

Proposed Statement on Standards for CPE Programs
EDMAX Feedback

Article 1 – Definitions	
Current Proposed Change	Group Internet based program. Individual participation in synchronous <u>group</u> learning with real time interaction of an instructor or subject matter expert and built-in processes for attendance and interactivity. <u>See Standard No. 8 for examples of group Internet based programs.</u>
EDMAX Proposal	Group Internet based program. Individual participation in synchronous <u>group</u> learning program with real time interaction of an instructor or subject matter expert and built-in processes for attendance and interactivity. <u>See Standard No. 8 for examples of group Internet based programs.</u>
Explanation	Alignment with how other programs are defined (i.e. self study)

Article 1 – Definitions	
Current Proposed Change	Group live program.- Synchronous learning <u>in a group in an</u> environment with real time interaction of <u>participants with each other and with</u> an instructor or subject matter expert that provides the required elements of attendance monitoring and engagement. <u>See Standard No. 7 for examples of group live programs.</u>
EDMAX Proposal	Group live program.- Synchronous learning program in a group in a group environment with real time interaction of <u>participants with each other and with</u> an instructor or subject matter expert that provides the required elements of attendance monitoring and engagement. <u>See Standard No. 7 for examples of group live programs.</u>
Explanation	Alignment with how other programs are defined (i.e. self study). Retention of the word “group” so that it is clear to sponsors that there needs to be more than one participant.

Article 1 – Definitions	
Current Proposed Change	Nano learning program. A program designed to permit a participant to learn a given subject in a minimum of 10 minutes and less than 20 minutes through the use of electronic media (including technology applications and processes and computer-based or web-based technology) and without interaction with a real time instructor. A nano learning program differs from a self study program in that it is typically focused on a single learning objective and is not paper-based. A nano learning program is not a group program. Nano learning is not a substitute for comprehensive programs addressing complex issues.
EDMAX Proposal	Nano learning program. An asynchronous program of learning completed individually without the assistance or interaction of a real time instructor that is designed to permit a participant to learn a given subject in a minimum of 10 minutes and less than 20 minutes through the use of electronic media (including technology applications and processes and computer-based or web-based technology) and without interaction with a real time instructor. A nano learning program differs from a self study program in that it is typically focused on a single learning objective and is not paper-based. A nano learning program is not a group program. Nano learning is not a substitute for comprehensive programs addressing complex issues.

Explanation	Alignment with revised self-study definition
Article 1 – Definitions	
Current Proposed Change	Synchronous. A learning activity group program in which participants engage simultaneously in learning activities.
EDMAX Proposal	Synchronous. A learning activity group program in which participants engage simultaneously in learning activities with a real time instructor.
Explanation	Alignment with but differentiate it from Asynchronous and avoid repeating term “learning activities”

S5-01 – Qualifications of Content Reviewer	
Current Proposed Change	S5-01. Qualifications of content reviewers. Individuals or teams qualified in the subject matter must review programs. <u>The intent of the review is to serve as a quality control procedure to ensure the course content is accurate and current as well as appropriate for CPE. When it is in rare circumstances, it may be impractical to review certain programs in advance, such as lectures given only once such as a matter that must be communicated to participants quickly due to the effective date of the matter (for example, an emerging issue, change in accounting/auditing pronouncement or tax code) or the instructor/presenter is the only subject matter expert within the sponsor organization or the instructor/presenter is a recognized leader within an authoritative body such as the Securities and Exchange Commission or the Public Company Accounting Oversight Board. In those rare circumstances, greater reliance should be placed on the recognized professional competence of the instructor or presenter and the basis for the lack of content review must be documented.</u>
EDMAX Proposal	S5-01. Qualifications of content reviewers. Individuals or teams qualified in the subject matter must review programs. <u>The intent of the review is to serve as a quality control procedure to ensure the course content is accurate and current as well as appropriate for CPE. When it is in rare some circumstances, it may be impractical to review certain programs in advance, such as lectures given only once such as a matter that must be communicated to participants quickly due to the effective date of the matter (for example, an emerging issue, change in accounting/auditing pronouncement or tax code) or the instructor/presenter is the only subject matter expert within the sponsor organization or the instructor/presenter is a recognized leader within an authoritative body such as the Securities and Exchange Commission or the Public Company Accounting Oversight Board, or is generally considered an expert in the program content or subject matter. In those rare circumstances, greater reliance should be placed on the recognized professional competence of the instructor or presenter and the basis for the lack of content review must be documented.</u>
Explanation	Accommodate for other experts other than leader within an authoritative body.

