



Amendments and Additions to the Mortgage Call Report Form Version 7

Response to Public Comment

December 17, 2024 – March 6, 2025





Table of Contents

Response to Public Comment Period on Proposed Amendments and Additions to the Mortgage Call Report Form Version 7	3
Public Response Demographics	3
Summary of Public Comments & Responses	3
Exhibit One: Proposal: Mortgage Call Report Form Version 7 Public Comment	6
Exhibit Two: NMLS MCR Subcommittee	15



Response to Public Comment Period on Proposed Amendments and Additions to the Mortgage Call Report Form Version 7

December 17, 2024 - March 6, 2025

Between December 17, 2024, and March 6, 2025, on behalf of the NMLS Policy Committee¹, the Conference of State Bank Supervisors² invited public comments on proposed amendments and additions to the Mortgage Call Report (MCR) Form Version 7 (FV7). [Click here](#) to access the proposal.

Public Response Demographics

One industry association responded with feedback.³ See page 16 to view the comment in its entirety.

Summary of Public Comments & Responses

Below are the summarized comments of the respondent followed by CSBS's Responses

Comment #1: Regulators Should Clarify their Intent is to Align the MCR with the MBFRF

CSBS Response:

While the proposed changes to the MCR FV7 may create a greater alignment with the MBFRF the goal of the updates is to receive data for state regulator supervisory purposes. If there is an opportunity to create alignment with other industry reporting requirements, state regulators will pursue alignment where possible. Where alignment occurs with these changes the impact on servicers is minimal as the data reported on those sections of the documents are the same. CSBS will also work to ensure that where appropriate definitions applicable to both documents are the same. These changes to the MCR align with the prudential standards requirements which means regulators do not need to request the MBFRF which is a substantially longer form than the MCR.

Comment #2: State Regulatory Authority to Collect New Data Fields Should be Fully Established Before Data Collection Begins

CSBS Response:

¹ Information about the NMLS Policy Committee can be found [here](#).

² Information about CSBS can be found [here](#).

³ During the Regulator Comment Period, no substantive comments were made on the Proposal. However, several agencies provided suggestions for updates to be considered for FV8.



Currently eight states have adopted the Prudential Standards. Three new states have publicly announced legislation, and additional states are moving to make changes to their statutes to require this data. As part of the model law implementation process, state regulators and CSBS deem it necessary to include this data field now as it can currently be used by multiple agencies and that number will increase as the Prudential Standards are adopted.

The MCR Subcommittee will consider an exemption for the completion of these data fields for servicers that do not meet the 2,000 nationwide loan threshold for coverage under state prudential standards requirements.

Comment #3: Regulators Should Remove Reporting of Subservicing Delinquencies

CSBS Response:

Data on subservicing delinquencies is necessary as it provides agencies a breakdown of how a company is performing in a given state and provides regulators the opportunity to ensure that consumers are protected in their interactions with these institutions. Furthermore, elevated delinquency levels may require more frequent servicer interaction with consumers and may lead to a reduction in servicing capacity, all of which is relevant information for state supervisory purposes. Data on subservicing delinquencies is also required as it is used by regulators during servicing examinations.

Comment #4: A New MCR Data Field Request for Mortgage Forbearance Assistance is Problematic and Should be Removed

CSBS Response:

While forbearance reporting was temporary for the MBFRF and the Covid-19 pandemic has passed, disaster-related forbearance is a perennial occurrence that will continue to affect mortgage forbearance. Therefore, to be better prepared in the event of a future downturn in the mortgage market, state regulators and CSBS deem it necessary to incorporate the new mortgage forbearance data field now which will reduce future hardship on servicers by preventing the need for an additional change to the MCR when the next event occurs. The forbearance field will be automatically populated with a "0" for servicers that do not hold any loans in forbearance. CSBS will work with affected stakeholders to ensure that risks that the regulators want to track and key terms in relation to the mortgage forbearance field are aptly defined.



