March 16, 2022

On October 18, 2021, the Conference of State Bank Supervisors (CSBS) invited public comments on the proposed changes to the NMLS Money Services Business Call Report (MSBCR). After the MSBCR Subcommittee reviewed the comments, CSBS summarized the responses in the following document. With the feedback received, the MSBCR Subcommittee and CSBS intend to publish a final specification of the MSBCR revisions that will be implemented.

**Goal of the NMLS Money Services Businesses Call Report**

The Money Services Businesses (MSB) Call Report (MSBCR) was developed with the goal of enhancing and standardizing the information available to state regulators concerning the activities of their Money Services Businesses licensees (money transmitters, check cashers, prepaid, etc.). The report includes national and state specific MSB activity information that is submitted on a quarterly and annual basis.

**Background**

The proposed updates aim to clarify and correct definitions related to the financial condition, permissible investment, and virtual currency sections of the MSBCR. The following summarizes the proposed changes:

1. Edits to definitions and titles of existing virtual currency line items:
   - Updated definition of line items TA 180-250 and ST 180-250
2. New virtual currency line items TA 260-320 and ST 260-320
3. Correction to definition of existing permissible investment line item PI 180
4. Edits to definitions and titles of existing financial condition line items FC 90, 630, 680.

**Responses to Comments**

**Transmissions**: One commenter suggested clarifying stored value transactions from transmissions, noting that TA 280/TA 290 would be a subset of TA 300/TA 310. The same issue persists for the state schedule.

**Response**

An FAQ will be added to clarify the act of transmission from stored value. Stored value transactions involve only one customer.

Q: What is a transmission that is not an exchange transaction?
A: A transmission is a one-way transaction involving only a sender and receiver. These are transmissions to another wallet not owned by the customer initiating the transaction.

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1 Information about NMLS can be found at [http://mortgage.nationwidelicensingsystem.org/Pages/default.aspx](http://mortgage.nationwidelicensingsystem.org/Pages/default.aspx)
2 See Addendum A
**TA 190/TA 210**: One commenter requested guidance as to what qualifies as acceptable U.S. Dollar exchange datapoints to determine the blended index.

*Response*

Please see existing [MSB Call Report FAQ](#): Q: My company has virtual currency assets; how do I calculate a U.S. Dollar value for them? A: Virtual currency valuation must be in U.S. Dollars and should be based on a generally accepted exchange rate and the licensee, when requested, should be able to document and substantiate how they arrived at the valuation.

**TA 200**: One commenter asked if U.S. Dollar transactions include or exclude transactions involving U.S. Dollar stablecoins.

*Response*

Fiat-based stablecoins may considered Virtual Currency transactions and should be reported accordingly.

**Crypto Loans**: One commenter requested clarification about whether crypto loans should be reported on the MSB Call Report.

*Response*

Licensees should consult with their regulator about crypto loans and if they should be reported on the MSB Call Report.

**Types of Crypto**: One commenter asked if granular data for the type of crypto involved in the transaction would be reported.

*Response*

More granular data for crypto is not collected on the MSB Call Report at this time.
### Addendum A

**NMLS MSBCR**

**Subcommittee**

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