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

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[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:

- <u>Streamlined Sponsorship Submission Process:</u> 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.

- <u>Improvements to Communication Around Licensing Items</u>: 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.

- <u>Qualified Individual (QI) Designation by License:</u> 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.

- <u>Providing New Field to Designate Team Names</u>: 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