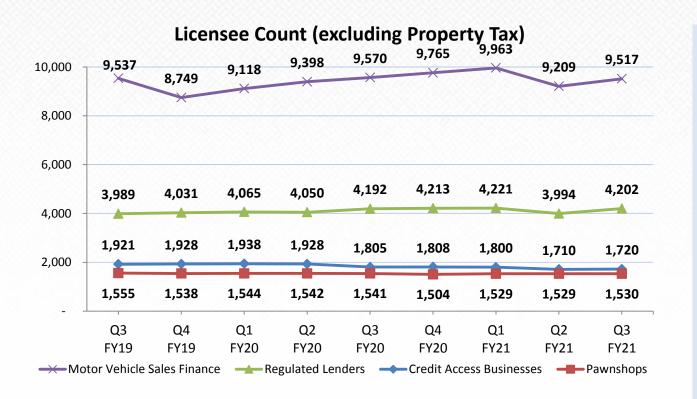


Texas Consumer Installment Loan Data Trends

Preliminary 2020 data (as of 6/30/2021)



Licensee Volume



The first renewal cycles during COVID-19 did not affect branch and store license numbers.

Consumer lending volume did decrease for most industries.

Loan origination in the Payday and Title (CAB) industry was down 30% in 2020.

Current 342-F data indicates a 10-15% decline.

Data as of end of Q3 2021 (5/31/2021)



Economic Forecasts & Trends

Leading Indicators

Consumer Confidence Index increased 7.3 points (May to June)

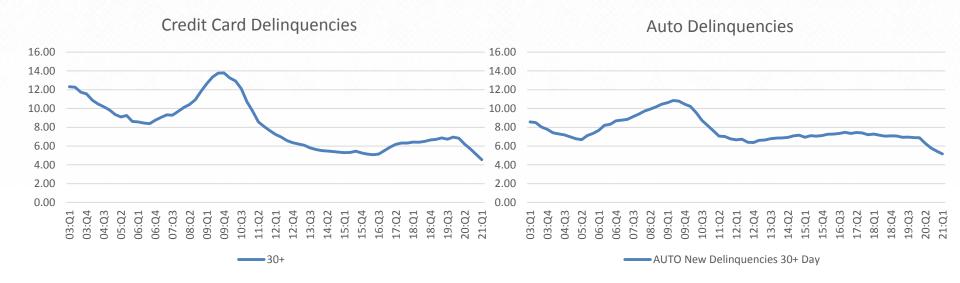
Residential Building Permits decreased 5.1% (May to June) indicated supply and labor shortages continue.

Lagging Indicators

GDP increased at an annual rate of 6.4%(Q4 2020 to Q1 2021)

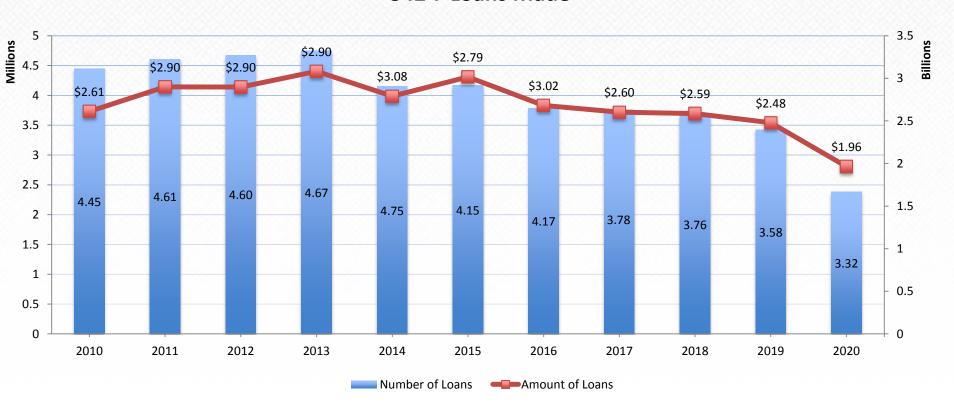
Unemployment Rate slightly increased 10 basis points to 5.9% (May to June)

