

IPU RESEARCH NOTE

MICHIGAN STATE UNIVERSITY ■ INSTITUTE OF PUBLIC UTILITIES REGULATORY RESEARCH AND EDUCATION

IPU CONTINUING EDUCATION AND CERTIFICATION SURVEY (2011)

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Background

In February 2011, the Institute of Public Utilities (IPU) at Michigan State University conducted an online survey regarding continuing education and certification of regulators. The results of the survey are presented here, including detailed comments from survey respondents (Attachment 1), the complete survey with responses (Attachment 2), and select findings by respondent characteristics (Attachment 3).

Professional certification has been contemplated from time to time within the regulatory policy community. The issue has arisen recently in part due to concerns about regulatory capacity and qualifications for meeting the complex and dynamic challenges of modern utility policy. IPU's survey was designed to gauge interest in certification among practicing professionals as well as inform the current exploration of the concept by the National Association of Regulatory Utility Commissioners (NARUC). In general, the survey results confirm the value of continuing education to regulation but also raise concerns about barriers, especially funding. The detailed comments reveal a wide diversity of views and opinions among respondents and suggest a cautionary approach.

Methodology

Invitations to participate in the IPU Certification Survey were distributed on February 1, 2011. Survey respondents were identified based on their prior involvement with continuing education programs offered by the Institute. Public-sector and nonprofit organization attendees from the most recent three years (2008-2010) received an electronic invitation to participate in the survey, which was delivered online through *SurveyGizmo*. Current members of the NARUC subcommittees were also invited to participate. The sample is *not* considered representative but rather a relevant group of knowledgeable informants whose opinions are relevant to the certification dialog.

Altogether, 2,056 attendees were identified as potential respondents. Accounting for incorrect contact information and electronic delivery failures, a total of 1,782 individuals received the invitation to participate in the survey. Of these, 241 completed the survey for a response rate of 13.5%.

Background of Survey Respondents

- The survey captured a good mix of regulatory professions, as summarized in Exhibit 1. Attorneys (20%) and accountants (16%) were the two highest respondents, while the "other" category (15%) consisted largely of economists. Consumer or ratepayer advocates, however, accounted for only 3% of the sample.

Exhibit 1. Sample Profile

	N	%
<i>Please tell us about your primary profession (check one):</i>		
Attorney	49	20.4%
Accountant	38	15.8%
Policy analyst	33	13.8%
Financial analyst	28	11.7%
Engineer	27	11.3%
Manager	22	9.2%
Consumer or ratepayer advocate	7	2.9%
Other	36	15.0%
<i>Years of experience at your current agency:</i>		
0-5 years	128	53.1%
6-10 years	32	13.3%
11+ years	81	33.6%
<i>Please indicate the degree(s) you hold:</i>		
BS	104	43.3%
BA	71	29.6%
JD/Law	65	27.1%
MA	42	17.5%
MS	35	14.6%
Ph.D.	9	3.8%
AB	3	1.3%
Other	36	15.0%
<i>Do you have management or supervisory responsibilities at your agency?</i>		
Yes	86	36.1%
No	152	63.9%
<i>Does your profession require you to periodically earn continuing education credits (CLE/CPE/other)?</i>		
Yes	100	41.5%
No	141	58.5%
<i>Are you a member of: (check all that apply):</i>		
NARUC Subcommittees on Law or Administrative Law Judges	5	2.2%
NARUC Subcommittee on Accounting and Finance	14	6.2%
The Society of Utility Regulatory Financial Analysts (SURFA)?	5	2.2%
The Society of Depreciation Professionals	1	0.4%
National Association of State Utility Consumer Advocates (NASUCA)	10	4.4%
Other	54	24.0%
None	145	64.4%

- Of the respondents, 42% indicated they belong to a profession that requires continuing education.
- More than one-third of those in the sample (36%) had management responsibilities.
- The majority of respondents were relatively new to the profession, having served five years or less (53%). Those serving 11 years or more were also well represented (34%).
- About two-thirds of the respondents held an advanced degree. Roughly 34% had obtained a master's degree or advanced professional certification (e.g., CPA), while another 31% held a doctorate degree (mostly juris doctorate).
- A majority of the respondents (64%) did not identify themselves as members of specific NARUC subcommittees or other associations. However, 53% identified NARUC as their primary professional association.

Importance of Continuing Education

- Seventy-four percent (74%) of the respondents attended at least one IPU-MSU educational program, a finding consistent with the sampling method. In addition, 23% of the respondents attended programs conducted by New Mexico State University, while 17% attended other educational programs.
- About 90% of the respondents viewed continuing education as either very important or important for the field of utility regulation.
- Some 86% indicated continuing education was either very important or important to them personally, while 13% indicated it was somewhat important.
- Roughly 80% indicated continuing education was very important or important for developing job-related skills, while 17% indicated it was somewhat important.
- More than half (55%), considered continuing education as very important or important in terms of professional advancement. Twenty-three percent (23%) indicated it was somewhat important, while 17% indicated it was not at all important.
- When considering methods for recognizing continuing education efforts of employees, a "certification of accomplishment" was mentioned most frequently as a possible form of recognition (58%), followed by extra financial compensation (27%) and some form of internal agency recognition (27%). However, 31% indicated no extra recognition was necessary.
- Thirty-five percent (35%) of the respondents said they had experience with online training programs. The types of programs most often mentioned were webinars sponsored by IPU-MSU, the National Regulatory Research Institute (NRRI), and other organizations.

Barriers and Motivations

- Budgetary resource scarcity was the most often cited barrier to participation in educational programs (87%). Other notable obstacles included time commitment (51%), agency approval (28%) and program location (40%).
- External funding to facilitate participation in educational programs would help overcome at least some of these barriers, according to 85% of participants.
- About half (48%) of those surveyed indicated certification would motivate them to participate more frequently in continuing education. However, interest remained high only if employers were viewed as supportive. More than 90% had a high or moderate interest if employers were to pay for training and allow the use of work time. However, that level of interest fell to 32% if individuals were allowed to use work time but pay for the training themselves. If training costs were to fall entirely on the individual with no time allowance, 91% of the respondents indicated little or no interest in pursuing certification.

