

## Template for comments and secretariat observations

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#	Initials	Line number (e.g., 17)	Comments	Proposed change	Observations of the secretariat
1	AH	IA	I am okay with leaving #3 as is; however, I have given more thought to deleting “adhere to adult learning principles” from this standard. The question was “what do we mean by adult learning principles?” and I’ve come to believe that since there are many, the Provider is responsible for knowing which adult learning principles they are basing their course design on or incorporating into their course design. IACET does not need to specify which framework or model to use but can expect that Providers have selected from known adult learning strategies .	No change needed unless we hear from reviewers about the lack of “adult learning” mentions in the standards	Accept – Adult learning principals is subjective
2	Com m	5	Edit for readability	Add ‘that’ before colon	Accept
3	Com m	5	I am unclear on whether this is optional or a requirement (“intended for organizations who want to demonstrate...”)	Provide more clear language to organization (and in turn Reviewer) as to whether this is a nice to know or need to know.	Noted The scope would not be a requirement. It is to give context for the intended audience.
4	Com m	6	6 and 7 What does this mean?	Define “internationally recognized standard”	Would globally be a better word?  Accept globally
5	DK	6	6&7 This terminology showcases that education has no merit if obtained through real life applications or experiences. For example, with the construction trade in New York, some of the owners and trainers have no formally recognized education but have years of experience in the trade.	the personnel who support it meet the requirements and rigor of an internationally recognized standard or have combined years of experience and prior knowledge of the subject matter.	Reject – This line is simply about meeting the requirements of the standard, not about prior years of experience. Further, the standard is about meeting a degree of education now; regardless of how the experience was earned up to now...
6	DK	8	8&9 Once again, we are only speaking to trained professionals from our community of practice. What about people who add in their own observations and key ideas, who may not have formal	The design, development, delivery, and administrative support of their learning events meet the requirements and rigor of an internationally recognized standard or have combined years of experience and prior knowledge of the subject matter.	Reject – This is consistent with the language of the requirement in the current standard (3.1) <i>The</i>

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			training? I know that some trades work on years of experience to gain an understanding of what makes a work site safe – for example, and will add this an OSHA regulated course. Again, we have many people using OSHA or another body for their curriculum development. Can we add in additional information that they are using an organization predeveloped content? And adding in their own prior knowledge and experiences?		<i>Provider shall have a policy that individuals involved in the design, development, delivery and evaluation of learning events are qualified to perform their assigned tasks.</i>
7	DK	10	The wording is quite high level. Some of our applicants have been asked to do accreditation and may not hold a grade twelve education – nor do we ask them to hold one. However, using words like rigor, excellence and integrity could be complex to unpack and apply to their organization. Also, if someone is an English as a Second Language learner, these words complicate the process of the application. Even doing a quick google search I found that the average American reads at a 7th to 8 <sup>th</sup> grade level. Do you believe that these are words that someone at that level could understand and apply? I think the question is are we asking them to commit to the standards?	Their commitment to education that is accessible, applicable to their workspace and meets the IACET guidelines.	<p>If accepted, I suggest combining this comment/resolution in some way with #9 and deleting the bullet</p> <p>Accept with modification --- ..  <b>rigor of a globally recognized standard and demonstrates a commitment to education that is accessible and applicable to their workplace.</b></p> <p>Regarding the reading level, the standard is meant for the Provider, not the learner. The assumption is that anyone administering the standard would have the appropriate level of comprehension.</p>
8	Com m	10	Organizations should always be continuously improving.	Include how are continuous improvement efforts being applied.	<p>Accept</p> <p>Demonstrate that they are committed to continuous</p>

