

Dear Mr. Romero:

The American Property Casualty Insurance Association appreciates the opportunity to submit comments on OSI's proposed adjuster licensing rules.

Regarding the Proposed Rule, the specific section identified for comment appears on page 8, [3.4.8.13](#) Continuation, Nonrenewal, Cancellation, Denial, Revocation, Suspension, Termination and Reinstatement of License. We respectfully request OSI to consider accepting CE from any state that has a continuing education requirement. OK and FL provide examples:

Oklahoma:

Non-Resident Adjusters are required to complete CE in at least (1) state where they have an active adjuster license. CE requirements should be completed in their resident state as long as that state requires CE. Otherwise, the adjuster may designate a non-resident state where they hold an active license and meet that state's CE requirement. If Oklahoma is their designated home state for CE, then the adjuster is required to complete 24 hours of continuing education. The 24 hours should consist of 3 hours of ethics, 2 hours of legislative update and 19 hours of adjuster general. A licensee holding a property line of authority is required to complete a 1 hour earthquake course *plus a 1 hour flood course for renewals processed beginning January 1, 2019, which will be counted as part of the 19 hour general requirement.

Florida:

CONTINUING EDUCATION RECIPROCITY

If you hold a non-resident all-lines adjuster license in Florida, you are not required to complete Florida continuing education (CE) as long as you've completed a CE requirement in one of the states marked "YES" in the "Continuing Education Reciprocity" column. If you haven't completed a CE requirement in one of these states, you are required to complete Florida's CE requirement.

Section A (3) of the Proposed Rule addresses nonresident licenses issued to individuals. APCI recommends that Section A (3)(d) should be revised as follows:

- (d) If the home state does not require continuing education, the nonresident license cannot be renewed until the licensee:
 - (i) completes the hours required for renewal of the New Mexico resident license by completing courses offered by a continuing education provider that have been approved by the continuing education committee in this state, or
 - (ii) completes equivalent continuing education requirements **in a state where the licensee holds an active license and meets that state's continuing education requirement.** ~~for license renewal for a state that the licensee has designated as the home state; and~~
 - (iii) ~~uploads the certificates of completion electronically or as otherwise directed by the superintendent.~~

While not specifically addressed in this Rule, we would also welcome the opportunity to discuss the challenges our members' adjusters encounter with New Mexico's 3-hour live course requirement. Further, it is our experience that OSI's system does not always communicate effectively

with licensees, in light of the discrepancies between the data displayed by OSI compared to an adjuster's own record of credits completed and compliance achieved.

Please let me know if you have any questions about these comments. I would be pleased to discuss them further with you.

Yours sincerely,

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