

Draft: 4/22/26

Uniform Education (D) Working Group
Virtual Meeting
April 15, 2026

The Uniform Education (D) Working Group of the Producer Licensing (D) Task Force met April 15, 2026. The following Working Group members participated: Jodie Delgado, Chair (TX); Kayla Erickson, Vice Chair (AK); Charlene Ferguson (CA); Lorelei Brillante (MD); Vanessa C. Miller (MS); Vanessa DeJesus (NM); Lindsey Jones (OH); Tony Dorschner (SD); Shauna Clements and Tony Clayton (VA); and Nicole Rayl (WA).

1. Adopted its Mar. 11 Minutes.

The Working Group met Mar. 11 to discuss its 2026 charges and priorities.

DeJesus made a motion, seconded by Brillante, to adopt the Working Group's Mar. 11 (Attachment XX) minutes. The motion passed unanimously.

2. Discussed the NAIC Standardized Instructor Form

Delgado said the next agenda item regarding the is regarding the NAIC Standardized Instructor Form. She explained the form's development process and asked for comments or questions from the Working Group.

Ward said California would continue using their own instructor form due to regulatory requirements. The Working Group discussed California's form the specific requirements, qualifications, and details.

Delgado said the instructor form would be posted on the Working Group webpage for review and discussed during the May meeting for potential adoption.

3. Discussed the NAIC Continuing Education Reciprocity Agreement - Appendix C

Erickson said the next agenda item is to discuss the CER Agreement Appendix C. Erickson said the Working Group has been reviewing Appendix C for potential edits. She said some questions surround how active participation is verified in group settings and sought input from other states.

Gingras said California requirements for instructors to track individual student sign-ins and sign-outs but noted limited regulation on group settings. The Working Group discussed different requirements that states use to track individuals. Erickson said from the discussions there is a need to clarify terminology regarding monitors and other areas to support the requirements. Vanessa said New Mexico has encountered compliance challenges with group webinar settings and welcomed further discussion.

Delgado questioned whether group settings were permitted and whether the issue was unknowingly occurring. Erickson speculated that regulators might not be aware of such practices due to lack of visibility in roster submissions. Gingras said providers rarely inquire about group webinar offerings, suggesting that the practice could be happening unnoticed.

Delgado proposed clarifying language to ensure each student needs their own login, even in group settings, and questioned whether the group setting exception was necessary. Erickson supported clarifying or eliminating the group setting language, noting there was little impact experienced in Alaska. Delgado said that interpretations

varied and acknowledged the need for clarity describing the practical implications of provider verification in group settings, questioning whether verification codes or sign-in sheets were sufficient.

Delgado said the Working Group discussions prove that clearer definitions are necessary. The Working Group discussed and agreed more editing was needed for this section.

Delgado said in Texas it is left to the providers discretion and subjecting providers to audits if issues arise. The Working Group discussed and agreed that polling questions are a best practice that should be included.

Erickson said the current best practices were being captured and that further wordsmithing will be necessary.

Kilgore said there are concerns about verifying student identity and license numbers, suggesting further clarification on attendance monitoring. The Working Group discussed how states verify student identity for attendance. The Working Group agreed to solicit input from CE providers.

Delgado called for providers to share their processes, and Richard emphasized the importance of understanding provider practices to determine if best practices should be included in guidelines. Delgado agreed and asked for final input before moving on. She confirmed with Maine that their concerns were addressed and thanked them for their comments, noting that such discussions often lead to more questions.

Delgado then reminded everyone that Appendix B comments were due by April 29 and encouraged members to submit any comments for the Working Group to discuss.

4. Discuss CER Form Course Difficulty Levels

Delgado said the next agenda items is concerning the course difficulty levels on the CER form. She said there was an issue raised on the course labeling of “basic” or “intermediate.”

Brillante said the importance of accurately designating difficulty levels based on course content, not just titles, to maintain the integrity of reciprocity reviews and ensure proper credit allocation. She said the CE provider’s responsibility is to determine the audience and difficulty level and suggested that regulators should confirm and follow the provider’s designation across states.

Brillante said she would like to get feedback concerning third-party reviewers and whether vendors were audited for their review quality. The Working Group discussed how providers determine difficulty levels.

Brillante said Maryland assigns difficulty levels to both classroom and self-study courses. She said the need for uniform public-facing approval methods and suggested leveraging CE vendors to require difficulty levels in course applications for easier display and review.

Delgado said the Working Group will continue further discussions concerning course difficulty levels. She said the CER Form can be found on the Working Group webpage.

Having no further business, the Uniform Education (D) Working Group adjourned.