Certification & Testing

- Seventy-two percent (72%) of the sample said they believed a core set of knowledge could be identified for certification purposes. Of these respondents, 44% said the knowledge should be general and interdisciplinary, 17% indicated it should be specific to a discipline, and 33% indicated it should be relevant to job function.
- Assuming a core set of knowledge is required, 29% said testing should be required to demonstrate mastery. However, 42% did not agree testing should be required and 29% were unsure.
- The book *SmartPower* suggests that accreditation should be required. Of those in the sample, 12% strongly agreed with that argument, 41% agreed, 21% disagreed, and 7% strongly disagreed.
- In terms of who should be subject to certification, 19% felt no one should be required to be certified. Another 19% felt all public commission staff should be subjected to certification. Some respondents also specified that certification should apply to appointed commissioners (45%), elected commissioners (39%), regulatory analysts (36%), executive directors (34%), and regulatory lawyers (34%).
- Based on weighted rankings, survey respondents largely favored a tiered certification program that recognizes cumulative attendance and professional achievement. A traditional university degree program was the least preferred. Three other options (university coursework with exams, non-tiered certificates for cumulative attendance, and certificates of attendance) were about equally supported between these two options.
- IPU-MSU is developing a Certificate of Regulatory Education (CRE) to recognize the commitment of regulatory staff members to continuing professional education (as compared to subject area mastery or professional competency). Seventy-six percent (76%) of respondents indicated they were either very or somewhat interested in this certificate, while 24% had little or no interest.
- In terms of value, a certificate from NARUC was deemed as having the highest value (50%), followed by a university program (44%). Certification by NRRI was valued moderately and the least valued was a professional peer process, to which 29% of respondents assigned a low value.
- Perceptions of regulatory agency willingness to support certification varied. Forty-six percent (46%) felt their commission would pay for tuition, 31% felt their commission would help with testing fees and 35% felt they could secure reimbursement for travel expenses.
- About two-thirds of those surveyed (64%) said they would encourage peers to seek certification, although 28% were unsure.

Value and Testing

- Regarding testing, a majority (77%) indicated there was value in educational programs without testing. A smaller percentage (6%) viewed testing as necessary to give educational programs value, while the remaining 17% were unsure.
- If certification were to include testing, 61% indicated a willingness to participate, but 28% said they were unsure.

Findings by Respondent Characteristics

Survey responses were analyzed by profession, career stage, and education.¹ The distributions, reported in Figures 1 through 8 of Attachment 3, reveal certain tendencies for select questions

Respondents with advanced educational degrees (Ph.D. and J.D.) stand out on several fronts. These individuals were less likely to view continuing education as important to the field of regulation, to themselves personally, or to job skills (Figures 1 through 3). They also tended to disagree with the concept of accreditation (Figure 4) and were less motivated by certification opportunities (Figure 7). With regard to testing, these respondents saw less value in testing (Figure 5) and were less likely to participate in a certification program if testing were required (Figure 6).

With regard to career stage, respondents with 0-5 years or 6-10 years of experience did not vary much in their views toward certification and continuing education. Those with 11+ years of experience, however, appeared less motivated to pursue continuing education and saw little value in participating in certification opportunities (Figure 7), even though they appeared to view continuing education as important to the field at the same levels as their early-career counterparts (Figures 1 and 3).

Attorneys, accountants, and engineers are of particular interest given prevailing requirements for continuing education within their professions. Financial analysts and accountants consistently placed a high value on continuing education, including accreditation (Figures 1-4). Along with engineers, they also indicated that certification would motivate their involvement in continuing education (Figure 7) and they were not dissuaded by testing requirements (Figure 6). By comparison, attorneys tended to express relatively less support for continuing education, accreditation, certification, and testing. Professionals in the “other” category (largely economists) expressed similar views and were somewhat unsure about the skill-building benefits of continuing education (Figure 3). They also indicated less interest in certification if testing were required (Figure 6).

Compared to other groups, managers were much more likely to see value in continuing education for skills development (Figure 3). They also saw value in continuing education without testing to demonstrate mastery (Figure 5). This was reinforced by the emphasis they placed on the importance of continuing education to themselves personally (Figure 2). Managers and those reporting “other” for their profession appeared relatively unsure about the concept of accreditation (Figure 4).

Accountants and managers were the most likely to express interest (very or somewhat interested) in the concept of an IPU Certificate of Regulatory Education (Figure 8). The few consumer advocates in the sample were all interested as well. However, attorneys and engineers were the least interested, consistent with the views about continuing education they expressed throughout the survey.

¹ For education, two-year and four-year degrees were consolidated, as were the various master degrees (e.g., M.A., M.S., and M.P.A. and M.B.A. reported under “other”). Respondents with a C.P.A. were included with the masters degrees. Ph.D.s and J.D.s were combined as well.

Attachment 1 Comments and Suggestions

The following comments were edited lightly to correct typographical or grammatical errors, remove extraneous remarks, and protect the identity of respondents (indicated by *).

1A Comments on the Certificate of Regulatory Education (CRE)

Generally favorable

- It is needed. People need to be motivated to learn more about the regulatory process. Too often they try to skate by with minimal effort.
- Good idea.
- Excellent idea.
- I think it is a great idea.
- It's a good place to start, and perhaps from there other programs could be developed.
- (It) will be a good concept.*
- I think the Certificate of Regulatory Education is a great idea, and can really benefit the utility regulatory field, and could help those planning on relocating to a new state demonstrate proficiency within the field so they would therefore be given better opportunities.*
- Sounds great to me and would encourage state commissions to seriously consider requiring it.
- Great idea. Overdue.
- Good idea as long as it was accepted nationally across all industries and disciplines, i.e., finance, engineering, etc.
- It sounds like a good idea, although, as with the industry (regulatory), it would only be for a small group of people. It would be useful for those new to the industry, in particular commissioners, as good functional training since it seems that most commissions do not really have any for staff either.

Generally unfavorable

- Events move faster in regulation than any academic certification process can follow. Regulation doesn't need certificates, it needs better people.
- As a professional engineer in (*), I have to put in 24 hours of additional education time every two years. Now you are looking at more time to keep my job? You need to get individuals that are working as commission staff not working for the University to start this project. This just looks like money making for the University. Here in (*), the University takes 50% off the top for overhead so my guess it would be the same thing for the CRE. The main problem is that the state commissions can no longer pay the best and brightest.
- It appears to be another revenue generation vehicle for NARUC et al., and a barrier to entry. Those willing to climb the barrier, not necessarily the best candidates for regulation policy, would succeed. The best and brightest will have other options and do they need another reason not to seek public service? Anyone involved in regulation is constantly learning and being exposed to regulation theory and practice. On the job learning is unavoidable and available for those motivated to take advantage of it. Let the cream rise to the top.*
- Seems like a lot of commitment, and earnings for IPU-MSU, but perhaps limited value to the student.
- I believe I max all certifications. Close to retirement and CRE is not needed.*

