Continuing Education Reciprocity

Comments

Nov. 4, 2026

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WebCE (Scott McKelvey)

October 27, 2026

TO: NAIC Producer Licensing Task Force
RE: Comments on CE Reciprocity Agreement
Appendix B Continuing Education Recommended Guidelines for Online Courses

As a national education provider of continuing education, ExamFX appreciates the opportunity to submit comments to the Producer Licensing Task Force on Appendix B of the CE Reciprocity Agreement, Continuing Education Recommended Guidelines for Online Courses.

First, with regard to the "Final Assessment" bullet points in Appendix B, we have two suggested additions:

- Require the agent to sign an attestation that both the course and the exam were completed without assistance from any person, program, or device. (*This requirement is in place in multiple states and would seem to be a best practice.)*
- Have policies and processes in place for when noncompliant behavior is detected (ie, browser refreshers, proxy completions, attempts to defeat exam security, etc.)

Second, ExamFX would be in favor of updating the word count formula that is used to establish the appropriate number of credit hours for an online course. The original formula was developed years ago based on "average adult reading speed of 180 words per minute" as a general benchmark for calculating credit hours, and does not take into account interactive course elements such as video, exercises, simulations, or hands-on assessment activities.

Data from instructional designers of online courses shows that comprehension, elaboration, and application cause slower reading speeds compared with straightforward text consumption.

Educational researchers distinguish between:

1. Reading to understand
2. Reading to learn
3. Reading to master and apply

As task difficulty increases, readers slow down to integrate new concepts, connect ideas, and encode information into memory. The objective is not simply to finish reading the text but to build durable knowledge.

For compliance, certification, and professional skills training like continuing education, a reasonable evidence-informed assumption is:

Learning Goal	WPM Assumption
Read and understand	175-200
Learn new information	125-175
Master technical concepts	100-150
Technical/regulatory mastery with application	75-125

For text-heavy learning, experts recommend:

Seat Time = Word Count ÷ 150 WPM

Then add:

- +15-25% for knowledge checks
- +15-30% for application exercises and actual runtime for videos

Sample Calculation

A 15,000-word course:

- Reading only at 150 WPM = 100 minutes
- Add 25% (25 minutes) for periodic knowledge checks and reflection = 125 minutes
- 25-minutes of video or interactivities = 150 minutes total seat time
- Divide by 50 (50 minutes per credit hour) = **3 credit hours**

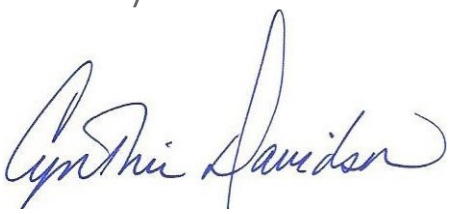
ExamFX would support a change from 180 WPM to 150 WPM as a more realistic benchmark for active learning.

ExamFX agrees with the Online Course Guidelines' use of "Basic", "Intermediate" and "Advanced" classification multipliers to further distinguish a CE course's level of complexity for credit hour purposes. These classifications and multipliers should be retained.

Last, ExamFX is curious whether, in the interest of transparency, education providers should disclose as part of the CER application to what extent the content of an online course has been generated using AI and to what extent the questions on the final (certificate) exam have been generated using AI, as well as the methodologies used to ensure accuracy and relevancy of any AI-generated course content.

ExamFX appreciates the opportunity to participate in this discussion.

Sincerely



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To: NAIC
Date: October 27, 2026
Re: Comments on Appendix B Continuing Education Recommended Guidelines for Online Courses

The following is a response to the Working Group consideration the NAIC formula for determining the number of CE credit hours to be allowed for self-study courses. I am the lead insurance CE course writer at RegEd, Inc., a national provider of continuing education, and have been in that role for 12 years. Prior to that I filled a similar role at Kaplan, Inc. and Dearborn Financial Publishing since 1997.

The current word-count system aims at awarding credit hours for self-study courses on a comparable basis with live instructor-led courses: namely, one credit for one hour spent by the learner. The current word-count formula does not achieve this. Self-study takes longer to complete for each nominal credit hour. There are two reasons for this:

First: exams, review questions, and other interactions are excluded from the calculation. I understand that some state statutes make this exclusion mandatory for exam questions. This is not ideal because the exam takes up a significant amount of time, and from an instructional design perspective contributes significantly to the learning experience. They are not an after-thought.

Furthermore, the rules that automatically exclude exams from the credit-hour calculation do not automatically exclude the counting of time spent answering questions and completing other interactions within the course content itself. These interactions often contribute to learning more than straight text itself. By not counting these interactions, course creators are disincentivized from creating the most engaging and instructive possible for licensees.

Second, 180 words per minute is too fast for reading typical insurance CE topics. A CE course is not a novel and can't be readily skimmed. A more reasonable number would be closer to 125 to 150 words per minute that is typical of spoken English—again, aiming at parity with an instructor-led course.

These lower numbers are mathematically implicit in the multipliers found in the NAIC formula that apply for difficult material. But I would argue that you can't anticipate in advance which material would be difficult for a particular learner and which would not. So-called beginner courses tend to be surveys of multiple topics and quite difficult for a true beginner. While advanced courses tend to focus on a small number of topics and be quite easy for a licensee who has been working in the area for years. A better approach would be to simply make the multiplier applicable to all courses. The result would be equivalent to using a lower number of words per minute to compute CE credit.

Why do we have credit-HOURS at all, instead of a credit system that is unrelated to time (perhaps simply based on mastery of a topic)? It is to set the expectations of the learner that the experience will take a specific amount of time. The current methodology misses the mark. And by missing the mark, encourages learners to skim and take other shortcuts that degrade the educational experience.

I believe that the modifications suggested above will bring the credit-hour calculation more in line with the likely experience of the learner while simultaneously encouraging course writers to make their courses more engaging and ultimately more educational for licensees.

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Thank you for the opportunity to provide feedback on the CE Reciprocity Agreement – Recommended Guidelines for Online Courses, Appendix B. WebCE, a provider of online continuing education nationwide, works with states under the Reciprocity Agreement often and we feel there is an opportunity to improve the understanding of the exam banks and the following bullet:

> "*At least enough questions to fashion a minimum of 2 versions with a least 50% of questions being new/different in each subsequent version*"

The first way this is sometimes understood is as a single statement referring to exam bank size. In that view, an exam of 50 questions would need 75 total in the bank so that each attempt, including the second, could differ by 50%.

The next way this is sometimes understood is as two separate statements: one relating to exam bank size and the other related to variance between exams. In that interpretation, the exam bank for a 50-question exam needs 100 questions so that there are enough for two unique versions. Then, separately, the 50% variance rule is applied to ensure second and third attempts differ from the first.

Finally, a third interpretation has focused on the concept of "2 versions" which has resulted in an expectation that a course has two, pre-generated, static exams that alternate rather than dynamically generated exams from a question bank.

The first interpretation seems to be the most common across the states: expecting a 50% larger question bank than is necessary to deliver an exam. If that is correct, our recommendation would be to split this into two separate bullets as follows:

- Exam banks must consist of an additional 50% more questions than are needed to deliver a single exam.
- Exam delivery should be fashioned in such a way as to prevent subsequent attempts from including more than 50% duplicated questions as on the previous attempt.

Thank you for the opportunity to be heard and to support this community with our feedback. Please reach out if we can be of further assistance.

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