

## **PRODUCER LICENSING (D) TASK FORCE**

Producer Licensing (D) Task Force Aug. 12, 2025, Minutes

1033 Template (Attachment One)

Adjuster Licensing (D) Working Group Aug. 8, 2025, Minutes (Attachment Two)

Adjuster Licensing (D) Working Group July 10, 2025, Minutes (Attachment Three)

Adjuster Licensing (D) Working Group Apr. 2, 2025, Minutes (Attachment Four)

Producer Licensing Uniformity (D) Working Group Aug. 5, 2025, Minutes (Attachment Five)

Producer Licensing Uniformity (D) Working Group July 15, 2025, Minutes (Attachment Six)

Producer Licensing Uniformity (D) Working Group June 17, 2025, Minutes (Attachment Seven)

Producer Licensing Uniformity (D) Working Group May 20, 2025, Minutes (Attachment Eight)

Uniform Education (D) Working Group Aug. 6, 2024, Minutes (Attachment Nine)

Uniform Education (D) Working Group July 9, 2024, Minutes (Attachment Ten)

Uniform Education (D) Working Group June 18, 2024, Minutes (Attachment Eleven)

Uniform Education (D) Working Group May 7, 2024, Minutes (Attachment Twelve)

## Draft Pending Adoption

Draft: 8/18/25

Producer Licensing (D) Task Force  
Minneapolis, Minnesota  
August 12, 2025

The Producer Licensing (D) Task Force met in Minneapolis, MN, Aug. 12, 2025. The following Task Force members participated: Larry D. Deiter, Chair (SD); Sharon P. Clark, Vice Chair (KY); Heather Carpenter (AK); Mark Fowler represented by Jimmy Gunn (AL); Alan McClain represented by Lori Plant (AR); Ricardo Lara represented by Charlene Ferguson (CA); Karima M. Woods represented by Sheila Johnson-Parker (DC); Dean L. Cameron (ID); Vicki Schmidt (KS); Timothy J. Temple represented by Matthew Steward (LA); Marie Grant represented by Shelly Taylor-Barns (MD); Anita G. Fox represented by Michele Riddering (MI); Angela L. Nelson (MO); Mike Chaney represented by Vanessa C. Miller (MS); Mike Causey represented by Angela Hatchell (NC); Jon Godfread represented by Janelle Middlestead (ND); Eric Dunning (NE); Judith L. French (OH); Glen Mulready represented by Erin Wainner (OK); TK Keen represented by John Haworth (OR); Michael Humphreys represented by David Buono (PA); Elizabeth Kelleher-Dwyer (RI); Cassie Brown represented by Jessica Barta (TX); Scott A. White represented by Richard Tozer (VA); Patty Kuderer represented by Andrew Davis (WA); Nathan Houdek represented by Christina Keeley (WI); and Allan L. McVey represented by Gregory A. Elam and Robert Grishaber (WV).

### 1. Adopted its Spring National Meeting Minutes

Commissioner Clark made a motion, seconded by Director Dunning, to adopt the Task Force's March 25 minutes (see *NAIC Proceedings – Spring 2025, Producer Licensing (D) Task Force*). The motion passed unanimously.

### 2. Adopted the 1033 Waiver Template

Tozer said he led a small group of subject matter experts (SMEs) to revise the 1033 waiver template after the Spring National Meeting. The template was exposed for a 30-day public comment period ending July 18. Tozer said the following changes were made after the Spring National Meeting:

- **Section 1:** A drafting note was added to clarify the difference between the use of the term “waiver” and “written consent.”
- **Section 2:** This section was modified to indicate a person must seek a written consent in their home state but that a state may require a nonresident prohibited person to apply for a 1033 written consent if: a) the home state did not require 1033 written consent; or b) when the home state does not issue 1033 written consents on the same basis as the nonresident state. Tozer said this change was made because there can be situations when an applicant's home state does not, as a matter of regulatory policy, issue any waivers or a state limits the scope of its waivers to activities within its jurisdictions.
- **Section 3:** The drafting note to the definition of conviction was modified to clarify “states should not consider for written consent a person who has successfully completed deferred adjudication and has not been convicted of a qualifying felony”; and “States may include in the definition of ‘Conviction’ a plea in abeyance, a diversion, a sealed, or an expunged conviction.” Two drafting notes were added to the definition of felony. The first drafting note indicates the definition of felony varies according to state law. The second drafting note adds a cross-reference to Attachment C of the *NAIC Guidelines for State Insurance Regulators to the Violent Crime Control and Law Enforcement Act of 1994*, which provides guidance for evaluating which felonies involve “dishonesty or breach of trust.”
- **Application Form:** Questions 1 and 2, which ask about felony convictions and the details of a felony conviction, were combined into one question. There were also edits to the Section IV—Attachments, which address the submission of a letter of recommendation and a letter from an applicant's employer or prospective employer indicating they are aware of felony convictions.

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Ferguson said California supports the current draft of the template. In response to written comments from Delaware and a combined comment letter from the American Council of Life Insurers (ACLI), Finseca, and National Association of Insurance and Financial Advisors (NAIFA), Ferguson said the phrase “if applicable” needs to be retained in the Application Form because many 1033 applicants do not have an employer or prospective employer at the time they apply for the consent. Ferguson said the 1033 Consent Application Form should continue to require individuals with “nolo contendere pleas and no contest pleas” involving qualifying convictions. Ferguson said a state insurance regulator can use the no-contest plea even if the court suspends imposition of sentencing or places the defendant into a diversion program. Ferguson said California’s 1033 regulations expressly state that a no-contest plea equals a conviction. Ferguson said the only time the regulator may be unable to use a plea of no contest or even a plea of guilty is when the court refrains from entering a judgment or order formally adjudicating the defendant as guilty.

David Leifer (ACLI) said the the ACLI, Finseca, and NAIFA support the NAIC’s goal of simplifying the 1033 waiver process and developing uniformity, but they remain concerned about continued inclusion of nolo pleas in the draft template. Leifer said nolo and similar pleas like no contest are typically required for pre-trial diversion programs. These pleas are generally only available to first-time offenders charged with lesser offenses. Leifer said individuals who enter nolo pleas and other similar pleas are required to enter a diversionary program, which, if successfully completed, expunges an individual’s record and, therefore, no conviction has ever occurred. Leifer said the inclusion of nolo pleas could inadvertently increase the number of applicants required to go through a 1033 waiver and would run counter to the goals of diversion programs. Leifer said applicants still disclose these pleas in their applications and that state insurance departments are receiving these disclosures outside the 1033 consent process.

Hearing no additional comment, Tozer made a motion, seconded by Dunning, to adopt the revised 1033 waiver template (Attachment One). The motion passed, with North Carolina abstaining.

### 3. Adopted its Working Group Reports

#### A. Adjuster Licensing (D) Working Group

Director Dwyer said the Working Group met Aug. 8 (Attachment Two), July 10 (Attachment Three), and April 2 (Attachment Four). Director Dwyer said the Working Group continues to review suggested revisions to Chapter 18 —Adjusters of the *State Licensing Handbook*. The Working Group formed a regulator SME group to review issues surrounding adjuster-designated home state licensing and is developing a proposed set of standards for public discussion. The Working Group is discussing the development of a consistent set of standards that would provide greater licensing uniformity and reciprocity for states that license both company and independent adjusters.

#### B. Producer Licensing Uniformity (D) Working Group

Wainner said the Working Group met Aug. 5 (Attachment Five), July 15 (Attachment Six), June 17 (Attachment Seven), and May 20 (Attachment Eight). Wainner said the Working Group discussed the Uniform Licensing Standards (ULS) and state compliance with the standards. The Working Group continues to review suggested revisions to Chapter 9—Lines of Insurance, Chapter 10—Surplus Lines, and Chapter 11—Appointments of the *State Licensing Handbook*.

