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**To:** [NASAA Comments](#); [Linda Cena](#)  
**Cc:** [Joseph Malfeo](#)  
**Subject:** [EXTERNAL] NASAA Model Rule on IARE Continuing Education COMMENT  
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Hello-

Thank you for facilitating this comment period. My view is to have CE for all IAR's with **exception** to those that fall under the 5 professional designations that currently qualify for waivers of the Series 65 examination. Under NASAA Model Rule USA 2002 412(e)-1(d), these exemptions are: CFP, CFA, ChFC, CIC, and PFS

The reasoning is because a professional with these designations must complete extensive CE requirements in order to continue holding the designation. Much of the content would be overlapped. Also, there should be curriculum that separates B/D IARs and Independent IARs. Otherwise, there can be confusion for some as to their specific obligations. Thank you.

Regards,

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