Union Bank’s
NMLS REGISTRATION GUIDE

PREVIOUSLY REGISTERED
Mortgage Loan Originator (MLO)
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1.0 **S.A.F.E. ACT**

1.1 **Background**

The Secure and Fair Enforcement for Mortgage Licensing Act (S.A.F.E. Act), enacted on July 30, 2008, mandates a nationwide licensing and registration system for mortgage loan originators (“MLOs”).

The S.A.F.E. Act requires an employee who acts as a residential MLO to register with the Nationwide Mortgage Licensing System and Registry (NMLS), obtain a unique identifier (NMLS ID), and maintain the registration in order to submit mortgage loan applications. This identifying number will follow the MLO throughout his/her career.

**UNION BANK (“bank”) is required to comply with the S.A.F.E. Act requirements by having each MLO:**

1. Register in the NMLS
2. Obtain a unique identifier (NMLS ID)
3. Maintain registration
4. Complete and attest to the MU4R filing
5. Furnish fingerprints for submission to the Federal Bureau of Investigation (FBI) and any other relevant governmental agency for a state and national criminal history background check
6. Provide 10 years of financial services related employment history and experience
7. Authorize the NMLS to obtain information related to any administrative, civil, or criminal findings by any government jurisdiction

1.2 **Registration Overview for Previously Registered MLOs**

The S.A.F.E. Act requires an employee who acts as a residential MLO to register with the Nationwide Mortgage Licensing System and Registry (NMLS). As a previously registered MLO, you will first grant Union Bank access to your account. The bank will then initiate the MU4R attestation process.

After receiving an email from the NMLS requesting attestation, you will then complete the MU4R filing by confirming/updating your current home address, any past names used (e.g., maiden name), personal email address, financial services related employment history, and agree to a criminal background check using your existing fingerprints (taken within the last 3 years) on file with the NMLS.

The NMLS will provide Union Bank with a criminal history background report. Once the report is reviewed by the bank and employment confirmed, you will receive an automated message notifying you of your completed registration within the NMLS.

1.3 **Expenses**

The bank will automatically pay for registration costs associated with the NMLS once the MLO’s MU4R form is submitted.

2.0 **REGISTRATION PROCESS**

The following process assumes you have previously registered within the NMLS. To activate your registration under Union Bank, you must use the Institution Access functionality in the NMLS to allow the bank to view and manage your information.

By granting Union Bank access to your record, the bank will be able to access your record until you remove access or the employment has been terminated. Once your institution confirms employment and your registration is active, you cannot remove access unless you or the institution terminates your employment record.

**Note:** You cannot act as an MLO for Union Bank if you are not registered as an active MLO under the bank.
2.1 Granting Union Bank Access

The following steps will guide you through the process of granting Union Bank access to your NMLS record.

1. Navigate to the NMLS Resource Center at: [http://fedregistry.nationwidelicensingsystem.org](http://fedregistry.nationwidelicensingsystem.org)
2. Click Log in to NMLS in the upper right corner.
3. Enter user name and password.
4. Click Log In.

5. Click the Filing tab on the top right corner of the welcome screen.

6. Click Institution Access on the sub-menu at the top of the screen.
7. Click **Add** in the “Institution Access” screen.

8. Enter “539249” in the NMLS ID field.
9. Click **Search**.

10. Select Union Bank by clicking the checkbox next to the bank’s ID number.
11. Click **Save**.

At this point, you have completed the process of granting Union Bank access to your NMLS record.

**2.2 MU4R Filing**

The MU4R is the filing used by MLOs to submit information required to obtain and maintain registrations. Once you have granted Union Bank access, you will receive an email from the NMLS indicating that Union Bank has created an MU4R on your behalf requiring attestation. The MU4R filing will take approximately 15 - 30 minutes to complete.
Note: As you have previously submitted an MU4R filing, some fields will be pre-populated with information you have previously provided to the NMLS.

2.2.1 NMLS Email

After completing steps described in section 2.1 above, you will receive an email within 48 hours from the NMLS that indicates that Union Bank has created an MU4R on your behalf. The email will look similar to the example provided below.

Once the email has been received, you should navigate to the NMLS https://federal.statemortgageregistry.com/Public/Login.aspx and log into your account.

