

NMLS Release 2015.2 – Release Notes

Release Date: April 20, 2015

The purpose of these release notes is to provide a summary of system enhancements included in NMLS Release 2015.2.

Roadmap enhancements targeted for NMLS Release 2015.2 include:

- Comparison of Filing Data Against Non-Filing Events The System will create a change event when an Advance Change Notice (ACN) is processed or cancelled outside of a filing. These change events will display in the *State Historical Filings* under the *Filing* and *Composite View* tabs.
- Merge ACN List and Regulator Work List The ACN List, which contains a listing of all pending, processed, and cancelled ACNs for an agency, will be retired. Pending ACNs will be added to Regulator Work List items, and a new page listing a company or branch's ACNs will be added to the Tasks tab. The rules for generating some review items will also be updated.
- **Redline Display for ACNs** The redline view of ACNs will be updated to make the information easier to read and the progression of changes easier to follow.
- Work List Changes (My Work List and Revamped Work List Assignment Page) A new My Work List page will be created and the current Regulator Work List and Work List Assignment pages will be merged.
- Work List Assignment at the Review Item Level Regulator users will have the ability to assign work at the review item level.
- Remove State and Federal Wall for Regulatory Agencies State Regulators (with the proper role) and Federal Agencies will have the ability to view some information for entities on both the state and federal sections of the System.
- **Role-Based Two Factor Authentication** State regulator Account Administrators and designated state regulator user roles will require two-factor authentication.

Comparison of Filing Data Against Non-Filing Events

Summary: The System will create a change event when an Advance Change Notice (ACN) is processed or cancelled outside of a filing. These change events will display in the *State Historical Filings* under the *Filing* and *Composite View* tabs.

State regulators have indicated that it is difficult to review ACN events that have been processed or were cancelled outside of a filing. With this enhancement, the System will generate a change event that will be stored in the entity's *State Historical Filings* under the *Filing* and *Composite View* tabs.

The change events will mirror the Company (MU1) and Branch (MU3) filings but will not contain Individual (MU2) filings, nor will an attestation component be maintained. A new column will be added to the *State Historical Filings* page to distinguish the various change events. Entity-submitted filings will be denoted as "Filing"; the two new change events will be "ACN Processed" and "ACN Cancelled" and will be shown as submitted by "System."

An "ACN Processed" change event will occur when ACNs are processed as part of the overnight batch jobs. A single change event will be created, regardless of the number of ACNs that are processed. "ACN Cancelled" change events will occur when a pending ACN is cancelled outside of a filing. This can occur when there is a pending ACN for a control person and that individual removes access from the company, or if a company or branch has a pending ACN when their last license is terminated. One change event will be created for each cancellation, even if multiple cancellations take place at the same time.

Merge ACN List and Regulator Work List

Summary: The ACN List, which contains a listing of all pending, processed, and cancelled ACNs for an agency, will be retired. Pending ACNs will be added to Regulator Work List items, and a new page listing a company or branch's ACNs will be added to the Tasks tab. The rules for generating some review items will also be updated.

Regulator users will be able to view pending ACNs in company and branch work items for the respective entity. All ACNs (pending, processed, and cancelled) will be viewable under the *Tasks* tab when searching for the respective entity.

Within a work item, a new section will be added below the *Active Licenses* section. This new section will contain a list of all current pending ACNs for the entity, along with the following information: View icon, Change Type, ACN Updated Date, Effective Date, Notice Given (Days), Regulator Status, and Record Name. Clicking the View icon will take users to the *Manage Advance Change Notice* page (which will be renamed *Advance Change Notice Detail*) to view additional information about the ACN, update the regulator status, and view the regulator status for other relevant regulators related to the event.

A new page will be added to Company and Branch views in the Tasks tab. The new page, *Manage Advance Change Notices*, will have two grids: the first grid will contain Pending ACNs and the second will contain Processed and Cancelled ACNs. From this page, users will be able to see all ACNs for the entity, along with the following information: View icon, Change Type, ACN Status, ACN Updated Date, Effective Date, Notice Given (Days), Regulator Status, and Record Name. Clicking the View icon will take users to the *Manage Advance Change Notice* page (which will be renamed *Advance Change Notice Detail*) mentioned above.

There are also several *Regulator Work List* and review item changes that will take place in support of this enhancement. Three new columns will be added to the *Regulator Work List* (which will be renamed *Agency Work List & Assignment*). The new columns, listed below, will contain cumulative information for the work item as a whole.

- Includes ACN Yes/No indicator if at least one review item contains a new or modified ACN.
- Includes Cancelled ACN Yes/No indicator if at least one review item contains a cancelled ACN.
- Notice Given (Days) The notice provided, in days, for the ACN contained in the work item. If there are multiple ACNs in the work item, the least notice provided will display.