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					improvement of their learning programs (or something)
9	DK	11	Again, what makes something a quality training activity? Is it someone scenario based? Does it allow them to apply what they have learned? I believe that the word quality could mean something different each person you talk to. What about asking them to complete a training activity that allows the learner an opportunity to demonstrate or share what they have learned? Why are we allowing the instructors to choose or decide what someone has learned? Also, people with neurodifferences can struggle when only one option is provided for assessment.	A learner completing their program and/or learning event has completed a training activity that allows them to demonstrate or share their newfound knowledge which adheres to an internationally recognized standard.	Modified to remove quality – it is redundant
10	Com m	18	Should probably include learner or participant	Definition of “learner”	Accept – need a definition of learner
11	DS	18	18-198 Change definition order so the terms are presented alphabetically. This will make finding a definition easier for the reader.		Accept This is mostly the case. I will move Nondiscrimination policy and IACET CEUs  I recommend keeping IACET Accredited Provider that the top.
12	Com m	19	Edit for readability	Delete “that has” and change demonstrate to demonstrating	Accept
13	DK	20	20&21 Just a suggestion that it could be helpful to provide the explanation of a process based on IACETs view.		Noted: This may be something for the guidance document, but it does not belong in the standard
14	JK	27	Add at end of last sentence, “...by local law or Provider’s internal regulatory requirements.”		Refer to #15
15	Com m	30	Ad many of our applicants are national, even international, recommend a close-ended anti-discrimination statement or changing the statement to define the minimum which the applicant may exceed as required by the location that they are training in.	Place period after ‘disability; Delete ‘or any other characteristic protected by local law.’ Consider adding, Applicant’s policies may exceed this minimum.	Reconcile with #14 Disability. <del>or any other characteristic protected by local law.</del>

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16	Com m	32	Correct to align with normative adult learning nomenclature. All quality instruction should be student-centered. Asynchronous is self-paced. The resources are designed by the CE/T unit, therefore are 'instructional'. This is usually digital, but I understand this could include other modalities so you are trying to keep the door open on that.	Change line to <b>Independent learning using guided practice, digital</b> Instruction using guided practice,	Partially accepted Independent learning that uses...  Not all asynchronous learning is digital in nature.
17	Com m	32	32-34  Asynchronous learning: Student-centered teaching.....	Asynchronous learning: Learner-centered teaching method....	See # 16
18	Com m	36	Again, stepping back to the average reading level. We are choosing words that are common in our community of practice and not directly reflecting some of the organizations who are applying with no previous knowledge or background in adult education. If we choose to use words like this, then I do believe we should provide context or examples. So, say we could also ask them to write out what ways they already assesses (or know that someone is learning) and they could divide them up into the two categories.	Blended learning: a CE/T program (formal or informal) that combines synchronous (scheduled or planned events such as group discussions) and asynchronous (unplanned or unscheduled or could even take place once they are back at work) delivery methods.	Reject – will add definition number next to the terms
				Revisit definition to separate Hybrid vs Blended after public comments. (norina's email)	
19	Com m	45	45-47  Again, it could be helpful to clarify that not all professional development has to be done in a classroom. Perhaps, they have a mentorship program or prior knowledge sharing events?	Continuing education and training (CE/T): learning event(s) in which an adult learner is pursuing additional knowledge, skills, abilities, or capabilities for personal (mentorship/prior knowledge sharing) and/or professional development (paid or free events outside the workplace).	Reject – definition, as is, is to the point. The standard does not state that learning must be in the classroom
20	Com m	45	45-47  ...pursuing additional knowledge, skills, abilities, or capabilities...	...pursuing additional knowledge, skills, abilities (competencies), or capabilities...	Accept
21	Com m	50	50-53  Could we now have a glossary of terms with some breakdown or sharing explanations? Terms like asynchronous/blended/hybrid learning are very adult education community of practice focused.  Also, for inclusive reasons, how are neurodifferences as such ADHD or aspies being factored in? It is scientifically proven that		No Action Clause 3 is the glossary Contact time is an average of the sample learner times, not an attempt to accommodate individual learners.

