 Date Completed: 12/1/16

SAFE Act Questionnaire

**Auditor:** «saname»

**Interviewee Name and Title:«**siname»

***Training***

What is the training process for new MLOs?

How soon do new MLOs receive SAFE Act training following their hire date?

Does the Bank have annual training for existing MLOs?

What is the process?

Who is responsible for conducting new and existing MLO training?

Who is responsible for monitoring training attendance?

***Application/Negotiation of Mortgage Loans/Application Documents***

What products does the Bank offer that are covered under the SAFE Act? (Residential mortgages, HELOCs/HE Loans, Unsecured Home Improvement Loans)

How are residential mortgage applications accepted?

What is the origination system that is used?

Is the application mailed with the applicable disclosures if the app not taken in person?

How are HELOCs/HE Loan applications accepted?

What is the origination system that is used?

Is the application mailed with the applicable disclosures if the app not taken in person?

Do branch employees perform any MLO-related functions? If so, which roles, and are they counted as MLOs?

***Registration Process***

Who is responsible for identifying applicable employees who will require NMLS registration?

Who is responsible for registration of these employees?

Who is responsible for monitoring all registered employees to ensure they maintain proper registration?

Who is the NMLS Administrator? Secondary administrator?

Are these employees involved in the origination or lending processes (or registered as an MLO)?

How does the registration process work?

Who will assist the employee with the registration process?

How are fingerprinting appointments handled?

Who is responsible for attestation and submitting the employee information?

Who will associate the new MLO with the Bank?

Who is responsible for performing and reviewing background checks?

What is the process if the background check identifies suspect or negative information?

Have there been any instances of this?

What is the process for employees obtained through a merger, acquisition or who transition into an MLO position (if applicable)?

What is the time frame for mergers/acquisitions (if applicable)?

How is the enrollment process handled?

What is the time frame for promoted employees?

May employees originate loans before they obtain an active registration?

What is the process for employees that have previously registered with another financial institution?

Who is responsible for changing the employment information?

What is the process if the fingerprints and background checks are no longer valid?

Who is responsible for monitoring for changes in personal data? How often?

What is the time frame to update information after a change has occurred?

What is the annual renewal process?

What is the time frame for notifying NMLS if an employee leaves or is terminated?

Who is responsible for updating the information in NMLS?

***Unique Identifier***

When are MLOs required to disclose the NMLS number? (What documents?)

Does the unique identifier automatically populate in the Loan Origination Systems?

Does the Bank’s identifier automatically populate?

Does the Bank include the NMLS number of business cards? Emails (not expressly required, but the Bank may be complying by including it on these documents)?

Is the NMLS number provided upon request?