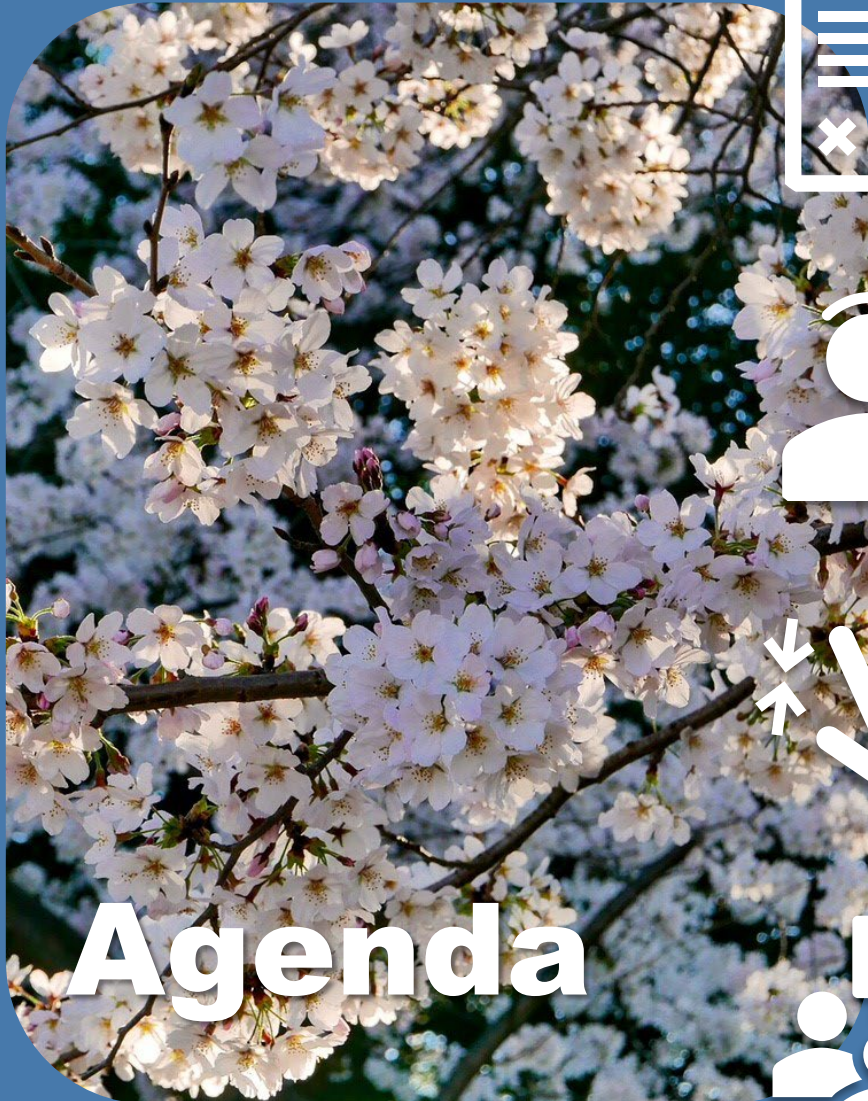


Course Provider Seminar 2023 – Day 2

Thursday June 8th



www.csbs.org / [@csbsnews](https://twitter.com/csbsnews)



Agenda



Rules of Conduct for Education
Students Policies & Best Practices



MLO Testing &
Education Customer
Support



BioSig Support



Q&A



Student Rules of Conduct Policy and Best Practices

Michelle Vander Naalt, CSBS

Peter Citera, Real Estate Institute

Elliot Long, Rocket Mortgage



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Student Rules of Conduct (ROC)

Why

1) Maintain the integrity of the Mortgage Education Program; 2) ensure all course providers are held to the same standards; 3) empower providers when rules are not followed.

Governance

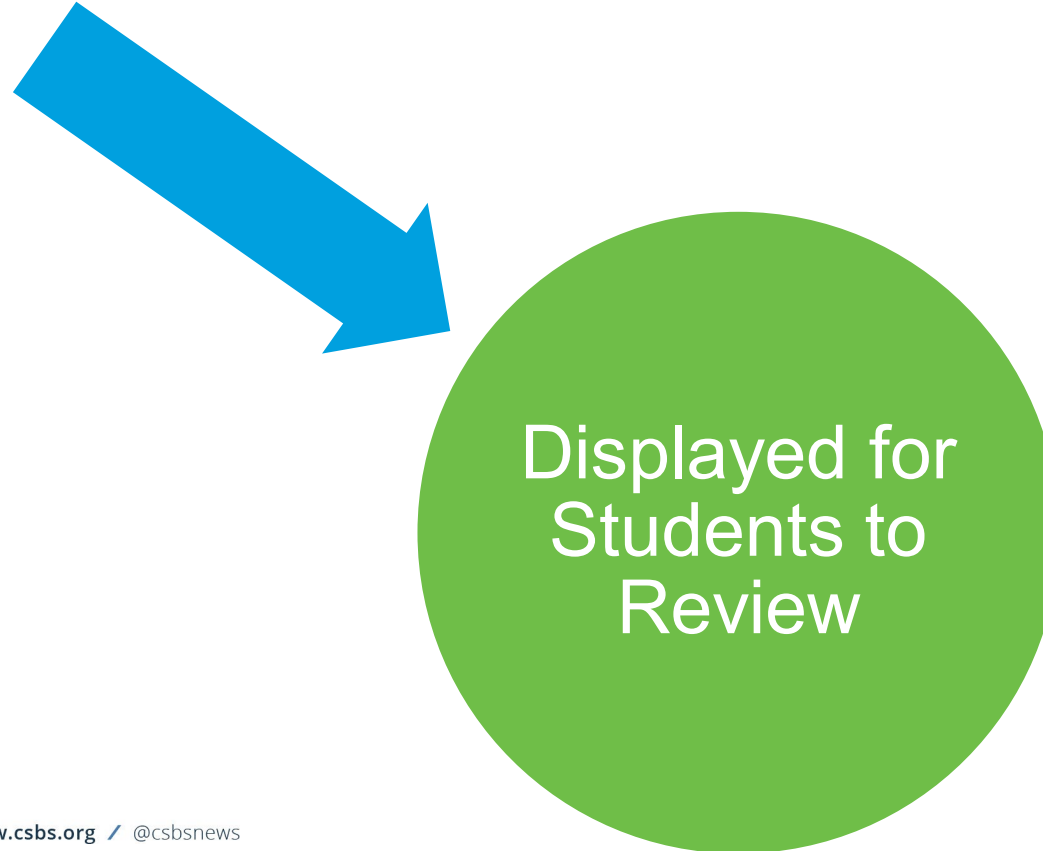
Consulted: CPWG (Industry)