## Draft Pending Adoption

### C. Uniform Education (D) Working Group

Tozer said the Working Group met Aug. 6 (Attachment Nine), July 9 (Attachment Ten), June 18 (Attachment Eleven), and May 7 (Attachment Twelve). Tozer said the Working Group continues to review suggested revisions to Chapter 6—Prelicensing Education, Chapter 8—Testing Programs, and Chapter 14—Continuing Education of the *State Licensing Handbook*. The Working Group received a report from NAIC staff on 2024 exam pass rates, which have been published to the Working Group's web page. The Working Group distributed a survey regarding the 2024 continuing education (CE)/licensing exam best practices. It received 40 state survey responses and is working to get the remaining responses.

Director Cameron made a motion, seconded by Director Carpenter, to adopt the reports of the Adjuster Licensing (D) Working Group, Producer Licensing Uniformity (D) Working Group, and the Uniform Education (D) Working Group. The motion passed unanimously.

#### 4. Received a Report from NIPR

Director Deiter said the National Insurance Producer Registry (NIPR) Board of Directors meeting was held Aug. 10. For the first half of 2025, NIPR revenues were \$45.7 million, which is 6.2% over budget. Expenses were \$44.3 million, which is 3.5% over budget due to the increase in NIPR's revenue.

Laurie Wolf (NIPR) said significant progress has been made by expanding electronic solutions for states and industry (Name Change: implemented in 36 states, Designated Responsible Licensed Producer Change: implemented in 28 states, and Contact Change Request: implemented in 40 states for business entities). Wolf said NIPR continues to add new license classes, such as pharmacy benefit managers (PBMs) and adjusters. NIPR will launch a redesigned website (NIPR.com) this month.

Wolf said NIPR, in collaboration with the NAIC, completed its second producer licensing zone training with Midwest Zone training. Twelve of the 13 Midwest Zone states participated. Training will be scheduled in 2026 for the Southeast Zone and Northeast Zone. Wolf said the training provides an opportunity for state insurance regulators to address industry issues, engage in peer dialogue, and discuss best practices for producer licensing.

Wolf said NIPR assisted with the South Dakota State Based System (SBS) conversion, bringing on new license classes, appointment renewals, and streamlined licensing processes. NIPR assisted Maine with its adjuster licensing processes and conducted training in conjunction with SBS in Puerto Rico and the Virgin Islands.

#### 5. Discussed Other Matters

As part of the NAIC's proposed 2026 budget, Director Deiter said there is a proposal to increase the SBS CE transaction fee. The current CE transaction fee has remained unchanged at \$1 per course since 2010. The proposal is for a 50% increase, or \$0.50, bringing the total fee to \$1.50 per reported CE hour. This aligns with the cumulative increase in the consumer price index from 2010 through August of this year. Since most producers are required to complete 24 hours of CE every two years, Director Deiter said the total increase would be \$12 over two years, or \$6 annually per producer. If approved by the NAIC Membership as part of the 2026 budget proposal, the new fee will take effect on Feb. 1, 2026.

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

SharePoint/NAIC Support Staff Hub/Committees/D CMTE/2025 Summer/PLTF/National Meeting

*Adopted by the Producer Licensing (D) Task Force, Aug. 12, 2025*

## **Template for 1033 Written Consent Process**

### *Suggestion on How to Make the 1033 Written Consent Process Effective and Efficient*

#### **1. Introduction**

- A. Federal law provides penalties for a person who: (a) has been convicted of a felony involving dishonesty or breach of trust; and (b) willfully engages in the business of insurance affecting interstate commerce, unless the person receives written consent from the state insurance regulatory official with appropriate jurisdiction. See, Violent Crime Control and Law Enforcement Act of 1994, 18 U.S.C. §§1033 and 1034.
- B. A person who has not obtained written consent and who has been convicted of a felony involving dishonesty or breach of trust is a “prohibited person.” A prohibited person who engages in the business of insurance faces possible federal criminal and civil action.
- C. Federal law also penalizes those in the insurance industry who willfully allow prohibited persons to engage in the business of insurance. They must notify the [Insert Jurisdiction Insurance Department] (“the Department”) in writing of an employee or agent who is a prohibited person. Insurance entities that already employ a prohibited person who does not have a written consent shall take the necessary steps to have the individual apply for a 1033 written consent.

Drafting note: Any state that has enacted the NAIC *Insurance Fraud Prevention Model Act* (#680) should be aware that Subsection 3.C (1) of the model states, “A person convicted of a felony involving dishonesty or breach of trust shall not participate in the business of insurance.”

Drafting note: The term “waiver” as used in this document refers to the process of a prohibited person seeking a “written consent.” The term “written consent” as used in this document refers to the state insurance regulatory official with appropriate jurisdiction allowing a prohibited person to engage in the business of insurance.

#### **2. A Prohibited Person Must Seek Written Consent**

- A. A prohibited person must seek written consent in their Home State prior to engaging in the business of insurance. The process for obtaining written consent is set forth in this document. The process shall be made available to a person with a qualifying felony conviction seeking an insurance license or who wishes to be employed in the business of insurance in a non-licensed capacity in [Insert Jurisdiction]. Nonresident prohibited person applicants may not have to apply for 1033 written consent if they have received 1033 written consent in their Home State. States may require a nonresident prohibited person to apply for 1033 written consent if: (a) the Home State did not require 1033 written consent; or (b) when the Home State does not issue 1033 written consents on the same basis. The [Insert Jurisdiction Insurance Department] may require the prohibited person to release any information the [Insert Jurisdiction Insurance Department] may request as part of the investigation, including but not limited to, records of former employment, state and federal tax returns, business records, and banking records.

#### **3. Definition of Relevant Terms**

- A. Breach of trust: A wrongful act, use, misappropriation, or omission with respect to any property or fund which has been committed to a person in an official fiduciary capacity or some other relationship based on trust; or

*Adopted by the Producer Licensing (D) Task Force, Aug. 12, 2025*

the misuse of one's official fiduciary, or other position based on trust, to engage in a wrongful act, use, misappropriation, or omission. (For example, a fiduciary relationship is present in a lawyer/client relationship, physician/patient relationship, or caregiver/elder adult relationship.)

- B. Business of insurance: The writing of insurance, adjusting claims, or the reinsuring of risks, by an insurer, including all acts necessary or incidental to such writing or reinsuring and the activities of persons who act as, or are, officers, directors, agents, or other licensed or unlicensed employees of insurers or who are other persons authorized to act on behalf of such persons, otherwise required under 18 U.S.C. § 1033.
- C. Conviction: Includes but is not limited to having been found guilty by verdict of a judge or jury, having entered a plea of guilty or nolo contendere or no contest, or having been sentenced to probation, a suspended sentence, or a fine.

Drafting note: States should not consider for written consent a person who has successfully completed deferred adjudication and has not been convicted of a qualifying felony. States may include in the definition of "Conviction" a plea in abeyance, a diversion, a sealed, or an expunged conviction.

- D. Dishonesty: To directly or indirectly cheat or defraud; to cheat or defraud for monetary gain or its equivalent; or to wrongfully take property belonging to another in violation of any criminal statute. Dishonesty includes acts involving lack of integrity, lack of probity, or a disposition to distort, cheat, or act deceitfully or fraudulently, and may include crimes which federal, state, or local laws define as dishonest. Common definitions for dishonesty include: lie, cheat, deceive, defraud; untrustworthiness; lack of integrity, honesty, fairness, etc.
- E. Felony: An offense that is specifically classified as such in [insert appropriate reference to state law]. If there is no classification, an offense is a felony if the maximum term of imprisonment authorized is more than one year, or if the maximum penalty is death.

