



# Employment Reporting Enhancement

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## Overview

### What is changing with employment reporting?

Beginning April 18, there are a series of changes affecting employment reporting in NMLS:

- Company Relationship information populates the Employment History section of all individual forms (MU4, MU2 and MU4R). As Company Relationships are primarily created for state-licensed Mortgage Loan Originators (MLOs), this enhancement will mainly affect the MU4 Form.
- Individuals can enter an “Employment Gap” to fill periods of the 10-year employment history requirement.
- The Company Relationship will contain three new data points managed by the company:
  1. Individual’s Position/Title
  2. Individual’s Work Phone
  3. Individual’s Work Email

This means, for sponsored individuals, the current employment details, specifically the name of the employer and address, on the MU4 will always match the sponsored company. Changes to the company’s name and addresses will stay in sync with the MU4.

This change is not retroactive. Relationships that ended before April 18 will not appear on the MU4, MU2, or MU4R.

### What do I need to do after April 18 to stay compliant?

Individuals with an active Company Relationship:

1. Review the Employment History section of your MU4.
  - Any active Company Relationships will display in the MU4 after April 18. Individuals should delete the duplicate self-entered employment entry that has been replaced by your Company Relationship information.
  - Confirm the company-entered information is accurate, including your Position/Title, Work Phone, and Work Email.
    - If any information is incorrect, contact your company to request updates. You will not be able to edit company-entered information yourself.



- If you have multiple employers, confirm each employer relationship correctly reflects your current employment status.
  - Company users can also remove the duplicate employment entry and request that MLOs attest to the filing and submit the MU4 on their behalf.
2. Attest to the information and submit your MU4.

#### Company users:

1. Complete the three additional data points for each individual with whom the company has an active relationship:
  - Position/Title
  - Individual's Work Phone
  - Individual's Work Email

#### When do these changes need to be completed by?

Company administrators and individuals must complete these changes no later than August 31. Failure to complete these updates may delay filings or create compliance issues during 2027 renewal.

#### Why is NMLS making this change?

NMLS is aligning employment history with Company Relationships, so employment information is captured once and reused, rather than being re-entered and maintained separately by individuals and companies.

This change addresses long-standing pain points such as duplicate data entry, conflicting employment records, and confusion over who is responsible for updating employment information.



## Best Practice for Managing Employment History

### Mortgage Loan Originators, Branch Managers, and/or others requiring an MU4 Form:

The best practice is to follow this process so that employment information flows automatically into the MU4:

1. The company requests access to the MLO's record in NMLS.
2. The MLO accepts the request.
3. The company creates and completes a Company Relationship
4. The company or the MLO completes the MU4 Form. *Beginning April 18, 2026, the MU4 automatically populates with the current employment information because the employment details were entered when the relationship was created.*
5. The MU4 is submitted and attested to, confirming the accuracy of the employment information, as well as all other information on the MU4 form.

### Direct and Indirect Owners, Qualified Individuals, and others requiring an MU2 Form:

The best practice for MU2 filings is to follow this process, which does not require a relationship to be created:

1. The company requests access to the MU2 Individual's record in NMLS.
2. The MU2 Individual accepts the request.
3. The company completes the MU2 filing for the individual. There are no relationship details from the company in the employment history section.<sup>12</sup>
4. The MU2 is submitted and attested to

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<sup>1</sup> It is not recommended to create a Company Relationship for individuals who are not seeking license sponsorship through an MU4 filing.

<sup>2</sup> If the company employs the individual, this should be reported on the MU2 using "self-entered" employment entry.



## Frequently Asked Questions

### General

What are the different statuses for each employment entry, and what do they mean?

The Employment table shows the status of each employment entry to indicate who provided the information and whether it has been confirmed.

Status type:

- **Self-reported:** The individual entered the employment information, and it is not associated with an NMLS Company Relationship.
- **Federal Employment:** The employment reflects federal employment as reported on the MU4R Form in the NMLS Federal Registry. The employment information is managed through the MU4R Form (federal) and cannot be edited on the MU4 Form (state).
- **Pending Form Submission:** The Company Relationship employment has been created, but the associated MU4 Form has not yet been submitted. The employment information cannot be changed by the individual. Changes must be made by the Company when altering the Company Relationship.
- **Verified:** The employment information is supported by an active Company Relationship and has been attested to by the individual. The employment information cannot be changed by the individual. Changes must be made by altering the Company Relationship.

