

NMLS Ombudsman Meeting

February 15, 2024 Executive Summary

On February 15, 2024, the NMLS Ombudsman, Jim Payne, Director of Examinations and Assistant Deputy, Consumer and Mortgage Lending Division for the Kansas Office of the State Bank Commissioner, hosted the NMLS Ombudsman meeting at the 2024 Annual NMLS Conference & Training in San Antonion, Texas. 488 individuals attended the meeting.

<u>Click here</u> to view the full meeting video. <u>Click here</u> to access the full agenda, including submission exhibits.

The meeting focused on four topics submitted and presented by industry representatives.

- Amy Greenwood-Field (McGlinchey) discussed issues and recommendations related to NMLS Guidance, System Updates and Regulator Communication.
- Trish Lagodzinski and Jake Hines (Ankura) discussed Trust/Primary Bank Account and Financial Statements for Start-Up Companies.
- Kathy Tomasofsky (Money Services Business Association) discussed issues after state adoption of the Money Transmitter Model Act (MTMA).
- William Kooper, Liz Facemire, and Alisha Sears (Mortgage Bankers Association), and Bob Niemi (Weiner Brodsky Kider PC) presented issues related to the Mortgage Call Report (MCR), including State Specific Supplemental Form Adoption, MCR Q1 2024 Filings, and Data Privilege.

In addition to the industry submitted topics, the following topics were presented by CSBS staff.

- Brandon Milhorn provided updates as CSBS's new President and CEO.
- Tony Vasile and Humaira Mubeen provided updates on Exam Standards and SES.
- Dave Dwyer provided updates on the NMLS Program.

Mr. Payne invited the following regulatory and industry experts to participate in the discussion of the topics:

- Kirsten Anderson (Oregon Division of Financial Regulation)
- Cindy Begin (Massachusetts Division of Banks)
- Corey Burrows (Massachusetts Division of Banks)
- Rod Carnes (Georgia Department of Banking and Finance)



- Craig Christiansen (Iowa Division of Banking)
- Charlie Clark Washington Department of Financial Institutions)
- Scott Corscadden (Alabama State Banking Department)
- Rich Cortes (Connecticut Department of Banking)
- Bo Fears (Georgia Department of Banking and Finance)
- Jeff Peterson (Nebraska Department of Banking and Finance)
- William Purce (Texas Department of Savings & Mortgage Lending)
- Rick St. Onge (Washington Department of Financial Institutions)
- Karyn Tierney (Arkansas Securities Department)
- Erin Van Engelen (Idaho Department of Finance Corscadden)

Stephanie Buonomo, Mike Casagrande, and Margaret Liu from CSBS also participated in the meeting.

CSBS Staff and the NMLS Ombudsman identified the following as action items from the meeting.

- CSBS will evaluate ways the NMLS Company Account Process can be improved.
- CSBS will review Financial Statement submission process suggestions submitted.
- CSBS will follow-up and work with state agencies to ensure financial statement system settings match requirements identified on state licensing checklists.
- Related to a formal industry/regulator MTMA implementation working group, regulators request that industry submit any specific issues they are seeing in writing to the bi-weekly MTMA Office Hours so that the regulators can review/discuss.
- If states wish to communicate a grace period, please reach out to me at ombudsman@nmls.org and we can make sure its communicated via the NMLS Resource Center.
- Related to MCR Data Privilege, CSBS will continue to monitor this issue closely and will review the MCR Frequently Asked Questions to determine if updates are necessary.