Drafting note: The definition of "felony" varies according to state law.

Drafting note: Attachment C of the NAIC *Guidelines for State Insurance Regulators to the Violent Crime Control and Law Enforcement Act of 1994* provides guidance for evaluating which felonies involve "Dishonesty or Breach of Trust."

**4. Applying for Written Consent (This section is not applicable in jurisdictions that incorporate the 1033 written consent process into the producer licensing process and do not require a separate Application for Written Consent.)**

- A. Each prohibited person seeking written consent must submit a completed Application for Written Consent to Engage in the Business of Insurance ("Application") addressed to [Insert Individual Name to Review Request]. An Application shall be electronically submitted to [Insert Jurisdiction Email Address].
- B. A prohibited person has the responsibility to read the Application in its entirety and answer every question completely and accurately. Failure to complete the Application or submit any requested documentation may result in the denial [or dismissal] of the Application. An amendment to the Application must be filed upon the occurrence of any event, discovery, or recollection of any fact that would change any answer on the Application, and a copy of that amendment must be sent to other states where written consent was granted.

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Failure to file a timely amendment may result in the denial of written consent or withdrawal of previously granted written consent.

## **5. Process For Granting or Denying an Application**

- A. Each jurisdiction will establish a process for the receipt and review of an Application. This may include incorporating the 1033 written consent process into the process a jurisdiction uses to issue an insurance license.
- B. Notification of 1033 waiver application availability should be clearly presented prior to or during the licensing application process.
- C. A jurisdiction's process for review of a 1033 waiver application should be provided to an applicant at the time of submission.
- D. A jurisdiction should submit its final decision to grant or deny a 1033 waiver to the NAIC's 1033 State Decision Repository.

## **6. Standard by Which an Application Is Evaluated**

- A. An Application provides a prohibited person with the opportunity to demonstrate that, notwithstanding the conviction(s), they are trustworthy to engage or participate in the business of insurance. A prohibited person has the burden of satisfying this standard. Factors that may be considered by the Commissioner may be determined by each jurisdiction's rules, and may include, but are not limited to, the following:
  - i. The nature and severity of the offense and sentence.
  - ii. The date of conviction(s).
  - iii. The age at the time of committing the crime(s).
  - iv. The nature and extent of injury and/or loss caused by the act for which the prohibited person was convicted.
  - v. Unpaid judgment(s).
  - vi. Whether the crime was related to the business of insurance or the exercise of any professional or other license or authority conferred by a federal, state, or local governmental agency.
  - vii. Whether the prohibited person received an expungement or pardon from the sovereign that convicted him or her, and the reason for it.
  - viii. Whether the prohibited person successfully completed parole or probation without incident and all court requirements, including, but not limited to, completion of community service, court-ordered treatment, payment of all fines, penalties, or other assessments.
  - ix. Any aggravating or mitigating factors.
  - x. Whether other jurisdictions have granted or denied an 18 U.S.C. § 1033 written consent.
  - xi. The nature and strength of any letters of recommendation and other evidence of rehabilitation.
  - xii. The prohibited person's employment history before and after the commission of the crime(s).
  - xiii. the nature of any consumer complaints in the Department's possession or reported by the prohibited person.
  - xiv. Whether and to what extent the prohibited person has made materially false statements in any license application or in any other documents filed with the Department.
  - xv. The prohibited person's proposed type of employment in the insurance industry.
  - xvi. The extent to which the prohibited person will be supervised in that employment.
  - xvii. Whether and to what extent the prohibited person has made materially false statements in any application or in other documents filed with any other state or federal agency.
  - xviii. Whether the prohibited person has had any professional license revoked or suspended by any state or federal agency.

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- xix. Whether the prohibited person's civil rights have been restored.
- xx. Whether the prohibited person has a pattern of unlawful activity.
- xxi. The extent to which an insurance license offers opportunity to engage in further criminal activity.
- xxii. The level of cooperativeness of the prohibited person during the application process.

## **7. Conditions of Written Consent**

- A. An Application granted by the Commissioner is conditioned on the truth of the documents and information submitted by or on behalf of the prohibited person. If a prohibited person has made materially false or misleading statements, has presented materially false or misleading information, or has failed to disclose material information, that may constitute a separate violation of law.
- B. A person whose Application is granted has the Commissioner's written consent to engage in the business of insurance according to the terms and conditions of the written consent.



*Adopted by the Producer Licensing (D) Task Force, Aug. 12, 2025*

**SHORT FORM APPLICATION  
FOR WRITTEN CONSENT TO ENGAGE IN THE BUSINESS OF INSURANCE  
PURSUANT TO 18 U.S.C. §§ 1033**

**Notice to Applicant: 18 U.S.C. § 1033 prohibits certain activities by or affecting persons engaged, or proposing to become engaged, in the business of insurance:**

- (e)(1)(A) Any individual who has been convicted of any criminal felony involving dishonesty or a breach of trust, or who has been convicted of an offense under this section, and who willfully engages in the business of insurance whose activities affect interstate commerce or participates in such business, shall be fined as provided in this title or imprisoned not more than five (5) years, or both.**
- (B) Any individual who is engaged in the business of insurance whose activities affect interstate commerce and who willfully permits the participation described in subparagraph (A) shall be fined as provided in this title or imprisoned not more than five (5) years, or both.**
- (e)(2) A person described in paragraph (1)(A) may engage in the business of insurance or participate in such business if such person has the written consent of any regulatory official authorized to regulate the insurer, which written consent specifically refers to this section.**

**This Application will be reviewed by the chief insurance regulatory official in this state to determine whether the Applicant should be given written consent to engage in the business of insurance or participate in the business pursuant to 18 U.S.C. § 1033(e)(2).**

**You must answer every question on the Application. If a question does not apply, indicate N/A in the space provided for the answer. Your answers are not limited to the space provided on the Application. Attach additional pages as needed. The Department of Insurance will not process incomplete Applications. Additional information may be requested.**

**PLEASE TYPE****SECTION I - APPLICANT INFORMATION**

Full Name of Applicant:

<b>Last Name</b>	<b>First Name</b>	<b>Middle Name</b>

Have you ever been known by or used another name, including a maiden name? ☐ Yes ☐

No

If yes, identify: \_\_\_\_\_

Home Address: \_\_\_\_\_

<b>Street Address</b>	<b>City</b>	<b>State</b>	<b>ZIP</b>

Mailing Address:

<b>P.O. Box or Street Address</b>	<b>City</b>	<b>State</b>	<b>ZIP</b>

Personal Email Address: \_\_\_\_\_

Home Telephone Number: \_\_\_\_\_ Work Telephone Number: \_\_\_\_\_

Social Security No. \_\_\_\_\_

Have you ever used or been issued another Social Security number? \_\_\_\_\_

If so, provide an explanation and previous/other Social Security number(s)

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Place and Date of Birth:

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*(Answer all questions fully and completely. Failure to answer the questions fully will result in delays in the application process. You are not limited to the space below. Attach additional pages if needed.)***SECTION II - CRIMINAL HISTORY**

1. List any felony(s) for which you have been convicted. Include details of any negotiated plea agreements and pleas of nolo contendere to an Information or Indictment.

Provide a full description of your acts involved in these matters. Include the following:

- A. Dates of charge
- B. Location
- C. Nature of offense
- D. Detailed written statement explaining the circumstances of each incident
- E. Sentence
- F. Dates of incarceration

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- G. Dates of probation/parole (if you are currently under probation/parole, include the name and phone number of the person supervising your parole or probation)
- H. Restitution ordered/paid
- I. Fines/costs ordered/paid
- J. Pardons granted
- K. Information as to whether your civil and political rights have been restored.

