REVISED OPERATING MODEL

A relationship program, kept simple.

The intended participant

An established attorney, accountant, financial advisor, insurance professional, Realtor or business owner whose existing clients or employees may benefit from voluntary access to IIMBC. The individual keeps their existing practice. Do not present participation as automatically permissible for every profession or firm.

What IIMBC coordinates

IIMBC provides approved information, the licensed lending contact, underwriting/processing coordination through the lending team, and case-by-case support for approved swag and events. The AE does not take applications, assess borrowers or run the lending process. The partner dashboard is the AE dashboard; confirm modules actually enabled before promising access.

What is not part of this offering

No cold-call program, territory-building assignment, daily activity quota, required event schedule, guaranteed lead supply, discretionary budget, standing expense allowance or paid launch stipend. Required compensation for actual employment work still applies; these commercial choices do not remove wage obligations.

The unresolved launch issue

The requested fixed fee/bps for low-touch introductions is not presumed lawful for an unlicensed individual. Florida 494.001 and 494.0025(7), Regulation Z and RESPA must be evaluated together. Regulation X's own-employee exception does not resolve separate licensing or compensation restrictions. A paper employment label is insufficient. Keep transaction activity on HOLD until counsel establishes an actual lawful route. [1,2,4]

Individual professional review

Attorneys: privilege, loyalty, personal financial conflicts and firm ethics review. CPAs/tax professionals: independence, commission disclosures and tax-information restrictions. Advisors/insurance professionals: firm, fiduciary and outside-business rules. Realtors: broker policies and settlement-service conflicts. Employers: voluntary participation, no pressure and no access to employees' private loan information. Client consent cannot cure a prohibited arrangement. [9]

Execution sequence: review the role and pay -> resolve firm permissions -> complete and sign schedules -> payroll and work authorization -> short role training -> written release -> enabled access. No paid pilot before the legal release.

PAY MODEL / PERFORMANCE / PAYROLL

Keep progression objective.

Two methods, one selected arrangement

Choose a fixed dollar fee per eligible transaction or a fixed bps rate on eligible funded principal. Do not silently combine methods. Record scope, attribution, minimum/maximum if lawful, payroll timing and earning conditions. There is no draw election in this revision; statutory wage supplementation remains. [1,4,6,7]

Prospective performance progression

Use the same elected method throughout the tier schedule. The standard form measures prior-quarter eligible funded count OR total eligible funded principal, then applies the resulting rate to new eligible introductions in the next quarter. Lock the rate at first eligible receipt; retain that rate for the matter. Thresholds cannot depend on price, product terms, margin or lender choice. Counsel must approve the full scheme before activation. [4]

Worked examples - illustration only

At 100% attribution, a $750 fee produces $750. At 20 bps, $400,000 x 20 / 10,000 = $800. A later legally approved 25-bps tier produces $1,000 on a new eligible $400,000 transaction. At a 50% documented attribution share, that last example is $500. These figures do not populate any employee's agreement.

W-2 administration is real employment

Set a workweek, time-entry method, payroll administrator and wage-floor process. Record short calls, messages, required training and other compensable work. Default to nonexempt classification unless a duty-specific exemption is established. Reconcile commissions into overtime when required. Do not treat a zero-funding period as zero wages owed. [6,7]

Onboarding and official forms

Collect W-4 and complete the current I-9 through a secure payroll process; evaluate applicable Florida E-Verify and new-hire requirements. The W-2 remains included for employer year-end reporting, not applicant completion. Do not paper-file downloaded red Copy A with SSA; use authorized electronic filing or the proper scannable form. Keep sensitive payroll documents separate from client records. [10,11]

No health coverage, PTO, paid launch bonus, guaranteed earnings or other discretionary benefit has been added. Management must approve any later change in a separate written policy.

RESOURCE POLICY / COMPANY COORDINATION

Useful branding. Thoughtful events.

Personal-use swag

Issue branded items for ordinary personal use and brand visibility under a consistent written policy. Record item, recipient, purpose and whether gifted or returnable. Do not tie premium items to referral count or closed-loan volume. Review value and tax treatment. The own-employee payment rule is not a substitute for the mortgage and professional analysis. [2,3]

Items for clients

Require a stated distribution purpose, recipient category and quantity before approval. Do not reward clients for referring others, promise a gift for a loan application or closing, or subsidize another professional's ordinary business expenses. Company-branded items are not automatically permissible merely because they have a logo. Keep any lender-use consumer incentive outside this general swag policy and separately reviewed. [2,3]

Luncheons and group introductions

Optional gatherings may serve clients, employees or mixed audiences. Obtain purpose, agenda, expected attendees, location, licensed presenter and cost review before inviting or booking. Review whether any attendee is a settlement-service referral source and whether the event defrays an expense they would otherwise incur. No referral quota, exchange or mandatory continuing-education subsidy. Retain approvals, agenda, invitations, invoices and attendance. [2,3]

Request fulfillment

Workflow: submitted -> review / information needed -> approved -> scheduled or ordered -> fulfilled -> closed. IIMBC handles vendor commitments and payment. The AE may suggest preferences but may not incur costs. Record any change in audience, purpose or cost for renewed review. Approval is event-specific, not an annual spending entitlement.

