

## FRAUD POLICY

Family Services, Inc. DBA Origin SC (the Company) is committed to preventing, identifying, and reporting any fraudulent activity related to the Company's services, activities and administration of grants. Fraud may include but is not limited to false statements provided by or to staff, contractors, clients, beneficiaries and stakeholders. Fraudulent activities may include but are not limited to knowingly misrepresenting income or expenses, assisting or counseling anyone to misrepresent facts or circumstances related to eligibility for programs or benefits, bribery, kickbacks, theft or embezzlement, forgery or alteration of documents, destruction or concealment of records, profiting from insider knowledge, or a conflict of interest. The Company will investigate any reports of fraud. The Company reserves the right to involve law enforcement authorities in its investigation. Any documented fraudulent activity may result in administrative or criminal action being taken against those involved including termination from any program sponsored by the Company or termination from employment by the Company. The Company will not retaliate against any party who reports fraud, criminal activities or other program irregularities. Any suspected fraudulent activity should be reported to the Company's currently appointed Risk Manager with sufficient specificity to facilitate an investigation.

## PRIVACY POLICY

Our agency is committed to assuring the privacy of individuals and/or families who have contacted us for assistance. We realize that the concerns you bring us are highly personal in nature. We assure you that all information shared both orally and in writing will be managed within legal and ethical considerations. The following are examples of how this data may be used:

### ALL CLIENTS

1. To assist us in our work with you, our staff may seek supervision/consultation with professional colleagues within the agency and, where appropriate and necessary, with other resources in the community.
2. For the purpose of evaluating our services, gathering valuable research information and designing future programs, we may report case file information to various grantors and stakeholders.

### COUNSELING ONLY

3. For counseling only clients, we will confirm with your creditors if asked:
  - a. Verification of appointment
  - b. Date of counseling
  - c. Disposition: i.e.,
    - 1) Client will handle affairs on their own
    - 2) Pending action

### MORTGAGE DEFAULT/DEBT MANAGEMENT

4. For clients needing our intervention on your behalf through Mortgage Default or Debt Management, we will disclose the following information to your lender/creditors:
  - Your address and home phone number, if published
  - Total debt information
  - Income, net and gross
  - Living expenses
  - A list of your creditors
  - Personal information concerning your financial circumstances, but not lifestyle or personal habits
  - Place of employment will be verified only
5. We collect nonpublic personal information about you from the following sources:
  - Information we received from you on our applications or other forms you provide
  - Information about your transactions with us, your creditors, or others, and
  - Information we receive from a credit reporting agency

In all other situations, your information may be released to appropriate individuals or agencies **ONLY UPON YOUR SIGNATURE BELOW PERMITTING US TO DO SO, OR when our staff has been served by a valid subpoena.**

The following **PRIVACY POLICIES** detail circumstances under which we will release your information to a third party:

6. We may disclose some or all of the information that we collect, as described below, to creditors, or third parties who need this information in order for us to assist you after a counseling session. Information includes but is not limited to:
  - Information we receive from your applications or other forms, such as your name, address, social security number, assets, and income
  - Information about your transactions with us, your creditors, or others, such as your account balance, payment history, parties to transactions and credit card usage
  - Information we receive from a credit reporting agency, such as your credit history



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7. We may disclose all of the information that we collect, as described above, to creditors and related financial institutions who need this information in order to put you on a debt management plan (DMP) or mortgage workout.
8. We restrict access to nonpublic personal information about you to those employees who need to know that information to provide services to you. We maintain physical, electronic, and procedural safeguards that comply with federal regulations to guard your nonpublic personal information.  
However, several of our grantors require that we provide some nonpublic information about you in order to provide proof of counseling services provided and outcomes achieved.
9. **Unless earlier revoked by client, this authorization will expire one year from the date signed.** However, I/We give permission to ORIGIN, their grantors/stakeholders and their representative agents to follow-up with me as necessary for purposes of program compliance and/or evaluation.

**By signing below, I/we agree that I/we have read and understand the Origin Privacy Policy and understand my nonpublic information may be released to appropriate individuals or agencies as necessary to assist me.**

**AFFILIATED BUSINESS ARRANGEMENT DISCLOSURE**

Origin Realty, Inc. is a for-profit wholly owned subsidiary of Origin. Additionally, Origin, a non-profit 501(c)(3) organization, has several nonprofit divisions doing business as Financial Education & Coaching (FEC), Homeownership Promotion & Preservation (HPP), Family Violence Intervention (FVIP), Housing Stability, and Conservator Services. Origin Realty, Inc. provides real estate brokerage services for which it and its licensed real estate agents typically earn a commission. Origin SC provides various counseling, granting, lending and educational services for free or for cost of service fees.

