



Securities & Insurance
Licensing Association

www.sila.org

May 8, 2019

Ms. Rachel Chester
Mr. Greg Welker
NAIC Uniform Education Working Group

RE: NAIC Continuing Education Reciprocity (CER) Agreement

On behalf of our members, the Securities and Insurance Licensing Association (SILA) appreciates the opportunity to provide additional comments to the National Association of Insurance Commissioners (NAIC) Uniform Education Working Group's draft of the Continuing Education Reciprocity (CER) Agreement. In this letter, we respectfully request your attention to the following proposed revisions and questions.

Second Paragraph – strike “individual instructors”

Whereas, the undersigned Insurance Commissioners of the National Association of Insurance Commissioners, hereafter the Commissioners, have determined that it is **redundant unnecessary** for each State to perform a substantive review of continuing education courses or **individual instructors** that have previously been approved by another State.

States still have their own instructor approval process and there is currently no reciprocal approval process or application for instructors, even if the home state has performed a substantive review of instructor qualifications.

Strike “a substantially similar form including”

1. Each State will accept the NAIC Uniform CER Course Filing Form (Exhibit A) or **a-substantially similar form including** an equivalent electronic submission method, and the required home state course approval document as the sole requirements for a **reciprocal course submission non-resident-CE provider**.

SILA recommends acceptance of only the NAIC Uniform CER Course Filing Form, either in paper or electronic format.

Question

6. A State's course approval document or approved course application will include, at a minimum, the following information: course title, credit hours, credit category, method of instruction, and clearly indicate if it is a **home state** approval.

Is there a way for the home state to indicate on the approval document that it is a home state approval?

Lastly, SILA would like to recommend that, through a separate vetting process, the NAIC Uniform Education Working Group pursue reciprocity for instructor approval and a uniform application / process.

Sincerely,

A handwritten signature in cursive script that reads "Brandi Brown".

Brandi Brown, Chair
Continuing Education Reciprocity Task Force
SILA Education and Training Subgroup