



CAAR Policy #10: Lockbox System Policy

Policy

Statements of Lockbox System Policy and Procedures

Lockbox system policy, rules, and regulations are described in the following three documents:

1. CAAR Lockbox Security Requirements: Describes the minimum-security measures that our lockbox system must follow in order to have the protection of the NAR Errors and Omissions Insurance Program.
2. Lockbox Key Lease Agreement: The agreement that is digitally signed by all key holders upon activation of users SentiLock account; It describes the keyholder's and broker's responsibilities.
3. This document, CAAR Policy #10: Describes CAAR lockbox system policies.
4. Signature of this policy is required by all cooperating eKey users who wish to participate in our key system to open CAAR lockboxes.

Lockbox Key Policy

1. The lockbox key system is the sole property of CAAR.
2. Lockbox electronic Key service can be leased to any REALTOR® in the state of Virginia, with proof of active membership from the Association with which the REALTOR® is affiliated, in the form of a letter of good standing. A CAAR Lockbox SentiLock Key subscriber form must be signed by the key holder.
3. In signing the CAAR Lockbox SentiLock Key subscriber form, the principal broker accepts ultimate responsibility for ensuring that the key holder abides by the CAAR Lockbox Security Requirements, the Lockbox Key Lease terms of service, and the CAAR Policy 10: Lockbox System Policy rules and regulations.
4. The terms of the CAAR Lockbox subscriber agreement are statements of CAAR Lockbox System Policy. Additional rules, regulations, and statements of policy are found in this document and in the CAAR Lockbox Security Requirements.
5. A REALTOR® may not be in possession of another REALTOR'S® SKey device.
6. A REALTOR® may not allow a person who is not a REALTOR® or key holder to be present in or have access to properties, unless accompanied by a REALTOR® or the seller, without the written permission of the listing agent or seller. House keys may not be issued to a person who is not a REALTOR® or key holder without the written permission of the listing agent or seller.
7. A REALTOR® must secure the property and the property key unless otherwise directed by the listing agent or seller.
8. The Listing Broker or Agent may issue one-time code to non-member REALTORS®. Temporary access codes for non-member REALTORS® can be issued for a time selected by the listing agent.

Lockbox Location Policy

1. A lockbox may not be placed on a property without written permission from the owner of the property.
2. Recommendation: For added security, it is recommended that lockboxes be affixed securely to the listed property (but not to a US Mailbox).

Lockbox Ownership Policy

1. Ownership: Any REALTOR® licensed in the state of Virginia is eligible to purchase a lockbox.
2. Access to that box is dependent on Board reciprocity or subscription to CAAR SentiLock Key service.

Summary of Possible Lockbox System Policy Violations:

1. Lending a device that provides access to a personal eKey.
2. Possessing another person's device that gives access to a personal eKey.
3. Divulging a key's Personal Identification Number (PIN), thereby giving access to a personal SKey.
4. Failing to keep key device secure from theft, thereby affording possible access to the use of the SKey.
5. Allowing a person who is not a REALTOR® or a key holder to be present in a property, unaccompanied by the seller or key holder, without the written permission of the listing agent or seller.
6. Issuing a house key to a person who is not a REALTOR® or key holder without the written permission of the listing agent or seller.
7. Failing to secure the property upon leaving the property, unless otherwise instructed by the listing agent or seller.
8. Failing to secure the property key.
9. Intentional damage, theft, loss of key boxes from assigned properties.
10. Placing a lockbox on a property without written authorization from the owner.

Processing Alleged Lockbox System Policy Violations

Steps for Reporting Suspected Lockbox System Policy Violations

Anyone who suspects a lockbox violation may report it via the following steps:

1. Suspected violations should be reported to CAAR staff as soon as possible using the complaint form.
2. All reported suspected violations will be considered a violation review and handled in accordance with appropriate penalties.

Penalties for Violations:

Penalties for the violations above or for violations of the Lockbox Key Policy or CAAR Lockbox Security Requirements may be assessed to the key holder and/or his/her principal broker, and may include, but are not limited to, the following:

1. A letter of reprimand, with a copy of correct procedures attached, sent to the REALTOR® and principal broker and placed in the REALTOR'S® CAAR membership file.
2. A requirement to attend the next available CAAR New Member Orientation class following assessment of the penalty.
3. A fine of not less than \$100.00 unless there is a violation of paragraph one (1) of the Lockbox Key agreement in which case the fine will be not less than \$500.00.
4. The suspension of lockbox privileges, including deactivation of Skey service by CAAR staff.

Lockbox System Policy Violation Review Process

A "Violation Review" is the process through which CAAR MLS Staff does an initial investigation of a reported violation to determine whether the alleged violation actually occurred. If Staff finds sufficient evidence that a violation has occurred, the matter is sent to the MLS Committee for review and the possible imposition of a fine or sanction(s) or both. Any penalty imposed must be within the limitations stated within this policy or subject to the Regional Rules and Regulations for Lockbox Systems existing as part of the Citation Policy of CAAR's Professional Standards Policy.

If a violation is found, the REALTOR® and Principal Broker will be notified.

Information reviewed as part of a Violation Review is strictly confidential and is discussed only as needed with other pertinent CAAR staff, MLS Rules & Regulations Group Members, or Board members in the context of the Violation Review.

Participating and Reciprocal Agents Accessing CAAR SentiLock Keyboxes

Agents participating in SentiLock services through CAAR and/or accessing CAAR SentiGuard Lockboxes are bound to the CAAR Policy #10: Lockbox System Policy and CAAR Lockbox & Key Security Requirements.

Agents participating in CAAR's key service are required to sign this form.

Agent Signature

Date