CORRECTIONS PROPOSALS

[vi. A Stabilization and Reintegration Program Boot Camp Discharge Summary, if applicable;]

[vii.] vi. A Therapeutic Community Discharge Plan, if applicable [(attach a copy of the Addiction Severity Index long form)]; and [viii.] vii. (No change in text.)

- 10A:20-4.12 Role of the Division of Programs and Community
 Services, Office of Community Programs, [and Outreach
 Services] and the Residential Community Program
 Notification Committee
- (a) Whenever the inmate to be reviewed has been convicted of an offense enumerated at N.J.S.A. 30:4-91.8, the Residential Community Program Notification Committee shall provide written notice of that review to the prosecutor of the county in which the inmate was convicted or, if the matter was prosecuted by the Attorney General, the written notice shall be provided to the Attorney General:
- 1. The notice shall include the name of the inmate, identifying factors and offense history and shall be timely [faxed] **emailed** and **a hard copy** mailed by the Committee to the county prosecutor or Attorney General to ensure that the county prosecutor or Attorney General shall have 10 business days in which to **contact the victim(s) and** submit comments to the Department of Corrections; and
 - 2. (No change.)
 - (b) (No change.)
- (c) The Director, Office of Community Programs, [and Outreach Services] or designee, may review State-sentenced inmates in adult county correctional facilities for eligibility without submission of an application by the inmate.
- (d) The Office of Community Programs [and Outreach Services] shall assign the inmate to an Assessment and Treatment Center based on the inmate's treatment needs and bed space availability.
- (e) The Office of Community Programs [and Outreach Services] shall prepare the transfer orders necessary for the inmate to be transferred from the correctional facility to the Assessment and Treatment Center.
- (f) The Office of Community Programs [and Outreach Services] shall maintain a waiting list of inmates approved for assignment to the residential community programs.
 - (g) (No change.)
- (h) At the direction of the Commissioner, the Office of Community Programs (OCP) shall have final approval or disapproval authority for the participation of all inmates in residential community programs.
- 10A:20-4.13 Notification of inmate assignment to a residential community program
- (a) After Form 686-I Section II, Authorization for Release of Information has been signed by the inmate, the Office of Community Programs [and Outreach Services] shall forward a copy of all the documents received pursuant to Form 686-II, Community Program Application Checklist with all required documents and supplemental documents to the residential community program to which the inmate has been assigned. The residential community program must handle all inmate documents and classification material with strict confidentiality.
- (b) Pursuant to N.J.S.A. 30:4-91.11, whenever an eligible inmate is authorized for confinement in a residential community program, the correctional facility classification officer shall prepare a summary of all relevant information relating to the inmate's criminal history and background. This information shall include a current face sheet, current progress notes, current photograph of the inmate, and the most recent Pre-Sentence Investigation Report available. The classification officer shall forward the summary of all relevant information to the Office of Community Programs [and Outreach Services].
- (c) The Office of Community Programs [and Outreach Services] shall transmit to the Residential Community Release Program (RCRP), within five business days of the inmate's transfer to the RCRP, the summary of all relevant information relating to the inmate's criminal history and background along with all documentation and supplemental documentation required as referenced in N.J.A.C. 10A:20-4.11. The Office of Substance Abuse Programming and Addiction Services shall be responsible for the transmission of documentation referenced in this

subsection to the [Mutual Agreement Program] provider prior to the transfer of an inmate to the program.

(d) (No change.)

INSURANCE

(a)

DEPARTMENT OF BANKING AND INSURANCE OFFICE OF SOLVENCY REGULATION

Annual Audited Financial Reporting

Proposed Amendments: N.J.A.C. 11:2-26.2, 26.3, 26.4, 26.9, 26.14, and 26.17

Proposed New Rule: N.J.A.C. 11:2-26.15

Authorized By: Marlene Caride, Commissioner, Department of Banking and Insurance.

Authority: N.J.S.A. 17:1-8.1, 17:1-15.e, 17:23-1 et seq., 17:23-20 et seq., and 17B:21-1 et seq.

Calendar Reference: See Summary below for explanation of

exception to calendar requirement. Proposal Number: PRN 2020-016.