Comment #5: Regulators Should Provide the XML File when Announcing the Final MCRV7 and Provide an Adequate Implementation Timeline

CSBS Response:

CSBS recognizes that industry may need to make changes to their systems to comply with the proposed changes. Industry should expect to receive the final sample MCR and definitions documents by August 2025 and an XML file at least six months prior to the due date of the information, May 15, 2026. CSBS appreciates the need for predictability and information in advance of any requirements and intends to develop a regular call report release schedule.⁴ This change should ensure that industry has enough time to prepare their systems for call report changes in the future.

Comment #6: Regulators Must Assure the Confidentiality of MBA Member Company Information Submitted to the NMLS

CSBS Response: Information submitted to a state or federal agency is under that agency's control. Where Data is submitted or released to more than one state agency or federal agency, then such Data is under the control of each such agency. Data submitted to an agency is subject to the public information, and privacy laws of such agency.

⁴ Please note, that emergency issues may require a change to the release schedule. If this occurs, CSBS will make every effort to get information out to affected industry as soon as possible.



Exhibit One: Proposal: Mortgage Call Report Form Version 7 Public Comment

Previously approved new servicing line items

As part of the recurring monthly mortgage servicer inquiry, CSBS staff proposed a set of new questions focusing on COVID-related forbearance. These questions were originally proposed and approved for MCR Form Version 6 but were not included in the final deployment of MCR FV6.

Minor definition fixes and line-item adjustments

With the implementation of MCR FV6, a few minor issues with definitions and line-item logic were noted. Specifics are detailed in the second portion of this document.

New servicing line items

- 1) **New data fields for Loans Serviced – Nationwide Totals series – loan counts by investor/counterparty:**
 - a. Amount and count of loans serviced for Fannie Mae, Freddie Mac, Ginnie Mae, Private-label Securities and Other.

Servicing Activity	UPB (\$)	Loan Count (#)	Avg. Loan Size (\$)
FNMA			
FHLMC			
GNMA			
Private Label			
Other			
Total Servicing Activity			

Above totals must match the sum of LS20, LS30 and LS40.



Rationale: Performance, borrower credit profile and advancing obligations differ significantly among investor/counterparties and this will assist regulators in the tracking of differing exposures.

2) **New Data fields for Loans Serviced – Nationwide Totals series**

- a. Nationwide Payment Status of Loans serviced by servicing role (Wholly Owned Loans, Loans Serviced Under MSR's, Subservicing for Others, Subservicing by Others).

Wholly Owned Loans	UPB (\$)	Loan Count (#)	Average Loan Size (\$)
Current Loans			
30-59 Days Delinquent			
60-89 Days Delinquent			
90 Days or More Delinquent			
Total			

Loans Serviced Under MSR's	UPB (\$)	Loan Count (#)	Average Loan Size (\$)
Current Loans			
30-59 Days Delinquent			
60-89 Days Delinquent			
90 Days or More Delinquent			
Total			



Subservicing for Others	UPB (\$)	Loan Count (#)	Average Loan Size (\$)
Current Loans			
30-59 Days Delinquent			
60-89 Days Delinquent			
90 Days or More Delinquent			
Total			

Subservicing by Others	UPB (\$)	Loan Count (#)	Average Loan Size (\$)
Current Loans			
30-59 Days Delinquent			
60-89 Days Delinquent			
90 Days or More Delinquent			
Total			

Rationale: Segmenting the portfolios by investor type and servicing role will allow us to more accurately track the factors that most significantly affects the financial liquidity and net worth requirements for mortgage servicers, which we presently do not have the ability to do within RMLA3 as all servicing volume is lumped together regardless of investor type or servicing role.

