



COMMISSIONER OF FINANCIAL
REGULATION
ADVISORY NOTICE
REGULATORY ALERT



April 15, 2019

INDUSTRY ADVISORY

FORECLOSURE REGISTRATION SYSTEM – RECENT SYSTEM UPDATES AND REMINDERS

This advisory provides clarification on recent updates to the Maryland Foreclosure Registration System, specifically: creating a user account, transferring registrations, importing legacy registrations, and updating registrations. This advisory also includes reminders regarding system functionality.

The [Foreclosure Registration System](#) (“FRS”) is a web-based application for submission to the Maryland Department of Labor and Commissioner of Financial Regulation of those foreclosure-related notices and registrations that are mandated by Maryland law. The FRS launched in October, 2018 with the Notice of Foreclosure Filing function (*see* Md. Code Ann., Real Property Article, §14–126.2). The Foreclosed Property Registry transition to the FRS occurred in January, 2019 (*see* Md. Code Ann., Real Property Article, §14–126.1).

The planned transition of the Notice of Intent to Foreclose (“NOI”) filings to the FRS is currently under development and is expected to be released later in 2019. **If you need to submit an NOI pursuant to Md. Code Ann., Real Property Article, §7-105.1(c) and COMAR 09.03.12.02, please continue to use the existing NOI electronic system available at <https://www.dllr.state.md.us/NOI/>.** Notifications will be posted online and sent via email before NOI transition to the FRS occurs.

CREATING A USER ACCOUNT

The “Individual User-Input Agent” account type is for an individual *not* employed by a company or firm; this definition includes independent real estate brokers. There is now an “agent/broker” option on the Input Agent account page to distinguish real estate brokers from other individual users. **If you are an independent real estate broker – i.e. *not* considered a company employee – please log in to the system and select “My Account” to update your account profile to reflect your status as an independent agent/broker.** If you are an agent or broker employed by one company, then this distinction does not apply to you. Your company should have a company account and you should have a user account affiliated with the company account.

NOTE: Do *not* create an Individual User account (with “NA” for the company name) if you are employed by a company or firm. If you are employed by a company or firm that functions as a vendor for multiple lenders, secured parties, or foreclosure purchasers, you must have a Company User account in *your* company's name. If you created your account with “NA” but you should be associated with a company, or if you created an account under the wrong company name, please [notify Financial Regulation staff](#) immediately so your account can be corrected.

Also, please remember that Company Administrators are responsible for approving new input account requests within their company account – this includes approving other Company Administrator accounts. Financial Regulation staff are only responsible for approving the first Company Administrator account; Financial Regulation staff will *not* approve subsequent Company Administrator accounts after the initial account is approved. **If you are a Company Administrator, please check your emails or go to “My Company” on the system menu to determine if there are account requests pending your approval.**

FORECLOSED PROPERTY REGISTRATION TRANSFERS

There is now a “Transfer Foreclosed Property Registration” function available to Company Administrators on every Foreclosed Property Registration Details page in the FRS. This function is for transferring a foreclosed property registration (FPR) from the current company account to another company account, without the assistance of Financial Regulation staff.

This transfer function should be utilized if a foreclosure sale purchaser has changed vendors and the new vendor needs access to an FPR in the previous vendor’s account. The new vendor may need access to update the FPR information, print a copy of the FPR, and/or submit a final registration. Only Company Administrators can initiate FPR transfers to another company, and only Company Administrators can accept FPR transfers from another company.

The foreclosure sale purchaser should inform their vendors when an FPR needs to be transferred to another company (compliance with the statutory requirements are the responsibility of the foreclosure sale purchaser). The previous vendor must transfer the registration to the new vendor. The new vendor cannot access an FPR unless the previous vendor transfers it to the new vendor’s company account, and it is accepted and assigned by a Company Administrator for the new vendor. There is no limit to the number of times an FPR can be transferred. See the [User Guide](#) for instructions on using the transfer function.

NOTE: If an FPR needs to be transferred but the previous vendor is unavailable or unable to initiate the FPR transfer, the new vendor should contact Financial Regulation staff for an *FPR Transfer Request Form*. Upon receipt of a completed form, Financial Regulation staff may initiate transfer of the FPR to the correct vendor’s company account. At this time the transfer function is not available to Individual Users; however, Individual Users may also contact Financial Regulation staff for an *FPR Transfer Request Form*.

LEGACY PROPERTY REGISTRATION DATA

FPRs that were submitted on the old registry site, which was phased out in January, 2019 (“legacy registry”), have been migrated to the FRS. **Please be aware that in order for a company or individual user to have**

access to their legacy registry FPRs, the company or individual user must import the legacy FPR data into their account. This process assigns the FPRs to their account in the new system, thus allowing the user to edit or update the legacy FPR and/or submit a final registration. See the [User Guide](#) for instructions on importing legacy registry data.

If a current user needs access to legacy FPRs submitted by a different user who does not have an account on the new system, the current user may import the legacy registry data from another user's account. However, the current user *must* have the prior user's login credentials for the legacy registry. If the login credentials are not known, please contact Financial Regulation staff for assistance.

NOTE: Legacy FPRs can be identified on the new system by the submission date (prior to January 2, 2019). Legacy FPRs will also have the word "LEGACY" in the tax account number field with the company code from the legacy account. This field may be edited to the correct tax account number.

CHANGES IN PROPERTY REGISTRATION INFORMATION

As a reminder, pursuant to Md. Code Ann., Real Property Article §14–126.1(d)(5), foreclosure purchasers are *required* to update FPRs if there is any change to the following information:

- the name and address of the person, including a substitute purchaser, who is authorized to accept legal service;
- the name, telephone number, and street address of the person responsible for property maintenance;
- whether the property is vacant; and
- whether the purchaser has possession of the property.

The updates must be submitted within 21 business days after the change in information is known to the purchaser. **The submission process for all initial FPRs requires the user to acknowledge "Updates to Initial Registration" conditions and requirements.** See the [User Guide](#) for instructions on updating registrations.

ADDITIONAL SYSTEM UPDATES

Several other system updates have been recently implemented: PDF downloads have been reformatted for consistency and to reduce whitespace; there is a "show duplicates" option on FPR search (*see* the [User Guide](#) for the definition of "duplicate"); there is a "loading" graphic when the site is performing an action; on-screen text was revised on several pages; and the User Guide was revised with a notation on the side menu to show when a new version of the guide has been uploaded.

The Foreclosure Registration System is available at <https://www.dllr.state.md.us/ForeclosureSystems/>.

Instructions for using the Foreclosure Registration System are in the User Guide available at https://www.dllr.state.md.us/ForeclosureSystems/Documents/FRS_User_Guide.pdf and in the side menu on the Foreclosure Registration System website.

The Commissioner's staff, on behalf of the Department, is available to assist users of the Foreclosure Registration System. Please contact staff at FinReg.ForeclosureSystems@maryland.gov or (410) 230-6245 if you need assistance after reviewing the User Guide.

***NOTE:** Previous industry advisories regarding the Maryland Foreclosure Registration System were issued [December 31, 2018](#), [December 7, 2018](#), and [September 19, 2018](#). Please refer to these advisories for additional information regarding the registration system and requirements.*



Office of the Commissioner of Financial Regulation
Maryland Department of Labor, Licensing and Regulation
500 North Calvert Street #402· Baltimore, MD 21202

Questions? [Contact Us](#)