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			some neurodivergent people need extra time to process. Is this considered allowable time? Or can we build it in?		
22	Com m	53	Collapse all references to text materials, technology, handouts and other instructional elements as ‘instructional resources’. It is confusing to have instructional and learning resources and then also learning resources as categories. ‘Instuctional resources’ is well-understood.	Change learning resources to instructional resources.	Accept change. Additionally, change 3.1.15 to only have instructional resources Delete second sentence, but keep examples
23	MI	60	59 NOTE 1: This definition applies to both synchronous and asynchronous events. Cont 60 hours can be determined on the basis of a pilot study, and then by looking at the 61 average. IACET CEUs should not be awarded for unplanned, unsupervised, or non- 62 sponsored learning activities or for non-countable activities, such as breaks, non- 63 working meals, and anything promotional. “Pilot study” – standard 7.1.4 requires a process, which is more encompassing than a pilot study – it can be a math model, ML or a pilot study as long as the AP can explain themselves. “Pilot study” is an example of a process. Because we are writing definitions, this definition has the indirect impact of limiting the interpretation of the standard. I recommend sticking to language of the standard, and providing optional interpretation within parenthes	Contact hours <b>is</b> determined utilizing the Accredited Provider’s process in standard 7.1.4 (an example can potentially be a pilot study)	Accept modified. Agree that this is meant to be broad and not prescriptive. No parenthesis needed as examples/interpretation can be offered in the guidance document.  <i>This definition applies to both synchronous and asynchronous events. See 7.1.4 for determining contact hours.</i>
24	DS	61	Currently uses “should” but recommend changing to “shall”. “Should” means something is optional but “shall” means it is required.  Providers are not required to award IACET CEUs (as implied by line 354 and in accordance with our discussions during committee meetings and in accordance with current IACET practice) but if they do award IACET CEUs then they do need to adhere to the requirements of line 61.	IACET CEUs <b>shall</b> not be awarded for unplanned...	Noted: “shall” should not be used in a note or a definition as it is an indication of a requirement. Consider adding to clause 7 or to guidance.
25	Com m	61	61-63  Why is a working meal not allowable? Are we saying that a lunch and learn is not a valuable resource in which to share information? For example, I have been to many factories where the only time people had to learn was over lunch. I feel that they are placing unnecessary restrictions on the parameters in which learning can be enjoyed and shared.	I feel that we should open up some of the terminology around allowable.	Reject. “The text is hyphenated. The text says, “Non-working meals,”

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26	Com m	61	Complete thought. Clarify meaning of average.	Change ‘average’ to ‘average instructional time’.	Reconcile with #23 ...Average time of interaction with allowable activities *removed reference to average since “pilot study was removed”
27	Com m	63	Probably should include terms relating to sales	“Promotional or intended for sales only”	Accept
28	MI	65	<p><small>b4 65 66 67</small></p> <p>NOTE 2: One (1) Contact Hour = (Total minutes countable activities – Total minutes non-countable activities)/60 minutes</p> <p>1. The equation as written implies that the left hand side is always 1 hour, while the spirit is that the left hand side is the <b>Total Countable Time in hours</b></p> <p>2. The equation as it reads seems to be deducting non-countable time twice, as it is deducting the non-countable time from the countable – and not from the total contact time</p> <p>I believe that we accurately defined in the prior paragraph:</p> <ul style="list-style-type: none"> <li>* Contact time</li> <li>* Countable time</li> </ul> <p>Then we mixed them up in the equation again – the goal is to find the countable time, which is the total <i>contact</i> time minus the non-countable time</p> <p>i.e. the total contact time with the teacher or in the training environment (countable + non countable) from which we deduct non-countable time</p>	Total Countable Time in hours = (Total Contact Time in minutes – Total non-countable time in minutes) / 60	Reject. The proposed solution is more confusing
29	Com m	68	68-79 I feel that the following words are very high level and could be debated to changed to a more accessible wording: Entity, authorship, tangible, validate, affirming, obsolete	I feel that many of these words are high level and could be a struggle for ESL, low reading level, people with Dyslexia, and others.	Reject The user of this document would be functioning at a level high enough to understand the terms being used and the content of the standard.

