| | |
|---|---|
| **From:** | Amy Pavia-Zawacki <amy@seaflowerproperty.com> |
| **Sent:** | Thursday, December 03, 2020 1:04 AM |
| **To:** | Stewart, Amy (DBR) |
| **Subject:** | [EXTERNAL] : Real Estate Regulations Posted |

Good Evening,

I wanted to offer my support as a Rhode Island Broker in all of the proposed amendments regarding live online classes.  I am in agreement.

Thank you.


**Amy Pavia-Zawacki,** *Owner*
Operating Broker, REALTOR®
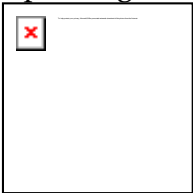


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MA Broker License# 1000335-RE-RB
R.I.C.R.L.B. Firm #42908


---------- Forwarded message ---------
From: **DeLuca, William (DBR)** <William.DeLuca@dbr.ri.gov>
Date: Thu, Nov 5, 2020 at 3:15 PM
Subject: Real Estate Regulations Posted
To:


Please be advised that the Rhode Island Department of Business Regulation is accepting written comments on its proposal to amend 230-RICR-30-20-2 – Real Estate Brokers and Salespersons. These amendments primarily

involve changes to the pre-licensing course requirements to permit remotely delivered instruction and clarify requirements for CE courses taught online.

Written comments should be submitted no later than December 5, 2020 to amy.stewart@dbr.ri.gov or submitted on the on the Secretary of State's rulemaking website under the "Comments" tab. The proposed amended regulation can be accessed by the links in this email or the Department's website.

William J. DeLuca

Administrator Real Estate

**2020 Renewals: Save Time…Renew Online!**

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William.deluca@dbr.ri.gov

| | |
|---|---|
| **From:** | Bob Candon <rwc5900@gmail.com> |
| **Sent:** | Friday, November 06, 2020 9:34 AM |
| **To:** | Stewart, Amy (DBR) |
| **Subject:** | [EXTERNAL] : Proposed regulation change |

Online learning should certainly be permitted and encouraged. Only suggested change: allow taking courses in designated area of sponsoring broker's office. Why not?

Bob Candon B13088 mls 9863

# Stewart, Amy (DBR)

| | |
|---|---|
| **From:** | Rebecca Piltingsrud <rebecca.piltingsrud@theceshop.com> |
| **Sent:** | Friday, December 04, 2020 5:28 PM |
| **To:** | Stewart, Amy (DBR); Rebecca Piltingsrud |
| **Subject:** | [EXTERNAL] : Comment for Proposed Amendment to 230-RICR-30-20-2 – Real Estate Brokers and Salespersons |
| **Attachments:** | Online Versus Live Online Distance Education.pdf |

Thank you for accepting written comments on the proposed amendments to 230-RICR-30-20-2 – Real Estate Brokers and Salespersons.

The CE Shop is an advocate for progress within the real estate compliance education industry. We are a long-time provider of online continuing education in Rhode Island and are involved in real estate regulatory education in all 50 states and Washington D.C, including pre-licensing education in 35 states.

At no time has it been more important than now to provide prospective licensees as well as consumers with high quality education options and removing barriers. While we applaud the proposal to expand the definition of classroom to include "live-virtual" classes, we feel strongly that fully online delivery should be considered for approval in addition to this.

Fully online courses overcome the substantial limitations of live online delivery related to accessibility, quality, and efficacy. The attached document includes details related to the following:

- Fully online delivery provides for substantially greater accessibility and opportunity for completion.
- Fully online delivery provides for greater regulatory controls.
- Fully online delivery provides a more effective higher quality experience for the majority of students.
- Fully online delivery provides measurably more effective results.

Rhode Island is one of only 5 states in the U.S. that does not currently allow for fully online real estate pre-licensing education. While we hope that fully online delivery may be considered as part of the proposed amendment, we also understand if additional steps are required. Please let us know what steps will need to be taken to move forward and how we may be able to serve as a resource.

