Nationwide Multistate Licensing System & Registry

Mortgage Call Reports

XML Specification for MCR Form Version 6

Release 2024.3

Change Log

Date	Description	Release
4/2/2024	Initial Version for Form Version 6	2024.3

1 Overview

1.1 Important Note

In the 2024.3 release with the introduction of MCR Form Version 6 (v6), the MCR filing requirements went through a significant overhaul. For this reason, this document ONLY applies to MCR V6 and later and does not apply to Form Version 5 (v5). Content from the v5 document that is relevant for v6 is still included.

1.2 Introduction

The upload feature will allow companies to streamline the filing process for Mortgage Call Reports by extracting information from their own internal systems and providing it to NMLS. An XML upload may be used in order to create an initial MCR filing, change information on a pending MCR filing or amend information on a previously submitted MCR filing.

This document provides the specification for the XML file in support of creating and updating an MCR filing. Note that this document is not intended to provide an overview of Mortgage Call Report requirements. For detailed information for Mortgage Call Reports, including an explanation of each field, please refer to the NMLS Resource Center.

1.3 Audience

This document is intended to be used by technical staff responsible for building the XML file for a Mortgage Call Report. It is expected that readers of this document have existing knowledge of XML.

1.4 Contact Information / Technical Issues

For questions or issues using the upload feature within NMLS, contact either the NMLS Call Center or your Account Administrator. The NMLS Call Center will not provide support for creating or troubleshooting XML files.

1.5 Prerequisites for Creating and Submitting MCR Filings

A company must have a submitted MU1 filing in NMLS and a mortgage related license to upload an XML file for a Mortgage Call Report. The user attempting to upload the file must have an NMLS user account with the appropriate MCR role. To determine if your account has the appropriate role to perform XML file uploads for Mortgage Call Reports, contact your Account Administrator.

2 What's New in Form Version 6

MCR v6 is a major overhaul from previous form versions. Here is a summary of the significant changes:

- 1. There are no longer different Expanded and Standard MCR form specifications. The v6 form field set is the same for all companies and is based on the v5 Expanded form. Also, the GSE Designation for mortgage companies no longer affects what companies are required to submit.
- 2. The components required in the filing by a given company are determined by the Mortgage Activity Categories of "Broker", "Lender" and "Servicer" which are derived from the company's declared Business Activities.
- 3. Also based on the Mortgage Categories, fields in appropriate sections of the RMLA component are "zero-filled".
- 4. The Annual period type is now based on the calendar year and not the fiscal year.

- 5. Fiscal period types (Fiscal Q3, Fiscal Q1, Year To Date) are no longer supported for new filings. This is true for both v5 and v6 filings. Existing filings with these period types can still be revised.
- 6. Starting on April 1, 2024, all new MCR filings will be created in a form version based on the period date as follows:

Period Type	Period Date	Form Version
Annual	2023 and earlier	V5
Annual	2024 and later	V6
Quarterly	2023/Q4 and earlier	V5
Quarterly	2024/Q1 and later	V6

2.1 Quarterly Snapshots, Business Activities and Mortgage Categories

NMLS determines what components are required in the quarterly MCR based on the Business Activities reported on the company's MU1 filing. The mortgage business activities are categorized as follows into Broker, Lender, and Servicer categories (called "Mortgage Activity Categories"). Non-mortgage activities have no category designation.

DESCRIPTION	Broker	Lender	Servicer
First mortgage brokering	Υ	N	N
First mortgage lending	N	Υ	N
First mortgage servicing	N	N	Υ
Foreclosure consulting/foreclosure rescue	Υ	Υ	Υ
High cost home loans	Υ	Υ	N
High-cost home loans - Broker	Υ	N	N
High-cost home loans - Lender	N	Υ	N
Home equity lending/lines of credit	Υ	Υ	N
Home equity lending/lines of credit - Broker	Υ	N	N
Home equity lending/lines of credit - Lender	N	Υ	N
Manufactured housing financing	Υ	Υ	N
Manufactured housing financing - Broker	Υ	N	N
Manufactured housing financing - Lender	N	Υ	N
Master servicing	N	N	Υ
Mortgage loan modifications	N	N	Υ

