



**STATE OF NEVADA
DEPARTMENT OF BUSINESS AND INDUSTRY
FINANCIAL INSTITUTIONS DIVISION**

DATE: March 13, 2020

TO: Deferred Deposit Lender, High-Interest Lender, Installment Lender (NRS 675) and Collection Agency Licensees and Registrants

FROM: Sandy O’Laughlin, Commissioner

RE: Temporary Guidance Regarding Working from Home

Purpose:

On March 12, 2020, Governor Steve Sisolak declared a state of emergency for Nevada regarding the coronavirus (COVID-19) outbreak. Accordingly, the Nevada Financial Institutions Division (“NFID”) is issuing this Temporary Guidance (“Guidance”) to address the COVID-19 outbreak.

Due to the COVID-19 outbreak and related concerns pertaining to person-to-person or community spread of the virus, the NFID is offering the following guidance for licensees, registrants, and their employees, **and their ability to work temporarily from their residence, even if the residence is not a location licensed with NFID.**

This Guidance is issued with the intent to offer licensees and registrants the ability to take precautions deemed necessary to avoid the risk of exposure or to comply with requirements of voluntary or mandated quarantines and is effective through **May 31, 2020**, unless otherwise modified or withdrawn at the discretion of the Commissioner.

This Guidance does not amend current Nevada Revised Statutes (“NRS”) or Nevada Administrative Code (“NAC”) and does not create new statutory framework. All licensees and registrants must comply with the applicable NRS, NAC, and other state and federal laws and regulations, which includes establishing and maintaining proper security protocols to ensure maximum data, records and transaction security.

The Department’s Guidance – Effective through May 31, 2020:

1. Data security requirements include provisions for the employee to access the company’s secured system from any out-of-office device the licensee or registrant 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;
 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.

Questions regarding this Temporary Guidance may be directed to fidmaster@fid.state.nv.us, or to (702) 486-4120.