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30	MI	78	<p>78, 170, 217 &amp; 247</p> <p>We clearly define the difference between a policy, a process and a procedure.</p> <p>151 3.1.29. <b>Policy:</b> written statement of defined expectations that guide, influence and deter decisions or actions. Policies define scope, roles and/or responsibilities within <b>lea</b> program.</p> <p>152 153 154 155 3.1.30. <b>Procedure:</b> explains the way a certain action is to be performed.</p> <p>156 157 3.1.31. <b>Process:</b> a collection of linked tasks which find their end in the delivery of a service product. A business process has also been defined as a set of activities and tasks t completed, will accomplish an organizational goal.</p> <p>158 159 160 161 NOTE: Processes include what steps are involved, who is responsible for carrying steps, when and how activities will take place and what tools are used.</p> <p>162 ---</p> <p>We initially define several entities as being a <b>process</b></p> <p>77 78 3.1.11. <b>Document control:</b> the <b>Process</b> of addressing how documents are created, approve revised and reapproved, and distributed and how obsolete document use is preven</p> <p>79 80 169 170 3.1.34. <b>Records control:</b> the <b>Process</b> of addressing which and how records are kept, by wh how long, and how they are disposed.</p> <p>171 172 214 215 4.2. IACET authorizes organizations to offer IACET CEUs as an Accredited Provider based o organization's <b>demonstrated processes</b> used to plan, design, develop, deliver, and adr learning events.</p> <p>216 217 218</p> <p>We then ask them to write a policy or a procedure instead of processes in what seems to a mixup of elements.</p>	<p>5.3.2.1. The provider shall have written policies for:</p> <ol style="list-style-type: none"> <li>1. Nondiscrimination</li> <li>2. Intellectual and legal property rights used in training material</li> <li>3. Personnel (Contractors &amp; employees)</li> <li>4. Privacy, confidentiality and security</li> </ol> <p>5.3.2.2 The provider shall have written procedures for:</p> <ol style="list-style-type: none"> <li>1. Awarding IACET CEUs</li> <li>2. Disclosure of conflicts of interests</li> </ol> <p>5.3.2.3 The provider shall have written processes for:</p> <ol style="list-style-type: none"> <li>1. Evaluation of learning event</li> <li>2. Design document</li> <li>3. <b>Needs Analysis</b> (based on 6.1.1.1)</li> <li>4. Internal Audit</li> <li>5. <b>Learner's</b> Records Control</li> <li>6. Document Control</li> </ol>	<p>No action – refer to adjudication of 5.3.2.1 and others to better address</p> <p>Consider in the document, when are we asking for a process vs procedure</p> <p>Action: remove/exchange procedure... add "documented" add note "aka procedure"</p> <p>**Note change to definition for processes. Combined and simplified.</p>

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			<p>247 5.3.2.1. The Provider shall have written policies (and procedures, where applicable) to address</p> <p>248 minimum, the following:</p> <p style="text-align: center;">6</p> <hr/> <p>249 (1) Nondiscrimination</p> <p>250 (2) Awarding IACET CEUs</p> <p>251 (3) Disclosure of conflicts of interest</p> <p>252 (4) Evaluation of learning event</p> <p>253 (5) Design document</p> <p>254 (6) Internal audit</p> <p>255 (7) Intellectual and legal property rights for all materials used in its learning event</p> <p>256 (8) Personnel</p> <p>257 (9) Privacy, confidentiality, and security</p> <p>258 (10) Records control</p> <p>259 (11) Document control</p> <p>260</p> <p>I as well generically recommend getting rid of “at minimum” in all writeup as any standard defines the minimum acceptable compliance. AP’s always have discession in going above and beyond.</p>		
31	Com m	92	It is more clear and more widely understood to reference the resources used during the instructional process as ‘instructional resources’.	Change category to Instructional resources	Accept
32	Com m	97	Add clarity. The instructor should be the person calling the shots with the learning event. If it is asynchronous, facilitate might be better as monitors. To define the process as ‘delivery of information’ is to reduce learning events to the lowest cognitive level. Not sure that is where we want to go to be true to our mission.	Delete ‘who is involved with the facilitation or delivery of information’. Add ‘Person responsible to facilitate, monitor and/or direct instruction for the learning event’.	Reject  Facilitation is broad enough to cover all aspects. Facilitation is active and can include direct instruction. Monitor is more passive observation
33	Com m	103	103-104  The Oxford dictionary provides a powerful and accurate definition that can be adapts to include competencies. ‘By which one increases one’s’ is awkward.	Change to “The acquisition of knowledge, skills, competencies, or abilities through experience, study, or being taught.”	Accept with modification  The acquisition of knowledge, skills, competencies, or abilities



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					through experience, study, or instruction
34	Com m	103	103-104 This is very wordy to me and could be difficult to understand.	The process by which a learner one increases their knowledge, skills, competencies, and abilities through experience, practice, or exercise.	Resolved with #33
35	Com m	106	106 - 110	Consider including Formative and Summative Assessment	For discussion instruments or methods, formative or summative, used...
36	Com m	112	112-114 There are contexts where an accreditor would look for evidence of the quality of the 'softer aspects' of a learning environment to award accreditation, eg., regional public school accreditation. Even then, that is a snapshot at best. We look at concrete variables such as the physical learning space or the LMS to make sure things look functional and are appropriate. 6.1.6.2c is where we assess the quality of the learning environment. We won't be looking at cultural contexts, cultures or even educational approaches when we adjudicate this standard. We will look at the adequacy of facilities and arrangements. Let's keep it simple.	The physical, virtual, or digital environment where the learning event will take place. Includes physical classroom and laboratory spaces, as well as virtual classrooms or LMS platforms.	Accept
37	Com m	116	116-117 I would like to know the definition of 'learning/training <b>course</b> ' since 'learning <b>event</b> ' and 'learning <b>program</b> ' are synonymous. If all the 3 terms mean the same, then 'learning/training <b>course</b> ' ought to be included for completeness of the definition for 'learning event.'		Reject Course is not used in the document
38	DS	118	118-120 I think the font size varies compared to previous sentence in same definition. Believe this happens elsewhere too.	Ensure font size patterns are consistent across document.	accept
39	Com m	125	125-128	LO should be drafted using actionable verb(s) from Bloom's taxonomy	Modified Not intended to be prescriptive

