



Disclosure Question FAQs

1. What can I find here on the Resource Center?

- a. FAQs to help explain what, why, and the when of the revised questions
- b. Guidance documents to aid industry in their review and completion of the revised questions

2. Why did we revise the questions?

- a. The questions have not been reviewed since the inception of NMLS.
- b. To clear up potential confusion in the questions.
- c. To clarify some of the questions and terms used and to add some newly defined terms.

3. What are critical things to know about the revised individual disclosure questions?

- a. The revised questions are retroactive.
- b. The Regulatory questions are broken into two sections.
- c. A consumer protection authority and governmental entity have been added to the list of regulatory bodies inquired about in some of the questions.
- d. The misdemeanor inquiry has been limited to ten years.
- e. The order of the questions has changed, so personal questions are followed by those that pertain to control activities.
- f. For some questions an individual will be able to answer not applicable.

4. When will the revised individual questions be deployed into the System?

The revised individual questions will be deployed Spring 2026.

5. Who must complete the revised questions?

All MU2 (e.g., control persons, branch managers and qualifying individuals) and MU4 (MLO) individuals. Since the MU2 is attached to MU1/MU3s, companies will have to initiate this update on behalf of all their MU2s and resubmit their MU1/MU3s.

6. Will industry be given a deadline to complete the revised questions?

Industry is strongly encouraged to complete the questions by August 31, 2026, so any changes can be reviewed by agencies well in advance of renewal season.

7. Will a company be able to submit an MU1 or MU3 without their MU2 individuals having completed and attesting to the revised disclosure questions?

No. All MU2 individuals must complete the new questions and attest to them before a company can submit an MU1 or MU3 filing.

8. When will the company disclosure questions be revised?

The company disclosure questions will be revised as part of Phase 4 of the NMLS Modernization roadmap (2027).



9. Will any changes made to implement the revised Individual questions affect the current company questions?

While the revised company disclosure questions will be deployed later, it is important to note that changes made to the Glossary (i.e., amended terms or new terms) at the time of implementation of the revised Individual Disclosure Questions will affect those Company Disclosure Questions that use the amended or new terms.

There is a guidance document which identifies those terms in the current company questions that are newly defined or have amended definitions.

10. What does it mean that the questions are retroactive?

A new definition or new criteria is applied to the question that did not exist originally. An example is the definition of “found” has been amended to include agreements that are public. In case a public agreement exists that applies to a question, then the answer to the question needs to be changed.

11. The revised questions are retroactive, so now what?

Individuals will have to answer the questions as if they are doing so for the first time. Individuals will be able to see and use existing disclosure explanations in their MU2/MU4 for the new questions. Existing explanations can be amended or deleted, if necessary. If amended or deleted, a reason must be provided for the amendment or deletion.

It is important to note the questions related to pending actions may be impacted by definitional changes (e.g., the definition of financial services). These questions should be reviewed and amended, if necessary.

12. Is there anything I can do to speed up the review of my questions and answers once I have completed them?

It is recommended that if you change an existing explanation or if an answer went from no to yes, you state in the beginning of the document why the change was made. An example would be if you had previously answered a civil judicial disclosure question no but now answered yes because there was a public agreement. (see Question 10 herein).

13. Why were the Regulatory Action questions broken into two sections?

Part I will be applicable to all individuals and are those questions that provide a laundry list of findings and actions in connection with various regulatory bodies to which an individual must state whether they have been subject to.

Questions pertaining to the company’s or the individual’s authorization to act as a contractor, accountant or attorney have been isolated in their own section labeled Regulatory Action Disclosure Questions Part II.

It is important to note that financial services licenses and other professional licenses have been added to the license inquiry.



14. Will I be able to provide an explanation for a no answer?

Yes. Explanations to no responses may be provided at the disclosure category level; the ability to upload a no explanation at the category level will be at the end of the disclosure questions. Prior to the release, if a no explanation was provided, it must be reassigned with the category, rather than tied to the question.

15. Why was the ability to answer a question not applicable added?

Currently, you can only answer yes or no to questions, which may be misleading. For example, currently, one question asks, "Have you ever had an authorization to act as an attorney, accountant, or State or federal contractor that was revoked or suspended?"

If you answer no to this question today, it is not conclusive as to whether you are or were ever authorized to act as an attorney, accountant, or State or federal contractor.

By allowing a not applicable answer to this question and others like it, most notably questions pertaining to control persons, it will become more clear whether individuals even had these types of authorizations.

For example, under the revised questions, a "yes" answer is explanatory; a "no" answer will indicate that an individual had these authorizations but never had any action taken against them; "Not Applicable" will denote they never had any of these authorizations to begin with.

16. Will I be able to answer not applicable to all the questions?

No. Only the Regulatory Action – Part II questions (questions 20 and 21) and the control questions (questions 23- 30) will provide an individual with the ability to answer not applicable. To facilitate the use of not applicable, guidance questions have been added before these two sections.

If you answer no to the guidance questions for these sections, the questions will be marked by the system as not applicable.

17. Will I be able to see my previous answers?

Yes. When updating the new disclosure questions, there will be a link that will open the old disclosure question answers and explanations. This will also be viewable in the historical filings of composite view.

18. Will I be able to see if existing explanations were deleted or amended?

Yes. If an explanation is deleted or amended, the system will require a reason from the user.

19. How will I know when the revised questions are in the System?

NMLS will place a license item on every MU4 individual to notify them of the requirement to update their disclosure questions. Once the form has been updated, the license item will automatically clear.



NMLS is exploring the ability to place license items on the MU1 and MU3 that will clear once an MU2 individual has completed the revised questions.

20. What if I need more information?

CSBS will be providing Townhalls for industry.