**SAFE ACT CLIENT QUESTIONARRIE**

***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 a

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?