



# AD HOC/CUSTOM REPORT REQUEST POLICY FOR INDUSTRY

Contents

BACKGROUND .....3

REPORTS IN NMLS.....3

AD HOC REPORTS.....3

CUSTOM REPORTS .....3

REPORT SECURITY LEVELS .....4

    Security Level 1 .....4

    Security Level 2 .....4

DATA REQUEST PROCESS .....4

    Security Level 1 Requests .....4

    Security Level 2 Requests .....5

PAYMENT REQUIREMENTS.....5

REPORT VALIDATION AND DELIVERY .....5

    Report Delivery Method.....5

    Alternate Delivery Method.....6

ADDENDUM ‘A’ - NMLS TERMS OF USE.....7

ADDENDUM ‘B’ – VIEW CHRI RESULTS AND CONTENT AGREEMENT .....8



## BACKGROUND

With implementation of new internal processes within companies (company and federal), as well as changes in state and federal policies and ongoing SAFE Act mandates, institutions/companies have implemented bulk review processes of existing Nationwide Multistate Licensing System and Registry (NMLS) data on their mortgage loan originators for the purpose of performing audits against their internal systems, which require data in the form of reports.

The Conference of State Bank Supervisors (CSBS) provides two types of reporting of licensing data from NMLS for state and federal industry users of NMLS:

- 1) Reports on NMLS
- 2) Ad Hoc/Custom Reports

**CSBS is under no obligation to provide either of ad hoc or custom reports and may decline or reject requests for such at its sole discretion.**

## 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.

There is no charge for 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, a company/institution may require information that is not available through a system report. NMLS provides NMLS Account Administrators with the ability to request additional information in the form of a one-time 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. If desired, company affiliates who share common ownership (parent RSSDID if institution) can be included in the parent company report. For state licensed entities, the NMLS Account Administrator must also be the same NMLS Account Administrator for the affiliates. The number of entities included in a report will be limited to 5 or less, depending on the complexity of the report. CSBS staff will work with the entity individually to develop the report parameters. Upon confirmation of the report parameters, the request will be submitted for programming. The charge for an ad hoc report will be \$190 per hour to develop, test and run the report.

## CUSTOM REPORTS

For companies who need access to information on a recurring basis, NMLS provides NMLS Account Administrators with the ability to request a custom report. CSBS staff will work with the entity individually to develop the report parameters. Upon confirmation of the report parameters, the request will be submitted for programming. The charge for a custom report will be \$190 per hour to develop, test, and automate the report. The cost for each report issuance will depend on the complexity, size of the report and number of entities included. The hourly rate will apply for enhancements made after the custom report is automated.

## REPORT SECURITY LEVELS

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, CSBS has developed a policy to address two data security levels for ad hoc/custom report requests, which are:

### Security Level 1

Reports containing (Non-Public Personal Information (NPPI\*) data, Criminal History Record Information (CHRI) indicating a Record of Arrest and Prosecution (RAP) does or does not (Clear) exist.)

### Security Level 2

Reports containing data that is not considered Security Level 1 data).

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

\*NPPI (Non-Public Personal Information) data consists of:

- 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)

## DATA REQUEST PROCESS

### Security Level 1 Requests

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:

- Name of Company/Institution
- Address of Company/Institution
- Entity NMLS IDs for subject report
- Contact Person Name (must be a NMLS Account Administrator)
- Contact Phone Number
- Authorized Recipient (must be the requesting NMLS Account Administrator)

After receipt of the necessary information, CSBS will verify the requestor is an NMLS Account Administrator for the requesting institution/company. Requests submitted by unauthorized company representatives will be rejected.

CSBS will clarify the information requested (if necessary) with the requestor to ensure that the data returned in the report meets the requestors' requirements.

For reports containing Security Level 1 data, CSBS will also send the NMLS Terms of Use (addendum A) and, if applicable, the “View CHRI Results and Content Agreement” (addendum B). Once the requester has acknowledged review of the conditions and has agreed to abide by the contents, the report request will be submitted for fulfillment of the request.

### Security Level 2 Requests

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:

- Name of Company/Institution
- Address of Company/Institution
- Entity NMLS IDs for subject report
- Contact Person Name (must be a NMLS Account Administrator)
- Contact Phone Number
- Contact Email Address (must be NMLS user account email address)
- Report criteria: (data requested)
- Email Address of Report Recipient (if not the requesting NMLS Account Administrator, it must be an organizational user with a NMLS user account email address)

After receipt of the necessary information, CSBS will verify that the requestor is an NMLS Account Administrator for the requesting institution/company. Requests submitted by unauthorized company representatives will be rejected.

CSBS 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/custom report, like the current invoicing process for filings, Agency Fee Invoicing (AFI), 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 CSBS will be performed prior to distribution of the report. CSBS maintains strict security controls as to the NMLS data viewable by CSBS personnel. Personal identifying information (PII) such as SSN or DOB, and sensitive data such as CHRI results are not viewable to CSBS support users. All sensitive information will be redacted from the report prior to validation. Once CSBS has validated the report contents, a notification will be sent authorizing the release of the full report content to the authorized recipient.

### Report Delivery Method

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

1. The report will be encrypted with WinZip using 256-bit Advanced Encryption Standard (AES) and distributed via email (ad hoc only) directly to the designated recipient. CSBS will not be included in the distribution.

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

2. A password will be sent to the recipient under separate email cover from the same email address.

For custom reports, the password will remain the same as originally provided. Custom reports require the use of Box as the distribution method.

## Alternate Delivery Method

For individuals that are unable to receive ad hoc reports as zipped email attachments, an alternate method of delivery will be used. Alternate delivery methods used by CSBS 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.