- 3) **New data fields for Loans Serviced – Nationwide Totals Series (Nationwide Servicing Performance). Count and Amount of Foreclosed Loans**



Foreclosed Loans	UPB (\$)	Loan Count (#)	Avg. Loan Size (\$)
FNMA			
FHLMC			
GNMA			
Private Label			
Other			
Total Foreclosed Loans			

Foreclosed Loans	UPB (\$)	Loan Count (#)	Avg. Loan Size (\$)
Wholly Owned			
Serviced Under MSR's			
Subservicing for Others			
Subservicing by Others			
Other			
Total Foreclosed Loans			



- 4) New data fields for Loans Serviced – Nationwide Totals series (Nationwide Servicing Portfolio Performance) – forbearance and foreclosure volume:

Disaster Forbearance

	UPB (\$)	Loan Count (#)	Avg. Loan Size (\$)
Loans in Forbearance at beginning of period			
Loans Entering Forbearance during period			
Loans Exiting Forbearance during period and Resumed Contractual Payment			
Loans Exiting Forbearance during period and entering Loss Mitigation			
Loans Exiting Forbearance during period and entering Foreclosure			
Total Loans in Forbearance at end of Period			

- 5) New data fields for RMLA Section III (State level reporting) –

	UPB (\$)	Loan Count (#)	Avg. Loan Size (\$)
Loans in Forbearance at beginning of period			
Loans Entering Forbearance during period			
Loans Exiting Forbearance during period and Resumed Contractual Payment			



Loans Exiting Forbearance during period and entering Loss Mitigation			
Loans Exiting Forbearance during period and entering Foreclosure			
Total Loans in Forbearance at end of Period			

Rationale for #3, #4, and #5: We do not currently collect any forbearance data, and this will give us ongoing visibility into this type of borrower assistance program that has been so critical during the COVID-19 pandemic and will be relevant for disaster-related assistance post-pandemic.

- 6) **New data fields for Loans Serviced – Nationwide Totals series (Nationwide Servicing Portfolio Performance) – Remittance Type**
- a. Amount and count of servicing by investor type that is actual/actual remittance type
 - b. Amount and count of servicing by investor type that is scheduled/scheduled remittance type
 - c. Amount and count of servicing by investor type that is scheduled/actual remittance type

FNMA	UPB	Loan Count	Average Loan Size
	(\$)	(\$)	(\$)
Actual/Actual			
Scheduled/Scheduled			
Scheduled/Actual			



FHLMC	UPB (\$)	Loan Count (\$)	Average Loan Size (\$)
Actual/Actual			
Scheduled/Scheduled			
Scheduled/Actual			

GNMA	UPB (\$)	Loan Count (\$)	Average Loan Size (\$)
Actual/Actual			
Scheduled/Scheduled			
Scheduled/Actual			

PRIVATE	UPB (\$)	Loan Count (\$)	Average Loan Size (\$)
Actual/Actual			
Scheduled/Scheduled			
Scheduled/Actual			

OTHER	UPB (\$)	Loan Count (\$)	Average Loan Size (\$)
Actual/Actual			
Scheduled/Scheduled			
Scheduled/Actual			



Rationale: This identifies what portion of a servicer's portfolio requires advancing to bondholders and at what level (principal and interest or interest only) and speaks to the liquidity needed for such advancing. This is not currently collected in the quarterly MCR data.

7) **New Memo Data Field – Financial Condition reporting:**

- a. Add a field collecting End of quarter Loan Prepayment Custodial Float Balance by investor/counterparty type (Fannie Mae, Freddie Mac, Ginnie Mae, Private-label).

MEMO DATA

Custodial Float Balance	(\$)
FNMA	
FHLMC	
GNMA	
Private Label	
Other	
Total Servicing Activity	

Rationale: This source of cash is not reported on financial statements or disclosed in the MCR but is a significant source of short-term liquidity available for use by servicers to fund principal and interest advances to bondholders by Ginnie Mae and the GSEs.

