NATIONWIDE MULTISTATE LICENSING SYSTEM & REGISTRY

nmls.org

Comments Received on Proposed2027 Testing and Education Fee Changes

July 10, 2026

Comments Received on 2027 Testing and Education Fee Changes

On behalf of the State Regulatory Registry LLC ("SRR") Board of Managers[1] and the NMLS Policy Committee,[2] 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. CSBS received nine responses to its Request for Comment. Once a review is completed, a detailed response will be posted.

Click here to view the proposal.

Click on the organization name below to review their comments on the proposal.

Acrisure Mortgage
American Association of Residential Mortgage Regulators (AARMR)
Brokers School
Champions School of Real Estate
DHI Mortgage
Mortgage Bankers Association (MBA)
Nebraska Department of Banking and Finance
Real Estate Education Center
United Wholesale Mortgage

[1] Information about NMLS Governance and the SRR Board of Managers can be found on the Resource Center.
[2] Information about the NMLS Policy Committee can be found on the About NMLS page on the Resource Center.
[3] Information about CSBS can be found on its website.

Janine Bjorn

From: Jennifer Green <jgreen@acrisuremortgage.com>
Sent: Friday, May 29, 2026 2:44 PM
To: Comments
Subject: [External] Proposed 2027 Testing and Education Fee Changes

You don't often get email from jgreen@acrisuremortgage.com. Learn why this is important

1. Do you anticipate these fee changes affecting staffing plans for your company? NO

2. Does your company pay testing and/or education fees on behalf of MLOs? SOME EDUCATIONAL FEES; we do not pay the testing fee.
 a. If yes, will this fee change affect whether you pay testing and/or education fees for your company's MLOs? NO

3. Does your company pay testing and/or education fees on behalf of non-MLO employees/contractors? NO
 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?

Optional Industry Questions: To better understand your company's comments on the proposal, please include the following information in your response.
4. In how many states is your company licensed or registered? 49

5. Does your company employ ten or fewer employees? NO
6. Does your company employ ten or fewer MLOs? NO

ACRISURE® MORTGAGE

Jennifer Green | Licensing Manager

Direct: 407-232-6136
Office: 866-413-2563 x1069
jgreen@acrisuremortgage.com
189 S. Orange Ave Suite 970, Orlando, FL 32801

APPLY NOW

Janine Bjorn

From: ANDERSON Kirsten L * DCBS <Kirsten.L.ANDERSON@dcbs.oregon.gov>
Sent: Tuesday, June 2, 2026 4:33 PM
To: Comments
Cc: David Saunders; Chris Romano
Subject: [External] Request for Public Comments: Proposed Changes to Testing and Education Fees

The Board of the American Association of Residential Mortgage Regulators (AARMR) appreciates the opportunity to review the proposed changes to the fees associated with the SAFE Act mortgage testing and education program, which have not changed since 2009. 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.

Kirsten Anderson
President of AARMR

Janine Bjorn

From: Jim Montrym <brokerschool2@gmail.com>
Sent: Friday, June 5, 2026 9:12 PM
To: Comments
Subject: [External] Credit Bank Fees

[You don't often get email from brokerschool2@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

PS The Credit Bank Fee affects the School's not the MLO. We(the school) pay this not the student.
Also it would sure be nice to have access to this data base especially since we have been paying for it for 18 years!
Sent from my iPhone

Janine Bjorn

From: Paul St. Amand <paul@championsschool.com>
Sent: Thursday, June 4, 2026 4:50 PM
To: Comments
Cc: Kim Dydalewicz; Rita Santamaria
Subject: [External] Proposed changes to the Testing and Education Fees

> You don't often get email from paul@championsschool.com. Learn why this is important

Champions School of Real Estate appreciates the opportunity to provide comments regarding the proposed changes to the Nationwide Multistate Licensing System and Registry (NMLS) testing and education fee structure.

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.

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.

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.

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.

Thank you for the opportunity to provide feedback on these proposed changes.

