PRODUCER LICENSING (D) TASK FORCE

Draft Pending Adoption

Draft: 8/23/26

Producer Licensing (D) Task Force
Columbus, Ohio
August 12, 2026

The Producer Licensing (D) Task Force met in Columbus, OH, Aug. 12, 2026. The following Task Force members participated: Vicki Schmidt, Chair, represented by Monicka Richmeier (KS); Scott A. White, Vice Chair, represented by Richard Tozer (VA); Heather Carpenter represented by Kayla Erickson (AK); Charles Bassett (AZ); Ricardo Lara represented by Charlene Ferguson (CA); Karima M. Woods represented by Sheila Johnson-Parker (DC); Trinidad Navarro represented by Jessica R. Luff (DE); Dean L. Cameron (ID); Sharon P. Clark represented by Shawn Boggs (KY); Timothy J. Temple represented by Lorie Gasior and Matthew Stewart (LA); Marie Grant represented by Mary Kwei (MD); Timothy N. Schott (ME); Angela L. Nelson represented by Marjorie Thompson (MO); Mike Chaney represented by Vanessa C. Miller (MS); Jon Godfread represented by Susan Daou (ND); Eric Dunning represented by Kevin Schlautman (NE); Ned Gaines represented by Jacob Roberts (NV); Judith L. French represented by Timothy Schirmer (OH); Glen Mulready represented by Erin Wainner (OK); TK Keen represented by John Haworth (OR); Michael Humphreys represented by Michael Fissel (PA); Elizabeth Kelleher Dwyer represented by Marial Garcia (RI); Larry D. Deiter (SD); Amanda Crawford represented by Jodie Delgado and Daniel McAdams (TX); Patty Kuderer represented by Andrew Davis (WA); Nathan Houdek represented by Jamie Adams (WI); and Erin K. Hunter represented by Rob Grishaber (WV).

1. <u>Adopted its July 16 Minutes</u>

The Task Force met July 16. During this meeting, the Task Force took the following action: 1) adopted its May 14 minutes; 2) received an update on the 1033 template and the definition of “conviction” survey; 3) received an update on the Uniform Appointment Termination for Cause Form; 4) received an update on remote exams for producer licensing testing; 5) received an update from the National Insurance Producer Registry (NIPR); and 6) received updates from its working groups.

Director Cameron made a motion, seconded by Stewart, to adopt the Task Force’s July 16 minutes (Attachment One). The motion passed unanimously.

2. <u>Heard a Report from the NIPR Board of Directors on the NIPR Road Map</u>

Director Deiter, on behalf of the NIPR Board of Directors, reported on the success of the 2025–2026 NAIC Zone training program, through which NIPR, in partnership with the NAIC, completed in-person trainings in each zone over the past two years. The training covered producer licensing history, licensing uniformity and reciprocity, NIPR and NAIC licensing tools, and emerging licensing issues. Director Deiter said NIPR is preparing for the NAIC/NIPR Insurance Summit scheduled for Sept. 29–Oct. 2 in Kansas City, MO, which will include a licensing track with sessions on NIPR’s future road map.

Eric Saul (NIPR) said that over the past five years, NIPR has rebuilt the foundation underlying its products by moving to new cloud infrastructure, adopting new software design, launching a new identity system, building an enterprise data warehouse, and creating a new design system. Saul said NIPR’s LicenseHub, which is the new version of NIPR’s licensing center where producers and licensing administrators apply for, renew, and manage licenses, will be released to production on Sept. 12. Saul described LicenseHub as the third piece of a three-year effort to modernize NIPR’s web experience.

Saul said NotifyPro is the new version of NIPR’s producer monitoring service that will replace the current alerts functionality. Saul said that while the current service notifies companies daily when producer data changes, it does not identify what changed. Saul said NotifyPro will specify what changed and is scheduled to be released to production by the end of the year.

Saul described two additional projects targeted for release around the middle of 2027. Saul said user accounts will provide applicants with an NIPR profile that saves their information. Saul said this will support increased security, personalization, and a stronger audit trail for states. Saul said the LicenseHub Document Center is a rebuilt version of the Attachments Warehouse and will feature a fully rewritten, tailorable alert system and a full application programming interface (API) to integrate documents into state back-office systems, such as Sircon and State Based Systems (SBS).

3. <u>Heard a Presentation from the Coalition on the Evolving Fraud Landscape</u>

Michelle Rafeld (Coalition Against Insurance Fraud—Coalition) presented on the evolving insurance fraud landscape and its intersection with the producer licensing process. Rafeld said more than $308.6 billion is lost to insurance fraud annually, a cost ultimately passed to consumers and businesses through higher premiums. Rafeld cited a 2023 Coalition study conducted with Verisk, finding that 15% of the U.S. population, approximately 50 million people, do not view insurance fraud as a crime.

Rafeld described how insurance fraud has evolved from opportunistic, locally confined acts into organized, technology-enabled, and globally coordinated schemes, and identified three converging forces fundamentally changing insurance fraud: 1) the rapid expansion of technology and artificial intelligence (AI); 2) the growth of synthetic identities; and 3) the globalization of fraud operations. Rafeld explained that widely available AI has lowered the barrier for criminals to conduct sophisticated fraud by enabling them to steal consumer data; file bogus claims; take over accounts; and impersonate claimants, license applicants, and insurance professionals.

Rafeld described synthetic identities, which are manufactured by combining real and fictitious information over months or years, as extremely difficult to detect. Because of this, Rafeld said that identity verification can no longer be a one-time event and must be continually validated by insurers throughout the policy life cycle and by state insurance regulators throughout the licensing process. Rafeld said the removal of geographic boundaries has made insurance fraud a lucrative revenue source for transnational criminal organizations. Rafeld said fraud activities include increased cybersecurity attacks, counterfeit carrier websites and mobile apps, account takeovers using AI-generated audio and video, and the use of life and annuity products for money laundering.

Rafeld described a connection between organized insurance fraud and human trafficking, citing information shared by Michael Skiba (Colorado State University Global) regarding an operation involving hundreds of people forced to participate in insurance fraud schemes. Rafeld said individuals may be forced to commit licensing fraud to repay trafficking debts. She said criminal groups also attempt to place members inside insurance companies as job applicants using stolen or synthetic identities and AI-assisted interviews. Rafeld said that the infiltration risk has now entered the producer licensing process, making licensing a critical fraud-prevention function that warrants national background checks and added identity verification.

Rafeld recommended that the Task Force consider incorporating additional identity verification steps into the producer licensing process. She also recommended monitoring applications and examinations for the use of shared devices, IP addresses, telephone numbers, email addresses, payment methods, as well as unusually rapid completion and repeated attempts at producer licensing examinations. Rafeld said states should compare information across resident and nonresident applications and enhance the sharing of confirmed patterns among themselves, examination vendors, licensing organizations, law enforcement, and affected insurers. Rafeld said the NAIC should consider updating model acts to ensure states can promptly disable licensing credentials when fraud is identified.

In response to questions, Rafeld said that fraud, which began in life and annuity lines, is now moving into property/casualty (P/C) lines, citing a Southern California scheme involving high-end vehicles, staged accidents, and body shops. Rafeld further described testing fraud in which organized groups circumvent online examination controls and complete exams in under 15 minutes. Rafeld urged the Task Force to consider ways to protect legitimate producers whose identities are stolen and used to obtain nonresident licenses.

4. <u>Discussed the 1033 Written Consent Process—Definition of "Conviction"</u>

Tozer provided an update on a survey of states regarding how they define the term "conviction" for the Title 15 U.S.C. Section 1033 written consent process. He said 33 jurisdictions had responded and encouraged the remaining states to complete the survey. Tozer said the responses revealed divergence among the states, with one of the largest areas of divergence concerning sealed records. Tozer said roughly half the states include them in the definition of "conviction," and half do not. Tozer said a similar split exists regarding expunged convictions, with the primary distinction being whether expungement is viewed as eliminating the conviction for all purposes or whether the historical conviction remains relevant to licensure. Tozer said the Task Force would review the survey data over the next several meetings and provide additional analysis and suggested next steps.

5. <u>Adopted the Reports of its Working Groups</u>

   A. <u>Adjuster Licensing (D) Working Group</u>

Gasior said the Working Group met four times since the Spring National Meeting, focusing on designated home state (DHS) issues and the need to clearly define terms that did not previously exist in the NAIC *Independent Adjuster Licensing Guideline* (GL 1224). Gasior said the Working Group received input from all interested parties to reach consensus on common concepts and definitions and adopted revisions to GL 1224. She said the Working Group would continue to partner with NIPR to further DHS reporting efficiencies that benefit states, industry, and companies.

Richmeier said GL 1224, adopted by the Working Group on July 15, would be exposed for a 30-day public comment period ending Sept. 11. The Task Force will review the comments and continue its discussion, with final adoption targeted for its Oct. 15 meeting.

   B. <u>Producer Licensing Uniformity (D) Working Group</u>

Schlautman said the Working Group met three times since the Spring National Meeting, focusing on its review of the *State Licensing Handbook* and its assessment of state compliance with the NAIC Uniform Licensing Standards (ULS). Schlautman said the Working Group finalized its review of Chapter 12—Business Entities, agreeing to broad revisions to improve consistency with the *Producer Licensing Model Act* (#218) and to clarify business entity licensing and appointment language. Schlautman said the Working Group completed its review of Chapter 13—Temporary Licenses, aligning the introductory language with Model #218 while adding language addressing other circumstances deemed to be in the public interest. Schlautman said the Working Group reviewed Chapter 19—Bail Bond Agents, updating references to federal authorities and forms and simplifying language to recognize state-specific requirements.

