

Draft: 11/25/24

Producer Licensing (D) Task Force
Denver, Colorado
November 17, 2024

The Producer Licensing (D) Task Force met in Denver, CO, Nov. 17, 2024. The following Task Force members participated: Larry D. Deiter, Chair (SD); Glen Mulready, Vice Chair, represented by Erin Wainner and Courtney Khodabakhsh (OK); Lori K. Wing-Heier represented by Heather Carpenter (AK); Mark Fowler represented by Jimmy Gunn (AL); Ricardo Lara represented by Charlene Ferguson (CA); Trinidad Navarro (DE); Doug Ommen represented by Mathew Cunningham (IA); Dean L. Cameron (ID); Holly W. Lambert represented by Ronda Ankney (IN); Vicki Schmidt represented by Monicka Richmeier (KS); Sharon P. Clark (KY); Timothy J. Temple represented by Matt Stewart (LA); Marie Grant represented by Mary Kwei (MD); Grace Arnold represented by Jacqueline Olson (MN); Chlora Lindley-Myers represented by Marjorie Thompson (MO); Mike Chaney represented by Vanessa Miller (MS); Jon Godfread represented by Janelle Middlestead (ND); Eric Dunning represented by Megan VanAusdall (NE); Judith L. French represented by Todd Oberholtzer (OH); Andrew R. Stolfi represented by TK Keen (OR); Michael Humphreys represented by David Buono and Gary Jones (PA); Elizabeth Kelleher Dwyer represented by Mariel Garcia and Rachel Chester (RI); Cassie Brown represented by Randall Evans (TX); Jon Pike represented by Randy Overstreet (UT); Scott A. White represented by Richard Tozer (VA); and Allan L. McVey represented by Robert Grishaber (WV).

1. Adopted its Oct. 31 Minutes

The Task Force met Oct. 31. During this meeting, it took the following action: 1) adopted its Summer National Meeting minutes; 2) adopted its 2025 proposed charges; 3) adopted amendments to the NAIC's Uniform Licensing Applications; 4) discussed amendments to the *Public Adjuster Licensing Model Act* (#228); and 4) discussed the draft 1033 waiver template.

Commissioner Navarro made a motion, seconded by Miller, to adopt the Task Force's Oct. 31 minutes (Attachment One). The motion passed unanimously.

2. Adopted Amendments to Model #228

Commissioner Navarro said Buono provided a detailed review of the Public Adjuster Licensing (D) Working Group's process and substantive changes to Model #228 during the Producer Licensing (D) Task Force's Oct. 31 meeting. The discussions on the model began in May 2023 when the Producer Licensing (D) Task Force adopted a charge to review and amend Model #228. The Public Adjuster Licensing (D) Working Group adopted the proposed revisions in July 2024 which were then presented to the Producer Licensing (D) Task Force at the Summer National Meeting. He said the Producer Licensing (D) Task Force deferred the adoption of the model to receive additional comments due to industry concerns about the compensation fee caps of 10% for catastrophic claims and 15% for all other claims.

Steve McCaffrey (American Association of Public Insurance Adjusters—AAPIA) said the AAPIA is concerned with the fee caps being proposed. McCaffrey said 70% of states do not allow parties to negotiate their fees for non-catastrophic losses and that the system has worked well for consumers. McCaffrey said the optional language regarding fees set forth in the current model is fair to the industry, maintains consumer choice, and should not be changed to the proposed language with specific fee cap percentages of 10% for catastrophic claims and 15% for all other claims.

Draft Pending Adoption

Commissioner Navarro said the issue of fee caps has been discussed and that each state will determine what amendments to the model will be implemented. Commissioner Navarro made a motion, seconded by Commissioner Clark, to adopt the proposed amendments to the model. The motion passed with Alaska, Idaho, and Ohio abstaining and Texas voting no.

3. Discussed the Draft 1033 Waiver Template

Director Deiter said a small group of regulators is continuing to review the comments on the proposed template. The group has recognized a person must seek written consent from their home state and that non-residents should not have to apply for a 1033 waiver. At the same time, the template recognizes there could be situations where a nonresident may seek a 1033 waiver, such as when the person's home state does not, as a matter of regulatory policy, issue any waivers or when a state limits the scope of its waivers to activities within its jurisdictions.