Approved: MTEB (State Regulators)

Approved: NMLS Policy Committee (State Regulators)

Informed: SRR Board of Managers (State Commissioners)

Administering Student ROC Requirement



Common Compliance Issues For Providers

- Not requiring student's signatures
- Signed after the start of the course (middle or end)
- Not retaining a copy of the signed Student ROC for 5 years
- Updating LMS/Computer System upgrades and not transferring files

Violation of policies -

- Data Retention Policy
- Standard of Conduct

ROC Best Practices - Classroom

Peter Citera – Real Estate Institute

It all starts with the sign-in process

- Are you having students sign-in?
- Who is checking IDs?
- What is the process for distribution and collection of the ROCS Document?

Instructors **MUST** summarize!



ROC Best Practices - Webinar

Peter Citera – Real Estate Institute

What is your ID verification process?
Functional Specification allows:

- Knowledge-based authentication
- IDs verified on camera

How do you obtain ROCS?

- If scanned and emailed, who verifies receipt and when?
- Consider online presentation and acknowledgment. Track IP addresses.



ROC Best Practices - OSS / OIL

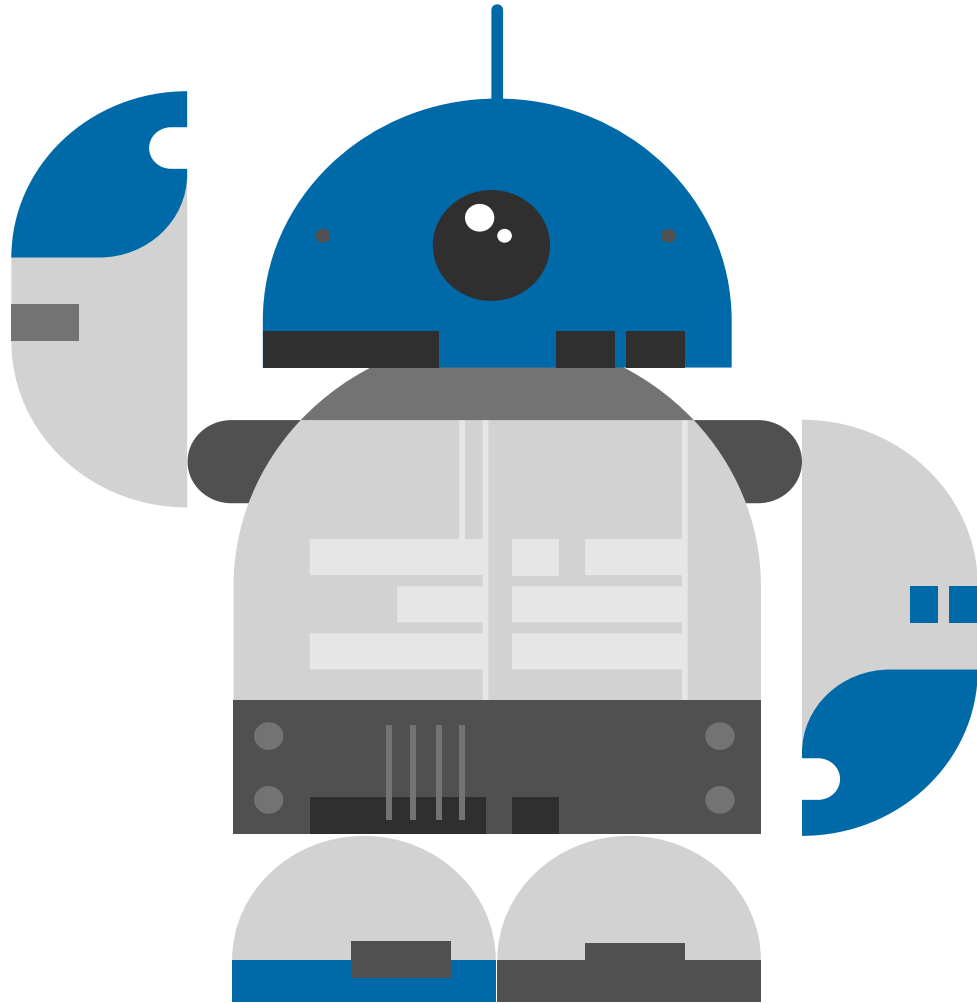
Peter Citera – Real Estate Institute

This one is probably the easiest to ensure compliance

- Biosig verifies identity
- ROCS needs to be acknowledged prior to a student beginning a course in the LMS.
- A speedbump: what happens if/when you change LMS?
 - **A change in LMS does NOT change your need to retain records for five years! (Five-year requirement applies to ALL course types.)**
 - **Create the “sunset plan” as early as possible in the process of selecting a new LMS. Work with your transitioning provider to export data and VERIFY INTEGRITY. “Whoops” isn’t a valid excuse.**



Questions?





