



STATE OF WASHINGTON
DEPARTMENT OF FINANCIAL INSTITUTIONS
DIVISION OF CONSUMER SERVICES

P.O. BOX 41200 • Olympia, Washington 98504-1200
Telephone (360) 902-8703 • TDD (360) 664-8126 • FAX (360) 596-3868 • <http://www.dfi.wa.gov/cs>

CONSUMER LOAN ACT

Interim Guidance, CLA-24-01

DATE: March 7, 2024
TO: Consumer Loan Act Licensees
FROM: Ali Higgs, Acting Director, Division of Consumer Services
RE: Additional Guidance on the State Specific Supplemental Form (SSSF)

Purpose

Beginning with the Mortgage Call Report for the first quarter of 2024 (“Q1 2024”), Consumer Loan Act licensees must complete the State Specific Supplemental Form (“SSSF”). This Interim Guidance expresses the Department of Financial Institutions’ (“Department”) intent to provide additional guidance on requirements related to the SSSF.

This Interim Guidance does not amend the Consumer Loan Act, chapter 31.04 RCW, or chapter 208-620 WAC. This Interim Guidance is subject to change or withdrawal.

The Department’s Guidance

Consumer Loan Act licensees are required to submit call reports through the Nationwide Mortgage Licensing System (“NMLS”) in a form and containing the information prescribed by the Department or as deemed necessary by the NMLS.¹

Starting with the Q1 2024 MCR filing, licensees will be required to complete the SSSF, which will allow the Department to gather information on a quarterly basis on additional business activities conducted under the Consumer Loan Act. For Washington State activity, licensees are required to complete the subsections of the SSSF that are relevant to the activity conducted by the licensee pursuant to its Consumer Loan Act license.

The required subsections on the SSSF for Washington State include the below identified fields as applicable to the licensee’s activity. Licensees should review the [NMLS Mortgage Call Report Field Definitions & Instructions for Form Version 6](#) (link) to ensure that its filing is complete and accurate.

¹ RCW 31.04.277; WAC 208-620-431.

1. Consumer Loan Origination (SF200 – SF290)

- Non-Mortgage Secured Direct Loans (SF220)
- Unsecured Direct Loans (SF230)

2. Consumer Loan Servicing (SF500 – SF590)

- Non-Mortgage Secured Direct Loans” (SF520)
- Unsecured Direct Loans (SF530)
- The Department further clarifies that the reportable activity for this subsection pursuant to the Consumer Loan Act is student education loan servicing.²

3. Licensed Processors and Underwriters (SF600 – SF660)

- Licensees must complete all applicable fields in this subsection.

Any field that is not applicable to the licensee’s business activity pursuant to the Consumer Loan Act should be completed with “0” at this time. The allowance of completing a field as “0” on the SSSF is due to the NMLS filing system requirements, as the system does not allow for blanks or leaving fields blank.

Specific to “Gross Revenue from All Mortgage Operations” (SF1100), licensees may complete the field as “0.” Licensees are expected to continue completing the financial condition section of the call reports accurately and timely.

Licensees are required to file call reports accurately and timely.³ Failure to file an accurate and timely call report is a violation of the Consumer Loan Act.

// Prepared by: Jeanju Choi, Chief of Regulatory Affairs, Division of Consumer Services
jeanju.choi@dfi.wa.gov

² RCW 31.04.015(35).

³ RCW 31.04.277; WAC 208-620-431.