- Nice to have, but I do not believe that mandatory CRE or any specific certification is necessarily indicative of ability. Board certification of teachers is a prime example. Board certification demonstrates ability to pass the certification test, not to convey knowledge and a love of learning in students.
- I have lengthy experience with professional certification during a previous phase of my career. Specifically, I attended training classes and took the exam to become a certified urban planner (AICP - American Institute of Certified Planners - administered by the American Planning Association). I maintained my certification for 10 years, during which time APA instituted mandatory continuing education to maintain certification. My experience with this process was not favorable. Each year APA increased the cost of annual membership (i.e., dues) but provided less, or lower quality, services. APA maintained a monopoly on continuing education courses by only accrediting classes offered through APA. Clearly, the certification process and the certification maintenance process were only designed to be revenue generators for the organization. Because of this negative experience, I will not participate in any further professional certification processes.
- Certification of a person would not mean that they take reasonable positions in cases or handling of issues.
- I believe that a certificate of attendance serves as an indication of commitment to learning, but little else.
- Broad-based certificates often have little value. I think it is a better use of time and resources to attend on-point, topic-centered trainings and conferences. Speaking as an attorney, another layer of certification would be an impediment to working in this field. I completed ample law school coursework in energy law and regulation, so a broad-based certificate would not be a good use of my time or organization's money.*
- Participation does not demonstrate or indicate mastery. Seems like you're setting the bar too low to be of any significance.*
- A commitment of interest in continuing professional education is insufficiently high to make the CRE beneficial. A higher standard that identifies the recipient as a knowledgeable professional, a more elusive achievement, would be preferable.
- I don't think many people would want/need a license like a CPA that demands continuing education in order to keep the certification (too much work).*

General comments and suggestions

- The necessary core competency varies a lot and is fairly small. Specialized CREs makes more sense. Also changes are very quick. Hard for more formal education to keep up.*
- Make it retroactive.
- Commissioners come through a political process. It is totally inappropriate to imply competence to new commissioners (or the lack) based on whether they have these credentials. As for staff, well, that may be more appropriate.
- The program needs to be online. Funding from DOE would be helpful.
- It would be nice to see some comparison between states' treatment of issues including acquisition adjustment, small vs. large utilities, rate base issues and rate of return.*
- I'm highly ambivalent about creating "silos" between disciplines - core competencies are essential yet not useful if not applicable to one's responsibilities.
- How would past attendance account toward certification? My employer would not pay for me to attend again - nor would I ask my employer to do so.*

- It would be more appealing if it represented (if not mastery) exposure to defined core competencies; counting hours is of little interest.*
- I would be interested if the agency paid, but if I have to pay myself, I would not be able to participate.*
- Twenty or twenty-five years ago this might have been something to pursue. Too close to retirement to even consider doing it now.
- It sounds like this is the future.
- Would this be applicable to engineers, lawyers, accountants, scientists, economists, policy analysts, commissioners, and support staff? Seems difficult to challenge some professions while at the same time make the program achievable for others for general regulatory education, but I will be interested in knowing the areas you seek to certify.
- Utility regulation is rather broad. Staff assigned to water regulation have little interest or need for in-depth study of power issues. Similarly, within power regulation there is specialization. The certification would need to be specific.*
- A bachelor's or master's degree in regulatory economics, accounting, engineering, or law is the best education.
- Budgetary concerns severely limit participation in any continuing education. Prime considerations are cost, location, and subject matter.
- This could be taken as an attempt for your organization to acquire more funding. Don't get me wrong: education and the background necessary to do the job is essential, but creating additional artificial "certifications" could be a waste of time and money, with little gain.
- Until it achieves a level of acceptance within the regulatory community, and specifically within an individual's state, CRE will have very limited utility.
- If increasing certifications would improve staff pay, I believe it would be an incentive. Also, retention problems might be addressed doing this.
- It seems like an interdisciplinary study through university programs, seminars, and workshops would be the preferred approach.
- More training needs to be available about telecommunications.
- It depends on how long it takes to get the CRE. Time constraints are an issue.*
- I'm not interested only because I'm about to retire.
- I would be interested in participating in on-line courses, maybe an hour a day for 3 days in a row, possibly during lunches or maybe 1/2 lunch and 1/2 work time; from 12:30 to 1:30 EST.
- Although developing a CRE would benefit agencies such as the (agency), the biggest obstacle to obtaining those benefits are the (agency)'s budgetary constraints.*
- As someone new to the industry, I am interested in any educational opportunities available for learning the tools most needed for my job. I would be interested in learning more about the CRE and what it would entail.
- Offering a mastery testing option would increase my interest.
- I think the CRE should be a single-tier program. The certificate should be based on hours of attendance and additional requirements based on professional or academic achievement. The proposed first-tier could be called certificate-lite and it simply will water-down the significance of the CRE.
- Budget/travel restrictions are the largest impediment to my participation in continuing education programs.
- Historical program completion prior to the establishment of the CRE should be credited for purposes of obtaining the CRE.

1B Additional Thoughts

Generally favorable

- I think that it is a good way to recognize knowledgeable commission staff.
- It would standardize competency requirements and demonstrate value-added skills levels.
- I think it would be a wonderful thing to have "professional regulators" just like other licensed or certified professionals, but in order to have real value, there would have to be promotional/financial incentives attached to it.
- It would go a long way, at the very least, to give the public the perception of a higher level of knowledge amongst regulators.*
- I like the idea.
- A professional certification process whereby the certification training and testing is conducted by the organization awarding the certification is meaningless and is only a revenue generation source for the organization. In addition, professional certification does not translate into increased compensation for the certified individual, especially for those employed in the public sector. I strongly urge IPU-MSU to rethink their certification concept. However, I'm sure the lure of new revenue will outweigh the opinions of one man.
- Certification, or rather continuing education, might be beneficial if all staff and consumer agencies are exposed to regulatory methods with pros and cons. Not all of them are today.*
- It would be nice to have industry-specific certification (telecom, water, gas, and electric) as well as cross-disciplinary certification.
- Any training or education to better the knowledge of a person is worth the person's time and the company's time.
- I would consider developing a certificate program around already existing programs, with some level of mastery testing required.
- I like the idea. Perhaps you could work with colleges and universities to develop ratemaking as a path to pursue.
- I like it conceptually, but it may be hard to find the time to accomplish it.
- I think the option of certification is a great idea. I personally would probably take advantage of it. However, I do not feel it should be required of commission staff.

