



AD HOC REPORT REQUEST POLICY FOR
INDUSTRY

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BACKGROUND

The State Regulatory Registry LLC (SRR¹) provides two types of reporting of licensing data from NMLS for state and federal industry users of NMLS.

- 1) Reports in NMLS
- 2) Ad Hoc Reports

REPORTS IN NMLS

NMLS provides companies and institutions the ability to run a variety of reports concerning their company, branch and/or mortgage loan originator licensing/registration data within the system. These standardized reports are intended to provide company users with basic reporting capability to manage compliance with state and federal regulations and NMLS policies. These reports are limited but change over time based on user feedback.

There is not a charge for the reports that are run within the Reports and Renewals tab in NMLS.

For more information on these reports, you may click on the following links:

[Company Report Samples](#)

[Institution Report Samples](#)

AD HOC REPORTS

On occasion, an NMLS user may require information that is not available through a system report. NMLS provides system users with the ability to request additional information in the form of an “ad hoc” report. Ad hoc reports require unique programming to run the specific query as well as the involvement of operational and technical support staff to work with the requester to ensure the report captures what is intended. SRR staff will work with the entity individually to develop the report parameters. Upon confirmation of the report parameters, the request will be submitted to FINRA² for programming. The charge for an ad hoc report will be \$180 per hour that it takes to develop, schedule and run the report.

With implementation of new internal processes within institutions (company and federal), as well as changes in state and federal policies and ongoing SAFE Act mandates, institutions/companies are implementing bulk review processes of existing NMLS data on their mortgage loan originators for the purpose of performing audits against their internal systems.

The information requested may or may not include sensitive data, such as the results of criminal background checks (institutions only) and Social Security Numbers. To accommodate these requests, SRR has developed a policy to address the two categories of ad hoc report requests, which are:

- Security Level 1 Data (NPPI* data, credit report data, Criminal History Record Information (CHRI), indicating that a Record of Arrest and Prosecution (RAP) Sheet does or does not exist.)
- Security Level 2 Data (Data that is not considered Security Level 1 data)

*NPPI data consists of:

¹ State Regulatory Registry LLC (SRR) is a nonprofit subsidiary of the Conference of State Bank Supervisors (CSBS) that operates NMLS on behalf of state financial services regulatory agencies.

² FINRA is a third party contractor offering certain technology solutions for SRR.

- First name or first initial and last name plus:
- Social Security number (SSN) Financial account number(s) (brokerage account number, credit card numbers, checking account number, etc.)
- State driver's license or state identification number
- Biometric information (fingerprints, retina scans, etc.)

The following information shall be treated as NPPI when it is displayed with the first name or first initial and last name in NMLS:

- A Company's Employer Identification Number (EIN)
- An Individual's Social Security Number (SSN)
- An Individual's Government-Issued Identification Number
- An Individual's Passport Number
- An Individual's Full Date of Birth (DOB)

NOTE: State-Licensed companies may not request individual CHRI results or credit reports. This information is available to only the relevant state regulatory agencies. For Federal Registry purposes, information that may be requested includes CHRI results.

DATA REQUEST PROCESS

SECURITY LEVEL 1 REQUESTS

Security Level 1 Report requests will be submitted to the [NMLS Report Requests](#) email in-box for processing. Institutions and companies requesting the ad hoc report will need to provide the following information:

- Entity NMLS IDs for subject report:
 - Name of Company/Institution:
 - Address of Company/Institution:
 - Contact Person: (account administrator authorized to request report)
 - Contact Phone Number:
 - Authorized Recipient: (recipient must have the following roles in NMLS as applicable to the request):
 - View Confidential Information
 - View CBC Results
 - Recipient Email Address (must be NMLS user account email address)
 - Email Address of report recipient (must be NMLS user account email address)
- 1) After receipt of the necessary information, SRR will verify that the requestor is an NMLS Account Administrator for the requesting institution/company and the recipient has the proper roles assigned in NMLS. Requests submitted by unauthorized company representatives will be rejected.
 - 2) SRR will clarify the information requested (if necessary) with the requestor to ensure that the data returned in the report meets the requestors requirements.
 - 3) For reports containing Security Level 1 data, SRR will also send the NMLS Terms of Use (attached) and, if applicable, the "View CHRI Results and Content Agreement" (attached). Once

the requester has responded that he has reviewed the conditions and agrees to abide by the contents, the report request will be submitted to FINRA for fulfillment of the request.

Security Level 2 requests

Security Level 1 Report requests will be submitted to the [NMLS Report Requests](#) email in-box for processing. Institutions and companies requesting the ad hoc report will need to provide the following information:

- Request Type: (report parameters)
 - Entity NMLS IDs for subject report:
 - Name of Company/Institution:
 - Address of Company/Institution:
 - Contact Person: (account administrator authorized to request report)
 - Contact Phone Number:
 - Contact Email Address (must be NMLS user account email address)
- 1) After receipt of the necessary information, SRR will verify that the requestor is an NMLS Account Administrator for the requesting institution/company. Requests submitted by unauthorized company representatives will be rejected.
 - 2) SRR will clarify the information requested (if necessary) with the requestor to ensure that the data returned in the report meets the requestors requirements.