Submit comments by April 18, 2020, to:

Denise M. Illes, Chief Office of Regulatory Affairs New Jersey Department of Banking and Insurance 20 West State Street PO Box 325 Trenton, NJ 08625-0325 Fax: (609) 292-0896

Email: legsregs@dobi.nj.gov

The agency proposal follows:

Summary

The Department of Banking and Insurance (Department) proposes amendments and a new rule governing annual financial reporting, codified at N.J.A.C. 11:2-26, to reflect amendments adopted in 2014 by the National Association of Insurance Commissioners (NAIC) to the NAIC Annual Financial Reporting Model Regulation. The NAIC's amendments relate to internal audits by insurance carriers and are required to be adopted by states by January 1, 2020, for state insurance departments to continue to be accredited under the NAIC Financial Regulation Standards and Accreditation Program. Specifically, the NAIC's amendments call for the creation of an "internal audit function" to review and monitor a carrier's operations.

The Department is proposing to amend N.J.A.C. 11:2-26.2 to update the cross-reference to "N.J.A.C. 11:2-26.17" to read "N.J.A.C. 11:2-26.18," to reflect the new cross-reference after recodification of other sections as set forth below.

The Department is proposing to amend N.J.A.C. 11:2-26.3 to add the definition of "internal audit function" to mean "a person or persons that provide independent, objective, and reasonable assurance designed to add value and improve an organization's operations and accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes." The proposed definition tracks the NAIC model.

Similarly, the Department is also proposing to amend the definition of "audit committee" at N.J.A.C. 11:2-26.3 to refer to both "internal" and "external" audits to reflect the NAIC model and the proposed amendments and new rule discussed below and above.

The Department proposes to amend N.J.A.C. 11:2-26.4(a) to update the cross-reference to "N.J.A.C. 11:2-26.17" to read "N.J.A.C. 11:2-26.18," to reflect the new cross-reference after recodification of other sections as set forth below.

The Department proposes to amend N.J.A.C. 11:2-26.9 to update the cross-reference to "section 16 of this subchapter" to "N.J.A.C. 11:2-

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26.17," to reflect the new cross-reference after recodification of other sections as set forth below.

Proposed new N.J.A.C. 11:2-26.14(c) requires that audit committees shall be responsible for overseeing the insurer's internal audit function. The proposed amendment also provides for the granting of suitable authority and resources to the responsible person or persons. The Department proposes to amend recodified N.J.A.C. 11:2-26.14(d), (i), and (j) to update internal cross-references.

Proposed new N.J.A.C. 11:2-26.15 sets forth the requirements of the internal audit function, which provides assurance to the audit committee and insurer management, regarding the insurer's governance, risk management, and internal controls. The proposed new rule provides that the insurer or group of insurers shall establish an internal audit function providing independent, objective, and reasonable assurance to the audit committee and insurer management regarding the insurer's governance, risk management, and internal controls. This assurance shall be provided by performing general and specific audits, reviews, and tests and by employing other techniques deemed necessary to protect assets, evaluate control effectiveness and efficiency, and evaluate compliance with policies and regulations. In order to ensure that internal auditors remain objective, the proposed new rule further provides that the internal audit function shall be organizationally independent. Specifically, the internal audit function shall not defer ultimate judgment on audit matters to others, and shall appoint an individual to head the internal audit function who will have direct and unrestricted access to the board of directors. Organizational independence shall not preclude dual-reporting relationships. Further, the head of the internal audit function shall report to the audit committee regularly, but no less than annually, on the periodic audit plan, factors that may adversely impact the internal audit function's independence or effectiveness, material findings from completed audits, and the appropriateness of corrective actions implemented by management as a result of audit findings. In addition, if an insurer is a member of an insurance holding company system or included in a group of insurers, the proposed new rule provides that the insurer may satisfy the internal audit function requirements set forth therein at the ultimate controlling parent level, an intermediate holding company level, or the individual legal entity level. All of these requirements are derived from the NAIC model.