Mortgage loan purchasing	N	N	Υ
Other - Mortgage	Υ	Υ	Υ
Reverse mortgage activities	Υ	Υ	Υ
Reverse mortgage brokering	Υ	N	N
Reverse mortgage lending	N	Υ	N
Reverse mortgage servicing	N	N	Υ
Second mortgage brokering	Υ	N	N
Second mortgage lending	N	Υ	N
Subordinate lien mortgage servicing	N	N	Υ
Third party first mortgage servicing	N	N	Υ
Third party subordinate lien mortgage servicing	N	N	Υ
Appraisal Management Services	N	N	N
Commercial mortgage brokering or lending	N	N	N
Credit insurance services	N	N	N
Lead generation	N	N	N
Short sale	N	N	N
Third party mortgage loan processing	N	N	N
Third party mortgage loan underwriting	N	N	N

The categories are captured in the company's quarterly snapshot as follows:

- 1. At the beginning of a calendar quarter the system evaluates the Business Activities submitted on a company's latest submitted MU1 filing (regardless of designated state). If any of the activities map to a given category, that category is recorded as true for that company's quarterly snapshot for the quarter that has just began. For example, if a company recorded activities of "Home equity lending/lines of credit Lender" and "Manufactured housing financing" their snapshot would record the Broker and Lender categories as true for the snapshot.
- 2. At the end of the quarter the system again evaluates the business activities from the latest submitted MU1 filing. If a business activity is submitted that adds a category to the snapshot that category is set to true for that ending quarter's snapshot. However, categories are not taken away when evaluating the latest MU1 at the end of the quarter. Using the previous example as the basis, even if

the company removed all mortgage activities from their MU1, the Broker and Lender categories would remain true in the snapshot.

2.2 Quarterly Filing Creation

As noted above, starting in April of 2024, when creating an MCR quarterly filing, the system determines which form version is used based on the quarter selected. Starting with Q1 of 2024 and later all MCRs will be created as v6 using v6 creation rules. MCRs created for quarterly period prior to 2024/Q1 will be created as v5 using v5 creation rules.

When v6 quarterly filings are created the system creates components based on the mortgage categories set in the snapshot for that quarter as follows:

Broker	Lender	Servicer	Components
Υ	Υ	Y	FC RMLA-G RMLA (1 per state) SSSF (1 per state)
Υ	Υ	N	FC RMLA-G RMLA (1 per state) SSSF (1 per state)
Υ	N	Y	FC RMLA-G RMLA (1 per state) SSSF (1 per state)
Υ	N	N	RMLA (1 per state) SSSF (1 per state)
N	Υ	Y	FC RMLA-G RMLA (1 per state) SSSF (1 per state)
N	Υ	N	FC RMLA-G RMLA (1 per state) SSSF (1 per state)
N	N	Y	FC RMLA-G RMLA (1 per state) SSSF (1 per state)

N N	N	RMLA (1 per state) SSSF (1 per state)
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- 1. The system will create an RMLA for every state associated with the licenses in the snapshot.
- 2. The system will create an SSSF for every state associated with the licenses in the snapshot where the license type setting, SSSFRequired = Y.
- 3. RMLA components can be added to the filing for states not in the snapshot but SSSF components are only created when the setting is Y. The license type setting for SSSF is checked at filing creation and is not captured in the snapshot.

2.3 Zero Filled Fields in RMLA

When a v6 RMLA component is first created, the system uses the Broker, Lender and Servicer categories in the snapshot to "zero-fill" various sections of the RMLA based on the company's business model. For example, if the "Lender: Mortgage Activity Category in the company's snapshot is false, all numeric fields in Section II of all RMLAs in the filing are set to zero. This is just an initial setting and can be changed manually or via an upload by the user. When a filing is created via an upload, if any of the zero-filled fields are included in the upload, the value of the upload is assigned to the field, overwriting the corresponding zero-filled field value.

2.4 Annual Filing Requirement

As noted above, Annual MCR filings are now based on a calendar year and the first v6 Annual cannot be created until 1/1/2025. V5 annual filings can only be created for fiscal years 2023 and earlier.

Annual filing v6 requirements are dependent upon the mortgage categories captured in the company's quarterly snapshots for that year. Companies are only required to file an annual v6 MCR filing when at least one of their required quarterly filings did not include an FC filing. (If the company was not required to file an MCR filing for a quarter this quarter is not considered in the evaluation.) Typically, this means that only companies that report Broker activities only are required to file an Annual MCR.