Paul St. Amand
Director of Mortgage Lending Education

7302 N Grand Parkway W
Spring, TX 77379
Main: 281-893-4484 Cell: 713-858-4085

CHAMPIONS SCHOOL OF REAL ESTATE

Janine Bjorn

From:	Allyson D Harr <ADHarr@dhimortgage.com>
Sent:	Thursday, June 25, 2026 9:51 AM
To:	Comments
Subject:	[External] Proposed 2027 NMLS Testing and Education Fee Changes

You don't often get email from adharr@dhimortgage.com. Learn why this is important

Good morning,
I am writing to provide comments on the proposed testing and education fee changes.

1. Do you anticipate these fee changes affecting staffing plans for your company? No, I don't anticipate these changes will affect staffing plans for our company.
2. Does your company pay testing and/or education fees on behalf of MLOs? Yes, our company pays for testing and education fees on behalf of our MLOs. The changes won't affect whether we pay testing and education fees for our company's MLOs.
3. Does your company pay testing and/or education fees on behalf of non-MLO employees/contractors? We don't have contractors, but we do have individuals in non-MLO positions who are licensed. I don't anticipate these changes affecting whether we pay testing and/or education fees for these employees.
4. In how many states is your company licensed or registered? 38
5. Does your company employ ten or fewer employees? No
6. Does your company employ ten or fewer MLOs? No

Thank you,

Allyson Harr
Licensing Manager

DHI MORTGAGE
Company NMLS #14622,
10700 Pecan Park Blvd Ste 450, Austin, TX 78750
o: 512-219-3414 **m**: 512-202-5843
f: 800-605-0256 DRHNet: 83414
http://www.dhimortgage.com

MORTGAGE BANKERS ASSOCIATION

July 6, 2026

Commissioner Rhoshunda G. Kelly, CEM
Chair, Board of Directors
Conference of State Bank Supervisors

Director Charlie Clark
Chair, Board of Managers
State Regulatory Registry, LLC

C/O Conference of State Bank Supervisors
1300 I St NW
Suite 700 East
Washington, DC 20005
comments@csbs.org

Subject: Proposed 2027 NMLS Fee Changes

Dear Commissioner Kelly and Director Clark,

The Mortgage Bankers Association (MBA)[1] appreciates the opportunity to provide comments to the Conference of State Bank Supervisors (CSBS) and State Regulatory Registry, LLC (SRR) in response to the Nationwide Multistate Licensing System (NMLS) Proposed 2027 Testing and Education Fee Changes.[2]

First and foremost, 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.

Given that the justification for the fee adjustments is partially attributable to the broader NMLS modernization process, MBA would like to take this opportunity to share member

[1]The Mortgage Bankers Association (MBA) is the national association representing the real estate finance industry, an industry that employs more than 275,000 people in virtually every community in the country. Headquartered in Washington, D.C., the association works to ensure the continued strength of the nation's residential and commercial real estate markets, to expand homeownership, and to extend access to affordable housing to all Americans. MBA promotes fair and ethical lending practices and fosters professional excellence among real estate finance employees through a wide range of educational programs and a variety of publications. Its membership of more than 2,000 companies includes all elements of real estate finance: independent mortgage banks, mortgage brokers, commercial banks, thrifts, REITs, Wall Street conduits, life insurance companies, credit unions, and others in the mortgage lending field. For additional information, visit MBA's website: www.mba.org.
[2]https://mortgage.nationwidelicensingsystem.org/knowledge/Products/nmls/aboutNMLS/ProposalsForComment/Testing%20and%20Education%20Fee%20Proposal.pdf

feedback on a few items that could improve the industry and regulator experience within the system as a component of the broader modernization efforts planned in future phases. Recommendations shared by members include:

- Streamlined Sponsorship Submission Process: Currently, after submitting a filing, users must exit the filing and perform a separate search to locate the individual record in order to add sponsorship. MBA recommends implementing a direct "Add Sponsorship" prompt immediately after the filing is submitted. MBA understands that the filing must be submitted before sponsorship can be added; this enhancement would simply allow users to transition seamlessly from filing submission to sponsorship processing without having to navigate back through multiple search screens.

- Improvements to Communication Around Licensing Items: Today, the State Examination System (SES) has an excellent communication process, allowing examiners and licensees to easily communicate regarding requests. Unfortunately, many members have expressed difficulty with the licensing side, where licensees and regulators must rely on email outside the system to notify when a new document has been posted, confirm that a response has been received, or locate an uploaded file. MBA recommends improvements to this communication process to align with the SES communication capabilities as closely as possible.