Set forth below is the estimated charge or range of charges for the settlement services listed. Origin will NOT require you to use the services of Origin Realty or any affiliates as a condition for its services.

Origin Realty, Inc. will NOT require you to use the services of Origin SC as a condition of its brokerage services. **THERE ARE FREQUENTLY OTHER SETTLEMENT SERVICE PROVIDERS AVAILABLE WITH SIMILAR SERVICES. YOU ARE FREE TO SHOP AROUND TO DETERMINE THAT YOU ARE RECEIVING THE BEST SERVICES AND THE BEST RATE FOR THESE SERVICES.**

<u>Provider/Partner</u>	<u>Settlement Service</u>	<u>Charge or Range of Charges</u>
Origin SC- Homeownership Dept.	Homebuyer Education and Counseling One-on-One Counseling	\$0 to \$199 paid for at time of initial counseling
Origin SC- Homeownership Dept.	Credit and Financial Counseling	Free or monthly \$30
Origin SC - Housing Stability & Conservator Dept.	-	Free per court and government approved sliding scale
Origin SC - Family Violence Intervention Dept.	Anger Mgmt., Domestic Violence Counseling	\$0 to \$65 per session
Origin SC – Lending Dept.	Mortgage Lending	Legally allowed fees and/or interest. All loans must pass High Cost Mortgage Testing
Origin SC – Lending Dept.: Borrowers Supportive Services	Mortgage Lending	\$99 paid at time of initial intake
Origin SC – Lending Dept./First Citizens (FC)	Loan Servicing	No charge to borrower for servicing. If payment is more than 15 days late, charge will be 4% of loan payment amount past due
Origin SC – Lending Dept./NeighborWorks America	Ref: NeighborhoodLIFT Approved Lenders List	\$0 to \$285 paid at closing, 0% interest forgivable loans
Origin Lending Dept./Community Loan Center of America (CLC)	Small Dollar Lending Program	\$20 loan administrative fee plus 18% interest
Origin Realty	Real Estate Brokerage	Real Estate Sales Commission and or fees
Origin Realty	Real Estate Brokerage	Administration fee up to \$350
Neighborhood Revitalization LLC	Development	Buyer's purchase price



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**Fee Waiver Policy**

The agency's policy with regard to the availability of services for free or at a reduced rate based on a client's ability to pay: Origin SC makes our services available to consumers who are experiencing financial difficulties. Counseling is provided to all persons regardless of religion, sex, race, national origin, or the ability to pay, etc. For all households that are at/or below 150% of the Federal Poverty Guidelines published by the US Department of Health & Human Services (DHHS) are eligible for a fee waiver or fee reduction. This determination will be made by the bankruptcy coordinator when household income and size are provided on our Counseling Application. During the follow up or counseling appointment, the coordinator will notify those who are eligible, and clients will have to provide income documentation to the bankruptcy coordinator, such as Social Security award letters, pay stubs, tax returns, etc.

I/We give permission to Origin Realty, Inc. to provide a copy of my/our HUD closing statement to Origin for statistical reporting purposes.

I/we have read this Disclosure, and understand that if Origin Realty, Inc. is referring me/us to Origin and/or if Origin is referring me/us to Origin Realty Inc. to purchase the above-described settlement service(s) and they may receive a financial or other benefit as the result of this referral.

*I understand that a copy of the Origin, privacy policy will be made available to me for viewing upon request.*

The Affiliated Business Arrangement Disclosure portion of this form is prepared and provided in compliance RESPA Section 8(c)(4). If you have questions or concerns you may direct them to: Caprice Atterbury, Origin 8084 Rivers Ave, Suite 100, N. Charleston, SC, 29406 Phone: 843 628 5004.

**By signing below, I/we agree that I/we have read, understand and agree to all contract provisions, authorizations and disclosures listed above (page 1 and page 2).**

Client Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Client Signature: \_\_\_\_\_ Date: \_\_\_\_\_

\_\_\_\_\_ It has been explained to me/us by my Home Purchase/Credit Advisor that I/we may choose any lender or real estate agent of my/our choice to complete my/our home purchase transaction.

\_\_\_\_\_ I/We give permission for my /our closing attorney, loan officer, or real estate agent to provide a copy of my/our signed Hud-1 Settlement Statement to Origin Realty Inc. upon the closing of my mortgage.

