



# Amendments and Additions to the Mortgage Call Report Form Version 7

## Public Comment

December 17, 2024 – March 6, 2025\*

*\*The original deadline of February 17, 2025, has been extended to March 6, 2025.*





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## Public Comment on Amendments and Additions to the Mortgage Call Report Form Version 7

On behalf of the NMLS Policy Committee<sup>1</sup>, the Conference of State Bank Supervisors<sup>2</sup> invites public comments on proposed amendments and additions to the Mortgage Call Report (MCR) Form Version 7 (FV7).

### Background

All state-licensed companies and companies that employ state-licensed mortgage loan originators must complete the MCR. The MCR collects standardized mortgage company data at the state level for all state-licensed mortgage companies. Collecting this data allows regulators to gain insights into industry trends, helping them identify potential issues that could harm consumers.

### Public Comment Process

CSBS invites comments from all members of the public.

The NMLS Policy Committee will review and evaluate all comments received on the additions or amendments to the MCR FV7.

When providing feedback, companies and other organizations should submit one response that represents the entity's comments, feedback, and views on the additions and amendments. Submissions must include the submitter's contact information.

Comments from the public, including the submitter's name and organization will be posted on the NMLS Resource Center.

Comments should be emailed to [comments@csbs.org](mailto:comments@csbs.org).

Comment submission deadline: Thursday, March, 6, 2025 at 5 p.m. EST.

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

<sup>2</sup> Information about CSBS can be found [here](#).



## 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			
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**

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

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

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





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

**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**

- Amount and count of servicing by investor type that is actual/actual remittance type
- Amount and count of servicing by investor type that is scheduled/scheduled remittance type
- Amount and count of servicing by investor type that is scheduled/actual remittance type

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



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

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

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

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



**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	
<del>I311 – Refinance Rate Term</del>	



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.