Attach additional pages if needed.

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2. Have you ever applied for written consent from an insurance regulatory authority? ☐ Yes ☐ No  
If yes, provide details below:

State(s): \_\_\_\_\_

- ☐ Granted  
☐ Denied  
☐ Other \_\_\_\_\_

Please provide details of the outcome of prior or pending applications for written consent:

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### SECTION III - PRESENT/PROPOSED INSURANCE EMPLOYMENT

1. Please specify the name and address of your current or proposed employer to which the requested written consent will apply.

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2. Please describe in detail the office, position, and title to which the requested written consent will apply, and provide a complete description of the activities, duties, and responsibilities. Please attach or describe any proposed or current written or oral agreements, contracts, or understandings with any entity engaged in the business of insurance as defined by 18 U.S.C. § 1033. (If written consent is given, it will be applicable to the activities described herein.) Please include your date of employment or proposed date of employment.

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Adopted by the Producer Licensing (D) Task Force, Aug. 12, 2025

**SECTION IV - ATTACHMENTS**

Attach the following documents to this Application for written consent. Applications without attachments and applications with incomplete attachments will be returned to the applicant.

1. **Certified copy of the applicant's criminal history.**
2. **Certified copy of the indictment, criminal complaint, docket sheet, or other initiating documents for the charge(s) that is the subject of this Application.**
3. **Certified copy of the order of judgment and sentence of the court for the conviction(s) that is the subject of this Application, including certification of completion and performance of all conditions imposed by the court.**
4. **If applicable, an affidavit or written statement from the individual that seeks to employ you stating in detail the duties and responsibilities that you are performing or are to perform for them and for which you seek written consent and that it is that individual's opinion that the performance of these responsibilities does not constitute a threat to the public.**
5. **If applicable, letters of recommendation.**
6. **If applicable, a letter from the applicant's employer or prospective employer indicating they are aware of the felony conviction.**

**Drafting note:** Some jurisdictions may not require certified copies of documents.

I, \_\_\_\_\_ (name of applicant), swear under penalty of law that my statements in the attached Application, and the documents appended thereto, are true and correct and complete. I understand that my statements in the Application and the attachments to my Application will be relied upon by the Insurance Commissioner, Director, or Superintendent of Insurance, or other appropriate party, in the jurisdiction for which this application is made in the execution of his or her duties under the Insurance Code, and 18 U.S.C. § 1033, in making a decision on this Application. I understand that if I have made any false statement in this Application, or if there are any false statements included in the attachments to this Application, I may be criminally prosecuted under any state criminal or administrative remedies available and that any insurance license(s) that I currently hold, or for which I have applied, will be subject to suspension or revocation. I further understand that these false statement(s) would also constitute a violation of 18 U.S.C. § 1033. For purposes of this Application, I do not contest the validity of any felony conviction upon which this request would be granted. *By signing this Application, I grant permission to the Commissioner, Director or Superintendent of Insurance, or other appropriate party in the jurisdiction for which this application is made to verify information with any federal, state or local government agency, current or former employer, or insurance company, to request records of former employment, state and federal tax returns, business records, and banking records to confirm the information in this Application and I expressly consent and authorize any person, business or agency to release any information the Insurance Department may request as part of the investigation, including but not limited to, records of my former employment, state and federal tax returns, business records, and banking records.*

**Signature of Applicant:** \_\_\_\_\_ **Date:** \_\_\_\_\_

*Drafting note: Some jurisdictions may require applications to be notarized.*

**STATE OF** \_\_\_\_\_

**COUNTY OF** \_\_\_\_\_

**Subscribed, sworn to, and acknowledged before me by** \_\_\_\_\_ **to be his/her free act**  
**and deed this** \_\_\_\_ **day of** \_\_\_\_\_, **20** \_\_\_\_.

\_\_\_\_\_  
**Notary Public    State at Large    My Commission Expires:**

Draft: 8/15/25

Adjuster Licensing (D) Working Group  
Virtual Meeting  
August 8, 2025

The Adjuster Licensing (D) Working Group of the Producer Licensing (D) Task Force met Aug. 8, 2025. The following Working Group members participated: Rachel Chester, Chair (RI); Lorie Gasior, Vice Chair (LA); Charlene Ferguson, (CA); Lee Ellen Webb (KY); Jill Huisken (MI); Angela Hatchell (NC); Vanessa DeJesus (NM); Courtney Khodabakhsh (OK); Michael Fissel (PA); Randy Overstreet (UT); and Lisa Hastings (WI). Also participating was: Melanie Frechette (GA).

1. Discussed Chapter 18—Adjuster of the State Licensing Handbook

Chester reviewed the current revisions on Chapter 18—Adjuster of the *State Licensing Handbook*. She said Virginia provided additional suggested revisions to the chapter. Chester said those suggestions have not been added to the draft but will be added and resubmitted for review. The Working Group will continue to accept comments on the current draft. Chester said that if there are any new comments submitted, she would review them and bring them to the Working Group to discuss. She and Gasior will review the chapter to clearly identify public adjuster and independent adjuster licensing and clarify language applicable to company adjuster licensing.

2. Discussed Adjuster Licensing Uniformity

Chester said the Working Group had considered the development of an NAIC Adjuster Licensing Model Law but decided to continue discussing the development of regulatory best practices. In addition, the Working Group will discuss what information can be standardized for designated home state (DHS). Chester said the goal will be to review the regulator's best practices for DHS and develop a definition of DHS. The DHS topic has caused a lot of issues within states, and it has morphed in the past 15 to 20 years. Chester said the Working Group will be reviewing other issues, such as individuals having the same business address and residential address.

Chester asked regulators to run a query in their own licensing database to see how many non-resident DHS holders have a DHS when they should not.

The Working Group discussed public, staff, and independent adjuster licensing. Chester said the goal of its discussions will be to establish efficient and effective licensing with reliable and verifiable information.

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

SharePoint/NAIC Support Staff Hub/Committees/D CMTE/2025 Summer/PLTF/Adjuster Licensing WG/Minutes/ALWG Minutes 8.8.25

Draft: 8/15/24

Adjuster Licensing (D) Working Group  
Virtual Meeting  
July 10, 2025

The Adjuster Licensing (D) Working Group of the Producer Licensing (D) Task Force met July 10, 2025. The following Working Group members participated: Rachel Chester, Chair (RI); Lorie Gasior, Vice Chair (LA); Peggy Dunlap (AR); Charlene Ferguson (CA); Vanessa DeJesus (NM); Courtney Khodabakhsh (OK); Randy Overstreet (UT); and Jeff Baughman (WA). Also participating were: Vanessa C. Miller (MS); and Lindsey Jones (OH).

1. Discussed Iowa Adjuster Licensing Requirements

Chester said Iowa has recently implemented licensing requirements for adjusters. She said Iowa has made great efforts and is the first new state to implement these adjuster licensing requirements. The Working Group discussed the reciprocity and licensing requirements for Iowa residents. The discussions emphasized the collaboration among states to ensure uniformity in adjuster licensing practices. Chester said states have expressed the importance of requiring staff adjuster licenses where applicable.

2. Discussed Chapter 18—Adjuster of the *State Licensing Handbook*

Chester said the revised draft of Chapter 18—Adjuster has been distributed and is available on the Working Group web page. Draft revisions are open for comment. She said the Working Group will meet in future monthly meetings to finalize the review.