S5-02 – Review responsibilities if content is purchased from another entity	
Current Proposed Change	S5-02. Review responsibilities if content is purchased from another entity. CPE program sponsors may purchase course content from other entities and developers. The organization that issues the certificate of completion under its name to the participants of the program is responsible for compliance with all Standards and other

	<p>CPE requirements.</p> <p>If a CPE program sponsor plans to issue certificates of completion under its name, then the CPE program sponsor must first consider whether the content was purchased from an entity registered with NASBA on the National Registry of CPE Sponsors.</p> <ul style="list-style-type: none"> • If the content is purchased from a sponsor registered with NASBA on the National Registry of CPE Sponsors, then the CPE program sponsor may<u>must</u> maintain the author/developer and content reviewer documentation from that sponsor to satisfy the content development requirements of the Standards. The documentation should be maintained as prescribed in Standard No. 24.
EDMAX Proposal	<p>S5-02. Review responsibilities if content is purchased from another entity. CPE program sponsors may purchase course content from other entities and developers. The organization that issues the certificate of completion under its name to the participants of the program is responsible for compliance with all Standards and other CPE requirements.</p> <p>If a CPE program sponsor plans to issue certificates of completion under its name, then the CPE program sponsor must first consider whether the content was purchased from an entity registered with NASBA on the National Registry of CPE Sponsors.</p> <ul style="list-style-type: none"> • If the content is purchased from a sponsor registered with NASBA on the National Registry of CPE Sponsors, then the CPE program sponsor that issues the certificate of completion under its name <u>may</u>must maintain the author/developer and content reviewer documentation from that sponsor to satisfy the content development requirements of the Standards. The documentation should be maintained as prescribed in Standard No. 24.
Explanation	Clarify responsibility to maintain documentation remains with the entity issuing CPE credits under their NASBA Sponsor Registry approval.

S7-01 –Group Live	
Current Proposed Change	<p>Standard No. 7. Group live programs must employ instructional strategies that clearly define learning objectives, guide the participant through a program of learning, and include elements of engagement within the program.</p> <p>Whether a program is classified as group live or group Internet based is determined by how the participant consumes the learning (in a group setting or on an individual basis)<u>interacts with other participants and the instructor</u> and not by the technology used in program delivery.- Group live examples include but are not limited to:</p> <ul style="list-style-type: none"> • physical <u>physical</u> classroom setting with a real time instructor;; • web enabled two-way video participation; • participation in a group setting and calling into a teleconference;;<u>and or</u> • participation in a group setting and watching a live broadcast or or rebroadcast of a program with a real time subject matter expert facilitator.
EDMAX Proposal	<p>Standard No. 7. Group live programs must employ instructional strategies that clearly define learning objectives, guide the participant through a program of learning, and include elements of engagement within the program.</p> <p>Whether a program is classified as group live or group Internet based is determined by how the participant consumes the learning (in a group setting or on an individual</p>

	<p>basis) <u>interacts with other participants and the instructor</u> and not by the technology used in program delivery.- Group live examples include but are not limited to:</p> <ul style="list-style-type: none"> • <u>physical</u> classroom setting with a real time instructor; • <u>web internet</u> enabled two-way video participation; • participation in a group setting and calling in to a <u>tele</u>conference <u>call</u>; and or • participation in a group setting and watching a <u>live broadcast or</u> rebroadcast of a program with a real time subject matter expert facilitator.
Explanation	“Internet” and “conference call” are more generally accepted terms.

S16-01 –Sponsored learning activities	
Current Proposed Change	<p>Sponsors may round down CPE credits awarded to the nearest one-fifth, one-half, or whole credit at their discretion and as appropriate for the instructional delivery method; however, the CPA claiming CPE credits should refer to respective state board requirements regarding acceptability of one-fifth and one-half CPE credits.</p> <p>Only learning content portions of programs (including pre-program, post-program, and homework assignments, when incorporated into a blended learning program) qualify toward eligible credit amounts. Time for activities outside of actual learning content, including, for example, excessive welcome and introductions, housekeeping instructions, and breaks, is not accepted toward credit. <u>Interactive, facilitated question and answer time between instructor and participants qualifies toward eligible credit amounts.</u></p> <p><u>At their discretion, CPE program sponsors may round down CPE credits awarded for a CPE program to the nearest one-fifth, one-half, or whole credit increment as appropriate for the instructional delivery method. The increment chosen by the CPE program sponsor must be applied to all CPE program sessions (learning activities) within the same CPE program. Any resulting certificate(s) issued for the CPE program must also be awarded in the chosen increment. The CPA claiming the CPE credits should refer to the respective state board requirements regarding acceptability of one-fifth and one-half CPE credits.</u></p>
EDMAX Proposal	<p>Sponsors may round down CPE credits awarded to the nearest one-fifth, one-half, or whole credit at their discretion and as appropriate for the instructional delivery method; however, the CPA claiming CPE credits should refer to respective state board requirements regarding acceptability of one-fifth and one-half CPE credits.</p> <p>Only learning content portions of programs (including pre-program, post-program, and homework assignments, when incorporated into a blended learning program, <u>as well as interactive, facilitated question and answer time between instructor and participants, including closing summary</u>) qualify toward eligible credit amounts. Time for activities outside of actual learning content, including, for example, excessive welcome, <u>and</u> introductions, <u>and</u> housekeeping instructions, and breaks, is not accepted toward credit. Interactive, facilitated question and answer time between instructor and participants qualifies toward eligible credit amounts.</p> <p><u>At their discretion, CPE program sponsors may round down CPE credits awarded for a CPE program to the nearest one-fifth, one-half, or whole credit increment as appropriate for the instructional delivery method. The increment chosen by the CPE program sponsor must be applied to all CPE program sessions (learning activities) within the same CPE program. Any resulting certificate(s) issued for the CPE program must also be awarded in the chosen increment <u>for full credit; however, partial credit</u></u></p>