2.2.2 Log In

1. Enter your user name and password.
2. Click Log In.
2.2.3 Completing the MU4R

1. To begin completing the MU4R form, click the Filing tab on the top right corner of the welcome screen.

2. From the "Pending Filings" screen, click the symbol outlined below to begin the process of editing your MU4R filing.

Note: Do not click on “CREATE NEW FILING”

MU4R Filing – Identifying Information

This section is used to record information pertaining to your full legal name, place of birth, and contact information. It can also be used to amend your legal name.

1. Confirm and update (as necessary) all of the requested information.

   Note: The NMLS suggests using your personal email address in the field below. As previously noted, the NMLS ID will continue to follow you for the rest of your career as an MLO, regardless of your place of employment.

2. Once all of the information has been provided, click Save.
MU4R Filing – Other Names

The section is used to record any names other than your legal name(s) that are being used or have been used in the past since the age of 18. This includes nicknames, aliases, and names used before or after marriage.

1. Click Other Names from the left menu bar.
2. If any of these instances apply click Add.

Once this section has been completed click on “Employment Records” in the navigation menu on the left side of the screen.

MU4R Filing – Employment Records

The S.A.F.E. Act requires that all registered MLOs provide the last ten years of financial services related employment history. MLOs do not need to account for their period(s) of employment working in other fields outside of the financial services related industry or time spent in school.

For example, an MLO who graduated from University in 2005 and started working at XYZ Bank immediately after graduation would only report their last six years working in the financial services industry.

An MLO, who graduated in 2000 and went to work for an engineering company for four years prior to working at XYZ Bank in 2004, would not need to disclose their employment at the engineering company, only their employment at XYZ Bank.
As you have previously completed an MU4R you must update your employment history for your new position at Union Bank. If you worked in another financial services related position prior to joining Union Bank, and after you left your prior MLO position, you must provide that information as well.

To update your employment history for your new MLO position at Union Bank:

1. Click **Employment Records** from the left menu bar.
2. Enter the NMLS ID for Union Bank: 539249.
3. Click **Search**.
4. Click the checkbox next to **Union Bank**.
5. Click **Select**.

On the following screen:

1. Provide the address of your new work location with Union Bank.
2. Click the checkbox identifying Union Bank as your current employer.
3. Click **Save**.
At this point your current employment record has been successfully completed. In addition to adding Union Bank as your current employer, please ensure you have accounted for all financial services related employment for the last ten years.

To add a prior employment record:

1. Click the Filing tab on the top right corner of the NMLS Home screen.
2. Click MU4R on the sub-menu at the top of the screen.
3. Click Employment Records from the left menu bar.
4. Click Add Prior.

5. Complete all fields and click Save.

6. Continue these steps until your last ten years of financial services related employment history have been created and saved.
MU4R Filing – Current Residence
This section is used to gather the street address for your current primary residence.

Note: This information will not be accessible to consumers.

1. Click Current Residence from the left menu bar.
2. Complete/update all fields.
3. Click Save.
4. Click Next to move to the next section Disclosure Questions.

MU4R Filing – Disclosure Questions
This section is used to gather responses to disclosure questions. This section will be pre-populated with your responses from your previous MU4R filing. Review and update your previous responses (as necessary). Ensure that all questions are answered “yes” or “no”:

Criminal Disclosure

(A) Have you ever pled guilty of or pled nolo contendere ("no contest") in a domestic, foreign, or military court to any criminal offense involving dishonesty, breach of trust, or money laundering or agreed to enter a pretrial diversion or similar program in connection with the prosecution of such offense(s)?

(B) Based upon the activities that occurred while you exercised control over an organization, has any such organization ever been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to any criminal offense involving dishonesty, breach of trust, or money laundering or agreed to enter a pretrial diversion or similar program in connection with the prosecution of such offense(s)?

Civil Judicial Disclosure

(C) Has any foreign court ever:

(1) Enjoined you, or taken action against you, in connection with any financial services related activity?
(2) Found that you were involved in a violation of any financial services-related statute(s) or regulation(s)?
(3) Dismissed, pursuant to a settlement agreement, a financial services-related civil action brought against you by a State, Federal, or foreign financial regulatory authority?

Regulatory Action

(D) Has any State or Federal regulatory agency or foreign regulatory authority ever:

(1) Found you have made a false statement or omission or been dishonest, unfair, or unethical?
(2) Found you to have been involved in a violation of a financial services-related business regulation(s) or statute(s)?

