

**From:** scott carnegie  
**To:** [SoS Rulemaking](#)  
**Subject:** Written comments - proposed notary rules - 4/17/18 hearing  
**Date:** Monday, April 16, 2018 9:14:41 AM

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**Regarding the proposal to require new testing at notary renewal:**

1. If your concern is primarily notaries that may never have been tested, rather than require testing at every renewal, just do it once for every notary in the force, or just those of us that have never been tested.

2. If your concern is for every notary, previously tested as well, due to any changes that may have happened between renewals, you could choose to test at renewals only for the new changes, or for areas where you've seen errors in practice in the most recent year.

With either situation, to minimize the burden to notaries and the businesses that utilize them, I recommend that, since you host the test as open-book, you not require the training, and allow multiple attempts. If we fail the test, and you let us know which items we failed, that will become our study guide for the next attempt. This eliminates travel time, unnecessary study time for areas already absorbed, and vendor costs to the notary and their employers that utilize them.

As to any voluntary or required training beyond the test itself, I'd recommend that the Secretary of State provide a free training as they have done in the past, on their website. Though you could also offer 3<sup>rd</sup> party vendor training for those that choose it, if you did not, it would eliminate having to certify their trainings, as the training on your website would be your own.

**Regards,**

*Scott Carnegie*

Notary in Weld County