Proposed new N.J.A.C. 11:2-26.15 also provides exemptions from the application thereof. Specifically, an insurer is exempt from the requirements of the rule if: (1) the insurer has annual direct written and unaffiliated assumed premiums, including international direct and assumed premiums, but excluding premiums reinsured with the Federal Crop Insurance Corporation and Federal Flood Program, of less than \$500,000,000; and (2) if the insurer is a member of a group of insurers, the group has annual direct written and unaffiliated assumed premiums including international direct and assumed premiums, but excluding premiums reinsured with the Federal Crop Insurance Corporation and Federal Flood Program, less than \$1,000,000,000. Notwithstanding the exemption above, an insurer or group of insurers exempt from the requirements of the proposed new rule may determine, but it is not required, to conduct a review of the insurer business type, sources of capital, and other risk factors to determine whether an internal audit function is warranted. Insurers should assess and compare the potential benefits of an internal audit function against the estimated costs. These requirements are similarly based on the NAIC model.

The Department is proposing to amend recodified N.J.A.C. 11:2-26.18(h), to change the cross-reference from N.J.A.C. 11:2-26.16 to 11:2-26.17, to reflect the proper cross-reference of the rule after the proposed recodification. In addition, this rule is proposed to be amended to add a new subsection (j), to provide that carriers are to be in compliance with proposed new N.J.A.C. 11:2-26.15 by January 1, 2020.

A 60-day comment period is provided for this notice of proposal, and, therefore, pursuant to N.J.A.C. 1:30-3.3(a)5, this notice is not subject to the provisions of N.J.A.C. 1:30-3.1 and 3.2 governing rulemaking calendars.

Social Impact

The proposed amendments and new rule will have a positive social impact because they reflect the national standard as adopted by the NAIC

regarding the internal reviews of financial conditions conducted by insurers. The proposed amendments and new rule will improve the State's surveillance of the financial condition of insurers to help ensure that the insurer is in a position to pay claims when due and avoid being in a hazardous financial condition by providing for an independent internal audit function, which will help to ensure that insurance carriers are run properly with effective governance, risk management, and internal controls.

Economic Impact

Insurers will be required to bear any costs associated with complying with the proposed amendments and new rule. These costs involve establishing and maintaining the independent audit function and controls as set forth in the proposed amendments and new rule. Professional services required to comply with the proposal include financial, accounting, and auditing services. The Department believes that the proposed amendments and new rule should not impose undue economic cost to carriers in that insurers should either have in-house professional services or contracted for these services. Moreover, as noted previously, the proposed requirements reflect the national standard adopted by the NAIC and it will be required for the Department to maintain its NAIC accreditation beginning January 1, 2020. Further, insurers with less than a certain level of premiums are exempt from the requirements. The proposed amendments and new rule enhance the Department's surveillance of an insurer's financial condition, so that it is in a position to pay claims when due and avoid being in a hazardous financial condition. Accordingly, the benefits to be achieved by the proposed amendments and new rule as set forth in the Summary and Social Impact above outweigh any costs that may be imposed.

Federal Standards Statement

A Federal standards analysis is not required because the proposed amendments and new rule are not subject to any Federal requirements or standards.

Jobs Impact

The Department does not anticipate that any jobs will be generated or lost due to the proposed amendments and new rule. The Department invites commenters to submit any data or studies concerning the jobs impact of the proposed amendments and new rule together with their comments on other aspects of the notice of proposal.

Agricultural Industry Impact

The proposed amendments and new rule will not have any impact on the agricultural industry in New Jersey.

Regulatory Flexibility Analysis

The proposed amendments and new rule may apply to some "small businesses," as that term is defined in the Regulatory Flexibility Act, N.J.S.A. 52:14B-16 et seg. As explained in the Summary, Social Impact, and Economic Impact statements above, the proposed amendments and new rule require carriers to have an internal audit function that will be performed by one or more persons and provide independent assurance to improve operations and the effectiveness of risk management, control, and the governance processes. The cost of compliance and professional services required to comply with the proposed amendments and new rule are discussed in the Economic Impact statement above. The proposed amendments and new rule do establish some differing compliance or reporting requirements based on business size, by exempting insurers/groups with less than a certain level of premium volume, to provide certain levels of regulatory flexibility for smaller insurers as has been determined appropriate by all insurance regulators through the NAIC's transparent processes. Additional exemptions are not appropriate as this is an NAIC model regulating financial condition monitoring and oversight, and, thus, is required to be adopted by all states to maintain their NAIC accreditation. Therefore, the Department believes that the proposed amendments and new rule should be applied uniformly, and no different compliance requirements are applied based on business size.