MLO Testing and Education Customer Support

Jessica Esquina, CSBS



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MLO Testing and Education Customer Support



Completion to Compliance

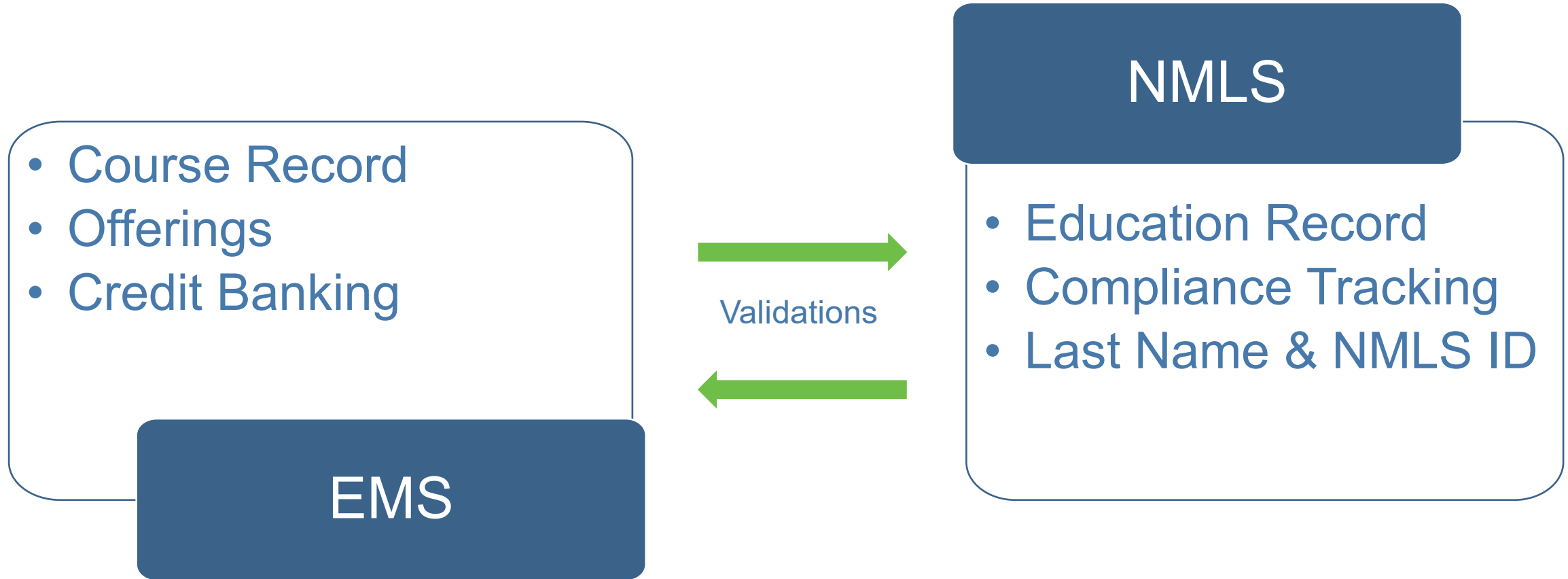


Resources



Common Questions

EMS and NMLS Interact



Course with Federal Hours

Details

Course Name	20 Hour SAFE Comprehensive: Mortgages
Instruction Method	Online Instructor-Led
Category	PE Comprehensive
State Agency	
Open to Public	Yes
Description	pe

Hours

Category	Hours
Requested Hours	20
Federal Law	3
Ethics	3
Non-Traditional	2
General Elective	12
State Elective	0
Total Approved	20



Course with State Hours

Details

Course Name	2 Hour CA-DFPI SAFE: State Law
Instruction Method	Classroom Equivalent
Category	PE Elective
State Agency	CA-DFPI
Open to Public	Yes
Description	state law

Hours


Category	Hours
<i>Requested Hours</i>	2
Federal Law	0
Ethics	0
Non-Traditional	0
General Elective	0
State Elective	2
Total Approved	2



EDUCATION MANAGEMENT SYSTEM

Education Record



Federal PE Requirements

Requirement Type	Hours Applied / Required	Compliance Status	Compliance Status Date	Last Updated Date
PE Federal Law and Regulations	3 / 3	Compliant	2/25/2022	3/4/2022
PE Ethics	3 / 3	Compliant	2/25/2022	3/4/2022
PE Non-Traditional Lending	2 / 2	Compliant	2/25/2022	3/4/2022
PE General Elective	14 / 0	N/A	N/A	4/22/2022
PE Total	22 / 20	 Compliant	2/25/2022	3/4/2022



State PE Requirements

Current Licenses

License Type	State Hours Applied / Required	Total Federal and State Hours Applied / Required	Compliance Status	Compliance Status Date	Last Updated Date
CA-DFPI Mortgage Loan Originator License	2 / 2	22 / 20	 Compliant	3/28/2022	4/22/2022
GA Mortgage Loan Originator License	0 / 0	22 / 20	 Compliant	2/25/2022	4/22/2022

Look for these...