Employee homeownership access

Describe the employer offering as voluntary access to education and a lending contact. No guaranteed approval, employer-funded financial benefit or preferential loan terms are promised. Borrowers communicate privately with IIMBC. Give employers only aggregate participation information that cannot identify a borrower's finances, unless separate lawful authority supports a specific disclosure.

FILLABLE REQUEST / MANUAL DASHBOARD FALLBACK

Request branded items.

AE / business / contact

Requested items and quantities (preferences only)

☐ Personal-use branding ☐ Client distribution

Purpose / recipient category / proposed distribution method

Preferred delivery address / timing (no borrower financial data)

Submitting this form does not authorize an order or promise an item. IIMBC confirms approved selections and arrangements. Do not tie items to applications, closings, referral volume or referring other people.

IIMBC USE

☐ Approved as specified ☐ More information / declined

Approved items / conditions / approver and date / fulfillment owner

FILLABLE REQUEST / MANUAL DASHBOARD FALLBACK

Request a shared conversation.

AE / business / contact

☐ Luncheon / brunch

☐ Other group event

Purpose / audience needs / preferred topic

Audience composition, approximate count and any referral-source attendees

Preferred dates / duration

Location / virtual preference

Accessibility / dietary / logistics needs; no medical details

IIMBC reviews audience, agenda, presenter, venue, cost allocation and any gifts before commitments. No referral requirement or guaranteed approval. Client financial discussions move to private appointments.

☐ Approved subject to written conditions

☐ Pending / declined

IIMBC coordinator / licensed presenter / approval reference / conditions

INTERNAL RELEASE / RECORDKEEPING

Before the first introduction.

Program owner

Review date

- [ ] Written legal basis for actual duties and transaction pay is attached
- [ ] Required licenses, sponsorship or specific exemptions verified
- [ ] Profession / firm / employer permissions and client disclosures approved
- [ ] Agreement and compensation / performance / resource schedules complete
- [ ] Genuine employment, payroll, work records and applicable onboarding complete
- [ ] Short role training, privacy and prohibited-activity checks complete
- [ ] Dashboard access is limited; request routing and interim process work
- [ ] Source records, consent evidence, compensation locks and audit logs retained
- [ ] Swag and event policy implemented with individual approvals

Counsel review reference / approved scope / unresolved conditions

- [ ] HOLD - do not begin compensated introduction activity
- [ ] Release only the written legally approved scope

Authorized Company signature / date

PRIMARY SOURCES / REVIEWED OCTOBER 22, 2026

Authorities and implementation notes

The agreement is drafted for Florida review. These sources support the legal distinctions in this guide; they do not establish an exemption for any particular AE. Recheck law and professional rules before launch or a material change.

1. Florida Statutes 494.001; 494.0025

Definitions, unlicensed conduct and transaction payments.

Open official source

2. Regulation X, 12 CFR 1024.14

RESPA referral restrictions, genuine own-employee exception and promotional activity.

Open official source

3. CFPB RESPA FAQs

Fact-specific treatment of gifts, meals and educational events; no blanket small-gift safe harbor.

Open official source

4. Regulation Z, 12 CFR 1026.36

Originator status, referrals and compensation; overall-volume measures do not cure licensing defects.

Open official source

5. Florida Statutes 542.335

Written restrictions require legitimate interests and reasonable scope.

Open official source

6. FloridaCommerce: minimum wage

General Florida minimum wage $15 per hour effective September 30, 2026.

Open official source

PRIMARY SOURCES / CONTINUED

Payroll, privacy and professional review

7. U.S. Department of Labor: FLSA guide

Minimum wage, overtime, records and fact-specific exemptions.

Open official source

8. 18 U.S.C. 1833(b)

Trade-secret whistleblower immunity and notice.

Open official source

9. Florida Statutes 473.3205

CPA commission/referral restrictions and written-disclosure requirements.

Open official source

10. USCIS Form I-9; Florida Statutes 448.095

Employment verification and applicable E-Verify obligations.

Open official source

11. IRS Forms W-4 and W-2

W-4 is employee withholding; W-2 is employer wage reporting. Official 2026 forms follow.

Open official source

For attorney, adviser, insurance and real-estate participants, obtain individualized review of current professional rules and firm policies. A general mortgage-program agreement cannot pre-clear all outside practices. Evaluate tax-information restrictions, consumer privacy, consent, fair lending and applicable solicitation laws for the actual workflow.