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					(i.e., dictate Bloom's taxomomy)  Learning outcomes must be <b>actionable</b> , observable and/or measurable
40	Com m	127	127-128  The idea that "Learning outcomes must be observable and/or measurable," has always been an issue when doing reviews. I believe that it could be helpful to ask the question "How will you know that the learner has benefited and can apply their new found knowledge and skills?"		No action  Something to consider for the guidance document
41	Com m	130	A Learning Program is defined here as a Learning Event. A Program is typically bigger than an event in my experience. The amalgam of the whole process (eg., ADDIE) surrounding the event would be the program. This seems to pup-up in the new standard in the context of the transfer of a curriculum package	Delete or redefine the context needed.	Look at how learning event vs learning program is used. Can one replace the other or do we need to redefine
42	Com m	132	132-133  Why are we using employed? Why not used?	Change employed to used	See #43
43	Com m	132	132-134  Instructors create instructional resources. Instructional resources are the tools developed by the CE/T provider to support learning. Learners would create learner resources, which might be assistive technology or other tools to support their individual learning needs. Nowhere in the Standard do we assess Learning resources, we assess instruction associated with the Learning Event.	Delete Learning Resource from the glossary. Not needed.	Accept  See 3.1.15 & comment #31  lines 32 and 53 need to be changed to accommodate the lack of a definition.
44	TB	135	Should we provide a definition for Microlearning to the terminology section?	a learning technique that involves bite size lessons to engage learners in the process.	Reject  This has been discussed. Microlearning is relevant only in terms of calculating contact hours. Perhaps something can

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					be included in guidance about bundling microlearning to calculate IACET CEUs
45	Com m	143	Do we honestly need to them that the person has to fulfil a purpose? I feel like we are adding extra words in here.	an individual or individuals employed by an organization	Accept With the note, the context for the document is clear
46	MI	149	149 3.1.28. <b>Pilot study:</b> a test of content, timing and/or technology for a learning event The definition does not contribute to the standard. The only reference is in another definition “Contact Hours” on line 49. Recommending to merge both in line 60  149 & 60	Contact hours can be determined utilizing the Accredited Provider’s process in standard 7.1.4 (example can be a pilot study: a test of content, timing and/or technology for a learning event)	Accept Also see comment #23
47	AH	155	This definition isn’t parallel in structure to others	Procedure: written statement that explains the way a certain action is to be performed	Accept **this definition was removed
48	Com m	164	164-165	Professional development: <b>the pursuit of</b> the knowledge, skills, and abilities to develop or further one’s professionalism, career advancement or personal growth.	No suggested change here - New change by LD
49	Com m	164	Need a better verb here. Use of develop twice is redundant.	Change to “The acquisition of the knowledge, skills, and abilities necessary to further one’s .....	Accept
50	MI	170	170 3.1.34. <b>Records control:</b> the Process of addressing which and how records are kept, by whom, for how long, and how they are disposed. 171 258 259 <b>Records Control</b> appears twice: Once in the definition, and once requiring a written policy. The rest of the standard references learner’s records, with the exception of line #422, and for which I recommended a change.  Thus the spirit of this standard is to require at minimum the management of learner’s records, without the requirement of managing other records for example historical versioning of policies as opposed to providing the most up-to-date version. I	Line 170: <b>Learner’s Records Control:</b> the process of addressing which and how <b>learner</b> records are kept, by whom, for how long, and how they are disposed <b>of</b> . Line 258: (10) Learner’s Records control	Accept

