



Internal Use Only

NATIONWIDE MULTISTATE LICENSING SYSTEM & REGISTRY

 nmls.org

# Proposed 2027 Testing and Education Fee Changes

## NMLS Proposal

May 26, 2026 – July 10, 2026





## Table of Contents

Introduction and Goals.....	3
Background .....	3
Proposed Fee Changes .....	5
Comment Process .....	6



## Public Comment on Proposed NMLS Testing and Education Fee Changes

On behalf of the State Regulatory Registry LLC (“SRR”) Board of Managers<sup>1</sup> and the NMLS Policy Committee,<sup>2</sup> the Conference of State Bank Supervisors<sup>3</sup> (“CSBS”) invites comments and feedback on proposed changes to the Nationwide Multistate Licensing System and Registry (“NMLS” or “System”) testing and education fee structure.

### Goals

The Secure and Fair Enforcement for Mortgage Licensing Act of 2008 (“*The Safe Act*”) mandates that (1) “pre-licensing education courses shall be reviewed and approved by the Nationwide Mortgage Licensing System and Registry [NMLS]”<sup>4</sup> and (2) the required written test for licensure shall be “developed by the Nationwide Mortgage Licensing System and Registry [NMLS] and administered by an approved test provider.”<sup>5</sup>

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.

System 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 now due for evaluation.

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.

## Background

NMLS has created value for consumers, financial services companies and professionals, and the U.S. economy.

- NMLS’s facilitation of the licensing requirements under the *SAFE Act*,<sup>6</sup> and uniform state adoption of those licensing standards have increased professionalism, accountability, and integrity in mortgage lending.

---

<sup>1</sup> Information about NMLS Governance and the SRR Board of Managers can be found [here](#).

<sup>2</sup> Information about the NMLS Policy Committee can be found on the [About NMLS](#) page on the Resource Center.

<sup>3</sup> Information about CSBS can be found on its [website](#).

<sup>4</sup> 12 U.S.C. §5104 (c) (2)

<sup>5</sup> 12 U.S.C. §5104 (d) (1)

<sup>6</sup> 12 U.S.C. § 5101 *et seq.*



- NMLS has significantly reduced the administrative burden on industry professionals and state regulators by creating a single point of entry and introducing common standards for engaging with state agencies leading to more efficient processes for mortgage and non-bank license approvals and renewals.
- NMLS Consumer Access empowers consumers to make informed decisions about the financial companies and professionals they choose to trust.
- NMLS provides a regulatory framework that helps developing industries mature responsibly, increasing consumer choice and supporting economic growth.

The *SAFE Act* states that “the Nationwide Mortgage Licensing System and Registry (NMLS) may charge reasonable fees to cover the costs of maintaining and providing access to information from the Nationwide Mortgage Licensing System and Registry.”<sup>7</sup>

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

- 2009:
  - National Test: \$92
  - 50+ individual state test: \$55
  - Course Provider Application and Renewal Fee: \$400
  - Course Approval Fee: \$300 plus \$20 per credit hour
  - Course Renewal Fee \$ \$200 plus \$20 per credit hour
  - Credit Banking Fee (reporting course completion into NMLS) \$1.50 per credit hour

---

<sup>7</sup> 12 U.S.C. § 5109.



- 2013:
  - SAFE MLO Test with Uniform State Content (UST) Testing Enrollment Fee implementation: \$110
  - Stand-alone UST added (paid by MLO test takers as applicable): \$33
  - National Test Enrollment Fee eliminated: \$92;
- 2014:
  - Stand-alone UST fee eliminated: \$33.
- 2018:
  - All State Test Component(s) eliminated: \$69 per State Test.

## Proposed 2027 NMLS Testing and Education Fee Changes

The following NMLS testing and education fee changes are proposed for implementation in 2027 and would apply to all mortgage applicants and licensees in NMLS. Since implementation of the Uniform State Content Test in 2013, inflation has increased by approximately 41%. The proposed adjustments are set well below this rate to help ensure fees remain reasonable and proportionate over time. The SRR Board of Managers and CSBS believe the proposed fee increase:

- Reflects a commitment to keep fees as low as possible, consistent with a responsible budget to enhance and sustain NMLS;
- Is well within the SAFE Act’s “reasonable fees” requirement – the proposal is well below the rate of inflation (approximately 41%) since the Uniform State Content Test implementation.

### Education Fees Proposal

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

Effective January 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

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.



## Comment Process

The SRR Board of Managers has approved the proposed NMLS testing and education fee changes for regulator and public comment. The proposal was also reviewed and authorized<sup>8</sup> for a regulator and public comment period by the NMLS Policy Committee.

CSBS invites comments from all members of the public and state agencies. The NMLS Policy Committee will review and evaluate any recommended changes or additions to the proposal and refer them to the SRR Board of Managers for consideration. The CSBS Board of Directors will provide final decisions regarding any recommended fee changes.

When providing feedback, state agencies, companies, and other organizations should submit one response that represents an entity's comments, feedback, and views on the proposal. Submissions must include the submitter's contact information.

Comments from industry members, trade associations, or the public, including the submitter's name and organization's name, will be posted on the NMLS Resource Center. Comments received from a state agency will be posted on the [Regulator-only section](#) of the NMLS Resource Center.

Comments should be emailed to [comments@csbs.org](mailto:comments@csbs.org).

### **Comment submission deadline: July 10, 2026**

CSBS is particularly interested in receiving input on the following questions from the 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?

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?

---

<sup>8</sup> [NMLS Public Comment Policy](#).



5. Does your company employ ten or fewer employees?
6. Does your company employ ten or fewer MLOs?