Pending
Education Needed



Compliant
Education Met

2022 Federal CE Requirements

Requirement Type	Hours Applied / Required	Compliance Status	Compliance Status Date	Last Updated Date
CE Federal Law and Regulations	3 / 3	Compliant	5/19/2022	5/20/2022
CE Ethics	2 / 2	Compliant	5/19/2022	5/20/2022
CE Non-Traditional Lending	2 / 2	Compliant	5/19/2022	5/20/2022
CE General Elective	3 / 0	N/A	N/A	5/10/2022
CE Total	10 / 8	Compliant	5/19/2022	5/20/2022



2022 State CE Requirements

License Type	State Hours Applied / Required	Total Federal and State Hours Applied / Required	Compliance Status	Compliance Status Date	Last Updated Date
CA-DFPI Mortgage Loan Originator License	1 / 1	10 / 8	Compliant	5/19/2022	5/20/2022
GA Mortgage Loan Originator License	1 / 1	10 / 8	Compliant	5/19/2022	5/20/2022
IL Mortgage Loan Originator License	0 / 0	10 / 8	Compliant	5/19/2022	5/20/2022
IN-DFI Mortgage Loan Originator License	0 / 0	10 / 8	Compliant	5/19/2022	5/20/2022
KY Loan Originator License	1 / 1	10 / 8	Compliant	5/19/2022	5/20/2022
MI Mortgage Loan Originator License	0 / 0	10 / 8	Compliant	5/19/2022	5/20/2022
MN Mortgage Loan Originator License	0 / 1	10 / 8	Pending	1/1/2022	5/20/2022
NC Mortgage Loan Originator License	0 / 1	10 / 8	Pending	1/1/2022	5/20/2022
OH Mortgage Loan Originator License	0 / 0	10 / 8	Compliant	5/19/2022	5/20/2022
SC-BFI Mortgage Loan Originator License	0 / 1	10 / 8	Pending	1/1/2022	5/20/2022
TN Mortgage Loan Originator License	0 / 0	10 / 8	Compliant	5/19/2022	5/20/2022

Key Take-Aways

- Credit banking and Compliance happen in **real time***
- Encourage client to **log into NMLS account**
- Provide instructions on reading **Education Record**

*(except Late CE)



www.csbs.org / @csbsnews



NMLS Resource Center
nationwidelicensingsystem.org

NMLS Call Center
1-855-665-7123

NMLS Education Program
nmls.ed1@csbs.org

MLO Testing and Education Customer Support



Completion to Compliance



Resources



Common Questions

NMLS.org/Testing

News and Alerts for Testing

Test Taking Process: (1) [Pay to open an enrollment window](#) (2) [Accept the Candidate Agreement](#) (3) [Schedule an appointment](#) (4) [Study](#).

Having a problem? Check that you [agreed to the Candidate Agreement](#) or check the [MLO Testing Handbook](#).

Taking the SAFE MLO Test is like going through TSA: Know the Rules! Carefully review the [Candidate Agreement](#) and [Rules of Conduct](#) prior to testing.

Testing FAQs

- [What is on the test? See Test Content Outline](#)
- [What do I need to Know? MLO Testing Handbook](#)
- What are the rules? See [Rules of Conduct](#) and the [Candidate Agreement](#)
- [What do I do about Special Accommodations?](#)
- [How do I Cancel or Reschedule my test?](#)
- [What is the Test Retake Policy?](#)
- [Does the Test Expire?](#)
- [What is the Test Pass Rate?](#)



Four Step Test Process

[Full Details in the MLO Testing Handbook](#)

Pay in NMLS



Decide How to Test



Schedule



Prepare and Test

NMLS.org/Education

News and Alerts for Mortgage Education

Missed completing continuing education (CE) for the annual renewal period in 2022? Take [Late CE](#) course(s) to satisfy the missed CE requirement for 2022. Late CE courses are structured so that course credit is retroactively applied to the previous year.

NMLS approved education is required for MLO licensure. **Look up [MLO Education Requirements](#). Register and complete education with a [NMLS Approved Course Provider](#).**

[Late CE](#) courses are the only courses that satisfy a CE requirement for years 2022 - 2010.

Newly Licensed? Find CE requirements for this year on your [Education Record](#).

Mortgage Education Resources

Use the [MLO Education Requirements](#) to find:

- each state agency's PE and CE requirements
- PE expiration status; [PE Expiration Policy](#)
- state specific education requirements.

Log into NMLS and look at your [Education Record](#) to:

- verify your education has been reported
- see what CE is required
- see courses you previously completed

Online courses require identity authentication through [BioSig-ID](#).

Take [Late CE](#) to make-up CE from a past year.

Other [common question](#)

Quick Links

NMLS Approved
Course Providers

BioSig-ID Help

Mortgage Education
Requirements

Late CE Courses
2010-2022



MLO Testing and Education Customer Support



Completion to Compliance



Resources



Common Questions

Simple Questions = Complicated Answers

Complicating factors include:

- multiple agencies,
- changed PE requirements,
- license items,
- agency unique requirements,
- federal registrant,
- temporary authority.




**PLEASE HANDLE
WITH CARE**

Ask for help:

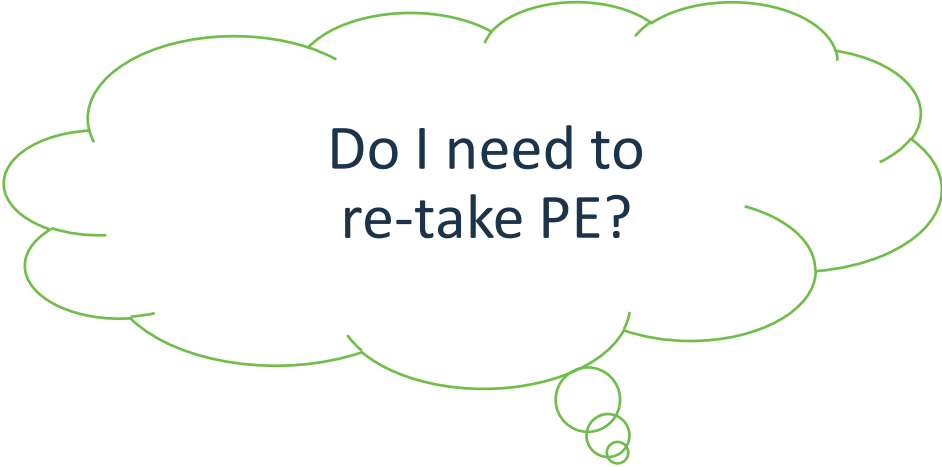
Providers use
nmls.ed1@csbs.org

Students use
NMLS Call Center
1-855-665-7123

Common Questions



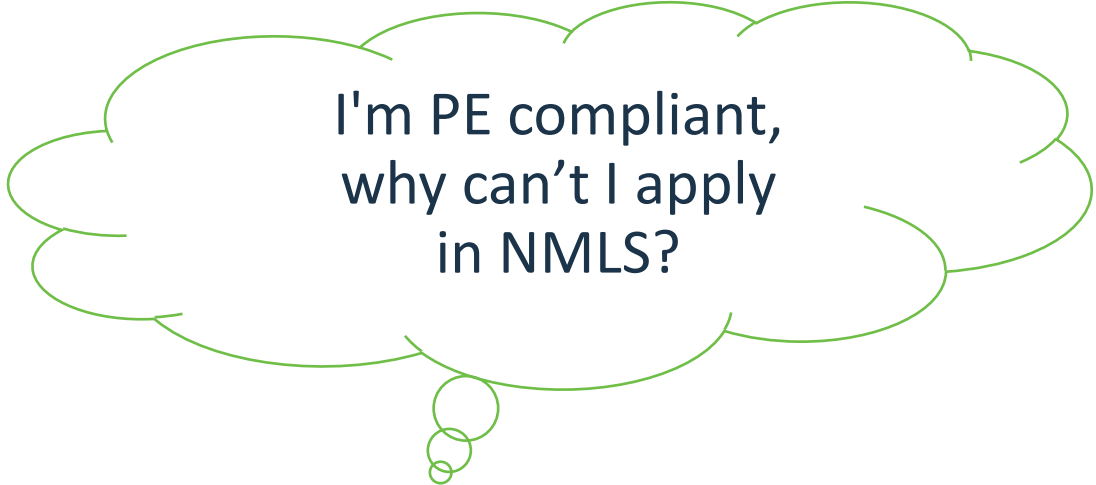
How do I
make up CE?



Do I need to
re-take PE?



Do I need to
take CE?



I'm PE compliant,
why can't I apply
in NMLS?

PE Expiration

PE expires after 3 years in the following cases:

1. fail to acquire a valid state license or federal registration as an MLO within 3 years from the date of federal compliance; or
2. fail to acquire a valid state license or federal registration as an MLO within three years from the last date of licensure or registration as an MLO.

PE Expiration

Test Your Knowledge

1. Which constitutes “left” the industry?

- a. No active MLO license
- b. No active federal registration
- c. Both

C. Both. failure to acquire or maintain a valid state license or federal registration as an MLO

2. Does PE expire after 3 years or 5 years?

3 years;

SAFE MLO Test results expire after 5 years.

SAFE MLO Test Expiration Policy

Passed test results will expire if an individual:

- Fails to obtain or maintain a valid license in any state for a period of 5 or more consecutive years
- Fails to maintain an active federal registration for a period of 5 or more consecutive years

PE Expiration

It can be complicated...

- Education requirements get more complex with multiple licenses.
- Not all agencies have adopted. Consult the State Specific Requirement resource for agency's adoption status.
- If PE expired and was retaken, NMLS must work with state agencies to address any outstanding CE requirement(s). This is a manual process.

If your student isn't sure:

You can Email: nmls.org1@csbs.org

Student can call: NMLS Call Center 1-855-665-7123

Late CE

CE requirement must be satisfied for the last year in which MLO was licensed.

- If an MLO had a requirement to complete CE and failed to do so, and as a condition for renewal or reinstatement, is required to satisfy CE for the last year in which the MLO was in a renewable status.
- An MLO who subsequently becomes unlicensed must complete the CE requirements for the last year in which a license was held prior to the issuance of a new or renewed license.

“Late CE” courses are those courses which have been specifically approved and configured, so that upon completion, course credit will be retroactively applied to the appropriate previous year.

Late CE vs Regular CE

Late CE applies to 2022 or earlier.

- ⊘ Late CE can never be applied to current year!
- ⊗ Does not post to record in real time; manually applied*

*During Jan & Feb, only comprehensive courses are applied automatically. State specific applied manually.

Regular CE applies to 2023.

- ⊘ Regular CE can never be applied to past year!
- ☑ Posts to record in real time



Meet Sam

Sam is licensed in GA and FL

Sam missed GA's CE deadline 10/31.

- Needs REGULAR CE

Sam missed FL's CE deadline 12/31.

- Needs LATE CE

Do I need take CE if I took PE & got licensed this year?

Refer to Uniform CE Policy & State-Specific Education Requirements.

Uniform CE Policy:

As a condition for license renewal, an MLO is required to complete at least eight (8) hours of CE in the same year in which a state agency placed the license in an approved status with the following exception:

An MLO who reached federal pre-licensure education (PE) compliance in the same year in which the license was approved is not required to complete CE.

Am I required to take Continuing Education this year?			
If I became federal compliant for PE between 2009 - 2022	and was licensed between 2009 - 2023	am I required to complete CE in 2023	YES
If I became federal compliant for PE in 2023	and I was approved for an initial license in 2023	am I required to complete CE in 2023	No

Do I need take CE if I took PE & got licensed this year?