Schlautman said the Working Group compiled state responses to the ULS charts to identify areas of compliance, which will be posted on the Working Group's web page and used to evaluate low-compliance areas and opportunities for improvement.

C. Uniform Education (D) Working Group

Delgado said the Working Group met three times since the Spring National Meeting, centering its work on four areas. Delgado said the Working Group adopted revisions to Appendix C of the Continuing Education Reciprocity (CER) Agreement to provide clarifications and replace the term "monitor" with "proctor." Delgado said the NAIC Standardized Instructor Form still needs further review following a robust discussion about what additional identifying and background information should be collected. Delgado said the Working Group is also considering course category and difficulty options, as well as the collection of a Federal Employer Identification Number (FEIN) on provider applications, as it begins its review of Appendix B of the CER Agreement.

Schirmer made a motion, seconded by Haworth, to adopt the reports of the Adjuster Licensing (D) Working Group, including its July 15 (Attachment Two), June 25 (Attachment Three), May 27 (Attachment Four) and April 22 (Attachment Five) minutes; the Producer Licensing (D) Uniformity Working Group, including its July 21 (Attachment Six), June 16 (Attachment Seven) and April 21 (Attachment Eight) minutes; and the Uniform Education (D) Working Group, including its July 8 (Attachment Nine), May 13 (Attachment Ten) and April 15 (Attachment Eleven) minutes. The motion passed unanimously.

6. Discussed the Uniform Appointment Termination for Cause Form

Stegall said the Uniform Appointment Termination for Cause Form is intended to provide companies with a robust initial notification to regulators regarding terminations for cause. Stegall said the form would provide a starting point for regulators to identify a direct company contact, producer information, and the states to which the termination is reported. Stegall said the form would address the current lack of a uniform process. Stegall said the ultimate goal is for the form to become an electronic document with dropdown selections based on Model #218 termination reasons. Stegall said this would allow a company to complete a single report and route it to the selected states. Stegall said the approach would create efficiencies for companies and states and strengthen consumer protection by reducing missed or late termination reports. Stewart asked whether the form could be connected with the NAIC Online Fraud Reporting System so companies would not have to submit information twice. Richmeier said the Task Force is exploring electronic submission options to best facilitate submissions for companies and states.

Richmeier noted that a survey of state requirements for termination of appointments for cause would be circulated to regulators in the near future.

Having no further business, the Producer Licensing (D) Task Force adjourned.

Draft: 8/4/26

Producer Licensing (D) Task Force
Virtual Meeting
July 16, 2026

The Producer Licensing (D) Task Force met July 16, 2026. The following Task Force members participated: Vicki Schmidt, Chair, represented by Monicka Richmeier (KS); Scott A. White, Vice Chair, represented by Richard Tozer (VA); Heather Carpenter represented by Kayla Erickson (AK); Charles Bassett (AZ); Ricardo Lara represented by Troy Dickinson (CA); Michael Conway represented by Steven Giampaolo (CO); Karima M. Woods represented by Sheila Parker-Johnson (DC); Trinidad Navarro (DE); Michelle B. Santos represented by Alice Cruz (GU); Doug Ommen represented by Robin Petersen (IA); Ann Gillespie represented by Justin Hammersmith (IL); Sharon P. Clark represented by John Hord (KY); Timothy J. Temple represented by Lorie Gasior and Matthew Stewart (LA); Marie Grant represented by Lorelei Brillante (MD); Timothy N. Schott (ME); Anita G. Fox represented by Jill Huisken and Michele Riddering (MI); Grace Arnold represented by Sarah J. Adam (MN); Angela L. Nelson represented by Marjorie Thompson (MO); Mike Chaney represented by Vanessa C. Miller (MS); Jon Godfread represented by Susan Daou (ND); Eric Dunning represented by Kevin Schlautman (NE); Alice T. Kane represented by Vanessa DeJesus (NM); Judith L. French represented by Lindsey Jones (OH); Glen Mulready represented by Erin Wainner (OK); Michael Humphreys represented by Michael Fissel (PA); Elizabeth Kelleher Dwyer represented by Rachel Chester (RI); Larry D. Deiter (SD); Amanda Crawford represented by Jodie Delgado (TX); Patty Kuderer represented by Andrew Davis (WA); and Nathan Houdek represented by Melody Esquivel (WI).

1. Adopted its May 14 Minutes

The Task Force met May 14. During this meeting, it took the following action: 1) adopted its Spring National Meeting minutes (*see NAIC Proceedings – Spring 2026, Producer Licensing (D) Task Force*); 2) appointed an ad hoc subgroup to develop a uniform producer appointment termination for cause form; 3) discussed the 1033 template and a draft survey addressing how states define “conviction”; 4) received updates from its working groups; and 5) discussed potential reformatting of the PDF uniform producer licensing applications.

Miller made a motion, seconded by Bassett, to adopt the Task Force’s May 14 minutes (Attachment One-A). The motion passed unanimously.

2. Received an Update on the 1033 Template—Definition of “Conviction” Survey

Tozer provided a brief update on the 1033 template survey regarding how states define the term “conviction” for the processing of 1033 waiver requests. The primary purpose of the survey is to identify which types of criminal justice outcomes states include in their definition of “conviction” (e.g., sealed records, expunged convictions, pleas in abeyance, nolo contendere/no contest pleas, and diversion programs), and the rationale for their inclusion or exclusion. Tozer said the Task Force had received approximately 31 state responses. Tozer said the Task Force was not yet ready to share the results but noted that there are a significant number of differences among the states. Tozer said the Task Force would discuss the survey responses to identify areas of commonality and divergence among states.

3. Received an Update on the Uniform Appointment Termination for Cause Form

Richmeier provided the update on behalf of Amy Stegall (CT), who chairs the ad hoc subgroup developing the draft of the form for the Task Force’s review. Richmeier said the subgroup has met once meeting since its creation, during which it reviewed the draft termination for cause form that the Securities & Insurance Licensing Administrators (SILA) had submitted to the NAIC for review.

Richmeier highlighted two of the suggestions the subgroup is considering. First, the subgroup suggested using the *Producer Licensing Model Act* (#218) license denial, suspension, and revocation reasons to keep for-cause termination reasons consistent with the uniform standards under Model #218. This would also help exclude terminations that do not meet most states' statutory definitions of termination for cause, such as those based on a lack of work product. Second, the subgroup suggested using the National Producer Number (NPN) rather than the Social Security number (SSN) as the identifier, noting that a licensed producer already has an NPN. Richmeier said the subgroup is working on a first draft of the form for circulation at the Summer National Meeting.

4. Received an Update on Remote Exams for Producer Licensing Testing

Richmeier said the review of remote examinations for producer licensing was established as one of the Task Force's priorities for 2026. Richmeier said there have been regulator-to-regulator meetings of the Producer Licensing (D) Task Force and the Antifraud (D) Task Force because the discussions involved names of specific entities under investigation. Richmeier said the Task Force also heard presentations from three exam vendors, which provided an overview of how online exams are administered, the security measures currently in place, and those forthcoming.

Richmeier said the discussions would be open to all interested parties as the work moves forward, but he said additional regulator-to-regulator meetings may still be necessary for case-specific discussions. Richmeier said the Task Force's goal is to work with industry to develop guidelines for uniform and secure exam delivery of remote exams.

Tozer said this is an important goal, particularly for states where remote testing is one of the few examination options available.

5. Received an Update from NIPR

Trevor Barnard (National Insurance Producer Registry—NIPR) provided an update on NIPR's 2026 product road map, which is organized into three categories: licensing, compliance management, and the platform. Barnard reported that the uniform application update was completed in the second quarter of this year and went live across all jurisdictions on April 9. Barnard noted that NIPR processes approximately 28,000 licensing transactions per day and characterized the launch as highly successful.

Barnard described the LicenseHub modernization project, a multiyear effort that began in 2024 to replace inconsistent legacy interfaces with a consistent user experience across NIPR applications. He said the reporting component went live in 2024, the website's design was updated in 2025, and the LicenseHub application, which is used to submit the uniform application to the jurisdictions, is scheduled to go live in August 2026. Barnard said that LicenseHub addresses resident and nonresident licensing and renewals, as well as adjuster licensing. It includes features such as demographic updates, producer database reports, continuing education (CE) transcript information, and receipt and payment history. He said the design is based on usability testing and that NIPR's communications team is preparing customers through help articles, in-application notifications, and webinars.

Barnard described several additional road map items, including the Notify Pro application, scheduled for delivery in August of this year; a new communication platform delivered in the second quarter of this year; and a producer accounts initiative that will provide a single, secure login across NIPR applications. Barnard said the new LicenseHub document center will replace the existing attachments warehouse with a single, account-based document experience that consolidates background questions, supporting documents, and reporting of actions.

Barnard reported on the adjuster Designated Home State (DHS) enhancement developed with the Adjuster Licensing (D) Working Group. He noted that NIPR presented two potential solutions to the Working Group in June and that the Working Group agreed to a solution that uses the producer database to narrow the selection of DHS so that adjusters are not presented with an unwieldy list of nonresident licenses. He said NIPR is now working with the states individually to obtain approval. Barnard also reviewed NIPR's state business rule update process, noting that four state teams work on state rule updates released on a roughly monthly cadence.

Richmeier thanked Barnard for his first update to the Task Force. NIPR noted a regulator-to-regulator state webinar would be scheduled for the following week to allow state insurance regulators to preview additional future product enhancements, including the LicenseHub.

