



NMLS B2B Access: Frequently Asked Questions

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NMLS Consumer Access Data versus B2B Access

Is all of the data displayed in Consumer Access in B2B Access?

ANSWER

No. The following data viewable in Consumer Access is not included in B2B Access:

Companies:

- Business Phone Number
- Fax Phone Number
- Email Address

Individuals:

- Phone number (business phone number) for the individual Mortgage Loan Originator
- Fax Phone Number
- Self-reported Employment History

Phone numbers and email addresses are intentionally left out of B2B Access so that it is not used for solicitation purposes

State-Licensed vs. Federally Registered - How the files work

There are nine tables for individuals. How are they related and why are some individuals in some tables, but not in others?

ANSWER

To see how the tables connect, take a look at the ERD diagram (found on the NMLS B2B Access page on the NMLS Resource Center).

The main thing to keep in mind is that there are two kinds of individuals – State-Licensed and Federally Registered.

State-Licensed

- All state-licensed individuals will have at least one record in the IndividualLicense table.
- Many, but not all, state-licensed individuals can be connected to a Company by way of the IndividualSponsorship table (Individual > IndividualLicense > IndividualSponsorship > Company). NOTE: Not all states require that an Individual has their license officially “sponsored” by a company.
- In the IndividualLocation table, many, but not all, state-licensed individuals will have a record connecting them to the address of either a company or a branch (the LocationType field will tell you which it is).

Federally Registered

- All federally registered individuals will have at least one record in the IndividualRegistration table.
- All federally registered individuals will have at least one record in the IndividualRegistrationDetail table, which connects them to a company, meaning that all federally registered individuals must be connected to at least one company.
- In the IndividualLocation table, all federally registered individuals will manually enter the address where they work, which can be different than the company’s headquarter address. (This is because federally registered institutions are not required to register all of their branches, so the individual cannot connect themselves to a branch location in NMLS. They just give the address of the branch manually.)

IndividualSponsorship and IndividualLicense tables

Will every individual MLO be found in both the individual sponsorship and individual license table?

ANSWER

No and no. For example, a federally registered MLO who works for a bank will be found in neither table. Every individual will be in either the IndividualLicense table or the IndividualRegistration table, or both. Most of the people in the IndividualLicense table will also be in the IndividualSponsorship table, but not necessarily because a few states do not require sponsorship. If you look at one of our quarterly reports (<http://mortgage.nationwidelicencingsystem.org/about/Pages/Reports.aspx>) you can scan the footnotes for the states that do not require sponsorship.

License Status changed today, but Status Date is in the past

We noticed that a license status changed today. However, the status date (i.e. effective date) is not today's date. It is several weeks in the past. Why is this?

ANSWER

State regulators have the ability to "back-date" a license status in order to render the new status as being effective since a time that occurred in the past.

Invalid Data in Date Fields

Several date fields are not system generated and are thus susceptible to data entry error. This could result in a date that is valid but unreasonable, such as 01/01/0006.

- IssueDate (Original Issue Date) is found in several files and is not always a system generated date. When an existing license gets transitioned onto NMLS, the regulator manually enters the original date.
- IndividualLocation.StartDate can also be entered manually by the regulator.

Similar or Duplicate Records

Some of the files can contain very similar records. The following chart provides rules for determining the most recent (current) record.

	File	Scenario	Rule
1	IndividualSponsorship	Multiple records with the same values for: IndividualNMLSID + LicenseID + CompanyNMLSID.	User record with the most recent StartDate and a blank or null EndDate.
2	IndividualSponsorship	Multiple records with the same values for: IndividualNMLSID + LicenseID + CompanyNMLSID + StartDate.	Use record with a blank or null EndDate.
3	IndividualLocation	Multiple records with the same values for: IndividualNMLSID + CompanyName + LocationNMLSID + LocationType .	Use record with the most recent StartDate
4	IndividualLicense	Multiple records with the same values for: IndividualNMLSID + Regulator + LicenseNumber + LicenseType.	Use record with: 1. An active status, and 2.The most recent StatusDate <i>For a list of "active statuses", see chart below.</i>
5	CompanyLicense	Multiple records with the same values for: CompanyNMLSID + Regulator + LicenseNumber + LicenseType.	Use record with: 1. An active status, and 2.The most recent StatusDate <i>For a list of "active statuses", see chart below.</i>
6	BranchLicense	Multiple records with the same values for: BranchNMLSID + Regulator + LicenseNumber + LicenseType.	Use record with: 1. An active status, and 2.The most recent StatusDate <i>For a list of "active statuses", see chart below.</i>

