



STATE OF CONNECTICUT  
DEPARTMENT OF BANKING  
260 CONSTITUTION PLAZA – HARTFORD, CT 06103-1800



**Jorge L. Perez**  
Commissioner

**ORDER ESTABLISHING REQUIREMENTS FOR CONDUCTING BUSINESS FROM A  
REMOTE OFFICE LOCATION**

**I. Background**

Since March 9, 2020, pursuant to a no-action position issued to mitigate the spread of COVID-19, the Banking Commissioner has permitted individuals engaged in certain licensable activity on behalf of certain consumer credit licensees to work from remote office locations not licensed as branch office locations. Although such no-action position expired on June 30, 2021 due to the waning of the COVID-19 pandemic, the Commissioner wishes to extend the ability of individuals to work from remote office locations pursuant to the recently enacted authority set forth in Section 205 of Senate Bill 1202 of the June Special Session of the Connecticut General Assembly, as amended by Senate Amendment A and House Amendments A, G and H (“Section 205 of S.B. 1202”).

**II. ORDER**

Pursuant to authority set forth in Section 205 of S.B. 1202, I hereby order that individuals engaged in certain licensable activity may conduct such activity from a remote office location as follows:

1. License Types – This order shall apply to individuals working on behalf of persons licensed as:
  - consumer collection agencies under Sections 36a-800 to 36a-814, inclusive, of the Connecticut General Statutes;
  - debt adjusters under Sections 36a-655 to 36a-665, inclusive, of the Connecticut General Statutes;
  - debt negotiators under Sections 36a-671 to 36a-671f, inclusive, of the Connecticut General Statutes;
  - mortgage brokers, mortgage correspondent lenders or mortgage lenders under Sections 36a-485 to 36a-534b, inclusive, of the Connecticut General Statutes;
  - mortgage servicers under Sections 36a-715 to 36a-719l, inclusive, of the Connecticut General Statutes;
  - sales finance companies under Sections 36a-535 to 36a-547, inclusive, of the Connecticut General Statutes;
  - small loan companies under Sections 36a-555 to 36a-573, inclusive, of the Connecticut General Statutes; and
  - student loan servicers under Sections 36a-846 to 36a-854, inclusive, of the Connecticut General Statutes.

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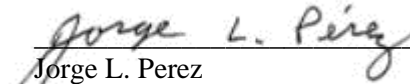
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2. Remote Office Location – Any residential or non-commercial location in the United States at which an individual engages in authorized activity on behalf of a licensee, other than a location licensed as a main office or branch office as defined in the applicable licensing provisions, may be considered a remote office location.
3. Standards – Any licensee that conducts business from a remote office location shall:
  - (A) Maintain records identifying the dates of authorized remote office activity, the location of each remote office at which it conducts business and the names of all individuals authorized to conduct business at each remote office location;
  - (B) implement policies and procedures to ensure reasonable supervision over its remote office activities;
  - (C) ensure that no records of licensable activity are maintained at the remote office location;
  - (D) ensure that any individual working from the remote office location is licensed under Title 36a to conduct such remote office activity, as applicable;
  - (E) not meet with members of the public at such remote office location or otherwise hold out the remote office location as an office location to members of the public;
  - (F) for any licensed individual conducting business from a remote office location, designate a licensed branch office or main office location as the location of business on the system, as defined in Section 36a-2 of the Connecticut General Statutes;
  - (G) ensure that consumer and licensee information and records concerning the remote office activity remain accessible and available for regulatory oversight and examination; and
  - (H) establish safeguards and controls concerning personal information and data security at the remote office location consistent with existing requirements at licensed locations and applicable state and federal law, including but not limited to, utilizing a virtual private network (VPN) or comparable system that ensures secure connectivity and requires passwords or other forms of authentication to access records, and ensuring that appropriate security updates, patches or other alterations to the security of all devices used at remote office locations are installed and maintained.
4. General Requirements – Remote office activities shall comply with all applicable requirements under state and federal law, including, but not limited to, Title 36a, the Gramm-Leach-Bliley Act, the Safeguards Rule set forth at 16 CFR Part 314 and Section 36a-701b of the Connecticut General Statutes, and shall be subject to inquiry, investigation and examination by the Commissioner pursuant to Section 36a-17 of the Connecticut General Statutes. If at any time the Commissioner finds that any individual or licensee is violating the requirements of this order or other applicable laws or regulations, the Commissioner may restrict the ability of an individual or licensee to conduct activities from a remote office location pursuant to the provisions of Title 36a.

### **III. EFFECTIVE DATE**

The foregoing **ORDER** shall be effective immediately and remain in effect until modified, superseded or vacated by the Commissioner or other lawful authority.

Dated at Hartford, Connecticut,  
this 1st day of July 2021.

  
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Jorge L. Perez  
Banking Commissioner