6. Received Updates from its Working Groups

   A. Producer Licensing Uniformity (D) Working Group

Huisken said the Working Group has continued its review of the *State Licensing Handbook* (Handbook), having completed Chapter 12—Business Entities and Chapter 13—Temporary Licenses, and would next review Chapter 19—Bail Bond Agents. Huisken reported that the Working Group has completed its survey of states' compliance with the Uniform Licensing Standards (ULS), has begun analyzing the data to identify areas where some states may not be fully aligned with the standards, and will begin discussions on those areas in the coming months to better understand the challenges those states face.

Tozer asked whether there had been any discussion about creating a Handbook chapter on pharmacy benefit manager (PBM) licensing. Huisken said the Working Group intends to begin drafting a PBM chapter after it completes its review of the existing chapters. Tim Mullen (NAIC) said the NAIC Membership will consider adoption of the PBM licensure and regulation guidance for regulators during the Summer National Meeting.

   B. Uniform Education (D) Working Group

Delgado said the Working Group approved edits to Appendix C— Webinar and Webcast Delivery of the Continuing Education Reciprocity (CER) Agreement. Delgado said the Working Group is now turning its focus to Appendix B—Continuing Education Recommended Guidelines for Online Courses. Delgado said the Working Group will also review the uniform instructor approval form, noting that although the instructor approval process had previously been approved, the form itself had not.

   C. Adjuster Licensing (D) Working Group

Chester said the Working Group has focused on its DHS by updating the definitions in the NAIC Independent Adjuster Licensing Guidelines. Chester said the Working Group conducted an e-vote to adopt revisions to the guidelines and will present the recommended changes to the Task Force for consideration of adoption. Chester noted that, combined with the NIPR enhancements described by Barnard, these guideline updates will help industry, state insurance regulators, and applicants advance toward greater uniformity and reciprocity for adjuster licensing.

7. Discussed Other Matters

Chester noted that this would be her last Producer Licensing (D) Task Force meeting, both as a representative of Rhode Island and as chair of the Adjuster Licensing (D) Working Group, since she is leaving her role at the Rhode Island Division of Insurance. Richmeier thanked Chester for her dedication, knowledge, and contributions to the

NAIC, Rhode Island, and state insurance regulators across the country. Other meeting participants offered their appreciation and best wishes

Having no further business, the Producer Licensing (D) Task Force adjourned.

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Producer Licensing (D) Task Force
Virtual Meeting
May 14, 2026

The Producer Licensing (D) Task Force met May 14, 2026. The following Task Force members participated: Vicki Schmidt, Chair, represented by Monicka Richmeier (KS); Scott A. White, Vice Chair, represented by Richard Tozer (VA); Heather Carpenter represented by Kayla Erickson (AK); Charles Bassett (AZ); Ricardo Lara represented by Charlene Ferguson (CA); Michael Conway represented by Steven Giampaolo and Rolf Kaumann (CO); Karima M. Woods represented by Sheila Parker-Johnson (DC); Doug Ommen represented by Robin Petersen (IA); Ann Gillespie represented by Justin Hammersmith (IL); Timothy J. Temple represented by Lorie Gasior (LA); Marie Grant represented by Lorelei Brillante (MD); Robert L. Carey represented by Timothy N. Schott (ME); Anita G. Fox represented by Jill Huisken (MI); Grace Arnold represented by Sarah J. Adam (MN); Angela L. Nelson represented by Marjorie Thompson (MO); Mike Chaney represented by Vanessa C. Miller (MS); Jon Godfread represented by Robyn Krile (ND); Eric Dunning and Kevin Schlautman (NE); Alice T. Kane represented by Lillian Baros (NM); Judith L. French represented by Lindsey Jones (OH); Glen Mulready represented by Erin Wainner and Courtney Khodabakhsh (OK); TK Keen represented by John Haworth (OR); Elizabeth Kelleher Dwyer represented by Rachel Chester and Matthew Gendron (RI); Larry D. Deiter represented by Tony Dorschner (SD); Amanda Crawford represented by Jodie Delgado (TX); Patty Kuderer represented by Andrew Davis (WA); Nathan Houdek represented by Melody Esquivel (WI); and Allan L. McVey (WV). Also participating was: Jill Marocchini (CT).

1. <u>Adopted its Spring National Meeting Minutes</u>

Ferguson said her name is misspelled on page 3 of the minutes. Ferguson said the minutes of Aug. 24, 2024, referenced in the American Property Casualty Insurance Association (APCIA) comments dated Nov. 14, 2025, should be changed to reflect that Director Deiter, rather than she, said the Producer Licensing Uniformity (D) Working Group will review the *State Licensing Handbook* for possible revisions, including sections addressing 1033 waivers. Ferguson said she had a conversation with Director Deiter, who agrees with this change.

McVey made a motion, seconded by Ferguson, to adopt the Task Force's March 23 minutes, as modified (*see NAIC Proceedings – Spring 2026, Producer Licensing (D) Task Force*). The motion passed unanimously.

2. <u>Adopted a Charge and Appoint an Ad Hoc Subgroup to Develop a Uniform Appointment Termination for Cause Form</u>

Richmeier said representatives from the Securities and Insurance Licensing Administrators (SILA) brought the need for an appointment termination for cause form to the Task Force's attention during the Spring National Meeting. During that meeting, the Task Force members seemed receptive to exploring the creation of a form at the NAIC.

Delgado said the draft SILA form indicates documents will be attached and asked if there would be electronic functionality to receive documents. Richmeier said the immediate focus is to create a uniform termination for cause form and identify which documents should be submitted. Richmeier said the first step is to develop a uniform form, and the second step is to develop a uniform electronic submission process for the centralized submission of termination for cause notices.

Huisken suggested in the Webex chat that the NAIC CoCode should be added to the form. Dorschner also commented that a data field for the NAIC Group Code should be included. Marocchini proposed in the chat that carrier contact information, including phone number and email, should be part of the form.

Chester said this process should focus on reasons for statutory terminations for cause and exclude appointment terminations for such things as lack of agent production. Chester said it would be helpful to have a central repository for appointment terminations for cause.

Richmeier said there is not a charge for this work and requested a motion to appoint an ad hoc subgroup to develop an NAIC Uniform Producer Appointment Termination for Cause Form.

Chester made a motion, seconded by Delgado, to appoint an ad hoc subgroup to develop an NAIC uniform producer appointment termination for cause form. The motion passed.

Richmeier thanked SILA for bringing this issue to the Task Force and said that SILA's work would provide a good basis for the work of the Task Force. To help expedite this work, Richmeier said a small subgroup of regulator subject matter experts (SMEs) would work with NAIC staff to develop an initial draft for the Task Force's discussion and public comment.e

3. Discussed the 1033 Template – Definition of Conviction Survey

Tozer said the Task Force discussed this issue during its previous meeting, and a draft survey has been prepared for review. He said the survey seeks information on the states' definitions of conviction, the treatment of plea outcomes, and licensing implications. Delgado suggested that the second question include the outcomes states do not include, in addition to the outcomes they do include. Haworth suggested collecting citations to state statutes and regulations. Tozer said the survey would be structured so that states could enter a specific state citation and then include a narrative box for additional information. Delgado said Texas will need to submit multiple criminal code citations. Tozer said he would work with NAIC staff to finalize the survey to provide structured response options for some questions, while other questions will include narrative responses.

4. Received Updates from its Working Groups

A. Adjuster Licensing (D) Working Group

Chester said the Working Group is meeting monthly to discuss solutions related to Designated Home State (DHS) licensing. Chester said she is also working directly with the National Insurance Producer Registry (NIPR) on potential enhancements for future review by the Working Group. She said the Working Group is developing a "gold standard" for adjuster licensing through establishing consistent definitions, consistent licensing approaches, and standardized evaluation criteria. Cheser said the Working Group is reviewing existing NAIC materials that have already been developed to assist in this work.

B. Producer Licensing Uniformity (D) Working Group

Schlautman said the Working Group is continuing its work to review and update, as needed, the *State Licensing Handbook*. He said the Working Group has most recently focused on Chapter 12—Business Entities and will soon begin its review of Chapter 13—Temporary Licenses. Schlautman said the Working Group has 48 state responses to the survey of states' compliance with the Uniform Licensing Standards (ULS).

C. Uniform Education (D) Working Group

Delgado said the Working Group is meeting monthly to address potential revisions to Appendix C (Course Guidelines for Classroom Webinar/Webcast Delivery Guidelines) of the Continuing Education Reciprocity (CER) Agreement. Delgado said the Working Group is also drafting a Uniform Instructor Approval form.

5. Discussed Potential Reformatting of the PDF Uniform Producer Licensing Applications

Richmeier said this has been placed on the agenda due to an April 2024 Department of Justice (DOJ) rule updating its regulations for Title II of the Americans with Disabilities Act (ADA). The final rule has specific requirements about how to ensure that web content and mobile applications are accessible to people with disabilities. While the compliance date for state and local government entities was extended to April 26, 2027, Richmeier said the NAIC is continuing to audit forms posted on its website to ensure proper accessibility for people with disabilities. The PDFs of the uniform applications were identified as forms needing updates.

Richmeier said a reformatted application is being shared today as an example of what is being drafted. The substantive content of the applications is not being changed. Richmeier said the NAIC wants to ensure any changes in the format are properly coordinated, reviewed, and approved by the Task Force since the uniform producer licensing applications are officially adopted by the Task Force and the NAIC Members.