Sincerely,
Rebecca Pitingsrud

--

**Rebecca Piltingsrud**
Director of Compliance
The CE Shop, Inc.

p. 720.390.3805
e. rebecca.piltingsrud@theceshop.com
w. TheCEShop.com [theceshop.com]

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[youtube.com]

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# Online Education Versus Live Online Distance Education

## Overview

The world has and continues to experience substantial transformation as a result of the ongoing coronavirus pandemic. Real estate education is no exception and distance education has made it possible for individuals to pursue and/or maintain their real estate license even in these unprecedented times.

As of this writing, there are only 5 of the 51 U.S. jurisdictions that still do not allow for fully online (asynchronous) delivery of real estate pre-licensing education (Connecticut, Idaho, New Hampshire, New Jersey, and Rhode Island). Those that do not allow for fully online are already allowing or are at least considering temporarily allowing live online delivery. While live online delivery can be effective and may be an ideal solution for some learners, it presents substantial limitations related to accessibility, quality, and efficacy in ensuring a necessary minimum level of competency for new licensees.

Although both technically considered distance education in most jurisdictions, fully online delivery is substantially different from live online. Fully online courses are also sometimes referred to as on-demand or asynchronous. These courses are self-paced, the student interacts directly with the content, and are typically delivered through a Learning Management System (LMS). Live online courses are also referred to as synchronous, virtual, remote, or webinar. These courses occur at a set date and time and content is delivered by an instructor in much the same fashion as a traditional classroom, typically using teleconferencing software such as Zoom, Microsoft Teams, or Google Hangouts.

This paper outlines the effectiveness and benefits of fully online versus live delivery of real estate pre-licensing education. The paper reviews the key issues that exist across the industry where only live delivery is permitted and how limitations and inadequacies can be minimized or eliminated through the allowance of fully online education as developed by The CE Shop.

# Fully online delivery provides for substantially greater accessibility and opportunity for completion.

Removing barriers and encouraging accessibility by consumers to the real estate industry is critical. Today, individuals wanting to pursue a real estate license in jurisdictions where fully online education is not allowed must complete their education in a classroom or live online setting and are bound to a school's set schedule.

Real estate licensees have historically been second or later career professionals and their transition into the career is often made on a part-time basis. The demands of a current job, raising children and/or tending to the needs of aging parents can make completing a live class very difficult, creating an unnecessary barrier to licensing education and ultimately a license.

Fully online education removes barriers to licensing education and ultimately the ability to obtain a real estate license. Fully online courses can be made available, without discrimination to 100% of the interested consumers. The ability to learn is not limited by either proximity to a classroom or the student's ability to accommodate the schedule of courses. Rather, fully online courses can be taken at any time allowing them to complete their coursework when and where they are able to do so with zero limitation on geography or time.

The abandonment rate for live students may be substantially higher than fully online. Because fully online courses are self-paced and can be taken at any time, the opportunity for students to complete their course are also improved. With live delivery, students may easily fall behind due to tardiness or absenteeism with limited or no opportunity to make up the time, thus having to abandon or significantly postpone their education.

# Fully online delivery provides for greater regulatory controls.

A robust set of nationally recognized standards, processes, and procedures are published by the Association of Real Estate Licensing Law Officials (ARELLO) for fully online course delivery and courses can be certified through their distance education certification program. Equivalent standards, which help ensure effective delivery of content are not currently available for live courses. Program details, including Standards and Policies and Procedures can be accessed at https://www.arello.org/programs/distance-education. Broad examples of controls provided by certification include the following:

- **User authentication**
  Provides regulators with safeguards relative to student identity ensuring course and exam integrity.

- **Instructor qualifications**
  A Certified Distance Education Instructor (CDEI) is required for all fully online certified courses. The CDEI program prepares instructors for facilitating distance education courses.

- **Active learning**
  Progression and demonstration of comprehension through substantial interaction with course content is required. Passive learning is not possible.

- **Progress, time tracking and reporting**
  Active participation and mandatory time in course is controlled and monitored automatically and not dependent upon live classroom monitoring or resource intensive auditing.

- **Required assessment**
  Substantive assessment of comprehension and mastery are required through the use of both sequential and summative assessments. A minimum quantity of questions presented from a pool of questions are required.

