Draft: 11/13/26

Producer Licensing (D) Task Force
Virtual Meeting
November 5, 2026

The Producer Licensing (D) Task Force met Nov. 5, 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 Genoa Mangusso (AK); Mark Fowler represented by Antwionne Dunklin (AL); Charles Bassett represented by Steven Fromholtz (AZ); Ricardo Lara represented by Charlene Ferguson (CA); Michael Conway represented by Steven Giampaolo (CO); Trinidad Navarro represented by Robin Pyfer (DE); Ann Gillespie represented by Justin Hammersmith (IL); Sharon P. Clark (KY); Timothy J. Temple represented by Lorie Gasior (LA); Marie Grant represented by Shelley Taylor-Barnes (MD); Anita G. Fox represented by Michele Riddering (MI); Julia Dreier 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 and Kevin Schlautman (NE); Alice T. Kane represented by Vanessa DeJesus (NM); Ned Gaines represented by Jacob Roberts (NV); Judith L. French represented by Lindsey Jones (OH); TK Keen represented by John Haworth (OR); Michael Humphreys represented by Michael Fissel (PA); Elizabeth Kelleher Dwyer represented by Mariel Garcia (RI); Larry D. Deiter represented by Tony Dorschner (SD); Amanda Crawford represented by Jodie Delgado (TX); Patty Kuderer represented by Nicole Rayl (WA); Nathan Houdek represented by Melody Esquivel (WI); and Erin K. Hunter represented by Robert Grishaber and Brittany V. Moles (WV). Also participating was: Amy Stegall (CT).

1. Adopted its Oct. 8 Minutes

The Task Force met Oct. 8. During this meeting, the Task Force took the following action: 1) adopted its Summer National Meeting minutes (*see NAIC Proceedings – Summer 2026, Producer Licensing (D) Task Force*); 2) discussed proposed revisions to the *Independent Adjuster Licensing Guideline* (GL 1224); 3) discussed the 1033 written consent process, including the definition of "conviction"; 4) discussed the Company Notice of Termination for Cause Form; 5) received an update on the NAIC *State Licensing Handbook* revisions; and 6) discussed its 2027 proposed charges.

Haworth made a motion, seconded by Delgado, to adopt the Task Force's Oct. 8 minutes (Attachment One). The motion passed unanimously.

2. Adopted its 2027 Proposed Charges

Ferguson made a motion, seconded by Haworth, to adopt the Task Force's 2027 proposed charges (Attachment Two). The motion passed unanimously.

3. Adopted Revisions to the *Independent Adjuster Licensing Guideline* (GL 1224)

Tozer made a motion, seconded by Ferguson, to adopt the revisions to the *Independent Adjuster Licensing Guideline* (Attachment Three). The motion passed unanimously.

4. Adopted the Template for the 1033 Written Consent Process

Delgado made a motion, seconded by DeJesus, to adopt the template for the 1033 Written Consent Process (Attachment Four). The motion passed unanimously.

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5. Adopted Revisions to the NAIC *State Licensing Handbook*

Fromholtz made a motion, seconded by Pyfer, to adopt the revisions to the NAIC *State Licensing Handbook* (Attachment Five). The motion passed unanimously.

6. Discussed the Company Notice of Termination for Cause Form

Richmeier said the Company Notice of Termination for Cause Form would create a uniform form that companies submit electronically to all states. She said the states currently use several different forms and methods. Richmeier said the form is intended to make it efficient for companies to remain compliant, make it easier for states to receive information from companies, and help regulators protect consumers.

Richmeier said several parties recommended adding a text box to summarize the investigation. She said the ad hoc drafting group decided not to add the text box because the form is a public record in some states.

Richmeier said a regulator recommended revising the "producer name field" from the name as it appears with the National Insurance Producer Registry (NIPR) to the name as it appears in the Producer Database (PDB), which generally is the legal name on the producer's license. She said the ad hoc drafting group agreed with the change.

