

SEPTEMBER 27, 2012

# Privacy Impact Assessment

NATIONWIDE MORTGAGE LICENSING SYSTEM AND REGISTRY

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Consumer Financial  
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## DOCUMENT PURPOSE

The Privacy Impact Assessment or “PIA” provides the public with information about the Consumer Financial Protection Bureau’s (“CFPB” or “Bureau”) collection and use of personally identifiable information (“PII”). PII is any information “that can be used to distinguish or trace an individual’s identity”<sup>1</sup> like a name, address, Social Security number, or place and date of birth. The CFPB uses PIAs to document how the PII it collects is used, secured, and destroyed in a way that protects each individual’s privacy. Each PIA is broken out into sections that reflect the CFPB’s Privacy Principles. The CFPB’s Privacy Principles are a set of nine rules the CFPB follows when it collects or uses PII.

## OVERVIEW

PROJECT / SYSTEM NAME: Nationwide Mortgage Licensing System and Registry

PROJECT/SYSTEM INCLUDES INFORMATION ABOUT:

- Federal Employees
- Contractors
- Consultants
- The Public

PROJECT/SYSTEM INCLUDES:

- Name and other biographic information (e.g. date of birth)
- Contact Information (address, ZIP code, telephone number, email address)
- Social Security number (“SSN”) or other identifier
- Financial Information
- User and Online Information
- Third Party Information
- Other Information (including biometric information and health or medical information)

The Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Act”), Public Law No. 111-203, Title X, established the CFPB. The CFPB administers, enforces, and implements federal consumer financial protection laws, and, among other powers, has authority to protect consumers from unfair, deceptive, and abusive practices when obtaining consumer financial products or services.

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<sup>1</sup> Office of Management and Budget (OMB) Memorandum 07-16, *Safeguarding Against and Responding to the Breach of Personally Identifiable Information*, May 22, 2007, (OMB M-07-16) defines PII as “information which can be used to distinguish or trace an individual’s identity, such as his or her name, social security number, biometric records, etc., alone, or when combined with other personal or identifying information which is linked or linkable to a specific individual, such as date and place of birth, mother’s maiden name, etc.”

In passing the Act, Congress also transferred regulatory responsibilities and certain supervisory authority for the Secure and Fair Enforcement for Mortgage Licensing Act (the “S.A.F.E. Act”) to the CFPB. As a result of this transfer, the CFPB, worked with the Office of the Comptroller of the Currency to take over management of the federal registry maintained in the Nationwide Mortgage Licensing System and Registry (the “NMLSR”). The federal registry is a database in the NMLSR of registered residential mortgage loan originators (“MLOs”) who are employees of a depository institution, or a subsidiary that is: (A) owned and controlled by a depository institution; and (B) regulated by a Federal banking agency; or (C) an institution regulated by the Farm Credit Administration, as set forth in 12 USC § 5102.

An MLO is someone who works for a bank (or other type of lending company), who:

- Takes a residential mortgage loan application (like an application for a home loan);<sup>2</sup> and
- Offers or negotiates the terms of the loan for compensation or gain.

The NMLSR is an online platform and information repository through which MLOs register and submit information about themselves and their backgrounds<sup>3</sup>. It is used by federal agencies with responsibility for regulating MLOs and provides consumers with free information about MLOs through the [Consumer Access Portal](http://mortgage.nationwidelicencingsystem.org/).<sup>4</sup> More information about the NMLSR is available at <http://mortgage.nationwidelicencingsystem.org/>.

You can learn more about the CFPB’s responsibility for the federal registry portion of the NMLSR through the Bureau’s SORN, [CFPB.019 – Nationwide Mortgage Licensing System and Registry \[77 FR 35359\]](#). This PIA and the associated SORN replace any previously published versions.

## **SECTION 1.0                      PURPOSE OF COLLECTION**

*The CFPB will state the purpose and legal authority for collecting PII.*

### **1.1            Why is the information being collected?**

Information in the NMLSR is used to regulate MLOs and to provide consumers with free information about MLOs through a public facing website.

