



Compliance and Risk Solutions for Fintechs and Bank Partners

CrossCheck provides support to fintech companies and their bank partners at every stage to build compliance and risk infrastructure, close internal control gaps, anticipate examiner priorities, and align with industry standards. Our approach enables fintechs to implement an effective and adaptable compliance program, allowing them to scale with confidence while preserving customer and bank partner trust.

Our Service Offerings

-  **Compliance Management System (CMS) Audits**
Our consultants conduct independent audits of the CMS, testing controls and processes against bank partner requirements and Federal regulations. Our reviews span detailed CMS program assessments and incorporate operational implementation and transactional testing of lending and deposit regulations including consideration of Unfair, Deceptive, or Abusive Acts or Practices (UDAAP).
-  **Product and Market Readiness**
Our consultants also work with fintechs on new product development and market expansion, reviewing program design, workflows, and control frameworks to identify regulatory vulnerabilities and make actionable recommendations. We develop compliance roadmaps, test prototypes under real-world scenarios, and develop policies and procedures to achieve and demonstrate compliance.
-  **Internal Audit Development**
CrossCheck can execute part or all of a company's operational and compliance internal audit plan, design the audit function, conduct an enterprise-wide risk assessment, and develop a risk-based internal audit plan. Our consultants identify control gaps and their root cause, recommend improvements to mitigate risks, follow up on prior remediation efforts, and provide ongoing guidance to support defensible processes.
-  **Executing Internal Audits**
Our team conducts audits on compliance, operations, accounting, secondary marketing, and third-party/vendor management. Through policy review, personnel interviews, and compliance/operational assessments, we evaluate the completeness of existing procedures and the effectiveness of related controls.
-  **Anti-Money Laundering (AML)/Countering the Financing of Terrorism (CFT) Audits**
For bank partners and their sponsored fintechs, we conduct independent third-party audits that examine the AML/CFT program including the customer information program (CIP), Customer Due Diligence (CDD)/Enhanced Due Diligence (EDD), suspicious activity monitoring, sanctions screening, and transaction testing with detailed recommendations aligned with applicable standards outlined in the Federal Financial Institutions Examination Council (FFIEC) Examination Manual, bank partner requirements and current enforcement practices.
-  **Tailored Training**
CrossCheck delivers targeted training programs to boards, senior management, and staff on compliance, AML/CFT, fair lending, and other priority topics to understand regulatory and bank partner expectations, as well as emerging risks and best practices.
-  **Fair Lending Performance Analysis and Program Assessment**
Our team of data scientists conduct performance analysis that includes statistical analysis and comparative file review. Our fair lending program assessments identify control gaps in the fair lending compliance program and provide recommendations for enhancement.
-  **AI Model Monitoring and Output Testing**
CrossCheck assesses AI-driven lending models for fair lending performance and potential disparate impacts. Our consultants analyze model outputs against traditional underwriting to evaluate sources of variance and support explainability at each stage of the decisioning process.



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Representative Engagements

Compliance Program Review

Conducted hundreds of independent CMS audits. Evaluated compliance frameworks for numerous fintechs and their bank partners across a range of products, including consumer lending, small business financing, mortgages, student lending, point-of-sale, and BNPL.

Multi-State Product Launch Support

Coordinated the review of a fintech company's home equity line of credit (HELOC) program documentation, sourcing counsel in 48 states with the expertise to perform state-specific reviews. CrossCheck led a streamlined process that allowed the client to quickly and cost-effectively roll out its program nationwide.

Policies and Procedures Development

Developed and strengthened compliance policies and procedures of various fintech companies, enabling them to strengthen governance and internal controls, while deterring future regulatory issues.

Post Remediation Testing

Performed testing of consumer remediation completed by a bank's fintech lending partner to confirm that remediated amounts were accurately calculated. The engagement also included verification that remediation payments were delivered to affected consumers.

Fair Lending Performance Analysis

Assisted a fintech company in evaluating its fair lending performance covering its unsecured consumer loan product on behalf of its two originating bank partners. At the company's request, CrossCheck consultants completed comparative file reviews of the files identified with statistically significant disparities.

Clients CrossCheck Serves

We work with a range of fintechs and their bank partners, including those offering:

- ✓ Lending and credit products, including Buy Now Pay Later (BNPL) programs
- ✓ Deposit products
- ✓ Payments services
- ✓ Digital banking and Banking as a Service (BaaS) platforms

Our People

Our team combines decades of practitioner experience as compliance officers, examiners, internal auditors, regulatory attorneys, and underwriters with the industry's most trusted credentials, including CRCM, CAMS, CIA®, CISA, and CRMA. Having partnered with fintechs at every stage of growth, we anticipate what's ahead, eliminate the guesswork, and solve problems as if they were our own.

Resources and Insights

From regulatory changes to hands-on guidance, our team regularly shares insights on the latest developments in compliance, risk, and internal audit. Recent articles include:

- *Best Practices for Choosing a Fintech Lending Partner*
- *Fair Lending Risk in AI Credit Models: A Compliance Framework*
- *Risk Management of Third-Party Relationships*
- *How to Help Your Fintech Partners Develop a Compliance Roadmap*
- *AI, Fraud, and the Future of Mortgage Risk Management*

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