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

SharePoint/NAIC Support Staff/Committees/D CMTE/2025 Summer/PLTF/Adjuster Licensing WG/Minutes/ALWG Minutes 7.10.25

Draft: 8/15/25

Adjuster Licensing (D) Working Group  
Virtual Meeting  
April 2, 2025

The Adjuster Licensing (D) Working Group of the Producer Licensing (D) Task Force met April 2, 2025. The following Working Group members participated: Rachel Chester, Chair (RI); Lorie Gasior, Vice Chair (LA); Peggy Dunlap (AR); Charlene Ferguson (CA); Vanessa DeJesus (NM); Courtney Khodabakhsh (OK); Randy Overstreet (UT); and Jeff Baughman (WA). Also participating were: Vanessa C. Miller (MS); and Lindsey Jones (OH).

1. Discussed its Priorities for 2025

Chester stated that the Working Group will review the 2024 adjuster licensing survey results to ensure consistency in information. The Working Group will also discuss designated home state best practices, review and update the adjuster licensing standards, review the NAIC Adjuster Uniform Application to ensure accuracy, and finalize the review of Chapter 18—Adjuster of the *State Licensing Handbook*.

2. Discussed Chapter 18—Adjuster of the *State Licensing Handbook*

Chester said the revised draft of Chapter 18—Adjuster has been distributed and can be found on the Working Group's web page. She said the Working Group will be accepting comments on the current draft. Chester said she would review the comments received and apply them to the chapter. The Working Group will meet monthly to finalize the review and present the final revisions to the Producer Licensing Uniformity (D) Working Group.

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

SharePoint/Support Staff Hub/Committees/D CMTE/2025 Summer/PLTF/Adjuster Licensing WG/Minutes/ALWG Minutes 4.2.25

Draft: 8/25/25

Producer Licensing Uniformity (D) Working Group  
Virtual Meeting  
August 5, 2025

The Producer Licensing Uniformity (D) Working Group of the Producer Licensing (D) Task Force met Aug. 5, 2025. The following Working Group members participated: Courtney Khodabakhsh, Chair (OK); Monicka Richmeier, Vice Chair (KS); Kayla Erickson (AK); Charlene Ferguson (CA); Matt Tamplin (FL); Lori Thomason (ID); Lorelei Brillante (MD); Jill Huiskens (MI); Janelle Middlestead (ND); Lindsey Jones (OH); Rachel Chester (RI); Sue Yerges (SD); Randy Overstreet (UT); Tony Clayton (VA); Jeff Baughman (WA); Melody Esquivel (WI); and Lisa Hastings (WY). Also participating were: Lori Gasior (LA); Tracy Cunningham (ME); Vanessa Miller (MS); and Elizabeth Parsons (NC).

1. Discussed its Review of the *State Licensing Handbook*

Khodabakhsh said that during its July meeting, the Working Group discussed the comments received from North Dakota and Rhode Island concerning Chapter 9—Lines of Insurance.

Tina Wirtz (IMA Financial) said she submitted new suggestions regarding pet insurance. She said some states classify pet insurance under property/casualty (P/C), while some states classify pet insurance as health insurance. Wirtz said greater uniformity is needed. Wirtz said greater licensing uniformity is also needed for travel insurance. Chester said the NAIC *Pet Insurance Model Act* (#663) defines pet insurance as a property insurance policy that provides coverage for accidents and illnesses of pets. Khodabakhsh said neither pet nor travel insurance is considered a major line of authority, but some language may be used to provide further clarity.

The Working Group then discussed suggested edits to Chapter 10—Surplus Lines. Elizabeth Goodwin (Council of Insurance Agents & Brokers—CIAB) said there needs to be more uniformity regarding the licensing requirement for a surplus lines license. She said the suggested edits of CIAB emphasize adherence to the NAIC *Nonadmitted Insurance Model Act* (#870). Goodwin said CIBA also suggested two best practices for insurance regulators to consider eliminating the filing of zero reports for surplus lines. Goodwin said the last comment of CIAB is a suggestion to consider streamlining diligent search requirements by providing certain exemptions, such as the use of state export lists, automatic surplus lines, market access for deregulated commercial risks, and streamlined access when a retail producer reasonably determines no admitted market exists. Keri Kish (Wholesale & Specialty Insurance Association—WSIA) said the WSIA worked with the CIAB on their written comments and agreed with the suggestions.

Ferguson said the Chapter 10 section addressed by Goodwin says that under Model #870 and the Uniform Licensing Standards (ULS), the surplus line license is a separate and distinct licensure and suggests changing that word to license. Ferguson said most of her suggestions are minor edits, such as changing references from retail producer to the producer and the designated stamping office.

Wirtz said Chapter 10 states that companies are required to be eligible in a state; however, they are regulated differently. She said the broker has to vet the insurance company, and the state does not have an approved list; therefore, there is no official approval for them to be eligible to write. Wirtz suggested the Working Group review for possible revisions.

Kish said Model #870 sets the standards, and there is an eligibility requirement per state. She said that the insurer must be eligible in a state where the business is exported, and any approved list or listing according to Model #870 should be voluntary. Kish said some states have mandatory listings, which are viewed as a federal standard.



Khodabakhsh said that to support the review of this chapter, she would ask for any comments to be submitted in writing so the Working Group can review the language. The Working Group continued to discuss the surplus lines process and agreed to continue this discussion on the next conference call.

Khodabakhsh said the Working Group received comments from North Carolina, North Dakota, Virginia, and the CIAB on Chapter 11—Appointments.

Parsons said North Carolina has been receiving a lot of questions from carriers about whether the state accepts electronic notices for terminations for cause or terminations not for cause. She suggested greater clarity on this issue be included in Chapter 11.

Khodabakhsh said North Dakota suggests that states do not issue personal lines for a resident if they already hold property line of authority and casualty line of authority. She said that for non-residents, only a personal line will be issued if the producer holds the personal lines of authority in their resident's state. Khodabakhsh said that, per North Dakota's suggestion, this applies to both individuals and business entities. Khodabakhsh said North Dakota also suggests moving personal lines to limited line and not considered a major line of authority.

Tozer said Virginia submitted suggestions on this chapter, beginning with the first paragraph. He said the last sentence addresses the federal National Association of Registered Agents and Brokers Reform Act (NARAB) and would suggest that language be added to clarify that NARAB has not been formed. Tozer said Virginia made editing suggestions throughout the chapter, which can be viewed in the comments submitted. He said the next significant suggestion is that the electronic filing of appointments and appointment terminations should be processed through the National Insurance Producer Registry (NIPR). Laurie Wolf (NIPR) said all states used the services of NIPR for their appointments and terminations.

Tozer suggested referencing the *Producer Licensing Model Act* (#218) which sets forth a 15-day appointment rule. He said Virginia and some other states have a 30-day appointment rule. Tozer said the next suggestion concerns just-in-time appointments. He said that several years ago, there was a discussion regarding just-in-time appointments, prescribing timelines for filing appointments. He said this may be a good opportunity to expand or add a separate section. The Working Group discussed the history behind just-in-time appointments and agreed to review this section for any necessary revisions.