Richmeier said several comments addressed the language at the top of the form regarding appointment terminations. She said the form applies strictly to terminations for cause, and a separate electronic process exists for other appointment changes. Richmeier said companies use various resellers and business solution providers, and the form is not intended to change a company's current process or require use of a specific entity. Richmeier said Vertafore proposed language stating that other appointment changes may be processed electronically through the company's solution provider for appointment and termination submissions. Delgado recommended replacing "unless" with "or" so the language would refer to submission through NIPR or in a different format the state allows. Richmeier agreed that "or" was appropriate and proposed language stating that other appointment changes may be processed electronically through NIPR or the company's solution provider. Paula Sisneros (Vertafore) said she supported using "or" and asked that the reference to solution providers be included in the language.

Stegall said the appointment termination question will change to a yes-or-no question asking whether the company has terminated the appointment. She said the form will also state that the company should process the appointment termination using its existing process, and companies will remain responsible for processing their own terminations.

Richmeier said the form is intended only to notify the state of a termination for cause. She said the form is not a request for the state to terminate the appointment. She said the appointment termination question indicates to the department that the appointment has been terminated. Jones said the phrase "all other appointment changes" at the top of the form implies that this appointment does not need to be processed electronically, and she suggested clarifying that all appointments should be processed electronically. Richmeier recommended removing the word "other." Delgado suggested removing the word "electronically." She asked whether the form is a process separate from the usual NIPR termination process and said the sentence would be unnecessary if both processes are the same. Tozer said the statement should provide that all appointment changes are processed electronically through NIPR, regardless of whether the termination is for cause, and he agreed that "other" could be confusing. Wall suggested referring to all appointment changes that are not for cause.

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Richmeier said an interested party suggested describing the form as a supplement to the standard appointment change process. Tozer said the language should make clear that the form is separate from the appointment termination so companies do not assume the state will terminate the appointment on their behalf. He said some states do not have appointments and some companies submit appointment terminations through third parties, which eventually route through NIPR. Tozer suggested the ad hoc drafting group review the following language for revision based on today's discussion: "All other appointment changes may be electronically processed using NIPR (National Insurance Producer Registry) unless a different format is prescribed by the state insurance commissioner."

Richmeier said a state insurance department recommended moving the reason for termination higher on the form. She said the ad hoc drafting group decided to leave the section in its current location because the form is short, but that the reason for termination will become a mandatory field. She said the reasons will be limited to those in the *Producer Licensing Model Act* (#218), so the form is used only for a termination for cause. An "other" option will be available for outliers but should be used only when applicable.

Richmeier said the American Council of Life Insurers (ACLI) requested clarity on the question asking whether consumers were harmed. She said the ad hoc drafting group is suggesting adding language stating "regardless of if the consumers were made whole, the policy canceled or other non-monetary correction was made." Colin Masterson (ACLI) said the language provides the clarity the ACLI sought.

In response to a question, Richmeier said she is not aware of a feature that would allow documents, such as the producer's termination letter, to be uploaded when the form is submitted. She said the Task Force hopes to add this feature as the project is built out. Richmeier said the form serves as a first step, providing regulators with the information needed to determine whether to investigate further. Richmeier said the termination letter requirement will need to be adjusted, and departments will still need to request investigative files.

Delgado said Texas does not allow terminations for cause to be processed electronically through NIPR. She said she understood the new form to be an electronic version that would allow attachments. She questioned the value of the form to regulators, given that most regulators already receive electronic notice of terminations for cause. Stegall said the current process is not uniform. She said the dropdown options in the electronic system vary and some do not include termination for cause, so a company may terminate a producer for cause without notifying the regulator. Stegall said the form also provides a reliable company contact, which avoids regulators spending a week or two locating someone to provide additional information.

Richmeier said the form replaces forms that state insurance departments already use, such as the Kansas termination-for-cause form. She said an electronic termination does not provide information, such as the number of consumers harmed or prior investigations, which departments request individually from carriers after each submission. Richmeier said the goal is to give carriers a single method to meet the notification requirement and to give a department enough information to decide whether to pursue an investigation.