How should existing employment history be handled after the update?

This change is not retroactive. Relationships that ended before April 18 will not appear on the MU4, MU2, or MU4R. Licensees can change previous self-reported unemployment periods using the new Employment Gap feature, but there is no requirement to do so.

What should happen for MU2 individuals who have an existing Company Relationship?

If a Company Relationship was created for an MU2 individual who is not an employee, the relationship will still display as an employment record on the MU2 Employment History. A company may use the Position/Title field in the relationship to clarify that this individual is not an employee.



▲ NOTE: In this situation, do not end the relationship, as ending the relationship will also end the MU2 association with the company.

When an ACN address change occurs, will it create a new address record or overwrite the existing address?

If something changes on the company's MU1 or MU3, such as a company name or address change, it may affect the employment record. When this happens, the update will automatically flow to the MU4 and update the current employment record. The MLO will receive a License Item prompting them to review and resubmit their filing so the update is recorded in the filing history. No additional updates are required from the MLO beyond reviewing the information and resubmitting the filing.

If an MLO changes their title, should the relationship be ended and a new one created, or should the change overwrite the existing employment record?

A relationship is intended to cover the entire period of employment for an individual. Updates to the Position/Title field should be made to the relationship record which overwrites the existing employment history record.

Where will MLO contact information be managed going forward?

The Company Relationship will contain three new data points managed by the company:

- Individual's Position/Title
- Individual's Work Phone
- Individual's Work Email

These fields allow regulators to reach the MLO as soon as the relationship is created, without needing to wait for the MU4 to be revised.

The two fields on the MU4 Form, Business Phone and Work Email Address should be updated with the most current information to reach the individual. These fields are managed as part of the MU4 Form and do not share data with the Company Relationship.

### Attestation Requirements

What are the attestation requirements for updating Employment History?

An MLO must attest to their MU4 form after the Company Relationship is linked to the MU4 and before the employment record appears on NMLS Consumer Access. This attestation



creates the initial “handshake” between the company and the MLO, confirming that both parties recognize the employment relationship.

Once this handshake occurs, Consumer Access will stay in sync with the attested relationship details.

Each time an MLO attests to their record, the attestation is logged in the individual’s filing history, which is accessible to regulators.

If something changes on the company’s MU1 or MU3, such as a company name or address change, it may affect the employment record. When this happens, the update will automatically flow to the MU4 and update the current employment record. In these cases, the MLO will receive a License Item prompting them to review and resubmit their filing so the update is recorded in the filing history.

What happens if employment information entered by the company is incorrect?

Individuals can review the information during the attestation process and work with the company to correct it before submission. The company is responsible for making the correction to the relationship, and the individual will need to review and submit following the updates.

If an MU1 or MU3 address changes and the individual has no other updates, does the company need to submit an MU4 filing solely to trigger verification of the individual’s employment information?

Yes. If something changes on the company’s MU1 or MU3, such as a company name or address change, the update will automatically flow to the MU4 and update the current employment record. The MLO will receive a License Item prompting them to review and resubmit their filing so the update is recorded in the filing history. No additional updates are required from the MLO beyond reviewing the information and resubmitting the filing.

## Work Locations

How do Employment History records apply to loan originators working remotely?

In the case of an individual that is fully remote, a supervised location is still required by the company when creating the relationship. The supervised location is an assigned location noted in the Company Relationship section from which the individual is supervised. This will display on the employment record as the individual’s employment address on the MU4 Form and Consumer Access.



How should employment be recorded when the individual works in a state that does not require branch licensing and the registered location is not the corporate office?

During the creation of a Company Relationship with an MLO, the company must designate one or more company or branch locations (i.e., the MLO's physical work location(s)) for the MLO. If the individual works in a state that does not require branch licensing, and the location has not already been reported for another state's activity, the company should select the corporate office for the registered location. In the next phase of NMLS Modernization, users will be able to select a registered location that is not a branch location or corporate office.

How should employment history be handled for states that require listing every location an individual has worked at, even if it is the same company or a relocated branch?

Self-reported employment entries may be used to fulfil a state request on the MU4 Form.