



# Maryland Licensing Workgroup



---

Office of Financial Regulation (OFR)



Meeting #2  
December 5, 2025

# Agenda-in-Brief

**December 5, 2025**

- Welcome and Introductions
- Recap of November Meeting
- Discussion on Collection Agency Licensing
- Discussion on Licensing Laws for Consumer and Installment Loan Lending
- Recommendations and Next Steps
- Final Thoughts and Adjourn

***Please be advised that this meeting is being recorded.***

***The recording will be posted online and available to the public.***



---

**Office of Financial Regulation**  
[www.labor.maryland.gov/finance](http://www.labor.maryland.gov/finance)



# Welcome

Tony Salazar, *Commissioner and Chair*

## Introductions

All (Workgroup Members, Staff, and Public Attendees)

## Meeting Recap

Tony Salazar, *Commissioner and Chair*

[November Meeting Summary](#)



# DISCUSSION TOPIC: Collection Agency Licensing Act

Cliff Charland, *Assistant Commissioner, Financial Services Licensing & Supervision*

## GUEST SPEAKERS:

Liam O'Driscoll, *North American Collection Agency Regulatory Association*

Tracy Rezvani, *State Collection Agency Licensing Board*

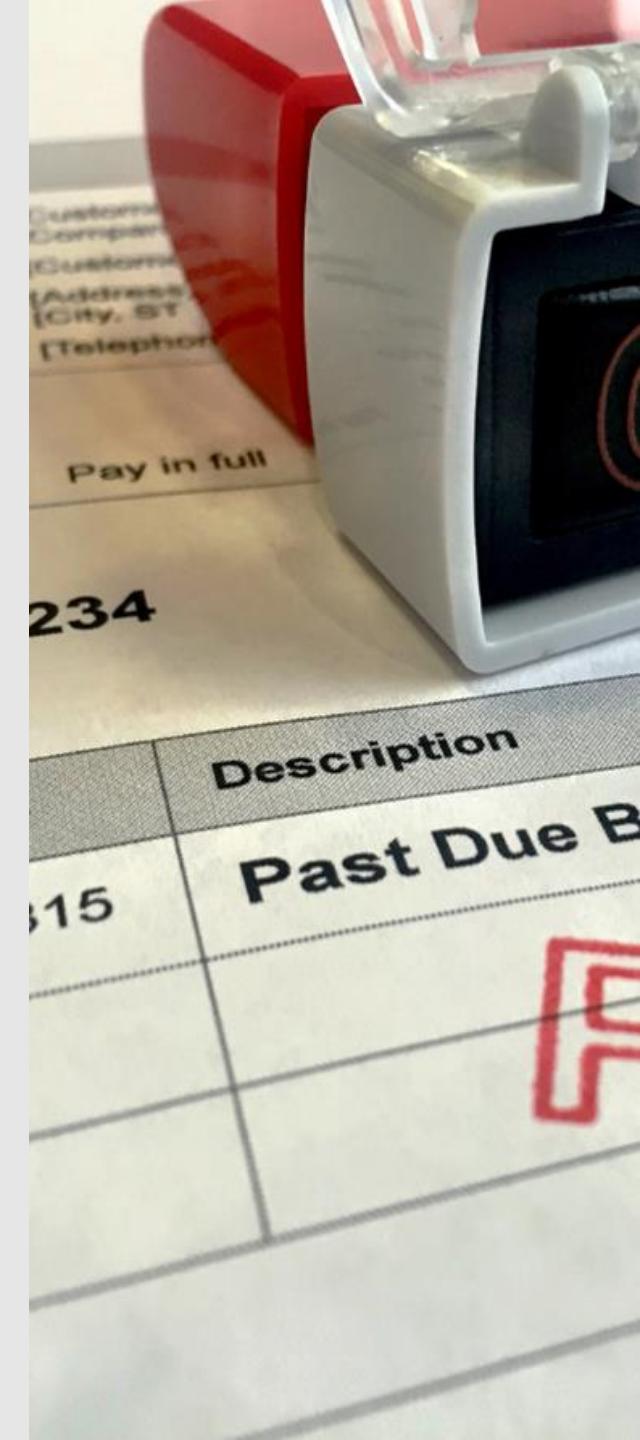
Shawn Kennedy, *State Collection Agency Licensing Board*



# MD Collection Agency Licensing Act

## MD Code, Business Regulation, § 7-101 et seq. (MCALA)

- Collection agency license required for collecting a consumer claim on behalf of another, and is not limited to collectors of delinquent debts.
- Definition of “collection agency” encompasses businesses not traditionally seen as collection agencies, such as property managers collecting rents or HOA/condo fees, water/utility sub-metering, companies handling billing for health clubs, etc.
- Licenses issued by the **State Collection Agency Licensing Board (SCALB)**, established in 1977 and housed within OFR.
  - Comprised of two consumer members, two industry members, and Commissioner as Chair; supported by OFR staff but no dedicated staff.
  - Meets monthly to approve OFR recommendations for licensing applications; receive numerical reports for licensing, complaints and enforcement matters; and discuss emerging policy issues and national landscape.
- SCALB may reprimand, suspend, or revoke a license for violations of law.
  - May issue cease and desist orders or require corrective action.
  - May not impose a monetary penalty, including for unlicensed activity, until a previously-issued order has been violated.