Tim Mullen (NAIC) said the NAIC continues to prioritize the use of NIPR for electronic licensing and that the PDF versions of the uniform applications are generally used only in limited circumstances. Several jurisdictions indicated that they primarily direct applicants to electronic filing through NIPR. Additional discussion addressed specific structural components of the application forms, including the presence of licensing selection grids and state-specific elements. Mullen said he would take the feedback received today to continue working with other NAIC staff and provide reformatted uniform producer licensing applications for the Task Force's review.

6. Discussed Other Matters

Tozer stated that Virginia will implement new legislation, effective July 1, 2026, removing the requirement for applicants to disclose sealed records in the insurance producer licensing application. He noted that this change may present a conflict with the NAIC uniform producer licensing application. Tozer further explained that Virginia will inform producer applicants that they are not obligated to report sealed criminal convictions when applying for a producer license in the state. Additionally, he pointed out that when a state receives a non-resident application from an individual holding a resident license in Virginia, it is possible that the applicant has not disclosed their complete criminal history during the Virginia licensing process.

Having no further business, the Producer Licensing (D) Task Force adjourned.

Draft: 8/3/26

Adjuster Licensing (D) Working Group
Virtual Meeting
July 15, 2026

The Adjuster Licensing (D) Working Group of the Producer Licensing (D) Task Force met July 15, 2026. The following Working Group members participated: Rachel Chester, Chair (RI); Lorie Gasior, Vice Chair (LA); Kayla Erickson (AK); Charlene Ferguson (CA); Monicka Richmeier (KS); Jill Huisken (MI); Vanessa Miller (MS);Vanessa DeJesus (NM); Courtney Khodabakhsh (OK); Michael Fissel (PA); Jodie Delgado (TX); Randy Overstreet (UT); Richard Tozer (VA); and Lisa Hastings (WY).

1. Adopted its May 27 and April 22 Minutes

The Working Group met May 27 and April 22. During these meetings, the Working Group took the following action: 1) adopted its March 18 minutes; and 2) discussed its 2026 priorities.

Richmeier made a motion, seconded by Gasior, to adopt the Working Group’s May 27 and April 22 minutes. The motion passed unanimously.

2. Discussed its 2026 Priorities

Chester said the next agenda item was the Working Group’s 2026 priorities, including the Designated Home State (DHS) solutioning update. She noted that DHS concerns and application needs had been discussed extensively and thanked state insurance regulators and partners for their work to improve the related data and process.

Chester said the Working Group previously identified the need to relieve state insurance departments from manually verifying an adjuster applicant’s self-selected DHS, noting that state insurance regulators and industry rely on accurate producer licensing database information. She said that state insurance regulators had engaged with the National Insurance Producer Registry (NIPR) throughout 2026 and recently participated in a regulator-only webinar to review the proposed DHS solution. She thanked NIPR and regulators for their collaboration.

Gasior said the NIPR meeting was encouraging and that the proposed solution received a positive response, though additional coordination would be needed on the front-end process, business rule updates, and implementation steps. She said the application process would generally remain the same for industry, except applicants would be limited to states eligible to serve as their DHS. She said the solution should prevent ineligible DHS selections while allowing states to maintain additional refinements. Gasior said the greatest impact would be cleaner data, fewer incorrect DHS updates, and a smoother licensing process for adjusters, companies, state insurance regulators, and other stakeholders.

Laurie Wolf (NIPR) said NIPR conducted a productive state webinar on DHS PDB solutioning and that state insurance regulators should expect an email requesting acknowledgment of the proposed concept and next steps.

Doenges said NIPR planned to email the 32 states using adjuster DHS functionality by July 17 and request responses within one week to keep the project moving.

Wolf said NIPR would remain available for questions and that the project would proceed in phases, including state-specific rules, outreach to back-office solution vendors, and updates for states using SBS, Vertafore, code-your-own systems, or NIPR products.

Chester thanked NIPR and the states for the update, recognized the progress made, and transitioned to the independent adjuster guideline definition updates.

Chester said she and Gasior finalized the proposed *Independent Adjuster Licensing Guideline* (GL 1224) changes to the definition after the Working Group's May 27 meeting and circulated them for an e-vote. Several votes had been received, and she invited remaining Working Group members to ask questions or record their vote. She said the 17-member Working Group had received yes votes from Alaska, California, Florida, Louisiana, Michigan, Mississippi, Oklahoma, New Mexico, Rhode Island, Texas, Utah, and Virginia, and requested responses from the remaining states.

Greg Welker (NAIC) said the adopted changes to GL 1224 would not be placed on the Producer Licensing Task Force upcoming meeting due to timing, but they would be included on the Task Force's agenda for the Summer National Meeting.

Gasior said the goal was to complete within the calendar year and that she would review the adjuster licensing page in the *State Licensing Handbook* to ensure that recent amendments were reflected and no contradictory language remained.

3. <u>Discussed Other Matters</u>

Chester said July 31 would be her last day with the Rhode Island Division of Insurance. She expressed gratitude for the opportunity to serve, the camaraderie developed through NAIC work, and the friendships formed through the Working Group.

Having no further business, the Adjuster Licensing (D) Working Group adjourned.

Draft: 8/3/26

Adjuster Licensing (D) Working Group
Virtual Meeting
June 25, 2026

The Adjuster Licensing (D) Working Group of the Producer Licensing (D) Task Force met June 25, 2026. The following Working Group members participated: Rachel Chester, Chair (RI); Lorie Gasior, Vice Chair (LA); Kayla Erickson (AK); Charlene Ferguson (CA); Monicka Richmeier (KS); Jill Huisken (MI); Vanessa C. Miller (MS); Vanessa DeJesus (NM); Courtney Khodabakhsh (OK); Michael Fissel (PA); Jodie Delgado (TX); Randy Overstreet (UT); Richard Tozer (VA); and Lisa Hastings (WY).

1. Discussed its 2026 Priorities

Chester said the Working Group received materials on the Designated Home State (DHS) solution and would review comments by topic, focusing on the DHS, home state, and staff or company adjuster definitions.

Chester said Minnesota proposed a clearer DHS definition that identifies qualifying states or territories and requirements for examination, background checks, continuing education (CE), and ongoing licensure. Michigan's "ongoing licensure requirements" language and California's suggestion to define DHS after first use would be incorporated.

Chester said Michigan proposed revising the staff or company adjuster definition by removing "salaried" and considering "typically" or "direct." The Working Group agreed to remove "salaried" because employees may be paid hourly.

Huisken said Michigan was concerned that removing "direct" could broaden the exemption to contracted or subcontracted adjusters. Others supported using "employee of an insurer" and removing "direct" and "typically," while recognizing the need to distinguish employees from independent adjusters.

Chester said California proposed that an independent adjuster hold only one DHS license. The Working Group recognized the concern but noted limited exceptions may exist for line-of-authority differences or situations requiring both resident and DHS licenses.

Chester said DHS shopping and California's related "only" suggestion could be addressed in a drafting note clarifying that a DHS is not a substitute for an available resident or DHS line of authority.

Chester said California and South Carolina identified missing words in Section 7(B), and "meet the" would be added. She also said "exam" would be replaced with "examination" throughout the document, while California's CE comments would be tabled because that section was not under review.

Chester said the Securities & Insurance Licensing Association (SILA) suggested removing "or physically located" from the home state definition, but state insurance regulators wanted to prevent the use of business addresses as home states when individuals do not physically work there.

Chester said Old Republic Title suggested adding staff company adjusters to Section 4's license exception. However, she did not recommend the change because some jurisdictions license staff adjusters, and Section 1 drafting notes appeared to address the issue.

Gasior said the Working Group should use “employee,” remove “typically” and “direct,” and include a drafting note explaining the intent and related concerns.

Chester said additional meetings had been scheduled for August, September, and October, with the next meeting on July 15. She asked Greg Welker (NAIC) to send chat comments to Chester and Gasior for review.

Having no further business, the Adjuster Licensing (D) Working Group adjourned.

Draft: 6/29/26

Adjuster Licensing (D) Working Group
Virtual Meeting
May 27, 2026

The Adjuster Licensing (D) Working Group of the Producer Licensing (D) Task Force met May 27, 2026. The following Working Group members participated: Rachel Chester, Chair (RI); Lorie Gasior, Vice Chair (LA); Kayla Erickson (AK); Charlene Ferguson (CA); Monicka Richmeier (KS); Jill Huisken (MI); Vanessa C. Miller (MS); Vanessa DeJesus (NM); Courtney Khodabakhsh (OK); Michael Fissel (PA); Jodie Delgado (TX); Randy Overstreet (UT); Richard Tozer (VA); and Lisa Hastings (WY).

1. Discussed its 2026 Priorities

Chester said priorities for the year include the designated home state (DHS) roadshow led by her and Gasior, focusing on collaboration for DHS front-end validation. She said that she and Gasior are actively reaching out to all jurisdictions to discuss DHS front-end validation, though a few states remain to be contacted due to bandwidth and contact issues. Outreach will continue, and producer licensing directors should have received an invitation from the National Insurance Producer Registry (NIPR) for a solutioning webinar presenting DHS front-end validation options. Chester said the collaborative efforts over the past years have led to technical conversations and the upcoming NIPR webinar, which all regulators are encouraged to attend.

Gasior said that during the Working Group's April 22 meeting, there was a suggestion to review the Independent Adjuster Reciprocity Best Practice Guidelines found in the S*tate Licensing Handbook* appendix. Gasior said that the document, prepared 15 years ago, focused on achieving uniformity in licensing and recommended amending the guidelines to include the definition of "designated home state" and "company or staff adjuster." Gasior said that the current guidelines only briefly address the concept of DHS and proposed amending them to clarify this definition, noting that ambiguity in the existing language has led to confusion.