### **1.2            What legal authority and/or agreements allow the information to be collected?**

The NMLSR and the federal registry are authorized by the S.A.F.E. Act as amended by the Dodd-Frank Wall Street Reform and Consumer Protection Act,

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<sup>2</sup> See Appendix A to 12 C.F.R. Part 1007(a) for examples of “taking” a loan application.

<sup>3</sup> MLOs are required to register pursuant to the S.A.F.E. Act, 12 U.S.C. § 5101 *et seq.* and its implementing regulation, 12 C.F.R. Part 1007.

<sup>4</sup> See Appendix C of this PIA for more information about the Consumer Access Portal

Pub. L. 111-203, Title X, Section 1100, codified at 12 U.S.C. § 5101 *et seq.*

- 1.3 Is the information searchable by a personal identifier – like a name or Social Security number? If so, what Privacy Act System of Records Notice(s) apply/applies to the information being collected?

Information in the NMLSR is searchable by a variety of personal identifiers as outlined in the system’s SORN, including:

- MLO Name
- Employing company
- City, state, ZIP code
- NMLSR identifier (“NMLS ID”)
- License number

- 1.4 Is there a records retention schedule that has been approved by the National Archives and Records Administration (NARA) for the information system(s)? Explain how long and for what reason the information is retained.

The CFPB maintains computer and paper records indefinitely until NARA approves the CFPB’s records disposition schedule. Records that fall under a general records schedule will be disposed of according to the applicable schedule.

- 1.5 Are there any forms or surveys that are associated with the collection of the information that would be covered by the Paperwork Reduction Act (PRA)?

The NMLSR uses two standard Uniform Mortgage Lender (“MU”) forms. The [Uniform Individual Mortgage Registration & Consent Form \(“Form MU4R”\)](#) collects registration and account information from MLOs. The [Uniform Mortgage Lender or Broker Application \(“Form MU1R”\)](#) is used to establish NMLSR accounts for federal agency-regulated institutions and designate those institution’s administrators.

- 1.6 Are there any privacy risks for this system that relate to the purpose of the collection? If so, how will the CFPB mitigate these risks?

There are no identifiable risks associated with the purpose of this system.

## **SECTION 2.0 OPENNESS AND TRANSPARENCY**

*The CFPB will be open and transparent. We should tell individuals about the PII we collect and how we will protect it, use it, and share it. We will provide an easy way for individuals to learn about what is happening to their PII.*

- 2.1 Will individuals be given notice prior to the collection of personal information about them? If

not, please explain.

Notice is provided when the account is created. MLOs and individuals acting on behalf of a federal agency-regulated institution create their own account and enter their own information into the NMLSR, or have their information entered by their employer on their behalf. CFPB employees and other federal banking agency employees have accounts created for them by their agency.

MLOs must authorize the collection of additional information beyond registration information entered.

Additionally, this PIA and the adjoining SORN provide notice of the collection of information in the NMLSR.

2.2 Will individuals be given notice prior to their information being shared? If not, please explain.

As part of the registration process, MLOs are informed that their information will be shared with their employer (the federal agency-regulated institution), the state and federal agencies that regulate their employer, with the Federal Bureau of Investigation ("FBI") as part of the required background screening process, and as otherwise authorized by the S.A.F.E. Act.

Additionally, this PIA and the associated SORN provide notice about ways in which information in the NMLSR may be shared.

2.3 Are there any privacy risks for this system that relate to openness, and transparency? If so, how will the CFPB mitigate these risks?

There are no risks associated with openness and transparency for this system.