The following are ACTIVE status values:

- Approved
- Approved-Inactive
- Approved-Surrender/Cancellation Requested
- Temporary Cease and Desist
- Revoked-On Appeal
- Suspended
- Suspended-On Appeal

The following are INACTIVE status values:

- Denied
- Revoked
- Expired

- Surrendered
- Voluntary Surrender
- Ordered to Surrender

Duplicate licenses under the same regulator

For a given entity (company, branch or individual) there can only be one license instance of a given type that has an active status. This is the current record regardless of dates. Due to some bad data there may be, on rare occasions, multiple active licenses. In this case the one with the latest status date should be considered "official". These anomalies are immediately fixed once identified but still can occur and NMLS is actively working to eliminate the scenarios that cause this to happen.

Removal of records from NMLS B2B Access Data

Data in NMLS can be changed for any number of reasons (correcting software errors, regulator corrections, etc.). This could cause data to no longer exist within the download. The latest version is always the most correct and any data that is no longer included should be removed.

Users should also be aware that Consumer Access Data falls out of scope over time. The logic gets a bit complex but basically if a license remains in a "not approved" status for more than 5 years, then the information is removed from Consumer Access.

Two different employers?

NMLS Consumer Access site appears to show the EmployerName at the top of the screen under "Authorized to Represent". Is this correct? In some cases, then, the NMLS ID displayed alongside it doesn't correspond to the name displayed. Why would the name for "Authorized to Represent" be different from the NMLS ID displayed alongside it? What does "Authorized to Represent" mean in this case and how is it intended to be used by consumers using the Consumer Site?"

ANSWER

For federally registered MLOs, the Employer/Company name is displayed as it is entered in the individual MLO's record (known as an MU4R filing). This was allowed in order for individuals who work for divisions (not subsidiaries) of a bank that are separately branded from that bank to provide that information to Consumer Access so consumers can use that division name for search purposes.

What cannot be changed is the NMLS ID of the employing institution, which drives the Company Legal Name Field in Consumer Access. The Legal Name is based on the institution's record (an MU1R filing), and NMLS reviews all legal names for accuracy at the time an institution creates their account in NMLS.

In the case where one bank buys another bank, it may be that an individual will still show the old bank in their individual record, but be officially employed by a new bank. Each bank has the opportunity to review the MLOs record prior to employment confirmation, and typically, in this scenario, the new employing bank would catch a discrepancy.

Generally speaking, in the cases of discrepancies, the Company Legal Name and accompanying NMLS ID is far more reliable for determining which institution employs the MLO, as the MLO cannot change that information.

Two Employers (part 2)

Is it possible for a federally registered MLO to be employed by two different institutions at the same time?

ANSWER

Yes, the system allows multiple employments to exist.

Decrease in IndividualLocation records

Why would the number of records in the IndividualLocation file go down?

ANSWER

Let's say a bank lays off a bunch of MLOs. Those individuals will now become "inactive" as far as their registration status is concerned. But they will continue to appear in the B2B download, and their status would be "inactive". However, when their location becomes inactive, we no longer include it in the download. We only send over "active" locations. So the number of records in the IndividualLocation file may actually decrease at certain times.

Can a dually regulated MLO do loans for both a mortgage company and a bank?