## Statement of Counseling/Education Services

Please read the following statements carefully so that you will understand the procedures for your session. Our hours of operation are 8:00 am – 5:00 pm, Monday – Friday. Appointments are available some late evenings. Please call for dates and times. Classes for Bankruptcy and Financial Education courses are available – please call for next class date and time.

**Please read each statement below and sign that you have read and understand the provided information.**

I understand Origin SC will provide a confidential, comprehensive, personal money management interview and/or class.

I understand that a Certified Consumer Credit Counselor or a qualified professional counselor will conduct the interview and/or class. The National Foundation for Credit Counseling (NFCC) and the South Carolina Department of Consumer Affairs certifies all Origin SC credit counselors.

I understand that I will be issued a certificate upon completion of any course for financial education training, pre-filing for bankruptcy counseling, and post-filing bankruptcy debtor education course required by law, provided by Origin SC. These courses are offered regardless of the participant's ability to pay. Origin SC does not pay or receive fees or other considerations for the referral of clients for pre-filing counseling or debtor's education classes.

I understand that in the event that we are dissatisfied, we can utilize the **Complaint Resolution Process**.

I understand that Origin SC has a "3 strike" policy in regards to client contact. If they attempt to contact me three times without any success, my case will be closed out.

I understand that most of Origin SC's funding comes from voluntary contributions from creditors who participate in *Debt Management Plans* (DMP). Since creditors have a financial interest in getting paid, most are willing to make a contribution to help fund our agency. These contributions are usually calculated as a percentage of the payments I make through my DMP—up to 15% of each payment received. However, my accounts with my creditors will always be credited with 100% of the amount that I pay through Origin SC and Origin SC will work with all my creditors regardless of whether they contribute to the agency. Other funding comes from fees paid by clients for services rendered.

I will be given an assessment outlining a suggested client action plan, which will be based on the following options:

- Credit counseling services are not suitable for all consumers and that consumers may request information about other ways, including bankruptcy, to deal with indebtedness; and
- Debt management services offered by the provider do not include secured debt, such as mortgages, auto/boat loans, most student loans, child support payments and alimony payments.
- I will handle my creditors directly.
- I may choose to enroll in a DMP Program. Your DMP serves the dual role of helping me repay my debts and helping creditors to receive the money owed to them. My participation in a DMP will not change anything that is already on my credit report. If my credit report reflects that I have paid creditors as agreed in the past, a DMP could have a negative impact on creditworthiness decisions by potential creditors, landlords or employers in the future. In



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addition, creditors may report that I am on a DMP and am not paying as originally agreed although they have accepted the reduced payment. Origin SC has no responsibility or obligation for any past, present or future credit ratings assigned to me by my creditors.

- In the event that a counselor suggests a DMP, I will receive complete details of the operations, requirements and responsibilities. I will be referred to additional services of Origin SC or other agencies that may be able to assist with particular problems that have been identified.

### Client Bill of Rights

#### WE PLEDGE THAT OUR CLIENTS HAVE THE RIGHT TO:

- Prompt counseling services for managing money based on their financial situation
- Treatment with dignity and respect
- Be actively involved in a comprehensive assessment of their financial situation including an appropriate action plan
- Express dissatisfaction through a Complaint Resolution Process
- Discontinue their relationship with our agency at any time
- Ask questions and to have concerns addressed

### Complaint Resolution Process

We are committed to providing you with high-quality professional services. However, if you are not satisfied with the services provided or if you want to make a complaint, we ask that you follow these guidelines.

1. Try to solve the issue with the staff member involved by giving him or her specific information about your complaint.
2. If step one is not possible, or the issue is not resolved to your satisfaction, write or call the Program Director.
3. The agency may request a meeting with you by phone or face-to-face or seek more information from a staff person. The agency will respond within 15 days.
4. If your issue is still unresolved, you may appeal in writing directly to the Chief Executive Officer of the agency. After additional fact finding, this individual will provide a concluding decision to you within 15 days.
5. If you have any complaints about the credit counseling services received, you may contact the South Carolina Department of Consumer Affairs at 1-800-922-1594 (toll free in S.C.) or 803-734-4200.

### Non-discrimination Policy

Our agency serves all members of the community. We do not engage in the practices of discrimination in the selection and participation of clients in our programs or services with respect to race, religion, gender, national origin, handicap or the ability to pay.

Applicant \_\_\_\_\_  
*Please print name*
*Please sign name*
*Date*

Co-Applicant \_\_\_\_\_  
*Please print name*
*Please sign name*
*Date*

Counselor \_\_\_\_\_  
*Please print name*
*Please sign name*
*Date*