	Vicki Ott
<b>Amendment Dates</b>	<i>7/7/2015, 7/27/2015, 8/15/2015, 3/15/2016, 6/1/2017, 6/7/2018, 12/1/2020</i>
<b>Date for Next Review</b>	<i>8/1/2021</i>

# ALTA Best Practices

A Plus Settlement Services, Inc.

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## Best Practice #3: Written Privacy and Information Security Program to Protect Non-Public Personal Information

<b>Policy</b>	Federal and state laws require title companies to develop a written information security program that describes their procedures to protect non-public customer information. The program must be appropriate to the company's size and complexity, the nature and scope of the company's activities and the sensitivity of the customer information the company handles.
<b>Coverage</b>	These policies and procedures are for all operations of The Company. These procedures are to be followed by all employees and independent contractors where applicable.
<b>Procedures</b>	<p>The Company has consistent practices in place to protect the non-public personal information (NPPI) of consumers which are monitored by management on a regular basis. These procedures are appropriate for the size of the operation and are taken very seriously by all personnel.</p> <p>Upon hiring the Company trains all new employees on the rules and activities required by the Company.</p> <p>The Company provides a copy of its Privacy Policy to all consumers assuring them of the proper use and protection of personal information at the time of closing.</p> <p>The steps the Company takes to protect the NPPI are as follows:</p> <p><b>Physical security of premises</b> - The premises are kept locked during non-working hours and whenever the premises will be unoccupied during working hours. The rear door to the premises is kept locked at all times and only the front-door that opens into our lobby area is unlocked during regular business hours.</p>



**Physical security of files containing NPPI** – Files are kept in filing cabinets and are locked at night and the key secured in a non-public area.

**Clean Desk policy** – Employees are trained and encouraged to maintain a clean-desk policy wherein only the file they are currently working on is out on the desk and is stored in a filing cabinet when stepping away from their desk. Computer screen filters are utilized.

**Network security**

Server has been moved from the physical offices to a cloud-based server provided by SotirIS (704 Lisburn Road, Camp Hill, PA) utilizing a program provided by Citrix.

**Citrix Systems, Inc.** is an American multi-national software company founded in 1989 that provides server, application and desktop virtualization, networking, software-as-a service (SaaS), and cloud computing technologies, including Xen open-source products. Citrix currently services approximately 330,000 organizations worldwide.

SotirIS's hosting environment is behind a firewall and connections in and out are secured by a physical Netscaler appliance. The Netscaler secures the connection to the website and the Citrix/email traffic that comes through it. The servers "live" on what is called a LUN in an SAN, or Storage Area Network device. These LUNs are then replicated, or copied/backed-up nightly to two other SANs and a file level back up is performed by Symantec Backup Exec on other workloads. For redundancy, there are multiple database servers, email servers, Citrix servers as well as multiple Web servers. Critical and Security updates are managed by an "update server" and are deployed and installed regularly to keep them up to date. All equipment in the datacenter is connected to battery backups and supported by a generator. A copy of the SotirISCloud Information Technology Security Policy is available upon request.

Firewall protection and anti-malware intrusion protection is provided by a SonicWall TZ 105W. Protection is renewed annually.

Virus protection on all office computers is provided by Symantec and is renewed annually.

Email encryption is utilized on all outgoing emails via barracuda mail security. In addition, we utilize Citrix ShareFile for all email attachments. Citrix ShareFile allows you to create a password-protected space where you can exchange business files with clients easily and securely.

**Document Storage**

Upon completion of closing, all documents containing NPPI are scanned to the cloud-based server hosted by SotirIS. Physical files

	<p>are kept in locked file cabinets within the offices of the company or in a locked storage facility. Individual storage units are accessible by keyed locks.</p> <p><b>Secure disposal: All-Shred Policy</b> – The Company maintains an all-shred policy wherein all trashed documents are shredded using a cross-cut shredder.</p> <p>The Company utilizes the services of Absolute Document Destruction (ADD) located at 2047 Loop Road, Chambersburg, PA, to provide on-site lockable collection containers, which are picked up as needed and removed for shredding. Documents are shredded using a grinding method, which reduces the document to very small particles of debris. The Company is provided with a Certificate of Destruction for each job. ADD is NAID certified, bonded and insured. All employees of ADD are security screened.</p> <p><b>Disaster management plan</b> – All files are backed-up nightly and maintained at an off-site location maintained by SotirIS.</p> <p><b>Employee background checks</b> - Background checks for all new employees has been instituted as of January 1, 2015 and will be repeated every three years, as necessary.</p> <p><b>Security practices of Independent Searchers and closers</b> – All independent closers shall carry notary E&amp;O insurance in addition to their notary bond. Copies of policy declaration pages shall be maintained on-site. All attorney closers shall carry Professional Liability Insurance. Copies of policy declaration pages shall be maintained on-site. All independent searchers shall carry E&amp;O Insurance. Copies of policy declaration pages shall be maintained on-site.</p>