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ANSWER

There can be some interesting situations when banks and mortgage companies get together. Let's say there is a scenario where Main Street Bank buys ABC Mortgage. Both Main Street and ABC Mortgage are working throughout New England. And let's say Bob used to work for ABC Mortgage and held licenses all over New England. But now that Bob is connected to Main Street Bank, he can work directly for them and use one Federal Registration to do business all over New England under Main Street Bank. But for some reason he also kept his state license active in New Hampshire, and that license is sponsored by ABC Mortgage. Bob is dually regulated. Because of this, Bob is able to: 1. Originate for Main Street Bank anywhere that Main Street operates, or 2. Originate for ABC Mortgage in New Hampshire. What Bob cannot do is originate for ABC Mortgage outside of New Hampshire, because his connection to ABC Mortgage is only through his New Hampshire license. If Bob originates a loan in Vermont, he must do so through Main Street Bank.

Can Federally Registered MLOs do loans anywhere in the country?

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ANSWER

If an MLO holds a federal registration, they are compliant regarding the SAFE Act requirements for all states across the country. However, the institution they work for may only be authorized to operate in certain states. So a state-chartered bank may only hold a charter in one state, and so their MLOs could only do business in that state. The NMLS B2B Data will not be able to tell you in which states the federally regulated institutions and MLOs can operate (this includes state-charted banks).

With state-licensed mortgage entities, however, you can ask the B2B Data to tell you in which states they are authorized to conduct business, because they must use NMLS to acquire licenses for each state. So there are two paradigms at work (state and federal) and the B2B Data has different levels of information for those paradigms.

Company shows Trade Name instead of Legal Name

The company's legal name as recorded by the Secretary of State of the domiciling state was not reflected in the Full Legal Name section of the company's record. Instead, the company's legal name was entered as a Trade Name.

RESOLUTION

If a B2B user encounters a possible error in the company's legal name, they can notify CSBS who will alert the state regulator to this possible error since they are the governing agency responsible for requiring any necessary corrections.

Authorized to Conduct Business Versus Authorized to Represent

In many cases a licensee has a License entry that has "IsAuthorized" set to "Yes" but they only have one sponsor record associated with them for that license, and that sponsorship record indicates an "End Date". In this case the Consumer Access site seems to say that they are "Not Authorized" for that particular license, even though our source data for that license might say "Yes". Is the intent that we are supposed to "override" the status listed on a particular license, if the individual does not have any active sponsors, even if the license entry itself says "Yes" for "IsAuthorized"?

ANSWER

There are two types of "authorized". The first is to "conduct business". This is indicated by the "IsAuthorized" flag in the IndividualLicense file is driven strictly by the status of the license. If a license is in one of the Approved statuses (excluding Approved-Inactive), then they are allowed to conduct business.

The second type of "authorized" is "authorized to represent." This is determined by an active sponsorship in the IndividualSponsorship file.

So these are two different things. If you go into Consumer Access, you can see the "Is Authorized to Conduct Business" at the license level and then if you "view details" you will see the sponsorships and whether or not they are "authorized to represent."

The Company Sponsoring an MLO does not appear in Consumer Access

We have found a number of individual MLOs who have sponsoring companies that do not correspond to any companies or branches in the data feed. The NMLS IDs appear to be valid and correctly formatted but the IDs simply do not appear anywhere else, other than as a sponsor for the individual records that reference them. Is this intentional, and is it intended to imply that the sponsoring entity no longer exists, or is this a data quality error or a mistake on our part?

ANSWER

The scenario which you have uncovered is as follows:

- A company applies for a license
- While the company's application is pending, the company creates a sponsorship with a licensed MLO
- The regulator approves the sponsorship with the MLO while the company application is pending
- The company is either denied a license or withdraws its application
- Because the company never held an approved license, they never enter into Consumer Access. However, in order to show the historical sponsorship, we pull in the company name and NMLS ID that we have in our system.
- This scenario is not in keeping with the best practices established by the regulators. They generally do not approve sponsorships until the company has an approved license. However, the system will allow them to do so.

LicenseNumber Field

(See NMLS ID 173945). There is a licensee whose LicenseNumber is "7/11/2011". Is this an error?

ANSWER

The LicenseNumber field is an optional field that regulators can use to enter a license number from their legacy system. It is a manual entry and so it is open to user error.

