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The Essential Buyers Guide for Disclosure Management

Critical Steps for Choosing the Right Disclosure Management Partner

Disclosure management has become one of highest areas of risk for financial services organizations

The exponential growth in the number of financial products, offers, collateral, and digital channels, combined with increased regulatory scrutiny, has created a challenging situation for financial services companies. As a result, many organizations have made disclosure management a top priority, with the aim of addressing the following goals:

Reduce Risk by establishing a **centralized system of record** for all disclosures

Implement a standardized approach to **manage the entire lifecycle**

Maintain **regulatory trust** by implementing a solution that offers complete **auditability, traceability and transparency**

Drive **consistency and accuracy** by automating the deployment of disclosures **across all channels**

Increase speed to market of the updated disclosures, allowing businesses to **quickly respond to changing market needs**

Improve the overall experience of all stakeholders involved in the disclosure change management process by driving **greater automation, efficiencies and a unified user interface**

Ensure regulatory compliance, effective enterprise-level oversight and **reduce the risk of penalties and fines**

What Are The Best Practices for Disclosure Management?

Managing financial disclosures is a complex and ever-evolving process. It requires finding the right partners who can handle its complexities. With a thorough review of potential partners, financial institutions can ensure that their needs are met both now and in the future.

As a trusted partner to some of the largest and most innovative companies in financial services, we have a unique vantage point from which to offer perspective and support. Our team recently embarked on an analysis of leading financial organizations to answer the following questions:

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- How do the overall goals for a disclosure management system contribute to the organization's strategic goals and vision?

- What pain points and needs do different personas have?

- Which specific use cases need to be addressed?

- What impact analysis and selection requirements are specific to a disclosure management solution?

Our assessment across various top-tier institutions enabled us to develop a set of best practices. The result, a Disclosure Management Buyer's Guide, will show you how to create the processes, train the people and deploy platforms that will deliver significant business value.

This Buyers Guide Will Cover

1 Focus on Vision

The importance of articulating a clear vision before seeking a disclosure management solution - including goals, KPIs and use cases

2 Functional Requirements
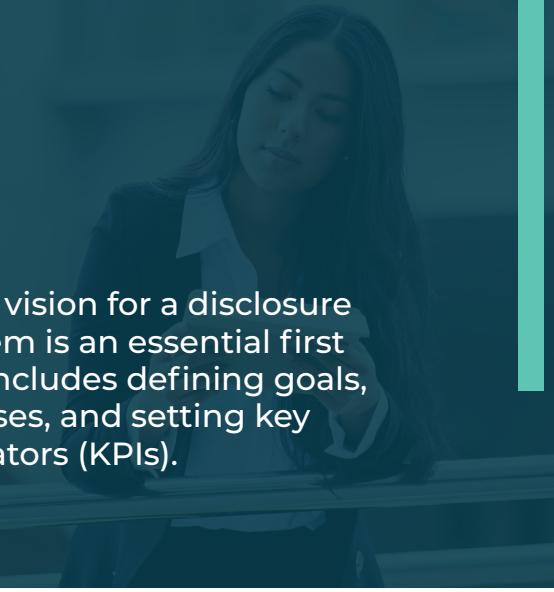
Ensuring the solution meets all the functional requirements of the entire disclosure lifecycle and the needs of the business and its stakeholders

3 Non-Functional Requirements

Why non-functional requirements are crucial for a disclosure management solution to ensure it is reliable, efficient and user-friendly

Focus
on Vision

Articulating a clear vision for a disclosure management system is an essential first step. This process includes defining goals, considering use cases, and setting key performance indicators (KPIs).

This can be encapsulated in a vision statement such as:

We strive to maintain our customers' trust, empowering them to make informed financial decisions by delivering accurate, clear, compliant, and consistent disclosures, seamlessly across all channels.

Goals

- Reduce risk by increasing accuracy and consistency of disclosure updates and deployment
- Maintain regulatory trust through strong control and governance
- Increase speed to market for updating and deploying disclosures
- Improve employee and partner experience

Use Cases to Consider

- Terms & Conditions (credit card, mortgage, etc)
- Prospectuses for investment products
- Privacy Notices
- Statements / Confirmation
- Offers and Sweepstakes
- Account agreements

KPIs and Benefits

- **Risk management:**
  Proactively identify errors by risk type and severity levels, calculate a risk score, integrate key specific channels requirements, and automate risk assessment.