<b>Tracking</b>	
<b>Oversight</b>	Vicki Ott is responsible to review
<b>Training</b>	All training will be provided by the President.

<b>Contact Officer</b>	Vicki Ott
<b>Amendment Dates</b>	<i>7/7/2015, 10/20/2015, 5/25/2016, 6/7/2018</i>
<b>Date for Next Review</b>	<i>8/1/2021</i>

# ALTA Best Practices

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## Best Practice #4: Proper procedures for document recordation and title and settlement pricing to meet applicable laws.

<b>Policy</b>	Adopting appropriate policies and conducting ongoing employee training can help ensure a real estate settlement company meets state, federal and contractual obligations governing the settlement process and provide a safe and compliant settlement.
<b>Coverage</b>	These policies and procedures are for all operations of The Company. These procedures are to be followed by all employees and independent contractors where applicable.
<b>Procedures</b>	<p><b>Document Recordation Procedures:</b> Documents are sent for recording within 1 business day of closing. If able, the documents are hand-delivered for recording and otherwise are sent via UPS overnight delivery with specific recording instructions. Good relations are maintained with the personnel responsible for recording in each of the Counties that we service so that we are notified immediately of any rejections or other errors that would prevent documents from being recorded in a timely manner.</p> <p>Effective May 5, 2017, the Company registered with <i>Simplifile</i> and on May 24, 2017, the Company registered with <i>CSC</i> to begin electronic recording for all Counties in which electronic recordation is available in order to facilitate quicker recording of all documents.</p> <p><b>Title and Settlement Pricing Procedures:</b> Pennsylvania is a rate-filed State and strict adherence to the applicable title insurance premiums is practiced. In addition, we are careful to only charge for those items which are allowable pass-through charges under the Pennsylvania Insurance Commission rules and regulations.</p>

<b>Tracking</b>	
<b>Oversight</b>	Vicki Ott is responsible to review
<b>Training</b>	All training will be provided by the President.

<b>Contact Officer</b>	Vicki Ott
<b>Amendment Dates</b>	<i>5/8/2017, 6/1/2017</i>
<b>Date for Next Review</b>	<i>8/1/2021</i>

# ALTA Best Practices

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## Best Practice #5: Written Procedures Related to Policy Production, Delivery, Reporting and Premium Remittance

<b>Policy</b>	Appropriate procedures for the production, delivery and remittance of title insurance policies ensures title companies meet their legal and contractual obligations.
<b>Coverage</b>	These policies and procedures are for all operations of The Company. These procedures are to be followed by all employees and independent contractors where applicable.
<b>Procedures</b>	<p><b>Policy production and Delivery procedures:</b> Final title insurance policies are issued within 30 days of recordation and mailed to the Lender at the address contained in the written closing instructions. Owner's title insurance policies are mailed to the Buyer's home address.</p> <p><b>Policy reporting and Remittance procedures:</b> Policies are reported and premiums remitted to the title insurance underwriter on a monthly basis. Every attempt is made to have this completed by the 15<sup>th</sup> of the month.</p>

<b>Tracking</b>	
<b>Oversight</b>	Vicki Ott is responsible to review
<b>Training</b>	All training will be provided by the President.

<b>Contact Officer</b>	Vicki Ott
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<b>Amendment Dates</b>	
<b>Date for Next Review</b>	<i>8/1/2021</i>

# ALTA Best Practices

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## Best Practice #6: Maintain appropriate professional liability insurance, fidelity and surety bond coverages.