Housing Affordability Impact Analysis

The proposed amendments and new rule will not have an impact on housing affordability and are unlikely to evoke a change in the average costs associated with housing in this State in that the proposed INSURANCE PROPOSALS

amendments and new rule relate to an internal audit function of insurance

Smart Growth Development Impact Analysis

The proposed amendments and new rule will not have an impact on smart growth in this State and there is an extreme unlikelihood that the proposed amendments and new rule would evoke a change in housing production in Planning Areas 1 or 2, or within designated centers, under the State Development and Redevelopment Plan in New Jersey in that the proposed amendments and new rule relate to the internal audits of insurance carriers.

Racial and Ethnic Community Criminal Justice and Public Safety Impact

The proposed amendments will have no impact on pretrial detention, sentencing, probation, or parole policies concerning juveniles and adults in the State because the proposed amendments and new rule concern definitions related to insurers' internal audits.

Full text of the proposal follows (additions indicated in boldface **thus**; deletions indicated in brackets [thus]):

SUBCHAPTER 26. ANNUAL FINANCIAL REPORTING

11:2-26.2 Scope

This subchapter shall apply to all insurers transacting business in the State of New Jersey except as provided at N.J.A.C. 11:2-[26.17]**26.18.**

11:2-26.3 Definitions

The following words and terms, when used in this subchapter, shall have the following meanings, unless the context clearly indicates otherwise.

. . .

"Audit committee" means a committee (or equivalent body) established by the board of directors of an entity for the purpose of overseeing the accounting and financial reporting processes of an insurer or group of insurers, **the internal audit function of an insurer or group of insurers, if applicable,** and **external** audits of financial statements of the insurer or group of insurers. The audit committee of any entity that controls a group of insurers may be deemed to be the audit committee for one or more of these controlled insurers solely for the purposes of this subchapter at the election of the controlling person if it meets the requirements of N.J.S.A. 17:27A-4d(5).

"Internal audit function" means a person or persons that provide independent, objective, and reasonable assurance designed to add value and improve an organization's operations and accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes.

. . .

11:2-26.4 Filing of annual audited financial reports; extensions for filing of annual audited financial reports and audit committee appointment

(a) All insurers (unless exempted pursuant to N.J.A.C. 11:2-[26.17]26.18) shall have an annual audit by an independent certified public accountant and shall file an audited financial report with the Commissioner on or before June 1 for the year ended December 31 immediately preceding. The Commissioner may require an insurer to file an audited financial report earlier than June 1 upon 90 days advance written notice to the insurer.

(b)-(d) (No change.)

11:2-26.9 Scope of audit and report

Financial statements furnished pursuant to N.J.A.C. 11:2-26.5 shall be examined by the independent certified public accountant. The audit of the insurer's financial statements shall be conducted in accordance with generally accepted auditing standards. In accordance with Section 319 of the Professional Standards of the AICPA, Consideration of Internal Control in a Financial Statement Audit, the independent certified public accountant should obtain an understanding of internal control sufficient to plan the audit. To the extent required by AU 319, for those insurers

required to file a management's report of internal control over financial reporting pursuant to [section 16 of this subchapter] N.J.A.C. 11:2-26.17, the independent certified public accountant should consider (as that term is defined in Statement on Auditing Standards (SAS) No. 102, Defining Professional Requirements in Statements on Auditing Standards or its replacement) the most recently available report in planning and performing the audit of the statutory financial statements. Consideration shall be given to the procedures illustrated in the Financial Condition Examiner's Handbook promulgated by the National Association of Insurance Commissioners as the independent certified public accountant deems necessary.

11:2-26.14 Requirements for audit committees

(a)-(b) (No change.)

- (c) The audit committee of an insurer or group of insurers shall be responsible for overseeing the insurer's internal audit function and granting the person or persons performing the function suitable authority and resources to fulfill their responsibilities if required by 11:2-26.15.
- [(c)] (d) Each member of the audit committee shall be a member of the board of directors of the insurer or a member of the board of directors of an entity elected pursuant to [(f)] (g) below and the definition of "audit committee" as set forth [in] at N.J.A.C. 11:2-26.3.

Recodify existing (d)-(g) as (e)-(h) (No change in text.)

