

REGULATORY REVIEW FORM		This space for use by IRRC RECEIVED 2008 MAY -3 PM 12:03 REVIEW COMMISSION	
		IRRC Number: 2006	
(1) Agency Department of State, Bureau of Professional and Occupational Affairs, State Board of Pharmacy			
(2) I.D. Number (Governor's Office Use) 16A-548			
(3) Short Title Application Fees			
(4) PA Code Cite 49 Pa. Code §27.91		(5) Agency Contacts & Telephone Numbers Primary Contact: Eva L. Cheney, Counsel State Board of Pharmacy (717)783-7200 Secondary Contact: Joyce McKeever, Deputy Chief Counsel, Regulatory Review (717)78 3-1088	
(6) Type of Rulemaking (check one) <input type="checkbox"/> Proposed Rulemaking <input checked="" type="checkbox"/> Final Order Adopting Regulation <input type="checkbox"/> Final, Proposed Omitted		(7) Is a 120-Day Emergency Certification Attached? <input checked="" type="checkbox"/> No Yes: By the Attorney General Yes: By the Governor	
(8) Briefly explain the regulation in clear and nontechnical language. <p>The regulation amends the fee schedule for the State Board of Pharmacy by revising fees for applications for initial pharmacy licenses, new pharmacy permits, intern registration, changes in pharmacy permits, reinspections of new pharmacies after failure at first inspection, verifications of licenses and permits and certifications of examination scores and internship hours. The new fees are needed because the current fees established in 1988 no longer reflect the cost of providing the enumerated services.</p>			
(9) State the statutory authority for the regulation and any relevant state or federal court decisions. <p>The regulatory amendments are adopted under Section 8.2 of the Pharmacy Act, Act of September 27, 1961, P.L. 1700, <u>as amended</u>, 63 P.S. §390-8.2.</p>			

REGULATORY ANALYSIS FORM

(10) Is the regulation mandated by any federal or state law or court order, or federal regulation? If yes, cite the specific law, case or regulation, and any deadlines for action.

Yes. The Board is required by statute to adopt regulations setting fees. See Item No. 9 for the specific law.

(11) Explain the compelling public interest that justifies the regulation. What is the problem it addresses?

The enabling statute of the Board requires that the Board set fees by regulation so that revenues meet or exceed expenditures over a biennial period. The operating expenses of the Board are generally borne by the licensee population through biennial renewal revenue. Expenses related to services which are provided directly to individual licensees or applicants are excluded from general operating revenues so that only the licensee who uses a particular service pays for a service being provided to him or her. By this regulation, the cost of providing the service will be apportioned to users, rather than burdening the entire licensee population.

(12) State the public health, safety, environmental or general welfare risks associated with nonregulation.

Nonregulation could potentially adversely impact the fiscal integrity of the Board. If left unregulated, the costs of providing these services would be borne by the general licensing population, some of whom did not or would not receive a benefit from the service.

(13) Describe who will benefit from the regulation. (Quantify the benefits as completely as possible and approximate the number of people who will benefit.)

The licensing population generally will benefit by having costs of services which are utilized by only a portion of the licensees or applicants paid by those actually using the service.

Regulatory Analysis Form

(14) Describe who will be adversely affected by the regulation. (Quantify the adverse effects as completely as possible and approximate the number of people who will be adversely affected.)

The Board has identified no group of individuals or entities who will be adversely affected by the regulation. Applicants for services or licenses will be required to bear the up-to-date costs of providing the services involved.

(15) List the persons, groups or entities that will be required to comply with the regulation. (Approximate the number of people who will be required to comply.)

Applicants for intern certificates, pharmacist licenses, pharmacy permits, changes in pharmacy permits, verifications of licensure or permits and certification of scores or internship hours will be required to pay the applicable fees. The Board estimates that approximately 5,705 persons will avail themselves of one or more of the enumerated services in a two-year period.

(16) Describe the communications with and input from the public in the development and drafting of the regulation. List the persons and/or groups who were involved, if applicable.