The Annual MCR filing includes only the FC component. Those the v6 FC has many field changes but is primarily based on the v5 Expanded FC.

3 Upload File Process

3.1 Using the Upload Process for Filing MCRs

An XML file can be uploaded to create or amend an MCR filing as described below.

Table 1 – Creating and Amending via Uploads

Company needs to	Performed when	NMLS Action
Upload a new MCR Filing	An MCR filing does not exist (in any status) for the Company for the Reporting Period.	NMLS will create a new MCR filing and new FC, RMLA, SSSF or RMLA- General components for each component contained in the XML.

Company needs to	Performed when	NMLS Action
		In addition, NMLS will create any missing, but required, components automatically when creating an MCR filing for a quarterly period type (Q1, Q2, Q3 or Q4).
Add one or more components to a pending MCR filing	A pending MCR filing exists (Filing Status = Pending Initial or Pending Amendment) and the company wishes to add another component through an upload file. For instance, the company needs to add an RMLA for a state that is not currently represented in the MCR filing.	NMLS will add the MCR component to the MCR filing corresponding to the same reporting period without altering the data in any existing component.
Edit one or more components of a pending MCR filing	A pending MCR filing exists (Filing Status = Pending Initial or Pending Amendment) for the Reporting Period and the company wishes to update some or all the data.	NMLS will update the pending filing with the information provided in the XML. Any data elements not included in the XML file will be carried forward from the pending MCR filing. Any data elements included in the XML file without a value will be treated as an indication to clear the corresponding value in the amended MCR filing.
Amend one or more components of a processed MCR filing	An MCR filing exists in a Processed status for the Reporting Period to be edited.	NMLS will create a pending amendment to the processed MCR filing from the data elements provided in the XML file. Any data elements not present in the XML file will be carried forward from the processed MCR filing. Any data elements included in the XML file without a value will be treated as an indication to clear the corresponding value in the pending amendment to the MCR filing.

3.2 The Upload Process (Step By Step)

The following steps outline the process of uploading an XML file to NMLS to initiate creation of an MCR filing. For additional information on using the Upload feature in NMLS, please refer to the NMLS Resource Center.

- Construct an XML file conforming to the required schema (.XSD file) for the MCR format type and Form Version. For each Form Version there is separate schema for Expanded MCRs and Standard MCRs
- 2. From the Upload MCR Filing page in NMLS, locate your XML file and choose the upload button.
- 3. Wait for NMLS to immediately perform Level 1 validations (see below in **Upload Validations** section) against the XML file. If any Level 1 validations fail, the relevant message is displayed and the file is not uploaded.
 - The system will normally only display the first level 1 validation encountered since most failures prevent further validation.

- If the file is not schema-compliant, the upload will fail and include the relevant schema errors returned by the XML parsing engine.
- 4. If your file passes Level 1 validations, it will be queued for Level 2 validations (see **Error! Reference source not found.**below in **Upload Validations** section) and displayed on the MCR Upload File History page with a status of "Upload Pending".
 - Level 2 validations are generally produced within a few minutes. You can refresh the MCR
 Upload File History page to watch for the status to be updated.
 - If any of the Level 2 validations fail, the file is given a status of "Invalid" and a link is provided to view the error messages.
- 5. If the file passes Level 2 validations, the following actions are taken based on current MCR filings:
 - If you currently do not have any MCR filing (regardless of status) that matches the Year, Period Type and Period End Date of your upload file, NMLS:
 - i. Creates a new MCR filing with a status of "Pending Initial".
 - ii. Adds all the data from your upload to the MCR filing.
 - If you currently have an MCR filing in a status of "Pending-Initial" or "Pending-Amendment"
 that matches the Year, Period Type and Period End Date of your upload file, NMLS merges
 the data from the upload file with the data currently in the MCR filing according to the rule in
 the Merging Rules section.
 - If you currently have an MCR filing in a "Filing Processed" status that matches the Year, Period Type and Period End Date of your update file, NMLS creates a revision of the processed MCR filing, sets the status to "Pending-Amendment" and merges the data from the upload file with the data currently in the filing according to the **Merging Rules**.

IMPORTANT: the upload process will not submit your MCR filing. You must manually run completeness checks against each component and submit the filing in NMLS.