Generally unfavorable

- This proposal is ill advised, and states do not have resources to support it. Additionally, it is pregnant with the possibility of abuse.
- I worry that certification slips easily into licensure and sanction. At my agency we rely on credentials for staff to a higher degree than I think is appropriate. It tends to shut out the voices of fully capable people who are not "as" credentialed as others.
- A barrier to entry, but no guarantee of quality nor expertise.
- I have worked with PhD-level employees who lack investigatory skills to properly perform their work. I do not favor required certification because taking classes is no substitute for a curious mind, perseverance, and a desire for fairness for all parties.
- Certification programs denote an effort to objectively identify capable people, but succeed only at identifying people with the ability to obtain the certification. Certification says little about a person's true abilities. You can't test temperament, insightfulness, or savvy. Regulatory agencies also need routine

injections of private sector thought. Certification programs for regulators would be a barrier to such cross-pollination and may keep some of the best people from serving as regulators.*

- Smart Power suggestion regarding mandatory certification is intriguing, but until a program is well-defined with recognized worth, it should be voluntary.
- I think that certification is overused. It doesn't make a difference in the performance or motivation of a professional.
- After 25 years as a regulatory economist, I find that nothing substitutes for relevant university degrees.
- NARUC programs are helpful and educational. However, "theory" and "practice" can be very different - though NARUC programs I've attended have been helpful, my actual work experience has been much more essential in my education. Diversity in commission staffs' backgrounds and expertise is a good thing - in my opinion, the last thing a Commission should want is to make all of its employees get the same certification and education. A degree in a core subject (law, economics, finance, accounting, engineering, etc.) should be required, but a special "regulatory" certification is not necessary. Also, though NARUC is a very helpful resource and does provide value, I think it is common for most of your programs' attendants to not always agree with what you present and suggest - regulation can be somewhat of an "open" field (hard to say there is a "right" answer to every problem) - to require staff to become "certified" and to be told what the "right" answers are to regulatory problems would give NARUC far too much power and influence in my opinion.
- The most interesting and senior speaker at NARUC stated that we (regulators) have created a mass of intertwined and undecipherable guidelines that should just be re-written plainly and we should scrap everything that is in place. I could not agree more. We currently have highly educated people generating more reams of paper and the infrastructure is in a horrible state of decay. Regulation needs people who are not well educated but brilliant, who have hands on knowledge of the workings of utilities. No matter what regulation you write, if the network crumbles, the regulation is useless. Most of the regulation is so ridiculously complex and self serving that it is often misunderstood and costs tens of thousands of dollars to implement or levy. Regulators continue to build this magnificent pyramid of regulation; however, due to the condition of the infrastructure, you are building it on a swamp.*
- I am concerned that NARUC and other agencies might use certification to build a protected niche for themselves and participating professionals. I do not believe certification is efficient, and I do not believe that a certificate is a superior measure of competence.
- A decent supervisor will ensure that staff are provided with the sufficient educational opportunities to excel at the job, and will also ensure that the staff member has mastered the job responsibilities. Additionally, each PUC is different; for example, at small commissions staff must demonstrate mastery of many subject areas, while staff at larger PUCs may be significantly more specialized. It's difficult to envision a certification program that can address these discrepancies and provide value to staff members, rather than simply creating a "hoop" that staff must jump through. The only flaw to this model is that commissioners, whether appointed or elected, fall outside this system and there is no mechanism for ensuring that commissioners have sufficient knowledge of the subject matter.
- There could be "some" benefit to strenuous certification requirements but the nation has a long history of doing well with utility regulation without adding more hoops and hurdles that require time and money. On the job training combined with seeking out needed educational and professional courses is all that is needed. However, elected and appointed decision-makers should have a program of required training they must obtain within 18 months of taking office (perhaps a Camp NARUC type of program--too many do not bother). Moreover, encouraging more training is a much needed positive. Training should not be viewed as not valuable and employers should make time for personnel to get the needed training and should pay for it to the extent it is beneficial to the employee's job performance. That is to

say, if the subject matter is relevant and the course is not overly repetitive for a particular employee, the employer should pay if the funds are available. Continuing education should be valued, seen as a positive--and pretty much made a requirement. Creating new credentialing is not a positive and is not necessary. It could lead to some of the better people being viewed less positively than someone who has the time, money and inclination to attend a lot of continuing education. Get more training and even require it, yes, but set up tiered credentialing, no.*

General comments and suggestions

- Be careful about requiring too many annual CPEs. That will turn off many potential candidates. I am already at 50 hrs / year.
- I would love some type of "masters in utility regulation" program.
- I recommend that you get volunteers from the different state commissions instead of staff to determine if there is really a problem.
- While I am very interested in gaining a certification in regulation, I fear that state budget restrictions would interfere with this right now.
- I also feel that if the certificates are mandatory, then it might take away from their relevancy.
- State budgets make it really hard to travel anywhere, so could the courses be online? Perhaps on a BlackBoard setting?*
- I want to see specific certification on specific areas of interest, i.e., gas, electric, telecom.*
- Our state government has been openly hostile towards public employees, so we would welcome any opportunity to enhance capacity.
- I find the opportunity to obtain certification for those in the regulatory community much more appealing than a requirement to be certified.
- For certification to be credible testing needs to be involved.
- The (Commission) is not interested in sending analysts to NARUC sponsored seminars, workshops or what have you.
- There should be a lengthy but definitive time constraint on finishing the program. Due to a fluctuating work schedule, based on our Commission's docket, course work needs to be either self-paced or offer multiple dates and times.
- The tiered certification may serve as a distinguishing characteristic for regulatory staff.
- Budgets are killing everything
- Due to budget restraints, programs would need to be web-based to avoid travel costs.
- In our state we have a policy that requires developers to contribute water utility facilities when applying for a Certificate of Convenience and Necessity. It is assumed that the developer recovers his investment in the sale of lots. I recently had one of my staff return from water regulation training in NM where he was told that you can't do that. Certification must not manipulate or attempt to control state commission's rights to set policy.
- Any worthwhile certification should demonstrate comprehensive knowledge of the subject matter (an established and wide body of knowledge).*
- Much of what you propose would be most easily implemented by legislation. You should draft model uniform legislation and participate in the National Conference of Commissioners on Uniform State Laws (NCCUSL) to advocate for adoption throughout the 50 United States.
- I would have been more interested in a certification program earlier in my career. Having no more advancement opportunities at my commission and retirement in 6-8 years, certification has little value (other than personal) at this stage of my career.

