

## NMLS MCR Enhancements – 2015.1

Below are the changes to the NMLS Mortgage Call Report (MCR) that will be incorporated into the NMLS 2015.1 release, scheduled for January 26, 2015. Although these enhancements will be included in NMLS release 2015.1, their implementation and enforcement will be staggered throughout the year. Users will first see these changes available on April 1, 2015 – the first day a user may create a Q1 2015 filing.

The changes below will affect the Residential Mortgage Loan Activity Report (RMLA) for Standard filers and both the RMLA and the Financial Condition (FC) for Expanded filers. Please review the changes as they may relate to the submission of Q1 2015 data, and subsequent MCR filings. If you have any additional questions, please refer to the [NMLS Resource Center](#) or contact the NMLS Call Center at 1-855-NMLS-123 (1-855-665-7123).

### Qualified Mortgage (QM) Fields

Included in NMLS release 2015.1 is the addition Qualified Mortgage (QM) fields. These new data fields will require filers to report the number and dollar amount of Qualified Mortgage (QM) and Non-QM loans on the state-specific RMLA and company Financial Condition section (FC). All companies completing the MCR will be required to submit amount and count information on general QM status of closed and funded loans on the state specific RMLA, as well as the held for investment (HFI) value of these loans on the FC. QM and non-QM loan reporting will be system enforced starting with the first quarter 2015 MCR filings.

New data entry fields (Standard and Expanded):

- Qualified Mortgage (QM) (AC920) – Standard and Expanded
- Non-Qualified Mortgage (AC930) – Standard and Expanded

New data entry fields (Expanded only):

- Qualified Mortgage (QM) (A060W1) –Expanded
- Non-Qualified Mortgage (A060W2) –Expanded

New calculated fields:

- Total QM and Non-QM (AC990) – Standard and Expanded
- Total Loans (A060W9) –Expanded

### Nationwide Servicing and New State Specific Servicing Fields

The addition of nationwide servicing information fields will be integrated into the Company-level RMLA for all MCR filers - Expanded and Standard, to report, as well as additional state-specific servicing information for all Expanded filers to report. The reporting of nationwide servicing data will be system enforced for all filers starting with the first quarter 2015 MCR filings and for Expanded filers for state specific servicing information.

New data entry fields (Standard and Expanded):

- Wholly Owned Loans Serviced (LS010) – Standard and Expanded
- Loans Serviced Under MSRs (LS020) – Standard and Expanded
- Subservicing for Others (LS030) – Standard and Expanded

- Subservicing by Others (LS040) – Standard and Expanded
- Loan Servicing Transferred In During the Period (LS100) – Standard and Expanded
- Loan Servicing Transferred Out During the Period (LS110) – Standard and Expanded
- Less than 30 Days Delinquent (includes loans that are not delinquent) (LS200) – Standard and Expanded
- 30 to 60 Days Delinquent (LS210) – Standard and Expanded
- 61 to 90 Days Delinquent (LS220) – Standard and Expanded
- 91 or more Days Delinquent (LS230) – Standard and Expanded
- Closed Loans with Servicing Retained During the Quarter (AC1200) – Standard and Expanded
- Closed Loans with Servicing Released During the Quarter (AC1210) – Standard and Expanded

New data entry fields (Expanded only):

- Wholly Owned Loans Serviced (S510) –Expanded
- Loans Serviced Under MSR's (S520) –Expanded
- Subservicing for Others (S530) –Expanded
- Subservicing by Others (S540) –Expanded
- Fixed Loans Serviced (S600) –Expanded
- ARM Loans Serviced (S610) –Expanded
- Government (FHA/VA/RHS) Loans Serviced (S700) –Expanded
- Prime Conforming Loans Serviced (S710) –Expanded
- Prime Non-Conforming Loans Serviced (S720) –Expanded
- Other Loans Serviced (S730) –Expanded
- Closed-End Second Mortgages Loans Serviced (S800) –Expanded
- Funded HELOCs Loans Serviced (S810) –Expanded
- Reverse Mortgages Loans Serviced (S820) –Expanded
- Commercial Mortgage Loans Serviced (S830) –Expanded
- Other Loans Serviced (S840) –Expanded
- Equals 60% or less (S1000) –Expanded
- Greater than 60% but less than or equal to 70% (S1010) –Expanded
- Greater than 70% but less than or equal to 80% (S1020) –Expanded
- Greater than 80% but less than or equal to 90% (S1030) –Expanded
- Greater than 90% but less than or equal to 100% (S1040) –Expanded
- Greater than 100% (S1050) –Expanded
- NMLS ID, Owner Name, Pool #, UPB, and Loan Count (S520A) –Expanded
- NMLS ID, Owner Name, Pool #, UPB, and Loan Count (S530A) –Expanded
- NMLS ID, Servicer Name, Pool #, UPB, and Loan Count (S540A) –Expanded

