



Notice on 2020 Late CE Course Catalog

9/3/2019

Purpose

The purpose of this notice is to inform course providers that between October 1 and November 15, 2019 NMLS will accept applications to have already NMLS approved continuing education (CE) courses designated for the 2020 Late CE Course Catalog. Late CE courses are those courses that an MLO is required to complete to make-up a CE requirement during the 60-day reinstatement period following the annual licensure renewal period. Additionally, and in accordance with the Model State Law, an MLO who subsequently becomes unlicensed must complete the CE for the last year in which a license was held prior to the issuance of a new or renewed license. Late CE courses are the only courses which may be completed to satisfy this requirement.

Background and Reason for the Notice

The Model State Law, which a majority of states adopted when passing their own SAFE Act legislation, contains a provision allowing for a reinstatement period that follows the annual licensure renewal period (November 1 through December 31). During the reinstatement period, which runs from January 1 through February 28, and under certain conditions, a state may allow an MLO to satisfy specific licensure requirements for the previous year so that the license may be renewed or maintained (meaning an MLO can complete a course on January 15, 2020 and have it count retroactively to the year 2019). Additionally, and in accordance with the Model State Law and the uniform CE policy, an MLO who subsequently becomes unlicensed must complete the CE for the last year in which a license was held to the issuance of a new or renewed license. Late CE courses are the only courses which may be completed to satisfy this requirement.

NMLS will recognize a reinstatement period that will run from January 1 to February 29, 2020. During the reinstatement period, MLOs who had a requirement for but did not complete CE in 2019 will be allowed to take and complete CE courses made available through the NMLS Late CE Course Catalog. Late CE courses are configured such that course credit will be retroactively applied to a previous year. States which do not allow an MLO to make up a CE deficiency require the MLO to apply for a new license. The application process for a new license requires the MLO to satisfy any CE deficiency for the last year in which they maintained an active license. These MLOs will also take a Late CE course.

Late CE courses are the only courses an MLO will be allowed to take to make-up a CE requirement; a state regulator will be able to identify which course has been retroactively credit banked by looking at the course title which will contain the prefix Late CE and will note the difference between the course completion date and the credit banking processing date.

IMPORTANT HIGHLIGHTS

- Courses submitted for Late CE must be a duplicate of a currently approved CE course. The currently approved CE course being duplicated will be referred to as the “parent”.
- Maintaining the NMLS approval of the “parent” course is no longer a requirement to maintain Late CE course approval.
- New application period for entry into the Late CE catalog begins October 1 and ends November 15, 2019.
- Renewal application period for currently approved Late CE courses begins November 1 and ends November 15, 2019.
- Use the Late CE naming convention and course description when submitting the application.
- Credit banking is completed by the course provider using the normal credit banking process.
- Course offerings are set up by the course provider using the normal creating course offering process.
- NMLS will automatically apply the credits to 2019 during the reinstatement period; and NMLS staff will apply the credits to the correct year after reinstatement.
- The normal course application fee schedule applies for all new and renewal Late CE course applications.
- All applications will be reviewed and must reach approval for entry into the 2020 Late CE catalog.

Invitation to Course Providers

Course providers with currently approved CE courses are invited to submit courses for inclusion into the catalog. The following details pertain:

- Course providers seeking to have a course included in the Late CE catalog are required to submit the course with the Late CE naming convention between October 1 and November 15, 2019 through the normal application process. The course(s) must be an exact duplicate of an approved CE course. Standard course approval application fees apply (\$300 plus \$20 per credit hour). **Note: there will be no exceptions to the November 15 deadline. Any course submitted for Late CE after November 15 will be denied and the fees will not be refunded.**
- NMLS will accept renewal applications to have a currently approved Late CE course renewed between November 1 and November 15 through the normal renewal application process. The existing Late CE course will retain its course ID and title. Standard renewal application fees apply (\$200 plus \$20 per credit hour). **Note: there will be no exceptions to the November 15 deadline. Any Late CE course renewal submitted after November 15 will be denied and the fees will not be refunded.**
- All CE course categories are eligible for entry into the Late CE catalog:
 - 8 Hour Comprehensive
 - 7 Hour Core
 - 3 Hour Federal law and Regulations
 - 2 Hour Ethics
 - 2 Hour Nontraditional
 - 1+ Hour Elective both state-specific and non-state specific courses
- All course formats except Online Instructor-Led (OIL) are eligible for entry into the Late CE catalog.

- All courses submitted for Late CE (both new and renewal) will go through a full review via the normal course review process. The course application must reach an approved status in order to be included in the 2020 Late CE catalog. **Note: Initial reviews take 15-20 business days and frequently require revisions and another review cycle. Allow ample time for the course review process.**
- During the month of December, NMLS will issue the Late CE course ID number for approved applications and will prepare the catalog. The updated catalog with the Late CE courses listed will be made available on January 2, 2020.
- Note that the following states have state-specific CE education requirements and are thus required in the catalog: AZ, CA-DBO, CO, CT, DC, FL, GA, HI, ID, KY, MD, MA, MN, MO, NJ, NM, NY, NC, OR, PA, RI, SC-BFI, SC-DCA, UT-DRE, WA, WV.

Late CE Course Naming Convention and the SAFE Act's CE Successive Year Rule

Courses are required to be titled differently than regular CE courses. **The course naming convention is as follows: the words "Late CE" followed by the approved title of the "parent" course, followed by the "parent" course's approved course ID number in parentheses.** For example: "Late CE 8 Hour KY Comprehensive Mortgage Law Review (1234)."

To address a SAFE Act requirement that the same CE course not be taken two years in a row, the course title will show the "parent" course number at the end of the course title in parentheses. The parent course number is the course ID number of the originally approved course. NMLS will assign the Late CE course a new course number; this number will be the "child" number of the parent and is the number that will appear in the course catalog and on the MLO's course completion record. MLOs cannot take the same course two years in a row, so if the student took the parent course in 2018, he or she cannot take the Late CE for 2019. Conversely, if the MLO takes the Late CE course, he or she cannot take the parent course to satisfy 2020 requirements. An MLO cannot take the same Late CE course two years in a row.

Course Offerings and Credit Banking

The course provider will credit bank using the normal process for credit banking. The credit banking fee for Late CE remains the same at \$1.50 per credit hour per person. The course provider will create course offerings using the normal process for creating course offerings.

Late CE credits are not automatically applied to students' records like regular CE. NMLS will receive notification when credits have been reported for a Late CE course, and NMLS staff will manually apply the credits to the appropriate year one by one.