## **SECTION 3.0 DATA MINIMIZATION**

*The CFPB will limit the collection of PII to what is needed to accomplish the stated purpose for its collection. The CFPB should keep PII only as long as needed to fulfill that purpose.*

3.1 Whose information is included in the system?

The NMLSR contains information about:

- MLOs required to register per the S.A.F.E. Act
- Individuals acting on behalf of a federal agency-regulated institution as part of the registration process
- CFPB employees, contractors, and other federal banking agency employees<sup>5</sup> (collectively referred to as "authorized agency users" for

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<sup>5</sup> Federal agency users of the NMLSR beyond the CFPB include: Office of the Comptroller of the Currency ("OCC"); Federal Reserve System ("Board"); Federal Deposit Insurance Corporation ("FDIC"); National Credit Union Administration ("NCUA"), and the Farm Credit Administration ("FCA"). Collectively, for the purposes of this PIA, these agencies are referred to as "the banking agencies."

the purpose of this PIA) who use the NMLSR as part of their official duties or manage the system on behalf of the CFPB

### 3.2 What PII will the system include?

PII about MLOs in the NMLSR includes:

- MLO name (first, last, middle) and former or other names if applicable
- Suffix
- Social Security number (“SSN”)
- Date of birth (“DOB”) and place (state/country/province) of birth
- Gender
- Business address, phone, mobile phone, fax and email address
- Residential address and email address
- State license(s) held, status, and related license numbers<sup>6</sup>
- Date the employee became an employee of the federal agency-regulated institution
- Current employer and financial services-related employment and history for the past 10 years including employer name, dates, and addresses
- Criminal history involving certain felonies and misdemeanors
- History of financial services-related civil actions, arbitrations and regulatory and disciplinary actions or orders<sup>7</sup>
- Financial services-related professional license revocations or suspensions
- NMLS ID
- Fingerprint and accompanying data as required for background checks performed on NMLSR registrants by the FBI and the results of those checks<sup>8</sup>, including:
  - Eye color
  - Hair color
  - Height
  - Weight
  - Race

PII about employees acting on behalf of a federal agency-regulated institution includes name, business address, email address, and phone number. PII about authorized agency users includes name and title or role within their respective agencies.

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<sup>6</sup> MLOs that register in the NMLSR based on the federal requirement outlined in the S.A.F.E. Act and its implementing regulation, 12 C.F.R. Part 1007, are not obligated to submit data on state license(s) held, status, and license numbers because that information is already populated by the NMLSR.

<sup>7</sup> As disclosed by the MLO in response to disclosure questions in the MU4 or MU4R forms. See Section 1.5 for more information.

<sup>8</sup> Beyond the MLO who submits it, access to information required by the FBI to conduct a background is limited to the FBI for the purposes of conducting the required check and to the MLO’s employing institution, which are required under the governing regulation to review information and may make employment and disciplinary decisions based on those results. More information is available under Appendix A of this PIA. Please note that since employees of the FBI are not users of the system, they are not reflected in Appendix A.

### 3.3 Why is the collection and use of the PII necessary to the project or system?

The NMLSR collects PII about MLOs and employees acting on behalf of a federal agency-regulated institution as required by the S.A.F.E. Act, and about authorized agency users for granting access to the system as part of their official duties.

In general, PII about MLOs in the NMLSR is used:

- To identify individuals acting as an MLO, create a unique account and issue a NMLS ID for each MLO (the registration process);
- To communicate with MLOs regarding their federal registration;
- By the banking agencies in any enforcement or disciplinary proceedings or complaint-related inquiries concerning an MLO; and
- By federal agency-regulated institutions that employ MLOs as necessary for taking disciplinary actions or making employment decisions.

### 3.4 Will the system aggregate previously unavailable data about the individual or create new data about the individual? If so, how will this data be maintained and used?

The NMLSR creates and assigns MLOs a unique NMLS ID which is made available to the public and is used to search the system for information about an MLO. The system does not aggregate previously unavailable data about the individual.

### 3.5 What controls exist to protect the consolidated data and prevent unauthorized access?

The NMLS ID created by the system is publicly available and does not require additional protections to prevent unauthorized access.

### 3.6 Will the system monitor the public?

The system does not monitor the public.

### 3.7 Will the system monitor employees or contractors?

The system monitors use by employees for auditing purposes only.

### 3.8 What kinds of reports can be produced on individuals? Will the data included in the reports produced be made anonymous?