National Credit Delinquencies



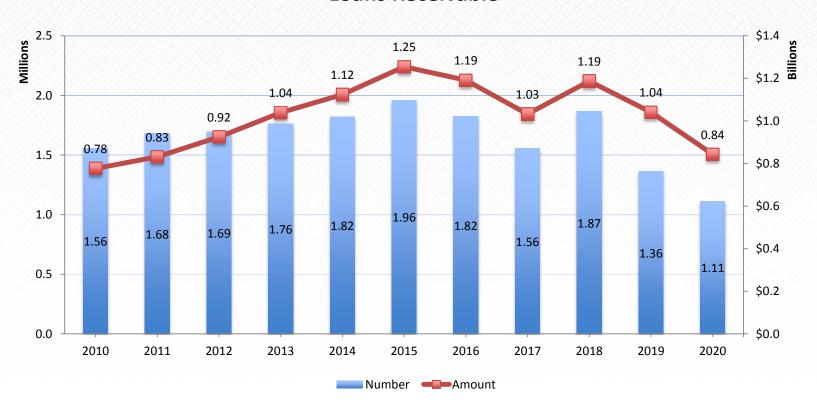


342-F Loans Made





Loans Receivable







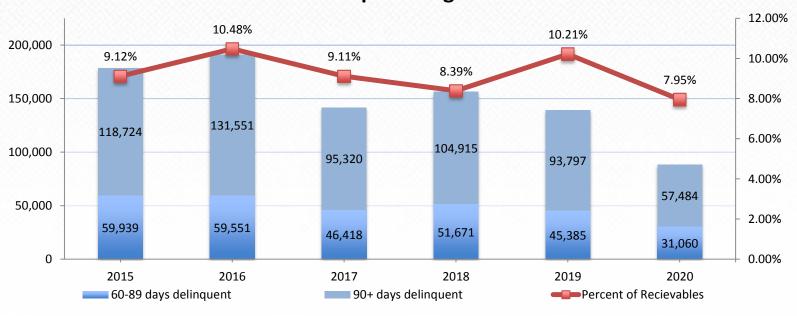
Average Amounts



^{*}Preliminary data through 6/30/2021

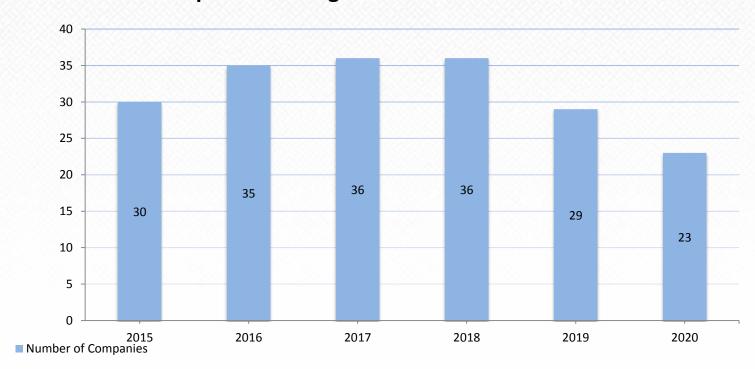


Number of Delinquent Regulated Loans*

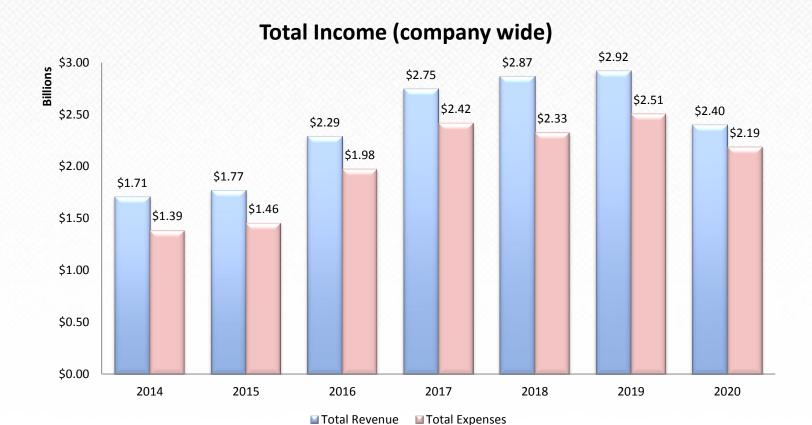




Companies making both 342-F and 342-E Loans





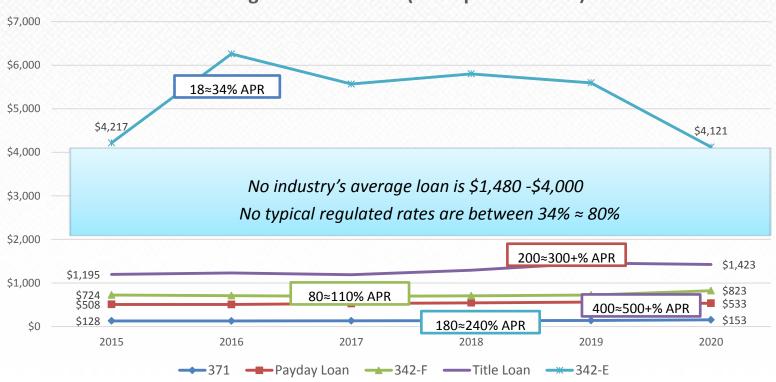


^{*}Data as of 6-30-2021. Includes income and expenses from all business activity.



Average Amounts and Rates of Texas Licensed Lenders

Average Loan Amounts (All Reported Loans)



^{**}Preliminary Data collected through 6/30/21

Compliance Management System

Why yours is important (even if you didn't know you had one)





A CMS is how an institution:

- Establishes its compliance responsibilities;
- Communicates those responsibilities to employees;
- Ensures that responsibilities for meeting legal requirements and internal policies and procedures are incorporated into business processes;
- Reviews operations to ensure responsibilities are carried out and legal requirements are met; and
- Takes corrective actions and updates tools, systems, and materials as necessary.



A strong CMS begins with the principal parties of an organization (owners, general partners, directors, officers, and voting members of limited liability companies). The oversight of and commitment of the licensee to the CMS will:

- Demonstrate a strong commitment and oversight to the licensee's CMS;
- Provide compliance resources including systems, capital, and human resources commensurate with the licensee's size, complexity, and risk profile;
- Ensure that staff is knowledgeable, empowered and held accountable for compliance with Texas and federal consumer credit financial laws related to the activities regulated by the OCCC;



- Conduct comprehensive and ongoing due diligence and oversight of service providers;
- Exercise oversight of service providers' policies, procedures, internal controls, and training to ensure consistent oversight of compliance responsibilities;
- Respond promptly and effectively to changes in Texas and federal laws and market conditions; and
- Review new consumer credit products (different types of extensions of credit and ancillary products), software systems, and marketing materials before implementation to ensure compliance with Texas and federal law.



The routine activities your organization performs are interconnected with your Compliance Management System

- Choosing software and contract providers
- Training employees
- Advertising
- Documenting your internal policies and procedures

Understanding your compliance management system is your best preparation for an OCCC exam.