What if an MLO doesn't pass their test?

When someone is trying to get approved with a State through NMLS and they do not pass their test.

1. *Do they have an NMLS ID that stays with them forever?*
2. *What is their status on Consumer access? Or B2B Access?*
3. *What happens when they now go to work at a bank and they come through to register as an LO of the bank? Do they keep the same NMLS ID?*
4. *Does their NMLS ID record reflect anywhere that they did not previously meet the requirements?*

ANSWER

1. NMLS ID is connected to SSN, so yes, you only get one and it stays with you.
2. You only show up on Consumer Access if you have held a license or registration or have been denied a request for licensure. If you don't pass the test, you don't get a license and you never make it to Consumer Access.
3. Yes, same NMLS ID.
4. If they fail a test and then get hired by a bank, it seems possible that their employing institution could see that they had failed the test. But I'm not sure about that. But the failed test is definitely not public. It doesn't go to Consumer Access.

FYI, in 2011, most states elected to turn on a switch in NMLS that prevents an MLO from applying for a license until they have completed their tests and their pre-licensure education.

Do state-regulated bank employees need a license?

Are individuals who are actively registered through NMLS and hold an active Federal Mortgage Loan Originator Registration required to be licensed or are they exempt from licensing? It's my understanding that employees of national/federal banks do not need to be licensed. However, employees of state banks are still required to be licensed. Can an individual have both a State-Regulated License and a Federal Mortgage Loan Originator Registration in NMLS?

ANSWER

Anyone who works for a bank (state or federally chartered) does not need a license, only a registration. An individual could technically hold both (e.g. they worked for a non-depository and held an MLO license and then went to work for a bank and got a registration).

Employment History

How can I determine an individual's employment history using the data provided in the B2B file?

ANSWER

Although a MLO's self-reported employment history is not included in the B2B Access files, you can determine a reasonable approximation of an MLO's employment "history" for mortgage loan origination experience by looking at the following information tables in B2B:

- **State Licensed MLOs:** The **Individual Sponsorship** table contains state-regulated companies that the individual is currently or previously authorized to represent by the license referenced. By looking at the Start Dates and End Dates, the data can provide you with a “history” of an MLOs mortgage loan origination experience for the past several years. It is possible that the MLO may also have had previous employment by a federally registered institution. In order to obtain a more accurate “history”, you should also refer to the **Individual Registration** table
- **Federally Registered MLOs:** The **Individual Registration** table contains the current institution name and date the individual was first authorized to represent the institution, as well as any previous institutions the MLO was authorized to represent. By looking at the Start Dates and End Dates, the data can provide you with a “history” of an MLOs mortgage loan origination experience for the past several years. It is possible that the MLO may also have had previous employment by a state licensed company. In order to obtain a more accurate “history”, you should also refer to the **Individual Sponsorship** table.

Sponsorship vs. Employment History

Regarding NMLS ID 3353. The individual is no longer employed by Mortgage Choices, Inc. as of 9/2010; however, the individual’s sponsorship remains active and she is authorized to represent the company. Is this correct? Is this individual authorized to represent Mortgage Choice, Inc. (NMLS ID 3230) after her employment has ended? Or would we need to view the individual’s employment information to determine the true status of her sponsorship?

ANSWER

The employment history section is completed by the MLO. It is a manual entry, meaning they can enter in whatever they choose. The fact that the person is still “authorized” means that the company has not terminated their sponsorship of the MLO’s license. Sponsorship (i.e. “authorized to represent”) is created and removed by the company. So, in this scenario, the MLO has updated their employment history, indicating that they left the company, but they still hold a license and their old company has not terminated the sponsorship. This person has also become employed at a bank and has an active Federal Registration. So right now this person has dual authorities.

Renewed Through Date and Authority to Conduct Business

In January 2016 (after the renewal period has closed), if a license is displayed with a “Yes” under “Is Authorized to Conduct Business” and “2016” next to “Renewed Through”, is the licensee authorized or not authorized to conduct business in 2017?