(3) Found you to have been the cause of a financial services-related business having its authorization to do business denied, suspended, revoked, or restricted?

(4) Entered an order against you in connection with a financial services-related activity?

(5) Denied, suspended, or revoked your registration or license to engage in a financial services-related activity, disciplined you, or otherwise by order, prevented you from associating with a financial services-related business or restricted your activities?

(6) Barred you from association with an entity or its officers by such agency or foreign financial regulatory authority or from engaging in a financial services-related business?

(7) Issued a final order against you based on violations of any law or regulations that prohibit fraudulent, manipulative, or deceptive conduct?

(E) Have you ever had an authorization to act as an attorney, accountant, or State or Federal contractor that was revoked or suspended?

**Customer Arbitration/Civil Litigation Disclosure**

(F) Have you ever been named as a respondent/defendant in a financial services-related consumer arbitration or civil litigation which:

(1) Resulted in an arbitration award or civil judgment against you, regardless or amount, or that required corrective action; or

(2) Was settled for any amount?

The following are screen prints of the questions as they will be presented to you.
1. Click **Save** when complete.
2. Click **Next** to move on to the next section.

**Disclosure Explanations**

Disclosure Explanations are not required, however, may be provided for each disclosure question with a “yes” response. You may also provide a .pdf file containing any necessary supporting documents for each Disclosure Explanation. All Disclosure Questions must be answered and only “yes” responses will accept a Disclosure Explanation. No explanation may be provided for Disclosure Questions with a “no” response.

**Note:** This information will not be accessible to consumers.

1. Click **Add** to provide an explanation(s) and supporting document(s) (if available).

For additional instructions on how to provide an explanation/document, please review this guide:

**MU4R Filing – Criminal Background Check**

The S.A.F.E. Act requires all state-licensed and federally-registered MLOs to complete a criminal background check and submit fingerprints to the FBI. MLOs will use the NMLS to request a criminal background check using existing fingerprints from your prior filing as part of the MU4R submission process for Union Bank. If there are no fingerprints on file with the NMLS or the MLO’s fingerprints are more than three years old the MLO will be required to submit new fingerprints to the NMLS.

For MLOs with fingerprints on file with the NMLS that are less than three years old, to request a criminal background check:

1. Click the checkbox indicating **“I am requesting a Federal Criminal Background Check.”**
2. Select **Use Existing Prints**.
3. Complete the “Demographics” section.
4. Click **Save** and then **Next**.

For MLOs without fingerprints on file with the NMLS or for MLOs whose fingerprints are greater than 10 years old, to request a criminal background check:

1. Click the checkbox indicating **“I am requesting a Federal Criminal Background Check.”**
2. Select **Submit New Prints**.
3. Complete the “Demographics” section.
4. Click **Save** and then **Next**.
Refer to section 3.0 for details step-by-step instructions on how the MLO can submit fingerprints to the NMLS.

MU4R Filing – Completeness Check and Submit

Upon completing the applicable sections of the MU4R, a completeness check must be performed before the filing can be submitted.

1. The completeness check is initiated by clicking **Next** on the previous screen.

   If the filing does not pass the completeness check, the screen will list the section(s) within the filing where an error has occurred, and a description of the error(s) that exist. Clicking the “Section” link will return to the screen so the error may be corrected.

When your filing has passed the completeness check you will be asked to attest to your filing.

2. Select **Attest and Submit**.
Once the filing has processed, the filing will navigate to the "Pending Filings" screen.

**Note:** The status of the MU4R for Union Bank will be updated to “Attested.”

At this point you have completed your MU4R Filing.

### 3.0 CRIMINAL BACKGROUND CERTIFICATE AND FINGERPRINTING PROCESS

Once you receive an email similar to the notification provided below, you are now ready to print out your Criminal Background Check (CBC) certificate and follow the established fingerprinting process.
Note: If you are currently waiting to schedule your fingerprinting appointment but have not received the notification above and it has been more than two business days since you have attested to your MU4R filing, please contact your recruiter. You will then be given instruction when to schedule your fingerprinting appointment by following the steps below.

3.1 Criminal Background Check Certificate

To obtain your CBC certificate:

1. Navigate to the NMLS Federal Resource Center: [http://fedregistry.nationwidelicensingsystem.org](http://fedregistry.nationwidelicensingsystem.org)
2. Select Log in to NMLS in the upper right corner.
3. Select the Composite View tab in the top right corner.
4. Select View Individual on the sub-menu at the top of the screen.
5. Select **View Criminal Background Check Requests** from the left menu bar.