Richmeier said the ACLI asked for clarification on how companies should interpret the question on consumer complaints. She said the ad hoc drafting group recommends not setting a look-back period for the number of complaints a company received about a terminated producer. Stegall said the question asks for complaints sent directly to the company, not complaints received from regulators, because consumers sometimes send complaints directly to companies. She said several complaints of the same type over a period of years can show a pattern. In response to a question from Masterson, Stegall said the question applies to the company submitting the form and not to affiliated companies. Masterson asked whether the ad hoc drafting group considered adding an option for a company that cannot reasonably provide a definitive answer. Stegall said the form will include an unknown box to allow companies to answer yes, no, or unknown.

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In response to a question about whether the form collects information on policyholders who sue agents and companies without filing a complaint, Richmeier said the form does not. She said the form collects only the information a department needs to determine what additional information or investigative files to request. She said that limiting personal information helps the form comply with state open records.

Stegall said the term "investigation" means whatever investigation the company conducted to conclude that a producer should be terminated and reported. She said companies differ in the scope of their investigations, with some conducting detailed investigations and others conducting a cursory investigation. Stegall said there should be an investigation if a company reports a producer.

Richmeier said the attestation on the form is uniform with attestations on other forms provided by the NAIC or posted on department websites. She said the Task Force will review the attestation language again to ensure consistency with other attestations in use.

Richmeier said the National Association of Mutual Insurance Companies (NAMIC) recommended adding the term "business entity" to the producer box at the top of the form to acknowledge that the form applies to individuals and business entities. No concerns were raised, and this change will be made. Lisa Brown (American Property Casualty Insurance Association—APCIA) asked for confirmation about whether the form could be used for an agency termination for cause. Richmeier said it could and that the addition of business entity would address this issue.

In response to a question from Delgado, Stegall said the form will include multiple dropdown boxes for multiple NAIC company codes. She said this is needed because a producer may be appointed with multiple companies.

Richmeier said the ad hoc drafting subgroup would review the comments and provide a revised form for the Task Force's review, with the intent of adopting the form during its Nov. 16 meeting at the Fall National Meeting.

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

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Company Notice of Termination for Cause

Company report of termination FOR CAUSE only.
This form should not be used for normal production cancellations.

All other appointment changes may be electronically processed using NIPR (National Insurance Producer Registry) unless a different format is prescribed by the state insurance commissioner.
Mandatory fields are highlighted in yellow.

⇨ **Producer/Advisor Information**

Producer name as it appears on PDB: [text block]

NPN (National Producer Number): [number block]

Producer's State of Residence: [text block]

Resident State License #: [text block] (optional)

Producer's Last Known Address: [text block]

⇨**Reporting Insurer Information:**

Name of Insurance Company: [text block]

NAIC CoCode: [number block] [add 5 CoCode text block]

Address of Insurance Company: [text block]

Requests for additional information related to this termination for cause are to be sent directly to the "Authorized Contact for Investigation Follow Up" identified below.

Authorized Contact for Investigation Follow Up:
The Department may request additional information on this submission.

NOTE: DIRECT contact information is required; general 800 numbers and shared mailboxes are not acceptable.

Contact Name: [text block]

Title: [text block]

Contact Phone Number: [text block] (ext)

Contact email address: [text block]

Alternate Contact Name: [text block]

Alternate Contact mail address: [text block]

Email Address: [text block]

Title: [text block]

Name of Firm Contact: [text block]

⇨ **Additional Information REQUEST FOR TERMINATION OF APPOINTMENT**

Effective Date of Termination: [text block]
APPOINTMENT HAS BEEN TERMINATED IN THE SYSTEM BY THE COMPANY Y/N
*COMPANY NEEDS TO TERMINATE APPOINTMENT IN THE SYSTEM

Was the producer notified of the termination? Y/N

Date Notified: [text block]

Line(s) of business included in this termination for cause: [text block]

Is there a prior complaint history with this producer? [Yes/No drop down]

Did the insurer conduct an investigation of this producer? [Yes/No drop down]

Investigation start date: [text block]

DRAFT

Were other producers identified in the insurer's investigation? [Yes/No drop down – add blocks to include the names/NPNS]

Producer name [NAME] [NPN]
Producer name [NAME] [NPN]

Note: a form submission should be made for each individual producer terminated as well as added to the boxes above.