New calculated fields (Standard and Expanded):

- Total Servicing Activity (LS090) – Standard and Expanded
- Total Loans Transferred In and Out During the Period (LS190) – Standard and Expanded
- Total Loans Serviced (LS290) – Standard and Expanded
- Total Closed Loans (AC1290) – Standard and Expanded

New calculated fields (Expanded only):

- Totals Loans Serviced (S590) –Expanded
- Total Rate Type (S690) –Expanded
- Total Residential First Mortgage Loans Serviced (S790) –Expanded
- Total Other Mortgage Loans Serviced (S890) –Expanded

- Total Mortgages Serviced (S900) –Expanded
- Total Mortgages Serviced (S1090) –Expanded
- Total Loans Serviced Under MSRs (S520TOT) –Expanded
- Total Loans Serviced for Others (Subservicing) (S530TOT) –Expanded
- Total Loans Serviced by Others (S540TOT) –Expanded

### **Change in Application Amount Fields**

Fields to capture changes in application amount will be added to the Application Data section of the State-specific RMLA. All company filers will be able to indicate the overall increase or decrease in the loan amounts from an application to the closed loan, if applicable. These fields will be available for reporting beginning the first quarter of 2015, but system enforcement will be delayed until the first quarter of 2016.

New data entry fields (Standard and Expanded):

- Net Changes in Application Amount (decreases should be reflected as negative) (AC065) – Standard and Expanded

New calculated fields (Standard and Expanded):

- Total Application Pipeline (AC066) – Standard and Expanded
- Total Application Pipeline Results (AC090) – Standard and Expanded

### **New Warnings/Completeness Checks**

New Warnings/Completeness Checks (Standard)

- On the Standard RMLA-G a Completeness Check will be added to require an Explanatory Note if Data Warnings exist.

New Warnings/Completeness Checks (Standard and Expanded):

- Under RMLA Section 1– Application Data, a data validation warning will be added that a note (ACNOTE) must be provided if at least one warning appears on the filing. This warning will be applicable to both Standard and Expanded filers.
- Under RMLA Section 1– Closed Loan Data, a completeness check will be added to verify that amount and count of Total Loan Type - Reverse Mortgages (AC790\_1\_T / AC790\_2\_T, AC790\_3\_T / AC790\_4\_T, AC790\_5\_T / AC790\_6\_T) must equal Total Purpose of Reverse Mortgage (AC890\_1\_T / AC890\_2\_T, AC890\_3\_T / AC890\_4\_T, AC890\_5\_T / AC890\_6\_T) respectively. This completeness check will be applicable to both Standard and Expanded filers.
- Under RMLA Section 1– Application Data, a data validation warning will be added to verify that the amount and count of the Total Application Pipeline (AC066\_1\_T, AC066\_2\_T, AC066\_1\_T / AC066\_2\_T, AC066\_3\_T, AC066\_4\_T, AC066\_3\_T / AC066\_4\_T) must equal the amount and count of Total Application Pipeline Results (AC090\_1\_T, AC090\_2\_T, AC090\_1\_T / AC090\_2\_T, AC090\_3\_T, AC090\_4\_T, AC090\_3\_T / AC090\_4\_T) respectively. This warning will be applicable to both Standard and Expanded filers.
- Under RMLA Section 1- MLO(s) a completeness check will be added to verify that amount and count of Loans Closed and Funded equals the amount and count of Total QM and Non-QM

loans, which also equals the amount and count of Total Closed Loans under Mortgage Loan Originator Data section.  $(AC070\_1\_PD = (AC490\_1\_T + AC490\_3\_T) = ACMLTOT\_2\_T)$  and  $(AC070\_2\_C = (AC490\_2\_T + AC490\_4\_T) = ACMLTOT\_3\_T)$ . This completeness check will be applicable to both Standard and Expanded filers.