   **NOTE:** From this page, you can view the status on an existing request or click the link to retrieve a copy of your CBC Certificate and to access the link to the NMLS-approved fingerprint vendor’s (FieldPrint’s) scheduling site to make an appointment to have your fingerprints captured.

6. Click **CRIMINAL BACKGROUND CHECK CERTIFICATE** in the highlighted information message to access your CBC Certificate.

   ![Criminal Background Check Certificate](image.png)

   The following is an example of the Criminal Background Check Certificate.

   ![Example Certificate](image.png)

**3.2 Fingerprinting Process**

The NMLS and its fingerprint vendor, FieldPrint, have established a helpline for questions regarding the fingerprinting process. The helpline is (877) 614-4361 and is available from 9AM to 7PM EST. You will have two options to complete your fingerprinting requirements using the LiveScan method:

**Option 1:** To obtain your fingerprints using the NMLS network of LiveScan locations administered by FieldPrint, you will be required to schedule your appointment from the Criminal Background Check certificate page by clicking on “SCHEDULE YOUR APPOINTMENT NOW.” (Refer to section 3.1 for instructions on how to obtain your Criminal Background Check Certificate.)
This will redirect you to the FieldPrint scheduling site: https://nmls.fieldprint.com/User/SignIn?ReturnUrl=%2f

1. Create a FieldPrint account by entering your e-mail under “New Users I Sign Up” and click **Sign Up**. (This must be done prior to scheduling an appointment).

   **Note:** This account will be good for the collection of one set of fingerprints that will be deleted/removed after the submission is successful. This step also requires you to provide information previously provided to the NMLS.

2. Complete the personal information section (as shown below) and click **Save and Continue**.

   **NOTE:** You will not enter a “FieldPrint Federal Registration Code.”
3. Enter your work or home address to locate the nearest FieldPrint facility and click **Find**.

4. Select your preferred location.
5. Schedule an appointment by selecting a time and location. Upon completion, you will be provided an appointment confirmation via email. Please read the instructions in the appointment confirmation email which provides additional information on what to bring to your appointment.

6. Attend the scheduled appointment. Please remember to bring the Criminal Background Check Certificate, two forms of identification (refer to appointment confirmation email for details), and the appointment confirmation.

7. After completing the fingerprinting process described under option 1, proceed to section 4.0.

Option 2: If you are located more than 25 miles from a FieldPrint location, you will be given the option of selecting a local police department to process your fingerprints as shown below. Please note that although the website provides you with an option to request a fingerprinting appointment at a local police station, this does not schedule the appointment with the station. Each MLO who selects this option must schedule their own appointment by calling the police station directly.

1. To continue with option 2, please complete steps 1 though 5 as shown above and select your preferred location as one of the local police departments through "Request Appointment."

2. Selecting “Request Appointment” will take you to the following screen which will allow you to enter your appointment preferences.

   Note: As previously noted, FieldPrint will not schedule the appointment for you but you must schedule your own appointment. Following this process allows you to request the hard cards required for fingerprinting at the police station.
3. On the next screen you will provide the mailing address where you would like the hard cards sent.

4. After entering your preferred mailing address for the hard cards, click **Next**. You will be sent to the following payment screen.

**Note:** Per instructions in the expense section (section 1.4), this charge is incurred outside of the NMLS Registry which requires you to pay the cost upfront and then submit the receipt for reimbursement. Similarly, the police station fingerprinting fee, collected at the police station, will also need to be submitted for reimbursement.
5. Enter your credit card information to pay the $10 fee.  
   **Note:** Once you have provided your payment, FieldPrint will automatically mail you the hard cards (this may take up to 5 days) to be taken to the police station and a prepaid return envelope for the fingerprints. Please contact FieldPrint at (877) 614-4361 if you have not received the hard cards after 5 days.

![Credit Card Payment Screen]

6. The following screen print confirmation screen will appear if you have successfully ordered your hard cards.  
   **Important:** You must use the cards provided by FieldPrint to collect your fingerprints at the police station. The NMLS will only accept fingerprints provided on FieldPrint issued cards.