Did the insurer file a fraud referral against the producer? [Yes/No drop down]

OFRS NAIC Fraud ID [text block] "if applicable"
{additional text block]

If Yes, identify the agencies with which the referral was filed: [check boxes: NAIC-OFRS; NICB; Other – with blank space to identify the agency, etc.)

Was the producer contracted with a producer agency at time of misconduct/investigation? [Yes/No/Unknown drop down]

If Yes, identify the agency and NPN: [text block]

⇨ **Reason for Termination**: [drop down of choices from NAIC Producer Licensing Model Act Section 12 A (1)–(14)]

If a termination is for any of the reasons listed in the NAIC Producer Licensing Model Act, Section 12, "License Denial, Non-Renewal or Revocation of Model #218," insurers are required to notify the insurance commissioner(s) within thirty (30) days of the effective date of the termination for cause. See attached PRODUCER LICENSING MODEL ACT document. **Please choose all that apply.**

States listed below are being notified of a termination for cause against the producer/advisor identified on this document		
State	Business was sold in this state	Consumers harmed regardless if the consumer was made whole, policy cancelled, or other non-monetary correction.
[drop down]	[Yes/No drop down]	[Yes/No drop down]

⇨ **Attestation by Authorized Insurer/Representative**

I attest and affirm that I am authorized to submit all statements on this form. I further attest that any supporting documents are true and accurate, and to the best of my knowledge; and are made for the purpose of notifying the state(s) indicated regarding the appointment termination for cause, as indicated by this completed form.

Name of Insurer's Representative: [text block] Title: [text block]

Email Address: [text block]

Secondary Email Address: [text block]

Mailing Address: [text block]
Secondary Mailing Address: [text block]

Direct Phone Number: [text block]

Secondary Phone Number: [text block]

Insurer Representative Signature: _____ Date: [date text block]

DRAFT

Disclosure: This termination for cause notice is submitted in accordance with applicable state and federal regulations and may be shared with regulatory authorities and authorized parties as permitted by law.

DRAFT

Draft: 10/2/26

Revisions adopted by the Executive (EX) Committee and Plenary, XX, XX
Revisions adopted by the Market Regulation and Consumer Affairs (D) Committee, XX, XX
Revisions adopted by the Producer Licensing (D) Task Force, XX, 2026
Revisions adopted by the Uniform Education (D) Working Group, Oct. 2, 2026

APPENDIX B

Continuing Education Recommended Guidelines for Online Courses

Goal: To deliver functional computer-based internet courses that offer quality insurance and/or risk management material in a password-protected online environment.

Key Components:

- Material that is current, relevant, accurate, and that includes valid reference materials, graphics and interactivity.
- Clearly defined objectives and course completion criteria
- Specific instructions to register, navigate and complete the course work
- Technical support/provider representative should be available during business hours and response provided within ~~24hours~~ 1 business day of initial contact.
- Instructors/subject matter experts must be available to answer student questions during provider business hours
- Process to authenticate student identity such as passwords and security prompts
- Method for measuring the student's successful completion of course which includes the material, exam and any proctor requirements.
- Process for requesting and receiving CE course-completion certificate and reporting student results to the appropriate regulator
- Require each agent to enroll for the course before having access to course material.
- Prevent access to the course exam before review of the course materials.
- Prevent downloading of any course exam.
- Provide review questions at the end of each unit/chapter and prevent access to the final exam until each set of questions are answered at a 70% rate.
- Provide final exam questions that do not duplicate unit/chapter questions.
- Prevent alternately accessing course materials and course exams. This does not apply if the state allows for "open book" exams.
- ~~Have monitor affidavit containing specific monitor duties and responsibilities printed for monitor's use to direct the taking of the final exam. Monitor will complete the affidavit after the exam is completed. (This only for states that require a monitored exam).~~
- For states that require a monitored exam, have affidavit containing specific monitor duties and responsibilities available for monitor's use to direct the taking of the final exam. Monitor will complete the affidavit after the exam is completed.

