



February 22, 2022

Adrienne Harris
Superintendent
New York State Department of Financial Services
One State St.
New York, NY 10004

**PROFESSIONAL
INSURANCE
AGENTS**

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Dear Superintendent Harris:

The sixth amendment to 11 NYCRR 20 added specific course requirements for licensed insurance producers and public adjusters, including specific flood insurance education requirements and an industry-leading diversity, inclusion and elimination of bias requirement. The amendment adding these education requirements applies to licensees who apply for, or renew their licenses, on or after April 1, 2022. The Professional Insurance Agents of New York respectfully requests the New York State Department of Financial Services extend the date licensees must meet these requirements to Jan. 1, 2023, to give continuing-education providers the necessary time to provide quality courses that fulfill the requirements, and adequate time for licensees to complete the credit hours.

A foundational mission of PIANY, a trade association for insurance producers across the state, is to offer high-quality continuing education to all New York State licensees. PIANY seeks to ensure that licensees not only meet the new requirements but really use the opportunity to maximize their education to the best benefit of their clients. Since the finalization of the regulation, PIANY has sought guidance from the department regarding: how licensees should comply with the regulation; the content requirements for compliant courses; and how, as a CE provider, PIANY can best administer its education programs to ensure compliance. However, as the compliance date of April 1 draws closer, no formal guidance has been issued.

Without clarification and guidance from the department, it remains impossible for us to begin offering courses that meet the requirements beginning April 1, 2022. Between the drafting of a course outline, the completion of the course application for credits, the submission of the application fee, and the approval process by the department, it currently takes at least six weeks for a course to become available to licensees. The certain increase in the volume of course approval applications will likely extend that time frame and make it very difficult to offer these courses prior to April 1, 2022.

To provide the necessary time to devise these classes to meet the requirements and to continue to educate producers about the new requirements, PIANY requests the department extend the date licensees must comply to Jan. 1, 2023.

Sincerely,

TIM DEAN, CIC, CRM
PIANY President

cc: Executive Deputy Superintendent for Insurance My Chi
Senate Insurance Chairperson Neil D. Breslin
Assembly Insurance Chairperson Kevin A. Cahill