Based on **Federal PE Compliance Status Date**

1. Was 2022 CE for CA and GA required?
Yes or No?

No

2. Individual got WV license this year (2023). Is 2023 CE for WV required?
Yes or No?

Yes

Federal PE Requirements

Requirement Type	Hours Applied / Required	Compliance Status	Compliance Status Date	Last Updated Date
PE Federal Law and Regulations	3 / 3	Compliant	2/25/2022	3/4/2022
PE Ethics	3 / 3	Compliant	2/25/2022	3/4/2022
PE Non-Traditional Lending	2 / 2	Compliant	2/25/2022	3/4/2022
PE General Elective	14 / 0	N/A	N/A	4/22/2022
PE Total	22 / 20	Compliant	2/25/2022	3/4/2022



State PE Requirements

Current Licenses

License Type	State Hours Applied / Required	Total Federal and State Hours Applied / Required	Compliance Status	Compliance Status Date	Last Updated Date
CA-DFPI Mortgage Loan Originator License	2 / 2	22 / 20	Compliant	3/28/2022	4/22/2022
GA Mortgage Loan Originator License	0 / 0	22 / 20	Compliant	2/25/2022	4/22/2022
WV Mortgage Loan Originator License	4 / 4	78 / 24	Compliant	1/17/2023	2/22/2023

What CE do I need?

Ask about
the



www.csbs.org

2023 Federal CE Requirements

Requirement Type	Hours Applied / Required	Compliance Status	Compliance Status Date	Last Updated Date
CE Federal Law and Regulations	0 / 3	Pending	1/1/2023	1/1/2023
CE Ethics	0 / 2	Pending	1/1/2023	1/1/2023
CE Non-Traditional Lending	0 / 2	Pending	1/1/2023	1/1/2023
CE General Elective	0 / 0	N/A	N/A	1/1/2023
CE Total	0 / 8	⚠ Pending	1/1/2023	1/1/2023



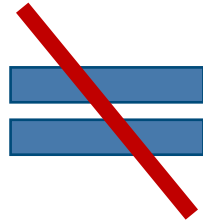
2023 State CE Requirements

License Type	State Hours Applied / Required	Total Federal and State Hours Applied / Required	Compliance Status	Compliance Status Date	Last Updated Date
AZ Loan Originator License	0 / 1	0 / 8	⚠ Pending	1/1/2023	1/1/2023
CA-DFPI Mortgage Loan Originator License	0 / 1	0 / 8	⚠ Pending	1/1/2023	1/1/2023
CO Mortgage Loan Originator License	0 / 0	0 / 8	⚠ Pending	1/1/2023	1/1/2023
IL Mortgage Loan Originator License	0 / 0	0 / 8	⚠ Pending	1/1/2023	1/1/2023
KS Mortgage Loan Originator License	0 / 0	0 / 8	⚠ Pending	1/1/2023	1/1/2023
MD Mortgage Originator License	0 / 1	0 / 8	⚠ Pending	1/1/2023	1/1/2023
MN Mortgage Loan Originator License	0 / 1	0 / 8	⚠ Pending	1/1/2023	1/1/2023
OR Mortgage Loan Originator License	0 / 2	0 / 10	⚠ Pending	1/1/2023	1/1/2023

CE is a Condition for Renewal



CE compliance



MLO License Renewal Application

SMART CE Deadlines

2023 Annual CE Deadlines

SMART Renewal Deadline: CE course reported to NMLS by **Friday, December 8**

At-Risk-to-Miss Renewal Deadline: Course reported to NMLS by Fri, Dec 15

Guaranteed to Miss Renewal Deadline: Course reported to NMLS on Fri, Dec 29

Last Day for NMLS Call Center Support: Friday, December 29



NMLS operates on Eastern Time

Manage Customer Expectations Early & Often



Credit reporting

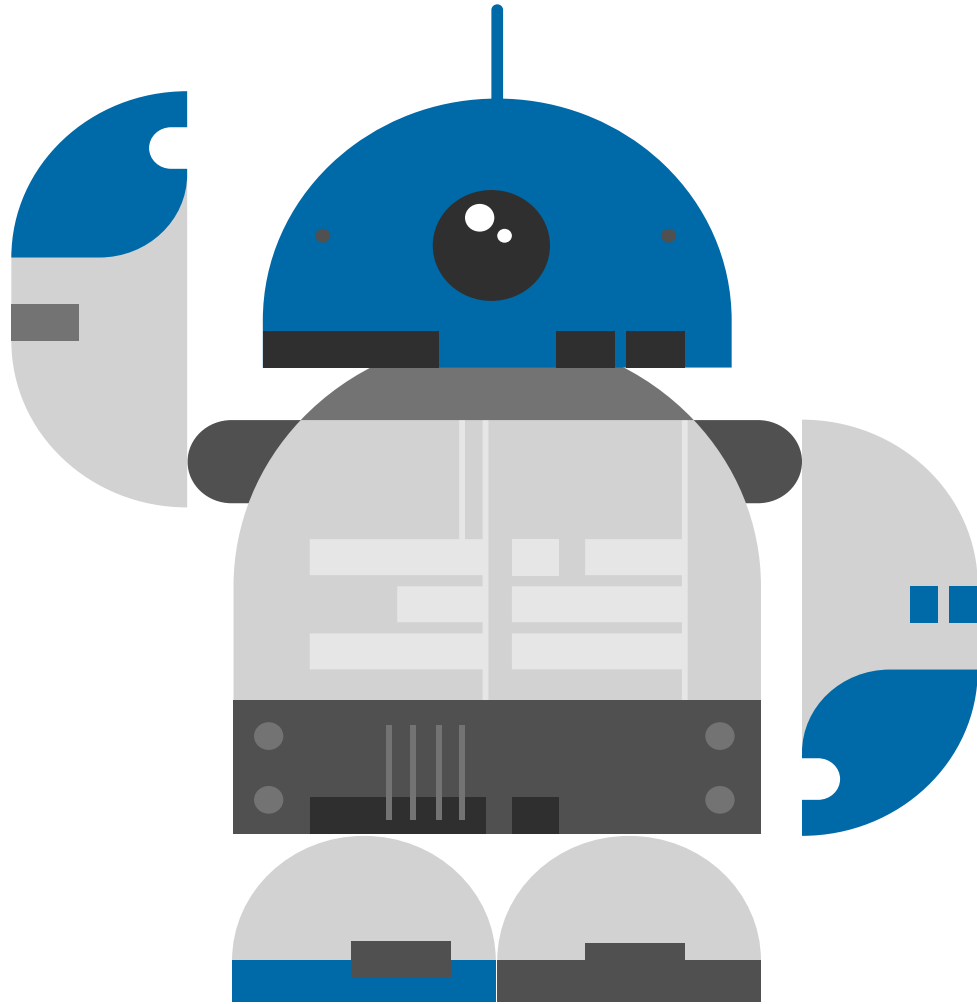
- Get **NMLS ID & Last Name as it appears in NMLS**
- Avoid calls/complaints and **credit bank daily**