Final Assessment (exam) Criteria:

- Minimum of 10 questions for 1 credit hour course with additional 5 questions for each subsequent credit hour and a score of 70% or greater
- Exam must consist of multiple-choice questions with at least four answer options.
- At least enough questions to fashion a minimum of 2 versions with a least 50% of questions being new/different in each subsequent version
- Inability to print the exam or to view the exam prior to reviewing material
- Proctor, if required by the state, who verifies identity by photo identification and processes affidavit testifying the student received no outside assistance

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Procedures to determine Appropriate Number of Credit Hours:

Word Count/Difficulty Level

- Divide total number of words by 180 (documented average reading time) = number of minutes to read material
- Divide number of minutes by 50 = credit hours
- Course difficulty level is identified by the CE provider on the CER form and should be based on the NAIC CE Standardized Terms-Definitions for basic, intermediate and advanced course difficulty levels.
- Multiply number of hours by 1.00 for a basic level course; 1.25 for an intermediate level; 1.50 for an advanced course for additional study time = total number of credit hours (fractional hours rounded up if .50 or above and rounded down if .49 or less)

Interactive Course Content

- Elements included in the online course, in addition to text, such as video, animation, interactive exercises, quizzes, case studies, games, and simulations.
- Interactive elements should be applicable to course material and facilitate student learning.
- Only mandatory interactive elements should be included in the calculation of CE credit hours.
- Calculation of CE hour credits should be based on the run time of the interactive elements.
- CE providers will indicate run time of the interactive elements in the course content and upon request provide access to the state for review of the course.

Professional Designation Course

- Course that is part of a nationally recognized professional designation
- Credit hours equivalent to hours assigned to the same classroom course material

Final Assessment

- Time spent completing the final assessment should not be used in calculation of CE credit hours.

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Revisions adopted by the Executive (EX) Committee and Plenary, XX, XX
Revisions adopted by the Market Regulation and Consumer Affairs (D) Committee, XX, XX
Revisions adopted by the Producer Licensing (D) Task Force, XX, 2026
Revisions adopted by the Uniform Education (D) Working Group, June 4, 2026

APPENDIX C

COURSE GUIDELINES FOR CLASSROOM WEBINAR/WEBCAST DELIVERY

- These guidelines are intended to apply to courses conducted and viewed in real time (live) in all locations and are not intended to apply when courses have been recorded and are viewed at a later time or to other online courses.
- Each student will be required to log in to the webinar using a distinct username, password and/or email.
- Students that view webinars in group settings, ~~which is~~consisting of two or more individuals, should alternatively verify their participation in the form of sign-in and sign-out sheets submitted by a ~~monitor~~ proctor, as defined in the NAIC Standardized Definitions for CE, with an attestation or verification code.
- The provider will verify the identity and license number, or National Producer Number (NPN), of all students.
- A provider representative, using computer-based attendance-monitoring technology, must monitor attendance throughout the course.
- The provider must have a process to determine when a participant is inactive or not fully participating, such as when the screen is minimized, or the participant does not answer the polling questions and/or verification codes.
- For webinars not given in a group setting, no less than two polling questions and/or attendance verification codes must be asked, with appropriate response provided, at unannounced intervals during each one-hour webinar session to determine participant attentiveness.
- The provider will maintain an electronic roster to include records for each participant's log-in/log-out times. If required by ~~states~~states, chat history and polling responses should be captured as part of the electronic record.
- When a student is deemed inactive or not fully participating in the course by the course monitor or~~f~~ failure to enter appropriate polling question response or verification codes, continuing education (CE) credit is denied.
- All students and the instructor(s) do not need to be in the same location.
- Students in all locations must be able to interact in real time with the instructor. Students should be able to submit questions or comments at any point during the webinar session.
- The course pace must be set by the instructor and ~~does~~ not allow for independent completion.
- Instruction time is considered the amount of time devoted to the actual course instruction and does not include breaks, lunch, dinner or introductions of speakers.
- One credit will be awarded for each 50 minutes of webinar/webcast instruction, and the minimum number of credits that will be awarded for webinar/webcast courses is one credit.
- The provider must have a procedure that informs each student in advance of course participation requirements and consequences for failing to actively participate in the course.
- A comprehensive final examination is not required.

