Update: 03/20/20 – 04/06/20

State / Agency	Source / Document	Date Published	Expiration Date	Update
Alabama / State Banking Department	Pandemic Planning	VA		 Licensees are encouraged to communicate with impacted consumers regarding deferring fees or other charges. Licensees may relocate offices or have employees work from home. "Licensees should immediately notify the Department of any circumstances that require the closure, relocation, or remote work program and any efforts taken to work with customers." Note, proper notification and communication with consumers is required. The Department plans to maintain normal operations regarding licensure and examination.
	NMLS State Agency Operating Status spreadsheet	03/20/2 0 (effective 03/23/20)		Only essential AL State Banking Department personnel are working
	Agency Homepage	03/31/20		"Procedures for Sending Mail and Email to the Department: To support this organizational change, we have established a central electronic mail account to receive essential correspondence from our financial institutions. If possible, we ask that instead of sending physical mail, send essential correspondence to the email address listed below. Please ensure that all electronic mail that is Confidential Supervisory Information is sent to the Department secured and encrypted. The Department is committed to processing all correspondence in a timely manner. mail@banking.alabama.gov"
Alaska / Department of Commerce,	Agency Homepage			The Department of Commerce, Community, and Economic Development offices in the Atwood Building and the Juneau State Office Building are closed to walk-in traffic but still open for horizon and the Juneau state of the stat
Community, and Economic Development / Division of	Agency Homepage / Alert: Emergency Guidance for Reporting	Effective 03/15/20		for business and can be contacted via phone or email. • Effective March 15, 2020, all due dates for required reporting to the Division of Banking and Securities are extended 45 days to reduce regulatory burden during the COVID-19 outbreak.

State / Agency	Source / Document	Date Published	Expiration Date	Update
Banking and Securities	Corona irus message –			Licensed MLOs may work from home.
	NMLS State Agency Operating Status spreadsheet		04/17/20	 All Department personnel are working remotely "Email dbs@alaska as the most timely method of communication. Industry specific email accounts are noted on the State Licensing Requirements page checklists."
	NMLS COVID-19 Filing Guidance	03/31/20		 The due date for completion of the following reports is extended by 60 days: 2020 Q1 Mortgage Call Report MCR Standard Financial Condition 2019 Q4 MSB Call Report 2020 Q1 MSB Call Report the annual Financial Statement for fiscal years ending Dec. 31, 2019 or later
	Agency homepage	04/03/20	00	The Division published the following special notice for MLOs: "Mortgage Broker-Lenders may require Mortgage Loan Originators (MLOs) to work from home to help prevent the spread of the COVID-19 virus. The Division recognizes that these remote work arrangements are necessary during a state of emergency and will not take administrative or other punitive action against a licensed MLO or the sponsoring licensed company if the MLO conducts activities requiring licensure from home."
Arizona / Department of Financial Institutions	Agency Homepage	03/31/20		The Department is open for business but teleworking, available to assist with services through Arizona's e-licensing system, email, phone, or mail.
Arizona / Office of the Governor Doug Ducey	Executive Order: 2020-14	03/24/20	120 days	Temporary delay of enforcement of eviction action orders for residential premises when one of the following circumstances exist and are documented to the landlord or property owner: a. The individual is required to be quarantined based on their diagnosis of COVID-19. b. The individual is ordered by a licensed medical professional to self-quarantine based on their

State / Agency	Source / Document	Date	Expiration	Update
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	Stay Home, Stay Healthy, Stay Connected (Executive Order: 2020-18)	03/30/20	04/30/20	demonstration of symptoms as defined by the Centers for Disease Control and Prevention. c. The individual is required to be quarantined based on someone in the home being diagnosed with COVID-19. d. The individual demonstrates that they have a health condition, as defined by the Centers for Disease Control and Prevention, that makes them more at risk for COVID-19 than the average person. e. The individual suffered a substantial loss of income resulting from COVID-19, including: i. Job loss; ii. Reduction in compensation; iii. Closure of place of employment; iv. Obligation to be absent from work to care for a home-bound school-age child; or v. Other pertinent circumstances." • This Executive Order orders all Arizona individuals to limit their time away from home with the following exceptions: "a. To conduct or participate in Essential Activities. b. For employment, to volunteer or participate in Essential Functions. c. To utilize any services or products provided by Essential Businesses. d. Employment, if as a sole proprietor or family owned business, work is conducted in a separate office space from your home and the business is not open to serve the public." • The Executive Order also provides that "No person shall be required to provide documentation or proof of their activities justify their activities under this order."
	Executive Order 2020-21 Prohibiting Small Business Evictions	04/06/20	05/31/20	The Executive Order, in part, orders the temporary suspension of a commercial eviction action "or any other attempt to inhibit the operations of a business for tenants unable to pay rent due to financial hardship caused by the COVID-19 pandemic."
Arkansas / Securities	Interim Regulatory Guidance	03/13/30		The Department is currently still at work. However, if required, they will work from home, and business will continue as usual.
Department	NMLS COVID-19 Filing Guidance	04/01/20		 The due date for completion of the following reports is extended by 30 days: the 2020 Q1 Mortgage Call Report; the MCR Standard Financial Condition;

State / Agency	Source / Document	Date Published	Expiration Date	Update
	10:			 the 2019 Q4 MSB Call Report; and the 2020 Q1 MSB Call Report. The due date for completion of the annual Financial Statement for fiscal years ending Dec. 31, 2019 or later is extended by 60 days.
	Interim Regulatory Deadline Guidance	04/01/20		 The guidance responds to the March 27, 2020 change in NMLS reporting deadline policy. The Department is providing the following extensions: Financial statement deadline extension: 60 days Call report deadline extension: 30 days Pursuant to the Governor's March 30, 2020, Executive Order 20-12, all "licensed entities may use real-time audio and visual means to witness the signing of a legal document so long as the identity and physical presence of any and all witnesses and signers in the State of Arkansas are validated at the time of execution of the document by real-time audio or visual means. This authorization will expire at the will of Governor Hutchinson or when the state of emergency is terminated."
	NMLS State Agency Operating Status spreadsheet	04/01/20	06/14/20	 Only essential Department personnel are working "Please send licensing questions to Jay.Drake@arkansas.gov. General inquires can be sent to infoASD@arkansas.gov, Karyn.Tierney@arkansas.gov, or Jay.Drake@arkansas.gov"
California / DBO	Guidance to Escrow Agents, Finance Lenders and Servicers, Student Loan Servicers, Residential Mortgage Lenders and Servicers, and Mortgage Loan Originators	03/21/20		 "The Department will not take enforcement action against licensees for operating unlicensed branches to the extent that, during the state of emergency, employees conduct activities from home that normally would require a branch license, provided that appropriate measures are taken to protect consumers and their data." "The Department will not criticize student loan servicers or licensees sponsoring mortgage loan originators who permit their respective employees to work from home, provided that: 1. The employee does not keep any physical business records at home or anywhere other than the licensed location; 2. The

employee does not meet with any customers at home; 3. The licensee has a procedure in place to supervise employees as required by law; 4. The employee uses only computers and devices that are encrypted and accesses the licensee's network using a virtual private network that is encrypted; and, 5. The licensee and employee take all other necessary measures to protect consumer data privacy. The above also applies to Escrow Law licensees; however, they should be aware that the Department cannot modify any restrictions that may be imposed by the Fidelity Corporation or the licensee's surety bond." • "The Commissioner recommends that licensees: • Offer payment accommodations, such as allowing borrowers to defer or skip some payments or extend the payment due date, which would avoid delinquencies and negative credit bureau reporting caused by COVID-19-related disruptions. Mortgage lenders may also ease terms for new loans to affected borrowers, consistent with prudent banking practices, and consult Federal Housing Administration guidance on loss mitigation options. Prudent efforts to modify the terms on existing loans for affected customers will not be subject to	State / Agency	Source / Document	Date	Expiration	Update
licensee has a procedure in place to supervise employees as required by law; 4. The employee uses only computers and devices that are encrypted and accesses the licensee's network using a virtual private network that is encrypted; and, 5. The licensee and employee take all other necessary measures to protect consumer data privacy. The above also applies to Escrow Law licensees; however, they should be aware that the Department cannot modify any restrictions that may be imposed by the Fidelity Corporation or the licensee's surety bond." "The Commissioner recommends that licensees: Offer payment accommodations, such as allowing borrowers to defer or skip some payments or extend the payment due date, which would avoid delinquencies and negative credit bureau reporting caused by COVID-19-related disruptions. Mortgage lenders may also ease terms for new loans to affected borrowers, consistent with prudent banking practices, and consult Federal Housing Administration guidance on loss mitigation options. Prudent efforts to modify the terms on existing I hans for affected customers will not be subject to			Published	Date	
 Exercise discretion in determining which of their services and transactions are "essential services" for the purposes of "stay-in-place" or "shelter-in-place" orders. Report to the Department any disruption of services provided to consumers." "The Department will not criticize any late mortgage 					licensee has a procedure in place to supervise employees as required by law; 4. The employee uses only computers and devices that are encrypted and accesses the licensee's network using a virtual private network that is encrypted; and, 5. The licensee and employee take all other necessary measures to protect consumer data privacy. The above also applies to Escrow Law licensees; however, they should be aware that the Department cannot modify any restrictions that may be imposed by the Fidelity Corporation or the licensee's surety bond." • "The Commissioner recommends that licensees: • Offer payment accommodations, such as allowing borrowers to defer or skip some payments or extend the payment due date, which would avoid delinquencies and negative credit bureau reporting caused by COVID-19-related disruptions. Mortgage lenders may also ease terms for new loans to affected borrowers, consistent with prudent banking practices, and consult Federal Housing Administration guidance on loss mitigation options. Prudent efforts to modify the terms on existing loans for affected customers will not be subject to examiner criticism by the Department. • Exercise discretion in determining which of their services and transactions are "essential services" for the purposes of "stay-in-place" or "shelter-in-place" orders. • Report to the Department any disruption of services provided to consumers."
<u>CA DBO COVID-19</u> 03/25/20 ■ The guidance announces that the following relief is provided by committed financial institutions, including:			03/25/20		guarant and an

State / Agency	Source / Document	Date	Expiration	Update
		Published	Date	
	Guidance to Broker- Dealers and Investment Advisers (BDIA) During	03/30/20		 90-day grace period for all mortgage payments – including: Providing a streamlined process for requesting forbearance for COVID-19-related reasons, supported with available documentation; Confirmation of approval of and terms of forbearance program; and Opportunities to extend a forbearance agreement if the consumer continues to experience hardship due to COVID-19; Relief from fees and charges for 90 days; No new foreclosures for 60 days; and No credit score changes for accessing relief. The guidance also includes new FAQs on financial relief for consumers. The guidance is addressed to broker-dealers and investment advisers licensed under the Corporate Securities Law of 1968. The guidance extends the following filing due dates by 45 days:
	Advisers (BDIA) During the COVID-19 Pandemic (PDF) NMLS COVID-19 Filing	Last updated		 The guidance extends the following filing due dates by 45 days: Notice of Changes by Broker-Dealers and Investment Advisers, Form PF for private fund advisers, Annual Report, and Interim Report. The guidance allows licensees to electronically file Form U4 without a manual signature provided certain conditions are met. The due date for completion of the following reports is extended
	Guidance	04/02/20		 by 30 days: the 2020 Q1 Mortgage Call Report; the MCR Standard Financial Condition; and the annual Financial Statement for fiscal years ending Dec. 31, 2019 or later. "The DBO CRMLA will allow 30 day extensions only if requested by licensees."

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California / Department of Real Estate (DRE)	COVID-19 FAQs for Licensing Processes and Business Practices	03/25/20		 In response to the Governor's shelter-in-place order (Executive Order N-33-20, issued March 19, 2020), all DRE offices are closed until further notice. DRE is operational by phone (the DRE public information line will remain open), online, mail (list of addresses), and email. Online access includes access to the eLicensing system (to reschedule exams and renew real estate license) and the online complaint system (to file consumer complaints). eLicensing cannot be used by: (1) officers renewing expired licenses and (2) all restricted licensees; these renewal applications must be submitted via mail. All licensing exams are cancelled from March 18, 2020 to April 7, 2020. Canceled exams can be rescheduled for free using the eLicensing system. Continuing education requirements may be completed, for example, online or by mail. DRE is not, at this time, considering extending expiration dates/deadlines for licensees or waiving fees for late license renewals. The shelter-in-place order may affect individual live scan service providers. The status of each location will need to be checked individually. During this time, DRE will accept electronic signatures on licensing documents, but documents with electronic signatures still must be mailed to DRE if it cannot be completed using eLicensing,
	Alert – Canceled Exams through 4/30/20	3/27/20	4/30/20	 The DRE is cancelling real estate salesperson and broker license exams in all exam centers through April 30, 2020. Examinees affected by these cancellations will be notified by email and will be allowed to reschedule their canceled exam dates using DRE's eLicensing system. Exam rescheduling fees will be waived for canceled exams.