Encourage CE SMART deadline

- Complete CE by Dec 8
- Ask about State-specific CE
- Remind students to **submit license renewal application by deadline**

Questions?





BioSig-ID Support

Michelle Gallagher, CSBS

Elaine Jackson, Ameritrain

James Murphy, OCL Financial Services LLC

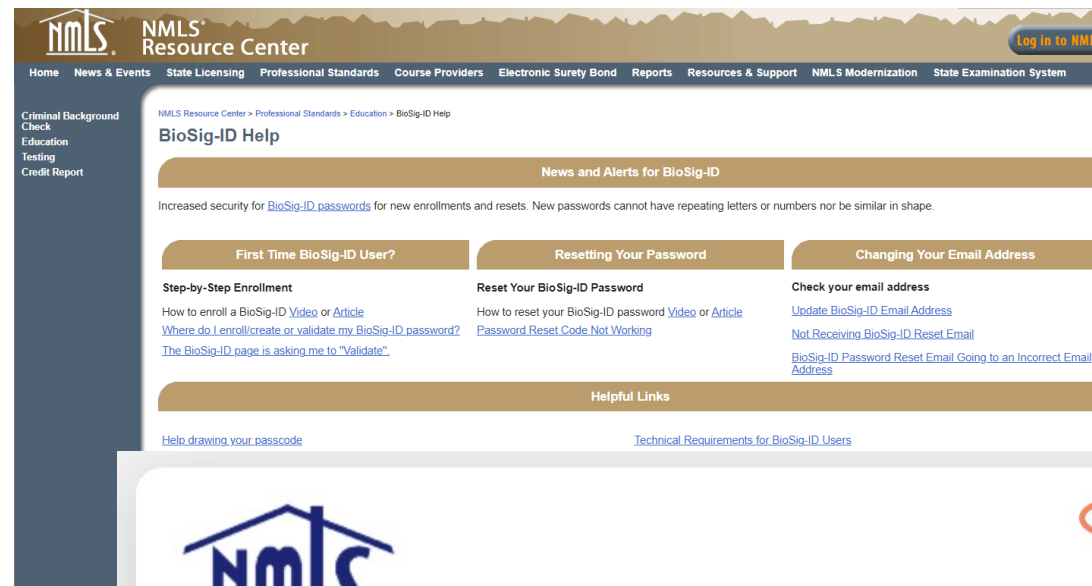


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How do you prepare your support staff for BioSig-ID™ questions?



Do you add special instructions for BioSig-ID™ authentication?

