

## **FL DOI COMMENTS 5.14**

- Page 1 of the agreement, ii. – “Provider has procedures for reviewing course material in order to keep it up to date and timely” – This seems to be something more appropriate for a Provider approval application vs. a Course approval application. Wondering how other states will confirm/address this part of the substantive review. Florida doesn’t want the provider to have to send us some kind of procedure they have with each course submittal. Could this either be removed or put in the instructions as some type of “understanding?” In Florida, keeping a course updated is a requirement in our Administrative Rule, but we don’t ask them to show us how they plan to do it. And as an FYI, substantive changes to a course require a new course submittal.
- Page 2 of the agreement, number 3. at the top of the page – This seems to limit the documentation a reciprocal state can ask for when a course application is submitted using the CER form. In Florida, we have a robust auditing program for education courses. When it comes time for us to audit one of these courses, which could be two months after approval or two years after approval, our auditor needs most all documentation related to the course. So it sounds like we have two options: 1) Ask for the course documentation prior to an audit; or our preference 2) Ask for the course documentation during the course submission process, but not use it as part of the approval. Would the latter be acceptable?
- Page 2 of the agreement, last statement regarding states notifying one another when a CE provider or instructor has been the subject of an action – It doesn’t sound like there is currently an electronic/efficient mechanism for doing this, but until one is developed, states would work together to notify one another via a more manual process (likely through email). Florida supports this plan.

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