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

SharePoint/Support Staff Hub/Committees/D CMTE/2025 Summer/PLTF/Working Group Minutes /PLUWG Minutes 8.5.25

Draft: 8/22/25

Producer Licensing Uniformity (D) Working Group  
Virtual Meeting  
July 15, 2025

The Producer Licensing Uniformity (D) Working Group of the Producer Licensing (D) Task Force met July 15, 2025. The following Working Group members participated: Courtney Khodabakhsh, Chair (OK); Monicka Richmeier, Vice Chair (KS); Genoa Mangusso and Kayla Erickson (AK); Charlene Ferguson (CA); Matt Tamplin (FL); Lori Thomason, Kristen Talford, and Margene Benedetti (ID); Lorelei Brillante (MD); Jill Huiskens (MI); Janelle Middlestead (ND); Lillian Baros (NM); Alana Neff, Bill Carter, and Lindsey Jones (OH); Rachel Chester (RI); Sue Yerges and Tony Dorschner (SD); Randy Overstreet (UT); Tony Clayton (VA); Jeff Baughman (WA); Melody Esquivel (WI); and Lisa Hastings (WY). Also participating were: Lori Gasior (LA); Dawn Kilgore, Melissa Williams, and Tracy Cunningham (ME); and Vanessa Miller (MS).

1. Discussed the Review of the *State Licensing Handbook*

Khodabakhsh said that following the Working Group's June 17 meeting, a request was sent for comments on Chapter 9—Lines of Insurance, Chapter 10—Surplus Lines, and Chapter 11—Appointments of the *State Licensing Handbook*. Khodabakhsh said it is important for the Working Group to maintain the standards established through the NAIUC *Producer Licensing Model Act* (#218) and NAIC Uniform Licensing Standards (ULS).

Tina Wirtz (IMA Financial Group) said there have been challenges with producers moving changing state of residency. She said this causes issues with producers being unlicensed for a period of time and suggested a 30-day grace period for producer to still write business while the residence license is changed. Wirtz said another suggestion is in regard to all states having a producer license. Khodabakhsh asked if this is regarding all states providing producer licenses or is this concerning surplus lines brokers. Wirtz provided an example of New York, which has a P&C broker license, P&C agent license, life health agent license, and life health broker license. Wirtz said it would be easier if a state issued one type of license which by line of authority.

Wes Bisset (Independent Insurance Agent and Brokers of America Big—IIABA) said he shares the concerns regarding producers changing resident states. Bisset said the Working Group should review business entity licensing standards. The Working Group agreed to have more discussions as the *State Licensing Handbook* chapters were reviewed.

Kate Jensen (Steptoe) said Steptoe represents the Council of Insurance Agents and Brokers—CIAB) said the CIAB supports the industry comments made. She said the comments CIAB submitted address some of these concerns. John Meetz (Wholesale & Specialty Insurance Association—WSIA) said WSIA worked with CIAB on a comment letter addressing similar concerns shared by other industry participants.

Khodabakhsh said the Working Group received two sets of comments on Chapter 9—Lines of Insurance from North Dakota and Rhode Island. Middlestead said North Dakota's comments were primarily for purposes of clarity and uniformity. She cited the language in this chapter stating, "If a state cannot verify through State Producer Licensing Database (SPLD) that the applicant holds a variable authority, it is permissible to pend the application and contact the applicant's home state to verify the variable authority." She said if the SPLD shows that an applicant holds a variable authority, some states will pend the application while other states will not. Middlestead said North Dakota's suggestion is to put the license in a pending status and allow seven days for review. She said North Dakota will approve the other lines of authority requested while further review is conducted for the variable line of authority. Middlestead suggested that states should be required to verify an applicant for a variable line of

authority holds the appropriate securities license. Khodabakhsh requested that Middlestead submit suggested language for consideration.

Chester said Rhode Island's suggestion concerns the Financial Industry Regulatory Authority's (FINRA's) BrokerCheck section of the chapter. Chester said the link currently listed in the handbook is incorrect and should be updated.

Khodabakhsh said these were good suggestions and discussion on Chapter 9. She said she would work with NAIC staff to update chapter with suggested revisions for further review by the Working Group.

Regarding Chapter 10—Surplus Lines, Khodabakhsh said the Working Group received comments from the CIAB, WISA, California, Washington, and the Securities and Insurance Licensing Association (SILA).

Ferguson said the first suggestion is to change the term producer to a person or business entity regarding the ULS section. She said the next suggest concerns the Nonadmitted and Reinsurance Reform Act (NRRA) and removing the reference President Barack Obama. Ferguson said this section of the chapter has language that does not apply to surplus lines licensing and suggested this language be deleted. She said the last suggested revision is adding additional administrative requirements and best practices for insurance regulators. The Working Group discussed and agreed to the suggested changes.

Jensen said the CIAB agrees with the comments submitted by California, Washington, and SILA. Jensen said Model #218 addresses the activities of retail producers, which requires an individual to have a producer license to sell, solicit, or negotiate insurance. Jensen said the NAIC's *Non-Admitted Insurance Model Act* (#870) addresses the licensing trigger for surplus lines licenses, using the word "procure" with a surplus lines insurer. She said states have different approaches to the surplus lines license requirement, and some states are applying the licensing requirement for retail producers to surplus lines brokers. Jensen said there is an opportunity for increased uniformity in surplus lines licensing by focusing on distinct licensure categories for retail producers and surplus lines brokers.

Meetz said he agrees with the written comments from California, Washington, and SILA. Meetz said the Working Group should review the requirement for the filing of a zero premium report in 25 states.

Khodabakhsh said the suggestions and feedback be reviewed and a revised chapter will be circulated for comment.

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

SharePoint/Support Staff Hub/Committees/D CMTE/2025 Summer/PLTF/Working Group Minutes /PLUWG Minutes 7.15.25

Draft: 8/16/25

Producer Licensing Uniformity (D) Working Group  
Virtual Meeting  
June 17, 2025

The Producer Licensing Uniformity (D) Working Group of the Producer Licensing (D) Task Force met June 17, 2025. The following Working Group members participated: Courtney Khodabakhsh, Chair (OK); Monicka Richmeier, Vice Chair (KS); Peggy Dunlap (AR); Charlene Ferguson (CA); Lori Thomason (ID); Lorelei Brillante (MD); Jill Huisken (MI); Janelle Middlestead (ND); Tynesia Dorsey (OH); Tony Dorschner (SD); Randy Overstreet (UT); Richard Tozer (VA); Jeff Baughman (WA); and Lisa Hastings (WY). Also participating were: Lorie Gasior (LA); and Vanessa Miller (MS).

1. Discussed NIPR Commissioner Dashboards

Khodabakhsh said the Working Group asked the National Insurance Producer Registry (NIPR) to provide an overview and additional explanation of the NIPR commissioner dashboards.

Cari Lee (NIPR) said NIPR continued its efforts to improve uniformity and reciprocity in 2016 by creating dashboards based on regulator feedback. She said NIPR started sending these dashboards to all the commissioners and the licensing directors. Lee said that NIPR updates states adherence to dashboards approximately every six months.

Lee said the dashboards will show green checks and red "X" marks to indicate compliance/noncompliance. She said that when a state has all green checkmarks, it is in full compliance. She said that when reviewing the dashboard for a state, the first portion shows the overview of NIPR electronic licensing products and services that a state currently uses. This portion includes the use of new resident licenses and renewals, new non-resident licenses and renewals, the Attachment Warehouse, contact change requests, appointments and terminations, appointment renewals, adjuster-designated home states, demographic updates (primary name), license updates, and other class types and lines of authority. Lee said the dashboards serve as a tool to show the positive work each state is completing.

Lee said the next section of the dashboard includes the key indicators that each state can use to assess their processes. She said examples may include state adoption of the following: 1) the major lines of authority (LOA), as outlined in the *Producer Licensing Model Act* (#218); 2) only the core limited lines set forth in the NAIC Uniform Licensing Standards (ULS) - car rental, credit, crop, and travel; 3) biennial, end-of-birth-month license renewal cycle; and 4) licensing fees.