Director Deiter said the definition of "conviction" is consistent with the definition used on the NAIC's Uniform Licensing Applications. The following statement is now a drafting note: "States may include in the definition of conviction a plea in abeyance, a diversion, or an expunged conviction."

Ferguson said California is not able to support the draft 1033 waiver template as it is currently written. California has always interpreted 18 USC §1033 to require the consent of the individual state's commissioner (or equivalent) for consent to "engage in the business of insurance" in that state. Ferguson said §1033 says, "(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 insurance regulatory official authorized to regulate the insurer, which consent specifically refers to this subsection."

Ferguson said the only official "authorized to regulate the insurer" in California is the California Insurance Commissioner. Ferguson said the current suggested revision, which states nonresidents do not need 1033 consent, would strip the commissioner of the discretion provided by 18 USC §1033. Ferguson said it is also problematic to say an elected official is bound by a decision of a regulator of a different state.

Ferguson said states are not consistent in what they consider 1033 crimes and how they grant or deny 1033 consents. Ferguson said California cannot support in favor of a proposal that takes away the regulatory authority of the California Insurance Commissioner.

4. Adopted the Reports of its Working Groups

A. Adjuster Licensing (D) Working Group

Chester said the Working Group met Nov. 6 (Attachment Two) and held an informal planning call on Sept. 11. During these meetings, the Working Group discussed the review of Chapter 18—Adjusters of the *State Licensing Handbook*. Chester said the Working Group is discussing the adjuster-designated home state data, which states are sending to the State Producer Licensing Database. Chester said a survey was conducted, and 29 of the 34 jurisdictions that license independent adjusters indicated that additional front-end validation of an adjuster's designated home state would be beneficial. Chester said 26 jurisdictions confirmed they are reporting their own two-digit state code in the designated home state field. Chester said she is discussing potential next steps with the National Insurance Producer Registry (NIPR) on whether this is a technology solution that could assist states in validating an applicant's designated home state.

Draft Pending Adoption

B. Producer Licensing Uniformity (D) Working Group

Khodabakhsh said the Working Group met Nov. 7 (Attachment Three) and Sept. 10 (Attachment Four) and discussed the review of the *State Licensing Handbook*. The Working Group has determined that approximately 14 chapters need to be reviewed and potentially revised. Khodabakhsh said NIPR staff recently sent out commissioner dashboards to all state licensing directors, providing a snapshot of where specific states stand in terms of uniformity with other states. Additionally, NAIC staff sent an Excel spreadsheet of the NAIC Uniform Licensing Standards requesting each state to self-report compliance with these standards. This information will help set a roadmap or direction for the Working Group's priorities in 2025.

C. Uniform Education (D) Working Group

Tozer said the Working Group met Nov. 13 (Attachment Five), Oct. 29 (Attachment Six), and Oct. 9 (Attachment Seven). Tozer said the Working Group adopted continuing education (CE) audit guidelines during its Oct. 29 meeting. Tozer said the goal is for each state to audit courses for its home state providers, avoiding duplicative efforts, and increasing the number of providers' courses that are audited annually. Tozer said the Working Group also discussed encouraging states to share their audit findings with other states and is looking for a mechanism to share this information among regulators.

Tozer said the Working Group is conducting a survey regarding exam pass rates, and it is reviewing the following chapters in the *State Licensing Handbook* for possible revision: Chapter 6 (Pre-Licensing Education), Chapter 8 (Testing Programs), and Chapter 14 (Continuing Education).

Commissioner Clark made a motion, seconded by Commissioner Navarro, to adopt the reports of the Adjuster Licensing (D) Working Group, Producer Licensing Uniformity (D) Working Group, and the Uniform Education (D) Working Group, including the adoption of the CE audit procedures. The motion passed unanimously.

