



Escrow Account Management Compliance Checklist (Auditing, security)

Escrow Account Setup & Authorization

Verifies proper account creation, authorized signatories, and delegation of authority.

Escrow Account Number

Financial Institution Name

- ☐ Bank of America
- ☐ Wells Fargo
- ☐ Chase
- ☐ Other - Please Specify

Description of Escrow Account Purpose (e.g., Property Taxes, Insurance)

Escrow Account Opening Date


Authorized Signatories

- ☐ Signatory 1
- ☐ Signatory 2
- ☐ Signatory 3

Primary Signatory Authorization Level

- ☐ Full Authorization
- ☐ Limited Authorization - Specify Limits

Copy of Authorized Signatory Documentation (e.g., Power of Attorney)

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Specific Authorization Limits for Each Signatory (if applicable)

Write something...


Client Identification & Verification (CIP)

Ensures adherence to Customer Identification Program (CIP) requirements for all parties involved.

CIP Method Used?

- ☐ Knowledge-Based Authentication
- ☐ Identity Proofing
- ☐ Non-Credible Data Sources

Copy of Government-Issued Photo ID (e.g., Driver's License, Passport)

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Detailed Notes on Identity Verification Process

Write something...

Social Security Number (SSN) Verification Method (if applicable)

Enter a number...

Address Verification Method Used?

- ☐ Utility Bill
- ☐ Bank Statement
- ☐ Credit Report
- ☐ Other (Specify in Long Text)

Details of Address Verification (If Not Standard Document)

Write something...

Date of CIP Verification Completion

Enter date...

Client Type?

- ☐ Individual
- ☐ Business Entity

Funds Handling & Disbursements

Covers processes related to receipt, safekeeping, and disbursement of escrow funds.

Maximum Daily Disbursement Limit Per Transaction

Enter a number...

Disbursement Approval Workflow (e.g., Single Signatory, Dual Control)

- ☐ Single Signatory
- ☐ Dual Control
- ☐ Tiered Approval Levels

Last Review Date of Disbursement Authority Matrix

Enter date...

Description of Procedures for Handling Returned Checks/Payments

Write something...

Methods Used to Verify Beneficiary Account Information (Select all that apply)

- ☐ MICR Matching
- ☐ Independent Verification Services
- ☐ Direct Confirmation with Beneficiary's Bank
- ☐ Physical Copy of Voided Check

Method for Reconciling Escrow Accounts

- ☐ Automated Reconciliation Software
- ☐ Manual Reconciliation
- ☐ Hybrid Approach

Frequency of Escrow Account Reconciliation

Enter a number...

Recordkeeping & Documentation

Focuses on maintaining accurate, complete, and accessible records of all transactions.

Date of Initial Escrow Agreement

Enter date...


Description of Escrow Agreement Terms

Write something...

Initial Escrow Account Balance

Enter a number...

Copy of Signed Escrow Agreement

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Summary of Relevant Amendments to the Escrow Agreement

Write something...

Types of Documents Retained (check all that apply)

- ☐ Payoff Statements
- ☐ Title Reports
- ☐ Insurance Policies
- ☐ Tax Records
- ☐ Correspondence
- ☐ Other (Specify in Long Text)

Number of Years Records Retained

Enter a number...

Description of Document Storage Method (e.g., Physical, Electronic, Cloud)

Write something...

Audit Trail & Transaction Verification

Addresses the ability to track and verify all activity within the escrow accounts.

Number of Unique User Logins Reviewed for Audit Trail

Enter a number...

Summary of Audit Trail Review Findings (e.g., anomalies, unauthorized access attempts)

Write something...

Date of Last Full Audit Trail Review

Enter date...

Audit Trail System: is the audit trail comprehensive and tamper-proof?

☐ Yes

☐ No

☐ N/A

Transaction Types Included in Audit Trail

☐ Deposit

☐ Withdrawal


☐ Transfer

☐ Fee Assessment

☐ Interest Payment

☐ Reconciliation

Sample Audit Trail Log File (for review)

 Upload File

Verification of Funds Disbursement: Are Funds Disbursement processes and authorization clearly documented and verifiable through the audit trail?

☐ Yes

☐ No

☐ N/A

Security Controls - Access & Authentication

Covers security measures related to user access, passwords, and multi-factor authentication.

Multi-Factor Authentication (MFA) Enabled?

☐ Yes

☐ No

☐ Partial - Some Users

Password Complexity Requirements Enforced?