The Working Group discussed the correlation between these dashboards and the NAIC ULS self-reporting checklist. Khodabakhsh said that in discussions with the Working Group, many states have questions about using this dashboard to complete the ULS chart. Lee said NIPR recognizes states face challenges updating terminology and aligning licensing practices across jurisdictions. She said NIPR will review the states' needs to potentially broaden the dashboard metrics to include items such as fingerprinting and continuing education (CE). The Working Group agreed and discussed evolving the dashboard to address more substantive licensing standards in the future.

Khodabakhsh said that any state that has not submitted its revised NAIC ULS checklist should review the NIPR commissioner dashboards with the submissions of compliance with the NAIC ULS. Khodabakhsh said these ULS charts, and the dashboards will be utilized for the Working Group's review of the *State Licensing Handbook* chapters. She said that based on the Working Group's discussions, there is a need review the appointments section

of the *State Licensing Handbook*. Tozer said he would coordinate with Khodabakhsh prior to the next conference call to work on some revisions.

Khodabakhsh reminded the Working Group to review Chapter 9—Lines of Insurance and Chapter 10—Surplus Lines in preparation for the Working Group’s July meeting. She said that California and Washington are currently working on the best practices for surplus lines licensing revisions.

## 2. Discussed Other Matters

Tozer said the Uniform Education (D) Working Group will meet June 18 to continue work on the *State Licensing Handbook* chapters it has been assigned.

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

SharePoint/Support Staff Hub/Committees/D CMTE/2025 Summer/PLTF/Working Group Minutes /PLUWG Minutes 6.17.25

Draft: 8/25/25

Producer Licensing Uniformity (D) Working Group  
Virtual Meeting  
May 20, 2025

The Producer Licensing Uniformity (D) Working Group of the Producer Licensing (D) Task Force met May 20, 2025. The following Working Group members participated: Courtney Khodabakhsh, Chair (OK); Monicka Richmeier, Vice Chair (KS); Peggy Dunlap (AR); Charlene Ferguson (CA); Lori Thomason (ID); Lorelei Brillante (MD); Jill Huisken (MI); Janelle Middlestead (ND); Tynesia Dorsey (OH); Tony Dorschner (SD); Randy Overstreet (UT); Richard Tozer (VA); Jeff Baughman (WA); and Lisa Hastings (WY). Also participating was: Vanessa Miller (MS).

1. Discussed the NAIC Uniform Licensing Standards

Khodabakhsh said a request was sent to states to update the self-reporting of compliance with the Uniform Licensing Standards (ULS). She said the update was last completed in 2017. Khodabakhsh said that the Working Group has received 25 state responses and will be reaching out to collect the remaining state responses. She said the Working Group will compare the new charts to the 2017 results to identify low compliance areas and areas where the Working Group can assist states in achieving uniformity. Khodabakhsh gave the example of the current results reflecting that core limited lines compliance is at 75%, which is one of the lower areas needing improvement. The Working Group discussed the need for stronger commission-sharing and continuing education (CE) requirements. Khodabakhsh said that in future meetings she will prioritize the discussions around standards addressing limited lines and commissions.

2. Discussed the Review of the *State Licensing Handbook*

Khodabakhsh said that at the end of 2024, the Working Group began reviewing the *State Licensing Handbook*. She said that to begin this process, a checklist with each chapter was distributed to all states to solicit feedback on chapters in need of revision. The checklist also provided an opportunity to give specific details for each chapter. The Working Group discussed focusing on compliance rates with regard to fingerprinting and background checks.

Khodabakhsh said the compiled responses showed that 15 chapters would need to be reviewed: Chapter 1—Modern Producer Licensing; Chapter 6—Prelicensing Education; Chapter 7—Application Review for Initial Licenses; Chapter 8—Testing Programs; Chapter 9—Lines of Insurance; Chapter 10—Surplus Lines Producer Licenses; Chapter 11—Appointments; Chapter 12—Business Entity; Chapter 13—Temporary Licenses; Chapter 14—Continuing Education; Chapter 18—Adjuster; Chapter 19—Bail Bonds Agent; Chapter 24—Managing General Agents; Chapter 25—Multiple Employer Welfare Arrangements; and Chapter 30—Viatical and Life Settlement Brokers.

Khodabakhsh said Chapter 1 will be reviewed by the National Insurance Producer Registry (NIPR); Chapters 6, 8, and 14 will be reviewed by the Uniform Education (D) Working Group; and Chapter 18 will be reviewed by the Adjuster Licensing (D) Working Group. She said this Working Group will review the remaining chapters (Chapters 7, 9, 10–13, 19, 24–25, and 30).

Khodabakhsh said the Working Group's goal is to review each chapter and adopt them all at once to ensure proper coordination.

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

SharePoint/Support Staff Hub/Committees/D CMTE/2025 Summer/PLTF/Working Group Minutes /PLUWG Minutes 5.20.25

Draft: 8/20/25

Uniform Education (D) Working Group  
Virtual Meeting  
August 9, 2025

The Uniform Education (D) Working Group of the Producer Licensing (D) Task Force met Aug. 9, 2025. The following Working Group members participated: Richard Tozer, Chair (VA); Lorelei Brillante, Vice Chair (MD); Peggy Dunlap (AR); Charlene Ferguson (CA); Vanessa C. Miller (MS); Victoria Baca (NM); Lindsey Jones (OH); Courtney Khodabakhsh (OK); Rachel Chester (RI); Jodie Delgado (TX); and Jeff Baughman (WA).

1. Discussed the Review of the *State Licensing Handbook*

Tozer said that during its previous meetings, the Working Group reviewed the following chapters of the *State Licensing Handbook*: Chapter 6—Prelicensing Education, Chapter 8—Testing Programs, and Chapter 14—Continuing Education. He said the Working Group has finalized its review of Chapter 6.

Tozer said the Working Group reviewed Chapter 8 and addressed the areas that will need further review and input from states. Tozer said throughout the chapter, the Working Group highlighted areas that could use clarifying language, including Testing Development and Review, Exam Scoring, and Exam Content. The Working Group discussed the Candidate Information Bulletin and Test Administration section. States have varying rules regarding exam retakes, with limits and waiting periods differing significantly. Tozer said the goal of the Working Group is to revise the chapter with uniform language. The Working Group discussed, and states provided feedback on how their state language varies. The Working Group agreed to work with Tozer individually to provide supportive, clarifying language for the separate sections.

Tozer said the Reporting Examination Results section received suggestions to remove several of the elements listed including: 1) if a state issues a paper license, and if it has been predetermined that an applicant has met all requirements necessary for licensure, including any required fingerprint report, a license should be issued at the exam site, or within 48 hours of completing all necessary requirements; 2) the state should send an email or other timely communication to a candidate to whom a license has been issued outside the test site or provide information to applicants as to how to check online; 3) within 24 hours of license issuance, the new licensee's information should be added to the state's database, and the updated status should be sent to the National Insurance Producer Registry (NIPR); 4) in performing background checks, the use of an electronic process should be required whenever possible; and 5) in those states requiring fingerprints, where possible, exam sites should have the capability to collect electronic fingerprints. The Working Group discussed and agreed to the removal of these elements.

Tozer said the Working Group discussed adding remote exams to the best practices section of Chapter 8. The Working Group agreed that it would need to draft suggested revisions to address this issue.

Tozer said he would work with NAIC staff to revise Chapter 8 and provide draft language for review. Tozer said his goal is for the Working Group to finalize its review of Chapter 8 and then begin its review of Chapter 14.