	<u>must be issued in only one-fifth, one-half, or whole increments. In addition, CPE program sponsors must ensure that the total credit for a CPE program is only in the allowable increment and should round down the credit if necessary. The CPA claiming the CPE credits should refer to the respective state board requirements regarding acceptability of one-fifth and one-half CPE credits.</u>
Explanation	Move statements on what to include in eligible credit amounts to be in one section and restate to exclude excessive housekeeping as well. Provide clarification when awarding credit for partial attendance and to reinforce that total CPE for a program must be in allowable increments.

S16-03 –Monitoring Group Internet Based	
Current Proposed Change	<u>Prior to the commencement of the Internet based program, the CPE program sponsor must communicate how the participants can earn full credit. For example, if polling questions are used for the attendance monitoring mechanism, then the participant must be informed of the number of polling questions posted per CPE credit and how many must be answered or if the questions must be answered correctly in order to earn full CPE credit for the program. For example: “Four polling questions will be posted per 50-minutes of content. You must respond to three out of the four polling questions in order to earn full CPE credit for the 50 minutes of content.”</u>
EDMAX Proposal	<u>Prior to the commencement of the Internet based program, the CPE program sponsor must communicate how the participants can earn full credit. For example, if polling questions are used for the attendance monitoring mechanism, then the participant must should be informed that they must respond to the polling questions and attend for a minimum of “x” minutes in order to earn credit. of the number of polling questions posted per CPE credit and how many must be answered or if the questions must be answered correctly in order to earn full CPE credit for the program. For example: “Four polling questions will be posted per 50-minutes of content. You must respond to three out of the four polling questions in order to earn full CPE credit for the 50 minutes of content.”</u>
Explanation	Avoid being too prescriptive and allow for modification during programs that go longer or shorter and thus required interactions are subject to change.

S16-05 –Web-enabled two-way video	
Current Proposed Change	<u>S16-05 Web enabled two-way video participation of group live programs. In situations where individual participants log into a group live program and are required to enable two-way video to participate in a virtual face-to-face setting, elements of engagement are required in compliance with S7-01 in order to award CPE credits to the participants. Participation in the two-way video conference must be monitored and documented by the instructor or attendance monitor in order to authenticate attendance for program duration. The participant-to-attendance monitor ratio must not exceed 25:1.</u>
EDMAX Proposal	<u>S16-05 Web Internet enabled two-way video participation of group live programs. In situations where individual participants log into a group live program and are required to enable two-way video to participate in a virtual face-to-face setting, elements of engagement are required in compliance with S7-01 in order to award CPE credits to the participants. Participation in the two-way video conference must be monitored and</u>

	<u>documented by the instructor or attendance monitor in order to authenticate attendance for program duration. The participant-to-attendance monitor ratio must not exceed 25:1</u> The participant-to-attendance monitor ratio must be demonstrably reasonable to conclude that participants are on video and engaged throughout the group live program.
Explanation	Avoid being too prescriptive but emphasize importance of participant-to-attendance monitor ratio.

Standard No. 12. CPE program sponsors must provide descriptive materials	
Current Proposed Change	<p>For CPE program sponsors whose courses are purchased or developed for internal training only, CPE program sponsors must make the following information available in advance:</p> <ul style="list-style-type: none"> • Learning objectives • Instructional delivery methods • Recommended CPE credit and recommended field of study • Prerequisites • Advance preparation • Program knowledge level (for optional internal courses only) • Program description (for optional internal course only)
EDMAX Proposal	<p>For CPE program sponsors whose courses are purchased or developed for internal training only, CPE program sponsors must make the following information available in advance:</p> <ul style="list-style-type: none"> • Learning objectives • Instructional delivery methods • Recommended CPE credit and recommended field of study • Prerequisites (if required) • Advance preparation (if required) • Program knowledge level (for optional internal courses only) • Program description (for optional internal course only)
Explanation	Allow for flexibility for mandatory courses and Firm auto-assigned courses.

EDMAX Questions

1. Std 7 - Can the web enabled two-way video participation consist of one or more groups that are on video with an instructor on video as long as the participant-attendance monitor ratio is limited to 25:1, or is it only participants individually on video with an instructor on video?
2. Std. 23 - How are CPE program sponsor contact information and Name of CPE program sponsor representative differentiated?
3. Std 23 - Does the removal of "Verification by CPE program sponsor representative" mean that a signature is no longer required?
4. Std 23 - What type of contact information is required – address only, email, phone number?
5. Std 23-02 – Should we include S16-05 in the first bullet point along with S16-02 and reference internet enabled two-way video conference as applicable?
6. Fields of Study Definitions – please consider the following:
 - Crypto should be included as a subject under Information Technology or Specialized Knowledge.
 - ESG (Pillar 2) should be included as a subject under Taxes.