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			<p>agree to that spirit.</p> <p>My recommendation then is to change those words and limit the scope to just learner's records. This will still provide latitude to the AP to implement more complex enterprise record management processes if they need to.</p> <p>170 &amp; 258</p>		
51	JK	173	173-178 Add question marks		Accept
52	Com m	173	<p>173-178, 289-290</p> <p>In the past, Providers have struggled when writing objectives, specifically using verbs that denote measurable objectives.</p>	Perhaps a reference to assist Providers in determining whether an objective is measurable through the use of relevant verbs.	<p>Reject</p> <p>This might be suggested for the guidance document.</p>
53	Com m	190	<p>190-193</p> <p>I feel like we are missing some key people who often contribute to the process. For examples, mentors, supervisors, peers are all forms of support that learners will lean on when they are applying new skills in the workplace. Again, we seem to focus on the management roles but forget the everyday people who are weaved into the learning process.</p>	Support services personnel: Support service staff can be any or all of the following: instructional design and development staff, program evaluators and administrators, event planners, instructors, supervisors, mentors, peers and any personnel that contribute to the creation, delivery and maintenance of the learning event	<p>Reject</p> <p>The list should not be exhaustive as the AP will identify who the support personnel are. Mentor and peers can become a gray area</p> <p>Perhaps modify to say: <i>any personnel that contribute to the creation, delivery and maintenance of the learning event, such as instructional design and development staff, program evaluators and administrators, event planners, subject matter experts, and instructors</i></p>
54	Com m	196	Clarify this is not place dependent	Add "May reference on-site instructor-led or virtual instructor led learning."	<p>Accept</p> <p>Perhaps add as a note</p>
55	Com m	215	Perhaps have a statement or footnote in regard to CEUs as opposed to PDHs.		Reject

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					IACET CEUs is defined in the document. PDHs are not in the scope
56	JK	223	Delete indent		Accept
57	KP	228	Recommend adding 4.2.3. to state that Providers are not required to issue CEUs if they do not see value in doing so. This aligns with 6.1.5.3 line 354 that states “if applicable”	4.2.3 IACET does not require the Provider to issue IACET CEUs to learners who successfully complete their learning events.	Accept with note This has been discussed before. If we add it, we will need a statement that the AP is still required to show CEU calculations Added as 4.2.2
58	TB	247	5.3.2.1 Minor Typo: The <b>Provider</b> shall have written policies (and <b>procedures, were</b> applicable) to address, at a 248 minimum, the following:	Minor Typo: The <b>Provider</b> shall have written policies (and <b>procedures, where</b> applicable) to address, at a 248 minimum, the following:	Accept
59	Com m	247	247-248 ...written policies (and procedures, were applicable)	...written policies (and procedures, where applicable)	Accept
60	Com m	251	Either need to define conflicts of interest in the glossary or eliminate it from the policy list.	Define or delete.	Accept – LD to make suggestion at next meeting - This was put in place to broaden the requirement for disclosing proprietary interests. While I don't feel a definition is necessary, it would not hurt anything...  Do we want to address potential, real and/or perceived (6.1.2.4 a situation in which a person is in a position to derive personal benefit

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					from actions or decisions made in their official capacity.
			Start here on May 15		
61	Com m	253	What is a design document and hat about it needs to be in policy/procedure? Form? Development processes? This needs to be better defined. And to be clear, I think have a policy regarding design processes is key.	Define or delete.	<p>For discussion</p> <p>Include in definitions:</p> <p>Work with KP on this...</p> <p>Ask interpretation subcommittee</p> <p>Ask IACET...</p> <p>Design document or similar documentation</p> <p>Decision – to remove from Standard and recommend to use in guidance – that a design document(s) Typical include include: summary of needs analysis, prerequisites, outline of learning program topics with time estimates for each, learning outcomes, instructional methods and materials, learning assessment methods, and learning styles that are</p>