Gasior said the 2011 appendix's suggested definition is that a designated home state is one in which the adjuster does not maintain a principal place of residence or business but qualifies for the license as if they were a resident. Gasior said the suggestion for the Working Group is to revise the *Independent Adjuster Licensing Guideline* (GL 1224), adopt definitions, and establish a gold standard for DHS. She said the intention is to revise the definition of DHS, emphasizing the importance of focusing efforts on addressing immediate needs rather than making broad revisions to all guidelines. She also noted that this amendment provides an opportunity to define what qualifies as a designated home state and to set the gold standard.

Gasior said that she and Chester plan to prepare an initial revised draft to be circulated to the Working Group and posted on its web page for comment. She said the draft and comments received will be discussed during the Working Group's upcoming meeting in June.

Having no further business, the Adjuster Licensing (D) Working Group adjourned.

Draft: 6/29/26

Adjuster Licensing (D) Working Group
Virtual Meeting
April 22, 2026

The Adjuster Licensing (D) Working Group of the Producer Licensing (D) Task Force met April 22, 2026. The following Working Group members participated: Rachel Chester, Chair (RI); Lorie Gasior, Vice Chair (LA); Kayla Erickson (AK); Charlene Ferguson (CA); Monicka Richmeier (KS); Jill Huisken (MI); Vanessa Miller (MS);Vanessa DeJesus (NM); Courtney Khodabakhsh (OK); Michael Fissel (PA); Jodie Delgado (TX); Randy Overstreet (UT); Richard Tozer (VA); and Lisa Hastings (WY).

1. Adopted its March 18 Minutes

The Working Group met March 18 and took the following action: 1) discussed its 2026 priorities.

Khodabakhsh made a motion, seconded by Erickson, to adopt the Working Group's March 18 minutes *(see NAIC Proceedings – Spring 2026, Producer Licensing (D) Task Force, Attachment Two)*. The motion passed unanimously.

2. Discussed its 2026 Priorities

Chester said the next agenda item focuses on solving issues related to designated home states (DHS). Chester said the Working Group has made progress toward a consensus on eliminating manual verification processes for DHS selection and outlined ongoing efforts. The Working Group discussed the need for consistent language and understanding across all jurisdictions.

Chester said existing business rules have reduced manual work but advocated for enhanced front-end validation, referencing past surveys and initiatives. She said it is necessary to remember the importance of direct communication with all participants to ensure uniform terminology and expectations.

Gasior said the initial step was allowing applicants to select only from states that self-report as a DHS, followed by establishing a "DHS gold standard reciprocity agreement." She said this standard aims to eliminate redundant continuing education (CE) requirements, exams, and state-specific questions, improving the licensing process for adjusters.

Chester said for clarification, while some state-specific questions remain, particularly regarding resident reciprocity, the current focus is strictly on DHS status.

Gasior said reviewing the historical context for the DHS framework, noting its inception over 20 years ago to address licensing gaps for states that do not license adjusters. Gasior said that early implementation distinguished between resident and non-resident licenses, but subsequent changes led to ambiguity in reporting and tracking DHS licenses. The ability for individuals to change their DHS introduced additional reciprocity challenges.

Gasior said that despite efforts to streamline exam requirements, reciprocity is now limited to certain DHSs, and some states never adopted or recognized the DHS concept. Gasior referenced supplemental charts detailing state reciprocity practices, noting the complexity and variability in acceptance of DHS licenses.

Gasior said her suggestion is to create a gold standard for DHS and that states should require an exam, a national background check, and ongoing CE. She identified elements as common determinants of whether states accept

DHS licenses and cited Alaska's recent adoption of similar provisions as an example of gold standard implementation.

Gasior said there is no clear definition of DHS in the existing guidelines, suggesting that states consider a pact such as the CE Reciprocity Agreement. She encouraged further discussion on whether to formalize the gold standard within guidelines. The Working Group discussed and agreed on the need to provide a DHS definition. Chester said it is important to follow reciprocal arrangements, even among states that do not meet the gold standard.

Tozer said Virginia contributed by questioning the mechanism for defining DHS under the guidelines and by highlighting legislative considerations in his jurisdiction.

Gasior said that updating guidelines may require significant effort and suggested that individual states review their practices to help standardize the approach. Gasior questioned the group's willingness to formalize the gold standard and incorporate it into existing frameworks.

Chester said that guidelines serve as recommendations and that formal code changes represent a substantial challenge. The Working Group discussed and agreed to continue discussions on processing and application issues rather than pursuing statutory reforms.

Chester said there are challenges in relying on other regulators' reporting for reciprocity decisions, particularly when states differ on CE and background check requirements. She said Rhode Island's recent changes to CE requirements have affected reciprocity with other states. She said the suggestion is to use a mechanism similar to CE reciprocity agreements that requires commissioner approval and signatures.

Tozer said there could be complexity in such agreements and recommended amending guidelines as a more practical approach.

Chester said there is commissioner support for relieving processing burdens in insurance departments and compliance divisions, citing previous blessings from committee chairs. She said the Working Group is committed to continuing efforts toward technical solutions.

Gasior said it is necessary to review the guidelines, which have not been examined in two decades, and proposed reaching consensus within the Working Group on DHS definitions and standards to facilitate revisions.

Delgado said it may be necessary to differentiate between reciprocity for DHS licenses and resident licenses and suggested that both types should be held to substantially similar requirements.

Gasior responded that DHS selections involve an element of choice and recommended standardizing the options available to applicants to prevent forum shopping for the easiest licensing path.

Delgado said she has concerns about broader guideline reforms and questioned the prevalence of states that lack fingerprint-based background checks. The Working Group discussed and acknowledged discrepancies in fingerprinting between producers, public adjusters, and independent adjusters.

Huisken said that while background checks are conducted, they do not carry the weight of FBI reports and are not the basis for licensing decisions. The speaker emphasized continuing education as a significant factor and described legislative barriers to implementing fingerprinting in Michigan.

The Working Group discussed the importance of ongoing home-state monitoring, including the use of wrap-back subscriptions for notifications of arrests or changes in applicants' records. Regulators addressed the acceptance of national background checks for applicants from states without DHS provisions, referencing approved lists maintained by regulatory bodies. Additionally, it was confirmed that 25 jurisdictions do not conduct fingerprinting, underscoring the need for continued discussions on the gold standard. The group noted that content validation and gold standards are separate but related topics that require further attention.

Chester said the Working Group also needs to examine DHS business entity licensing, noting limited instances of non-resident business entity licenses in Rhode Island and the lack of clear DHS guidance for business entities.

Delgado said that Texas does not offer DHS licenses to business entities but does license qualified non-residents, specifying that Texas authorization is limited to state jurisdiction and not DHS designation.

Gasior said that Louisiana allows agencies to designate it as their home state, recognizing the challenges posed by the small number of states requiring adjuster business entity licenses. Gasior acknowledged the lack of exam or fingerprinting requirements for agency licenses and the need to provide a licensing mechanism for electronic processing.

The Working Group discussed and compared state practices regarding DHS licensing for business entities, noting that some states may not issue DHS licenses to business entities but do license qualified non-residents with state-specific authorization, while other states permit agencies to designate them as their home state. The Working Group also highlighted the limited number of states requiring adjuster business entity licenses, the absence of exam or fingerprinting requirements for agency licenses in some jurisdictions, and the need for efficient electronic licensing mechanisms.

Chester said she has addressed the recent implementation of CE requirements in Rhode Island, reporting questions, and concerns from licensees regarding compliance timelines and reciprocity with other states. Chester clarified the process for reviewing transcripts and establishing CE compliance and provided information on course group distinctions and accommodations made for adjuster and property/casualty (P/C) categories.

Chester said she would request guidance from the Working Group members on CE credit allocation and expressed openness to offline feedback.

Having no further business, the Adjuster Licensing (D) Working Group adjourned.

Draft: 8/4/26

Producer Licensing Uniformity (D) Working Group
Virtual Meeting
July 21, 2026

The Producer Licensing Uniformity (D) Working Group of the Producer Licensing (D) Task Force met July 21, 2026. The following Working Group members participated: Kevin Schlautman, Chair (NE); Jill Huisken, Vice Chair (MI); Kayla Erickson (AK); Charlene Ferguson (CA); Monicka Richmeier (KS); Shelley Taylor-Barnes (MD); Angela Hatchell (NC); Susan Daou (ND); Vanessa DeJesus (NM); Timothy Schirmer (OH); Courtney Khodabakhsh (OK); Mariel Garcia (RI); Tony Dorschner (SD); Randy Overstreet (UT); Richard Tozer (VA); Nicole Rayl (WA); Melody Esquivel (WI); and Lisa Hastings (WY).

1. Adopted its June 16 Minutes

The Working Group met June 16 and took the following action: 1) adopted its April 17 minutes; 2) discussed Chapter 13—Temporary Licenses of the *State Licensing Handbook* (Handbook); and 3) received an update on Uniform Licensing Standards (ULS) charts.

Fergusen made a motion, seconded by Rayl, to adopt the Working Group's June 16 minutes. The motion passed unanimously.

2. Discussed Chapter 19—Bail Bond Agents of the Handbook

Schlautman said the meeting's primary agenda item was to begin review of Chapter 19—Bail Bond Agents of the Handbook. He noted that the Working Group finalized Chapter 13—Temporary Licenses during its June 16 meeting and that he and Huisken prepared draft language following that discussion.

