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**From:**  
**Sent:** Thursday, December 15, 2022 8:54 AM  
**To:** Comments  
**Subject:** (External) Comments Regarding Proposed Revisions to CPE Provider Standards

Good morning and happy holidays!

I will begin by saying the viewpoints and comments expressed in this email are for me alone and do not and should not be considered to reflect those of the firm I am employed at.

That being said, I am our coordinator here at the firm. I would like to provide feedback to the proposed changes to the CPE Provider Standards.

Changes to S5-01 – I believe these changes will add value and clarity to the intent of the qualifications of content reviewers. However, I think it may be more appropriate to separate the portion that reads “In rare circumstance, it may be impractical to review certain programs in advance, such as a matter that must be communicated to participants quickly due to the effective date of the matter...” – this may be better suited to be a leading section. Perhaps renumbering the sections and making this part first would be more prudent. Determination of the need for a content review should likely occur before you determine if you have a qualified content reviewer. Overall though, I do think this change is for the better either way.

Changes to Standard 7 – I concur that the addition of web enabled two-way video participation to group-live instruction programs makes sense. Given that many technologies allow for live presentation and reaction (such as Zoom, Microsoft Teams, and other platforms), it opens the door for group live sessions to be wider, broader and more effective. Further, in the current state of remote work for many individuals within the profession, this option enhances the ability for providers to offer more options to a broader base of participants while not sacrificing the quality of the instruction.

Changes Standard 16 – I concur that the changes do provide clarity. It would have been nice though to allow increments other than one-fifth or one-half (i.e. one-quarter) as sometimes participation may be for 15 minute increments though, in most cases one-fifth and one-half would likely capture the majority of participants.

Changes to S16-03 – Communication of the manner for participants to earn full credit is important. These paragraph, I feel does meet that objective. The example provided is also helpful to understand how the CPE can be earned and communicated.

Addition of S16-05 – This paragraph does provide clarity and gives a better idea of the monitoring requirement for web enabled two-way video presentations. Inclusion of the participant-to-attendance monitor ration is very helpful as will allow providers to determine how many individuals they will need to have present to monitor this requirement. However, larger providers may find the 25-to-1 ratio to be too small because they may have dedicated monitors to their programs. It may be prudent to consider “large providers” and “small providers”. Defining these providers may rest in either the volume of CPE sessions they provide or the size of the presentations they provide. Large providers may be better suited to have a ratio of 50-1 since they are more likely to have dedicated monitors beyond the instructor of the

program. Small providers, the ratio of 25-1 would likely work better because the instructor will be more hands on with the participants and may also be easier able to monitor participant participation.

Changes to S20-01 – This additional clarity on multiple presenters is helpful. Acknowledging that multiple presenters will have hands in preparing CPE worthy content is good for the programs as a whole. Further, it is good to see that multiple presenters can earn the same full additional credit for their efforts as opposed to potentially diminished credit because of multiple presenters being involved.

Changes to S-23-02 – The additional clarity provided by the bulleted list is helpful in ensuring that certificates are properly issued for the program.

Addition of S24-04 – This addition is helpful in clarifying the requirements to retain documentation for the group internet based programs and makes them similar in that regard to group live programs.

Thank you for this opportunity to provide feedback on the proposed revisions to CPE Provider Standards!

Sincerely,

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