## Template for comments and secretariat observations

Date: February – March 2023

Document: Draft Standard

Project: IACET CE/T Standards 2023

#	Initials	Line number (e.g., 17)	Comments	Proposed change	Observations of the secretariat
					accommodated (visual, auditory, kinesthetic)
62	Com m	255	Intellectual and legal property rights. What about them is critical to disclose/protect? How does disclosure impact the quality of the process?	Define or delete.	For discussion Make references to clauses.
63	Com m	261	261-262 “Policies (and procedures, where applicable) shall be fair and equitable and comply with all regulatory and statutory requirements and legal obligations that pertain to the Provider.” Processes has been historically used, not procedures. Procedures tends to be the step-by-step directions. Overall, I am very interested to see how the application interprets this particular element.	Policies (and processes, where applicable) shall be fair and equitable and comply with all regulatory and statutory requirements and legal obligations that pertain to the Provider.	Accept
64	Com m	271	Be more specific	The results of <b>each</b> internal audit shall be documented.	Accept
65	Com m	276	The use of 3 <sup>rd</sup> parties to support some aspects of the ‘Program’ is more common. Example might be curriculum materials developed by OSHA and used by CE/T units who do little development, rather implement. Same with some eLearning dev. We see this now and work to verify that there is a feedback loop to the 3 <sup>rd</sup> parties etc. We acknowledged them in the glossary.	Change ‘have personnel’ to ‘employ personnel and/or contractors’	Accept
66	Com m	280	Basically same rationale as 276.		Suggest personnel and/or contractors
67	TB	283	6.1 Minor Typo: <b>Learning event</b> instructional design	Learning event design <b>document or plan</b>	Accept This is not a typo, but changed event to program The event is a component of the overall program
68	AH	286	Don't think we need the word ‘then’ in this sentence	..conducting a formal needs analysis to guide the development...	Accept

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#	Initials	Line number (e.g., 17)	Comments	Proposed change	Observations of the secretariat
69	Com m	289	289-290 Each learning event shall have documented learning outcomes that are specific, measurable, achievable, realistic, and time-based (SMART).	Consider including the sentence “Each learning outcome should be drafted using actionable verb(s) from Bloom’s taxonomy.”	Reject The intent is not to be prescriptive. Reference to Bloom’s taxonomy might go in the guidance document
70	MI	292	291 292 6.1.1.3. The learning event’s learning outcomes shall align with the stated needs from the 293 analysis. 294  299 6.1.2.2. The Provider shall have a Process to ensure a learning event’s instructional me 300 (1) support achieving the learning event’s learning outcomes 301 (2) aligns to documented learners’ needs, and 302 (3) is learner-centered and engaging 303 The minimum requirement for a successful training must be that every need from the needs analysis is covered by at least one learning outcome. The word alignment implies that a certain learning outcome shall have 1-to-1 mapping to the need and may not cover another need from the needs analysis. (292, 301)	6.1.1.3 Each need from the needs analysis shall be fulfilled by one or more learning outcomes.  Line #301: (2) Fulfills documented learners’ needs, and	Modification may be needed however to say each need shall be fulfilled is prescriptive to the AP Reject 1 <sup>st</sup> suggestion For 2 <sup>nd</sup> - “address” documented...
71	TB	292	(also 321) 6.1.1.3 or 6.1.3.2 Should the learning event’s learning outcomes also align with the appropriate level of evaluation (assessment)?		For discussion- Out of scope to determine if assessment method is appropriate to learning outcome... Also, runs the risk of being too prescriptive
72	Com m	302	...(3) is learner-centered and engaging	...(3) is learner-centered and has learner-to-learner interactions  (4) establishes instructor presence through instructor-to-learner interaction	Too prescriptive... Addressing adult learning. Not possible for every course, every topic, every situation/delivery method
73	KP	317	317, 318, 319 As 6.1.3.1 reads, it implies that only assessment methods that are objective, measurable, and documented meet requirements.	6.1.3.1. The Provider shall have a Process to assess achievement of the intended learning outcomes. The Provider shall have at least one of learning assessment method that is	For discussion