Federal agency-regulated institutions can access the following reports about individual MLOs:

*Individual Roster Report:* contains a list of the institution's associated MLOs and their registration status.

*Criminal Background Check Report:* contains both the information submitted by the MLO for the FBI criminal background check and the result of that check. Also includes an indicator of whether the MLO has submitted electronic fingerprints to the NMLSR (this may be combined with the report above). These reports are only available to federal agency-regulated institution users.

Authorized agency users can access the following reports about individuals:

*Individual Roster Report:* contains a list of MLOs under a particular agency's authority, including each MLO's NMLS ID, name, and registration status. The institution associated with each MLO will also be listed. Authorized agency users will have the option to include all federal agency-regulated MLOs under their authority in the report, or limit the report to MLOs at a specific institution.

The NMLSR also provides ad-hoc reporting services to supplement the reporting and download capabilities. Ad hoc reports are available (for a fee) only to authorized recipients and come in a variety of formats and contain non-sensitive information relevant to the requesting institution or agency only.

Limited information about MLOs is also publicly available through the Consumer Access Portal, as outlined in Appendix C of this PIA.

- 3.9 Are there any privacy risks for this system that relate to data minimization? If so, how will the CFPB mitigate these risks?

There are no risks associated with data minimization for this system.

## **SECTION 4.0 LIMITS ON USES AND SHARING OF INFORMATION**

*The CFPB will publish a notice about how we plan to use and share the PII that we collect from you. We will only share your PII in ways that are compatible with the notice or as stated in the Privacy Act.*

- 4.1 Is the information in the project limited to only the information that is needed to carry out the purpose of the collection?

All information collected about MLOs and employees acting on behalf of a federal agency-regulated institution is required by the S.A.F.E. Act to fulfill supervisory and examination responsibilities for the relevant federal agencies. Information about authorized agency users is required to grant system access. Section 3.0 has more information about what is collected by the system and how it is used.

- 4.2 Will the CFPB share any of the information with other individuals, Federal and/or state agencies, or private sector organizations? If so,

## how will the CFPB share the information?

The NMLSR is a web-based system accessible by the CFPB and the banking agencies. Each agency may access public information about MLOs as well as non-public information about MLOs only to the extent that such MLOs are subject to their exclusive or shared jurisdiction.

Internally, each agency may share non-public information, in the form of reports or through access to the system, with authorized agency users who demonstrate a *bona fide* need to know the information.

Externally, each agency with access to the NMLSR may share information as described under the “Routine Uses” section of the related SORN through secure methods. Before disclosing non-public PII from any federal record in the NMLSR to a third party, the disclosing agency must alert the CFPB and the regulating agency with authority for the institution to which the record relates.

The public may access all information made available through the Consumer Access Portal as outlined in Appendix C.

### 4.3 Is the information collected directly from the individual or is it taken from another source?

Information is entered into NMLSR by authorized system users, including:

- Federal and state agency authorized users
- MLOs who are registered or are registering (limited to their own information)
- Agency-regulated financial institution users, financial institution system administrators and other institution officials
- NMLSR Call Center Help Desk employees (system development staff and operators of the system)

More information about the registration process, including the creation of user accounts, is available under Sections 2, 5, and 6 of this PIA.

### 4.4 Will the project interact with other systems, whether within the CFPB or outside of the CFPB? If so, how?

Currently the NMLSR is not connected to any external systems. Information from the NMLSR is uploaded to the Consumer Access Portal, which is physically separated from the database that stores the non-public information, on a nightly basis. Additionally, each agency which uses the system may download reports and include such downloads on local drives or in their own systems.

### 4.5 Are there any privacy risks for this project that relate to use limitation? If so, how will the CFPB mitigate these risks?

There are no risks associated with use limitation for this system.

## SECTION 5.0 DATA QUALITY AND INTEGRITY

*The CFPB will make reasonable efforts to ensure that all PII it maintains is accurate, relevant, timely, and complete.*

### 5.1 How will the information collected be verified for accuracy and completeness?

Individual MLOs registering, renewing or updating a registration in the NMLSR are responsible for submitting accurate information, and must:

- Authorize the NMLSR and the employing institution to obtain additional information outlined in Section 3.1; and
- Attest that all information submitted is correct, whether submitted by the employee or on behalf of the employee.