5. Received a Report from NIPR

Director Deiter said NIPR 2024 revenue for 2024 is \$61.76 million, which is 8.7% over budget. Laurie Wolf (NIPR) said NIPR continues to expand its services to allow electronic solutions for the state and industry to process additional licensee updates including name changes and designated responsible licensed producer (DRLP) changes. To date, NIPR has implemented 26 states for name changes and 21 states for DRLP changes. States using these products are seeing a significant reduction in back-office processing time and effort. Additionally, NIPR continues to implement contact change requests for business entities, and 36 states are using this product.

Wolf said NIPR will offer producer licensing zone training, funded by NIPR and in collaboration with the NAIC, during 2025. This program is a unique opportunity to delve into the intricacies of producer licensing practices, tackle current and emerging industry issues, and foster peer regulator dialogue. The training program will cover producer licensing practices and current and emerging industry issues and encourage dialogue among the state licensing peer regulators.

Wolf said NIPR now serves all 50 states, the District of Columbia, Guam, Puerto Rico, and the U.S. Virgin Islands and is scaling its state team to improve services. Wolf said regulators can expect an expanded team of state relationship account managers and trained state account analysts who will provide a consistent point of contact and streamlined request handling.

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

[SharePoint/NAIC Support Staff Hub/Committees/D CMTE/...](#)

Draft: 2/28/25

DISCUSSION DRAFT

Template for 1033 Consent Process

Suggestion on How to Make 1033 Consent Process Effective and Efficient

Initial Draft of Sept. 29, 2022 - Based on Utah Process for Written Consent
<https://insurance.utah.gov/licensee/producers/exam/1033-consent-process>

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. The 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 which already employ a prohibited person who does not have a waiver 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 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.

2. A prohibited person may seek written consent

- A. A prohibited person must seek written consent prior to engaging in the business of insurance in their Home State. The process for obtaining consent is set forth in this document. The process is available to a prohibited person seeking an insurance license or who wishes to be employed in the business of insurance in a non-licensed capacity in [Insert Jurisdiction]. Nonresident applicants should not have to apply for a 1033 waiver. However, states may issue a nonresident 1033 waiver if a) the Home State did not issue a 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] 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 a fiduciary, official capacity or some other relationship based on trust, or 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. This term means the writing of insurance 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. This term 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 may include in the definition of “Conviction” a plea in abeyance, a diversion, or an expunged conviction.

- D. Dishonesty. Means directly or indirectly to cheat or defraud; to cheat or defraud for monetary gain or its equivalent; or wrongfully to 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 definition for dishonesty includes, lie, cheat, deceive, or defraud. Untrustworthiness, lack of integrity, honesty, fairness, etc.
- E. Felony. A “felony” is 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 authorized imprisonment authorized is more than one year, or if the maximum penalty is death.

4. Applying for written consent (This section is not applicable in jurisdictions that incorporate the 1033 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 or 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. Failure to file a timely amendment may result in denial of written consent or withdrawal of previously granted 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 consent process into the process a jurisdiction uses to issue an insurance license.
- B. Notification of a 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:
- a. the nature and severity of the offense and sentence;
 - b. the date of conviction(s);
 - c. the age at the time of committing the crime(s);
 - d. the nature and extent of injury and/or loss caused by the act for which the prohibited person was convicted;
 - e. unpaid judgment(s);
 - f. 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;
 - g. whether the prohibited person received an expungement or pardon from the sovereign that convicted him or her, and the reason for it;
 - h. 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 and payment of all fines, penalties or other assessments;
 - i. any aggravating or mitigating factors;
 - j. whether other jurisdictions have granted or denied an 18 U.S.C. § 1033 consent;
 - k. the nature and strength of any letters of recommendation and other evidence of rehabilitation;
 - l. the prohibited person's employment history before and after the commission of the crime(s);
 - m. the nature of any consumer complaints in the Department's possession or reported by the prohibited person;
 - n. 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;
 - o. prohibited person's proposed type of employment in the insurance industry;
 - p. extent to which the prohibited person will be supervised in that employment;
 - q. 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; and
 - r. whether the prohibited person has had any professional license revoked or suspended by any state or federal agency.
 - s. whether the prohibited person's civil rights have been restored;
 - t. whether the prohibited person has a pattern of unlawful activity;
 - u. extent an insurance license offers opportunity to engage in further criminal activity;
 - v. 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 consent to engage in the business of insurance according to the terms and conditions of the written consent.