- [(h)] (i) If an insurer is a member of an insurance holding company system, the reports required by [(g)] (h) above may be provided to the audit committee on an aggregate basis for insurers in the holding company system, provided that any substantial differences among insurers in the system are identified to the audit committee.
- [(i)] (j) The proportion of independent directors, committee members, or audit committee members shall meet or exceed the following criteria:
 - 1.-2. (No change.)
- 3. The provisions of [(i)1] (j)1 and 2 above shall not apply to a domestic insurer if the person controlling the insurer is an entity having a board of directors and committees thereof that substantially meet the requirements of those paragraphs.

11:2-26.15 Internal audit function requirements

- (a) An insurer is exempt from the requirements of this section if:
- 1. The insurer has annual direct written and unaffiliated assumed premiums, including international direct and assumed premiums, but excluding premiums reinsured with the Federal Crop Insurance Corporation and Federal Flood Program, less than \$500,000,000; and
- 2. If the insurer is a member of a group of insurers, the group has annual direct written and unaffiliated assumed premiums, including international direct and assumed premiums, but excluding premiums reinsured with the Federal Crop Insurance Corporation and Federal Flood Program, less than \$1,000,000,000.
- (b) Notwithstanding (a) above, an insurer, or group of insurers, exempt from the requirements of this section may determine, but shall not be required, to conduct a review of the insurer business type, sources of capital, and other risk factors to determine whether an internal audit function is warranted. The potential benefits of an internal audit function should be assessed and compared against the estimated costs.
- (c) The insurer, or group of insurers, shall establish an internal audit function providing independent, objective, and reasonable assurance to the audit committee and insurer management regarding the insurer's governance, risk management, and internal controls. This assurance shall be provided by performing general and specific audits, reviews, and tests and by employing other techniques deemed necessary to protect assets, evaluate control effectiveness and efficiency, and evaluate compliance with policies and regulations.
- (d) In order to ensure that internal auditors remain objective, the internal audit function shall be organizationally independent. Specifically, the internal audit function shall not defer ultimate judgment on audit matters to others, and shall appoint an individual to head the internal audit function who will have direct and unrestricted access to the board of directors. Organizational independence shall not preclude dual-reporting relationships.

PROPOSALS LAW AND PUBLIC SAFETY

(e) The head of the internal audit function shall report to the audit committee regularly, but no less than annually, on the periodic audit plan, factors that may adversely impact the internal audit function's independence or effectiveness, material findings from completed audits, and the appropriateness of corrective actions implemented by management as a result of audit findings.

(f) If an insurer is a member of an insurance holding company system or included in a group of insurers, the insurer may satisfy the internal audit function requirements set forth in this section at the ultimate controlling parent level, an intermediate holding company level, or the individual legal entity level.

Recodify existing N.J.A.C. 11:2-26.15 and 26.16 as 11:2-26.16 and **26.17** (No change in text.)

11:2-[26.17]**26.18** Exemptions and effective dates

(a)-(g) (No change.)

(h) The requirements for management's report of internal control over financial reporting set forth at N.J.A.C. 11:2-[26.16]26.17 are effective beginning with the reporting period ending December 31, 2010 and each year thereafter. An insurer or group of insurers that is not required to file a report because the total written premium is below the threshold and subsequently becomes subject to the reporting requirements shall have two years following the year the threshold is exceeded (but not earlier than December 31, 2010) to file a report. Likewise, an insurer acquired in a business combination shall have two calendar years following the date of acquisition or combination to comply with the reporting requirements.

(i) (No change.)

(j) The requirements for an internal audit function set forth at N.J.A.C. 11:2-26.15 are effective January 1, 2020. If an insurer or group of insurers that is exempt from the N.J.A.C. 11:2-26.15 requirements no longer qualifies for that exemption, it shall have one year after the year the threshold is exceeded to comply with the requirements of that section.

[(i)] (k) (No change in text.)

Recodify existing N.J.A.C. 11:2-26.18 through 26.21 as 11:2-26.19 through 26.22 (No change in text.)

LAW AND PUBLIC SAFETY

(a)

DIVISION OF CONSUMER AFFAIRS STATE BOARD OF PSYCHOLOGICAL EXAMINERS

License Renewal

Proposed Repeals and New Rules: N.J.A.C. 13:42-5.3 and 10.17

Proposed Amendments: N.J.A.C. 13:42-9.3, 10.4, 10.18, and 11.4

Proposed New Rule: N.J.A.C. 13:42-10.18

Authorized By: Board of Psychological Examiners, Indira Nunez, Acting Executive Director.