The Working Group discussed Michigan's and Ohio's comments on Chapter 19, including how best to update outdated federal immigration terminology and form references while avoiding language that could become obsolete.

Michigan's comments were described as technical, rather than substantive, and intended to update department names and form references. The Working Group discussed using broader language, such as "relevant federal authorities," or referencing a current form or successor equivalent. Schlautman said he and Huisken would revise the language to retain useful form references while avoiding outdated terminology.

The Working Group discussed Ohio's wording edits, including clarifying references to bail bond agents and insurers, changing "and" to "or" where appropriate and using "bail bond agent" consistently throughout the chapter.

The Working Group also discussed whether the Handbook's power-of-attorney language remains accurate, as state practices vary regarding whether powers of attorney are used and whether the bail bond agent, bail bondsman, or insurer files them with the court.

Working Group members provided state-specific examples. North Carolina licenses professional bondsmen, surety bondsmen, and bail bond runners. Nevada requires bail bond agents to register with the county sheriff's office and court and provide a power-of-attorney form. Kansas has a bail bond line of authority under the insurance producer license, and Virginia licenses surety bail bondsmen through the Virginia Bureau of Insurance and requires the bail bondsman, not the insurer, to file the power of attorney with the court.

The Working Group discussed whether to remove detailed power-of-attorney language or revise it to state generally that bail bond agents, bail bondsmen, and insurers should comply with applicable state filing requirements. Members agreed broader language would avoid attempting to address every jurisdiction. The Working Group agreed to simplify the paragraph by retaining general introductory language and adding a reference to state-specific requirements. States with bail bond licensing were asked to provide relevant information to Greg Welker (NAIC) so the Working Group can determine whether further revisions are needed.

The Working Group discussed possible research resources, including a state survey, Securities & Insurance Licensing Association (SILA) bail bondsmen charts, and the NAIC compendium, while noting the Handbook language should remain general.

Schlautman said there were no further comments regarding Chapter 19. The chapter changes will be posted and distributed, and the next meeting will begin discussion of Chapter 24—Managing General Agents. He said the August meeting will also address ULS survey results to identify possible Working Group action and next steps.

Schlautman said three chapters remain after Chapter 19, including Chapter 24—Managing General Agents, and the Working Group may later consider adding a stand-alone chapter on pharmacy benefit managers (PBMs).

Having no further business, the Producer Licensing Uniformity (D) Working Group adjourned.

Draft: 8/4/26

Producer Licensing Uniformity (D) Working Group
Virtual Meeting
June 16, 2026

The Producer Licensing Uniformity (D) Working Group of the Producer Licensing (D) Task Force met June 16, 2026. The following Working Group members participated: Kevin Schlautman, Chair (NE); Jill Huisken, Vice Chair (MI); Kayla Erickson (AK); Charlene Ferguson (CA); Monicka Richmeier (KS); Shelley Taylor-Barnes (MD); Vanessa Miller (MS); Angela Hatchell (NC); Susan Daou (ND); Vanessa DeJesus (NM); Timothy Schirmer (OH); Courtney Khodabakhsh (OK); Mariel Garcia and Rachel Chester (RI); Tony Dorschner (SD); Randy Overstreet (UT); Richard Tozer (VA); Nicole Rayl (WA); Melody Esquivel (WI); and Lisa Hastings (WY).

1. Adopted its April 17 Minutes

The Working Group met on April 17 and took the following action: 1) discussed Chapter 12—Business Entities and Chapter 13—Temporary Licenses of the *State Licensing Handbook*.

Miller made a motion, seconded by Chester, to adopt the Working Group's April 17 minutes. The motion passed unanimously.

2. Discussed Chapter 13—Temporary Licenses of the *State Licensing Handbook*

Schlautman said the Working Group would continue with comments submitted by states regarding Chapter 13—Temporary Licenses. He noted that several comments overlapped, particularly regarding whether the current language too narrowly suggests that temporary licenses apply only when a producer's business will no longer exist, rather than also applying when business is transferred or continued under another licensed producer.

Huisken said the Working Group should consider whether other states have proposed changes to the paragraph because the *Producer Licensing Model Act* (#218) provides multiple examples and does not apply only to circumstances involving the death of a producer. She said that the language should account for other circumstances, including military service and unusual situations, such as COVID-19, in which a temporary licensing authority became necessary to maintain access to insurance services.

Schlautman said Maine submitted comments raising concern that the existing paragraph made temporary licensing appear limited to survivors of deceased producers, even though the model also includes military service and other circumstances. He said a more general definition may better encompass the examples in the model and avoid suggesting that the authority is limited to only one type of situation.

Randy Helder (NAIC) said terminology such as "insurance director" and "insurance commissioner" would likely be reviewed for consistency during the third-party standards review process, and that appropriate corrections would be made in accordance with applicable drafting standards.

Khodabakhsh said Maine's formatting suggestion appeared appropriate because Model #218 contains four points under temporary licensing, including a point addressing other circumstances serving the public interest. She said the Working Group may need to revise the handbook language to reflect the correct number of examples and convert the relevant sentence into a fourth bullet point.

Schirmer said the proposed fourth point in the submitted comments should likely consist only of the first sentence, addressing other circumstances serving the public interest. He explained that the following sentence closely aligns with Section B of the Model #218, which addresses limitations on authority, and therefore should not necessarily be included as part of the fourth example.

Schlautman said the Working Group should consider whether the handbook should more closely mirror Model #218, including the four temporary licensing examples and any relevant restrictions. He said that the model includes authority for limitations, such as suitable sponsorship requirements, but questioned whether the handbook should remain generic or provide more detailed guidance.

Huisken said the existing language already alludes to limitations, including a 180-day period and authority for the commissioner to limit the scope of a temporary license. She said she favored retaining flexibility because state codes vary and circumstances may require different approaches. She also said the COVID-19 experience demonstrated the need for long-term guidance for new licensing directors when temporary licensing must be used during unusual or emergency conditions.

Schirmer said the Working Group should be cautious about changing the 180-day limitation because Model #218 expressly states that a temporary insurance producer license may be issued for a period not to exceed 180 days. He said changing the wording to make the limitation optional could materially alter the meaning of the model language.

Schlautman said Texas's comments described temporary licenses as a regular occurrence that may be issued outside emergency circumstances. He summarized that Texas requires a higher application fee, fingerprinting, a background check, a sponsor, and 40 hours of training within 30 days of licensure and allows conversion to a permanent license if the applicant passes the examination within the 180-day active license period.

Schlautman said Nebraska uses a similar concept through a training or apprentice license, which allows individuals to begin learning about insurance while preparing for the licensing examination. He asked whether other states had similar license types and whether training or apprentice licenses should be addressed in the handbook or treated separately from the Model #218 temporary producer license framework.

Erickson said Alaska has a trainee license for adjusters but does not have a temporary or apprentice license for producers. She said Alaska supported making the opening definition more generic and noted that Alaska's statute does not allow temporary licenses to extend beyond 180 days, though she recognized that the handbook applies more broadly than Alaska.

Schirmer said the opening language could be simplified by stating that the commissioner may issue a temporary license in specific or limited circumstances, rather than listing all reasons in the introductory paragraph. He said the detailed reasons are already included in the list of examples, so the introduction should remain broad and concise.

Schlautman said Model #218 states that the insurance commissioner may issue a temporary insurance producer license for up to 180 days without requiring an examination if the commissioner determines that the license is necessary to serve an insurance business. He said that language may provide a cleaner, more generic definition than the current handbook language and could replace the first two paragraphs, while preserving the structure of the existing section.

Huisken said she liked the structure of the Model #218 language but wanted the handbook to provide additional guidance rather than simply copy the model. She said the handbook should note that a temporary license may be limited in scope by the insurance commissioner, particularly for states that require sponsors or impose additional restrictions.

Schlautman said the Working Group appears to favor a generic approach that would keep the handbook language broad and avoid adding too much detail about specific restrictions such as sponsorship. He said that, in some situations, such as a surviving spouse briefly handling an agency after an owner's death, a sponsorship requirement may not be necessary because the temporary licensee may only be concluding existing business rather than soliciting new business.

Huisken said it may be beneficial if the Working Group understands whether states provide advance notice to temporary license holders before expiration, such as 45 or 14 days prior, or whether the license simply expires at the end of the stated period. She said this information could help determine whether additional guidance should be included.

Schlautman said Nebraska issues apprentice or temporary licenses for a specific period with an expiration date identified at issuance. He said Nebraska does not appear to send an additional automated reminder before expiration, and that the licensee is informed at the outset of the license period and the end date. The Working Group discussed, noting that some provide advance notices while others rely on the expiration date stated at issuance.

Schlautman said that he and Huisken would prepare draft revisions reflecting the discussion, including a more generic definition, the addition of a fourth example consistent with Model #218, and consideration of how to address the 180-day limitation. He said he would also review other states' temporary license provisions to better understand how states handle the issue.

3. Received an Update on ULSCharts

Schlautman said he also had an update on the Uniform Licensing Standards (ULS) charts. He reported that 50 state responses had been received and compiled into a summary document outlining areas of compliance. He said the document would be posted on the Working Group webpage for review and that future meetings may focus on areas with lower compliance and potential opportunities for improvement.

Having no further business, the Producer Licensing Uniformity (D) Working Group adjourned.