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Colorado / Department of Regulatory Agencies	Division Advisory			"An MLO is able to perform their mortgage related activities at a location other than at their registered license location."
Connecticut / Department of Banking	Homepage			 "The Department of Banking has closed its offices to the public. However, agency staff will continue to provide services to consumers and industry through telework." Electronic communication should be used to contact the Department, but agency staff will continue to check voicemails.
	NMLS State Agency Operating Status spreadsheet	03/17/20	04/17/20	 All Department personnel is working remotely. All questions should be sent to the following email: dob.ccl@ct.gov.
	Mortgage Servicer Guidance	03/18/20		 The guidance encourages mortgage servicers "to work with all borrowers (particularly individuals associated with industries more susceptible to volatility) whose ability to make loan repayments at this time may be impacted by COVID-19." Efforts include, for example, "waiving late fees, offering forbearance plans or other deferment options and having adequate staff available to proactively work with borrowers facing hardship as a result of the COVID-19 outbreak."
	Mortgage Relief During COVID-19 Pandemic	03/31/20		 Governor Lamont reached an agreement with Connecticut credit unions and banks to provide residential mortgage relief to alleviate hardship caused by the COVID-19 crisis. The following relief policies are offered by the participants under the agreement: 90-day grace period for all mortgage payments; Relief from fees and charges for 90 days; No new foreclosures for 60 days; and No credit score changes for accessing relief.
	Extended Deadlines for Call Reports and Financial Statement Filings for	04/02/20		The Department of Banking will take a no action position on the original filing deadlines for call reports and financial statement filings in an effort to provide flexibility with administrative burdens.

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	Consumer Credit Licensees			 MSB Q4 2019: extended from 3/31/20 to 4/30/20 MCR Q1 2020: extended from 5/15/20 to 6/14/20 MSB Q1 2020: extended from 5/15/20 to 6/14/20 MCR Standard Financial Condition: extended from 90 days from end of the company's fiscal year to 120 days from the end of the company's fiscal year Financial Statement: extended from 90 days from end of the company's fiscal year to 120 days from the end of the company's fiscal year.
	NMLS COVID-19 Filing Guidance	04/02/20		 The due date for completion of the following reports is extended by 30 days: the 2020 Q1 Mortgage Call Report; the MCR Standard Financial Condition; the 2019 Q4 MSB Call Report; the 2020 Q1 MSB Call Report; and the annual Financial Statement for fiscal years ending Dec. 31, 2019 or later; "Based on a recommendation from the NMLS Policy Committee, the CT Department of Banking will not take action if Call Reports and Annual Financial Statements are filed within 30 days of the placement of the License Item in NMLS. Please review the chart available on NMLS for the specific dates these items are due."
Delaware / Office of the State Bank Commissioner	Informal regulator guidance			The Delaware Office of the State Bank Commissioner are still working at the office and processing of applications has not changed.
DC / Department of Insurance, Securities and Banking	Agency homepage			The DC Department of Insurance, Securities, and Banking "is currently conducting business via telework and will not be able to address consumer issues in person."
DC / Office of Mayor Muriel Bowser	Stay Home DC	03/30/20 (effective 04/01/20)		Mayor Bowser issued a stay-at-home order for DC, reinforcing the Mayor's previous direction to forgo all non-essential activities and stay home.

State / Agency	Source / Document	Date	Expiration	Update
Georgia / Department of Banking and Finance	Informal regulator guidance NMLS State Agency Operating Status spreadsheet NMLS COVID-19 Filing Guidance Agency homepage	03/13/20 04/02/20 04/03/20	Date	 "The Mayor's Order specifies that residents may only leave their residences to: engage in essential activities, including obtaining medical care that cannot be provided through telehealth and obtaining food and essential household goods; perform or access essential governmental functions; work at essential businesses; engage in essential travel; or engage in allowable recreational activities, as defined by the Mayor's Order." Penalties for willful violation of the order include a fine up to \$5,000 and/or imprisonment for up to 90 days. Georgia Department of Banking and Finance Examiners are working remotely. They still have the ability to process applications on a normal basis and do not anticipate any delays. There is limited staff in the Department's main office, and other personnel are working remotely. The Department "does not intend on taking administrative action or issuing a fine for reports filed within the 30 days." "[T]he Department is implementing electronic document submission for correspondence. Regular and ongoing
Hawaii / Division of Financial Institutions / Department of Commerce and Consumer Affairs	Agency homepage Interim Regulatory Guidance – Reduction in Branch Office Hours	03/17/20	06/30/20	correspondence should be submitted to the designated Department recipient through email." "Due to COVID-19 and for the health and safety of consumers, the Department of Commerce and Consumer Affairs offices will be closed to the public through Thursday, April 30th or until further notice. During this period of office closure, no walk-in services will be available and the public is strongly encouraged to use our online services." The guidance states the intent of the Hawaii Division of Financial Institutions (DFI) is "to temporarily allow Companies licensed by DFI with physical locations in the State of Hawaii to reduce office hours or temporarily close offices during this Emergency Period."

State / Agency	Source / Document	Date	Expiration	Update
		Published	Date	 Pursuant to statutory authority, financial institutions may "temporarily close or relocate a branch or agency office in the event of an emergency or for other good cause." The guidance states that in the event of temporary closure or relocation, notice must be provided to the Commissioner and to the institution's customers. The guidance also recognizes a reduction in branch hours as a temporary closure. The guidance reiterates that because Hawaii statutes do "not restrict a licensed MLO from working at locations necessary to conduct lawful business," this practice may continue, provided that the location is not held out as a branch office of the mortgage loan originator company. If a branch of a mortgage loan company "will not be opened during normal business hours, the Branch Manager must post signage at the branch office indicating the temporary closure of the branch and a method by which a consumer may contact the Branch Manager." DFI requests a courtesy notification be made to DFI if a branch will be temporarily closed (including a branch reducing its normal business hours). The guidance also addresses escrow depository and money transmitters.
	NMLS State Agency Operating Status spreadsheet	03/20/20	04/03/20	The Department has stated that email is the best and preferred method of contact.
	NMLS COVID-19 Filing Guidance	03/31/20		 The due date for completion of the following reports is extended by 30 days: the 2020 Q1 Mortgage Call Report; the MCR Standard Financial Condition; and the annual Financial Statement for fiscal years ending Dec. 31, 2019 or later.
	Temporary Regulatory Guidance Regarding	03/12/20	06/30/20	Licensees, registrants, and their employees may work from home, provided that licensable activities conducted from the

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Idaho / Department of Finance	Working from Home Due to Coronavirus/COVID-19 Concerts or Quarantines			residence meet certain requirements: 1. Data security requirements include provisions for the employee to access the company's secure origination system from any out-of-office device the MLO uses through the use of a VPN or other system that requires passwords or an identification authentication. The company is responsible to maintain any updates or other requirements in order to keep information and devices secure; 2. Neither the employee nor the company is to do any act that would indicate or tend to indicate that the employee is conducting business from an unlicensed location. Such acts include but are not limited to: a. Advertising in any form, including business cards and social media, the unlicensed residence address or landline telephone or facsimile number associated to the unlicensed residence; b. Meeting consumers at, or having consumers come, to an employee's unlicensed residence; c. Holding out in any manner, directly or indirectly, by the employee or company licensee, the residence address that would suggest or convey to a consumer that the residence is a licensed location for conducting licensable activities; [and] 3. Employees and companies must exercise due diligence in the safeguarding of company and customer data, information and records, whether in paper or electronic format, and to protect them against unauthorized or accidental access, use, modification, duplication, destruction or disclosure."
	NMLS State Agency Operating Status spreadsheet	03/25/20		• "The Idaho Department of Finance is closed to the public and only limited essential personnel are in the office. Employees are telecommuting and communicating via email. Idaho's responses are in keeping with Governor Little's statewide stay-home order and CDC guidelines, and is subject to change as the situation requires. Licensees and others are encouraged to use email rather than phone for quicker response as not all employees have phone access."

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	Undate on Agency Operations and Communication Due to COVID-13 Developments NMLS State Agency	03/26/20		 "The offices of the Idaho Department of Finance remain open, but closed to the public for the next 21 days and most of the staff are teleworking from home." Communication with the Consumer Finance Bureau should be via email. "All staff will be responding to email throughout the day every business day as they can, and in the order received, during this telework period." "Licensing staff are continuing to process licensing/registration applications through the NMLS and the 'paper' system. Delays in 'paper' applications and follow-up may occur due to limited access. Companies may choose this time to transition their license records to the NMLS. Requests for supplemental information may be submitted via email. " "Field examiner staff are conducting streamlined, remote examinations using phone and email correspondence in lieu of traditional on-site examinations." The Department has extended the following deadlines" MCR Q1 2020: extended from May 15, 2020 to July 14, 2020. MCR Standard Financial Condition: extended from 90 days from end of company's fiscal year to 150 days from the end of the company's fiscal year. Financial Statement deadlines – extended 60 days from end of the company's fiscal year to 150 days from end of company's fiscal year to 150 days from end of the company's fiscal year. Licensees and others are encouraged to use email rather than
	Operating Status	03/26/20		Licensees and others are encouraged to use email rather than phone for quicker response as not all employees have phone
	spreadsheet			access.
Illinois /	Jesse White Allows	03/27/20		Temporarily, Illinois notaries may perform remote, online
Department of	Notaries to Perform Duties			notarizations during the COVID-19 pandemic.

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Financial and	Remotely Due to COVID-			
Professional	19 randemic			
Regulation	IL Arabances Help for Consumer Struggling to Make Payments on their Debts Due to the CSVID- 19 Crisis and Guidance for its Regulated Financia. Sectors	03/30/20		 The Illinois Department of Financial and Professional Regulation "announced a series of actions to ensure the protection of Illinoisans in many areas of consumer borrowing, servicing, and collections," in addition to providing "Guidance to its regulated entities, state banks, credit unions, installment lenders, payday lenders, title loan lenders, sales finance lenders including auto loans, currency exchanges, student loan servicers, mortgage servicers, and collection agencies concerning their lending, servicing, and collection during the COVID-19 pandemic." With regard to state banks and credit unions, the guidance urges banks and credit unions to assist affected borrowers, specifically encouraging the following actions and reminding these institutions that prudent efforts to offer assistance will not be subject to examiner criticism: Offering payment accommodations (e.g., payment deferment at no cost, extended payment due dates); New loans on favorable terms; Fee waivers (e.g., ATM usage fees, overdraft fees, and late fees); Increasing ATM daily cash withdrawal limits; Easing restrictions on cashing out-of-state and non-customer checks; Increasing credit card limits; Alerting customers to scams and price gouging risks during the COVID19 disruptions; Sending reminders to customers to contact their financial institutions before entering into unsolicited financial assistance programs;

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	Guidance to Mortgage Servicers & Exempt Mortgage Servicers Urging Support for Borrowers Impacted by COVID-19		Date	 Preventing service disruptions to consumers and small businesses in the event the financial institutions' offices close; Contact customers via app announcements, text, email, or otherwise to explain the above-listed assistance being offered; and Using capital and liquidity buffers to take other supportive action. With regard to mortgage servicers, the guidance reiterates actions that have already been taken, in addition to encouraging consumers to contact their landlord and mortgage servicer for relief programs. The guidance also addresses student loan servicing, debt collection, and credit history protection. The guidance urges mortgage servicers to take action, including the following: "Forbearing mortgage payments for at least 90 days without incurring additional interest or fees; Refraining from reporting late payments to credit rating agencies, and when payments are deferred or modified, coding those payments as deferred with the applicable disaster code;" Offering mortgage borrowers an additional 90-day grace period to complete trial loan modifications, and ensuring that late payments during the COVID-19 pandemic do not a ffect their ability to obtain permanent loan modifications, Offering other loss mitigation options to mortgage borrowers, including those that help borrowers stay in their homes at affordable payments; Waiving late payment rees and online payment fees for a period of at least 90 days and, for mortgage borrowers in a forbearance plan, during the period of forbearance;