**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 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

1. Full Name of Applicant:

Last Name	First Name	Middle Name
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Have you ever been known by or used another name, including maiden name? ☐ Yes ☐ No

If yes, Identify: _____

Home Address: _____

Street Address	City	State	ZIP
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Mailing Address: _____

P.O. Box or Street Address	City	State	ZIP
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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) _____

Place and Date of Birth: _____

(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.

Attach a full description of your acts involved in the aforementioned matters. Include the following:

- A. dates of charge;
- B. location ;
- C. nature of offense;
- D. written statement explaining the circumstances of each incident;

E. a court certified copy of the charging document; and

F. certified final resolution document from the court.

Attach additional pages if needed.

2. Provide details of the conviction for which you are seeking written consent and the final disposition of these matter(s):

A. sentence;

B. dates of incarceration;

C. dates of probation/parole (if you are currently under probation/parole, include the name and phone number of person supervising your parole or probation;

D. restitution paid;

E. fines/costs ordered;

F. fines/costs paid;

G. pardons granted;

H. information as to whether or not your civil and political rights have been restored; and

I. A copy of the official disposition document from the court, which demonstrates the resolution of the charges or any final judgment.

Attach additional pages if needed.

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

State(s): _____

☐ Granted

☐ Denied

☐ Other _____

Please provide details of outcome of prior or pending applications for Consent:

SECTION III - PRESENT/PROPOSED INSURANCE EMPLOYMENT

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

2. Please describe in detail the office, position, and title to which the requested consent will apply and 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 consent is given, it will be applicable to the activities described herein.) Please include your date of employment or proposed date of employment.

SECTION IV - ATTACHMENTS

Attach the following documents to this Application for written consent. Applications without attachments, or 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. An affidavit 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.

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: _____



Virtual Meeting

ADJUSTER LICENSING (D) WORKING GROUP

February 27, 2025

Summary Report

The Adjuster Licensing (D) Working Group met Feb. 27, 2025. During this meeting, the Working Group:

1. Discussed its 2025 charges and priorities.
2. Discussed its review of Chapter 18—Adjusters of the *State Licensing Handbook*. The Working Group distributed Chapter 18 for comment in 2024. It then reviewed the comments received and developed a revised version. The Working Group plans to review the chapter and finalize revisions before presenting the final revisions to the Producer Licensing Uniformity (D) Working Group.



Virtual Meeting

PRODUCER LICENSING UNIFORMITY (D) WORKING GROUP

February 26, 2025

Summary Report

The Producer Licensing Uniformity (D) Working Group met Feb. 26, 2025. During this meeting, the Working Group:

1. Discussed its charges and priorities for the year, including reviewing and updating the NAIC Uniform Licensing Standards (ULS) compliance charts and reviewing the *State Licensing Handbook* (Handbook).
2. Reviewed the Handbook and determined that 14 chapters need to be reviewed and potentially revised. The Working Group plans to continue meeting throughout the year to continue its review and present the completed revisions by the 2025 Summer National Meeting.

*Virtual Meeting***UNIFORM EDUCATION (D) WORKING GROUP**

March 7, 2025

Summary Report

The Uniform Education (D) Working Group met March 7, 2025. During this meeting, the Working Group:

1. Discussed its charges and priorities for 2025.
2. Discussed the review of three chapters in the *State Licensing Handbook*: Chapter 6—Prelicensing Education, Chapter 8—Testing Programs, and Chapter 14—Continuing Education. The Working Group will distribute the chapters for comment.
3. Discussed the 2024 continuing education (CE) audit survey that was distributed and noted that it has received 36 responses. The Working Group will follow up with the remaining states to collect their responses.
4. Discussed guidelines for course introduction statements. The Working Group discussed how states provide course introductory statements and plans to continue reviewing to determine a uniform process.
5. Discussed the collection of the 2024 examination pass rates.