

Governor's Office of Management and Budget

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Director



Regulatory Sunset Act Study of

The Community Association Manager Licensing and Disciplinary Act

May 8, 2026

**To the Honorable JB Pritzker
Governor of Illinois**

Governor Pritzker:

As required by Section 5 of the Regulatory Sunset Act (5 ILCS 80/1 et seq.), GOMB facilitated a study with the Illinois Department of Financial and Professional Regulation's (IDFPR), the agency responsible for oversight of the Community Association Manager Licensing and Disciplinary Act (225 ILCS 427) (the Act), which is scheduled to be repealed on January 1, 2027. This study provides justification for the recommendation to continue this Act.

GOMB's examination of this Act was conducted considering the factors set out in Sections 6 and 7 of the Regulatory Sunset Act. The following report outlines the work of GOMB's study and details the criteria and data utilized to arrive at the above recommendation.

Respectfully,

Alexis Sturm
Director
Governor's Office of Management and Budget

GOMB Regulatory Sunset Act: Community Association Manager Licensing and Disciplinary Act

The State of Illinois, acting through the Illinois Department of Financial and Professional Regulation (IDFPR or the Department), licenses the profession of Community Association Managers pursuant to the Act. Community Association Management Firms, entities that have direct and substantial control over the operations and monies of condominium and common interest community associations, and which employ Community Association Managers, are also subject to regulation under this Act.

The Department holds licensees accountable to professional standards set forth in the Act and Administrative Rule. Professional regulation is paramount to ensuring that the standard for management of community associations is uniform to protect the property owner's rights. This regulation provides an avenue for the public to file complaints against licensees when there is an accusation of misuse of funds, inappropriate record management, or breach of contract.

Licensure provides professional standards which mitigate direct harm to the welfare and safety of unit owners and residents of community associations. Continued licensing of community association managers enhances public protections by ensuring adequate handling of community association funds, records, and contracts.

Removing regulation would eliminate the professional standards that are critical to the welfare and safety of more than 1.2 million residents of Illinois who reside in condominium and common interest community associations

1. License Count and Fee Structure (5 ILCS 80/6(1) and (3))

As of July 31, 2025, IDFPR states that there are 882 active licenses for Community Association Managers in Illinois. See the following table for the number of licenses issued by IDFPR under this Act in the fiscal years indicated:

License, Credential, Certification Type	FY21	FY22	FY23	FY24	FY25
261-Licensed Community Association Manager	154	163	200	183	182
291-Community Association Management Firm	N/A	N/A	137	153	32

Community Association Managers have the following licensure fee structure:

License, Credential, or Certification Type	Fee Amount	Online Payment Option
261-Licensed Community Association Manager		
Application Fee	\$300	<input checked="" type="checkbox"/>
Renewal Fee	\$300	<input checked="" type="checkbox"/>
Duplicate Fee	\$NA	<input type="checkbox"/>
Examination Fee	\$NA	<input type="checkbox"/>

Late Fee	\$50	<input checked="" type="checkbox"/>
291-Community Association Management Firm		
Application Fee	\$650	<input checked="" type="checkbox"/>
Renewal Fee	\$650	<input checked="" type="checkbox"/>
Duplicate Fee	\$NA	<input type="checkbox"/>
Examination Fee	\$NA	<input type="checkbox"/>
Late/Restoration Fee	\$200	<input checked="" type="checkbox"/>
292- CAM Education Sponsor		
Application Fee	\$100	<input checked="" type="checkbox"/>
Renewal Fee	\$100	<input checked="" type="checkbox"/>
Duplicate Fee	\$NA	<input type="checkbox"/>
Examination Fee	\$NA	<input type="checkbox"/>
Late Fee	\$NA	<input type="checkbox"/>
293-CAM Continuing Education Course		
Application Fee	\$50/credit hour	<input checked="" type="checkbox"/>
Renewal Fee	\$50/credit hour	<input checked="" type="checkbox"/>
Duplicate Fee	\$NA	<input type="checkbox"/>
Examination Fee	\$NA	<input type="checkbox"/>
Late Fee	\$NA	<input type="checkbox"/>

Fees have not increased since the enactment of the Act in 2010.

2. Obtaining Certification in Illinois (5 ILCS 80/6(11))

Applicants for a Community Association Manager license must submit specific application forms to verify requirements for licensure including proof of completion of Pre-License Education, evidence of

passing the licensure exam, and payment of licensure fee. Applicants holding licenses in other jurisdictions may apply through an Endorsement process which includes verification of the certified license history, evidence that the licensure exam was passed, and payment for the licensure fee. Detailed information about the requirements and the exam may be found in the Administrative Code (Ill. Admin. Code tit. 68, § 1445).

Illinois standards for testing and licensure are established in Statute and Administrative Rule. There is no third party responsible for the governance or oversight for this regulated profession.

The licensure examination for the Community Association Manager License is approved by the IDFPR and the examinations are administered by third parties:

- Community Association Managers International Certification Board (CAM-ICB) provides the Certified Manager of Community Associations (CMCA) examination
https://www.irem.org/exams/id-comexm/comexm_community_association_management_exam
- Institute of Real Estate Management (IREM) provides the Community Association Management Exam (COMEXM)

The exam vendors are not involved with the regulation or governance of the industry in Illinois.

3. Equity Concerns (5 ILCS 80/6(10), (12) and (13))

IDFPR states that equity issues may have an impact on individuals seeking to become licensed under the Act in the State of Illinois. The profession requires a high school diploma or its equivalency, 20 hours of pre-license training, an application fee, and a licensure examination. The examination is offered in many locations within Illinois and can be done remotely.