Authority: N.J.S.A. 45:15BB-11.

Calendar Reference: See Summary below for explanation of exception to calendar requirement. Proposal Number: PRN 2020-014.

Submit comments by April 18, 2020, to:

Indira Nunez, Acting Executive Director Board of Psychological Examiners 124 Halsey Street PO Box 45017

Newark, New Jersey 07101

or electronically at: http://www.njconsumeraffairs.gov/Propo

sals/Pages/default.aspx.

The agency proposal follows:

Summary

N.J.S.A. 45:1-7.1 and 7.4 establish standards for renewing, reinstating, and reactivating licensure. Since 2014, the Board of Psychological Examiners (Board) has had the additional statutory authority to establish standards for issuing licenses to applicants licensed in other states. N.J.S.A. 45:1-7.5 establishes standards for issuing licenses to applicants licensed in other states. The Board proposes amendments, repeals, and new rules to effectuate the provisions of N.J.S.A. 45:1-7.1, 7.4, and 7.5 for psychologists licensed in other states that wish to seek licensure in

Existing N.J.A.C. 13:42-5.3 allows an out-of-State psychologist to take the jurisprudence examination and qualify for licensure in New Jersey if the psychologist is licensed in another state which requires an examination for licensure that the Board has approved and meets all of the other requirements for licensure. Proposed new N.J.A.C. 13:42-5.3 allows the Board to issue a license to an applicant if the Board determines that the state in which the applicant is licensed has standards for licensure that are substantially equivalent to Board standards and the applicant has been practicing for at least two years within the five years prior to applying for a license. An applicant would have to submit documentation from every state in which he or she is currently licensed or was ever licensed indicating that his or her licenses are in good standing. An applicant would also have to undergo a criminal history background check and designate an agent in New Jersey for service of process if he or she will not reside in, or have an office in, New Jersey. The new rule provides standards for determining if a license is in good standing and whether an examination is substantially similar to that required by the Board. The Board would be permitted to revoke a license obtained through fraud, deception, or misrepresentation. An applicant will be required to take a one-time, threecredit continuing education course in New Jersey laws and rules governing the practice of psychology. The Board could grant a license to an applicant whose license was not in good standing due to a pending action, disciplinary proceeding, or criminal charge, as long as the alleged conduct that is the subject of the action, proceeding, or charge was not related to the practice of psychology.

At N.J.A.C. 13:42-10.17, the Board proposes to repeal and replace the section to update it to incorporate license renewal requirements at N.J.S.A. 45:1-7.1, which was effective in January 2014. Under the new rule, the Board would have to send out notices that explain the option to renew as inactive. Licensees would be permitted to renew within 30 days of license expiration by paying a late renewal fee. A licensee who did not renew a license by the end of this 30-day late period would be suspended. A licensee who renews as inactive or whose license has been suspended shall not engage in the practice of psychology. The remaining parts of this section are merely reorganized for clarity.

Proposed new N.J.A.C. 13:42-10.18 addresses reinstatement of licensure and deals with reactivation of licensure pursuant to N.J.S.A. 45:1-7.4. A licensee seeking to reactive a license would be required to submit a renewal application, a certification of employment listing jobs held while the license was inactive, the active renewal fee, and evidence of having completed the continuing education credits required for the current renewal period. The proposed new rule would permit licensees to satisfy continuing education requirements by showing that they completed the requirements of another state in which they were licensed. The proposed new rules would permit the Board to require a licensee to pass an examination, complete a refresher course, or meet any other Board imposed requirement, if the Board determines that there is a reason to conclude that the licensee would not be able to practice safely. The proposed new rule provides criteria for determining if a practice deficiency exists.

Recodified N.J.A.C. 13:42-10.18, is proposed for amendment to indicate that a licensee seeking to reinstate a license would have to submit the current renewal fee and evidence of completing the continuing education credits required for the current renewal period, in addition to the following, as required under the existing rule: a reinstatement application, a certification (rather than an affidavit) of employment listing jobs held during the period a license was suspended, the past due fee from the last renewal period (as opposed to all past delinquent renewal fees), and a reinstatement fee. A licensee could satisfy the new continuing education requirements by showing that he or she completed the