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Sent:	Friday, March 5, 2021 12:12 PM
To:	Campbell, Thomas
Subject:	Comments regarding Rule Development for 61G20-6.002

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Hello Committee Members:

Please reply to this email so I may know it was received.

THANK YOU for considering my TWO comments below regarding your process of rule development.

#1. I see you are planning to substitute the word "internet" with "online".

I see a problem with this.

First, I do not see any type of difference between the two words. They are exact synonyms.

More importantly, since the courses we are talking about directly relate to the construction industry, and since your rules impact the CILB and everybody licensed by the CILB ... I urge you to consider "streamlining" your process to match theirs!

For example ... the CILB's applications have TWO options for course approval - **classroom** ... or ... **distance-learning**.

I believe that "distance-learning" is superior to "internet" and "online". I believe "distance-learning" covers ALL types of classes other than "live". I believe that if you employ the change proposed, you are speaking ONLY to one subset of "distance-learning". If you advance in that direction, you are essentially "banning" all others. How about correspondence courses? Many providers offer those, and many accreditors tell providers to be quiet about it. Why? Let's be more transparent, and more impeccable in our language!

I encourage you to consider how a better approach would be to cover ALL types of classes - hence "distance-learning".

If it is not this way, I will be interested to hear the Committee's opinion regarding "correspondence" courses and where they fit ... or ... if they are being banned - because "correspondence" is neither, "live" nor "online"?

#2. As a provider who has just recently, and for the first time, went through the course accreditation process, I find the requirements extremely confusing.

In your proposed rule changes, you speak about "uploads" and how some providers have only uploaded two or three things ... when the system asks for four or five - I feel like you must be speaking about me because that is exactly what I did! LOL!

But, I completely understand your frustration. As a past Board member myself, I understand what it means to have a vision, on the matter of how applications are to be presented to me ... just to find that they were NOT being presented that way. I get it! Being back on the other side now, I am sensitive to your quandary! So I see that your attempt to modify rules regarding the number of uploads is well intended.

But from my perspective ... I see no difference between your item #i and #iii. How is a syllabus any different than an outline? To me, they are exact synonyms! And what does "course materials" mean? Isn't it redundant to ask for "course materials" and then ask for "objectives" also? The objective is obvious from the materials? ... and what is the purpose of inquiring about "evaluation methods"? Has the Commission or the CILB asked for those evaluations to be forwarded to the Department? I do not see that they have required that. So why ask about it?

I am more confused, than not, by these proposals.

Please consider my suggestions here. I am trying to help you move things forward, for our great State of Florida.

I have been presenting continuing education for over ten years and received exceptionally high evaluations and enjoyed a majority of contractors repeating courses with me. I am licensed by other states and see how some do things differently than Florida.

If you are to stick with your proposal, I would think your instructions should include explanation and examples. Other states do this in their applications. I also think you should clearly state whether you are banning correspondence courses or not?

When I last submitted my course for approval I think I only uploaded two items!

One was the course outline which showed the FBC Chapter #s, Reference #s and title of the topic presented - along with the time spent on that topic. On the same page I included the "objective" of the entire course, saying that it presented updates to the FBC. My Title included the word "Updates". So ... in my opinion, this answers your item #s i, iii, iv, and v - and it did so in one upload.

The other was the actual PowerPoint presentation itself. In my opinion, this answers item # ii.

I do not understand why or how to upload five things, when two covered everything. It seems to me that it is redundant and seems out of sort to me.

I truly hope my comments are well-received and considered. If the Committee is to move forward with a six upload requirement, I am certain that providers will need to know what you want ... or ... you risk getting several uploads that are all the same as each other ... because we are confused about what you are asking for.

Thank you for all the work you are trying to do to make Florida great! I appreciate your service to our state!

I truly hope my comments impact your decision!

May God bless you!

Please remember to reply so that I may know this was received.

THANK YOU ALL!

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