Fully online courses provide regulators visibility into the entire curriculum that will be delivered consistently to all students, not simply an outline of the course or a sample presentation that the instructor is planning on using. This substantially reduces the risk of inaccurate or incomplete content being delivered. Similarly, student feedback is delivered consistently, ensuring that every student receives consistent and frequent feedback, as opposed to intermittent feedback for the most active or vocal students in a synchronous course.

The greater level of control that fully online courses provide results in higher levels of consumer protection for regulators and higher levels of success for students.

| Compliance Factors | Live Courses | Fully Online Courses |
|---|---|---|
| Course Application & Review | Outlines & handouts | Entire Curriculum and Student Experience |
| Class Monitoring | Auditing of a small % of courses | Automated progress and participation tracking, mandatory course evaluation for every student |
| Learning certainty | Varies widely, not measurable | 100% mastery is required, every student every time |
| Compliance with mandated hours | Instructor controlled | 100% control over timing |

# Fully online delivery provides a more effective higher quality experience for the majority of students.

The learning efficacy of classroom as compared to distance learning for adult learners was of debate for many years in the late 1990's, however that is no longer a mainstream conversation given the breadth and depth of education at all levels of complexity and length that is now available via distance. For additional reading and scientific data, please see ARELLO/IDECC's guidepost, here http://www.nosignificantdifference.org by Thomas Russel.

With the exception of geographical challenges, live distance courses face the same challenges as the classroom in addition to many other challenges. Let's review some of these challenges.

We've all been in the classroom with great instructors and less than great instructors. Variances in instructor style, personality, mood, experience, teaching tool preferences, etc. can vary the classroom educational experience greatly from very positive to very negative and everywhere in between. The experience is also highly dependent upon the preferences and style of each individual student.

Classroom and live distance education by its very nature, particularly courses with a strict schedule, as in licensing education are essentially a "one size fits all" learning environment. Live education employs a limited learning methodology that consists of material being presented at a predetermined pace, over a specific period of time, periodically interrupted by assessments.

To illustrate the common results of this methodology, students in the "front" of the classroom (actively engaged) are generally keeping up with the instructor and absorbing information but may be bored with the pace and rigor of the course. A more rapid learning environment would suit them better. Students in the "middle" (somewhat engaged) are likely on track, finding the course challenging but effective for them. Students in the "back" (minimally engaged) are either not able to keep up and are missing concepts due to their inability or unwillingness to ask for instructor assistance or are distracted and experiencing minimal comprehension and retention. A highly talented instructor is skilled in reading students and could likely manage this scenario and deliver a mostly positive set of student outcomes. However, this is particularly challenging in a live virtual environment where instructors have substantially less ability to read their students.

Similar to the variances in instructors, peers in a live environment either help or hinder the learning experience. Good instructor control and facilitation of students in the classroom can greatly enhance the learning experience, however that "one" peer who repeatedly either asks questions that are redundant, irrelevant or out of context can greatly distract and detract from the experience of others.

Fully online courses remove these instructor and peer variances while allowing students to interact with course materials at the pace and rigor they require. Instructor support and peer interaction becomes voluntary, not required or disruptive, and course content is delivered consistently and accurately at all times. For the adult learner, they are provided the autonomy to move through the curriculum at their own pace. Adult students require this autonomy which allows them to review concepts without disruption to or by their peers. Learning styles vary greatly. Some adults prefer a traditional, controlled, lecture-based environment while others may prefer self-paced distance education allowing them to read, watch videos, review case studies or engage in interactive games and other learning mechanisms. Fully online courses allow for these preferences and allow students the choice to study and prepare in a way that is most effective for them.

For students enrolling in pre licensing education, they have one primary goal: to pass the state licensing exam! Students must master the material necessary to pass or they will not be successful, a new career is on the line. The live environment as noted earlier is by nature lecture heavy with periodic assessments per regulations. Assessments are effective, however if only periodically given, they cover only a portion of all course materials leaving students inadequately prepared for the licensing exam.