<b>Policy</b>	Appropriate levels of professional liability insurance ensure that title agencies and settlement companies have the financial capacity to stand behind their professional services. Meeting state and contractual requirements
<b>Coverage</b>	These policies and procedures are for all operations of the Company. These procedures are to be followed by all employees and independent contractors where applicable.
<b>Procedures</b>	<p>The Company maintains professional liability coverages in accordance with its agency contract(s) and applicable state licensing laws.</p> <p><b>Errors and Omission Coverage:</b> The Company maintains a policy with Underwriters at Lloyd's London with coverage amounts of \$1,000,000.00/\$1,000,000.00. The deductible for each incident is \$5,000.00.</p> <p><b>Escrow Security (Fidelity) Bond Coverage:</b> The Company maintains an Escrow Security Bond policy with Underwriters at Lloyd's London in the amount of \$250,000.00. The deductible for each incident is \$5,000.00. This bond contains a rider for Computer Crimes coverage for loss directly related to computer hacking or fraudulent wire transfers.</p> <p><b>Surety Bond Coverage:</b> The Company maintains a Surety Bond policy with Liberty Mutual Insurance Company in the amount of \$100,000.00.</p>

	<p><b>Cyber Liability Coverage:</b> The Company maintains Beazley Breach Response Cyber Liability coverage with a coverage amount of \$1,000,000.00/aggregate. The deductible for each incident is \$1,000.00. Includes: Information Security and Privacy Liability; Regulatory Defense and Penalties; Website Media Content Liability; and PCI Fines, Expenses and Costs. A copy of the policy is available upon request.</p> <p><b>Independent third party searchers and closers:</b> If the Company utilizes the services of an independent search company or searcher a copy of his/her/its professional liability insurance policy is obtained and reviewed prior to engagement.</p> <p>If the Company utilizes the services of an independent closing company or individual notary to conduct closings a copy of his/her/its professional liability insurance policy is obtained and reviewed prior to engagement.</p>

<b>Tracking</b>	Vicki Ott is responsible to renew all policies 30-60 days prior to expiration.
<b>Oversight</b>	Vicki Ott is responsible to review.

<b>Contact Officer</b>	Vicki Ott
<b>Amendment Dates</b>	<i>5/25/2016, 6/7/2018, 5/5/2020</i>
<b>Date for Next Review</b>	<i>8/1/2021</i>



# ALTA Best Practices

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## Best Practice #7: Maintain procedures for resolving consumer complaints.

<b>Policy</b>	A process for receiving and addressing consumer complaints is important to ensure that any instances of poor service or non-compliance do not go undiscovered.
<b>Coverage</b>	These policies and procedures are for all operations of The Company. These procedures are to be followed by all employees and independent contractors where applicable.
<b>Procedures</b>	<p>The Company takes consumer satisfaction very seriously and addresses all consumer issues immediately and with great care. All employees are responsible for promptly and seriously addressing any complaint made by a customer against A Plus Settlement Services, Inc. or its employees. Employees receiving a communication from a customer (via phone, fax, email or in person) with a complaint must:</p> <ul style="list-style-type: none"><li>- Remain courteous at all times and, under all circumstances, refrain from engaging in argumentative behavior with the customer, regardless of the nature of the complaint or the conduct of the customer;</li><li>- Completely and accurately document information pertinent to the complaint in writing;</li><li>- Escalate the complaint to the President, if it becomes clear that the customer wishes to pursue a formal complaint or the employee feels unable to further assist the customer;</li><li>- Not confirm, discuss or reveal the borrower's specific information without confirmation of the caller's identity as the borrower in question and written authorization on file. (Federal law prohibits the release of borrower-specific information to anyone without: the borrower's expressed, written authorization or order of a court of competent jurisdiction.)</li></ul> <p>All formal complaints against A Plus Settlement Services, Inc. or its employees must be documented using the A Plus Settlement Services, Inc. Customer Complaint Form provided by the Company.</p>

	<p>Failure to adhere to all requirements stipulated in this policy and all related documents may result in disciplinary actions, up to and including termination.</p> <p>A Plus Settlement Services, Inc. has voluntarily adopted this policy for its sole and exclusive use. This policy and all related documents will be reviewed annually or as needed based on prevailing business conditions.</p>

<b>Oversight</b>	Vicki Ott is responsible to review
<b>Training</b>	All training will be provided by the President.

<b>Contact Officer</b>	Vicki Ott
<b>Amendment Dates</b>	
<b>Date for Next Review</b>	<i>8/1/2021</i>