The law permits reasonable accommodations for language, including use of a word-for-word language dictionary and additional time to complete the exam. Criminal convictions will not automatically bar an individual from this profession. IDFPR reports that very few complete applications are denied.

4. Agency recommendations to change the statute (5 ILCS 80/6(4) and (9))

IDFPR does not have amendatory recommendations for this Act. The Department is continuously monitoring the impact the current statutory language has on practitioners, while closely observing what changes can be made to better benefit the public.

5. Agency efforts to comply with enabling laws (5 ILCS 80/6(3), (4) and (5))

At the time of this study, GOMB is not aware of any compliance issues by IDFPR related to the provisions of the Act.

6. Recent bills introduced by the General Assembly (5 ILCS 80/6(9))

According to IDFPR, the regulatory sunset report in 2022 led the Department to add firm licensure to the Act. Since that time, there have been limited technical cleanups and changes related to consistency with other Real Estate Acts.

The following is a list of recently introduced bills by the General Assembly.

P.A. 102-20, eff. 1-1-22; 102-970, eff. 5-27-22; 102-1100, eff. 1-1-23; 103-236, eff. 1-1-24; and 103-616, eff. 7-1-24.

These bills focus on modernizing terminology, refining board governance, and updating administrative processes. The bills adjust demographic language and extend board service limits. The changes streamline licensing procedures and improve regulatory clarity across the program.

7. Stakeholder Feedback and Protocols for Licensure 5 ILCS 80/6(5), (6), (7), (8), (10) and 5 ILCS 80/7)

IDFPR has public board meetings where the Department discusses the status of the Act and the profession. IDFPR also receives and responds to inquiries and feedback received from the public via email and through its website.

When proposing Act or Rule changes, IDFPR reaches out to industry stakeholders for feedback. Additionally, the Department investigates complaints and analyzes information to determine if the Act needs to be modernized to reflect current business practices of the industry. Most of the problems or deficiencies cited are technical in nature and the Department has addressed them over the past years through legislation or rulemaking.

8. Public Outreach (5 ILCS 80/6(5), (6), (7) and (8) and 5 ILCS 80/7)

IDFPR provides multiple avenues for members of the public to contact the Department with comments or concerns about the programs it oversees or the Department's rules governing its programs. IDFPR conducts public outreach efforts through social media and other external-facing means.

Before administrative rules move through the JCAR process, the Department works with the industry and the board to draft and review the rule to minimize concerns that may be raised during the JCAR comment period.

The Department also utilizes public comments when drafting licensing-related Administrative Rules. The stakeholders may have first-hand experience with the Act and its rules, which means suggestions are practical and often lead to more effective or efficient outcomes.

9. Industry Standards (5 ILCS 80/6(11) and (12))

IDFPR states that the Illinois personal qualifications required for this profession are in line with industry standards.

Currently Illinois is one of seven states that have mandatory licensing for community association managers (Alaska, Connecticut, Florida, Georgia, Illinois, Nevada, and Virginia). California has a voluntary process in which a Community Association Manager can become certified. The requirement for licensure in Illinois compared to the other states can be found here:

<https://www.caionline.org/getmedia/5e1886f8-bd09-4574-9b05-fa02ddd1cd94/CAICAMWhitePaperJuly24.pdf>

Midwestern states like Indiana and Ohio do not currently require licensure for Community Association Managers (CAMs), though voluntary certifications like CMCA may be encouraged. For additional details, refer to <https://www.caionline.org/getmedia/5e1886f8-bd09-4574-9b05-fa02ddd1cd94/CAICAMWhitePaperJuly24.pdf>.

Nevada and Virginia require bond coverage or background checks. For more guidance, please see <https://www.camicb.org/recertification/state-specific-requirements/>.

10. Public Complaint Resolution (5 ILCS 80/6(3), (7), (8) and (10) and 5 ILCS 80/7)

IDFPR has received 785 complaints from the public regarding Licensed Community Association Manager over the past five fiscal years. The Advisory Board is responsible for resolving complaints regarding IDFPR's regulation of the Community Association Manager Licensing and Disciplinary Act. The average time for resolution of a complaint is six to twelve months. The table below outlines the number of complaints received by the Department in the last five years.

License, Credentials, or Certifications Type	FY21	FY22	FY23	FY24	FY25
261-Licensed Community Association Manager	134	131	198	178	144
291-Community Association Management Firm	NA	NA	0	60	87
292- CAM Education Sponsor	NA	NA	NA	NA	0
293-CAM Continuing Education Course	NA	NA	NA	NA	0

11. Disciplinary Action (5 ILCS 80/6(14))

IDFPR's authority to enforce the Act ensures that allegations of professional incompetence, gross negligence, malpractice, and unprofessional conduct are investigated and that substantiated allegations receive appropriate discipline including prosecution by the IDFPR, when warranted.

The process begins with receiving a complaint which is then reviewed by the board to determine if it should be sent to investigations. Once an investigation is completed, the case can be closed or referred to prosecution which can result in public or non-public discipline. This process can be achieved through an informal conference, an agreed order, a formal hearing, or a Director's order.

12. Conclusion

The Act governs the licensure of Community Association Managers and Community Association Management Firms in the State of Illinois.

Based on the factors in 5 ILCS 80/6 and the additional criteria in 5 ILCS 80/7, GOMB finds that the Act should be recommended for continuation. The record should expressly state that the public protection benefits of regulation outweigh the regulatory costs and that no less restrictive alternative would adequately address the significant and discernible harms identified in this report.

The Act should be continued to promote and enhance the safety and welfare of the public, without burdening licensees or commerce.