Well-designed fully online courses allow for continued demonstration of mastery. Concepts are presented in multiple ways to appeal to all learner types and preferences. Demonstration of comprehension is required with The CE Shop courses because of our inquiry-first learning methodology. The student MUST demonstrate repeatedly that they have mastered the material in order to move forward in the course, rather than wait for a periodic assessment.

| Learning Factors | Live Courses | Fully Online Courses |
|---|---|---|
| Course materials | Printed materials and handouts, optional by instructor. | Complete curriculum with options to print/bookmark resources, electronic storage and reuse. Electronic testing experience. |
| Instructor & Peers | Variances in style, personality, mood, experience - positive and negative. | 100% consistency in delivery for each student, every student, every time. Wide variety of peer input. |
| Scheduling | Specific time and place, cancels for low enrollment. | 100% on the student's time. |
| Mastery | Depends on knowledge testing tools used by the instructor.. | 100% mastery based, assured mastery upon completion. |

# Fully online delivery provides measurably more effective results.

The CE Shop Pre-Licensing students average substantially higher licensing exam pass rates compared to state averages. Detailed pass rates are published on The CE Shop site at https://www.theceshop.com/pass-rates and highlights are provided below

> Between July 1st 2020 and September 30th 2020, in states that publish pass rate data; the first-time pass rate average for The CE Shop students was 74% vs a state average of 58% on the national portion. For the state portion, The CE Shop students average was 72% vs a state average of 59%.

> In states that do not report pass rates, 91% of The CE Shop students surveyed report having passed their licensing exam, with 75% passing on the first attempt. This is based on 2,698 responses received from February 2016 through September 2020.

Qualitative and quantitative feedback is collected on each and every student and results between January 2020 and October 2020 reflect a 96% referral rating.

## Additional Stakeholder and Industry Considerations

As the real estate industry continues to evolve, so too has the use of technology by licensees. According to the 2020 NAR Member Profile, 96% or REALTORS® reported using a smartphone daily or nearly every day and 70% reported having a website for business use. Logically, real estate education options should evolve along with the industry and asynchronous online delivery is aligned with this.

Fully online learning has grown in popularity over the last decade and is utilized in all levels of education from K-12 to postsecondary and advanced graduate level degree programs. According to the National Center for Education Statistics (Fall 2014) *"Of the 20M students enrolled in degree-granting postsecondary institutions, 28.5% were taking some online courses and 14% taking exclusively online courses"*. Not only are the number of students that are taking advantage of fully online courses growing as is the sophistication of the topics/subjects being delivered. According to Georgetown University's The Economic Value of College Majors report, *"...the most popular online degree programs are within business, healthcare, education and engineering"*. With the ability to pursue an advanced degree in highly technical, consumer facing professions via a distance education environment, the ability to pursue real estate licensing education in such a format should also exist.

Student support services for fully online learning is equally, if not more important than that of live online and is provided by The CE Shop 7 days a week. When students have questions, they can immediately reach the support team via the phone, email or for real-time support, online chat

technology. We've found that students taking distance learning courses prefer to reach out for support electronically and receive communication back in the same manner.

All student support inquiries are handled by the most appropriately skilled and credentialed/approved person on The CE Shop team from front line customer service, technical support, compliance support or instructor support. Having served thousands of students with pre-licensing education across multiple states, our data shows that there are very few student inquiries of any kind and even fewer specific to content related questions.

Attachment: Learning design methodology/science employed by The CE Shop and our LEAP Learning Management System (LMS) that hosts The CE Shop's asynchronous real estate Pre-Licensing courses.

| | |
|---|---|
| **From:** | Rob & Cristina Sousa <rcsousarealtors@gmail.com> |
| **Sent:** | Thursday, November 05, 2020 11:14 PM |
| **To:** | Stewart, Amy (DBR) |
| **Subject:** | [EXTERNAL] : Proposed changes for 230-RICR-30-20-2 |

Hello,

I read through the proposed changes to accommodate virtual learning and absolutely agree with it!
--
Thank you,
Cristina Sousa
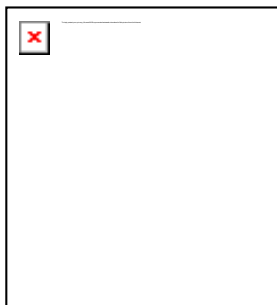


**Cristina Sousa**
REALTOR®, Team Leader
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[google.com]　[facebook.com]　[instagram.com]
[reresourcesri.com]
Check out our blog! [simplifyingthemarket.com]