- I would prefer certification that will take into consideration the amount of experience I have accumulated in working for the Commission for over 20 years.
- I'm interested in continuing education to the extent that it allows me to be more effective in my position, not for a certification.
- I believe this education/training should be offered, not required.
- Consider non-engineer, non-attorney, non-analyst kinds of education opportunities, i.e., rate making 101 for public information officers who must take complicated processes and distill them into 1-page releases the average person in the public can understand. I think there would be an audience for this kind of thing.
- If this could be achieved through on-line training you would surely gain attendance. Also, allowing staffers to attend beginning courses outside of their market would be good; make electric open to water folks.
- Nearing retirement, certification regarding myself is a moot point. If pursued, certification should be based on experience of individual working on job required activities such as rate cases and rate filings. Individuals trained by attending classes and not having participated in real life working conditions (i.e., dockets) are worse than no training at all, i.e., the 90-day wonder scenario.*
- Right now there is no money in most state budgets for travel or training, which has been the case for some time. Therefore, the classes, seminars, etc. that are currently being offered are often not attended even when there is interest and relevance to job duties.*
- Distance learning opportunities should be offered so that those with travel restrictions may still participate and are not disadvantaged.

**Attachment 2
Survey Results**

**SurveyGizmo Summary Report - May 26, 2011
Survey: Institute of Public Utilities Regulator Certification Survey**

Please tell us about your primary profession (check one):

Value	Count	Percent %
Attorney	49	20.4%
Accountant	38	15.8%
Financial Analyst	28	11.7%
Policy Analyst	33	13.8%
Engineer	27	11.3%
Manager	22	9.2%
Consumer or ratepayer advocate	7	2.9%
Other	36	15%

Years of experience at your current agency:

Value	Count	Percent %
0-5 years	128	53.1%
6-10 years	32	13.3%
11+ years	81	33.6%

Please indicate the degree(s) you hold:

Value	Count	Percent %
AB	3	1.3%
BA	71	29.6%
BS	104	43.3%
JD/Law	65	27.1%
MA	42	17.5%
MS	35	14.6%
Ph.D.	9	3.8%
Other	36	15%

Do you have management or supervisory responsibilities at your agency?

Value	Count	Percent %
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Yes	86	36.1%
No	152	63.9%

Does your profession require you to periodically earn continuing education credits (CLE/CPE/other)?

Value	Count	Percent %
Yes	100	41.5%
No	141	58.5%

Are you a member of: (check all that apply)

Value	Count	Percent %
NARUC Subcommittees on Law or Administrative Law Judges	5	2.2%
NARUC Subcommittee on Accounting and Finance	14	6.2%
The Society of Utility Regulatory Financial Analysts (SURFA)?	5	2.2%
The Society of Depreciation Professionals	1	0.4%
National Association of State Utility Consumer Advocates (NASUCA)	10	4.4%
Other	54	24%
None	145	64.4%

Do you identify with National Association of Regulatory Utility Commissioners (NARUC) as your primary professional association?

Value	Count	Percent %
Yes	125	53.4%
No	109	46.6%

If not, is there another group that you primarily identify with?

Value	Count	Percent %
Yes	52	51%
No	50	49%

Have you attended (check all that apply):

Value	Count	Percent %
Annual Regulatory Studies Program ("Camp NARUC") at IPU-MSU	148	68.2%

Advanced Regulatory Studies Program at IPU-MSU	56	25.8%
NARUC Utility Rate School (sponsored by the NARUC Water Committee)	73	33.6%
Programs offered by New Mexico State University (CRI)	49	22.6%
Programs offered by the University of Florida (PURC)	5	2.3%
NARUC Regulatory Law Conference	13	6%
NARUC Accounting Conference	17	7.8%
SURFA Financial Forum	5	2.3%
Other annual educational programs:	36	16.6%
NASUCA Conference	7	3.2%

Have you participated in online training?

Value	Count	Percent %
Yes	82	34.6%
No	155	65.4%

If so, please describe:

Value	Count	Percent %
Yes	69	100%

Should regulatory professionals who engage regularly in continuing education be recognized for their efforts? (check all that may apply)

Value	Count	Percent %
Certificate of accomplishment	135	57.7%
Extra financial compensation	64	27.4%
Internal agency recognition	62	26.5%
No recognition necessary	73	31.2%
Other recognition: _____	15	6.4%

Do you believe that attendance at regulatory education programs has value without testing to demonstrate mastery?

Value	Count	Percent %
Yes	185	77.4%
No	14	5.9%
Unsure	40	16.7%

What are the chief barriers to your participation in existing continuing education programs?
(check all that apply)

Value	Count	Percent %
Time commitment	122	51%
Budgetary resources	209	87.4%
Supervisor approval	31	13%
Agency approval	67	28%
Limited benefits	19	7.9%
Personnel policies	10	4.2%
Location of programs	95	39.7%
None	9	3.8%
Unsure	5	2.1%

Would external funding (e.g., scholarships, stipends) motivate you to participate more frequently in continuing education (that is, beyond your present motivation)?

Value	Count	Percent %
Yes	204	85.4%
No	35	14.6%

Please rate continuing education in terms of its importance in the field of utility regulation:

Value	Count	Percent %
Very important	134	55.8%
Important	83	34.6%
Somewhat important	19	7.9%
Not at all important	1	0.4%
Unsure	3	1.3%

Please rate continuing education in terms of its importance to you personally:

Value	Count	Percent %
Very important	135	56.3%
Important	72	30%
Somewhat important	31	12.9%
Not at all important	2	0.8%

Please rate continuing education in terms of its importance for job-related skills training (e.g., case management, project management, or statistics):

Value	Count	Percent %
Very important	100	42.2%
Important	89	37.6%
Somewhat important	40	16.9%
Not at all important	3	1.3%
Unsure	5	2.1%

Please rate continuing education in terms of the opportunities it offers for your professional advancement or promotion:

Value	Count	Percent %
Very important	64	26.6%
Important	69	28.6%
Somewhat important	55	22.8%
Not at all important	40	16.6%
Unsure	13	5.4%

Do you believe that regulatory staff members require a core set of knowledge that can be identified for the purposes of certification?

Value	Count	Percent %
Yes	172	72%
No	25	10.5%
Unsure	42	17.6%

If yes, core regulatory knowledge should be:

Value	Count	Percent %
General and interdisciplinary	75	43.9%
Specific to a discipline (e.g., law or accounting)	29	17%
Relevant to job function (e.g., rate analyst)	57	33.3%
Unsure	10	5.8%

Assuming that regulation requires a core set of knowledge, do you believe that regulatory staff members should be required to demonstrate "mastery" of that knowledge through testing?