ANSWER

If an MLO requests renewal, and the regulator has not processed it by December 31, then on January 1 the MLO will still be “authorized to conduct business”. However, since their renewal request has not been reviewed and approved, the “renewed through” date will still show as 2016. However, not all agencies allow MLOs to conduct business until their renewal is approved. Unless the regulator manually sets the authorized to conduct business indicator to No, the MLO will continue to show as authorized. Some MLOs will wait until the last minute to submit their renewal request so there will be a reasonable number of MLOs in this situation in January. But the default is to keep them approved and authorized until the regulator reviews their renewal and decides to officially approve or reject their request.

Authorized to Represent vs Employment History vs Office Location

What is the difference between Authorized to Represent, Employment History, and Office Location?

ANSWER

These items will reflect different information depending if the individual is state licensed or federally registered.

State Licensed MLOs:

1. Authorized to Represent – Indicates that a company is sponsoring the individual. In most circumstances it is fair to interpret this as “employment”.
2. Employment History – This information is self-reported. It is visible on the Consumer Access website but is not provided in the B2B data.
3. Office Locations – A sponsored MLO must be connected to either the company headquarters, or a branch location found in NMLS.

Federally Registered MLOs:

1. Authorized to Represent – Indicates the individual is employed by and holds an Active registration through a particular institution.
2. Employment History – This information is self-reported. It is visible on the Consumer Access website but is not provided in the B2B data.
3. Office Locations – For federally registered MLOs, this address is self-reported.

License Status Date Different than Status History

Why does the Status Date in the CompanyLicense file say that the license was surrendered on November 16, but the CompanyLicenseHistory file has a StartDate of November 29 for when the license was set to IsAuthorized = “No”?

ANSWER

The field “StatusDate” is manually entered by the Regulator and the NMLS allows them to “back date” the value. Many regulators choose to terminate the license effective the date of surrender (November 16). However the CompanyLicenseHistory date ranges use actual timestamps to show when the regulator took the action (November 29). B2B users should assume that the License History files represent accurate date ranges in terms of validating historical license compliance. In this example, the Consumer Access website was showing the licensee as “authorized to conduct business” until November 29. The history tables are being provided to document this and allow the industry to look back in time to see what was displayed in Consumer Access, regardless of whether a Regulator “back dates” the Status Date.

RegistrationDetail versus RegistrationHistory

What is the difference between the registration detail and registration history files and how are the dates generated?

ANSWER

The RegistrationDetail file, displays the MLO’s linked relationship with the institution and the dates shown are self-entered by institution system users. The reason for this is that an institution may have hired someone six months ago for one job, and then put them into a new position where they might need to originate residential mortgages. So their original employment date might be 2013, but their registration was not activated until 2014.

The RegistrationHistory file displays the full registration history for an MLO. The dates shown are system generated dates that are recorded when the status of the MLO’s registration is changed in the system. These dates are tied to the MLO’s registration with the federal regulator and are the best indicator for MLO registration compliance.

Regulatory Action No Longer Appears in File

Why would a regulator action listed in previous files no longer show in the recent file?

ANSWER

A regulatory Action can be removed for the following reasons:

1. The privacy code changed from a publicly viewable status to a status that is not publicly viewable in Consumer Access.

2. Consent Orders are removed from public view when they are terminated (i.e. when all items are satisfied and the Examination Unit has determined that the licensee is in a more satisfactory compliance position). They are also changed from a publicly viewable status to a status that is not publicly viewable in Consumer Access.
3. When a respondent is removed from a regulatory action.

Where do I go to find...

This table shows what file you would consult to answer the following questions. In most cases, there is a different file for State MLOs and Federal MLOs.

Question	State MLOs	Federal MLOs
Is the MLO currently authorized to originate?	IndividualLicense	IndividualAgencyRegistration
Was the MLO authorized to originated on April 17, 2012?	IndividualLicenseHistory	IndividualRegistrationHistory
Who does the MLO work for?	IndividualSponsorship	IndividualRegistrationDetail
At what address does the MLO work?	IndividualLocation	IndividualLocation