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|---|---|
| **From:** | Gabe Francis <gabe@rentprov.com> |
| **Sent:** | Thursday, November 05, 2020 3:39 PM |
| **To:** | Stewart, Amy (DBR) |
| **Subject:** | [EXTERNAL] : New proposed changes to the laws |

Amy,

I don't support the new changes.  When I first got my license we used to have to complete 12 hours of continuing education and it was increased to 24 hours.  If a broker or salesperson has an understanding and can successfully complete the course and read the information and complete the necessary testing I don't see why they would have to sit in front of their computer for an extra hour or even two hours just to fulfill a time requirement.  It doesn't make sense to waste someone's time if they have already completed the materials. The new regulation feels like detention and isn't really doing anything to improve the competency of the agents.

That is my two cents.

Have a great day.

Gabriel Francis
Broker/Owner



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Providence RI 02909
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P 401-572-3322
F 888-716-2001

| **From:** | Ian Barnacle <ibarnacle@residentialproperties.com> |
|---|---|
| **Sent:** | Thursday, November 05, 2020 3:19 PM |
| **To:** | Stewart, Amy (DBR) |
| **Subject:** | [EXTERNAL] : proposal to amend 230-RICR-30-20-2 – Real Estate Brokers and Salespersons. |

I support the changes to pre-licensing allowing remotely delivered instruction.
Thank you, Ian


--
Ian Barnacle
Broker/Manager
Residential Properties Ltd.
259 County Road
Barrington, RI 02806
819 Main Road
Westport, MA 02790
Cell 401.487.4110


**Wire fraud warning.** Before wiring any money, recipient of email request is advised to call sender of email to verify identity of sender and authenticity of request.

## Stewart, Amy (DBR)

| | |
|---|---|
| **From:** | jorge jimenez <jjrirealtor@yahoo.com> |
| **Sent:** | Thursday, November 05, 2020 3:09 PM |
| **To:** | Stewart, Amy (DBR) |
| **Subject:** | [EXTERNAL] : Amendments |

Hi . I've been a Realtor for over 10 years and I wish we were able to take the pre lic on line. So yes, I think it's great for newcomers. Jorge Jimenez, Realtor

Sent from Yahoo Mail for iPhone [overview.mail.yahoo.com]

1

| | |
|---|---|
| **From:** | Thomas S. Andolfo <tom.andolfo@verizon.net> |
| **Sent:** | Sunday, November 08, 2020 7:52 AM |
| **To:** | Stewart, Amy (DBR) |
| **Subject:** | [EXTERNAL] : Proposed Amendment - Virtual Classroom Education |

Hello Amy,

As a past Chair of the RI Appraisers Board, I am in favor of the proposed amendment.  Please give Bill my best.  Thanks.

Tom.

Thomas S. Andolfo, MAI, SRA, AI-GRS
President
Andolfo Appraisal Associates, Inc.
216 Weybosset Street, 4th Floor
Providence, RI 02903
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(401) 273-2510 - Fax
tom.andolfo@verizon.net
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1

## Stewart, Amy (DBR)

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| **From:** | Thomas Donovan/USA <Thomas.Donovan@cushwake.com> |
| **Sent:** | Thursday, November 05, 2020 5:15 PM |
| **To:** | Stewart, Amy (DBR) |
| **Subject:** | [EXTERNAL] : 230-RICR-30-20-2 – Real Estate Brokers and Salespersons |
| **Attachments:** | Real Estate Regulations Posted |

Dear Amy,

I am fully in support of the proposed regulation changes.  The use of Live-virtual classrooms is a welcome addition.