Value	Count	Percent %
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Yes	69	29%
No	99	41.6%
Unsure	70	29.4%

According to the book SmartPower, "Without constraining state policies for appointing regulators or hiring senior staff, state commissioners and senior staff members should be required to gain accreditation following their confirmation." Please indicate your level of agreement with this concept:

Value	Count	Percent %
Strongly agree	29	12.1%
Agree	98	41%
Disagree	50	20.9%
Strongly disagree	16	6.7%
Unsure	46	19.2%

Which officials, if any, should be subject to a certification process? (check all that apply)

Value	Count	Percent %
Elected commissioners	93	39.2%
Appointed commissioners	106	44.7%
Executive / administrative director	81	34.2%
Regulatory lawyers	80	33.8%
Regulatory analysts	85	35.9%
All public commission staff	46	19.4%
None	44	18.6%
Unsure	40	16.9%

Please rank, one through five with one being the most preferred, the following certification models in terms of their appeal to you personally (time and resources permitting):

Item	Total Score ¹	Overall Rank
A tiered certification program that recognizes cumulative attendance, as well as professional achievement (such as papers and teaching)	717	1
A certificate that recognizes cumulative attendance across multiple programs	650	2
A certificate of attendance for continuing education programs	646	3

A university department certificate program that requires coursework and examinations 629 4

A traditional university degree program 476 5

Total Respondents:

¹ Score is a weighted calculation. Items ranked first are valued higher than the following ranks, the score is the sum of all weighted rank counts.

Please indicate the value of certification from the following organizations: (please check one box per row)

	Low	Moderate	High	Total
National Association of Regulatory Utility Commissioners (NARUC)	13.4% 31	36.4% 84	50.2% 116	100% 231
National Regulatory Research Institute (NRRI)	22.0% 50	45.4% 103	32.6% 74	100% 227
One or more of the university educational centers	13.5% 31	42.8% 98	43.7% 100	100% 229
Members of an association or committee of professional peers	29.3% 66	49.8% 112	20.9% 47	100% 225

Would certification opportunities motivate you to participate more frequently in continuing education (that is, beyond your present motivation)?

Value	Count	Percent %
Yes	112	47.9%
No	71	30.3%
Unsure	51	21.8%

Please indicate your level of interest in certification if: (please check one box per row)

	None	Low	Moderate	High	Total
Your employer pays and allows you to use work time	3.0% 7	6.0% 14	20.0% 47	71.1% 167	100% 235
You pay personally but your employee allows you to use work time	24.3% 57	43.4% 102	26.0% 61	6.4% 15	100% 235
You must pay personally and pursue on your own time	53.4% 125	38.0% 89	7.3% 17	1.3% 3	100% 234

Do you believe your commission would support certification by paying for: (please check one box per row)

	Yes	No	Unsure	Total
Tuition or registration fees	45.7% 107	19.2% 45	35.0% 82	100% 234
Testing fees	30.9% 72	22.7% 53	46.4% 108	100% 233
Travel costs	34.9% 81	23.7% 55	41.4% 96	100% 232

Would you encourage subordinates or peers to seek certification?

Value	Count	Percent %
Yes	148	63.8%
No	20	8.6%
Unsure	64	27.6%

Would you participate in a certification program if it required testing to demonstrate mastery?

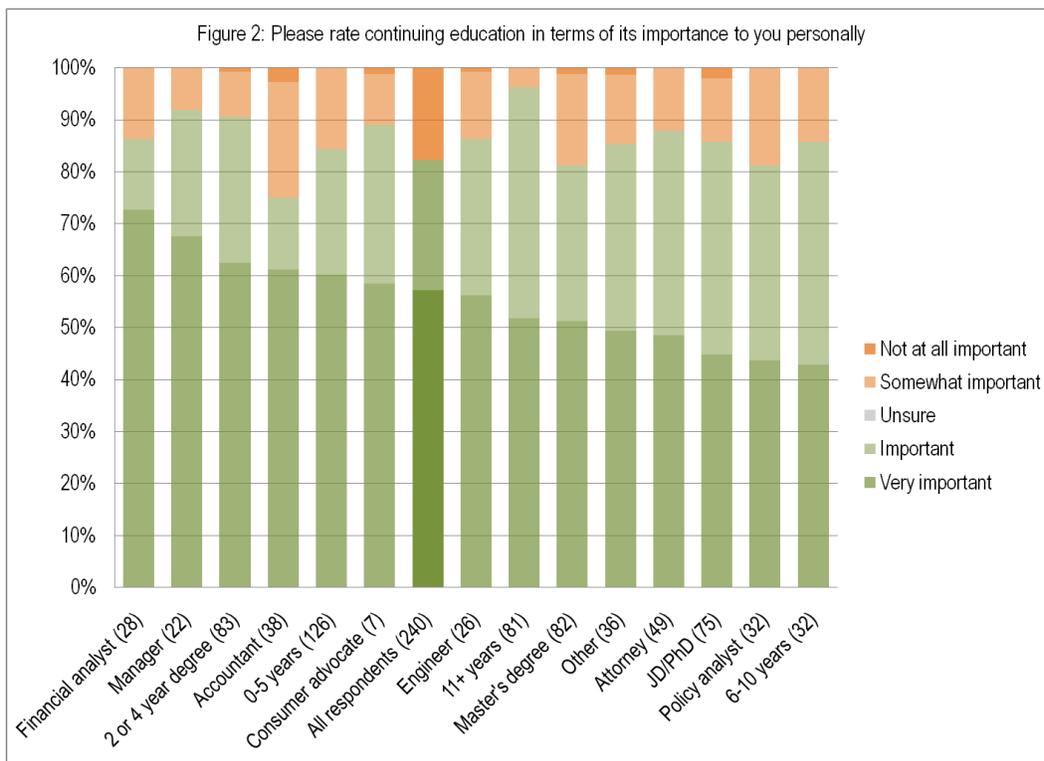
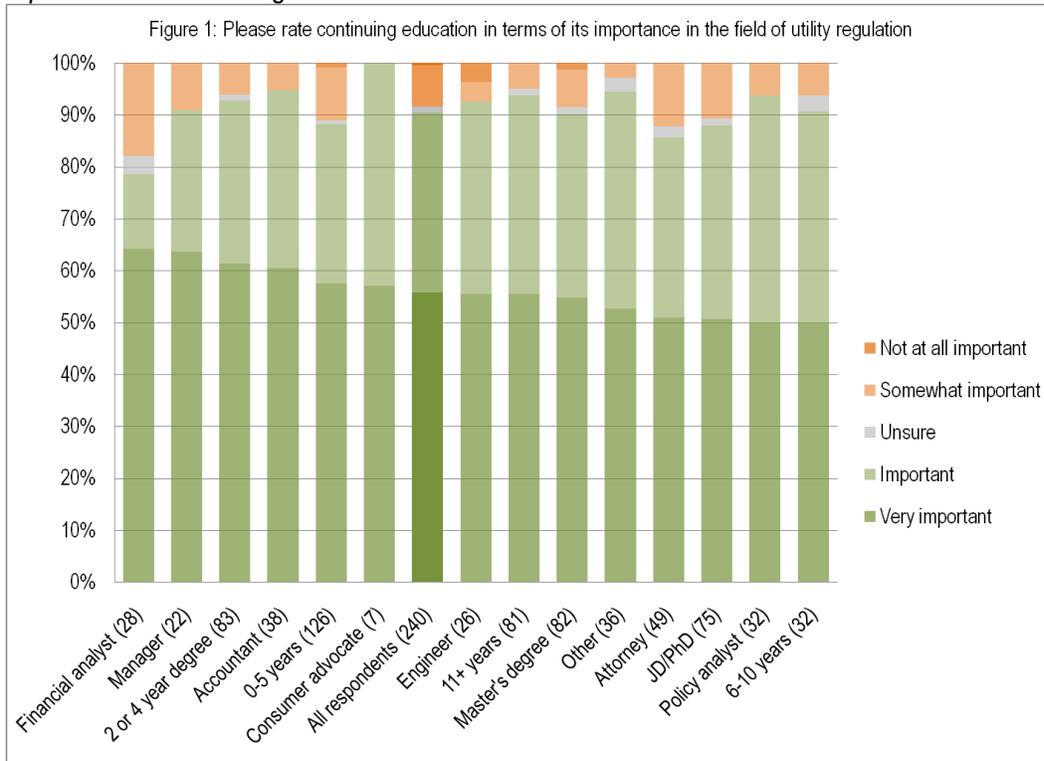
Value	Count	Percent %
Yes	142	60.9%
No	25	10.7%
Unsure	66	28.3%