MLOs must renew their registration each year to confirm that previously submitted information remains accurate and make updates as needed. Additionally an MLO's information must be updated within 30 days of any of the following events:

- A change in the MLO's name
- An MLO ceases to be an employee of the federal agency-regulated institution; or
- Any of the MLO's responses to the information required for original registration become inaccurate.

For each employee who acts as an MLO, personnel for the institution which employs the MLO must provide:

- Confirmation that the institution employs the MLO; and
- Within 30 days of the date the MLO ceases to be an employee of the federal agency-regulated institution, notification that it no longer employs the MLO and the date the MLO ceased being an employee.

When creating or maintaining an account, users have the option of a pre-populated drop down list for several fields to reduce the likelihood of inconsistencies. The NMLSR also has built in "completeness" checks that determine if all required fields are completed at the time of account creation or updates. Additionally, Call Center Help Desk staff for the system review information to verify that required fields are completed.

In addition to the system's technical capabilities, federal regulations require federal agency-regulated institutions that employ MLOs to adopt and follow written policies and procedures to assure compliance with the registration process, including confirming the accuracy of MLO registrations, updates and renewals.

### 5.2 Are there any privacy risks for individuals whose information is collected or used by the project that relate to data quality and integrity? If

so, how will the CFPB mitigate these risks?

There are no risks associated with data quality and integrity for this system.

## **SECTION 6.0 SECURITY**

*The CFPB must protect PII from loss, unauthorized access or use, destruction, modification, or unintended or inappropriate disclosure.*

### **6.1 Who will have access to the data in the project? What is the authorization process for access to the project?**

Sections 3.8 and 4.2 explain how information about individuals in the system may be accessed through reporting functions.

More general system access is granted to the population described in Section 4.3. User privileges are determined by the user roles outlined in Appendix B of this PIA. Not all information (including PII) included in the NMLSR is available to all system users. Appendix A provides a matrix of which information is available to which users. Agencies grant their authorized agency users access as necessary to carry out official duties. Agencies are also responsible for developing internal policies and procedures for access and for ensuring that established rules of behavior are in place and adhered to. Access for contractor employees who manage the system is controlled by the contractor. The NMLSR requires each user of non-public information to have a log on ID and password, and to sign a user agreement prior to access. Additionally, authorized agency users with access to multiple federal agency-regulated MLO records must have a second factor login. Privileged Users, a subset of authorized agency users who operate and maintain the system, are subject to additional requirements before being granted access to privileged functions.

MLOs and federal agency-regulated institution employees seeking access must request that an account be set up via the forms discussed in Section 1.5, and requests are validated as outlined in Section 5.1. Once an account is established, information access is granted based on defined user roles.

### **6.2 Has the CFPB completed a system security plan for the information system(s) supporting the project?**

The CFPB has completed an evaluation of the NMLSR National Institute for Standards and Technology (“NIST”) compliant System Security Plan (“SSP”). The SSP and related artifacts are maintained and managed by the contractor operating the NMLSR.

### **6.3 How will the system be secured?**

The system includes multiple technical, physical, and administrative controls.

In addition to the access processes discussed in Section 6.1, the system also employs automated mechanisms to support the management of accounts.

These mechanisms automatically terminate temporary and emergency accounts after 24 hours. The NMLSR automatically disables inactive accounts after:

- 120 days of inactivity for Privileged Users; or
- 15 months of inactivity in the system for MLOs.

Accounts are also moved into a “Registered-Inactive” status when:

- The MLO fails to renew their registration within the renewal time period; or
- The individual’s employment with the regulated institution is terminated and no other employment(s) remain.

The system uses automated mechanisms to audit account creation, modification, disabling, and termination actions, and, as necessary notify appropriate individuals.

All data exchanges take place over encrypted data communication networks, private networks and encryption technologies are used during the transfer of information. Additionally, the Consumer Access Portal is physically separated from the database that stores non-public information.