**Tom Donovan, CPM®**
Director
Asset Services

Mobile: +1 617-997-5114
Office:  +1 617-204-4156
thomas.donovan@cushwake.com

| | |
|---|---|
| **From:** | Tony Lanni <tonylanniri@gmail.com> |
| **Sent:** | Thursday, November 05, 2020 3:46 PM |
| **To:** | Stewart, Amy (DBR) |
| **Subject:** | Re: [EXTERNAL] : Re: Real Estate Regulations Posted |

Thank you so much for the quick reply. I gleaned it and noticed most of the "redline" changes are around (adding virtual options to) courses. Could you kindly provide a Cliff-Notes version of any pertinent changes?
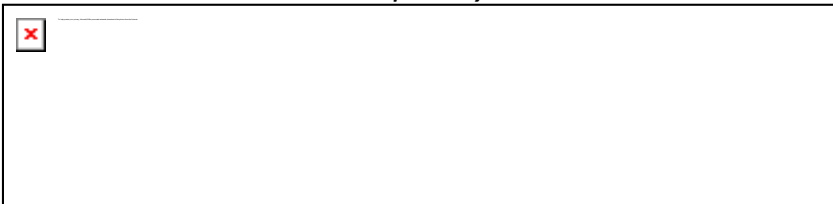
Best Regards,
Tony Lanni, RI & MA
Top Luxury Specialist
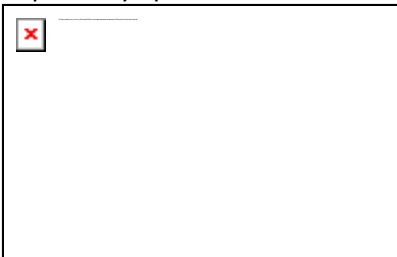


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On Thu, Nov 5, 2020 at 3:37 PM Stewart, Amy (DBR) <Amy.Stewart@dbr.ri.gov> wrote:

> Hi Tony,
>
> You can review the proposed amendments and explanation of the proposed changes here:  https://rules.sos.ri.gov/promulgations/part/230-30-20-2.  Click on the different tabs for various information.  The "Overview" tab contains a written explanation.
>
> Regards,

Amy C. Stewart, Esq.

Deputy Chief of Legal Services

Department of Business Regulation

https://dbr.ri.gov/

**From:** Tony Lanni <tonylanniri@gmail.com>
**Sent:** Thursday, November 5, 2020 3:35 PM
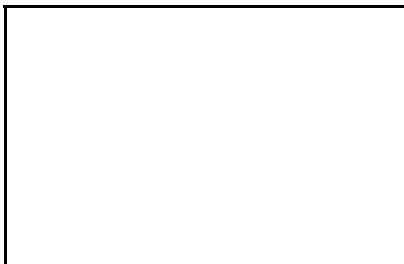**To:** DeLuca, William (DBR) <William.DeLuca@dbr.ri.gov>; Stewart, Amy (DBR) <Amy.Stewart@dbr.ri.gov>
**Subject:** [EXTERNAL] : Re: Real Estate Regulations Posted

Hope all is well with you. What is this about please?

Best Regards,

Tony Lanni, RI & MA

Top Luxury Specialist

**Board Member**

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On Thu, Nov 5, 2020 at 3:15 PM DeLuca, William (DBR) <William.DeLuca@dbr.ri.gov> wrote:

Please be advised that the Rhode Island Department of Business Regulation is accepting written comments on its proposal to amend 230-RICR-30-20-2 – Real Estate Brokers and Salespersons. These amendments primarily involve changes to the pre-licensing course requirements to permit remotely delivered instruction and clarify requirements for CE courses taught online.

Written comments should be submitted no later than December 5, 2020 to amy.stewart@dbr.ri.gov or submitted on the on the Secretary of State's rulemaking website under the "Comments" tab. The proposed amended regulation can be accessed by the links in this email or the Department's website.

William J. DeLuca

Administrator Real Estate

**2020 Renewals: Save Time…Renew Online!**

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William.deluca@dbr.ri.gov

| | |
|---|---|
| **From:** | wendy@rischoolofrealestate.com |
| **Sent:** | Tuesday, November 17, 2020 11:00 AM |
| **To:** | Stewart, Amy (DBR) |
| **Subject:** | [EXTERNAL] : Comments regarding proposed changes to real estate rules |
| **Attachments:** | RuleChangesOverview.pdf |

Attached please find our comments…and some concerns…regarding the proposed rule changes.