# DISCUSSION TOPIC:

## Consumer Loan Lender and Installment Loan Lender Licenses

Cliff Charland, *Assistant Commissioner, Financial Services Licensing & Supervision*  
Amy Hennen, *Assistant Commissioner, Policy & Engagement*

### GUEST SPEAKERS:

Jedd Bellman, *Orrick*

Gretchen Reimert, *Maryland Office of the Attorney General (Dept. of Labor/OFR)*

Nora Nichols, *Maryland Office of the Attorney General (Consumer Protection Division)*



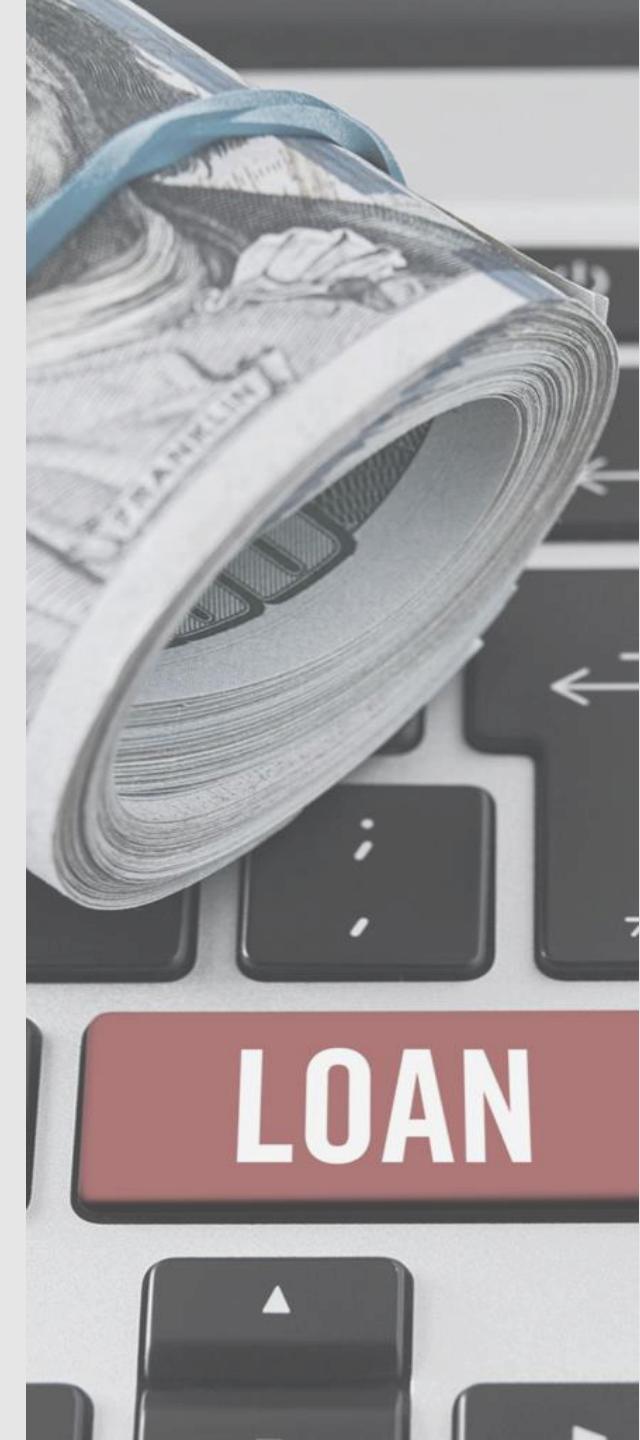
# Consumer Loan Law (CLL) and Installment Loan Law (ILL) Licenses

## MD Code, Financial Institutions, §11-201 et seq. (CLL)

- Loans \$25,000 or less for personal, family, or household use [*Md. Code, Commercial Law, Title 12, Subtitle 3*].
- Banks, credit unions, trust companies, and savings and loans are exempt from licensure.
- Loan of \$25,000 or less presumed to be under CLL unless lender affirmatively elects to make the loan under Subtitles for Interest and Usury, Secondary Mortgage, Credit Grantor Revolving, or Credit Grantor Closed End provisions [*Md. Code, Commercial Law, Title 12, Subtitles 1, 4, 9 or 10*].

## MD Code, Financial Institutions, §11-301 et seq. (ILL)

- Generally, covers consumer loans not governed by CLL (with certain exceptions).
- Banks, credit unions, etc. are exempt from licensure, unless a bank or credit union is chartered by another state *and* does not have a branch in Maryland.
- **CLL licensees are exempt from ILL licensure.**
- **Licensing requirements and fees are identical to CLL.**



# Recommendations and Next Steps

Tony Salazar,  
*Commissioner and Chair*

Workgroup Member Discussion



# Proposed Recommendations

**For the report due December 31, 2025:**

1. The Workgroup will continue meeting through the first half of 2026, in order to allow members to fully analyze issue areas identified by Workgroup members and to develop proposals for legislative consideration, with a goal of producing a supplemental report with findings and recommendations by June 30, 2026.
2. The Legislature should continue to require the use of Nationwide Multistate Licensing System & Registry (NMLS) whenever it seeks to impose licensing or registration requirements on a financial service industry.
3. The Legislature should continue to support the Office of Financial Regulation's use of the State Examination System component of the Nationwide Multistate Licensing System & Registry (NMLS) for the Office's handling of consumer complaints, enforcement actions, and examinations.



# Final Thoughts and Adjourn

Tony Salazar,  
*Commissioner and Chair*

**Next Meeting:**  
January 16<sup>th</sup> 2026, at 10:00am

**Workgroup webpage:**  
[www.labor.maryland.gov/finance/frmdlicensingworkgroup.shtml](http://www.labor.maryland.gov/finance/frmdlicensingworkgroup.shtml)