Draft: 6/30/26

Producer Licensing Uniformity (D) Working Group
Virtual Meeting
April 21, 2026

The Producer Licensing Uniformity (D) Working Group of the Producer Licensing (D) Task Force met April 21, 2026. The following Working Group members participated: Kevin Schlautman, Chair (NE); Jill Huisken, Vice Chair (MI); Kayla Erickson (AK); Charlene Ferguson (CA); Monicka Richmeier (KS);Shelley Taylor-Barnes (MD); Angela Hatchell (NC);Susan Daou (ND); Vanessa DeJesus (NM); Lindsey Jones (OH); Courtney Khodabakhsh (OK); Mariel Garcia (RI); Tony Dorschner (SD); Randy Overstreet (UT); Richard Tozer (VA); Nicole Rayl (WA); Melody Esquivel (WI); and Lisa Hastings (WY).

1. Adopted its March 17 Minutes

The Working Group met March 17 and took the following action: 1) adopted its Feb. 17 minutes; 2) discussed Chapter 12 Business Entities of the *State Licensing Handbook*; and 3) discussed Uniform Licensing Standards (ULS).

Miller made a motion, seconded by Chester, to adopt the Working Group's March 17 minutes (*see NAIC Proceedings – Spring 2026, Producer Licensing (D) Task Force, Attachment Three*). The motion passed unanimously.

2. Discussed Chapter 12—Business Entities of the *State Licensing Handbook*

Schlautman said that during its March 17 meeting, the Working Group began reviewing Chapter 12—Business Entities of the *State Licensing Handbook*. California and Ohio submitted comments, which included grammatical and language edits, replacing year-specific references with more general language, revising reciprocity language, clarifying requirements regarding Articles of Incorporation for name changes, business name approval requirements, designated responsible licensed producer (DRLP) language, and appointment-related requirements. He said that the agreed-upon edits had been incorporated into the draft distributed with the meeting materials.

Schlautman said the Working Group received three additional comment submissions from Maine, Michigan, and Nevada, and invited discussion of those comments.

Schlautman said Maine's recommendation is to replace the term "producer" with "individual" throughout portions of Chapter 12, noting that the Uniform Business Entity Application may be used for license types other than producer business entities. The Working Group discussed that the *Producer Licensing Model Act* (#218) uses the term "producer," and the reciprocity provisions discussed in the chapter are tied specifically to producer licensing requirements. The Working Group agreed to keep the language as "producer."

Huisken said Michigan recommended removing the language stating that affiliation and branch office information collected at the time of application is rarely used. She also noted that affiliation information has become increasingly important for identifying ownership relationships and monitoring compliance. The Working Group discussed and agreed on the change.

Roberts said Nevada's comments concern language, stating that a DRLP need not hold the same lines of authority as the business entity. He said the question is whether an individual licensed only in property/casualty (P/C) should be responsible for compliance involving life and health business conducted by the agency.

The Working Group discussed the role and responsibilities of the DRLP. Schlautman emphasized the importance of clarifying that the DRLP is responsible for compliance across all lines of authority held by the business entity. Huisken referenced Michigan's DRLP experience, noting that requiring only one DRLP had streamlined regulatory oversight and enforcement without significant issues in holding DRLPs accountable. Overstreet said that Utah mandates the DRLP to hold an insurance license and be responsible for agency compliance. Taylor-Barnes described Maryland's approach, in which DRLPs must possess all lines of authority maintained by the business entity, highlighting the need for line-specific expertise given varying regulatory requirements. Schlautman noted that because states differ in their approaches, further discussion would be necessary before making any revisions.

Schlautman said it is questionable whether language regarding business entity appointments should remain in Chapter 12 or be relocated to the appointment chapter. Participants shared perspectives on their respective appointment processes, emphasizing the distinction between appointment requirements and DRLP accountability. The Working Group agreed that appointment-related language should be relocated to the relevant chapter dedicated to appointments.

Schlautman said another comment for review concerns the language on nonresident business entities: "The NAIC legal department has studied this issue extensively and advised the Working Group that states should not require items such as articles of incorporation or proof of registration with the SOS as a pre-condition to licensing for nonresident BEs." He said the question is whether the language should state "should not" or be changed to "may not." The Working Group discussed and agreed to verify with the NAIC legal department.

Schlautman said another topic for the Working Group to discuss is the Secretary of State (SOS) registration. The Working Group discussed resident and nonresident business entity registration requirements and the extent to which insurance departments should verify registration with a SOS or similar business registration authority. The Working Group agreed that additional review of the legal guidance would be helpful before further revisions are considered.

Schlautman said he will work with Huisken and the NAIC to review and apply the edits discussed today. He said the updated revised chapter would be distributed and posted on the Working Group webpage. He said the Working Group will begin reviewing Chapter 13—Temporary Licenses at the next Working Group meeting in May.

3. <u>Discussed ULS</u>

Schlautman said the Working Group has been collecting updated state Uniform Licensing Standards (ULS). He said that to date, it has collected 48 state responses. He said NAIC committee support will reach out to the remaining states to achieve all state responses. He said the charts will be compiled, and the Working Group will review to determine low-compliance areas.

Having no further business, the Producer Licensing Uniformity (D) Working Group adjourned.

Draft: 8/4/26

Uniform Education (D) Working Group
Virtual Meeting
July 8, 2026

The Uniform Education (D) Working Group of the Producer Licensing (D) Task Force met July 8, 2026. The following Working Group members participated: Jodie Delgado, Chair (TX); Kayla Erickson, Vice Chair (AK); Charlene Ferguson and Dillon Gingras (CA); Monicka Richmeier (KS); Lorelei Brillante (MD); Jill Huisken (MI); Vanessa C. Miller (MS); Kevin Schlautman (NE); Vanessa DeJesus (NM); Lindsey Jones (OH); Lindsey Piatt (OK); Rachel Chester (RI); Tony Dorschner (SD); Richard Tozer (VA); and Nicole Rayl (WA). Also participating were: Lorie Gasior (LA), Sara Stanberry (IL); and Emily Knight (SC).

1. Adopted its May 13 Minutes

The Working Group met May 13. During this meeting, it took the following action: 1) adopted its April 15 minutes; 2) discussed the standardized instructor form; and 3) discussed the Continuing Education Reciprocity (CER) Agreement.

Chester made a motion, seconded by DeJesus, to adopt the Working Group's May 13 minutes. The motion passed unanimously.

2. Adopted Appendix C of the CER Agreement

Delgado said Appendix C of the CER Agreement had been circulated, reviewed on May 13, revised, and redistributed on June 9. She said the main revision was to change "monitor" to "proctor" and referenced the NAIC standardized definition of "proctor" to avoid future conforming edits if the definition changes. Delgado said no additional comments or questions had been received since the revised draft was distributed.

Ferguson made a motion, seconded by Schlautman, to adopt the revisions to CER Agreement Appendix C. The motion passed unanimously.

3. Discussed FEINs on Provider Applications

Erickson asked whether tax identification numbers or federal employer identification numbers (FEINs) should be required on continuing education provider applications. She noted that Alaska is a State Based Systems (SBS) and that SBS provider applications do not currently require this information.

Gingras said California requires the FEIN on provider applications and would support making that change. Delgado said Sircon appears to require the information for Texas and, possibly, more broadly within Sircon states. Delgado asked SBS states whether they request the FEIN after receiving an application without one, or whether they approve applications without the FEIN.

Stanberry said Illinois requested that SBS make the FEIN field required and was told the change would need approval as an SBS enhancement. She said FEINs are needed to link provider numbers to legal entities and recommended that supportive SBS states submit similar requests.

Delgado said she did not understand what the downside would be to requiring the FEIN and asked whether any states had concerns. The Working Group discussed and agreed.

Delgado said the issue may not be a formal charge of the Working Group but encouraged SBS states that support the requirement to contact SBS and request the enhancement.

4. Discussed Nonresident Course Submissions and Home-State Approval

Delgado introduced the issue of nonresident course submissions lacking home-state approval, citing an example of a Virginia-based provider whose course was reviewed in Illinois and later submitted in Kansas.

Gingras said California does not require providers to return to the home state for approval. Brillante said Maryland asks questions at renewal when the designated home state changes or home-state approval is absent, focusing on whether a CER Agreement state performed a substantive review and whether the reviewing state remains consistent.

Chester and Stanberry said Rhode Island and Illinois would accept a substantive review from another state that conferred home-state status, but neither state would allow its own approval of a nonresident provider's course to be used as home-state approval for reciprocal purposes.

Knight said South Carolina requires home-state approval unless the provider provides a valid reason for its unavailability, such as home-state hour limits. In that case, South Carolina may accept approval from another state that conducted a substantive review. Delgado noted Oklahoma appeared to follow a similar approach.

Gasior said Louisiana does not treat such approvals as home-state approvals; instead, Louisiana approves the course only for Louisiana. She said Louisiana's approval letter does not currently distinguish home-state approval but includes course approval information, and the state has discussed adding more information in the future.

Brillante and Delgado said regulators may need clearer approval documentation or greater system visibility so co-regulators can determine whether an approval was based on home-state review, reciprocity, or substantive review.

Brillante said vendor record fields could help regulators identify home-state status, reciprocal or substantive review, nonresident course review, difficulty level, and approved hours. Delgado said consistent reporting and visibility would support the use of CER Agreements and help states make reciprocal decisions.

Erickson said Alaska, an SBS state, does not receive a standard approval letter through SBS and instead issues course-specific correspondence. Chester said Rhode Island requests provider documentation and may verify questionable information through online lookups, though availability and effort vary by system.