Merge ACN List and Regulator Work List

The review item generation rules will be updated to consolidate review items generated as part of a filing. Rather than generate separate review items for New/Amended or Cancelled ACN review items, a single review item will be generated for the filing section or data element. For example, if there are three Direct Owner/Executive Officer (DO/EO) changes in a single filing (one to add a new DO/EO, one modification that does not require ACN, and one that is an ACN cancellation) the System will generate a single DO/EO review item in a Filing Amendment work item. Due to the review items being consolidated, all of the ACN New/Amended review items will be retired. Data elements that only generate ACNs will generate the corresponding data element review item. For example, legal name changes will generate the Name Change review item. Generally, multiple changes to any given section will generate a single review item, whether the changes include standard amendments, ACNs, or both.

Review items that could contain an ACN will display two new data fields: "Includes ACN" and "Includes Cancelled ACN." These will be Yes/No indicators that are cumulative for all of the changes in that filing section.

Notifications

See the General Enhancements section for updates to notifications.

Redline Display for ACNs

Summary: The redline view of ACNs will be updated to make the information easier to read and the progression of changes easier to follow.

The redline view for ACNs will be updated in the following filing sections:

- Company Legal Name
- Company Main Address
- Company Other Trade Names
- Legal Status
- Affiliates/Subsidiaries
- Direct Owner/Executive Officer
- Indirect Owner
- Company Qualifying Individual
- Branch Main Address
- Branch Other Trade Names

The redline updates will add the label "ACN System Status" along with a "Processed" or "Cancelled" status, where appropriate, below the effective date to describe the action taken on the ACN event. Also, when an ACN is processed, the strikethrough and addition will display side-by-side rather than one on top of the other.

For Other Trade Names (Company and Branch) and Qualifying Individuals, the presentation (and subsequent redline) will be updated to improve readability. The industry types and states applicable to each record will display in a table along with the effective date for any changes relevant to them.

Work List Changes (My Work List and Revamped Work List Assignment Page)

Summary: A new My Work List page will be created and the current Regulator Work List and Work List Assignment pages will be merged.

The new *My Work List* page will be the default navigation after clicking on the *Work List* link in the submenu for Organization Users. Regulator Account Administrators will continue to navigate to the *Regulator Work List* page (which will be renamed *Agency Work List & Assignment*). The *My Work List* page will contain a list of work items currently assigned to the logged in user. Work items containing one or more review items assigned to the user will also display on the *My Work List* page. With the exception of the Assignment and Review Item Assignment filtering options, the column headers and filters on this page will be the same as the *Agency Work List & Assignment*.

The Regulator Work List and Work List Assignment pages will be merged into a single Agency Work List & Assignment page. This page will be identical to the Regulator Work List page except that users will have the ability to assign work items in bulk.

The pagination on all of the work list pages will also be updated to display 100 items per page.

Work List Assignment at the Review Item Level

Summary: Regulator users will have the ability to assign work at the review item level.

This enhancement will allow regulator users to assign work at the review item level, in addition to the current ability to assign work at the work item level. When a work item is initially assigned to a user, the assignment will cascade down to the review items contained within that work item. The review item assignment can also be updated to a different user, allowing one or more individuals to have review item assignments within a single work item. A new *Review Item Assignment* page will be added to allow users to bulk assign review items. After entering search criteria, users will be able to bulk assign review items based on the search results.

The ability to establish default assignees for work items and review items will also be added. An agency's Account Administrators (AAs) will be able to designate a default assignee for work item categories and review item types. When new work items and review items are generated, the System will automatically assign the item to the default assignee and it will become accessible from the user's *My Work List* page. Changes made to review item subscriptions and default assignments will take effect immediately, but will not be retroactive.

Only AAs and Organization Users with the "Access Work Item" role can be designated as a default assignee. If a default assignee is deleted, disabled (by an AA or the System), or the user role mentioned above is removed, the default assignment will be removed and changed to "Unassigned." In this particular scenario, both work and review items currently assigned to the user will be maintained for auditing purposes and to allow for reassignment.

Notifications

See the General Enhancements section for updates to notifications.

Remove State and Federal Wall for Regulatory Agencies

Summary: State Regulators (with the proper role) and Federal Agencies will have the ability to view some information for entities on both the state and federal sections of the System.

State regulator Account Administrators (AAs) and State regulator Organization Users (OUs) with the "View Federal Information" role will be able to view institutions and MLOs who are federally registered, but otherwise not relevant to the state context. All federal agency users will be able to view state-licensed individuals and control persons who are not otherwise relevant to the federal context. The Composite View for these entities will be blended so that state regulators and federal agencies will not have to switch contexts. Some sensitive information will not be visible to users in the non-native context.