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				 Postponing foreclosures and evictions for at least 90 days; and Contacting mortgage borrowers on automatic payment plans to see if they need to temporarily suspend those payments and, if so, grant any such requests without delay and place the mortgage borrower in a forbearance program as discussed above." The guidance also encourages services to take the make the following efforts: "Ensuring borrowers do not experience a disruption of service if the mortgage servicer reduces staffing or closes an office, including making available other avenues for borrowers to continue to manage their accounts and to make inquiries; and Contacting borrowers via app announcements, text, email or other effective means to explain the assistance being offered to them." The guidance also reminds institutions that "prudent actions taken during this period will be considered to be consistent with safe and sounding banking practices and will not be subject to examiner criticism" but the Department will "carefully review mortgage servicing activity during this sensitive time for failures to implement federal assistance programs and for any applicable violations of consumer protection law."
	Guidance to Student Loan Servicers Regarding Federal Student Loan Interest Waivers and Administrative	03/30/20		 The guidance encourages Illinois-licensed student loan servicers to: "make prudent efforts to meet the financial needs of all student loan borrowers affected directly or indirectly by the COVID-19 pandemic"; "navigate their choices regarding their loans in these new and difficult circumstances"; and "use the disaster status code in conjunction with a deferment when reporting to the consumer credit

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	Consumer Credit Licensee Notice	03/30/20		reporting agencies to minimize any negative credit reporting impact to consumers due to the COVID-19 crisis." • The guidance also reminds Illinois-licensed student loan servicers that they are obligated to avoid any unfair or deceptive practices; not misapply the borrowers' payments; and "lay out" the options available to borrowers (e.g., income-based repayment, deferment, forbearance, relief from interest). • "Effective immediately, the Illinois Department of Financial and Professional Regulation (Department) examiners and office personnel will be working remotely. All employees have access to their email and voicemail and will help answer any questions during normal working hours. If you need to speak with an examiner or anyone from the Department's Consumer Credit Section, please leave a voicemail and your phone call will be returned as soon as possible. If an examination was in process, or was scheduled to begin shortly, your examiner will be in contact."
Indiana /	Supplement to Guidance to Illinois-Licensed Debt Collection Agencies and Debt Buyers Regarding COVID-19	04/03/20		The guidance instructs collection agencies whose individual agents are working remotely and whose physical location are not changed to email the Department with the employee name and location. The guidance reiterates that the Indiana Department of
Department of Financial Institutions	COVID-19 Related Guidance for Indiana DFI-licensed Mortgage Lenders and Mortgage Loan Originators (MLOs) Regarding Work from Home	03/20/20		 The guidance reiterates that the Indiana Department of Financial Institutions (DFI) does not license mortgage branch locations, and therefore does not have rules / requirements / guidance / restrictions on work location. Regarding licensed MLOs who engage only in brokering activity, the guidance defers to the Indiana Secretary of State for guidance.
	Informal regulator guidance			DFI continues to process applications and are doing their best to operate as normal as possible.

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	NMLS State Agency Operating Status spreadsheet	03/23/20		The DFI's preferred method of communication is email.
	NMLS COVID-19 Filing Guidance	04/01/20		 The due date for completion of the following reports is extended by 60 days: the 2020 Q1 Mortgage Call Report; and the MCR Standard Financial Condition; the 2019 Q4 MSB Call Report; and the 2020 Q1 MSB Call Report. the annual Financial Statement for fiscal years ending Dec. 31, 2019 or later. Despite the extended deadlines, the DFI is encouraging licensees to submit reports once ready for submission. Licensees may request additional time to file the reports in addition to the extensions already provided by submitting the request via email. Requests will be considered on a case-by-case basis.
Indiana / Secretary of State	NMLS State Agency Operating Status spreadsheet	03/17/20		 All Indiana Secretary of State personnel are working remotely. For all COVID-19 related questions, please contact Daniel Spungen (dspungen@sos.in.gov).
	NMLS COVID-19 Filing Guidance	04/01/20		 The due date for completion of the following reports is extended by 30 days: the 2020 Q1 Mortgage Call Report; the MCR Standard Financial Condition; and the annual Financial Statement for fiscal years ending Dec. 31, 2019 or later.
Iowa / Division of Banking	Guidance re: Regulatory Guidance for Working from Residence or Other Company Designated Location	03/18/20		 Most of the lowa Division of Banking's (IDOB) employees are working remotely, and the IDOB is encouraging licensees and registrants to do the same. The guidance "expresses the intent of the IDOB to allow licensees and registrants, including licensed or registered mortgage loan originators, and their employees to work remotely from their residence or another location designated by

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				the employer during the COVID-19 pandemic, even if the residence or designated location is not a licensed or registered location." This change is effective immediately and until further notice. • The IDOB also included the following list of best practices for remote workers: • "Computers and devices that leave a licensee's authorized location(s) should include at-rest encryption. • If paper records containing confidential information are taken off the premises of a licensee's authorized location(s), procedures must be established to secure that information at the offsite location. • Connections to the licensee's authorized location(s) or sensitive systems via any out-of-office device (e.g., laptop, desktop, phone, tablet) should be encrypted in transit by use of a virtual private network (VPN) or similar technology that requires a password or other form of authentication. • Activity should be conducted in a private home environment, avoiding public areas such as coffee shops or libraries."
	NMLS COVID-19 Filing Guidance	03/31/20		 The due date for completion of the following reports is extended by 30 days: the 2020 Q1 Mortgage Call Report; the MCR Standard Financial Condition; the 2019 Q4 MSB Call Report; the 2020 Q1 MSB Call Report; and the annual Financial Statement for fiscal years ending Dec. 31, 2019 or later.
Kansas / Office of Governor Kelly	Executive Order No. 20-10	3/23/20	5/1/20	The original Executive Order, issued on March 17, 2020, directed and ordered all financial institutions operating in Kansas to temporarily suspend the initiation of any mortgage foreclosure

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				efforts or judicial proceedings and any commercial or residential eviction efforts or judicial proceedings. The updated Executive Order includes the following paragraphs: "4. No bank or financial lending entity operating in Kansas shall foreclose on a residential property in Kansas when all defaults or violations of the mortgage are substantially caused by a financial hardship resulting from the COVID-19 pandemic. a. The provisions of paragraph 3 and paragraph 6 do not apply to foreclosures on multi-family residential properties in which residential tenants rent from a landlord, as long as the foreclosure will not result in the eviction of any tenants." "5. No landlords-whether individuals, companies, banks, financial lending entities, nursing homes, long-term care facilities, or other entities-shall evict a residential tenant when all defaults or violations of the rental agreement are substantially caused by a financial hardship resulting from the COVID-19 pandemic." "6. Any bank, financial lending entity, or landlord initiating judicial foreclosure or judicial eviction proceedings after the effective date of this order shall have the burden of pleading and proving that the toreclosure or eviction proceeding is not being initiated solely because of defaults or violations of mortgages or rental agreements substantially caused by a financial hardship resulting from the COVID-19 pandemic." "7. This order does not relieve mortgage borrowers or tenants who have not suffered a financial hardship resulting from the COVID-19 pandemic from the bility of the COVID-19 pandemic from the burden of the covid-19 pand
				obligation to comply with mortgage or rental

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Kansas / Office of the State Bank Commissioner	Remotely Working			agreements or to continue making required mortgage or rent payments." "8. This order does not prevent foreclosures or evictions for mortgage or rental agreement defaults or violations not due to a financial hardship resulting from the COVID-19 pandemic." "9. After the statewide State of Disaster Emergency proclaimed on March 12, 2020, relating to COVID-19 expires and financial hardships resulting from the COVID-19 pandemic abate, borrowers, lenders, renters, and landlords are encouraged to negotiate payment plans or other agreements to allow borrowers or renters to address any defaults, missed payments, or late fees substantially caused by a financial hardship resulting from the COVID-19 pandemic." "Licensees (including MLOs), registrants, and their employees are allowed to work remotely from their residence or a company designated location," provided that prospective or existing borrowers do not travel to an MLO's residence to conduct business. All companies must have temporary policies, procedures, and a plan for supervision in place. The Kansas Office of the State Bank Commissioner provides the following best practices for remote work: "Computers and devices that leave the office should include at-rest encryption. Paper records should not be taken off-site if they contain confidential information. Connectivity to the main office or sensitive systems should be encrypted in transit by use of a virtual private network (VPN) or similar technology."
	KS Executive Order No. 20-06 – Prohibiting Foreclosures	03/17/20	05/01/20	 All financial institutions operating in Kansas must temporarily suspend the initiation of any mortgage foreclosure efforts or

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Kentucky / Department of Financial Institutions				judicial proceedings and any commercial or residential eviction efforts or judicial proceedings until May 1, 2020. The guidance makes the following 5 recommendations for Kentucky-charted financial institutions: Follow common-sense safety precautions; Encourage customers to use mobile apps and online banking; Work with customers affected by COVID-19 to meet their financial needs (e.g., waiving overdraft and/or minimum balance fees, restructure existing loans, extend loan repayment terms, ease terms for new loans); The Kentucky / Department of Financial Institutions has indicated that they will, for regulatory purposes, note actions that financial institutions take to help affected customers. Manage COVID-19 related staffing issues (note, banks and credit unions making significant alterations to inperson operations should notify the Director of the Division of Depository Institutions); and Make sure business continuity plans include pandemic planning.
Louisiana / Office of Financial Institutions	Emergency Declaration for Residential Mortgage Lenders / Brokers / Originators	03/18/20	04/09/20	 Licensees are authorized to temporarily close licensed locations or to "temporarily close and/or relocate some or all of the operations, services, and products of a closed location to another location or locations" within Louisiana. MLOs may "work from home, whether located in State of Louisiana or another state, even if the home is not registered with this office." "Any licensee whose business is materially affected or interrupted should contact the Office of Financial Institutions as soon as possible with information regarding your temporary relocation."

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Maine / Bureau of Consumer Credit Protection	Agencyhomepage			• "Due to the ongoing COVID-19 health emergency, the offices of the Bureau of Consumer Credit Protection are currently closed to the public. Contact us at (207) 624-8527, and leave a message if necessary – staff-members are monitoring all messages and returning all calls."
Massachusetts / Division of Banks	Reminder to Incensions	03/11/20		• Licensees are allowed "to work from home, provided the arrangement is feasible for their business model and license type, that it is not advertised as an office, and that the licensee does not meet consumers at their home."
	Reminder to Mortgage Lenders & Funding Sources	03/12/20		The reminder is to lenders to encourage them to engage their funding partners to ensure lines of credit remain accessible and adequate to meet current and anticipated funding needs.
	NMLS State Agency Operating Status spreadsheet	03/16/20		 All Massachusetts Division of Banks (DOB) personnel are working remotely. "Email is the preferred method of communication. Telephone calls/messages will be responded to as normal."
	Notification Protocol	03/19/20	S	• The guidance allows licensees to temporarily close a facility due to staffing challenges or as a precautionary measure. Licensees should notify: (1) customers of temporary closures and the availability of alternative service options (if any); and (2) the DOB of any location closures, business disruptions, or other significant developments related to COVID-19 (e.g., office closures, significant staff shortages, liquidity shortages, distress with funding sources, issues funding closed loans).
	Response to Governor's Emergency Order	03/23/20		• In response to the Governor's emergency order requiring closure of all businesses and organizations not providing "COVID-19 Essential Services," the DOB considers all entities charted and licensed by the Division covered by the essential services list and, therefore, exempt from the Governor's order.
	Reporting Deadline Changes for Massachusetts Licensees and Registrants	03/26/20		The Division has agreed to follow the policy as proposed by the NMLS Policy Committee to provide a 60 day extension to all Licensees to submit Call Reports and financial statements.