Thanks,
Wendy

*Wendy Brown*
Director of Education & Senior Instructor
RI School of Real Estate
12 Watch Hill Road (mailing)
Westerly, RI  02891
401-419-6582 cell

**RI School of Real Estate**

**Comments on Proposed Rule Changes**

**Overview**:

This is adult education. We are committed to providing quality education to the adult learner and have no desire to treat them like they are in high school. We approach our teaching with respect for their life experiences and want to continue to treat our students as the adults they are. We are licensed to teach this course and find that the rules for virtual classes assumes a level of distrust in the very school's that DBR has licensed. We cannot mandate that students focus their full attention to us every minute they are on a computer screen any more than we could in a live classroom. If a student chooses NOT to pay attention, then they don't get the benefit of the instruction whether virtual or live and we cannot make them want to.

We'd also like to see hybrid classes addressed. We need to look ahead to the future and ask ourselves "will there be a demand for some students to be in a live classroom while others want to join virtually"? Recently, Connecticut addressed this and allows for hybrid classes with some very clear guidelines (including a class monitor if the live class has 6 or more students).

**Comments regarding proposed rule changes:**

**2.7 D.2.b** – *Verify each student's identity when they register for the course, at the beginning of each session and during each session.*

Our registration process is done completely online. We have no way of verifying the student's identity other than the fact that their credit card was accepted. Therefore, there is difficulty with the first part of this new rule. We have no problem verifying each student's identity at the beginning of each session and ask them to produce their driver's licenses which we then record. During each session, though, it would be quite cumbersome and time consuming to verify each student's identity. For larger classes of say 50 students, if each student took 15 seconds to show their ID, that would mean a loss of 12 ½ minutes after each break. Our assumption is that no one would attempt to sneak into a virtual class so the purpose of verification during the session is murky. If your concern is that a student would leave the class before it was over, we would know because we are shown the number of participants in the virtual classroom at all times. They, therefore, would be marked absent just as they would in person. We also require that their "video" be on for the entire session and we can "see" whether they are there or not. Again, the random checking of id's seems specious.

In addition, there is a question of the possibility of identity theft. With every student showing their id, it opens the school to significant liability should someone decide to surreptitiously record all the ids when they are shown.

**27. D.2.e** - *Record all course sessions and maintain all recordings for a period of three (3) years.*

There are some technical challenges with this requirement – storage and efficacy. The estimate of necessary storage space for a 45 hour pre license class will require 15 gigabytes each at a minimum. To record and maintain 3 years' worth of recordings will require massive storage. The technological challenge, however, is far greater. In teaching with zoom, we often "share" our screen with our students so that they can see math calculations, graphs, etc. For our visual learners, this is quite important. In order to do this and still be able to see the students, we are using two monitors. However, the recording taking place is only recording the shared screen with no students showing on the recording or just some of the students if using only one screen. If the purpose of the recording is to verify student presence and engagement, this will not work. If the purpose of the recording is to verify the required hours have been met, this can work. It is important to us that we understand the rationale behind the new rule so we can best comply with it. In addition, this is incongruous with the trust the school is given to teach in person.

**2.29. G.6.f** – *For pre licensing courses, the school must submit evidence of compliance with all requirements in 2.7(D) of this Part, including how the school will ensure student attendance and participation during the virtual instruction.*

We are unclear what evidence would be required for renewal and would like this spelled out.

**Conclusion:**

Although we understand the need for verification of identity of students in a virtual classroom just like we required students to sign in in a live classroom, we have objection to the constant verification that seems to be required for virtual classes only. We are capable of knowing if someone isn't present virtually just like if we had someone walk out of a live classroom. Sometimes in the virtual classroom, a student experiences technical difficulties and temporarily drops out but rejoins.

As to participation, even in a live classroom, we don't get 100% engagement and participation. We are being asked to come up with polls, surveys, quizzes with instant verification. We've discovered that some of these exercises require our students to have more than one device in order to be able to participate in them. For the older, more technologically challenged students, this is quite difficult and we find ourselves being the tech adviser as well as the instructor and not getting 100% participation because of that.

Bottom line, we teach, they learn if they want to. If they don't want to, we can't make them because, after all, they are adults making a choice to spend money on instruction that they probably shouldn't have if they are not interested!


Wendy Brown                                          William Fain

Partner and Director of Education          Partner and Senior Instructor