



Notice on 2019 Late CE Course Catalog

9/7/2018

Purpose

The purpose of this notice is to inform course providers that between October 1 and November 30, 2018 NMLS will accept applications to have already NMLS approved continuing education (CE) courses designated for the 2019 Late CE Course Catalog. Late CE courses are those courses that an MLO is allowed to take 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 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 many 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 Jan 1 through Feb 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 take a course on January 15, 2018 and have it count retroactively to the year 2016). 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 28, 2019. During the reinstatement period, MLOs who had a requirement for but did not complete CE in 2018 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

- Any currently approved CE course can be submitted for the Late CE designation.
- Currently active Late CE courses may be renewed between December 1-15 for entry into the 2019 Late CE catalog, so long as the "parent" course is active and in good standing.

- Application period for entry into the Late CE catalog begins October 1 and ends November 30.
- Use the Late CE naming convention and course description when submitting the application
- Select the same category as the parent course 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 2018 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.
- Courses must be NMLS approved on or before October 31, 2018 to be eligible for the 2019 Late CE catalog.

Invitation to Course Providers

In order to populate the NMLS Late CE Catalog with courses approved for the “Late CE” catalog, NMLS is inviting course providers with currently approved CE courses 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 30, 2018. The course(s) must be an exact duplicate of an approved CE course. **Note: there will be no exceptions to the November 30 deadline. Any course submitted for Late CE after November 30 will be denied and the fees will not be refunded.**
- Course must be NMLS approved before it can be submitted for the Late CE catalog. The last day the “parent” course can be approved and eligible for the Late CE catalog is October 31, 2018. **Note: there will be no exceptions to the October 31 deadline. Initial reviews take 15-20 business days and frequently require revisions and another review cycle. Allow ample time for the course review process.**
- Applications to have a course considered for the Late CE catalog are to be submitted via the normal course approval application process. Standard course approval application fees apply (\$300 plus \$20 per credit hour).
- 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.
- NMLS will accept renewal applications to have a currently approved Late CE course renewed. To have a course currently approved under the Late CE category renewed, the “Parent” course must be active and in good standing and existing course content must be current. The existing Late CE course will retain its course ID and title.

- Renewal applications are to be submitted via the normal course renewal process no later than December 15, 2018. Standard renewal application fees apply (\$200 plus \$20 per credit hour). **Note: there will be no exceptions to the December 15 deadline. Any renewal submitted for Late CE after December 15 will be denied and the fees will not be refunded.**
- Any updates in the “parent” course must also be carried over to the “Late CE” course. Providers are required to ensure Late CE course content is current and that the course functions properly.
- During the month of December, NMLS will verify that the course is a duplicate of the previously approved course, assign the Late CE course ID number, and prepare the course for the catalog. The updated catalog with the Late CE courses listed will be made available on January 2, 2019.
- The Late CE courses will be valid for one year so long as the parent course maintains an approved status. MLOs seeking to make up CE credit for 2018, 2017, 2016, 2015, 2014, 2013, 2012, 2011, or 2010 will only be allowed to take these courses.
- 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, 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 12 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 2015, he or she cannot take the Late CE for 2016. Conversely, if the MLO takes the Late CE course, he or she cannot take the parent course to satisfy 2018 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.

During the reinstatement period (January 1 – February 28, 2019), credits will be automatically applied to 2018. After the reinstatement period, NMLS will receive notification when credits have been reported for a Late CE course, and NMLS staff will apply the credits to the appropriate year.