

MD COMMENTS 4.9.19

CER Agreement has been reviewed and below are suggestions and comments.

Thank you.

I. CER Agreement

1. Reverse order of first two paragraphs to better frame the objectives of reciprocity; changed word "unnecessary" to "redundant" to provide a more accurate description of need for reciprocity

Whereas, the undersigned Insurance Commissioners of the National Association of Insurance Commissioners, hereafter the Commissioners, have determined that it is in the best interest of each of their States and their insurance producers to simplify the continuing education process and reduce barriers to non-resident CE providers in that State.

Whereas, the Commissioners have determined that it is redundant for each State to perform a substantive review of continuing education courses or individual instructors that have been previously approved by another state.

(No edits to Definition)

2. Change order to highlight responsibilities of each state as basis for agreement;

The Commissioners agree as follows:

1. Each state will conduct a substantive review of continuing education courses submitted for Home State approval based on the above definition. A CE provider's home state means

2. Each state accepts and will use the following standards for substantive course review:

(No edits to a-e bullets. Delete bullet f because no instructor standards have been set and not in keeping with #s 6 &7)

3. Each State will accept the NAIC Uniform CER Course Filing Form (Appendix A), or a substantially similar form including an equivalent submission method, the detailed timed agenda, and the required home state approval document as the sole requirements for a reciprocal course submission.

(Rationale for change:

- how can a determination be made as to whether a course meets a particular state's regulation if there is no agenda to be reviewed. Also to match the instructions on the NAIC CER form.

- The review is made of each submitted course, not the Provider)

4. Unless specifically limited by State law and regulations, a reciprocal State will award a course the same number of credits as approved by the CE provider's home State.

5. *(proposed numbering)* A reciprocal State agrees to approve a course submission within 30 days of receipt, provided that the course is filed using the NAIC Uniform CER Course Filing Form (Appendix A) or an equivalent electronic submission method, and contains the detailed timed agenda, and the home state course approval.

(No edits for original number 5-7)

QUESTIONS:

A. Transitional action for those courses that are already approved but now do not meet guidelines? Is there a "clean up" of course to be scheduled?

B. Action for new courses that were erroneously approved by home state but does not meet NAIC guidelines? (miscalculated credit hours, not approvable topics)