

**From:** [Larry Blades](#)  
**To:** [Linda Cena](#); [NASAA Comments](#)  
**Subject:** [EXTERNAL] Comments on Proposed Model for IAR CE Program  
**Date:** Wednesday, February 19, 2020 2:43:08 PM  
**Attachments:** [image001.png](#)  
[image002.jpg](#)

---

Hi Linda and other members,

I have several concerns over the proposed program:

1. It is easy to jump on the bandwagon and say, who can object to additional education? However, please remember that you are talking about some of the most highly educated financial advisors in the industry. Few people have the education and desire to become an IAR. If they do, I can't imagine anyone doing this without an honest desire to provide the best possible service to their clients. I, for one, am not convinced there is a need for this additional burden.

2. Have you considered that many, if not most, of the IARs are also licensed insurance representatives in their respective states? Products such as annuities that are inside a retirement plan, cannot be sold without an insurance license. Licensed agents already are subject to many hours of continuing education. Courses with topics such as ethics are already required to be completed. Product courses in many cases will also be duplicated.

3. It appears that you have already decided to allow IARs holding other credentials requiring ongoing CE to be exempt from this new requirement. If you must create a new burden, then you should also exempt anyone that is required to complete insurance CE.

- Before you say, "oh that's different", realize that if it is different, then it is the fault of the State regulators and not that of the agents and IARs.

- Many insurance agents also work in financial planning and financial advice. They may not be making specific investment recommendations, but they are providing guidance on how much of a clients' budget to spend on insurance and on investments.

**Recommendation:**

If you are truly serious about reforming the financial advisor industry, then go all the way and **COMBINE** all the requirements for continuing education to include everyone holding any type of financial license including: all insurance licenses; all Series Investment licenses; All specific credentials; CPAs; and JDs practicing in the financial arena.

A total of 24 hours, completed over a two-year period, is plenty of education to keep financial professionals "up to speed" with the current financial marketplace. My thought is three hours of ethics; Three hours of how to do what is in your clients best interest; three hours of AML and current operations of the US financial system; followed by a group of classes the individual can choose from depending upon their specific interests. These classes should be completed without the need for additional tests. These are not licensing courses; they are intended for improving one's education and knowledge of the subject matter.

It is time to keep this simple and easily understood by all. It is ridiculous to require people who have already spent considerable time acquiring various licenses, to have to take additional time away from their clients in order to complete additional CE courses many are already completing.

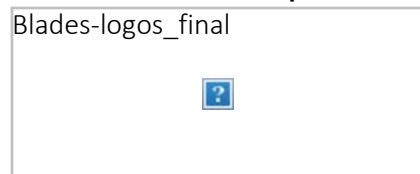
**Additional Information regarding your listed questions in the request for comment:**

1. I addressed hours and reporting period in my above comments. The grace period should be at least one year and covering it in the commentary is appropriate.
2. I addressed the components above and number of hours in each. Hours should be allowed to carry over for one renewal period. Sometimes an advisor wants more information on a particular subject and may take an extra class or two. Carry-over should be allowed.
3. As I stated above, all categories of professionals in the financial arena should be treated the same with one set of continuing education for all licenses and designations.
4. Including in the IARD is likely to lead to a heated discussion about State vs Federal rights to administrator this type of program. I think it is extremely confusing to the consumer to understand one set of rules in one state and upon moving, discover that the rules are different. We are a much more transient society today than in the past. To avoid confusion and keep a level playing field for all professionals and clients, I think all registrations and maintenance should be through a Federal system and not the individual States.
5. I believe one system (see comments above) that includes all financial professionals is much more workable. Adding yet another rule that attempts to do the same thing as other rules, just to a slightly different group of people, is not appropriate or a worthwhile use of everyone's time. If I could do business with only one license, I would feel differently. However, I must hold 5 different licenses and 3 different registrations in order to do the work I wish to do – helping my clients to make the best financial decisions they can make.
6. I have addressed many different legal and policy concerns throughout my comments. One final comment:

Keep it Simple! We have enough complicated rules to follow.

Regards,  
Larry

**Larry R. Blades**  
**Investment Advisor Representative**



[www.NMRetirementSolutions.com](http://www.NMRetirementSolutions.com)



4600 Manitoba Rd NE  
Rio Rancho, NM 87144

***Investment advisory services are offered through Retirement and Investment Solutions, LLC a Registered Investment Advisor in the state of New Mexico.***

PAST RESULTS ARE NOT NECESSARILY INDICATIVE OF FUTURE RESULTS AND NO REPRESENTATION IS MADE THAT A CLIENT WILL OR IS LIKELY TO ACHIEVE RESULTS SIMILAR TO THOSE SHOWN. THIS E-MAIL AND ANY ATTACHMENTS ARE INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL, AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. If the reader of this e-mail is not the intended recipient, or the employee, agent or representative responsible for delivering the e-mail to the intended recipient, you are hereby notified that any dissemination, distribution, copying, or other use of this e-mail is strictly prohibited. If you have received this e-mail in error, please reply immediately to the sender.