# Response to Public Comment

## Proposed 2027 Testing and Education Fee Changes

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# Response to Public Comments Proposed 2027 Testing & Education Fee Changes

Between May 26, 2026, and July 10, 2026, on behalf of the NMLS Policy Committee[1] and the State Regulatory Registry LLC[2] (SRR) Board of Managers, the Conference of State Bank Supervisors[3] (CSBS) invited comments and feedback on proposed changes to the Nationwide Multistate Licensing System and Registry (NMLS or System) testing and education fee structure.

## Goals

The goal of the fee review is to ensure the financial health of the testing and education program against rising operational costs associated with the maintenance and delivery of the SAFE MLO test, including test approvals and integrity management of the program.

The Secure and Fair Enforcement for Mortgage Licensing Act of 2008 (SAFE Act) mandates that (1) "pre-licensing education courses shall be reviewed and approved by NMLS[4] and (2) the required written test for licensure shall be "developed by NMLS and administered by an approved test provider."[5]

Test enrollment fees have changed over time to coincide with changes to the product (i.e., consolidation of the National Test and 50 individual state tests to the Uniform State Test). Testing and education fees have not been increased to account for growth in operational and technology costs since the testing and education program was launched in 2009.

NMLS processing fees were reviewed in 2024, and B2B subscription fees were reviewed in 2025. In keeping with this cycle, the mortgage testing and education fees, last reviewed at the program's launch in 2009, are due for evaluation in 2026.

## Background

As stated in the NMLS Proposal and Request for Public Comment, NMLS has created value for consumers, financial services companies and professionals, state supervisors, and the U.S. economy over the years.

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[1] Information about the NMLS Policy Committee can be found can be found on the About NMLS page on the Resource Center.
[2] Information about the NMLS Governance and the SRR Board of Managers can be found on the About NMLS page on the Resource Center.
[3] Information about CSBS can be found on its website.
[4] 12 U.S.C. §5104 (c) (2)
[5] 12 U.S.C. §5104 (d) (1)

The SAFE Act states that NMLS may charge reasonable fees to cover the costs of maintaining and providing access to information from NMLS.[6]

Fees associated with the NMLS testing and education program cover the following:

- Processing applications from business entities seeking approval/renewal to deliver education to the mortgage industry.
- Processing approval/renewal of applications for pre-licensure and continuing education courses as required by the SAFE Act.
- Processing course completions within NMLS for the purpose of ensuring licensing requirements.
- Developing and maintaining the SAFE MLO Test.
- Administering the test through a nationwide network of secure test centers.
- Administrative services, including copyright and security protections.

Since 2009, NMLS education program fees have remained unchanged. Testing program fees have been adjusted to coincide with the streamlining of the testing program from multiple tests to one.

## The Proposal

The following NMLS testing and education fee changes were proposed for implementation in 2027 and would apply to all mortgage applicants and licensees in NMLS.

**Education Fees Proposal**

No change is being proposed to the course provider and course approval application fees.

Effective Jan. 1, 2027, the credit banking fee will increase from $1.50 an hour to $1.55 an hour. This represents a 3% increase. This will impact all MLOs.

**Testing Fees Proposal**

Effective March 1, 2027, the SAFE MLO Test Enrollment fee will increase from $110 to $120. This represents a 9% increase. This will only affect MLOs that are new to the industry, or MLOs that need to retake a test.

[6] 12 U.S.C. § 5109.

The proposal encouraged general comments, but also posed specific questions for industry:

1. Do you anticipate these fee changes affecting staffing plans for your company?
2. Does your company pay testing and/or education fees on behalf of MLOs?
    a. If yes, will this fee change affect whether you pay testing and/or education fees for your company's MLOs?
3. Does your company pay testing and/or education fees on behalf of non-MLO employees/contractors?
    a. If yes, will this fee change affect whether you pay testing and/or education fees for your company's non-MLO employees or contractors?

The proposal also posed optional industry questions to help CSBS understand the size of a company respondent, providing additional helpful context for the associated comments.

