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GUIDANCE FOR LICENSEE EMPLOYEES WORKING FROM REMOTE LOCATIONS

Until further notice, regardless of a pandemic declaration or not, the IDOB has no objections to a licensee permitting its Employees to work from a Remote Location under the supervision and in compliance with the licensee's written policies and procedures subject to the conditions identified below:

- For purposes of this guidance Employees include licensed or registered mortgage loan originators (MLO) sponsored by the licensee;
- Remote Location means a location at which the licensee Employees may conduct business other than the licensed or registered location;
- No in-person face-to-face customer interaction will occur at a Remote Location.
- Customer interactions and conversations about consumers will comply with federal and state information security requirements including applicable provisions under Gramm-Leach-Bliley Act and the Safeguards Rule established under the Federal Trade Commission set forth at 16 CFR Part 314;
- Physical records shall not be maintained at a Remote Location;
- Employees working from a Remote Location must access the company's secure systems (including a cloud-based system) directly from any out-of-office device such employee uses (laptop, phone, desktop computer, tablet, etc.) via a virtual private network (VPN) or comparable system that ensures secure connectivity and requires passwords or other forms of authentication to access;
- Licensee shall ensure that appropriate security updates, patches, or other alterations to the security of all devices used at Remote Locations are installed and maintained;
- Licensee must have an ability to remotely lock or erase company-related contents of any device or remotely limit all access to a company's secure systems;
- License shall employ appropriate risk-based monitoring and oversight process and any employee that will work from a Remote Location agrees to comply with the Licensee's established processes;
- Licensee shall, at least once annually, certify that all Employees engaging in remote activity meet the appropriate standards and safeguards to continue such activity;
- The NMLS record of a MLO that works from a Remote Location shall designate the Registered Location as the licensed corporate headquarters location unless such MLO elects to choose a licensed or registered branch location; and
- All other Iowa laws remain in effect, and it is still the responsibility of all licensed companies to oversee the activities of their Employees and to conduct business in a manner that otherwise complies with all applicable Iowa laws.

Thanks,

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