- **Speed to market:**
  Define cycle time for each stage, reduce review rounds, streamline remediation and approval process through automated routing for efficient level of stakeholder's involvement.

- **Employee and partner experience:**
  Conduct regular NPS surveys, measure self-service and ease of use, track disclosure usage, and provide training / support.

Ask these Important questions:

- Have we determined the problems that need to be solved?

- Do we agree on which pain points are most important to address?

- Is there stakeholder alignment on how goals will be measured?

- What are the KPIs?

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Managing financial disclosures is a highly complex task, as ever-evolving regulation, diverse product offerings and multiple channels and jurisdictions create complexity. Hindered by manual repetitive reviews involving content creators, reviewers and approvers, the process is often slow and cumbersome, resulting in long lead times and bottlenecks. "

Once you know what you're looking for, you're ready to use the Requirements Checklist to ensure your solutions partner meets those specific criteria.

Criteria for Success in Vendor Selection

Establishing Requirements

Developed as a one-stop guide to securing a solutions provider, the Requirements Checklist covers more than 100 requirements that should be considered before selecting a disclosure management solution. The checklist focuses on two different areas: **Functional Requirements** and **Non-Functional Requirements**

Functional Requirements

- **Centralized Disclosure Library**
- **Governance and Controls**
- **Disclosure Automation**
- **Omni-channel Delivery**

Non-Functional Requirements

- **Business Configurable and Scalable**
- **Enterprise Grade Solution**
- **Security and Compliance**
- **Financial Industry Experience**

The disclosure management solution should offer a modular structure that allows organizations to select the necessary capabilities they need based on their strategic goals and priorities. This enables a customized and efficient approach that can betailored to specific needs, with the option to add or build more capabilities in the future.

Leveraging a Requirements Checklist ensures the disclosure management solution meets all the necessary requirements and drives greater efficiencies and effectiveness. The checklist serves as a valuable tool to help organizations identify and prioritize key areas of their disclosure management process and make informed decisions about their solution requirements.

Functional Requirements

When it comes to choosing a solution provider for your disclosure management needs, it's essential to look for a partner who can deliver on your present and future functional requirements. The right provider should offer a comprehensive solution that enables you to manage the entire lifecycle of your disclosures with complete traceability from creation to distribution and archival. This includes ensuring that the solution can accommodate the changing regulatory landscape and can scale to meet your needs as your organization grows.

Disclosure Library

A disclosure library serves as a centralized repository of accurate, compliant, up-to-date and ready-to-use disclosures. Your disclosure library should include powerful search capabilities, enabling users to effortlessly locate and utilize the appropriate content for their client-facing communications and ensuring accuracy and consistency in messaging.

The right disclosure management system empowers users to easily author, edit, approve, automate tasks, generate reports, and disseminate disclosures and disclaimers (D/Ds) to downstream channels. Other critical capabilities include report generation, proactive tracking and visibility into the progress and state of the disclosure management process.

The Library must also support a flexible data model that can manage all types of disclosures, such as:

Product related disclosures:
Cash and Deposit, Credit Cards, Loans, Investments, Insurance

Offer related disclosures:
Initial Credit Card Offer, Limited Multiplier Rewards Offer

Transactional and service related disclosures:
Trade confirmations, Card activation

A comprehensive disclosure library is critical for streamlining the disclosure management process, increasing efficiency and accuracy while reducing the risk of errors. Below is a list of criteria which should be included in a disclosure library.