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	Message to Massachusetts Licensees and Registrants on Deadlines			 Additionally the Division is temporarily instituting a policy to extend the Annual Report deadline by 60 days for regulated entities that cannot meet the original deadlines due to COVID-19. Debt Collector 2019: extended from March 31, 2020 to May 30, 2020 Check Casher 2019: extended from March 31, 2020 to May 30, 2020 Finance Company 2019: extended from March 31, 2020 to May 30, 2020 Foreign Transmittal Agency 2019: extended from March 31, 2020 to May 30, 2020 Loan Servicer 2019: extended from March 31, 2020 to May 30, 2020 "On March 18, 2020, Prometric testing sites were closed for a period of at least 30 days to mitigate the spread of Coronavirus/COVID-19." The Division extending the following deadlines: Financial statement deadline - from 90 days from end of the company's fiscal year. Note, the Division is maintaining this 60-day extension, despite the current NMLS policy decision implementing the financial statement deadline's 30-day extension. Call report deadlines: MSB Q4 - from March 21, 2020 to April 30, 2020 MCR O1 - from May 15, 2020 to June 14, 2020 MCR Standard Financial Condition - from 90 days from the end of the company's fiscal year.

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				 Note, the Division is following the new NMLS policy to provide a 30-day extension for all licensees. Annual report deadlines. The following reports are extended from March 31, 2020 to May 30, 3030: Debt Collector 2019 report, Check Casher 2019 report, Finance Company 2019 report, Foreign Transmittal Agency 2019 report, Loan Servicer 2019 report. The 60-day extension is available for regulated entities that cannot meet the original March 31, 2020 deadline as a result of the COVID-19 emergency.
	NMLS COVID-19 Filing Guidance	03/31/20		 The due date for completion of the following reports is extended by 30 days: the 2020 Q1 Mortgage Call Report; the MCR Standard Financial Condition; the 2019 Q4 MSB Call Report; and the 2020 Q1 MSB Call Report. The due date for completion of the annual Financial Statement for fiscal years ending Dec. 31, 2019 or later is extended by 60 days.
	DOB Industry Guidance Re: SBA's Paycheck Protection Program and Legal Lending Limits	04/06/20		 The supervisory guidance responds to the U.S. Small Business Administration's new Paycheck Protection Program (PPP), authorized under the Coronavirus Aid, Relief, and Economic Security Act. The Massachusetts DOB concluded that "loans made specifically under the PPP will not be considered as the basis for an adverse regulatory finding or enforcement action for violation of the legal lending limit. Similarly, to the extent that such a PPP loan would cause the institution to exceed the lending limit established by its own internal policy, which may be an amount less than the legal lending limit established by the Massachusetts law, such exception to exceed the maximum borrowing amount would not be criticized in the findings of an

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M 1 1/06		00/10/00		 examination as a variation from the institution's lending policy." Additionally, the DOB emphasized that "this supervisory exception to the legal lending limit is being granted specifically for, and only to the extent of, the PPP loan amount."
Maryland / Office of the Commissioner of Financial Regulation	COVID-19 British for MD Mortgage Brokers, Lenders and Servicers	03/13/30		 Pursuant to the Code of Maryland Regulations, MLOs may work from home, or another unlicensed location, if it is necessary for the office to close due to an emergency, provided that neither the MLO nor the MLO's employer engages in any of the following: (1) Owns or leases the location for the purpose of conducting mortgage lending business; (2) Indicates or suggests by use of signage that the mortgage loan originator or the mortgage loan originator's employer utilizes the location for taking mortgage loan applications or offering or negotiating terms of mortgage loans; (3) Advertises that the mortgage loan originator or the mortgage loan originator's employer takes mortgage loan applications or offers or negotiates terms of mortgage loans at the location; (4) Maintains work space, telephone service, or internet service at the location in the name of the mortgage loan originator or the mortgage loan originator's employer for the purpose of conducting mortgage lending business; (5) Receives mail relating to the mortgage lending business at the location; or (6) Stores books or records relating to the mortgage lending business at the location; The Maryland Office of the Commissioner of Financial Regulation (OCFR) intends to continue the required periodic exams of all mortgage lender licensees but has stated they are willing to be flexible on timelines involving examinations or other licensing or supervisory activity required under Maryland law. The OCFR has stated that their preferred method of communication is email (either to Christine Brooks for

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	И.			examination concerns or Arlene Williams for licensing concerns).
	Forester of Residential Property Lay d	03/19/20		The Maryland Court of Appeals issued an administrative order immediately staying all foreclosures of residential properties in Maryland.
	Guidance to Mortgage Servicers	03/24/20		The Commissioner "strongly urges" licensed mortgage servicers to immediately mitigate the COVID-19's impact on customers, by, "at a minimum," taking reasonable steps to attempt to offer assistance to all Maryland borrowers who have experienced impacts affecting their ability to pay mortgages (e.g., loss of income). "Reasonable steps" to immediately take include: "1. Waiving late fees as well as online and telephone payment fee; 2. Forgoing the reporting of payment information during the health emergency or reporting payment information to credit reporting agencies in a manner that minimizes the impact of delinquent payment on a borrowers' credit histories; 3. Offering forbearance or other options, when permitted under investor guidelines, to allow borrowers to defer payments (such deferral programs should take into account the ability of the borrower to meet payment obligations when the forbearance period ends with a goal towards preserving homeownership – such as extending the loan term to accommodate the missed payments) 4. Extending trial modification periods and ensuring that late payments resulting from COVID-19-related interruptions to income do not prevent borrowers from obtaining permanent modifications; 5. Taking steps to ensure that borrowers are able to timely make inquires and manage their accounts, and, if there is a reduction in the servicer's staff, ensuring that borrowers are provided with alternatives for managing

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	Executive Order Authorizes Remote	03/31/20	Batt	accounts, making inquiries, and making payments; 6. Reaching out to borrowers proactively to provide information on available assistance; 7. Ensuring that all borrower-facing staff are fully informed regarding any assistance available and are proactive in informing borrowers of such." • The advisory reports Governor Hogan's March 30, 2020 executive order permitting remote notarization, "if the notary and the party where signs to be in a patrice of account in the contraction of the c
Michigan / Office	Notarization: Mortga re Lenders Encouraged to Implement Remote Closings Executive Order 2020-21	03/24/20	4/13/20	 and the party whose signature is being notarized communicate with each other simultaneously by sight and sound through a communication technology, and the notary is able to view satisfactory evidence of the party's identity." The advisory urges mortgage lenders to use remote notarization to close loans. The Executive Order imposes a temporary requirement to
of Governor Gretchen Whitmer	Executive Order 2020 21	00/24/20	0	suspend activities that are not necessary to sustain or protect life
Michigan / Department of Insurance and Financial Services / Office of Consumer Finance	Frequently Asked Questions for Consumer Finance Licensees and Registrants	rev. 03/24/20		 The Michigan Office of Consumer Finance (OCF) continues its 2020 examinations but has moved towards off-site examinations during the COVID-19 pandemic. "OCF is adjusting our internal operations as needed, to ensure uninterrupted availability to you and uninterrupted processing of examinations and licensing activities. Applications will continue to be processed, calls answered, examinations performed, and we will work to keep you informed of any changes. As of March 16, 2020, only off-site examination functions are being performed, with critical reviews which cannot be performed offsite being postponed to a later date. Conditions will continue to be monitored in order to determine when on-site examination functions may resume. Rescheduling of full examinations is occurring on a case-by-case basis, with accommodations being made wherever possible and prudent."

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		Rev. 04/02/20		 "OCF encourages licensees to work with affected consumers in addressing the impact and challenges resulting from COVID-19. Strategies to consider may include: Waiving or reducing late fees. Offering payment accommodations where appropriate. Adjusting or modifying terms on existing loans where possible and appropriate." OCF clarified, in their revised Consumer Finance Industry FAQs, that licensees under an OCF-administered statute do not need to temporarily suspend activities pursuant to the Governor's Executive Order 2020-21 which required "suspension for activities not necessary to sustain or protect life." Specifically, the OCF added: "Licensees and registrants under the Mortgage Brokers, Lenders and Servicers Licensing Act, Secondary Mortgage Loan Act, Mortgage Loan Originator Licensing Act, Regulatory Loan Act, Deferred Presentment Service Transaction Act, Consumer Financial Services Act, Debt Management Act, Money Transmission Services Act, Motor Vehicle Sales Finance Act, and Credit Card Arrangement Act are considered part of the financial services sector. Please review
				the Director's Bulletin no. 2020-11-BT/CF/CU for further information."
		Revised 04/06/2020		 The Department revised the consumer finance industry FAQs to add the following question and answer: Q: "The guidance provided in Bulletin 2020-11-BT/CF/CU concerning the specific industries included within the term "financial services" as used in Executive Order 2020-21 includes inspectors. Is the activity of inspectors limited?" A: "Nothing exempts critical infrastructure workers from the requirements under Executive Order 2020-21
				that any work must be completed remotely wherever possible. Where it is not possible to complete that work

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Minnesota / Department of Commerce	Guidance to MN Regulated Loan Companies Guidance to Minnesota Licensed Originators and Servicers (Companies and Individuals)	Published	_	remotely, it may occur subject to all applicable conditions in Executive Order 2020-21, such as social distancing practices and other mitigation measures to protect workers and patrons. Inspectors are included under the term "financial services" only to the extent that a loan program or an existing purchase agreement requires an inspection by a qualified inspector before the transaction can be completed. Any inspection activity conducted must abide by all applicable conditions in Executive Order 2020-21, such as social distancing practices and other mitigation measures to protect workers and patrons. Additionally, nothing in the bulletin requires the use of an inspector in connection with a transaction or that an inspector accept an assignment." • If a loan company closes a branch, the company must inform the Minnesota Commerce Department. o If the closure is temporary, the notification may be either via email or mail, and must also include a schedule for when the company expects the branch to reopen. Note, this schedule also must be conspicuously posted on the branch's front door. An additional notification must be made if there is a change to the schedule for reopening. o If the closure is permanent, the company must file a surrender request through the NMLS.
	Guidance to Minnesota Licensed Non-Depository Financial Institutions	03/18/20		• Some branch employees may work from home if (1) the branch continues to offer and close loans, (2) loans are closed under the address of the licensed branch, (3) consumers do not physically go to any unlicensed location for any part of the loan process, (4) no physical records are kept at the unlicensed location, and (5) the employee is able to maintain the company's data security policies and standards.

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	10/5			The Financial Institutions Division is implementing a temporary telework policy until, at least, April 1, 2020. The Division recommends using the provided email address as a means of contact.
	NMLS State Agency Operating Status spreadsheet		04/10/20	 All Minnesota Department of Commerce personnel working remotely. "Emails should be directed to the addresses listed on each of the relevant Checklists posted on the NMLS website."
	Regulatory Guidance 20- 09	03/30/20	0/	 The guidance is issued in response to the Commissioner of Commerce issuing an order granting licensees temporary extensions for certain deadlines. The Commerce Department extended the deadline to file Annual Reports to April 30, 2020 for regulated lenders, among other licensees.
Missouri / Division of Finance	Informal regulator guidance		0	Missouri Division of Finance's intention is to continue to provide as normal services as possible to citizens and industry during this situation.
	NMLS State Agency Operating Status spreadsheet	03/16/20		 Only essential Missouri Division of Finance personnel are working. "Phone calls and emails will be taken as normal." "All licensing and examinations will continue as normal. The Division utilizes technology to review and streamline the licensing and examination process and will continue to do so as normal. On-site visits at this time are very limited and would only be used in extreme cases. Public access to the Division is not available at this time."
Mississippi / Department of	Memo to CF Licensees	03/14/20		The Department of Banking and Consumer Finance has stated that they will be available to assist industry and consumers via telephone and email.

