

# Multistate Examination Guidelines for the Examiner-In-Charge (EIC)

## Pre-Exam Guidelines for the EIC

1. The EIC should provide advance notice to the licensee regarding the planned multistate examination as soon as the examination date is determined. Advance notice should be sent at least four months prior to the start of the examination to allow the licensee the opportunity to reserve time for the examination and to ensure appropriate personnel are available during the examination. Any response from the licensee should be requested within 30 days. (insert hyperlink to Adv Notice Letter)
2. Solidify the participating states. (insert hyperlink to workbook with examiner contacts, exam duties, travel info, etc.)
3. The EIC should send a draft of the Multistate Entry Letter and Information Request to participating states for review approximately 90 days prior to the start of the examination and request a one week turnaround time. All requests to the licensee should be consolidated into a single Information Request. (insert hyperlink to Entry Letter and IR)
4. The EIC should send the Multistate Entry Letter and Information Request to the licensee approximately 60 days prior to the start of the examination and copy all participating states.
5. The EIC should request the licensee submit their response to the Information Request to the EIC approximately 30 days prior to the start date of the examination.
6. The EIC should require the licensee to deliver/upload requested information/documents to a secured shared drive so all participating states can access the requested information/documents.
7. The EIC should review and determine that all requested information/documents have been submitted by the due date and inform participating examiners.
8. If information/documents are not placed on a secured shared drive by the licensee, the EIC should provide them to participating states upon receipt from the licensee.
9. The EIC will be the point of contact for requesting items from the licensee, as applicable, during the examination unless they see necessity for additional points of contact.

10. The EIC should provide a pre-exam memo (*i.e., exam scope dates, onsite dates, licensee contact, licensee products and services, previous findings, etc.*), exam assignments, and work program to participating states within 3 weeks from the start of the on-site examination. Logistical details of the on-site examination (*i.e., business hours, attire, building access, parking, lodging, etc.*) should also be included. Exam assignments and responsibilities should be clearly defined to avoid confusion or misunderstandings.

### **Guidelines for the EIC during the Exam**

1. The EIC should provide the team with guidance at the commencement of the exam on the manner that work papers should be retained and documented in the work program.
2. The EIC should confirm scheduled meetings and meeting times with licensee and clearly communicate them to the exam team.
3. The EIC should “check in” with examiners each day to verify their progress in completing their assigned tasks, answer any questions, get updated on any issues found, and to discuss any violations that might be cited.
4. The EIC should ensure that all requests and responses are documented and tracked (assigning a team member such responsibility) by requestor, requested item, date of request, date of response, and whether response is satisfactory. [\(insert hyperlink to Terry’s tracking spreadsheet\)](#)
5. The EIC should schedule a check-in meeting with the licensee’s exam coordinator and exam team to discuss outstanding request items half-way through exam.
6. The EIC should establish the time frame in which the work program and written findings must be fully completed by each examiner and turned in to be consistent with exam protocols.
7. The EIC should clarify up front which examiner(s) is/are responsible for drafting a section of the ROE (for example the Financial Condition, Compliance, or Management sections) and as needed, should provide guidance to the examiner(s) regarding content, style, and format of the ROE comments. The EIC should also clarify that each examiner is responsible for drafting ROE comments for any multistate finding noted relating to a procedure assigned to the examiner as well as any state specific finding noted by the examiner.
8. The EIC should clearly communicate with the exam team that comments are needed for the exit agenda and when they should be submitted.
9. The EIC should determine who will be discussing what topic during the exit meeting and inform the examiner assigned to that topic.

10. The EIC should schedule a preliminary exit meeting with the licensee for the last day of the on-site examination.

### **Post-Examination Guidelines for the EIC**

1. The EIC should notify participating examiners to submit the completed work program, work papers, and ROE write-ups within a specific time frame after completion of the on- site exam as outlined in the protocols.
2. The EIC should combine work programs and send to participating states.
3. The EIC should schedule an exit conference with the exam team and the licensee.
4. The EIC should write (including incorporating into the ROE any ROE sections, multistate findings, and state specific findings provided by the participating states) and submit the multistate ROE to the reviewing supervisor, allowing enough time to send it to participating states for review and sign off within 30 days after the exit meeting.
5. The EIC should issue the multistate ROE within 60 days of the exit meeting. The licensee should be requested to submit a response within 30 days, and if any extension is requested, may be granted at the discretion of the EIC. [\(insert ROE cover letter hyperlink\)](#)
6. The EIC should issue a copy of the multistate ROE to each of the participating states.
7. The EIC should distribute a copy of the licensee's response to each of the participating states.
8. If the licensee's response to the ROE is acceptable, the EIC should send the Exam Closing Letter to the licensee. [\(insert closing letter hyperlink\)](#)
9. If the licensee's response to the ROE is unsatisfactory, the EIC should continue to follow up with the licensee at regular intervals until resolved. If a timely resolution is not reached, the EIC should refer the matter to their supervisor.
10. The EIC should update NACARA's Regulatory Supervisory Committee (RSC) on a monthly basis regarding the status of the examination until the examination is officially closed.