The NMLSR is categorized as a Federal Information Security Management Act (“FISMA”) “moderate” level system and is responsible for meeting all requirements at that designation, including OMB regulations<sup>9</sup> and NIST guidance.

#### 6.4 Are there mechanisms in place to identify security breaches? If so, what are they?

The contractors responsible for managing the NMLSR have established an internal incident response capability and audit event logs for the system. The contractor will immediately notify all of the agencies which use the system if any suspected or actual data breach occurs. Notification is through a single point of contact at the CFPB.

#### 6.5 Are there any privacy risks for this system that relate to security? If so, how will the CFPB mitigate these risks?

There are no identifiable risks for this system that relate to security.

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<sup>9</sup> Although pursuant to Section 1017(a)(4)(E) of the Consumer Financial Protection Act, Pub. L. No. 111-203, the CFPB is not required to comply with OMB-issued guidance, it voluntarily follows OMB privacy-related guidance as a best practice and to facilitate cooperation and collaboration with other agencies.

## **SECTION 7.0 INDIVIDUAL PARTICIPATION**

*The CFPB will give individuals, in most cases, the ability to access their PII, and allow them to correct or amend their PII if it is inaccurate.*

- 7.1 What opportunities are available for individuals to consent to uses, decline to provide information, or opt out of the project? If no opportunities are available to consent, decline or opt out, please explain.

MLOs are required to register and provide all required information concerning their identity outlined in Section 3.0. MLOs must also consent to the collection of additional information about them, and to the use and sharing of their information as required by the S.A.F.E. Act.

Federal agency-regulated institution employees and agency authorized users may be required to provide information for account creation in the system if their job function or official duties require NMLSR access.

- 7.2 What procedures will allow individuals to access their information?

MLOs and federal agency-regulated institution employees can access, manage and update most of their information in the NMLSR. Additionally, the CFPB offers a means through the Privacy Act for individuals to access, amend, or correct, their records. Information about Privacy Act requests is available in the SORN for the NMLSR and at [www.consumerfinance.gov/foia](http://www.consumerfinance.gov/foia).

- 7.3 Can individuals amend information about themselves in the system? If so, how?

Yes. More information is available in Section 7.2.

- 7.4 Are there any privacy risks for this system that relate to individual participation? If so, how will the CFPB mitigate these risks?

There is a risk that individuals will not be able to decline to provide certain information in the system. This risk is acceptable because individuals acting as MLOs are required to provide information as part of the registration process and institutions which employ MLOs are required to provide information related to the registration of MLOs.

## **SECTION 8.0 AWARENESS AND TRAINING**

*The CFPB will train all personnel about the proper treatment of PII.*

- 8.1 Describe what privacy training is provided to users, either generally or specifically relevant to the project.

As described in Section 6.1, each agency manages access for its own employees, and is responsible for establishing and enforcing rules of behavior.

The CFPB requires all of its employees to complete privacy and security training. Employees of the contracting firm which operates the NMLSR are required to complete privacy and security training annually, and to execute a non-disclosure agreement prior to being granted access to the system.

Additionally, contractor currently responsible for operating the system have provided training resources for proper use of the system, including quick reference guides on the NMLSR Resource Center web page, and provides additional training on use of the system as requested for a fee.

8.2 Are there any privacy risks for this system that relate to awareness and training? If so, how will the CFPB mitigate these risks?

There are no risks associated with awareness and training for this system.

## **SECTION 9.0 ACCOUNTABILITY AND AUDITING**

*The CFPB is accountable for complying with these principles. We will regularly check that we are meeting the requirements and take appropriate action if we are not doing so.*

9.1 How does the system ensure that the information is used in accordance with the stated practices in this PIA?

The CFPB, in conjunction with the contractors operating the system, has implemented technical and administrative controls as outlined in this PIA to ensure the confidentiality, accuracy and, integrity of information in the NMLSR.

Additionally, other agencies with access to and use of the system are statutorily responsible for developing policies and procedures around their use of the NMLSR.