Flexible data model for disclosure components, including product, offers, region, language and channels	
Custom data model by type of disclosure modules	✓
Ability to create a hierarchy of the disclosures components	✓
Logic based fields and visibility	✓
Powerful search capabilities	
Ability to search by product, offer, brand, etc	✓
Store search terms and results for reuse	✓
Ability to search across all business entities	✓
Versatile content blocks	
Modular content blocks that can be shared across disclosures	✓
Content block tags and metadata used for searchability and to identify where used	✓
Ability to access similar content blocks when interacting with editing or previewing a content block	✓
Multi-language disclosure management with the ability to add / edit / delete language with controls	✓
Translate disclosures into multiple languages	✓
Dynamic fields for product information, rates, offers	✓
Rich Text formatting (bold, bullet, font size, font color, etc)	✓
Copy & paste functionality for content and forms	✓
Disclosure lifecycle management	
Manage all stages of disclosures (creation, change management, approvals, publication, recertification and archival)	✓
Collaborative content creation and updates using commenting and mentions features	✓
Automated alerts and notifications for any stakeholder when new disclosures are added, updated, expiring or need to be recertified	✓
Complete auditability of all actions and changes made in the system through system generated recording (who, what, when)	✓
Content performance including number of reusable content blocks and number of content successfully onboarded	✓
Disclosure library reporting and analytics (disclosure types, number of disclosure records, etc)	✓
View current version against previous versions with highlighted differences	✓
System generated unique IDs at the disclosure record level	✓
System generated complete version history of disclosure lifecycle	✓
Role based provisioning access to various capabilities (populate, update, view, edit, share, etc)	✓
Robust export capabilities	
Export as PDF, Word, Excel, CSV, Json file	✓
Export full rules	✓
Export brand and end user activities	✓
Export reports and results	✓
Mass export	✓
Integration and API	
Advanced search API that enables inquires about a disclosure and send the response onto the downstream system	✓

Disclosure Governance and Control

Having a robust governance and control system in place ensures that disclosures are accurate, timely, and compliant with all regulatory, brand and organization specific requirements. A disclosure management system must encompass a range of features, including fostering collaborative review and approval processes with clearly defined roles, accountabilities, and permissions. It should also have AI-powered content assessment and quality control, as well as comprehensive sets of analytics and reporting for performance monitoring and continuous improvement.

Implementing a centralized system that enables collaboration and transparency across all stakeholders involved in the disclosure process, from content creators to approvers, legal and compliance professionals, and downstream channel users is imperative. Organizations can save time and reduce costs through operational efficiencies, minimize regulatory risks and protect brand reputation by proactively remediating potential errors. Resources can be reallocated to focus on value-added activities that drive strategic priorities and business objectives.

Collaborative review and approval	
Review and annotate marketing content / documents	✓
Customizable review and approval workflow with feedback loop	✓
Automated simple, parallel, sequential and conditional approval process among multiple users and / or user groups	✓
Access and compare previous version of documents	✓
Assign tasks and set deadlines so documents are reviewed and approved in a timely manner	✓
Automated routing of disclosure to appropriate stakeholders for review and approval based on predefined rules	✓
Automated alerts and notifications for any stakeholder when new disclosures are added, updated, expiring or need to be recertified	✓
Automated reminders to stakeholders throughout the disclosure change management process to ensure timely completion and prevent bottlenecks	✓
Automated tracking of all changes and version control	✓
Access audit trails with full content and approval related traceability	✓
Review and approval workflow analytics and reporting including number of disclosures in each stage, cycle time, average number of rounds required	✓
Content assessment / Quality control	
AI-powered automated assessment for content accuracy, consistency, clarity and error-free	✓
System customizable to brand and regulatory compliance standards, rules and guidelines	✓
Content, image and website scanning and validation based on set of rules and standards	✓
Video annotation analysis based on set of rules and standards	✓
Smart tone and emotions detection for written content	✓
Spelling, grammar and punctuation error detection	✓
Readability detection (passive voice, complex words, hard-to-read sentences, unclear sentences)	✓
Content suitability based on target audience	✓
Auto-tagging document and content	✓
Real-time compliance assessment	✓
Automated visual comparison side by side, reference or candidate document and access previous comparisons (text, style, image and pixel differences)	✓
Annotation, email notification and action assignment to resolve or reply to comments	✓
Risk level assignment at the rule level	✓
Risk scoring	✓
Reporting	
Custom reporting and analytics to identify trends, risks and inefficiencies	✓

Omni-Channel Content Automation

Disclosure automation is an essential component of any comprehensive disclosure management solution. It simplifies the process from collateral creation to proofing and publishing, while increasing overall effectiveness and compliance.

Look for a system with integrated content onboarding capabilities, including scanning for similar content and assets and extracting relevant metadata, as well as unmatched content and assets.

Disclosure automation capabilities should utilize template editing and rule engines to orchestrate the process, incorporating branded approved templates, reusable content components, and automated ADA tags for digital content. These capabilities provide a wide range of benefits, including streamlined processes, improved efficiency, enhanced compliance, and reduced risk.

