

From: [W. Howard Thompson](#)
To: [NASAA Comments](#); [Linda Cena](#)
Subject: [EXTERNAL] Comments regarding a proposed IAR CE program...
Date: Monday, April 13, 2020 6:17:03 PM
Attachments: [image001.jpg](#)

As stated, the goals are:

- Be effective and valuable for regulators to ensure continued competency by IARs—not simply a “check the box” compliance exercise;
- Be effective and valuable for IARs to maintain and grow their knowledge base—and not simply a “check-the-box” compliance exercise;
- Maximize flexibility in CE content available;
- Minimize duplicative CE requirements to the extent practicable;
- Minimize compliance burdens by leveraging existing systems and technology;
- Minimize costs to individuals completing IAR CE; and
- Promote uniformity among regulators and jurisdictions adopting IAR CE.

These goals are very ambitious.

As a practitioner that has been in the industry for 35+ years, you can't make people learn. And, having designations or CE do not make advisors more competent.

Over my lifetime, I have experienced more and more regulatory red tape, none of which has changed how I manage money nor how I treat my clients. It has been nothing more than an additional cost of both time and money at the detriment of my clients as those resources have been diverted from clients. Additionally, CE programs have created more jobs and costs for the organization that administers the material, classes, tests and reporting. Those funds could be better spent elsewhere. I hate to think of the number of manhours that have already been spent on the surveys, etc. in compiling these proposed CE program.

My suggestion is to provide current relevant articles on a monthly basis for IAR's without reporting or a requirement and charge the IA less.

Regards,

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