



April 6, 2026

Dee Jurius
Executive Director
Office of Professional Licensure and Certification
7 Eagle Square
Concord NH 03301

Executive Director Jurius -

On behalf of the more than 6,500 members of the New Hampshire Association of REALTORS®, I write to express our serious concern with recent actions by the New Hampshire Office of Professional Licensure and Certification which are impeding real estate licensees from practicing their profession and earning a living.

While we recognize and appreciate the staffing and technological challenges currently facing OPLC, the ability of a licensed professional to continue to earn a living should not be curtailed due to administrative delays.

At present, the transfer of a salesperson's license from one brokerage to another takes approximately four to six weeks to complete. During this time, licensees may be left without a managing broker and, as a result, are unable to lawfully engage in real estate activity or serve their clients. This creates unnecessary economic hardship for licensees and disruption for consumers.

OPLC has indicated that Plc 304.06 allows for review of such applications within 30 days, with up to 60 days for processing. We respectfully disagree with this interpretation. Plc 304.06 applies specifically to applications submitted pursuant to Plc 304.01 or Plc 304.02. However, neither provision governs a license transfer between brokerages.

Plc 304.01 applies to individuals seeking initial licensure in New Hampshire or those not "currently licensed in this jurisdiction." By definition, a license transfer involves an individual who is already duly licensed in New Hampshire. Likewise, Plc 304.02 applies solely to military applicants and their families and is not relevant in this context. Accordingly, we do not believe Plc 304.06 provides a basis for extended processing timelines for license transfers.

Even OPLC's stated goal of processing transfers within 14 days may result in a period during which a licensee is unable to practice. For that reason, NHAR strongly urges OPLC and the New

Hampshire Real Estate Commission to adopt a system whereby license transfers are deemed effective upon submission. This “notice-based” approach is successfully utilized in other states and ensures continuity of practice while administrative review is completed.

Such a framework would not only protect licensees from unnecessary work interruptions but would also reduce administrative burden on staff by streamlining the process. Given the immediate and ongoing serious impact on licensees, we believe that emergency rulemaking by OPLC or the Real Estate Commission is both appropriate and warranted.

In addition, we are deeply concerned that the new licensing portal developed by Salesforce no longer publicly displays the managing broker associated with a salesperson. This information has long been available and serves as a critical consumer protection tool, allowing members of the public to identify the broker responsible for the supervision of a licensee.

The removal of this information diminishes transparency, undermines consumer protection, and limits a broker’s ability to become aware of and respond to potential issues involving affiliated licensees. It is imperative that this functionality be restored as soon as possible.

NHAR has previously communicated these concerns to both OPLC and the Real Estate Commission, and we stand ready to work collaboratively toward a prompt resolution. However, given the direct impact on licensees’ ability to earn a living and serve their clients, we respectfully request immediate action.

Thank you for your attention to this matter.

Sincerely,

Josh Greenwald

Josh Greenwald
2026 President
New Hampshire Association of REALTORS

Cc: Governor Kelly Ayotte
New Hampshire Attorney General
Sen. Howard Pearl, OPLC Oversight Committee
Sen. Tara Reardon, OPLC Oversight Committee
Rep. Erica Layon, OPLC Oversight Committee
Rep. Jaci Grote, OPLC Oversight Committee
Ralph Valentine, Chair, Real Estate Commission