Definition and line-item fixes

1. Clarification of refi purpose definitions (I310 series)

Line Item	Definition
I310 – Purchase	
I311 – Refinance Rate-Term	



I312 – Refinance Cash-Out Refinances	
I313 – Refinance Restructure	
I314 – Refinance Other/Unknown	

2. Removal of HAMP loans from definitions
 - a. HAMP loans are no longer offered
3. Remove AC710
 - a. HECM-Saver is no longer offered
4. Minor text edits and definition updates (C370, QM definition)
 - a. C370
The initial basis of securities and other interests (such as residuals) created be included here because they are reported separately. upon securitization and retained by the transferor. This is based on a relative fair value allocation under FAS 140 or fair values if the fair value option was elected under FAS 159. Mortgage servicing rights should not be included.
 - b. QM definition
A Qualified Mortgage is one that meets the Regulation Z (12 CFR 1026) requirements.
5. S100 and S200 series “Net Changes in Loan Modification Amount” field
 - a. Add a new field to both the S100 and S200 series to capture changes in loan amount during a loan modification.



Exhibit Two: NMLS MCR Subcommittee

Representative	Agency
Jeff Peterson	Nebraska Department of Banking and Finance
April Becker	North Carolina Office of the Commissioner of Banks
Len Hicks	Texas Department of Savings and Mortgage Lending
Yvonne Shafer-Shaw	Wyoming Division of Banking
Joseph Szczepaniak	Montana Division of Banking and Financial Institutions
Alexandra Wessel	Wisconsin Department of Financial Institutions



Public Comments Received on Amendments and Additions to
the Mortgage Call Report Form Version 7
December 17, 2024 – March 6, 2025

On December 17, 2024, on behalf of the NMLS Policy Committee, the Conference of State Bank Supervisors (CSBS) invited public comments on the Amendments and Additions to the Mortgage Call Report Form Version 7. CSBS received one response to its Request for Comment. The response will be reviewed and analyzed. Once the review is completed, a detailed response including disposition of the comments will be posted.

[Click here](#) to view the proposal.

Updated Date: March 2025 / 16



March 6, 2025

Brandon Millhorn
President and CEO
Conference of State Bank Supervisors
1300 I Street NW, Suite 700 East
Washington, DC 20005
comments@csbs.org

Re: Amendments and Additions to the Mortgage Call Report Form Version 7

Dear Mr. Millhorn,

The Mortgage Bankers Association (MBA)¹ appreciates the opportunity to comment on proposed changes to the Nationwide Multistate Licensing System (NMLS) Mortgage Call Report Form Version 7 (MCRV7).² Thank you also for the preview of these changes made during the August 2024 NMLS Ombudsman meeting by Jeff Peterson from the Nebraska Department of Banking and Finance and Jessan Groenendyk from CSBS.

During the last year, the industry completed herculean efforts to implement MCR Form Version 6 (MCRV6) on a very short timeline. Thus, when it was announced during the August 2024 NMLS Ombudsman meeting that MCRV7 would reflect either minor changes to the MCR and/or changes that would bring the MCR into greater alignment with the Mortgage Bankers Financial Reporting Form (MBFRF), it was well received. MBA has long advocated in NMLS forums for this alignment to reduce duplicative, time consuming and ultimately costly additional reporting to regulators. It is important that proposed changes actually reflect true alignment. Also, since many MBA member companies do not file an MBFRF – including many smaller firms – it is critical that a longer implementation timeline be permitted to facilitate compliance by smaller firms with fewer resources.

MBA would like to highlight the following points regarding the proposal:

- Regulators Should Clarify that their Intent is to Align the MCR with the MBFRF;

¹ The Mortgage Bankers Association (MBA) is the national association representing the real estate finance industry, an industry that employs more than 275,000 people in virtually every community in the country. Headquartered in Washington, D.C., the association works to ensure the continued strength of the nation's residential and commercial real estate markets, to expand homeownership, and to extend access to affordable housing to all Americans. MBA promotes fair and ethical lending practices and fosters professional excellence among real estate finance employees through a wide range of educational programs and a variety of publications. Its membership of more than 2,000 companies includes all elements of real estate finance: independent mortgage banks, mortgage brokers, commercial banks, thrifts, REITs, Wall Street conduits, life insurance companies, credit unions, and others in the mortgage lending field. For additional information, visit MBA's website: www.mba.org.

