

Via email to:

Richard Tozer

VA State Corporation Commission

Chair, NAIC Producer Licening Continuing Education Working Group

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Greg Welker,

Sr. Antifraud and Producer Licensing Program Manager

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June 17, 2025

Re: Suggested Edits to Chapter 8 Of the Producer Handbook

Dear Mr. Tozer:

Below please find some suggested edits to Chapter 8 of the Producer Handbook regarding the examination in other than English. The intent of the suggested edits is simply to acknowledge that a greater number of states currently offer the exam in other than English than was the case when the Producer Handbook was originally drafted. And that there may be benefits to doing so. The existing language highlighting caution when considering such a change is left intact. Proposed Edits:

Thank you and the members of the Continuing Education Working Group for your consideration.

Examinations in Languages Other Than English

A number of states have determined to offer the producer exam in a language other than English (typically Spanish) in recent years, and this trend appears to be growing. The decision to offer the exam in other than English may turn on several factors, including state demographics and testing provider resources. Providing the exam in other than English may be tool that increase access to otherwise qualified applicants from diverse communities. Some industry experts suggest caution about using translated or interpreted exams. The material may not directly translate into equivalent terms or meaning. Cultural biases might cause incorrect interpretation of a meaning. Some experts recommend that tests should be developed and administered in English, especially if other materials necessary to perform job duties for the profession, such as contracts, are in English. State licensing directors should review state law and consult with legal counsel about the appropriateness of offering examinations in a foreign language.

Thank you and the members of the Continuing Education Working Group for your consideration.

Sincerely,

