

To NAIC Producer Licensing Working Group/Members of the Committee, and Interested Parties

RE Public Hearing/Testimony August 17, 2010 Seattle, WA

From Phillip E Rosebrook, CLU, ChFC, LUTCF
Director of Education, Insurance Training Associates

Thank you again for the opportunity to participate in the testimony before you on a matter of such importance. As I stated in my remarks, I believe that we, as regulators, testing vendors, education providers, managers, insurers, and industry organizations, have a shared obligation and responsibility to provide the candidate with an examination experience of the highest quality, and the public with a producer that is ethical, competent, and professional. Rather than lower the standard for a candidate, we must raise the standard for ourselves.

At the same time we must recognize the licensing, testing, and examination process is only the beginning of a producer's training and education, therefore requiring the examination be at entry level is important.

The efforts of the NAIC in the development of uniform standards in pre-licensing education requirements, continuing education, NIPR and electronic licensing, have resulted in model regulation that vastly improve the quality of these areas.

The creation of a two examination process, the development of one standardized national examination, and a separate state law and regulations exam is the next area needing improvement. General insurance concepts, principles, contracts, policies, coverage's, insurers, underwriting, premiums, and tax considerations, for life, health, or property and casualty insurance, after all are the same in Oregon or Maine, Alaska or Mississippi.

States could continue the application, education, and testing process and requirements as they do now utilizing their current test vendor. The resulting uniformity, equity, and efficiency should create a superior exam nationwide and result in lower costs.

Not unlike taking the Series 6 and Series 63 exams for securities licensing, or taking the life and health exam separate from property and casualty, the candidate is better able to study and learn the material when broken into smaller components.

As an education provider and a member of NAIFA, we support the initiatives as recommended in the Producer Licensing Reform paper published August 2010 by NAIFA and ACLI including; electronic fingerprinting, uniformity in pre-licensing requirements, online education without proctor requirements, a national examination and study guide, availability of pass rates by state and school, test review and evaluation of vendors, and equitable and uniform cost of licensing.

Phillip E Rosebrook, CLU, ChFC, LUTCF is Director of Education at Insurance Training Associates LLC, an online educational provider of insurance pre-license training and continuing education.

He has 40 years in the insurance and financial services industry as an agent, manager, recruiter, and trainer who is licensed in Life, Health, Property and Casualty insurance and as a Registered Representative and Registered Principal.

He has been an instructor at Portland Community College where he taught insurance licensing classes in the fundamentals of life and health insurance and Oregon law as well as continuing education classes in life insurance, and has been a moderator for The American College's Life Underwriter Training Council courses.

He is a member of the local chapter of the National Association of Insurance and Financial Advisors and the Society of Financial Service Professionals