- Under RMLA Section 1- MLO(s) a completeness check will be added to verify the amount and count of Loans Closed and Funded equals the amount and count of Total Serviced Loans, which also equals the amount and count of Total Closed Loans under Mortgage Loan Originator Data section.  $(AC070\_1\_PD = AC1290\_1\_T = ACMLTOT\_2\_T)$  and  $(AC070\_2\_C = AC1290\_2\_T = ACMLTOT\_3\_T)$  This completeness check will be applicable to both Standard and Expanded filers.
- Under RMLA – General, a data validation warning will be added that a note (NOTE) must be provided if at least one warning appears on the filing. This warning will be applicable to both Standard and Expanded filers.

#### New Warnings/Completeness Checks (Expanded only):

- On the Financial Condition, a completeness check will be added to verify that Total Mortgage Loans, UPB (before adjustments) of HFI, at Amortized Cost (A060W\_3\_T) equals Total Qualified and Non-Qualified Mortgages, HFI, at Amortized Cost (A060W9\_3\_T). This completeness check will be applicable to Expanded filers.
- On the Financial Condition, a completeness check will be added to verify that Total Mortgage Loans, UPB (before adjustments) of HFI, at Fair Value (A060W\_4\_T) equals Total Qualified and Non-Qualified Mortgages, HFI, at Fair Value (A060W9\_4\_T). This completeness check will be applicable to Expanded filers.

NOTE: Data Warnings will not prevent submission of a FC, however, users must acknowledge that the warnings exist prior the marking a FC as 'Ready to Submit.' Users must provide an explanation if they continue with the filing and the data validation exists.

#### Miscellaneous

A "Fill blanks with zero button" and a "Save" button have been added to the top of Schedule A, B, C and D of the Standard FC and to the top of Schedule A, B, C, D and O of the Expanded FC.

On the expanded version of the MCR, the following fields have been included in addition to those outlined above. These fields will be required for reporting starting the first quarter of 2015.

#### New data entry fields (Expanded only):

- Mortgage Loans Modified Under HAMP (S115) –Expanded
- Loans Paid Through Short Sale (S460) –Expanded

#### New label on existing field (Expanded only):

- Loan Modifications completed (non-HAMP) (S110) –Expanded

#### Definition of "Application"

SRR is introducing a clarified definition of “Application” to address the issue of various definitions of “application” in state and federal law. These various definitions create challenges when collecting loan origination information and comparing the different reporting requirements and interpretations of what constitutes an “application” for purposes of state, federal, and MCR purposes.

The following, revised definition is offered as guidance starting in the first quarter of 2015. Absent further guidance from state regulators, this revised definition will have full system enforcement the first quarter of 2016. This will be applicable to all MCR filers - Expanded and Standard.

- An application is an oral or written request for an extension of credit encumbering a 1-4 family residential property. Exclude any commercial/business/investment purpose encumbrances from reporting. Include inquiries or Pre-Qualification requests that result in denial of credit. The application date used is either (1.)The date on the initial 1003 with the borrower’s signature; (2) The date of an oral request for extension of credit, with deference to the initial1003; (3) Inquiries and Pre-Qualification requests, if declined, should use the denial date. Examples of requests that are considered an application for the NMLS MCR include, but are not limited to, purchase of owner occupied 1-4 family residential properties including 2nd homes and vacation homes; construction of 1-4 family residential properties (as described above) made directly to the consumer; non-commercial liens on residential properties (Lines of Credit should be reported at maximum approved credit line); pre-approvals on item #1 even if a residential property has not been identified; reverse mortgages – regardless of purpose; refinance loans on all of the above; all requests for extensions of credit to purchase residential property that result in the issuance of an ECOA notice.

The below definition of “application” will be in use for 2015 MCR reporting.

- An oral or written request for a home purchase loan, a home improvement loan, or a refinancing that is made in accordance with procedures used by a financial institution for the type of credit requested (Per Reg B). Examples of requests that are considered an application for the NMLS MCR include, but are not limited to, any HMDA reportable application, pre-approval requests, request without a property address, or requests which include access to the borrower's credit information.