In the state context, if the regulator user is an AA or has the "View Federal Information" role, both the company and individual composite view searches will be modified to return entities that are relevant to either the state or federal contexts. Entities that are not relevant to either context will not be returned in search results. In the federal context the individual search will be modified for all federal agency users to return individuals that are relevant to either the state or federal contexts. Individuals that are not relevant to either context will not be returned in search results. The search criteria will be updated to allow users to return entities that are relevant only to the native context. Search results will contain an "NMLS Record" indicator to identify if the entity is relevant to the State, Federal, or both contexts. This indicator will also be included on the Company Information and Individual information pages as well as the Company Snapshot and Individual Snapshot.

A new "View Federal Information" role will be introduced for state regulator OUs in support of this enhancement. State regulator AAs and State regulator OUs with this role will require two-factor authentication (more information on this in the next section of the document). State regulator AAs and OUs with this role will be able to view the following additional information for federally registered institutions and MLOs.

Remove State and Federal Wall for Regulatory Agencies

Modifications to the state context company composite view will include:

- Adding or suppressing the following information to the View Company page, which will renamed to Company Information:
 - Add the NMLS Record indicator.
 - o Add the RSSD ID, Primary Federal Regulator, Subsidiary, and Parent RSSD ID to the page for entities with a Federal base record.
 - o Suppress the EIN for companies not relevant to the state context.
- Add the MU1R Status page, which will be renamed to Federal Registration List.
- Add the *Historical Filings* (Federal) page, which will be renamed to *Federal Historical Filings*. The Company EIN will be suppressed on the historical filings.
- Adding or suppressing the following information on the *Company Snapshot* will be modified to add or suppress:
 - Add the NMLS Record indicator.
 - o Add the RSSD ID, Primary Federal Regulator, Subsidiary, and Parent RSSD ID to the page for entities with a Federal base record.
 - o Suppress the EIN for companies not relevant to the state context.

Modifications to the state context individual composite view will include:

- Suppress the Social Security Number and Mailing Address on the *View Individual Information* page, which will be renamed to *Individual Information*.
- Add the NMLS MLO Registration List page, which will be renamed to Federal Registration List.
- Add the Employment Records page, which will be renamed to Federal Employment Records.
- Add the *Historical Filings* (Federal) page, which will be renamed to *Federal Historical Filings*. The following information will be suppressed on the historical filings:
 - The following information in the Identifying information section: Gender, State of Birth, Country/Province of Birth, Home Phone, and Cell Phone.
 - o The Current Residence section.
 - The following information in the Criminal Background Check section: Eye Color, Hair Color, Height (feet and inches), Weight, and Race.
- Adding or suppressing the following information on the *Individual Snapshot* will be modified to add or suppress:
 - o Add the following new sections: MU4R Disclosure Questions, MU4R Disciplinary Actions, and NMLS MLO Registrations.
 - Suppress the following information for individuals not relevant to the state context: Gender, State of Birth, Country, Province of Birth, Mailing Address, and Cell Phone.

Remove State and Federal Wall for Regulatory Agencies

Modifications to the federal context individual composite view will include:

- Suppress the Social Security Number on the View Individual page, which will be renamed to Individual Information.
- Add the License/Registration History page, which will be renamed to State License/Registration List.
- Add the Relationships page, which will be renamed to State Relationships.
- Add the Renewal Attestation History page, which will be renamed to State Renewal Attestation History.
- Add the *Historical Filings* (State) page, which will be renamed to *State Historical Filings*. The following information will be suppressed on the historical filings:
 - o The following information for MU2 filings: Submitter, Submitting Entity ID, and Submitting Entity.
 - The following information in the Identifying information section: Gender, State of Birth, Country/Province of Birth, Home Phone, and Cell Phone.
 - The Residential History section.
 - The following information in the Criminal Background Check section: Eye Color, Hair Color, Height (feet and inches), Weight, and Race.
- Add the Education Record page.
- Add the Testing Information page.
- Adding or suppressing the following information on the *Individual Snapshot* will be modified to add or suppress:
 - Add the following new sections: License/Registration and Sponsorship Information, Company Relationship Information, Other Business, Disclosure Questions, Disclosure Explanations, Education Record, and Testing Information.
 - Suppress the following information for individuals not relevant to the state context: Gender, State of Birth, Country, Province of Birth, and Cell Phone.

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Role-Based Two Factor Authentication

Summary: State regulator Account Administrators and designated state regulator user roles will require two-factor authentication.

State regulator Account Administrators and State regulator Organization Users with the "View Federal Information" role will be required to use two-factor authentication to access the system. The first time the identified user accesses the system, they will be required to register a Symantec two-factor token. On subsequent logins, users will be required to enter their user name, password, and the security code from their token. The two-factor token required can be either a virtual or physical Symantec token.

If the role is removed, the token will be de-registered and users will no longer need the token to log in to the System.