Choose a vendor that has real-time disclosure personalization, automated document bundling, and automated scheduling for data import, proofing, and publishing. See the complete list of requirements below:

File and asset upload	✓
Automated metadata extraction	✓
Advanced search using metadata or fuzzy search for disclosures ready-to-use and read only view	✓
Ability to scan document at upload to identify similar content blocks that are stored in the platform	✓
ADA tagging for digital content (email, website and digital PDF)	✓
Template libraries for consistent branding and styling	✓
Web-based template engine with dynamic content capability	✓
Published digital disclosures with accessibility features	✓
Business user configurable rules engine for proofing and publishing	✓
Disclosure proofing and publishing	✓
Real-time disclosure personalization	✓
Automated document bundling	✓
File conversion (HTML to PDF, PDF and Word to HTML, etc)	✓
Automated scheduling for data import, proofing and publishing	✓
Asset, content block, disclosures analytics	✓
Disclosure ready-to-use and read-only download and sharing	✓
Published digital disclosures with accessibility features	✓
Template, asset, ready-to-use disclosure version control	✓

Omni-Channel Delivery

In today's fast-paced digital world, financial institutions are required to provide their customers with up-to-date, accurate, and compliant disclosures across a multitude of channels. To meet this demand, disclosure management platforms must incorporate omni-channel delivery capabilities. These capabilities include a library of channel-ready disclosures under version control, automated content transformation for omni-channel deployment, and automated disclosure delivery scheduling.

Additionally, the platform should have a global style guide and transformation engine to enable the same content block to be used across documents and displayed properly on any channel. Integration with third-party platforms and disclosure deployment via public links or APIs are also essential for consistent, efficient and effective disclosure delivery.

This small but crucial portion of the Requirements Checklist helps ensure customers have access to the information they need, whenever and wherever they need it.

Library of channel-ready disclosures under version control	✓
Disclosure deployment via CDN	✓
Disclosure deployment via APIs	✓
Automated content transformation for omni-channel deployment	✓
Global style guide to enable omni-channel delivery using the same content block across documents and channels	✓
Integration with third-party platforms	✓
Automated disclosure delivery scheduling	✓

Non-Functional Requirements

Non-functional requirements — business configurable and scalable, an enterprise grade solution, security & compliance, and industry expertise — are essential considerations in vendor selection.

Non-functional requirements ensure that your solution is reliable, efficient, and user-friendly. By addressing key areas such as performance, security, scalability, and compliance, a well-designed solution can reduce risks, increase productivity and enable organizations to meet regulatory requirements.

Business Configurable and Scalable

A business configurable and scalable disclosure management system is designed to offer maximum flexibility and adaptability to the unique needs of organizations. By providing users with configurable options, it allows businesses to tailor the disclosure management process to their specific requirements, improving efficiency and control.

With the ability to integrate with other systems and applications, you can streamline workflows and have real-time access to data, thereby improving overall business operations. A solution that is easy to use and integrates well with other systems can improve employee and partner experience, while being business configurable with no code changes.

Business configurable and scalable	
Ability to self-serve and configure platform with no need for ongoing developer and tech support	✓
Connectors with Offers / Product / Pricing systems	✓
Robust API to integrate with tools in the ecosystem including but not limited to workflow management, content and delivery channels	✓
Push / Pull of language fields to platforms to ingest disclosure changes	✓
Send encrypted data to multiple systems / LOBs	✓
Receive encrypted / unencrypted data from multiple systems / LOBs	✓

Enterprise Grade Solution

Ensuring that a vendor has an enterprise grade solution reduces risk and boosts your brand

An enterprise-grade disclosure management solution that includes robust user management, efficient deployment, comprehensive training, and reliable support capabilities is managing and distributing disclosures across multiple teams and channels. Such a solution ensures that teams can work efficiently and effectively to meet compliance requirements, reduce risk, and maintain brand reputation.

User management	
Web-based platform with secure Single Sign On (SSO)	✓
End-user set-up for configuring and maintenance with no need for ongoing developer or tech support	✓
Admin capabilities to add, delete and modify users	✓
Robust set of user settings and preferences to control access for multiple internal and external users and groups	✓

Deployment	
Ability to deploy features using a micro-services architecture	✓
Platform deployment process that includes a dedicated User Acceptance Testing (UAT), STAGING & DEV instances for testing, with the ability to refresh the UAT environments with each release	✓
Isolated environments at the VM level, including separate application and database servers	✓

Training and support	
Demonstrate ease of use / navigation of the proposed solution	✓
Online tool tips and descriptive text	✓
Online user documentation and self-help pages	✓
Client specific guide portals for user documentation	✓
Customer support for urgent and non urgent instances	✓

Security & Compliance

Security and compliance are critical features that should be present in any disclosure management solution. They ensure that sensitive financial information is protected and that regulatory requirements are met, reducing the risk of costly penalties and reputational damage.