3.3 Upload Considerations

When attempting to upload an XML file, the following should be considered:

- XML files may only be uploaded during system hours. Visit the NMLS Resource Center for <u>Hours of Operation</u>.
- 2. XML files will be processed in near real-time; except during periods of peak system usage, when processing of uploaded files may be delayed.
- 3. While an upload is queued and before it has completed processing you will not be able to perform the following actions on an MCR filing that matches the Year, Period Type and Period End Date of the upload:
 - a. Upgrade the MCR filing from Standard to Expanded format.
 - b. Delete the MCR filing.
 - c. Delete any component in the MCR filing.
 - d. Submit the MCR filing.
 - e. Upload another file for the same Year, Period Type and Period End Date of the pending upload.
- 4. An XML file must only contain data for one Reporting Period.

4 MCR Upload File Validation and Structure

This section describes the rules for constructing a valid MCR Upload file. This includes both business rules and data schema rules.

4.1 XML Schema Validation

Your XML file must conform to the XSD schema associated with the Form Version of the MCR. Much of the validation of the upload file occurs as part of XML schema validation. There are numerous tools available for users to run their own schema validation on upload files before attempting to upload. Those tools will provide user with specific messages on what schema restrictions have failed. A file which does not conform to the correct schema definition for the filing will fail the schema validation rule in the Upload Validations section below.

Note that schema validations are run based on the form version you supply in the XML header note. If you supply a value of v5 for the formVersion attribute the system will validate against v5 rules, if you supply v6, the system will validate against v6 rules detailed below. Any formVersion values other than "v5" and "v6" will return a schema validation error.

4.2 Filing Metadata and Allowed Values

In this section we discuss various aspects of metadata required in the XML for v6 uploads. This discusson is only applicable to v6 filings.

MCR Description	MCR Header Tag
V6 Quarterly MCR	<pre><mcr formversion="v6" periodtype="MCRQ1" type="E" year="2024"></mcr></pre>

Tag	Attribute	Definition	Allowable Values
Mcr	Туре	This is a remnaint from previous form versions.	For v6 filings this value must always be "E". Any other value will raise an XML Schema validation error.
Mcr	year	The year for which the MCR filing applies.	For v6 filings, the value must be 2024 or greater.
Mcr	periodType	The period type for the MCR filing. This must only be a calendar quarter or annual.	ValueDescriptionMCRQ1Q1MCRQ2Q2MCRQ3Q3MCRQ4Q4MCRANNUALAnnual
Mcr	formVersion	The form version of the filing.	v6 If the value is "v5", the v5 validation and filing creation rules will be applied to the upload.
FC		The header tag for a Financial Condition component. There are no attributes for this tag.	N/A
Rmla	stateCode	The RMLA represents data for this state.	The two-letter postal code abbreviation corresponding to the state/territory.
Rmlag		The header tag for an RMLA General. There	N/A

Tag	Attribute	Definition	Allowable Values
		are no attributes for this	
		tag.	
Sssf	stateCode	The SSSF represents	The two-letter postal code abbreviation
		data for this state.	corresponding to the state/territory.

At least one component (FC, RMLA, SSSF or RMLA-General) header data element as shown in the following examples:

Component Type	Component Header Tag
FC	<fc></fc>
RMLA	<pre><rmla statecode="RI"></rmla></pre>
Company-Level	<rmlag></rmlag>
SSSF	<sssf statecode="RI"></sssf>

4.3 Upload Validations

Two types of validations will be conducted on XML files:

- 1. Schema and metadata validation (Level 1) to ensure that the upload file matches the expected file format. Level 1 validations are run when the file is first uploaded and the file will only upload if all Level 1 validations pass.
- 2. Data content validation (Level 2) to ensure that the upload file represents an appropriate type of Mortgage Call Report for the company. Level 2 validations are run after the file is successfully uploaded. If the file fails a Level 2 upload the status is set to "Invalid" and the data is not merged into a filing.