## Summary of Comments

Nine responses to the proposal were received, including responses from AARMR and the MBA. Of the nine respondents, six provided general comments. Exhibit A contains a summary of the general comments received.[7]

Most respondents were supportive of the proposed fee change and provided short comments:

- We have no concerns with the proposed increase of $0.05 to the credit banking fee or the proposed increase of $10.00 to the SAFE MLO test fee.
- Overall, we believe the proposed fee adjustments appear reasonable, measured, and justified given the significant increase in operating costs and inflation since implementation of the Uniform State Content Test in 2013. The proposed increases are modest compared to the approximately 41% inflationary increase over that same period and demonstrate an effort by the SRR Board of Managers and CSBS to balance operational sustainability with affordability for mortgage applicants, licensees, and education providers.
- [Respondent] recognizes and appreciates the transparency and justification provided in the proposed testing and education fee increases. Considering the approach taken for each fee increase, this last fee increase has been received as a nominal request and something [Respondent]members accept going forward.

One respondent stated the fees should stay the same until the end of 2027.

[7] The response documents can be found are on the Proposals for Comment page on the Resource Center.

The proposal also included specific questions as to whether the proposed fee change would affect staffing plans and whether it would affect whether companies continue to pay testing and education fees for their MLOs. The respondents that answered these questions all said it would not affect their staffing plans and their current practice of paying these fees.

## Analysis

Given the lack of opposition to the proposal, CSBS will recommend that the SRR Board of Managers approve the fee changes as proposed.

Below is the anticipated timeline for further consideration of the fee review proposal:

| Anticipated Timeframe | Milestone |
|---|---|
| August 2026 | NMLS Policy Committee to Approval Response to the Fee Change Proposal. |
| September 2026 | Seek SRR BOM approval of the fee change. |
| November 2026 | Seek SRR BOM approval of the 2027 budget which will include proposed fee changes. |
| December 2026 | Seek CSBS Board approval of the 2027 budget which will include proposed fee changes. |
| January 1, 2027 | If approved, the education fee change will take effect. |
| March 1, 2027 | If approved, the testing fee change will take effect. |

The results of the SRR Board of Managers and CSBS Board votes will be published as a News Item on the NMLS Resource Center as soon as practical following the respective votes.

If approved, there will be extensive communication about the fee change.

## Exhibit A

| Respondent | Comments |
|---|---|
| AARMR | The AARMR Board had no concerns with the proposed increase of $0.05 to the credit banking fee or the proposed increase of $10.00 to the SAFE MLO test fee. |
| Brokers School | The Credit Bank Fee affects the schools not the MLO. We (the school) pay this not the student.<br>Also it would sure be nice to have access to this database especially since we have been paying for it for 18 years! |
| Champions School of Real Estate | Overall, we believe the proposed fee adjustments appear reasonable, measured, and justified given the significant increase in operating costs and inflation since implementation of the Uniform State Content Test in 2013.<br><br>The proposed increases are modest compared to the approximately 41% inflationary increase over that same period and demonstrate an effort by the SRR Board of Managers and CSBS to balance operational sustainability with affordability for mortgage applicants, licensees, and education providers.<br><br>Specifically, the proposed increase in the credit banking fee from $1.50 to $1.55 per hour represents only a minimal impact on mortgage loan originators and education providers. Likewise, the proposed SAFE MLO Test Enrollment fee increase from $110 to $120 remains within what we would consider a reasonable range for individuals entering the mortgage industry or retaking the examination.<br><br>Champions School of Real Estate also appreciates that no increases are being proposed to course provider or course approval application fees at this time. Maintaining stability in these areas helps education providers continue developing and delivering high quality SAFE education programs while minimizing additional costs that could ultimately impact students. |

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|---|---|
| | As one of the nation's long-standing providers of mortgage education, we support continued investment in the NMLS platform, testing integrity, regulatory oversight, and system enhancements that benefit regulators, licensees, course providers, and consumers alike. We encourage NMLS to continue maintaining transparency regarding future fee structures and to remain mindful of the financial burden placed on new entrants into the mortgage industry. |
| Mortgage Bankers Association | MBA thanks CSBS and the SRR for the phased approach and timeline provided at the front end of the fee increase implementation process. Additionally, MBA recognizes and appreciates the transparency and justification provided in the proposed testing and education fee increases. Considering the approach taken for each fee increase, this last fee increase has been received as a nominal request and something MBA members accept going forward. |
| Nebraska Department of Banking and Finance | As a general comment, the Department would like to note its approval of the Proposal in order to support the costs of managing the system and administering SAFE Act requirements.<br><br>To ensure ongoing quality and integrity of the program, the Nebraska Department of Banking and Finance supports these modest fee changes. It is imperative that the SAFE Act be administered in an effective and efficient manner and the Department supports the increase in fees to achieve this goal. |
| Real Estate Education Center | Fees should remain the same until end of 2027. Increases will surely deter some from taking the course and exam. |