PAYMENT REQUIREMENTS

The requesting entity will be invoiced within NMLS for the ad hoc report, similar to the current invoicing process for filings, credit report requests, etc.). The report will be released to the requesting entity after the report is developed and validated.

REPORT VALIDATION AND DELIVERY

A validation of report contents by SRR will be performed prior to distribution of the report. SRR maintains strict security controls as to the NMLS data viewable by SRR personnel. Personal identifying information (PII) such as SSN or DOB, and sensitive data such as CBC results are not viewable to SRR support users. All sensitive information will be redacted by FINRA from the report prior to validation by SRR staff. Once SRR has validated the report contents, a notification will be sent to FINRA authorizing the release of the full report content to the authorized recipient.

REPORT DELIVERY METHOD

The delivery process has been modified so that SRR is excluded from receiving the report. The following delivery process will occur between FINRA's NMLS Reporting and data Fix team and the requesting institution/company:

- 1) The report will be encrypted by FINRA using 256 bit Advanced Encryption Standard (AES) via Winzip and distributed via Email directly to the designated recipient. SRR will not be included in the distribution.
- 2) FINRA will send the password to the recipient under separate cover.
- 3) The recipient will notify SRR that they are in receipt of the report, and the report contains the requested information.

NOTE: Files encrypted at 256 bit AES level may require a more advanced zip file utility than what you currently use.

ALTERNATE DELIVERY METHOD

For individuals that are unable to receive zipped email attachments, an alternate method of delivery will be used. Alternate delivery methods used by SRR are:

- Box: A secure file sharing service.
- Zix Secure Email: A secure email encryption service.

ADDENDUM 'A' - NMLS TERMS OF USE

NMLS INDUSTRY TERMS OF USE

The most current form of these terms will always be available at
<http://mortgage.nationwidelicensingsystem.org/about/Pages/Policies.aspx>

ADDENDUM 'B' – VIEW CHRI RESULTS AND CONTENT AGREEMENT

VIEW CHRI RESULTS AND CONTENT FOR FEDERAL INSTITUTIONS

FBI-MAINTAINED CRIMINAL HISTORY RECORD INFORMATION (CHRI) TERMS AND CONDITIONS

NOTICE: You have requested access to FBI-maintained Criminal History Record Information (CHRI), which includes information collected by criminal justice agencies on individuals consisting of identifiable descriptions and notations of arrests, indictments, informations, or other formal criminal charges (and any disposition arising there from) sentencing, correctional supervision, and release.

Under provisions set forth in 28 C.F.R. § 50.12, both governmental and nongovernmental entities authorized to submit fingerprints and receive FBI identification records must notify the individuals fingerprinted that the fingerprints will be used to check the criminal history records of the FBI. Identification records obtained from the FBI may be used solely for the purpose requested and may not be disseminated outside the receiving department or related agency. Only current CHRI may be used to deny a license or registration. If the information on the record is used to disqualify an applicant, the official making the determination of suitability for licensing or employment must provide the applicant the opportunity to complete, or challenge the accuracy of, the information contained in the FBI identification record. The deciding official should not deny the license or employment based on the information in the record until the applicant has been afforded a reasonable time to correct or complete the information, or has declined to do so. An individual should be presumed not guilty of any charge/arrest for which there is no final disposition stated on the record or otherwise determined. If the applicant wishes to correct the record as it appears in the FBI's Criminal Justice Information Services Division records system, the applicant should be advised that the procedures to change, correct or update the record are set forth in 28 CFR § 16.34.

Use of this information is governed by federal and state regulations and is subject to the following conditions:

- (1) only statutorily (federal and/or state) authorized recipients may view CHRI;
- (2) authorized recipients may view CHRI only for appropriate regulatory purposes;
- (3) authorized recipients may not deny a license or employment determination based on the information in the record until the subject has been afforded a reasonable time to correct or complete the information, or has declined to do so;
- (4) authorized recipients may not disseminate CHRI absent appropriate statutory authority, and
- (5) any person or entity violating federal or state regulations governing access to or use of CHRI may be subject to criminal and/or civil penalties.

Violation of federal or state regulations governing access to or use of CHRI may result in termination of an organization's NMLS access to CHRI.

By selecting "Accept" below and proceeding to view this individual's CHRI, I certify that I have read and understand all of the terms set forth above and that I am, or my employer is, an authorized recipient of CHRI pursuant to federal and, if applicable, state statutory authority and I am viewing this information for an appropriate regulatory purpose. I understand that I may use only current CHRI to deny a license or registration. I agree to abide by all of the terms and conditions stated above, agree to abide by the NMLS policies governing use of this information and acknowledge that unauthorized use or dissemination of CHRI may result in the imposition of criminal and/or civil penalties and/or the termination of my organization's NMLS access to CHRI.