1.1.1 Validation Rules and Messages

Period Type	Validation Level	Rule	Message
Quarterly, Annual	1	formVersion value must be "v5" or v6".	FILE NOT UPLOADED – Only form versions v5 and v6 are currently supported.
Quarterly, Annual	1	The user must select a file.	Please select a file to upload.
Quarterly, Annual	1	The file name must have the correct extension (.xml).	FILE NOT UPLOADED - The file must be in XML format with an .xml file extension.
Quarterly, Annual	1	The file name length must be less than or equal to 50.	FILE NOT UPLOADED - The file name must not exceed 50 characters.
Quarterly, Annual	1	The size of the file must be less than or equal to 16 mb.	FILE NOT UPLOADED - The file exceeds 16 MB size limit.
Quarterly, Annual	1	All XML schema validations must pass. This includes, but is not limited to the following: (NOTE: Some of these rules may also be covered by other validations.)	FILE NOT UPLOADED - Your file does not conform to a valid MCR filing schema. Please check your file against the MCR XML Specification available on the NMLS Resource Center.

		 Only data fields valid for v6 are allowed. periodType is required and must be MCRQ1, MCRQ2, MCRQ3, MCRQ4, MCRANNUAL. type is required and must be E. year is required. For each RMLA Filing component, stateCode is required and must be a value from StateList. For each SSSF Filing component, stateCode is required and must be a value from StateList. year must be greater than 2022. The Upload file can only contain, at most, one FC component. The Upload file can only contain, at most, one RMLA-G. 	The schema validation error(s) are as follows: <validation errors="" generated=""></validation>
Quarterly, Annual	1	There must not already be an Upload file for the company with the same Year , periodType with a Status of 'New', "Split Processed', 'Processing', or "Failed Processing".	FILE NOT UPLOADED - There is an MCR Upload file in an Upload Pending status for the Year, Period Type and Period End Date indicated in this file.
Annual	1	When periodType is MCRANNUAL the Upload file must contain an FC component	FILE NOT UPLOADED - The upload must include at least one component required for the Period Type.
Quarterly	1	When periodType is not MCRANNUAL an instance of quarterly Snapshot must exist for the year and PeriodType .	FILE NOT UPLOADED - You are not authorized to create an MCR filing for the year and period provided. Your company either did not have an MU1 on file as of the period end date or the selected reporting period is prior to the date that MCR filings are accepted by NMLS.
Annual	1	When periodType is MCRANNUAL, and instance of an annual Snapshot must exist for the corresponding Year .	FILE NOT UPLOADED - You are not authorized to create an MCR filing for the year and period provided. Your company either did not have an MU1 on file as of the period end date or the selected reporting period is prior to the date that MCR filings are accepted by NMLS.
Quarterly	2	The Upload file can only contain one RMLAFiling component per state.	The upload must contain only one RMLA component per state.
Quarterly	2	The Upload file can only contain one SSSF component per state.	The upload must contain only one SSSF component per state.
Annual	1	If the PeriodType is MCRANNUAL then the Upload file must not contain any RLMA components.	FILE NOT UPLOADED - An RMLA component cannot be submitted for this Period Type.
Annual	1	If the PeriodType is MCRANNUAL then the Upload file must not contain an RLMA-General component.	FILE NOT UPLOADED - An RMLA-General component cannot be submitted for this Period Type.
Quarterly	1	If the upload does NOT contain at least one state-specific RMLA AND no RMLA exists for the Company for the same filing period (Year, Period Type, and Period End Date), then the Upload file must not contain an RMLA-General component.	FILE NOT UPLOADED - An RMLA-General component cannot be submitted because a state-specific RMLA does not exist for the same filing period.
Quarterly, Annual	1	The file must contain well formed XML.	FILE NOT UPLOADED - The file must contain well formed XML.

Quarterly	1	When neither IsLender or IsServicer is true for the snapshot corresponding to the period, the RMLA-G component must not be included.	FILE NOT UPLOADED - The RMLA-General component cannot be submitted based on your submitted business activities.
Quarterly	1	When neither IsLender or IsServicer is true for the snapshot corresponding to the period, the FC component must not be included.	FILE NOT UPLOADED – An FC component cannot be submited based on your submitted Business Activities.
Annual	1	If the PeriodType is MCRANNUAL then the Upload file must not contain any SSSF components.	FILE NOT UPLOADED – If the period type is "Annual" then the Upload file must not contain any SSSF components.
Quarterly	1	When the period type is MCRQ1, MCRQ2, MCRQ3 or MCRQ4, the year and period type must represent a period on or after the first valid V6 period.	FILE NOT UPLOADED – Prior to 2024/Q1, only form version 5 is allowed.
Annual	1	When the period type is MCRANNUAL, the year must represent a period on or after the first valid V6 period.	FILE NOT UPLOADED – Prior to 2025, only form version 5 is allowed.
Quarterly	2	The upload cannot contain an SSSF component for a state where there are no RMLA Required Licenses in the corresponding snapshot where IsSSSFRequired is Y.	The upload cannot contain an SSSF component for a state where there are no RMLA Required Licenses for the period where SSSF is required.
Annual, Quarterly	2	The period end date cannot be more than 24 months in the past and cannot be a future date.	FILE NOT UPLOADED - Period end date may not be in the future and must be no more than 24 months in the past.