9.2 Are there any privacy risks for this system that relate to accountability and auditing? If so, how will the CFPB mitigate these risks?

There are no privacy risks for the NMLSR that relate to accountability and auditing.

## APPENDIX A

### INFORMATION ACCESS MATRIX

DATA ELEMENT	MLO	Federal Agency-Regulated Institution With Relevance (MLO employer)	Federal agency With Relevance (MLO regulator)	Federal agency Without Relevance	General Public (Consumer Access)
MLO name	A,C,V	A,C,V,R	V,R	V	V
Social Security number	A,C <sup>1</sup> ,V	A,C <sup>1</sup> ,V,R	V <sup>2</sup>		
Date of birth	A,C <sup>1</sup> ,V	A,C <sup>1</sup> ,V,R	V <sup>2</sup>		
Gender	A,C,V	A,C,V,R	V,R	V	
State of birth	A,C,V	A,C,V,R	V,R	V	
Country of birth	A,C,V	A,C,V,R	V,R	V	
Business phone	A,C,V	A,C,V,R	V,R	V	V
Mobile phone	A,C,V	A,C,V,R	V,R	V	
Business fax	A,C,V	A,C,V,R	V,R	V	
Email address	A,C,V	A,C, V,R	V,R	V	
Other first, last or middle name (if applicable)	A,C,V	A,C,V,R	V,R	V	V
Suffix	A,C,V	A,C,V,R	V,R	V	V
Employment history	A,C,V	A,C,V,R	V,R	V	V
Current residential address	A,C,V	A,C,V,R	V,R		
Current business address	A,C,V	A,C,V,R	V,R	V	V
NMLS ID	V	V,R	V,R	V	V
History of financial services-related civil actions, arbitrations and regulatory and disciplinary actions or orders and any financial services-related professional license revocations or suspensions	A, V	V,R	V,R	V	V
Fingerprint and accompanying data required for FBI background checks and the results of those checks	A	VR			

#### Key:

A=Add

C=Change

V=View

R= See in a Report

#### Footnotes:

1) Processed through entitlement group

2) Must have confidential role

## APPENDIX B

### NMLSR USER ROLES AND PRIVILEGES

ROLE	ACCESS/PRIVILEGES
Privileged User (contractor operating system / federal agency ONLY)	All privileges as outlined below, plus privileged functions related to database management such as the ability to create fields within the data structure, audit the system for misuse, create user roles and assign privileges, etc.
Account Administrator (company/federal agency)	Create account Modify account information Update user account role Unlock user accounts Enable or disable user accounts Delete user accounts View individual composite View institutional composite View confidential information
Organization User (federal agency-regulated institution employee)	Create and submit MU1R forms Manage notification contacts Create and submit MU4R forms Manage institution relationships View individual composite View subsidiary composite View confidential information Manage reports Renewals
Organization User (authorized agency user)	Mange notification contacts View individual composite View institution composite Manage data downloads Manage reports
Individual User (MLO)	Create individual account Create password Change password as well as question and answer

## APPENDIX C

### CONSUMER ACCESS PORTAL

The S.A.F.E. Act requires public access to the employment history of and publicly adjudicated disciplinary and enforcement actions against mortgage loan originators. The Consumer Access Portal meets this requirement by providing the public:

- MLO name (first, last, middle) and former or other names or aliases if applicable
- Current employer and financial services-related employment and history for the past 10 years including employer name, dates, and addresses
- Business contact information including address and phone
- History of financial services-related civil actions, arbitrations and regulatory and disciplinary actions or orders and any financial services-related professional license revocations or suspensions; and
- NMLS ID.

Information in the Consumer Access Portal is refreshed on a nightly basis. The information displayed will be viewable for five years after the MLO record becomes “inactive,” after which, it will no longer appear on the Consumer Access Portal website but will remain in the NMLSR. If the MLO “re-activates,” the information will be viewable again.

The Consumer Access Portal is available at <http://www.nmlsconsumeraccess.org/>.