



9575 Katy Freeway, Suite 300

Houston, TX 77024

Phone: 713-871-0005

Fax: 713-871-1358

Thomas E. Black, Jr., P. C. *

Calvin C. Mann, Jr., P. C.

Gregory S. Graham, P. C.

David F. Dulock

Diane M. Gleason

Benjamin R. Idziak **

Shawn P. Black **

Regina M. Uhl

Peter B. Idziak**

Of Counsel

David M. Tritter

** Also Licensed in New York, Washington,
West Virginia and Iowa*

*** Also Licensed in New York*

August 6, 2014

To: Clients and Friends

From: David F. Dulock

Subject: Proposed Pre-Licensure Education Expiration Policy

In a July 23, 2014 proposal ([click here](#)) posted on the NMLS Resource Center website, the State Regulatory Registry LLC, a limited liability company that owns and operates the Nationwide Mortgage Licensing System and Registry (NMLS), proposes to create the following three year pre-licensure education expiration policy:

“An individual who:

- (1) fails to acquire a valid license or federal registration within three years from the date of initial completion of any approved pre-licensure education (PE) course; or
- (2) has obtained a license or federal registration but subsequently did not maintain an active license or federal registration for at least three years,

must complete 20 hours of PE in order to be eligible for state licensure.”

As it presently stands, the various states have different PE expiration policies because the federal SAFE Act does not address a PE expiration period.

The State Regulatory Registry LLC is seeking comments on the proposed pre-licensure education expiration policy, which is fully explained in its proposal hyperlinked to this memorandum. Comments must include the contact information for the person submitting comments and may be submitted by either of the following methods:

1. By email to: comments@csbs.org.
2. In physical form to: State Regulatory Registry, Conference of State Bank Supervisors, Attn: Tim Doyle, Senior Vice President, 1129 20th St NW, 9th Floor, Washington, DC 20036.

The comment submission deadline is August 22, 2014.

This Memorandum is provided as general information in regard to the subject matter covered, but no representations or warranty of the accuracy or reliability of the content of this information are made or implied. Opinions expressed in this memorandum are those of the author alone. In publishing this information, neither the author nor the law firm of Black, Mann & Graham L.L.P. is engaged in rendering legal services. While this information concerns legal and regulatory matters, it is not legal advice and its use creates no attorney-client relationship or any other basis for reliance on the information. Readers should not place reliance on this information alone, but should seek independent legal advice regarding the law applicable to matters of interest or concern to them. The law firm of Black, Mann & Graham L.L.P. expressly disclaims any obligation to keep the content of this information current or free of errors.