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Banking and Consumer Finance	MAO Interim Guidance NMLS State Agency	03/16/20	Date	 The Department is temporarily allowing "licensed mortgage loan originators to work from home, whether located in Mississippi or another state, even if the home is not a licensed branch," subject to certain requirements, including a prohibition against allowing consumers to come into the home and specified data security requirements. "Please email mortgage@dbcf.ms.gov for the Mortgage Division
	Operating Status spreadsheet	6		and consumer@dbcf.ms.gov for the Consumer Division."
	NMLS COVID-19 Filing Guidance	03/31/20	20%	 The due date for completion of the following reports is extended by 30 days: the 2020 Q1 Mortgage Call Report; the MCR Standard Financial Condition; the 2019 Q4 MSB Call Report; the 2020 Q1 MSB Call Report; and the annual Financial Statement for fiscal years ending Dec. 31, 2019 or later due to COVID-19.
Montana / Division of Banking and Financial	NMLS State Agency Operating Status spreadsheet	03/16/20	.0,	 All Montana Division of Banking and Financial Institutions personnel are working remotely. The Division requests all communication be sent electronically.
Institutions	Supervisory Memorandum on Operations During Novel Coronavirus Situation	03/19/20		 All Division office staff are working remotely and, therefore, will not be onsite to receive or process incoming mail. Written correspondence should be sent via email or file transfer service. Calling the office of the Division "will connect you with an administrative professional who will connect you with appropriate personnel."
	Communication with BDFI During Pandemic			As of March 16, the Division mandated telework for office staff and has requested communication (including electronic documents) be made via telephone and email.
	NMLS COVID-19 Filing Guidance	03/31/20		 The due date for completion of the following reports is extended by 30 days: the 2020 Q1 Mortgage Call Report; MCR Standard Financial Condition; and

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	M.			 the annual Financial Statement for fiscal years ending Dec. 31, 2019 or later due to COVID-19.
	DBFI Resources and Response to COVID-19	Rev. 04/02/20		 The Division is requiring the following data security measures be followed: "The licensed MLO must be able to access the licensed mortgage company's secure origination system (including a cloud-based system) directly from any out-of-office device that mortgage loan officer uses, using a virtual private network (VPN) or other similar system that requires passwords or other forms of authentication to access." "All security updates, patches, or other alterations to the device's security must be maintained." "Physical business records are maintained at the books and records location that is on file with the Division." The Division is extending the guidance provided for MLOs "to other non-depository licensees and their employees" and recommends reaching out with questions, if any, to them at mortgagelicensing@mt.gov. The Division has stated that it "is sensitive" to the COVID-19 challenges and "will be responsive to reviewing extension requests and other appropriate forms of regulatory relief arising from service and staff disruptions related to COVID-19." The Division is following the NMLS COVID-19 policy changes regarding certain report filing.
	Technology-Based Notarizations	04/02/20		The Division released instructions on notarizing a document online with respect to the two types of technology-based notarizations available to Montana notaries: remote online notarization and remote notarization.
Montana / Department of Administration	Notice of Adoption of Temporary Emergency Rule:	04/02/20		The Montana Department of Administration's new temporary emergency rule responds, in part, to the concerns received "from banks and credit unions regarding the difficulty of

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Nebraska / Office	In the matter of the adoption of Temporary Emergency Rule I pertaining to annual meetings held by banks and credit unions during the COVID-19 pandemic	Published	Date	holding an in-person annual meeting while complying with the stay-at-home directive and social distancing requirements." • The Department issued the following temporary emergency rule: • "NEW RULE I VIRTUAL ANNUAL MEETINGS HELD BY BANKS AND CREDIT UNIONS DURING DECLARED EMERGENCY OR DISASTER RELATED TO COVID-19 PANDEMIC (1) This rule is only effective when there has been a declaration by the governor of an emergency or disaster related to the COVID-19 pandemic. (2) During the period of a declaration by the governor of an emergency or disaster related to the COVID-19 pandemic, a bank or credit union may hold its annual meeting in the form of a virtual meeting. To satisfy the bank's or credit union's annual meeting requirement, a virtual meeting must be live, allow electronic or telephonic participation in the meeting in real-time, and provide simultaneous audio transmission of the meeting."
Nebraska / Office of the Governor	Executive Order No. 20-13: Coronavirus – Accelerating Online Notary Access and Financial Institutions Regulatory Flexibility	04/01/20		 The Executive Order waives specific Nebraska statutes "pertaining to the Online Notary Public Act and laws and regulations governing financial institutions that are under supervision of the Nebraska Department of Banking and Finance."

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				 The requirement that bank directors or an accountant must be "physically present in order to carry out the regulation to count cash"; The required submission of examination report copies by a board of directors or an accountant; and The requirement that "the Supervisory Committee or an accountant to file two copies of its report with the Department of Banking within 90 days from the starting date of the audit." The requirement for annual calendar examinations of installment loan companies' books and records is waived, and the Department will accomplish such examinations as soon as practicable. Effective until 30 days after the COVID-19 state of emergency is lifted, "only one electronic or paper original of an application mandated by Title 49 Nebraska Administrative Code Chapter 2 § 005.02 needs to be filed, and may have an electronic or manual signature."
Nebraska / Department of Banking and Finance	Mortgage Banker and Mortgage Loan Originator Guidance on Temporary Branch Relocations	03/12/20	12/31/20	The Nebraska Department of Banking and Finance is temporarily allowing licensed, and sponsored, mortgage loan originators to work from an unlicensed branch, including a home office, subject to certain requirements, including a prohibition against allowing consumers to come into the home, certain security requirements, and approval from the Department using a form provided by the Department.
	NMLS State Agency Operating Status spreadsheet	03/23/20	04/30/20	• Preferred methods of contact: tag.herbek@nebraska.gov, or call 402-471-2171.
Nevada / Division of Mortgage Lending	Provisional Guidance – Temporarily Working from Home	03/13/20		The Nevada Department of Business and Industry, Division of Mortgage Lending is temporarily allowing licensed MLOs to work from home, even if unlicensed.

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	NMLS State Agency Operating Status spreadsheet Mortgage Services COVID-19 Guidance	Published 03/18/20 03/27/20	Date 04/03/20	 Essential functions of the Division continues to be completed remotely, but with extended time frames. "For licensing matters: mldlicensing@mld.nv.gov. For anything else: mldinfo@mld.nv.gov. Phone 702-486-0782leave a VM and the Division will return the call." "In aligning with federal government, Division urges Mortgage Servicers and Mortgage Companies to assist Nevadans by considering following actions: As of the mortgage payment due date - 60 days mortgage payment forbearance. No reporting of late payments to major credit reporting agencies for period of 60 days. Regarding current loan modifications – provide options for additional 60 days grace period to address modifications and refrain from allowing COVID-19 issues harming current modification efforts. Waiving of late payment fees and any transactional fees for period of 60 days. Refrain from foreclosures for period of 60 days. If office closures occur, ensure that consumers are provided information and/or alternative services online so that the mortgage servicing functions are operational.
		0.1/00.100		 Inform, educate, and advise consumers via online platforms, email, telephone, mobile applications and etc. Ensure security of data and adequate supervision of processes in accordance to applicable state and federal laws and company disaster plans."
	NMLS COVID-19 Filing Guidance	04/03/20		 The due date for completion of the following reports is extended by 30 days: the 2020 Q1 Mortgage Call Report; the MCR Standard Financial Condition; and the annual Financial Statement for fiscal years ending Dec. 31, 2019 or later.

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New Hampshire / Banking Department	Responding to the Impacts (time) lovel Coronavirus 2019 (COVID-19)		Duc	Pursuant to the New Hampshire statutes, MLOs may work from home or another alternative work location, which is now exempt from the statutory requirement that the alternative location be within 100 miles of a supervisory office, subject to certain requirements, including security requirements. **Communication large model in the professor described of the communication of the professor described of the communication of th
	NMLS State Agency Operating Status spreadsheet	03/18/20		• "Communicating by e-mail is the preferred method of contact. Questions can be sent to licensing@banking.nh.gov and if not a licensing question the e-mail will be forwarded to someone that can assist with the question."
	FAOs on Mortgage foreclosures During the COVID-19 Pandemic	03/31/20		This guidance reiterates the prohibition on foreclosures and forbearance relief by both state and federal governments.
	NMLS COVID-19 Filing Guidance	03/31/20		 The due date for completion of the following reports is extended by 30 days: the 2020 Q1 Mortgage Call Report; and the MCR Standard Financial Condition. Regarding the annual financial statement, the New Hampshire Banking Department is allowing companies to upload unaudited statements.
	Agency homepage	04/03/20		• "Financial institutions are considered an essential business and remain open during the stay-at-home order. Please visit your financial institution's website regarding changes in branch hours and branch closures. Many financial institutions have temporarily closed their lobbies but banking services are available through the drive-thru, ATM, or by appointment. View the list of Control of temporary branch closures."
	Guidance on Paycheck Protection Program and the Legal Lending Limit	04/03/20		The guidance states and explains that the loans made under the Paycheck Protection Program, established under Section 1102 of the CARES Act, are exempt from the New Hampshire statutory legal lending limit.
New Jersey / Department of Banking and	NMLS State Agency Operating Status spreadsheet	03/18/20		On a daily basis, limited, essential New Jersey Department of Banking and Insurance Office of the Commissioner personnel will be in the main office. "Email is the preferred method of

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Insurance Office of the Commissioner				communication. Please email all documents toblicbc@dobi.nj.gov or the assigned reviewer rather than mailing them." • "For licensing inquiries or work from home requests per NJ Bulletin 20-06 please email Daniel Schusterdaniel.schuster@dobi.nj.gov or Howard Wegenerhoward.wegener@dobi.nj.gov. For inquiries about mortgage loan originator license applications please email Regina Michaelsregina.michaels@dobi.nj.gov."
	<u>Disruption</u> Resulting from COVID-19	03/19/20	04	• The Department encourages the regulated entities/individuals of the banking division to take actions (consistent with safe-and-sound banking practices), including: relaxing due dates for loan payments, extending grace periods, modifying terms on existing loans, easing credit card limits, extending new credit, waiving late fees and other fees, allowing customers to defer or skip payments, and delaying the submission of delinquency notices to credit bureaus.
	COVID-19 Matters	03/19/20	Until further notice	 The Department will expedite, as appropriate, any request to provide more convenient availability of services in affected communities where operational challenges persist. The Department also reminds licensees to provide prompt notice to the Department regarding changes to branch hours. All notices, inquiries, correspondence, and applications must be submitted via email (not by courier, overnight, mail, or fax).
	No Action Position Regarding Temporarily Working From Home Due to COVID-19	03/19/20	April 30, 2020	 With submission of specified materials, individuals working for OCF licensees currently licensed, or authorized to operate, in NJ may temporarily work from home. Required materials include: (1) a list of all individuals working on behalf of the OCF licensee seeking no-action dispensation; (2) a certification by the OCF licensee that the work-from-home individuals have a reason related to the COVID-19 outbreak for working from home, and have informed the OCF licensee; and (3) a certification

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	Drygg Polic Gol Cayraga ar	02/28/20		by the OCF licensee that the location(s) of the work- from-home employee(s) will maintain the consumer's right to privacy.
	Press Rela se. Governor Murphy Announces Mortgage Payment Relief, Financial Protections for New Jerseyans Facing Economic Hardship as a Result of COVID-19	03/28/20		 Governor Murphy announced a new initiative in which financial institutions commit to provide mortgage forbearance and financial protections for New Jersey residents facing economic hardship due to the COVID-19 emergency. Relief provided by the financial institutions to borrowers impacted by COVID-19 under this initiative includes: Mortgage payment forbearances for a period up to 90 days; Derogatory tradelines (e.g., late payments) will not be reported by the financial institution to credit reporting agencies; A 60-day minimum moratorium on financial institutions imitating foreclosure sales or evictions; and Waiver or refunds for a minimum of 90 days for, at least, mortgage-related late fees and other fees (e.g., early CD withdrawals).
	COVID-19 and Residential Mortgage Relief	3/28/20		 New Jersey residents struggling with the COVID-19 crisis may be eligible for the following residential mortgage relief: 90-day grace period for all mortgage payments; Relief from fees and charges for 90 days; No new foreclosures for 60 days; and No credit score changes for accessing relief. To apply for mortgage relief and/or forbearance, individuals must contact their mortgage servicer, with whom the terms of a forbearance (e.g., length of forbearance) will be agreed. Financial institutions may report a forbearance but not derogatory information to credit reporting agencies.
	Agency Homepage	3/28/20		Although the Department's buildings are closed to visitors, many of the Department's employees are working remotely and the Department remains open for business.