If all conditions have been met, the MCR filing will be created (or amended) based on data provided in the XML file. If any condition fails, the user must upload a new XML file that satisfies all conditions.

4.3.1 **Schema Validation Notes**

Users should use the associated XSD file to understand the data requirements and ensure that their files pass this validation. The following notes are not intended to be comprehensive but should clarify common schema validation failures.

- 1. Any elements included in the upload that are not defined in the schema will cause the file to fail schema validation (#4). This includes elements valid in v5 that are no longer valid in v6. Note that some data entry fields in v5 are now calculated fields in v6 and these fields will fail schema validation.
- 2. Empty <u>numeric</u> elements (e.g. <a010_1></a010_1>) will cause a schema validation failure. Empty string elements will be accepted and will cause any data in the corresponding filing to be nulled out.
- 3. Most elements can only occur once in the file. Multiple instances of these data elements will cause a schema validation failure.
- 4. Most of the fields within the filing are restricted by custom data types. These data types are defined at the end of the XSD files and define such things as number of digits allowed before and after the decimal, minimum values, string length, allowed value lists, etc.
- 5. New to v6, child elements are not required to be in the order shown in the XSD. All that is required is that they be under the correct parent.

4.4 Merging Rules

Merging refers to the process of NMLS updating an existing MCR filing with data from a new upload file. The rules used to merge data are explained further in this section.

4.4.1 Non-List Data

Non-List data in the XML upload includes all fields except the Section I – Lines of Credit and Section I – MLOs sections of the RLMA. The following rules are used to merge data from an upload file with an existing MCR filing in the system:

- 1. Data elements within the existing filing that don't have a matching data element in the upload remain unchanged.
- 2. Data elements in the XML upload which are valid for the filing and form type but do not exist in the current filing are inserted into the filing.
- 3. Data elements in the XML upload which match data elements within the existing filing replace the data within the filing.
- 4. Data is replaced at the lowest level in the XML path. Only "leaf" nodes are affected.

#	Existing Filing Data	Upload Data	Merge Result
1, 2	<pre><scheduleasection> <a010_1>1234</a010_1> <a020_1>43</a020_1> </scheduleasection></pre>	<pre><scheduleasection> <a264_1>4321</a264_1> <a266_1>232</a266_1> </scheduleasection></pre>	<pre> <scheduleasection> <a010_1>1234</a010_1> <a020_1>43</a020_1> <a264_1>4321</a264_1> <a266_1>232</a266_1> </scheduleasection> </pre>
3	<pre><scheduleasection> <a010_1>0</a010_1> <a020_1>0</a020_1> </scheduleasection></pre>	<scheduleasection> <a010_1>1233</a010_1> </scheduleasection>	<pre><scheduleasection> <a010_1>1233</a010_1> <a020_1>0</a020_1> </scheduleasection></pre>
4	<pre><scheduleasection> <a010_1>1234</a010_1> <a020_1>43</a020_1> </scheduleasection></pre>	<pre><scheduleasection> </scheduleasection></pre>	<pre> <scheduleasection> <a010_1>1234</a010_1> <a020_1>43</a020_1> </scheduleasection> Note that the empty section on upload does not affect the filing data. Only leaf notes are compared. </pre>

4.4.2 List Data

There are five sections within the MCR components that contain list data:

Component	Section	Heading
RMLA	Section I	MLO(s)
RMLA	Section III	Loans Serviced Under MSRs
RMLA	Section III	Loans Serviced For Others
RMLA	Section III	Loans Serviced By Others
RMLA-General ¹	n/a	Lines of Credit

The system merges upload data in these sections differently than non-list data. In the upload file these records can contain an optional <ItemId> element. The value in this element corresponds with the "Record ID" column in MCR filing. List data from an upload is handled based on the following rules:

- 1. Records that do not include the <ItemId> element are added to the filing regardless of whether they may be duplicates. The system assigns an Item ID value to the record.
- 2. Records that do include the <ItemId> element are compared by the Item ID value against data in the filing:
 - a. When the Item ID value in the upload matches a record in the filing, the record in the filing is updated with the data from the upload.