²

<https://mortgage.nationwidelicensingsystem.org/news/ProposalsForComment/MCR%20FV7%20Public%20Comment%20Final%2012172024.pdf>

- State Regulatory Authority to Collect New Data Fields Should be Fully Established Before Data Collection Begins;
- Regulators Should Remove Reporting of Subservicing Delinquencies;
- A New MCR Data Field Request for Mortgage Forbearance Assistance is Problematic and Should be Removed;
- Regulators Should Provide the XML File when Announcing the Final MCRV7 and Provide an Adequate Implementation Timeline; and,
- Regulators Must Assure the Confidentiality of MBA Member Company Information Submitted to the NMLS.

Regulators Should Clarify that their Intent is to Align the MCR with the MBFRF

MBA members are confused regarding the intent and purpose of some of the new data fields added to the MCRV7. The background in the December 18, 2024 proposal only states the changes are to aid state regulators in “...gain[ing] insights into industry trends, helping them identify potential issues that could harm consumers.” However, months earlier during the August 2024 NMLS Ombudsman meeting, staff presented the changes as part of an alignment with the MBFRF. Most recently, in the course of presentations during the recent NMLS conference, staff and regulators explained that the new data fields were necessary to facilitate examination by the handful of regulators whose states had adopted the Conference of State Bank Supervisors (CSBS) model Prudential Standards. Given this confusion and the fact that this proposal is coming so soon after the exhaustive efforts to implement MCRV6, MBA suggests that MCRV7 changes be limited to MBFRF alignment purposes only. Any additional changes beyond alignment should be part of a separate “rulemaking” and include a separate cost-benefit assessment.

State Regulatory Authority to Collect New Data Fields Should be Fully Established Before Data Collection Begins

MBA believes that clear regulatory authority should first be established in state law to require any new data beyond that which is required for MBFRF alignment. As of this writing, MBA is aware of only seven states that have enacted the model CSBS Prudential Standards. Importantly, if the MCRV7 proposal is based on the states enacting the model Prudential Standards, the proposal does not explain who is still required to file these data points considering the model Prudential Standards exempts servicers of fewer than 2,000 loans.³

Regulators Should Remove Reporting of Subservicing Delinquencies

MBA has concerns about the reporting format for delinquencies and needs to understand the rationale for separate delinquency reporting on loans subserviced for and by others.

³ *The Final Model Standards contain a de minimis cutoff or coverage trigger that applies to servicers with portfolios of 2,000 or more 1 – 4-unit residential mortgage loans serviced or subserviced for others, excluding whole loans owned and loans being “interim” serviced prior to sale, and operating in two or more states, as of the most recent calendar year end, reported in the NMLS Mortgage Call Report.*
<https://www.csbs.org/sites/default/files/2021-08/Final%20Model%20Prudential%20Standards%20-%20July%2023%2C%202021%20Board%20Approved%20Aug.pdf>

For monitoring of liquidity stress, regulators should focus on the loan performance of MSRs *owned by the servicer* – regardless of whether the servicing is done in-house or by a subservicer. MSR owners retain the obligation to make advances on delinquent PITI. Subservicers do not have a similar obligation to advance. For that reason, we understand the need to have servicers report on total UPB and number of loans serviced, and what portion of that total includes loans subserviced FOR others and loans subserviced BY others.

However, the reporting of delinquencies on loans subserviced BY and FOR others does not make sense. For loans subserviced BY others, the delinquencies will already be reported in the section the MCR calls “Loans Serviced Under MSRs.” For loans subserviced FOR others, the advancing obligation resides with the owner of the MSRs, not the subservicer. Collecting delinquency data on loans subserviced FOR others does not enhance the regulators’ understanding of liquidity stress from that portfolio.