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	Bulletin 20-09 - No Action Fostion Regarding Potential Disruptions Due to COVIE 19	03/30/20		 This bulletin states the Department's intent to provide regulatory assistance to institutions affected by COVID-19, subject to the Department's supervision. "Real estate prelicensure courses may be taught in an on-line format, such as in a webinar, a virtual classroom, or by video conferencing. Persons seeking to teach these courses online should direct questions by email to Gwendolyn Cobb, Supervisor of Licensing and Education, at Gwendolyn.Cobb@dobi.nj.gov. Courses must still meet the regulatory requirements regarding length and subject matter." To the extent that the New Jersey Executive Order No 103 is in effect, the Department is relaxing the following requirements: "applicants must pass the licensure test within one year of passing a prelicensure course" and "applications for licensure must be submitted within one year following the date an individual passes the real estate prelicensure course." When either of the above requirements are relaxed, the Department may request additional information as part of the application evaluation. A Notice of Rule Suspension was issued as an emergency adoption of temporary rule suspension for the above rules.
New Mexico / Financial Institutions Division	Temporary Regulatory Guidance regarding Work from Home due to COVID-19 Concerns	03/17/2020		The New Mexico Financial Institutions Division is temporarily allowing mortgage licensees and staff to work from their home residence, even if unlicensed,, subject to certain requirements, including a prohibition against allowing consumers to come into the home and certain security requirements.
New York / Department of Financial Services	Industry Letters			The New York Department of Financial Services requires each regulated institution to submit within 30 days: (i) a response to the Department describing the institution's plan to manage the potential financial risk that could arise from the COVID-19 outbreak, including certain minimum assessments, (e.g., credit rating risks); and (ii) a response to the Department describing the institution's plan to manage the risk of disruption to

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	4			operations and services, including certain minimum components (e.g., preventative measures to mitigate operational disruption risks).
	NMLS State Agency Operating Status spreadsheet	03/18/20		 "Application processing continues. Please submit questions as follows: Mortgage Loan Originator - MLO@dfs.ny.gov Mortgage Banker - Mortgage.Banker@dfs.ny.gov Mortgage Broker - Mortgage.Broker@dfs.ny.gov Mortgage Loan Servicer - MLS@dfs.ny.gov"
	NMLS COVID-19 Filing Guidance	03/31/20		 The due date for completion of the following reports is extended by 30 days: the 2020 Q1 Mortgage Call Report; the MCR Standard Financial Condition due to COVID-19; and the completion of the annual Financial Statement for fiscal years ending Dec. 31, 2019 or later due to COVID-19.
North Carolina / Commissioner of Banks	NMLS State Agency Operating Status spreadsheet	03/16/20		 Only essential North Carolina Commissioner of Banks personnel are working. "The Agency is closed to the public, except by appointment only. Most employees are telecommuting, but a skeletal crew reports to the office daily. The public and licensees are encouraged to use email rather than phone for a quicker response. For questions, please use the following email addresses: Mortgage lender, broker or servicer – company@nccob.gov Mortgage Loan Originators – mlo@nccob.gov Reverse Mortgage Companies – reverse@nccob.gov Money Transmitters – ljohnson@nccob.gov"
	Operation Changes	03/17/20		Regulated entities should inform the OCOB of changes in operations or services offered

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	И.			The OCOB will be telecommuting as much as possible and request the use of electronic means for communicating.
	Agency nomepage			The Commissioner continues to operate on a normal schedule. However, access to the agency's office building will be by appointment only.
	NMLS COVID-19 Filing Guidance	04/02/20		 The due date for completion of the following reports is extended by 30 days: the 2020 Q1 Mortgage Call Report; the MCR Standard Financial Condition; the 2020 Q1 MSB Call Report; and the annual Financial Statement for fiscal years ending Dec. 31, 2019 or later. "A 30-day extension was granted to file the 1Q20 MCR and MSBCR and to submit annual financial statements. Also, the same extension was granted for uploading mortgage loan data through NCCOB Online." With regard to the completion of the 2019 Q4 MSB Call Report due to COVID-19, companies in need of additional time to complete this report should contact the North Carolina Commissioner of Banks with an extension request.
North Dakota / Department of Financial	Preparations for Covid-19 – March 5			Financial institutions deeming it necessary to close or reduce service hours at a branch location must notify the North Dakota Department of Financial Institutions.
Institutions- Consumer Division	NMLS State Agency Operating Status spreadsheet	03/23/20		 There is limited Department staff onsite at the main office with the majority of staff members working remotely. Please send licensing emails to cludwig@nd.gov. General inquiries can be sent to dfi@nd.gov.
	NMLS COVID-19 Filing Guidance	04/01/20		 The due date for completion of the following reports is extended by 30 days: of the 2020 Q1 Mortgage Call Report; the MCR Standard Financial Condition; the 2019 Q4 MSB Call Report; the 2020 Q1 MSB Call Report; and

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	И.			o the annual Financial Statement for fiscal years ending Dec. 31, 2019 or later.
Ohio / Division of Financial Institutions, Consumer Finance	Mortrage Loan Originators and Installment Lenders Teleworking JAC	03/30/20		 MLOs may work from home, provided that the MLO is reasonably overseen by a registered or exempt company and does not engage in activities that would classify their home office as a branch of the company under the definition of a "branch office" in the Ohio Revised Code 1322.01(G) (e.g., an MLO cannot use their home address location on business cards, post public signs or open hours, or otherwise publicly suggest that mortgage transactions are made at their home). A Consumer Installment Loan Act licensee's employees may make loans via the internet and telephone while working from home during the state of emergency, in addition to making loans in the parking lot of a licensed location. With regard to remote work, "MLOs and other employees must be reasonably supervised by the companies they work for, and the companies must have reasonable measures in place to ensure information security under applicable federal and state requirements." The Division will not enforce the regulation requiring RMLA registrants, during any state of emergency, to maintain 9am – 5pm office hours on the second Thursday of the specified months (February, April, June, August, October, and December). "Financial and insurance institutions" are classified as "Essential Businesses and Operations."
	NMLS COVID-19 Filing Guidance	04/01/20		The due date for completion of the following reports is extended by 30 days:
				 the 2020 Q1 Mortgage Call Report; the MCR Standard Financial Condition; the 2019 Q4 MSB Call Report; the 2020 Q1 MSB Call Report; and

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Oklahoma /	Interim Guidance Covid-	03/13/20		 the annual Financial Statement for fiscal years ending Dec. 31, 2019 or later. "Ohio DFI will honor the NMLS time extension for required reports. Furthermore, Ohio H.B. 197 gives companies a 90-day window after the current emergency period has ended, as determined by the Ohio Governor, to file information necessary to maintain your license." MLOs and employees of regulated entities working from home
Department of Consumer Credit	19			are allowed to work from a home that is not a licensed location if: (a) the licensed MLO must be able to access its employer's secure origination system directly from any out-of-office device the MLO uses through a VPN or similar system that requires passwords or other forms of authentication to access; (b) the licensed MLO does not keep any physical business records at any location other than the licensed main office; (c) consumers do not physically visit the home; and (d) all security updates, patches, or other alterations to the devices' security are maintained. If a licensee elects to amend the address of a licensed location temporarily, no operations may occur at the compromised location until the Oklahoma Department of Consumer Credit is notified of the reversion to the address of the original licensed location. During the period of operation at the temporary location, the original location must have a notice posted on the door at all times with the temporary location address, contact information for the licensee, as well as the phone number of the Department.
	NMLS State Agency Operating Status spreadsheet	04/03/20 (effective 03/11/20)	04/30/20	 All Oklahoma Department of Consumer Credit personnel are working remotely. "For COVID-19 questions, please email: questions@okdocc.ok.gov, General Inquiries, please email: licensing@okdocc.ok.gov. Please communicate electronically until further notice."

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Oregon / Division of Financial Regulation	COVID-19 Insurance and Financial Services	03/13/20		 Licensees must notify the Oregon Department of Financial Regulation of any MLO that is working form an unlicensed location. In addition, licensees must provide copies of any temporary procedures put in place during this time and must ensure adequate supervision of MLOs. The Division will allow MLOs and employees of licensed mortgage lenders, mortgage loan servicers, consumer finance companies, payday/title lenders and manufactured structure dealers to work from home when the home is not licensed, if the licensed company meets certain requirements, including: (a) providing prior notice to the DFR of the intent to allow employees to work from home; (b) having appropriate policies and procedures, and providing such policies and procedures to the DFR, for remote work that cover, among other things, protecting consumer's personal data, among other things, and (c) not allowing employees to meet consumer at the employee's home. The Division's building is closed to the public, but the Division remains available by phone and email.
	Information for Consumers NMLS State Agency Operating Status spreadsheet NMLS COVID-19 Filing Guidance	03/23/20		 "Office is open to personnel but closed to the public. Employees are encouraged to telecommute but are not required to do so. The public and licensees are encouraged to use email rather than phone for quicker response as the employee may be working from home without easy access to return calls." "Oregon DFR is suspending our enforcement activity for an indeterminate period of time. When the virus emergency is over, we will announce a specific deadline to comply with the deadlines that have passed. We will give at least 30 days for companies to get the reports filed. Companies who do not comply by the end of that period will be referred for enforcement action."

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Oregon / State Government	Oregon Coronavirus Information & Resources	Updated 03/30/20		• The guidance was updated to clarify the following regarding the March 23, 2020 Executive Order from Governor Kate Brown: "Executive Order 20-12 lists specific categories of businesses that must be closed. Other retail businesses not on that list may continue operating, but only if they can maintain social distancing protocols. Additionally, Executive Order 20-12 does not apply to grocery stores, health care facilities, medical facilities, and pharmacies, but those facilities are encouraged to comply with social distancing protocols whenever possible."
Pennsylvania / Department of Banking and Securities	Information & Guidance for Non-Depository			 The Pennsylvania Department of Banking and Securities has stated that it "will not take exception to licensees and registrants working from alternate site locations, whether licensed or not, only while the Commonwealth of Pennsylvania is under a Proclamation of Disaster Emergency." "Any document that will be mailed to the Non-Depository Deputy or placed in the drop-box including to the Deputy Secretary, Licensing Division, Bureau of Examinations, or Compliance Division must also be sent electronically to the appropriate email address and if the mailing includes a paper check, a digital copy of the physical check must be included. Licensing: RA-AskLicensing@pa.gov; Examinations: csnyderhou@pa.gov; Compliance: ra-AskCompliance@pa.gov."
	COVID-19 Information and Guidance for Financial Institutions and Consumers			"The physical locations for the Department of Banking and Securities are currently closed and the Department is maintaining operations through electronic communication."
	NMLS COVID-19 Filing Guidance	03/31/20		 The due date for completion of the following reports is extended by 30 days: the 2020 Q1 Mortgage Call Report; the MCR Standard Financial Condition; the 2019 Q4 MSB Call Report; the 2020 Q1 MSB Call Report; and

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				o the completion of the annual Financial Statement for
				fiscal years ending Dec. 31, 2019 or later.
	Ager of Homepage	04/02/20		The Department clarified that only "certain" non-depository
				licensees are permitted to continue physical operations,
				including: check casher companies, consumer discount
				companies, credit services loan brokers, money transmitters,
				mortgage brokers, mortgage discount companies, mortgage
				lenders, mortgage loan correspondents, mortgage loan
		6		originators, mortgage servicers, pawnbrokers, and sales finance
				companies. Non-depository licensees who must shutdown their
				physical locations include: debt management services, debt
				settlements services, and installment sellers.
Puerto Rico /	COVID-19 Guidance	03/17/20		"All deadlines for the filing or submission of answers to
Bureau of Financial				complaints, requests for information, all types of financial
Institutions				reports (including quarterly and/or monthly reports), license
				renewals, in addition to any other deadline imposed by the
			40	OCFI or by law, which becomes due between March 16, 2020
				and April 14, 2020, will be extended to April 15, 2020."
				All documents filed to comply with such deadlines will
				be received electronically. If electronic filing is not
			•	possible, the document, the licensee should call the
			•	OCFI, on the date in which OCFI resumes regular
				operations, for further instructions.
				Abandoned property claims due to be filed between March 16,
				2020 and March 30, 2020 must be filed on the business day
				following the first day in which the OCFI resumes its normal
				operations.
				Between March 16 and the reopening date of the OCFI, all
				consultations and/or questions from the industry, employees or
				general public must be submitted via email to the Deputy
				Commissioner of Financial Institutions.