IPU-MSU is developing a Certificate of Regulatory Education (CRE) to recognize the commitment of regulatory staff members to continuing professional education (as compared to subject area mastery or professional competency). Existing educational programs already offer certificates for program completion and the CRE would build on this established practice by explicitly recognizing cumulative participation in university-sponsored educational programs. The first-tier certificate would be based on hours of attendance and a second-tier would involve additional requirements based on professional or academic achievement (e.g., accredited coursework or peer-reviewed papers). Please indicate your interest in participating in this program:

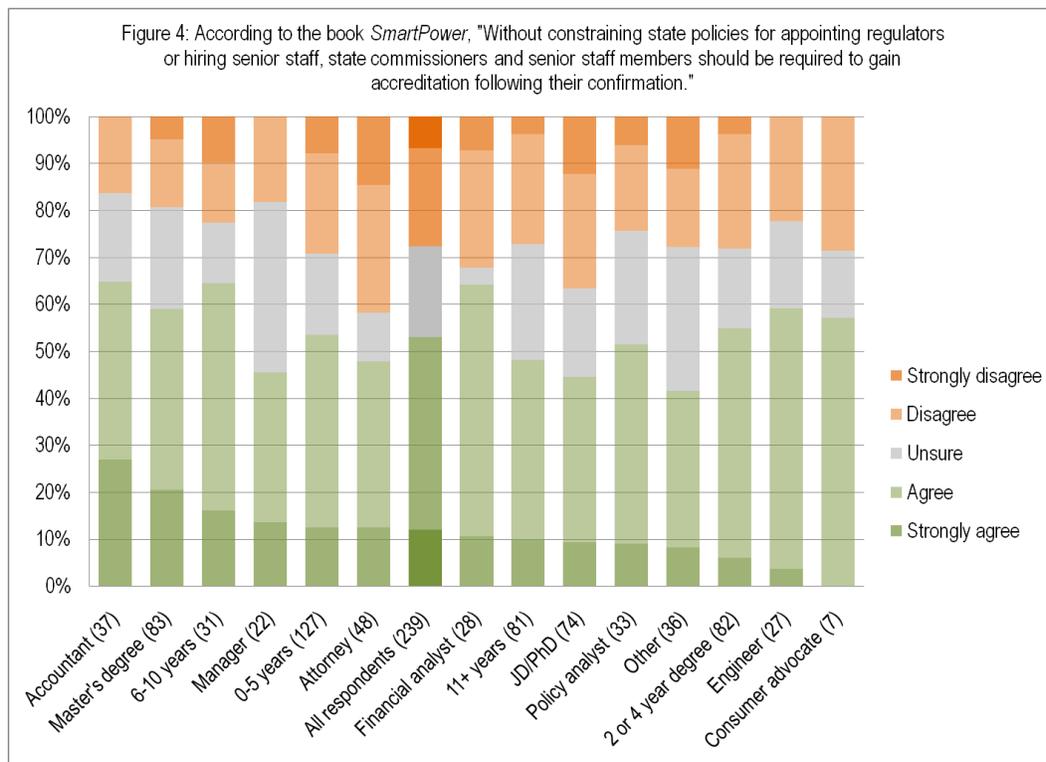
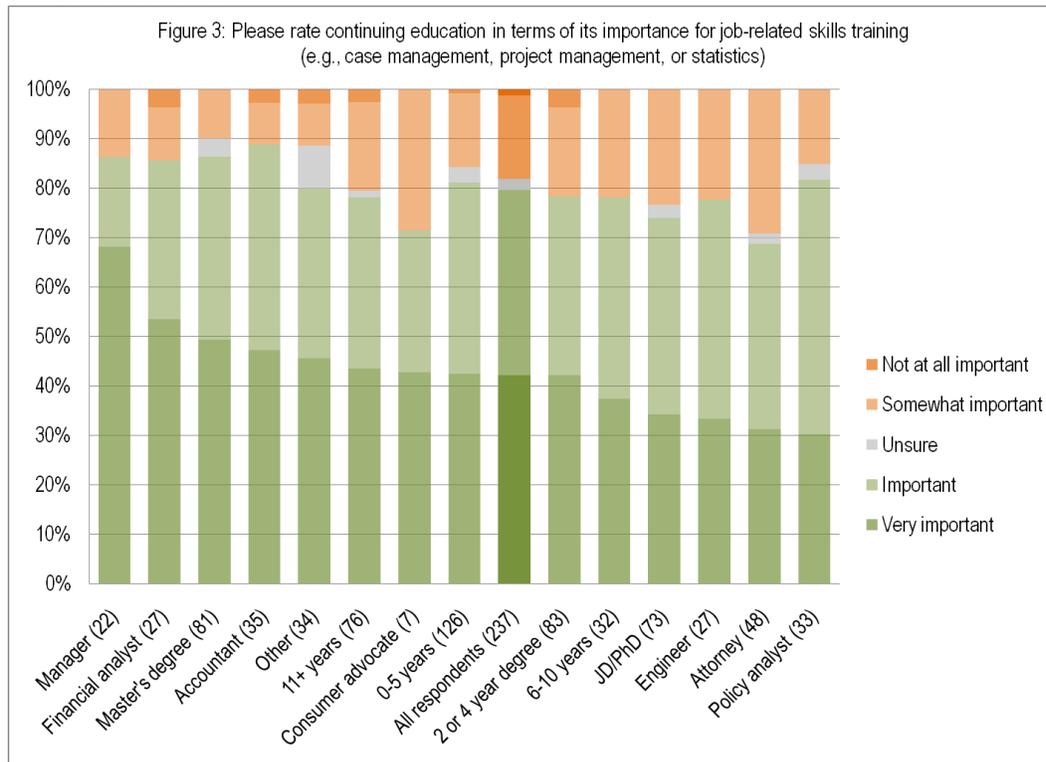
Value	Count	Percent %
Very interested	54	23%
Somewhat interested	124	52.8%
Not very interested	49	20.9%
Not interested at all	8	3.4%