General Enhancements – Notifications and Reports

NOTIFICATIONS

Merge ACN and Regulator Work List (State Context)

In support of the Merge ACN List and Regulator Work List enhancement, the ACN Created or Updated on filing notification will be retired. Because these actions will be included in Filing Amendment work items this notification is redundant.

Work List Assignment at the Review Item Level (State Context)

In support of the Work List Assignment at the Review Item Level enhancement, a new system email will be sent to regulator Account Administrators 15 days before the default assignee on a work item category or review item will be disabled by the System. One email will be generated per disabled user. The purpose of this email is to notify Account Administrators in case they want to ask the user to login so they will not be disabled or to reassign any default work item categories or review item assignments.

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General	Enhancements	

SCR Number	Title	Description	Context
22044	Permissible Investments Document Type Adjustment	A data fix will be deployed on Monday, May 4, 2015, to convert the Permissible Investments document to a state-specific document type for Company Document Upload. Permissible Investments documents uploaded before the data fix can be updated through a Company filing submitted after May 4, 2015, to include a state selection.	State
19730	Account Admin Streamlining	In support of streamlining account administration functions, several functions on the Admin tab have been consolidated to reduce the need to search and re-search for a user if multiple account tasks are necessary. This enhancement is being deployed to all Account Administrators in both the state and federal contexts. The following functions are now all included under the User Account Profile option on the left navigation pane: • Manage Roles • Manage User Info • Unlock Account • Enable/Disable Account • Delete Account • Reset Password	State and Federal
22074	Captcha Test for Failed Logins	Users who mistype their password twice will be required to enter a Captcha code to verify that they are a human entering their password. This is being implemented to prevent bots from attempting to access NMLS accounts.	State and Federal

SCR Number	Title	Description	Context
19756	Information Security: Non Public Personal Information (NPPI) Masking	Non Public Personal Information ¹ (NPPI) is personal identity information that is not publicly available and usually protected by state or federal law.	State and Federal
		For purposes of this enhancement, the following information will be treated as NPPI when it is displayed with the (i) first name or first initial <u>and</u> (ii) last name in NMLS: - A Company's Employer Identification Number (EIN) ² - An Individual's Social Security Number (SSN) - An Individual's Full Date of Birth (DOB) - An Individual's Government-Issued Identification Number - An Individual's Passport Number	
		The NPPI will be masked throughout the System so that only the last 4 characters are visible, with the exception of the date of birth. In that case, the month and day will be viewable, but the year will be masked. Masking will apply to all users and an audit event will be tracked if a user reveals the information.	
18595	Paging of Historical Filings in the Filings and Composite	The Historical Filings pages in the Filings and Composite View tabs will be updated in include paging of the historical filings. The default paging will be set at 15 items per page and users	State and Federal

will have the options to view 30, 60, 90, or all items on the page.

View Tabs

¹ Non Public Personal Information is a defined term within Title V, Subtitle A of Gramm Leach Bliley Act ("GLBA") which governs the treatment of nonpublic personal information about consumers by financial institutions.

For a sole-proprietor, the Company EIN could be the owner's SSN. Therefore, all Company EINs must be treated as NPPI.

SCR Number	Category	Description	Context
16792	Advance Change Notice	The system will null out the Advance Change Notice (ACN) related data when pending ACNs are cancelled outside of an MU1 filing and the company user then creates another MU1 Filing.	State
21583	Advance Change Notice	NMLS will be updated to handle the redlining correctly when Affiliates/Subsidiaries, Direct Owners and Indirect Owners are initially added.	State
18981	Composite View	NMLS will only match on the Other Business Name table when the Federal Tax ID is in the search criteria.	State
19812	Composite View	NMLS will show a single row when the company has more than one license or more than one instance of a license type with the same license number.	State
19001	Composite View	The Company Search sort order will be updated to be ascending by Company Name and Company ID.	State
21962	Data Download	NMLS will be updated to ensure Qualified Individuals (QI), Direct Owners (DO), or Indirect Owners (IO) records are only generated when the company and QI, DO or IO Individuals are relevant to the regulator.	State
22487	Work List	A bug fix will be deployed on Saturday, April 25, 2015, to correct an issue that was reported with the regulator Worklist feature as a result of the 2015.2 release that was deployed on Monday, April 20, 2015. Some regulators reported having additional Work List items appear for individuals with credit reports from prior years (e.g. 2014, 2013) that were not appearing on their Work List prior to this release. The resolution to this issue has been identified and the system maintenance will correct this issue. No additional corrective actions are required by regulators for these outstanding credit report items on their Work List.	State

Browsers Used for Testing NMLS

Manual Testing: Firefox 32 / IE9 / IE 11 for functional testing

Automation: Firefox 19 and IE9 (ad-hoc basis)

Sauce Labs is used occasionally for specific OS / Browser Combination in QC environment.