![Screen Print Confirmation]

7. Once you have completed your fingerprinting at a local police station, immediately mail the hard cards to FieldPrint using the prepaid envelope provided.
8. After completing the fingerprinting process described under **option 2**, proceed to section 4.0.

**3.3 Illegible Fingerprints**

Due to various factors, some fingerprints taken by FieldPrint or your local police station may be found to be illegible during the criminal background check process. If you receive an email notifying you that your fingerprints are illegible you will be required to submit new fingerprints. The email will look similar to the email below.
1. Navigate to [https://federal.statemortgageregistry.com/Public/Login.aspx](https://federal.statemortgageregistry.com/Public/Login.aspx).
2. Login to your NMLS Account using your user name and password.

![Login Screen](image1)

3. Click the **Filing** tab on the top right corner of the welcome screen.

![Welcome Screen](image2)

4. Click **MU4R** on the sub-menu at the top of the screen.

![Form Filing Home](image3)
5. Click Create New Filing.

   Note: When you click on ‘Create New Filing’ your information from your previous filing will be pre-populated. You do not have to confirm your information. Outlined below are the steps to scheduling a new fingerprinting appointment.

6. Click Criminal Background Check from the left menu bar.
7. Click the checkbox indicating “I am requesting a Federal Criminal Background Check.”
8. Select Submit New Prints.
9. Click Save.
10. Click Next.

11. On the following screen click Submit Filing.
12. Once the filing is submitted your screen will display a message indicating the filing is processing. Processing may take a few moments. **DO NOT NAVIGATE AWAY FROM THIS PAGE.**
13. Click **Criminal Background Check Certificate**.

Follow the instructions in section 3.1 for obtaining fingerprints through a Livescan location. There are no additional fees associated with submitting a second set of fingerprints.

If you submitted fingerprints via hard cards, you will request a new Criminal Background Check as outlined above. Once you receive the notice (example above) that processing is complete, call FieldPrint at (877) 614-4361 to have your second hard card (stored by FieldPrint) submitted to the FBI. There are no additional fees for submitting the second hard card.

### 4.0 REGISTRY CONFIRMATION

#### 4.1 Successful Completion of MLO Registration

**After** your fingerprints have been processed by FieldPrint, a criminal background check (CBC) will be initiated. The results of the CBC will be forwarded to the NMLS and notification will be sent to Union Bank’s S.A.F.E. Act Program Office for review.

Once the CBC has been reviewed and the S.A.F.E. Act Program Office has determined that the results meet the bank’s CBC requirements, you will receive an email similar to the following:

At this point you are successfully registered and **you may now use your NMLS ID.**
4.2 Unsuccessful Completion of MLO Registration
If Union Bank is unable to confirm your employment due to the results of a background check, you will be contacted by your recruiter for next steps.

5.0 REMOVING INSTITUTION ACCESS
After receiving registry confirmation, MLOs who were previously registered under another institution should remove the prior institution access to their NMLS record.

1. Navigate to https://federal.statemortgageregistry.com/Public/Login.aspx
2. Login to your NMLS Account using your user name and password.
3. Click the Filing tab on the top right corner of the welcome screen.
4. Click Institution Access on the sub-menu at the top of the screen.
4. Click the checkbox next to the institution(s) to be removed.
5. Click Remove.

6.0 **USE of NMLS MLO ID**

As part of complying with the S.A.F.E. Act, your active MLO ID must be provided to the consumer *at initial customer contact and prior to performing the duties of an MLO*. To facilitate compliance with this requirement, you must ensure that the following contains your NMLS MLO ID:

1. Business Cards
2. Email Signature
3. Mortgage Loan Application and/or HELOC Application
4. Personalized business webpage *(if applicable)*
5. Certain Customized Flyers and Documents

Additional guidance related to completing items 1-5 will be provided to you upon completion of your registration process and after your start date with Union Bank.

7.0 **ON-GOING REQUIREMENTS as an MLO**

For the duration of your employment in a MLO position (as defined above) at Union Bank, you are required to complete the following on an on-going basis:

1. Maintain your registration. You are required to maintain your registry in an active status. On an annual basis, you will be required to renew your registration with the NMLS between November 1 and December 31.

2. Update the registry within 30 days if any of following changes occur:
   a. Name Change
   b. Any of the responses to initial registration questions pertaining to criminal background activity become inaccurate
   c. Change in employment at Union Bank (including terminating employment)