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Rhode Island / Department of Business	Informal regulator guidance	1 ublished	Date	The Rhode Island Department of Business Regulations is working from home but does not anticipate any changes to the review process.
Regulations	Interim Regulatory Guidand — Remporarily Working from Huma	03/13/20	04/30/20	"The Department will not take administrative or other punitive action against a licensed MLO or the sponsoring licensed company if": (a) the licensed MLO access its employer's secure origination system directly from any out-of-office device the MLO uses through a VPN or similar system that requires passwords or other forms of authentication to access; (b) the licensed MLO does not keep any physical business records at any location other than the licensed main office; (c) consumers do not physically visit the home; and (d) all security updates, patches, or other alterations to the devices' security are maintained.
	NMLS State Agency Operating Status spreadsheet	03/23/20	0/0	"The RI Department of Business Regulation is open for business, however, we are only staffing our offices with a reduced number of employees. The public is not recommended to visit our office. All employees are performing job functions remotely and remain in contact with industry and consumers."
	NMLS COVID-19 Filing Guidance	03/31/20		 The due date for completion of the following reports is extended by 30 days: the 2020 Q1 Mortgage Call Report; the MCR Standard Financial Condition; the 2019 Q4 MSB Call Report; the 2020 Q1 MSB Call Report; and the annual Financial Statement for fiscal years ending Dec. 31, 2019 or later.
South Carolina / Consumer Finance Division of the Board of Financial Institutions	<u>Homepage</u>			 "The Consumer Finance Division (CFD) is significantly decreasing the number of staff who will be in the office beginning Friday, March 20, 2020. Even though CFD staff will be limited, they will still provide critical business operations, including NMLS transition process and license requests." Questions to CFD should be sent in via email.

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	Interim Regulatory Condance	03/13/20		• "The Division will not take administrative or other punitive action against a licensed MLO or the sponsoring licensed company if the MLO conducts activities requiring licensure from home if:" (a) the licensed sponsoring company has temporary policies, procedures, and a plan for supervision in place while under the State of Emergency; (b) the licensed MLO access its employer's secure origination system directly from any out-of-office device the MLO uses through a VPN or similar system that requires passwords or other forms of authentication to access; (c) the licensed MLO does not keep any physical business records at any location other than the licensed main office; (d) consumers do not physically visit the home; and (e) all security updates, patches, or other alterations to the devices' security are maintained.
South Carolina / Department of Consumer Affairs	Department Operations Due to COVID-19	3/23/20	0/2	"Modified deadlines include: Mortgage Log Filing due June 1, 2020 (not March 31, 2020)"
South Dakota / Division of Banking	Informal regulator guidance		, O,	The South Dakota Division of Banking anticipates being able to work remotely and continue operations, but also indicated that processing times may be impacted.
	Interim Regulatory Guidance – Temporarily Working From Home	03/12/20	06/05/20	• The Division "will not take administrative or other punitive action against a licensed MLO or the sponsoring licensed company if the MLO conducts activities requiring licensure from home if": (a) the licensed MLO access its employer's secure origination system directly from any out-of-office device the MLO uses through a VPN or similar system that requires passwords or other forms of authentication to access; (b) the licensed MLO does not keep any physical business records at any location other than the licensed main office; (c) consumers do not physically visit the home; and (d) all security updates, patches, or other alterations to the devices' security are maintained.

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	NMLS State Agency Operating Status spreadsheet	03/16/20	05/01/20	"Telephone calls are answered as normal with phones forwarded; email is preferred method of communication"
	NMLS COVID-19 Filing Guidance	03/31/20		 The due date for completion of the following reports is extended by 30 days: the 2020 Q1 Mortgage Call Report due to COVID-19; the MCR Standard Financial Condition due to COVID-19; the 2019 Q4 MSB Call Report due to COVID-19; the 2020 Q1 MSB Call Report due to COVID-19; and the annual Financial Statement for fiscal years ending Dec. 31, 2019 or later due to COVID-19
Tennessee / Department of Financial Institutions	Interim Regulatory Guidance	3/23/20	Until further notice	 The guidance recognizes decisions made by licensees to temporarily modify work assignments to reduce exposure/transmission of COVID-19, provided that consumers do not travel to an employee's residence to conduct business. The guidance includes best practices for employees working remotely: "All computers and other devices that contain, or are used to access, confidential information should be encrypted and secure. Employees should be required to access the licensee's or registrant's secure data system remotely using a virtual private network (VPN) or similar system that requires passwords or other forms of authentication to access. All security updates, patches, or other alterations to the individual's access device should be maintained. The employee should not keep any physical business records at the remote location. Activity should be conducted in a private environment, rather than a public area." Questions and concerns should be directed to the Department via telephone or email.

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	NMLS COVID-19 Filing Guidance			 The due date for completion of the following reports is extended by 30 days: the 2020 Q1 Mortgage Call Report; the MCR Standard Financial Condition; and the annual Financial Statement for fiscal years ending Dec. 31, 2019 or later.
Tennessee / Office of the Governor	Executive Order No. 22	03/30/20 (effective 03/31/20)	04/14/2020	• This Executive Order, among other things, (i) urges all persons in Tennessee to stay at home, with exceptions for "Essential Activity" and "Essential Services," as defined in the Order, (ii) orders all non-Essential Service businesses/organizations to close, (iii) encourages Essential Activities and Essential Services to limit the frequency of such activities and services to the greatest extent possible, (iv) prohibits employers from requiring or allowing an employee to report to work if the employer knows the employee has tested positive for COVID-19, at least until the employee has satisfied the conditions for discontinuing home isolation under CDC guidelines.
	Executive Order 23	04/02/20		• This Executive Order No. 23 amends Executive Order No. 22 (dated March 30, 2020) "Safer at home" provision in the first paragraph. Whereas Executive Order No. 22 "urged" persons in Tennessee to stay home, Executive Order No. 23 replaces this language to state that "all persons in Tennessee are required to stay home," with exceptions for persons engaged in Essential Activity or Essential Services, as defined in Executive Order No. 22.
Texas	Home Equity Lending Guidance: Coronavirus Emergency Measures	04/01/20		 The joint financial regulatory agencies (Department of Banking, Department of Savings and Mortgage Lending, Office of Consumer Credit Commissioner, and Credit Union Department) issued guidance for home equity lenders to consider emergency measures as a response to the COVID-19 emergency. The guidance reiterates requirements, which do not contain disaster/emergency exceptions, that a home equity loan must be

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				"closed only at the office of the lender, an attorney at law, or a title company." In light of this requirement, the guidance recommends that lenders who are keeping their offices open and closing home equity loans at authorized locations should close loans while abiding by social-distancing recommendations. Examples include: o "Physical separation between the borrower and any employees (which may include physical barriers, partitions, or separate rooms)." o "Use of video or audio conference to communicate with the borrower and verify the borrower's identity." o "Use of electronic systems for the borrower to view documents, as well as electronic signatures (in accordance with Texas law and the federal E-Sign Act). o "Use of an online notary (in accordance with Texas law)." o "Minimizing the use of paper documents, and limiting the handling of paper documents after execution." o "Implementing enhanced sanitization protocol for areas occupied by the borrower (in accordance with recommendations of health authorities)." The guidance also addresses additional advances on existing home equity lines of credit, refinancing existing home equity loans, modifying existing home equity loans, and the relevant disaster exceptions applicable to the foregoing.
Texas / Department of Savings and Mortgage Lending	RE: Mortgage Entity Licensed Location Requirements and Branch Licensing	3/20/20		 The Texas Department of Savings and Mortgage Lending temporarily suspended "requirements that a physical office be open to the public during posted normal business hours." "Licensed MLOs may work from home or another remote location, whether located in Texas or another state, even if the home or remote location is not a licensed branch." "Licensed mortgage entities must ensure the following if a licensed residential MLO or mortgage loan staff works

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	State Savings banks	03/30/20		remotely: strict security of information is maintained, all physical business records are kept at a licensed office, not at the mortgage loan originator's home, a remote location or in any unlicensed branch office, and that consumers are not allowed to go to the mortgage loan originator's home." • The Department temporarily suspended the requirement that a
	Independent Audits			state chartered savings bank submit an independent audit no later than the 90th day after the date of its fiscal year ends.
Texas / Office of Consumer Credit Commissioner	Coronavirus Bulletin.	Rev. 03/25/20		• The Texas Office of Consumer Credit Commissioner will not take administrative action against licensees that conduct regulated lending activity from unlicensed locations, if: (a) the licensee prepares a written plan or documentation describing what steps it is taking, as well as the locations where regulated lending is taking place; (b) a licensee's employees access information in accordance with the licensee's written information security program under the federal Safeguards Rule, 16 CFR pt. 314; (c) the licensee's employees access secure electronic information from the company using a VPN or similar system that requires passwords or other forms of authentication; (d) the licensed MLO does not keep any physical business records at any location other than a licensed location; and (e) all security updates, patches, or other alterations to the devices' security are maintained.
Texas / Department of Banking	Industry Notice 2020-05: Business Continuity Planning Considerations – COVID-19	03/30/20		The guidance does not include any required action, only recommended considerations for maintaining essential bank business operations during the COVID-19 emergency.
Utah / Department of Financial Institutions	Communication to Mortgage Companies	3/12/20		The guidance allows for companies to temporarily reduce or suspend operations or reduce operating hours, without the approval of the Utah Department of Financial Institutions. In these instances, the company should (1) provide adequate notice to its customers and (2) send a notice via email to the Department's Supervisor of Consumer Credit and Compliance.

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	NMLS State Agency Operating Status spreadsheet	03/23/20		 "Telephone calls are answered as normal; email is preferred method of communication." "Questions related to MSBs should be directed to pcline@utah.gov. Questions related to Mortgage should be directed to astaheli@utah.gov."
	NMLS COVID-19 Filing Guidance	03/31/20		 The due date for completion of the following reports is extended by 30 days: the 2020 Q1 Mortgage Call Report; the MCR Standard Financial Condition; the 2019 Q4 MSB Call Report; the 2020 Q1 MSB Call Report; and the annual Financial Statement for fiscal years ending Dec. 31, 2019 or later.
Vermont / Department of Financial Regulations	Memorandum RE: Mortgage Loan Originators – Temporarily Working from Home or a Company Designated Location due to "COVID- 19"			 The Vermont Department of Financial Regulation will not take administrative action against licensed MLOs or their sponsoring companies if the MLO conducts activities from home, if, among other things: (a) the activity being conducted is required by the sponsoring licensed company; (b) the MLO is working from home because of the COVID-19 pandemic; (c) the MLO maintains all necessary licenses to conduct activity in Vermont; (d) no Vermont licensable activity is conducted in person at the home location; and (e) the licensed MLO access its employer's secure origination system directly from any out-of-office device the MLO uses through a VPN or similar system that requires passwords or other forms of authentication to access.
	Guidance on Financial Institution Operations Under Addendum 6 to Executive Order 01-20	3/26/20		 The guidance responds to the 3/24/20 executive order by the governor directing Vermonters to stay at home or in their place of residence, leaving only for essential reasons "Vermont financial institutions should avoid all person-to-person contact in the delivery of services. As outlined in Addendum 6, all financial services shall be conducted remotely, to the maximum extent possible, by: Mail

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	NMLS COVID-19 Filing Guidance	03/31/20		 Automated teller machines and remote service units Drive-through services employing appropriate precautions to avoid viral transmission Online Telephone, or Some other means that avoids in-person contact". "In order to promote remote transactions, financial institutions are encouraged to waive out-of-network ATM fees and any other fees or surcharges that would tend to discourage their use." "If a transaction or service cannot be done remotely, financial institutions should postpone the transaction or service until the end of the Stay Home / Stay Safe period if possible." The due date for completion of the following reports is extended by 30 days: the 2020 Q1 Mortgage Call Report; the MCR Standard Financial Condition; the 2019 Q4 MSB Call Report; the 2020 Q1 MSB Call Report; and the completion of the annual Financial Statement for fiscal years ending Dec. 31, 2019 or later due to COVID-
Virginia / State Corporation Commission	Order Regarding the State Corporation Commission's Revised Operating Procedures During Covid- 19 Emergency	3/19/20 (Effective 3/20/20)	5/15/20	 The Virginia State Corporation Commission (SCC) instituted the following 3 operating procedures: "In lieu of submitting any business entity, fictitious name or Uniform Commercial Code document to the Office of the Clerk in paper, persons should use electronic filing options. Submissions by mail or commercial mail equivalents (FedEx, etc.) will be accepted but, due to the emergency, may not be processed for an indefinite period of time." "The Commission has suspended in-person access to the Clerk's Office" and is requiring the following:

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				 "All pleadings should be submitted electronically to the extent authorized. Any person seeking to hand deliver and physically file or submit any pleading or other document required to be filed in a case pending before the Commission shall contact the Clerk's Office Document Control Center to arrange the delivery. For all other business, the Commission is directing the use of electronic filing systems, email, or telephone, in that order, for best services. "Any person seeking to hand deliver and physically submit any other document or payment to the Commission, shall instead deliver such filing or submission to the designated drop box located at the Security Desk in the 1st Floor lobby of the Tyler Building". To the extent feasible, documents deposited in this drop box by 4:45 p.m. on any given business day will be dated and deemed submitted on that day. Documents deposited after this time will be dated and deemed submitted on the next business day." "Electronic filings made in the Clerk's Office may exceed the 100-page limit otherwise prescribed."
	SCC Makes Temporary Changes to Normal Business Operations During COVID-19 Health Emergency	3/19/20		 The guidance directs all business be handled through electronic filing systems, email, or by telephone. The SCC is making temporary changes to normal business operations regarding on-site office activity to protect members of the public and SCC employees until the COVID-19 epidemic subsides. "The Clerk's Office will not be open to the public for inperson visits but will continue to receive and process documents, pleadings, and filings. In-person visits to other regulatory sections of the Commission are

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				suspended except by advance appointment. Currently scheduled hearings are subject to further order of the Commission. If filings or other deliveries must be made, drop-offs are permitted. The evolving health emergency has reduced on-site SCC staffing. Many employees are teleworking. The processing of drop-off deliveries may be delayed."
	Order Concerning Electronic Service of Commission Orders	3/19/20	May 15, 2020	 The customary service of Commission Orders by means of paper copies to persons listed on docket service lists in the Commission's Case Management System is suspended immediately. Service of Orders must be accomplished via e-mail.
	SCC Homepage			 "The SCC is directing all business with the Commission to be handled through electronic filing systems, email, or by telephone. The COVID-19 epidemic has reduced on-site staffing. For public health concerns, in-person visits to SCC offices are temporarily suspended. If you must make filings or other deliveries, drop offs are permitted. The processing of such may be delayed."
	Informal regulator guidance	3/24/20		Virginia regulators are mostly working from home now. They have set up secure emails for submitting application materials outside of NMLS and will invoice change of control fees, so we do not need to submit information outside of NMLS. Regulators are available through their work phone numbers.
	NMLS COVID-19 Filing Guidance	04/03/20		 The due date for completion of the following reports is extended by 30 days: the 2020 Q1 Mortgage Call Report; the MCR Standard Financial Condition; the 2019 Q4 MSB Call Report; and the 2020 Q1 MSB Call Report; "Money transmitter licensees must seek a waiver from the Commissioner of Financial Institutions for an extension of time to file the audited financial statement required by § 6.2-1905 D

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	И.			of the Code of Virginia. Waiver requests may be routed through Edward Gresham (edward.gresham@scc.virginia.gov)."
	NMLS State Agency Operating Status spreadsheet	04/03/20 (effective 3/20/2020)	5/15/2020	 Only essential SCC personnel are working. "The COVID-19 pandemic has reduced BFI's on-site staffing. We strongly encourage all business with the Bureau to be handled through electronic filing systems, email, or by telephone. If you must make filings or other deliveries, drop offs are permitted; however, the processing of such may be delayed."
Washington / Office of the Governor	Real Estate and Mort, age Guidance – Stay Home, Stay Healthy Proclamation (20-25)	03/27/20		 "While real estate activities along with mortgage lending activities have been approved as essential activities under the Proclamation, such activities shall only be permitted under the following restrictions and limitations: a) In-person meetings with customers are prohibited except when necessary for a customer to view a property or sign necessary documents; b) No real estate open houses shall be permitted; c) Property viewings, inspections, appraisals, and final walk-throughs shall be arranged by appointment and limited to no more than two people on site at any one time, exercising social distancing at all times; and d) Except for the limited exceptions authorized above, all new real estate listings shall be facilitated remotely." "It is permissible to engage in real estate sales, as appraisers, settlement agents and escrow officers, property inspectors, mortgage loan originators, processors, and underwriters, and other necessary office personnel including IT professionals, and back office staff necessary to maintain office operations, along with those government workers necessary to review real estate excise tax and record documents. All real estate and mortgage activities must meet social distancing and appropriate health and worker protection measures before proceeding."
	Essential Business Guidance - Real Estate and Mortgage Transactions (dated 3/27/20)	3/28/20		Real estate activities and mortgage lending activities have been approved as essential activities under the Stay Home, Stay Healthy Proclamation, provided that such activities are limited in the following ways: all new real estate listings must be

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				 facilitated remotely, subject to two limited exceptions: (1) Inperson meetings with customers are permissible but only when necessary for a customer to view a property or sign necessary documents; and (2) Property viewings, inspections, appraisals, and final walk-throughs are only permissible only when scheduled by appointment and must be limited to a maximum of two people on site at a time (provided they are exercising social distancing at all times). Real estate open houses are prohibited. "It is permissible to engage in real estate sales, as appraisers, settlement agents and escrow officers, property inspectors, mortgage loan originators, processors, and underwriters, and other necessary office personnel including IT professionals, and back office staff necessary to maintain office operations, along with those government workers necessary to review real estate excise tax and record documents. All real estate and mortgage activities must meet social distancing and appropriate health and worker protection measures before proceeding."
Washington / Department of Financial Institutions	Consumer Loan and Mortgage Broker Practices Acts Interim Regulatory Guidance	03/05/20	06/05/20	• The Washington Department of Financial Institutions (DFI) will not take administrative or other punitive action against a licensed MLO or the sponsoring licensed company if: (a) the licensed MLO access its employer's secure origination system directly from any out-of-office device the MLO uses through a VPN or similar system that requires passwords or other forms of authentication to access; (b) the licensed MLO does not keep any physical business records at any location other than the licensed main office; (c) consumers do not physically visit the home; and (d) all security updates, patches, or other alterations to the devices' security are maintained.
	NMLS State Agency Operating Status spreadsheet	03/19/20		 "Most DFI staff are teleworking in response to the COVID-19 outbreak. You can still access services online or by calling our office at 1-877-746-4334."

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	Guldante to Regulated	3/20/20		The guidance urges servicers to take reasonable and prudent
	and Exempt Residential			actions to support adversely impacted mortgagors with actions,
	Mortrage Loan Servicers			including: "forbearing mortgage payments for 90 days from
	Regarding Support for			their due dates; Refraining from reporting late payments to
	Borrowers Impacted by			credit rating agencies for 90 days; offering mortgagors an
	COVID-19			additional 90-day grace period to complete trial loan
				modifications, and ensuring that late payments during the
				COVID-19 pandemic does not affect their ability to obtain
		6		permanent loan modifications; waiving late payment fees and
				any online payment fees for a period of 90 days; postponing
				foreclosures for 90 days; ensuring that mortgagors do not
				experience a disruption of service if the mortgage servicer closes
		VA		its office, including making available other avenues for
				mortgagors to continue to manage their accounts and to make
				inquiries; and proactively reaching out to mortgagors via app
				announcements, text, email or otherwise to explain the above-
				listed assistance being offered to mortgagors."
	Agency Homepage		, ()	"DFI's Tumwater office will be closed to the public for a
				minimum of two weeks beginning Wednesday, March 25. Our
				agency, however, is continuing operations that can be
			•	accomplished through staff teleworking. Please call our main
			•	number at 360-902-8700 or toll-free at 877-RING-DFI (746-4334)
				to be connected with the appropriate division for assistance."
	Agency Homepage	04/02/20	05/04/20	Although DFI previously announced that the DFI Tumwater
				offices would be closed until April 8, 2020, DFI has now
				announced that the "office will be closed to the public until at
				least May 4."
West Virginia /	<u>Emergency</u>			"The majority of our staff will continue to work remotely
Division of	Announcements webpage			throughout this pandemic event. We are fully functional and
Financial				have implemented our pandemic plan."
Institutions	Regulatory	3/13/20	5/1/20	The guidance states the intent of the West Virginia Division of
	Communication COVID			Financial Institution to allow employees of regulated entities
	19 Guidance Temporary			temporarily to work from home or some other remote location

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	Assignment to Alternative Location			approved by the financial institution, whether located in West Virginia or another state. Regulated financial institutions may permit employees to work at home or from a designated remote location, to the extent that the position allows, as long as privacy and security issues may be adequately addressed. The following requirements apply: "1) The company must retain records identifying the dates and location(s) where each licensed mortgage loan originator worked remotely during the effective period when it does not match the employment location. The records must be available for review at the next examination cycle or upon request by the Division of Financial Institutions. 2) The company must have a current and approved policy for access to the company's secure origination system directly by the MLO through a VPN (or similar secured access) from any device approved by the company for use by the MLO in their daily work. The company must be able to demonstrate upon request, that such access is restricted to strong authentication procedures and passwords. 3) The licensed company is responsible for assuring that security is maintained with updates, patches, or other alterations to devices used to access the loan origination system. Records of such maintenance schedule must also be available upon request by the Division of Financial Institutions. 4) MLOs and other employees may not, under any circumstances, relocate any physical business records nor reproduce into paper format any record that contains personal or private information at any location other than those approved as a licensed location by the Division of Financial Institutions. 5) MLOs and other employees may not arrange to meet with borrowers at any remote or home-based location that has not been approved as a licensed branch location."
	NMLS COVID-19 Filing	04/01/20		The due date for completion of the following reports is extended 1
	Guidance			by 30 days: o the 2020 Q1 Mortgage Call Report;

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Wisconsin / Department of Financial Institutions	Mortgage Banking: COVID-19 Information & Resources	1 ublished	Date	 the MCR Standard Financial Condition; the 2019 Q4 MSB Call Report; and the 2020 Q1 MSB Call Report. "Annual financial statement must be provided through NMLS before September 30, 2020." The Wisconsin Department of Financial Institutions "will take a no-action position concerning a licensed mortgage loan originator working from a location that is not a licensed or registered office or branch office effective immediately, upon compliance with all of the following criteria: 1. The mortgage banker, broker or registered entity sponsoring the mortgage loan originator must notify the Division by sending an email to DFIMortgageBanking@wi.gov. No response will be issued to the email submission due to the no-action position. 2. The licensed mortgage banker, broker or registered entity sponsoring the mortgage loan originator must maintain a list of mortgage loan originators who elect to work from home where the home is not a licensed branch. The list should include the name of the licensed individual, address where the individual is working and dates during which the individual worked at that address. The list must be submitted to the Division upon request. 3. The mortgage banker, broker or registered entity shall enact appropriate data security measures and reasonable
				supervision of the acts of the mortgage loan originator. 4. Physical business records are not maintained at the unlicensed location. 5. Consumers may not be present at the unlicensed location."
	NMLS State Agency Operating Status spreadsheet	03/24/20		The majority of the Department's staff is working remotely and communicating via email.
	NMLS COVID-19 Filing Guidance	04/02/20		 The due date for completion of the following reports is extended by 30 days: the 2020 Q1 Mortgage Call Report;

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				 the MCR Standard Financial Condition; the 2019 Q4 MSB Call Report; the 2020 Q1 MSB Call Report; and the annual Financial Statement for fiscal years ending Dec. 31, 2019 or later. "Please note that per WI statutes, a mortgage banker or mortgage broker has 6 months after their fiscal year end to provide their required annual financial statements."
Wyoming / Division of Banking	NMLS COVID-19 Filing Guidance	04/02/20		 The due date for completion of the following reports is extended by 30 days: the 2020 Q1 Mortgage Call Report; the MCR Standard Financial Condition; the 2019 Q4 MSB Call Report; the 2020 Q1 MSB Call Report; and the annual Financial Statement for fiscal years ending Dec. 31, 2019 or later.
	NMLS State Agency Operating Status spreadsheet	04/02/20 (effective 03/19/20)	S	All Wyoming Division of Banking personnel are working remotely.