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

SharePoint/Support Staff Hub/Committees/D CMTE/2025 Summer/PLTF/Working Group Minutes /UEWG Minutes 8.6.25



Draft: 8/20/25

Uniform Education (D) Working Group  
Virtual Meeting  
July 9, 2025

The Uniform Education (D) Working Group of the Producer Licensing (D) Task Force met July 9, 2025. The following Working Group members participated: Richard Tozer, Chair (VA); Lorelei Brilliante, Vice Chair (MD); Peggy Dunlap (AR); Charlene Ferguson (CA); Vanessa C. Miller (MS); Victoria Baca (NM); Lindsey Jones (OH); Courtney Khodabakhsh (OK); Rachel Chester (RI); Jodie Delgado (TX); and Jeff Baughman (WA). Also participating was: Tracy Cunningham (ME).

1. Discussed the Review of the *State Licensing Handbook*

Tozer said during its June 18 meeting, the Working Group provide a summary of its discussions regarding revisions to Chapter 6—Prelicensing Education of the *State Licensing Handbook* and began reviewing Chapter 8—Testing Programs. Tozer said the edits include updating the correct name of the Producer Licensing (D) Task Force and its Working Groups. He said as the Working Group continues to review Chapter 8 and Chapter 14—Continuing Education. Chapter 6 will remain open in case the Working Group determines another area needs revisions due to the ongoing discussions of the other chapters.

Tozer said the Working Group reviewed Chapter 8 during its June meeting, which included a discussion of the use of the term producer versus licensee and the correct date of the last revision to the Uniform Licensing Standards (ULS), and reviewed the reporting examination section to confirm the elimination of elements. T

Tozer said the Working Group received four sets of comments for Chapter 14. Tozer said the comments were from California, Maine, Virginia, and the Professional Insurance Agents (PIA).

Tozer said California's comments concerned language edits for clarity. The Working Group discussed and agreed to these changes.

Cunningham said Maine provided minor comments, including some technical edits. The Working Group discussed and agreed to incorporate the technical edits. Tozer said the Working Group would review the additional suggestions in more detail.

Tozer said the Working Group received a comment letter from PIA addressing Chapter 6, Chapter 8, and Chapter 14. The comments from PIA contained some language changes to enhance clarity and a discussion of the key elements within the Course Approval section.

The Working Group discussed the importance of ensuring exam questions meet readability standards for applicants, focused on candidate information bulletins, and the inclusion of remote testing. Tozer said he would work with NAIC staff to incorporate the suggested changes discussed today. Tozer said the Working Group will review the suggested updates to remote testing and language addressing time limits for retesting.

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

SharePoint/Support Staff Hub/Committees/D CMTE/2025 Summer/PLTF/Working Group Minutes /UEWG Minutes 7.9.25

Draft: 8/18/25

Uniform Education (D) Working Group  
Virtual Meeting  
June 18, 2025

The Uniform Education (D) Working Group of the Producer Licensing (D) Task Force met June 18, 2025. The following Working Group members participated: Richard Tozer, Chair (VA); Lorelei Brillante, Vice Chair (MD); Peggy Dunlap (AR); Charlene Ferguson (CA); Vanessa C. Miller (MS); Victoria Baca (NM); Lindsey Jones (OH); Courtney Khodabakhsh (OK); Rachel Chester (RI); Jodie Delgado (TX); and Jeff Baughman (WA).

1. Discussed the Review of the *State Licensing Handbook*

Tozer said during its May meeting, the Working Group discussed Chapter 6—Prelicensing Education of the *State Licensing Handbook* (Handbook) and agreed to revisions. He reviewed the revisions with the Working Group. Tozer said that as the group works through the remaining chapters, it will leave Chapter 6 open for potential changes but will consider this chapter completed.

The Working Group determined that throughout the Handbook, the use of Producer Licensing (EX) Task Force would be changed to reflect the Producer Licensing Uniformity (D) Working Group and Producer Licensing (D) Task Force, which are the appropriate groups that work on the Handbook. Where appropriate, a link will be added that will take the reader to an associated webpage, and language will be changed to provide clarity throughout the chapter. Tozer said once the group has completed its review of all three chapters, it will present them to the Producer Licensing Uniformity (D) Working Group for review and adoption.

Tozer said the Working Group will move on to Chapter 8—Testing Programs. Tozer said California's comments suggest deleting the last paragraph under “Examinations in Language Other Than English,” which is found on page 39.

Tozer said the next set of comments was from Maine. Cunningham said Maine suggested verifying whether the term “producers” or “licensees” is the uniform and appropriate term to use throughout the Handbook, confirming limited lines, and discussing the use of entry-level examinations. She raised concerns about exam pass rates and prelicensing education relevance. The Working Group discussed the terms “licensee” versus “producer.” The Working Group agreed to clarify language on examination processes and timelines.

Tozer said Oklahoma suggested verbiage to the “Examinations in Language Other Than English” section. The Working Group discussed this suggestion, and Tozer advised that they would review for an appropriate update to this section. The Working Group discussed and recognized that there were other states and associations with suggested revisions for this section.

Tozer said the next set of comments was received from the (American Council of Life Insurance—ACLI) concerning “Examinations in Languages Other Than English.” He said the group will review all the comments submitted on this section to provide revised language. Kirstin Wofford (ACLI) said the ACLI also provided comments throughout the chapter to improve clarity and conciseness. Wofford said ACLI noted a trend of offering producer exams in multiple languages and the challenges of translating exam materials into non-Spanish languages due to cultural biases. She suggested updating the Handbook to reflect this trend. The comments from the Professional Insurance Agents—PIA) focused on improving clarity and conciseness.

The Working Group discussed chapter 8 changes and agreed that NAIC staff would make the necessary language changes to ensure consistency in the terminology, remove or amend references to issuing licenses at test centers based on earlier discussions from the Working Group, verify the correct date the Uniform Licensing Standards (ULS) were last revised, and review the language describing the offering of exams in languages other than English.

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

SharePoint/Support Staff Hub/Committees/D CMTE/2025 Summer/PLTF/Working Group Minutes /UEWG Minutes 6.15.25

Draft: 8/6/25

Uniform Education (D) Working Group  
Virtual Meeting  
May 7, 2025

The Uniform Education (D) Working Group of the Producer Licensing (D) Task Force met May 7, 2025. The following Working Group members participated: Richard Tozer, Chair (VA); Lorelei Brillante, Vice Chair (MD); Peggy Dunlap (AR); Charlene Ferguson, Dawn Ward, and Dillon Gingras (CA); Vanessa C. Miller (MS); Vanessa DeJesus (NM); Lindsey Jones (OH); Courtney Khodabakhsh (OK); Rachel Chester (RI); and Jeff Baughman (WA).

1. Discussed the *State Licensing Handbook*

Tozer said the Producer Licensing Uniformity (D) Working Group asked the Uniform Education (D) Working Group to review Chapter 6—Prelicensing Education, Chapter 8—Testing Programs, and Chapter 14—Appointments of the *State Licensing Handbook*.

Tozer said a request for comments was distributed to regulators and industry. Tozer said the Working Group would focus on Chapter 6 during this call and then discuss Chapters 8 and 14.

Tozer said the use of “Producer Licensing (EX) Task Force” would be removed because that Task Force was disbanded. Tozer said appropriate references will be made to the Producer Licensing Uniformity (D) Working Group and Producer Licensing (D) Task Force. Tozer said that, where appropriate, links will be added throughout the *State Licensing Handbook* to allow individuals to visit associated web pages.

2. Discussed 2024 Pass Rates

Tozer said the Working Group has received all the state pass rates from vendors and individual states. He said the NAIC has updated the pass rates and posted them on its website. Tozer said the Working Group will begin working on the 2025 pass rates toward the end of this year for posting in early 2026.

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

SharePoint/Support Staff Hub/Committees/D CMTE/2025 Summer/PLTF/Working Group Minutes /UEWG Minutes 5.7.25