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Continuing Education Reciprocity

Comments

Nov. 4, 2026

ExamFX (Cynthia Davidson)

RegEd (Stephen Froikin)

WebCE (Scott McKelvey)

October 27, 2026

TO: NAIC Producer Licensing Task Force
RE: Comments on CE Reciprocity Agreement
Appendix B Continuing Education Recommended Guidelines for Online Courses

As a national education provider of continuing education, ExamFX appreciates the opportunity to submit comments to the Producer Licensing Task Force on Appendix B of the CE Reciprocity Agreement, Continuing Education Recommended Guidelines for Online Courses.

First, with regard to the "Final Assessment" bullet points in Appendix B, we have two suggested additions:

- Require the agent to sign an attestation that both the course and the exam were completed without assistance from any person, program, or device. (*This requirement is in place in multiple states and would seem to be a best practice.)*
- Have policies and processes in place for when noncompliant behavior is detected (ie, browser refreshers, proxy completions, attempts to defeat exam security, etc.)

Second, ExamFX would be in favor of updating the word count formula that is used to establish the appropriate number of credit hours for an online course. The original formula was developed years ago based on "average adult reading speed of 180 words per minute" as a general benchmark for calculating credit hours, and does not take into account interactive course elements such as video, exercises, simulations, or hands-on assessment activities.

Data from instructional designers of online courses shows that comprehension, elaboration, and application cause slower reading speeds compared with straightforward text consumption.

Educational researchers distinguish between:

1. Reading to understand
2. Reading to learn
3. Reading to master and apply

As task difficulty increases, readers slow down to integrate new concepts, connect ideas, and encode information into memory. The objective is not simply to finish reading the text but to build durable knowledge.

For compliance, certification, and professional skills training like continuing education, a reasonable evidence-informed assumption is:

Learning Goal	WPM Assumption
Read and understand	175-200
Learn new information	125-175
Master technical concepts	100-150
Technical/regulatory mastery with application	75-125

For text-heavy learning, experts recommend:

Seat Time = Word Count ÷ 150 WPM

Then add:

- +15-25% for knowledge checks
- +15-30% for application exercises and actual runtime for videos

Sample Calculation

A 15,000-word course:

- Reading only at 150 WPM = 100 minutes
- Add 25% (25 minutes) for periodic knowledge checks and reflection = 125 minutes
- 25-minutes of video or interactivities = 150 minutes total seat time
- Divide by 50 (50 minutes per credit hour) = **3 credit hours**

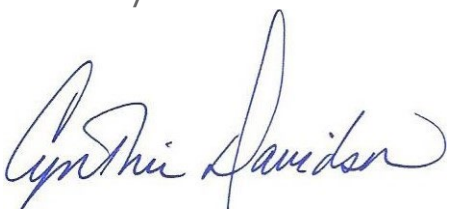
ExamFX would support a change from 180 WPM to 150 WPM as a more realistic benchmark for active learning.

ExamFX agrees with the Online Course Guidelines' use of "Basic", "Intermediate" and "Advanced" classification multipliers to further distinguish a CE course's level of complexity for credit hour purposes. These classifications and multipliers should be retained.

Last, ExamFX is curious whether, in the interest of transparency, education providers should disclose as part of the CER application to what extent the content of an online course has been generated using AI and to what extent the questions on the final (certificate) exam have been generated using AI, as well as the methodologies used to ensure accuracy and relevancy of any AI-generated course content.

ExamFX appreciates the opportunity to participate in this discussion.

Sincerely



Cynthia Davidson, CIC, ITP, SILA-F, CDEI™ (she/her)
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Stephen D. Froikin, JD, MSEd, ChFC, CLU, CASL
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To: NAIC
Date: October 27, 2026
Re: Comments on Appendix B Continuing Education Recommended Guidelines for Online Courses

The following is a response to the Working Group consideration the NAIC formula for determining the number of CE credit hours to be allowed for self-study courses. I am the lead insurance CE course writer at RegEd, Inc., a national provider of continuing education, and have been in that role for 12 years. Prior to that I filled a similar role at Kaplan, Inc. and Dearborn Financial Publishing since 1997.