## Template for comments and secretariat observations

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#	Initials	Line number (e.g., 17)	Comments	Proposed change	Observations of the secretariat
			There are subjective, non-measured methods that can still be useful, particularly for formative assessment purposes. So these should still be allowed but at least one method must meet be objective, measurable, and documented.	objective, measurable, and documented.	Remove the second sentence...
74	Com m	318	318-319 The learning assessment method(s) shall be objective, measurable, and documented.	Consider including the sentence “Each assessment method should fulfill the principles of validity and reliability.	For discussion – too prescriptive and not appropriate for all circumstances
75	Com m	321	321-323	Consider including the sentence “Evidence collected during assessment should be authentic, valid, sufficient and current (recency).”	For discussion - too prescriptive and not appropriate for all circumstances; asking too much of the reviewer
76	AH	348	Do conflicts of interest need to be communicated in advance of the learning event?	If so, add to bulleted list	For discussion – covered in 6.1.2.4
77	AH	356	Do conflicts of interest need to be communicated during the learning event?	If so, add	For discussion
78	Com m	368	368-369 We want to keep this broad to accommodate the providers who work with clients who do not allow the direct interaction between client employees and the provider. The Provider can still have an evaluation protocol that has the client gather specific evaluation data and provide it back to the Provider. The process needs to be consistent, documented, and piloted.	The <b>Provider</b> shall have a <b>Process</b> for administering and collecting evaluations of <b>learning event(s)</b> . At a minimum, <b>learning event</b> evaluations shall seek <b>feedback</b> on:	For discussion – no action required
79	Com m	371	Instructor competence in subject matter and instructional knowledge/skill	Instructor competence in subject matter and instructional ability (including delivery effectiveness)	For discussion Add new bullet for - delivery effectiveness
80	Com m	371	This needs to be rewritten to accommodate asynchronous learning.	Quality of the delivery of the subject matter	For discussion – see above
81	Com m	373	Expectations?	Extent to which <b>learning event</b> met learning outcomes	Accept “...stated learning outcomes”

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#	Initials	Line number (e.g., 17)	Comments	Proposed change	Observations of the secretariat
82	Com m	376	376-377 ...analyzing learning event evaluation results and sharing relevant data with appropriate CE/T personnel.	...analyzing learning event evaluation results and sharing relevant information with appropriate CE/T personnel.	Accept
83	AH	384	Probably should be consistent with “satisfactorily complete” and “successfully complete”	...identifying learners who successfully complete... (or, if the preference is satisfactory completion then change wording for 7.1.2, 7.1.3	Accept
84	MI	402	402 403 404 (1) IACET CEUs shall be rounded to the nearest hundredth.  The intent here is to allow for microlearning. However, I see two negative issues here:  1. State regulators as well as students will see <b>long</b> trainings being reported in an odd CEUs. Example: 120 hour trainings might have 11.61 CEUs, 45 hours might be 4.54. This will require multiple and repeat explanations  2. Not backward compatible with previous calculations – this will in fact invalidate older CEUs  The proposed change achieves both: Award smaller units for microlearning, and round up in the same way for longer content.	(1) IACET CEUs shall be rounded to the nearest tenth for trainings expected to be 1 or more clock hours, and to the nearest hundredth for trainings expected to be less than 1 clock hour	For discussion – keep this simple. The suggestion will add confusion to the market  Rounding to the nearest hundredth provides a more accurate reflection of time spent
85	Com m	402	Applicants have trouble calculating to the tenths. Even if microcredentials need to be included, are applicants going to go to all the trouble of creating and implementing a learning design document for every 15 – 20 minute or JIT learning event? Suggest adding a statement about bundling shorter (less than 30 minute) learning events.	(1) IACET CEUs shall be rounded to the nearest tenths.	Resolve with comment #84 See comment #44
86	Com m	402	Hundredth?	Should be tenths, e.g., 1.2 IACET CEUs	Resolve with comment #84
87	DS	419	Line currently has a grammar problem. Recommend removing the extra “the” by changing it to match the proposed line.	“Number of IACET CEUs awarded.”	Accept
88	MI	422	422 423 424 7.2.2. The Provider shall have a Process that requires training records to be retained and made available to learners for a minimum of seven (7) years.	The Provider shall have a Process that requires learner’s records to be retained and made available to learners for a minimum of seven (7) years.	Accept

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#	Initials	Line number (e.g., 17)	Comments	Proposed change	Observations of the secretariat
			The standard refers to <b>learner’s records</b> everywhere except in line 422, where it calls it <b>training records</b> . Recommending changing it to learner’s records for consistency		
89	TB	423	Minor typo (extra space in front of the “IACET”		Cannot find this

<b>Ballot results</b>		
<b>Name</b>	<b>Comments (Y/N)</b>	<b>Vote</b>
Dave Schenk	Y	Y
Mohamed Ibrahim	Y	Y
Amy Hasselkus	Y	Y
Kevin Perry	Y	Y
James Ketterer	Y	Y
Tye Beard	Y	Y
Larissa Burbach	N	Y
Mair DeMarco	N	Y
Dan Raudenbush	N	Y
Nick Ercolano	N	Y
Commission	Y	n/a