- Qualified Individual (QI) Designation by License: MU1 records could be enhanced to allow licensees to designate a Qualified Individual (QI) not just by state, but by specific license type within a state. Several states require a separate servicing and/or collections QI, distinct from the originations QI; however, current NMLS functionality in the MU1 does not accommodate this distinction. As a result, it is not clear why a licensee has two associated QIs in one state (e.g., New York) and which is responsible for each license type. This could function similarly to the recently implemented remote work process, in which an individual designates the licenses they are working under remotely.

- Providing New Field to Designate Team Names: Finally, MBA understands that the use of "team names" has previously been considered but largely declined for action. However, more of the industry continues to adopt team names without a clear strategy for entering this information into the system or for how state regulators should evaluate team names versus "doing business as" (DBA) designations. MBA encourages renewed consideration of this issue, given its increasing relevance to the industry. This could include a field similar to the “Other Names” or “Prior Names” fields used in the individual records. MBA also urges the NMLS Policy Committee to develop standardized guidance on what distinguishes a team name from a DBA and how licensees are expected to advertise with or otherwise use these names.

MBA again thanks NMLS and the SRR for the thoughtful, phased, and transparent approach to these proposed testing and education fee increases. MBA and its members hope to partner with NMLS and regulators on future improvements to the system. Should you have any questions, please reach out to William Kooper, wkooper@mba.org or Liz Facemire, lfacemire@mba.org.

Sincerely,

Pete Mills
Senior Vice President
Residential Policy and Strategic Industry Engagement
Mortgage Bankers Association

June 15, 2026

Conference of State Bank Supervisors
Attn: Rich Madison, Senior Vice President, NMLS Policy Mortgage Testing & Education Programs
1300 I Street NW, Suite 700 East
Washington DC 20005
comments@csbs.org

Re: Comments on Proposed Changes to Testing and Education Fees

Mr. Madison,

Please allow this correspondence to serve as the comment from the Nebraska Department of Banking and Finance ("Department") to CSBS's Proposed update to the proposed changes to testing and education fees ("Proposal"). 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.

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.

We appreciate CSBS providing the state agencies with the ability to comment and provide feedback. If you have any questions regarding the Department's comments or would like any further discussion or clarification, please feel free to contact me. I can be reached by email at bryce.miller@nebraska.gov or by phone at 402-471-2171.

Sincerely,

Bryce Miller
Consumer Finance Counsel

Janine Bjorn

From: Angel Lovan <angel@reedc.com>
Sent: Tuesday, June 2, 2026 1:49 PM
To: Comments
Subject: [External] Proposed changed fees

You don't often get email from angel@reedc.com. Learn why this is important

Fees should remain the same until end of 2027. Increases will surely deter some from taking the course and exam.

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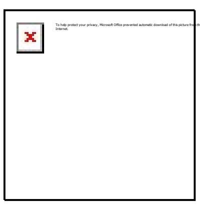
Regards,
Angelique Lovan
Real Estate Education Center &
Center for Insurance Careers
New York, NY 10018
212 465-1008 ext. 403
212 967-7508 ext. 112



Janine Bjorn

From: Patty D'Pulos <pdpulos@uwm.com>
Sent: Wednesday, July 1, 2026 11:12 AM
To: Comments
Subject: [External] Testing and Fee Proposal comments

You don't often get email from pdpulos@uwm.com. Learn why this is important

Good morning,

Below is our input on the new proposed testing and fees.

1. Do you anticipate these fess changes affecting staffing plans for your company? ***No, not at all.***

2. Does your company pay for testing and/or education fess on behalf of MLOs? ***Yes, we do.***
   A. If yes, will this fee change affect whether you pay testing and/or education fees for your company's MLOs? ***No, this will not affect our current policy.***

3. Does your company pay testing and/or education fees on behalf of non-MLO employees/contractors? ***No, we do not pay for non-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?

4. In how many states is your company licensed or registered? ***50 states, including D.C.***

5. Does your company employ ten or fewer employees? ***No***

6. Does your company employ ten or fewer MLOs? ***No***

Thank you,
Patty D'Pulos
Director of Licensing
Ph. 800-981-8898 x83127

UWM UNITED WHOLESALE MORTGAGE

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