Given the stated purpose of this expansion of the MCR is prudential oversight, we do not believe that separate reporting of subservicing delinquencies FOR others adds any value, while the delinquency reporting on subservicing BY others is duplicative. Both of these sections should be removed.

A New MCR Data Field Request for Mortgage Forbearance Assistance is Problematic and Should be Removed

MBA believes that the proposed section is problematic and should not be included in MCRV7 as forbearance data does not provide additional or better insight into liquidity stress than delinquency data. The two are different, and forbearance reporting on the MBFRF was a temporary consideration during the COVID-19 to calculate how to provide IMBs relief from agency liquidity standards due to the CARES Act forbearance mandates. This is why the MBFRF form has not tracked all forbearances; only those related to COVID-19 pandemic. Again, this forbearance tracking was added in 2020 in the early days of the pandemic to the MBFRF because the agencies temporarily provided capital/liquidity relief to servicers with COVID forbearances.⁴ During the last year, the Consortium leadership has decided to remove COVID-19 related forbearances as that relief no longer applies. In fact, according to MBA’s Loan Monitoring Survey loans in forbearance are less than half of one percent of all loan portfolios. As of January 31, 2025, MBA estimates that only 200,000 homeowners are in forbearance plans.⁵

Again, MBA believes delinquency data better enhances financial analysis of the servicer/issuer. In a post COVID-19 era, we would welcome further discussion with regulators to determine the need for this data, especially if it centers on post natural disaster assistance efforts. Significant work will be needed to identify what risks the regulators desire to track and to ensure proper definitions of key terms.

⁴ <https://singlefamily.fanniemae.com/media/22261/display>, *Modifying seller/servicer financial liquidity requirements for mortgage loans in Forbearance*. page 4

⁵ <https://www.mba.org/news-and-research/newsroom/news/2025/02/18/share-of-mortgage-loans-in-forbearance-decreases-to-0.40--in-january>

It is also worth adding that in its review MBA could not discover any state that mandates by statute the submission of forbearance data via the MCR or through a report outside the NMLS. Consequently, MBA does not support adding these fields to the MCR.

Regulators Should Provide the XML File when Announcing the Final MCRV7 and Provide an Adequate Implementation Timeline

The MCRV7 proposal did not include a timeline for implementation. However, the plan to commence data collection in January 2026 was noted during presentations at the recent NMLS Conference. Given that the implementation of MCRV6 was on a very condensed timeline, MBA would like to make sure state regulators consider an appropriate timeline with this new proposal. Given that implementation requires the XML file, MBA also urges regulators to provide the file when announcing the final MCRV7. MBA members have expressed the need for 9 months for this implementation following the XML file's release to enable vendors to build out their software programs to assist filers.

Regulators Must Assure the Confidentiality of MBA Member Company Information Submitted to the NMLS

Should NMLS proceed with the MCRV7 as proposed, and all servicers and subservicers are required to file these new data points, MBA wishes to once more voice its significant concerns about the privacy of member company information in these reports. Indeed, during the recent Ombudsman meeting in February, MBA members again raised the topic of confidentiality of their data when submitted to NMLS and again did not receive a firm response on what to expect. The MCRV7 proposal requests national figures for individual state regulators. Does that change the governing mandate for protecting confidentiality from a least protective state standard to one governed by federal law? Or, as a result of a public records request could a state regulator still inappropriately disclose confidential supervisory information outside the scope of their state-specific reporting mandates? MBA member companies deserve to know that their data is being safeguarded, and if not, what regulators are doing to attend to any potential breach of privilege.

Again, thank you for the opportunity to comment on the proposed changes to the MCR. If you have any questions, or need more information, please feel free to contact me at pmills@mba.org.

Respectfully,



Pete Mills
Senior Vice President
Residential Policy and Strategic Industry Engagement