Attachment 3 Select Questions by Respondent Characteristics

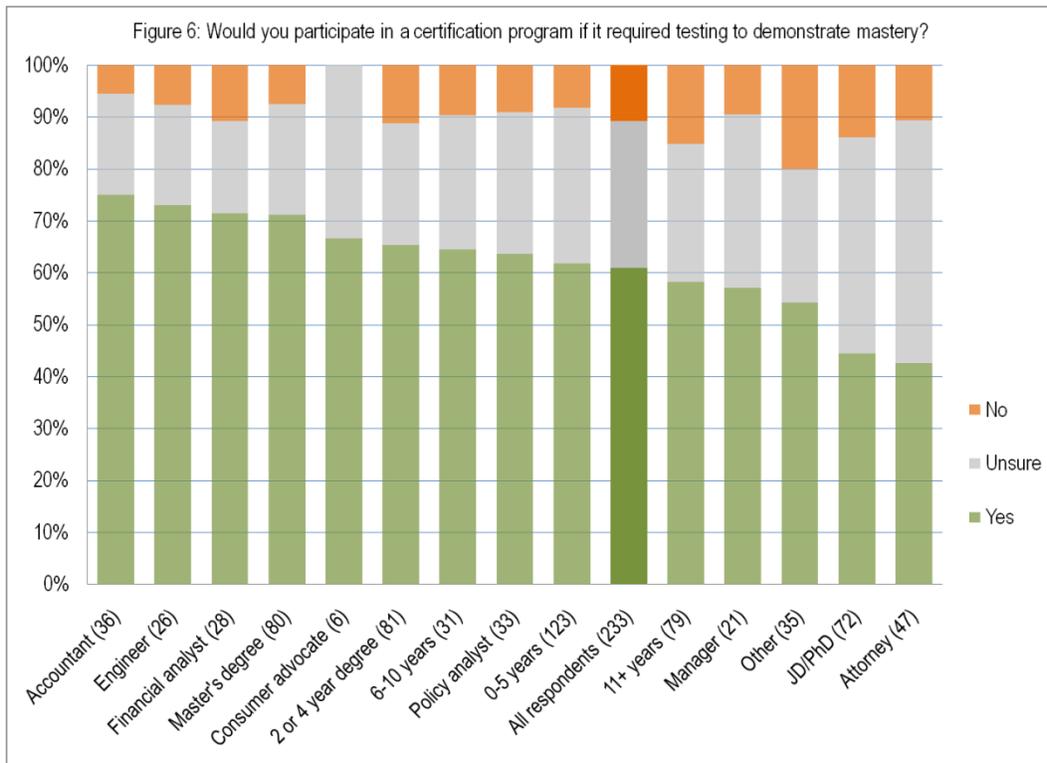
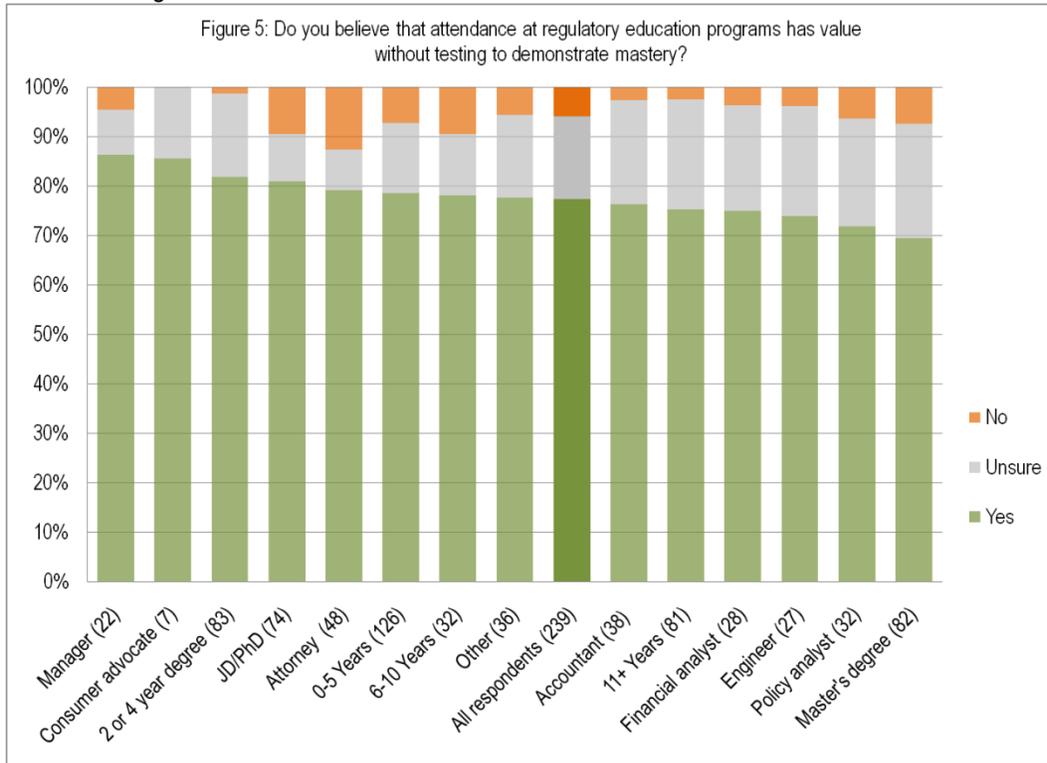
Importance of continuing education



Skills and accreditation



Role of testing



Motivation and interest