☐ Yes

☐ No

☐ Partial - Some Systems

Minimum Password Age (in days)

Enter a number...

Access Review Frequency

- ☐ Quarterly
- ☐ Semi-Annually
- ☐ Annually
- ☐ Ad-hoc

Summary of User Access Review Process

Write something...

Privileged Account Management System in place?

- ☐ Yes
- ☐ No
- ☐ In Progress

Last Password Policy Review Date

Enter date...

Authentication methods supported for remote access?

- ☐ VPN
- ☐ Remote Desktop Protocol (RDP)
- ☐ Web-based Portal
- ☐ Other (specify in Long Text)

Security Controls - Data Encryption & Protection

Focuses on protecting sensitive data at rest and in transit through encryption and other security protocols.

Encryption Method for Data at Rest:

- ☐ AES-256
- ☐ Triple DES
- ☐ Other (Specify in LONG_TEXT)

Encryption Method for Data in Transit:

- ☐ TLS 1.3
- ☐ TLS 1.2
- ☐ SSL 3.0 (Not Recommended)

Detailed Description of Data Encryption Key Management Procedures:

Write something...

Data Loss Prevention (DLP) Measures in Place?

- ☐ Yes
- ☐ No
- ☐ In Progress

Frequency of Data Encryption Key Rotation (in days):

Enter a number...

Firewall Protection in Place?

- ☐ Yes
- ☐ No
- ☐ In Progress

Description of Vulnerability Scanning and Penetration Testing Procedures:

Write something...

Latest Penetration Testing Report (PDF)

 Upload File

Business Continuity & Disaster Recovery

Ensures plans are in place to maintain escrow services during disruptions.

Last Disaster Recovery Drill Frequency (in months)

Enter a number...

Date of Last Business Continuity Plan Review

Enter date...

Brief Description of Business Continuity Plan Highlights

Write something...

Critical Systems Included in Disaster Recovery Plan (Select all that apply)

- ☐ Escrow Software
- ☐ Email Server
- ☐ Accounting System
- ☐ Communication Systems (Phone, Internet)
- ☐ Document Storage (Cloud or On-Site)

Backup Location Type

- ☐ Offsite Cloud Storage
- ☐ Secondary Physical Location
- ☐ Hybrid (Cloud & Physical)
- ☐ Not Applicable

Copy of Current Business Continuity Plan (BCP)

 Upload File

Describe Communication Plan for Alerting Key Personnel in Case of Disaster

Write something...

Is a Succession Plan in place for Key Personnel?

- ☐ Yes
- ☐ No
- ☐ Pending

Regulatory Compliance (Federal & State)

Covers adherence to relevant laws and regulations related to escrow accounts, including but not limited to RESPA, SAFE Act, and state-specific requirements.

Are you registered with the state's Escrow Regulatory Agency?

- ☐ Yes
- ☐ No
- ☐ N/A - Not Required

Date of last state escrow regulatory agency examination:

Enter date...

Exam Score (if applicable):

Enter a number...

Summary of any findings from last examination (if applicable):

Write something...

Are you complying with the Secure Affordable Financial Transactions Act (SAFE Act)?

- ☐ Yes
- ☐ No
- ☐ N/A

Do you adhere to the Real Estate Settlement Procedures Act (RESPA)?

- ☐ Yes
- ☐ No
- ☐ N/A

Which state-specific escrow regulations apply to your operations?

- ☐ California Escrow Law
- ☐ Florida Escrow Regulations
- ☐ Texas Escrow Laws
- ☐ New York Escrow Rules
- ☐ Other (Specify in Long Text)

Specify Other State-Specific Regulations (if 'Other' was selected above):

Write something...

Training & Competency

Verifies that escrow personnel are adequately trained and competent in their roles.

Which core escrow processes has the employee completed training on?

- ☐ Funds Receipt & Processing
- ☐ Disbursement Procedures
- ☐ Client Identification (CIP)
- ☐ Document Management
- ☐ Closing Procedure Adherence
- ☐ Security Protocols

Date of last escrow compliance training.

Enter date...

Number of years of experience in escrow operations.

Enter a number...

Describe the content of the escrow compliance training.

Write something...

What level of proficiency does the employee demonstrate in performing key escrow tasks?

- ☐ Expert
- ☐ Proficient
- ☐ Developing
- ☐ Needs Improvement

Upload copy of training certificate/proof of completion.

 Upload File

Date of next scheduled refresher training.

Enter date...