The importance of having strong security and compliance capabilities cannot be overstated. Any disclosure management solution must include comprehensive security, reliability, certification and compliance as well as privacy capabilities.

Security requirements	
Ability to meet all company security and technical requirements	✓
Data encryption in transit and at rest	✓
Configurable role based permissions & access controls, including password limitations, two-factor authentication, SAML / SSO	✓
Vendor audit & approval process	✓
Isolated environments at the VM level, including separate application and database servers	✓

Reliability requirements	
99.99% overall uptime	✓
Geographically dispersed data centers	✓
Business continuity & disaster recovery protocols	✓
Regular systems monitoring, including daily vulnerability scans	✓
Annual independent security testing	✓
Static code analysis tools in CI environment	✓

Certification and compliance	
FINRA / SEC Rule 17a-4 / WORM storage	✓
SOC2 Type II certification	✓
Key management using HSM - FIPS-140-2 Level 3 compliant	✓

Privacy requirements	
GDPR compliant	✓
CCPA compliant	✓

Financial Industry Experience

In a highly-regulated and complex industry, identifying vendors with deep financial industry experience is a critical component for disclosure management success.

Developing a disclosure management system that meets the unique needs of financial institutions requires a thorough understanding of regulatory requirements, industry best practices, and customer needs. This expertise enables vendors to ask the right questions to uncover pain points, inefficiencies, and potential risks in the current process, resulting in the right configuration and implementation. By selecting a vendor with industry knowledge and expertise, organizations can maximize value not only for themselves but also for their end-customers.

With the help of checklists, benchmarks, and self-assessments, financial institutions' disclosure teams and enterprise leaders can be prepared to meet the challenges presented in the current climate.

The following supplier criteria outlines factors that help financial services teams find the right partner.

Demonstrate previous experience and expertise with similar build & migration and development efforts with relative benchmarks and design patterns	✓
Confirm approach on overall strategy, estimation and planning of the proposed solution	✓
Demonstrate an understanding of technical / functional requirements as well as overall scope	✓
Meet the requirements of various use cases	✓
Demonstrate subject matter expertise and skilled resources	✓
Purposely-built for financial services	✓

Financial services teams who equip themselves with the proper tools, technology and vendor partners can effectively navigate the complexities of disclosure management and compliance, positioning themselves for long-term growth.

What to Expect

Benefits of a Good Solutions Partner

Choosing the right disclosure management partner is important. Here's just a sampling to reinforce why careful vendor selection, using key criteria, can deliver vital and valuable benefits.

Access Control	Accurate	Auditable	Automated Workflows
Centralized	Collaborative	Compliant	Content Repository
Customizable	Dedicated Support	Efficient	Reduce Cycle Times
Reputation-building	Risk-reducing	Role-based Access	Scalable
Secure	Streamlined	Transparent	User-friendly

Vendor Selection Simplified for Success

A truly valuable partner not only provides the right tools and technology but also has a deep understanding of your business goals. They will work with you to develop a customized approach that meets your specific needs.

Choosing the right partner for your disclosure management system is essential to ensure that your business meets regulatory compliance, maintains transparency, and achieves efficiency. Use the **Requirements Checklist** to carefully evaluate potential vendors to ensure their disclosure management solution includes all necessary capabilities.

To get the Disclosure Management Requirements Checklist in Microsoft Excel format, visit: naehas.com/disclosure-management-requirements-checklist.

About Naehas

Naehas is the leading industry cloud for financial services companies to flawlessly deliver personalized products, pricing and experiences. Our Disclosure Management Solution is a centralized platform that enables organizations to create, manage and distribute disclosures with ease and efficiency. It streamlines the disclosure process, ensures accuracy and consistency, and provides transparency and accountability while reducing risk and improving compliance.

Learn how your company can improve your disclosure management process with our unique, automated solutions bycontacting sales@naehas.com or visiting www.naehas.com.

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