The current word-count system aims at awarding credit hours for self-study courses on a comparable basis with live instructor-led courses: namely, one credit for one hour spent by the learner. The current word-count formula does not achieve this. Self-study takes longer to complete for each nominal credit hour. There are two reasons for this:

First: exams, review questions, and other interactions are excluded from the calculation. I understand that some state statutes make this exclusion mandatory for exam questions. This is not ideal because the exam takes up a significant amount of time, and from an instructional design perspective contributes significantly to the learning experience. They are not an after-thought.

Furthermore, the rules that automatically exclude exams from the credit-hour calculation do not automatically exclude the counting of time spent answering questions and completing other interactions within the course content itself. These interactions often contribute to learning more than straight text itself. By not counting these interactions, course creators are disincentivized from creating the most engaging and instructive possible for licensees.

Second, 180 words per minute is too fast for reading typical insurance CE topics. A CE course is not a novel and can't be readily skimmed. A more reasonable number would be closer to 125 to 150 words per minute that is typical of spoken English—again, aiming at parity with an instructor-led course.

These lower numbers are mathematically implicit in the multipliers found in the NAIC formula that apply for difficult material. But I would argue that you can't anticipate in advance which material would be difficult for a particular learner and which would not. So-called beginner courses tend to be surveys of multiple topics and quite difficult for a true beginner. While advanced courses tend to focus on a small number of topics and be quite easy for a licensee who has been working in the area for years. A better approach would be to simply make the multiplier applicable to all courses. The result would be equivalent to using a lower number of words per minute to compute CE credit.

Why do we have credit-HOURS at all, instead of a credit system that is unrelated to time (perhaps simply based on mastery of a topic)? It is to set the expectations of the learner that the experience will take a specific amount of time. The current methodology misses the mark. And by missing the mark, encourages learners to skim and take other shortcuts that degrade the educational experience.

I believe that the modifications suggested above will bring the credit-hour calculation more in line with the likely experience of the learner while simultaneously encouraging course writers to make their courses more engaging and ultimately more educational for licensees.

Stephen D. Froikin, JD, MSEd, ChFC, CLU, CASL
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Thank you for the opportunity to provide feedback on the CE Reciprocity Agreement – Recommended Guidelines for Online Courses, Appendix B. WebCE, a provider of online continuing education nationwide, works with states under the Reciprocity Agreement often and we feel there is an opportunity to improve the understanding of the exam banks and the following bullet:

> "*At least enough questions to fashion a minimum of 2 versions with a least 50% of questions being new/different in each subsequent version*"

The first way this is sometimes understood is as a single statement referring to exam bank size. In that view, an exam of 50 questions would need 75 total in the bank so that each attempt, including the second, could differ by 50%.

The next way this is sometimes understood is as two separate statements: one relating to exam bank size and the other related to variance between exams. In that interpretation, the exam bank for a 50-question exam needs 100 questions so that there are enough for two unique versions. Then, separately, the 50% variance rule is applied to ensure second and third attempts differ from the first.

Finally, a third interpretation has focused on the concept of "2 versions" which has resulted in an expectation that a course has two, pre-generated, static exams that alternate rather than dynamically generated exams from a question bank.

The first interpretation seems to be the most common across the states: expecting a 50% larger question bank than is necessary to deliver an exam. If that is correct, our recommendation would be to split this into two separate bullets as follows:

- Exam banks must consist of an additional 50% more questions than are needed to deliver a single exam.
- Exam delivery should be fashioned in such a way as to prevent subsequent attempts from including more than 50% duplicated questions as on the previous attempt.

Thank you for the opportunity to be heard and to support this community with our feedback. Please reach out if we can be of further assistance.

Scott McKelvey | Chief Operating Officer
972-616-1141
www.webce.com

NATIONAL ASSOCIATION OF INSURANCE COMMISSIONERS

Virtual Meeting

ADJUSTER LICENSING (D) WORKING GROUP
September 22, 2026

Summary Report

The Adjuster Licensing (D) Working Group met Sept. 22, 2026. During its meeting, the Working Group:

1. Adopted its July 15 minutes (*see NAIC Proceedings – Summer 2026, Producer Licensing (D) Task Force, Attachment Two*).