Note that previously, in Form Version "v1", the Lines of Credit section was part of the RMLA component. Revision Date: 4/2/2024

b. When the Item ID value in the upload does not match a record in the filing, the upload record is discarded.

The following example illustrates the rules described above.

A filing is first created using an upload which contains the following MLO data. (Note that in this
example the complete XML is shown. Further examples in the section only display the relevant XML
for brevity's sake.):

```
<Mcr type="E" year="2011" periodType="MCRQ1">
       <Rmla stateCode="IA">
               <ListSectionOfSectionIMlosItem>
                      <DetailItemList>
                              <SectionIMlosItem>
                                      <ACMLO>367024</ACMLO>
                                      <ACMLO 2>11234500</ACMLO 2>
                                      <ACMLO 3>21</ACMLO 3>
                              </SectionIMlosItem>
                              <SectionIMlosItem>
                                      <ACMLO>367026</ACMLO>
                                      <ACMLO 2>49008227</ACMLO 2>
                                      <ACMLO 3>15</ACMLO_3>
                              </SectionIMlosItem>
                              <SectionIMlosItem>
                                      <ACMLO>367027</ACMLO>
                                      <ACMLO_2>0</ACMLO_2>
                                      <ACMLO_3>0</ACMLO_3>
                              </SectionIMlosItem>
                       </DetailItemList>
               </ListSectionOfSectionIMlosItem>
       </Rmla>
</Mcr>
```

2. Once the upload has completed processing the MLO section of the RMLA in the pending filing will look like this:

	Record ID	MLO NMLS ID	Employee Name	Amount (\$)	Count (#)
ď×	1	367024	Ruth, George H	11,234,500	21
⊠ ×	2	367026	Cobb, Tyrus A	49,008,227	15
⊠ ×	3	367027	Ryan, Lynn Nolan	0	0
		Totals:	3	60,242,727	36
+ Ad	d New				

- 3. This section can be updated in a number of ways depending upon the inclusion or exclusion of the Item ID:
 - a. New records without the Item ID

If the following records were subsequently uploaded without an Item ID tag, they would be added to the filing regardless of whether or not the upload contained duplicates. The system currently does not identify duplicate records and it is up to the user to ensure there are not duplicate records in list data.

<SectionIMlosItem>

	Record ID	MLO NMLS ID	Employee Name	Amount (\$)	Count (#)
⊠ ×	1	367024	Ruth, George H	11,234,500	21
♂ ×	2	367026	Cobb, Tyrus A	49,008,227	15
♂ ×	3	367027	Ryan, Lynn Nolan	0	0
♂ ×	4	367027	Ryan, Lynn Nolan	0	0
⊠ ×	5	367030	palmer, james	545,333	3
		Totals:	5	60,788,060	39



b. Updating records using Item ID - Example 1

In order to update a record in the list you would include the <ltemId> tag in the XML record. The value of the Item ID must correspond to the Record ID value shown in the Filing. Uploading the following XML after step 2 will produce the data shown immediately following. Note that for the second record no update or insert was performed since no record where ID = 6 exists in the filing data.

	Record ID	MLO NMLS ID	Employee Name	Amount (\$)	Count (#)
✓ ×	1	367024	Ruth, George H	11,234,500	21
♂ ×	2	367026	Cobb, Tyrus A	49,008,227	15
⊠ ×	3	367027	Ryan, Lynn Nolan	123,456	12
		Totals:	3	60,366,183	48



c. Updating records using Item ID - Example 2

Note that when updating a record using the Item ID, only the supplied values are replaced. Uploading the following XML after step 2 produces the results immediately following:

	Record ID	MLO NMLS ID	Employee Name	Amount (\$)	Count (#)
⊠ ×	1	367024	Ruth, George H	11,234,500	21
⊠ ×	2	367026	Cobb, Tyrus A	49,008,227	15
⊠ ×	3	367027	Ryan, Lynn Nolan	999,999	9
		Totals:	3	61,242,726	45

