



Customized Securities Training Solutions

March 27, 2020

NASAA
Attention: Kameron Hillstrom
750 First Street, NE
Suite 1140
Washington, DC 2002

Nasaacomment@nasaa.org

cenal@michigan.gov

RE: Proposed IAR Continuing Education Program and Accompanying Model Rule

Dear Ms. Hillstrom and Ms. Cena:

WebCE is an education services provider specializing in the financial services industry. We have spent a significant amount of time discussing the proposed IAR continuing education (IAR CE) program and accompanying model rule internally and with our securities continuing education clients.

A thorough review of the model rule reveals that it is similar to other continuing education (CE) requirements in the financial services industry. Our internal and client discussions resulted in an overwhelming vote in favor of this proposed IAR CE requirement.

We are in favor of implementing IAR CE requirements at the state and federal levels and know that as a provider we can create relevant content and deliver it in a compliant manner that includes rapid and accurate reporting. We look forward to working with NASAA to provide quality education products to IARs.

Respectfully submitted,

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