Brillante said Maryland, a Sircon state, can look up some SBS provider and course information, but noted regulators may need broader familiarity with other systems.

Stanberry said Illinois requires providers to submit documentation supporting reciprocal approval, such as a reciprocal agreement certificate, home-state approval, or a screenshot. If documentation is not provided, Illinois conducts a substantive review and does not issue a certificate of reciprocity to a non-Illinois provider.

Brillante said Maryland reviews screenshots carefully and requires current proof of approval, including a recent date stamp when course approvals do not expire. Delgado said states that require home-state validation should also ensure their own documentation clearly confirms home-state approval when granted.

Delgado said that if states require validation of home-state approval, they should also consider whether their own approval documentation consistently confirms home-state approval when granted. Delgado said Texas issues approval letters but does not expressly state whether the approval is a home-state approval, creating an opportunity for consistency and potential best practices.

Delgado said states may need to trust the reciprocity process while clearly distinguishing approvals based on reciprocity from those based on substantive review. She said clearer indicators would help states confirm home-state approval at renewal and improve consistency.

5. Discussed Appendix B to the CER Agreement

Delgado said Appendix B had been circulated in April with no comments received. She said it would be recirculated for additional review to gather suggested edits or concerns, with the goal of discussing it during the Working Group's next meeting.

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

Draft: 7/10/26

Uniform Education (D) Working Group
Virtual Meeting
May 13, 2026

The Uniform Education (D) Working Group of the Producer Licensing (D) Task Force met May 13, 2026. The following Working Group members participated: Jodie Delgado, Chair (TX); Kayla Erickson, Vice Chair (AK); Charlene Ferguson and Dillon Gingras (CA); Monicka Richmeier (KS);Lorelei Brillante (MD); Jill Huisken (MI); Vanessa C. Miller (MS); Vanessa DeJesus (NM); Lindsey Jones (OH); Lindsay Piatt (OK); Rachel Chester (RI); Tony Dorschner (SD); Richard Tozer (VA); and Lisa Taylor and Nicole Rayl (WA).

1. <u>Adopted its April 15 Minutes</u>

The Working Group met April 15. During this meeting, It took the following action: 1) adopted its March 11 minutes; 2) discussed the NAIC standardized instructor form; 3) discussed Appendix C of the Continuing Education Reciprocity (CER) Agreement; and 4) discussed CER form course difficulty levels .

Chester made a motion, seconded by DeJesus, to adopt the Working Group's April 15 minutes. The motion passed unanimously.

2. <u>Discussed the NAIC Standardized Instructor Form</u>

Delgado introduced the NAIC standardized instructor form, noting that the instructor approval guidelines had been adopted, but the form itself had not. She said the form had been posted for adoption the prior month, prompting additional discussion and feedback from RegEd on whether revisions were needed.

Huisken said Michigan added statutory background questions after an instructor was found teaching to the exam and providing exam-related questions. She said the change strengthened oversight and public protection, and Michigan now asks questions similar to those used for agent license applications.

Delgado noted that California, Michigan, New York, and South Carolina were identified as states that require or use similar background questions.

Gingras said California requires background questions on its instructor qualification form pursuant to the California Code of Regulations.

Richmeier said Kansas does not ask background questions because it lacks statutory authority to request extensive information about instructors. She noted that Kansas uses the State Producer Services (SPS) instructor application to approve instructors individually for additional courses, but it remains limited in what it may review.

Taylor said Washington asks background questions for program coordinators when changes occur, but she had not seen similar questions for instructors. She supported adding them to the uniform application, so applicants are on notice.

Brillante raised a procedural concern because the commissioners had approved the uniform instructor guidelines but not the form. The Working Group agreed that any revisions to forms should be compared with the approved guidelines to avoid conflicts.

Huisken said the uniform application does not include identifying information, such as date of birth or Social Security number, which would help distinguish applicants with common names when background questions or other checks are used.

Delgado said recent feedback raised the same concern and asked whether participants supported adding fields for date of birth and Social Security number (SSN). The Working Group agreed that identifying information would be helpful.

Delgado said the guidelines provide that instructors approved in their home state should be approved to teach the same course categories in reciprocal states, but Texas does not approve of instructors individually. She asked whether the guidelines should clarify how states should proceed when the home state does not conduct individual instructor approvals.

Huisken said Michigan reviews instructor submissions individually rather than relying on home-state approval, and she would confirm with Michigan education specialists whether reciprocal approvals are considered.

Gingras said California also reviews instructor submissions directly and does not rely on reciprocal instructor approval.

Taylor said Washington requires an instructor biography or résumé when a course is submitted, but its rules are less clear for subsequent instructors added to teach the same course. She said the issue may need to be reviewed by Washington's rules team.

Brandi Brown (RegEd) said RegEd submits instructor applications separately to each state using state-specific forms. She said a uniform application accepted by all states would be helpful, and adding two or three general background questions would not be overly burdensome. The Working Group discussed and agreed that this should be reviewed to include course categories when states approve continuing education (CE) instructors by category rather than by individual course.

Delgado said that from the discussions, Working Group members suggest adding National Producer Number (NPN), SSN, and date-of-birth fields; including course category options aligned with major lines and specialized topics such as annuities and Medicare; and seeking subject-matter expert (SME) assistance as revisions are developed.

Tozer said SPS or Vertafore representatives may be able to provide information about electronic instructor application forms used through Sircon or similar systems, which may need updates if the uniform form changes.

Delgado said that she would work with Ericson to review and determine draft edits to the instructor form.

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

Erickson said the next agenda item is to review Appendix C of the CER Agreement, which the Working Group's discussed during its April 15 meeting. She said the Working Group needed to revisit and, if possible, finalize language after receiving comments from multiple sources, including feedback from a Securities and Insurance Licensing Association (SILA) meeting regarding group-setting webinars. She said SILA's discussion indicated that, in group settings, continuing education providers use disinterested third parties in the room to monitor attendance. Erickson said the third party submits an affidavit with sign-in and sign-out sheets and does not receive credit, and asked whether that clarification should be included in Appendix C. The Working Group discussed and agreed that the language should be clarified so that future regulators and providers can understand how group-setting webinars work and how credit may be issued.

Taylor said the definition of “disinterested third party” should be strengthened because an administrator may not receive credit, yet still be subject to influence if the attendee is a supervisor or other person with authority over the administrator.

Delgado said the Working Group could revise Appendix C by splitting the relevant bullet to distinguish individual webinar participation from group settings and by requiring a disinterested third party to monitor attendance in group settings. The Working Group discussed and agreed.

Piatt said Oklahoma uses a proctor form that includes a proctor attestation and examples such as a human resources (HR) director, an attorney, a certified public accountant (CPA), or another licensed professional. Piatt said polling questions are easier to administer in individual webinars than in group webinars, where one person logs in for multiple attendees.

Delgado said the principal unresolved issue in Appendix C was the group-setting bullet and the definition of a disinterested third party, while other comments were largely grammatical. Delgado proposed that she and Erickson research language; Tozer provide relevant Virginia language; and a revised version be circulated before the next meeting.

Delgado said she will work with Erickson to draft initial revisions for the Working Group to review and provide comments before being opened for adoption.

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

Draft: 6/30/26

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, Dawn Ward, and Dillon Gingras (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). Also participating was Dawn Kilgore (ME).

1. Adopted its March 11 Minutes.

The Working Group met March 11 and took the following action: 1) adopted its Feb. 24 minutes; 2) discussed the Continuing Education Reciprocity (CER) Agreement; 3) discussed introductory statement guidelines; 4) discussed course approval letters; and 5) discussed pass rates.
DeJesus made a motion, seconded by Brillante, to adopt the Working Group's March 11 minutes (*see NAIC Proceedings – Spring 2026, Producer Licensing (D) Task Force, Attachment Six*). The motion passed unanimously.

2. Discussed the NAIC Standardized Instructor Form

Delgado said the next agenda item 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 its own instructor form due to regulatory requirements. The Working Group discussed California's form, including its specific requirements, qualifications, and details.

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

3. Discussed the NAIC CER Agreement—Appendix C

Erickson said the next agenda item is to discuss the CER Agreement—Appendix C. The Working Group has been reviewing Appendix C for potential edits, and there are questions about how active participation is verified in group settings.

Gingras said California requires 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 that, based on the discussions, there is a need to clarify terminology regarding monitors and other areas to support the requirements. DeJesus 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 state insurance regulators might not be aware of such practices due to limited visibility into roster submissions. Gingras said providers rarely inquire about group webinar offerings, suggesting the practice may be going unnoticed.

Delgado proposed clarifying language to ensure that each student has 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 little impact 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 that more editing was needed for this section.

Delgado said that in Texas, it is left to the provider's discretion, with providers subject to audits if issues arise. The Working Group discussed and agreed that polling questions are a best practice to include. Erickson said the current best practices were being captured and that further wordsmithing will be necessary.

Kilgore said there are concerns about verifying students' identities and license numbers, suggesting the need for further clarification on attendance monitoring. The Working Group discussed how states verify student identity for attendance. The Working Group agreed to solicit input from continuing education (CE) providers.

Delgado called on providers to share their processes, and Tozer emphasized the importance of understanding providers' practices to determine whether best practices should be included in guidelines. Delgado agreed and asked for final input before moving on. She confirmed with Kilgore 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. Discussed CER Form Course Difficulty Levels

Delgado said the next agenda item concerns 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 state insurance regulators should confirm and follow the provider’s designation across states.

Brillante said she would like feedback on third-party reviewers and whether vendors were audited for the quality of their reviews. 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 web page.

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