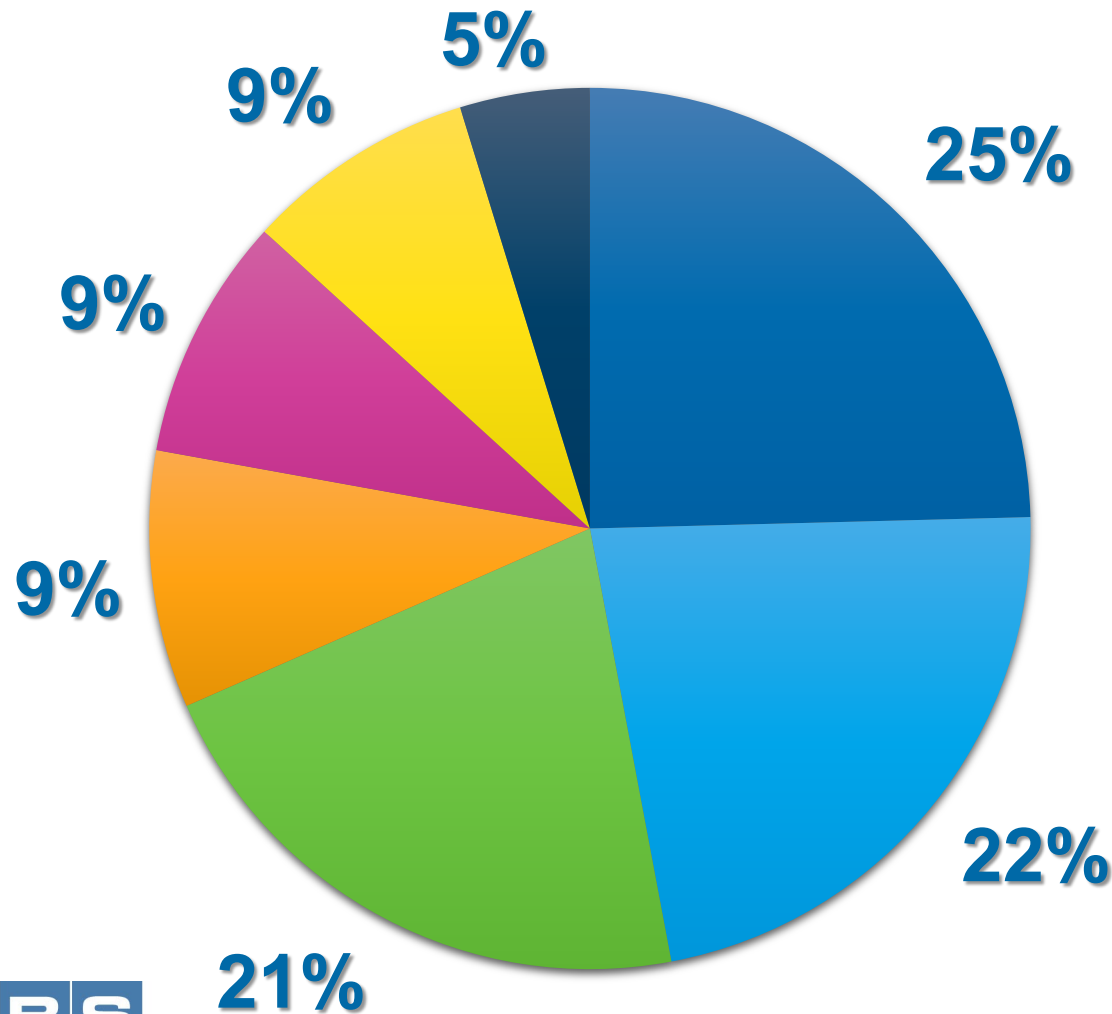


The screenshot shows the NMLS Resource Center website. The header includes the NMLS logo and navigation links: Home, News & Events, State Licensing, Professional Standards, Course Providers, Electronic Surety Bond, Reports, Resources & Support, NMLS Modernization, and State Examination System. A 'Log in to NMLS' button is in the top right. The left sidebar lists: Criminal Background Check, Education, Testing, and Credit Report. The main content area is titled 'BioSig-ID Help' and includes a 'News and Alerts for BioSig-ID' section with a message about increased security for passwords. Below this are three columns of links: 'First Time BioSig-ID User?' (Step-by-Step Enrollment, How to enroll a BioSig-ID Video or Article, Where do I enroll/create or validate my BioSig-ID password?, The BioSig-ID page is asking me to "Validate"), 'Resetting Your Password' (Reset Your BioSig-ID Password, How to reset your BioSig-ID password Video or Article, Password Reset Code Not Working), and 'Changing Your Email Address' (Check your email address, Update BioSig-ID Email Address, Not Receiving BioSig-ID Reset Email, BioSig-ID Password Reset Email Going to an Incorrect Email Address). A 'Helpful Links' section at the bottom includes 'Help drawing your passcode' and 'Technical Requirements for BioSig-ID Users'.



The screenshot shows the NMLS BioSig-ID enrollment process. It features the NMLS logo on the left and a 'Help' button circled in red. Below the logo is a progress bar with four steps: LAUNCH, 1, 2, 3, and 4. Step 1 is currently active. To the right of the progress bar is a 'Your NMLS-ID#' field. Below this is a 'Instructions' section. The BSI logo is visible in the bottom right corner.

Most asked BioSig-ID™ questions



- Password Reset
- Name corrections to update email
- How to draw, Where to draw
- Incorrect NMLS ID
- Resolved by User
- User to change email with provider
- Non-Authentication Issue

Scenario: Student attempts to reset their password

Best Courses NMLS Course Provider

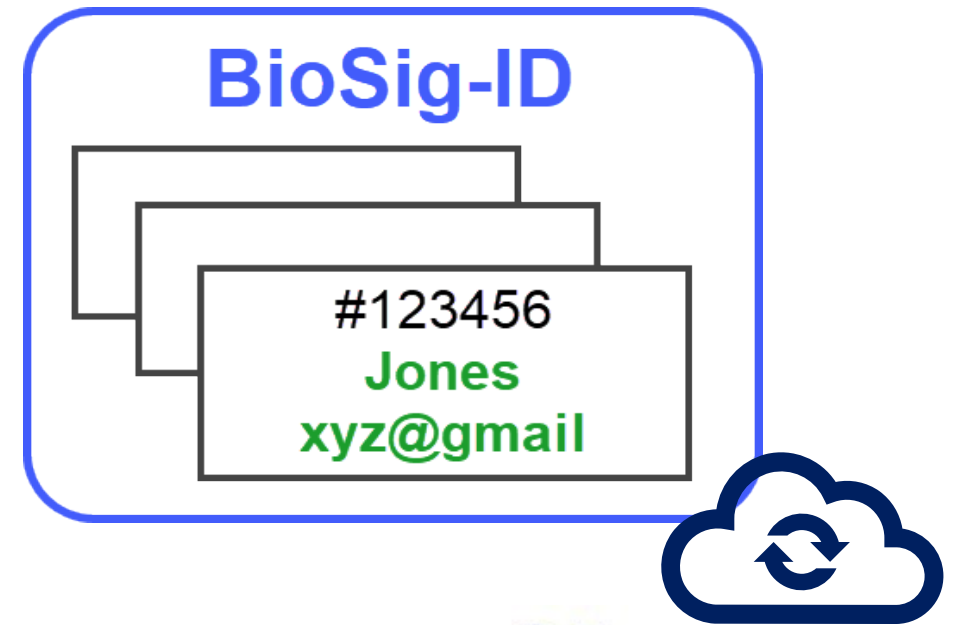
Student Name: Jessica Jones
NMLS ID: 123456
Email: xyz@gmail.com
Course: 4 hour Ethics



BioSig-ID

#123456
Smith
abc@yahoo

New Project: Lowering Student Last Name Issues



Q&A