2. Received an update on the proposed revisions to the adjuster licensing guidelines, noting that the revised guidelines are at the Producer Licensing (D) Task Force for discussion.

3. Received an update from the National Insurance Producer Registry (NIPR) on the Designated Home State (DHS) application solution, including: 1) agreement by 31 of the 32 adjuster states to use the Producer Database (PDB) to determine DHS eligibility, 2) the addition of DHS information reported by Iowa, Puerto Rico, and Texas to the PDB; and 3) planned removal of nonuniform exam and continuing education (CE) location questions from the application.

4. Discussed potential 2027 priorities, including: 1) CE requirements for nonresident adjusters; 2) best practices for communicating with DHS adjusters; 3) transitions when a state begins licensing staff adjusters; 4) a streamlined process for modifying an adjuster's DHS; and 5) leveraging technology to reduce manual processing.

5. Discussed emergency adjuster licensing and the importance of applicant identity and residency verification.

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Virtual Meetings

PRODUCER LICENSING UNIFORMITY (D) WORKING GROUP
November 9, 2026 / October 7, 2026 / September 15, 2026 / August 25, 2026

Summary Report

The Producer Licensing Uniformity (D) Working Group met Nov. 9, Oct. 7, Sept. 15, and Aug. 25, 2026. During these meetings, the Working Group:

1. Adopted revisions to the following 13 chapters of the *State Licensing Handbook*: Chapters 1, 6, 8, 9, 10, 11, 12, 13, 14, 18, 19, 24, and 30. Chapter 25 required no changes, and Chapter 7 was not reviewed because its uniform application language is tied to the 1033 waiver process. The revised chapters will go to the Producer Licensing (D)Task Force for a 30-day exposure period and potential adoption at the Fall National Meeting.

2. Reviewed state responses to the *Uniform Licensing Standards* (ULS) chart. Of the 46 standards, 13 reflected 100% compliance, and six were below 80%. The standard with the lowest compliance (60%) was fingerprinting for background checks, which generally requires legislative action. The Working Group identified differing interpretations of the standards, particularly for limited lines, statewide criminal history checks, and the continuation process.

3. Agreed on next steps for the ULS. The Working Group, with NAIC staff assistance, will ask states that reported noncompliance with the lowest-performing standards to confirm their responses and explain any noncompliance. The Working Group will also consider education and clarification of the standards.

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Virtual Meeting

UNIFORM EDUCATION (D) WORKING GROUP
November 10, 2026 / September 16, 2026

Summary Report
The Uniform Education (D) Working Group met Nov. 10 and Sept. 16, 2026.

1. During its Nov. 10 meeting, the Working Group took the following action:
   A. Adopted its Sept. 16 minutes.
   B. Discussed the NAIC standardized instructor approval form. The Working Group reviewed the statutory background questions and identifying information, such as National Producer Number (NPN), Social Security number (SSN), and date of birth; reciprocal instructor approval; course category options; potential subject-matter expert (SME) assistance; and coordination with electronic form vendors. The Working Group will review the updated revisions during its December meeting.
   C. Adopted revisions to Appendix B and Appendix C of the Continuing Education Reciprocity (CER) Agreement. The Working Group provided the revisions to the Producer Licensing (D) Task Force, which are currently under review.
   D. Discussed prerecorded webinars. Based on state practices and the webinar delivery guidelines, the Working Group reached consensus that a prerecorded course should be treated as self-study when the instructor does not lead a live discussion.
   E. Discussed potential 2027 items of interest, including a uniform introductory statement, uniformity in reporting course approvals, the use of artificial intelligence (AI) in course content and instruction, state course audit and approval criteria, course-navigation guardrails and seat-time requirements, and review of the approved and non-approved course lists.

2. During its Sept. 16 meeting, the Working Group took the following action:
   A. Adopted its July 8 minutes (*see NAIC Proceedings – Summer 2026, Producer Licensing (D) Task Force, Attachment Nine*).
   B. Discussed the NAIC standardized instructor approval form.
   C. Discussed Appendix B of the CER Agreement.

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