Notice of proposed rulemaking was published at 29 Pa. B. 1088 (February 27, 1999). Publication was followed by a 30-day public comment period during which the Board received no comments. Following the close of the public comment period, the Board received comments from the House Professional Licensure Committee and the Independent Regulatory Review Commission.

(17) Provide a specific estimate of the costs and/or savings to the regulated community associated with compliance, including any legal, accounting or consulting procedures which may be required.

The Board estimates that 5,705 persons will avail themselves of one or more of the enumerated services within a biennial period. Total aggregate additional cost for the regulated community for a biennial period would be approximately \$42,075. However, only those requesting the services will be affected. No legal, accounting or consulting procedures will be implicated in complying with the regulatory amendments.

REGULATORY ANALYSIS

(18) Provide a specific estimate of the costs and/or savings to local governments associated with compliance, including any legal, accounting or consulting procedures which may be required.

Local governments would not be affected by the regulation.

(19) Provide a specific estimate of the costs and/or savings to state government associated with the implementation of the regulation, including any legal, accounting, or consulting procedures which may be required.

The Board will not incur an increase in administrative costs by implementing the regulation. Indeed, the regulatory amendments will permit the Board to recoup the costs of providing the enumerated services.

Regulatory Analysis Form

(20) In the table below, provide an estimate of the fiscal savings and costs associated with implementation and compliance for the regulated community, local government, and state government for the current year and five subsequent years.

	Current FY Year	FY +1 Year	FY +2 Year	FY +3 Year	FY +4 Year	FY +5 Year
SAVINGS:	\$	\$	\$	\$	\$	\$
Regulated	\$8,000.00	\$8,000.00	\$8,000.00	\$8,000.00	\$8,000.00	\$8,000.00
Local Government						
State Government						
Total Savings						
COSTS:						
Regulated	\$29,037.5	\$29,037.5	\$29,037.5	\$29,037.5	\$29,037.5	29,037.5
Local Government						
State Government						
Total Costs						
REVENUE LOSSES:						
Regulated						
Local Government						
State Government						
Total Revenue Losses						

(20a) Explain how the cost estimates listed above were derived.

The cost estimates are based upon the following number of persons which the Board estimates will avail themselves of the specified service over a fiscal year period (one-half biennium) multiplied by the savings or additional cost to the applicant for the service:

a) pharmacy intern certificate	\$5(s)*	X	700	=	\$3,500(s)
b) pharmacist license	\$15(c)**	X	637.5	=	\$9,562.50(c)
c) certification of scores or hours	\$10(c)	X	400	=	\$4,000(c)
d) verification of license or permit	\$5(c)	X	650	=	\$3,250(c)
e) pharmacy permit	\$45(s)	X	100	=	\$4,500(s)
f) reinspection after failure	\$45(c)	X	5	=	\$225 (c)
g) permit change without inspection	\$15(c)	X	200	=	\$3,000(c)
h) permit change with inspection	\$45(c)	X	200	=	\$9,000(c)

* designates savings
 ** designates additional cost

Regulatory Analysis Form

(20b) Provide the past three year expenditure history for programs affected by the regulation.

Program	FY -3	FY -2	FY -1	Current FY
See attached fee	report forms.			

(21) Using the cost-benefit information provided above, explain how the benefits of the regulation outweigh the adverse effects and costs.

The amendments to the existing regulations will assure that the costs of providing the specified services to certain applicants and licensees will be borne by individuals who receive the service.

(22) Describe the nonregulatory alternatives considered and the costs associated with those alternatives. Provide the reasons for their dismissal.

No nonregulatory alternatives were considered because the Board's enabling statute requires the Board to promulgate regulations to establish fees or changes thereto.

(23) Describe alternative regulatory schemes considered and the costs associated with those schemes. Provide the reasons for their dismissal.

See No. 22 above.

(24) Are there any provisions that are more stringent than federal standards? If yes, identify the specific provisions and the compelling Pennsylvania interest that demands stronger regulation.

No federal licensure standards apply.

(25) How does this regulation compare with those of other states? Will the regulation put Pennsylvania at a competitive disadvantage with other states?

This regulation does not put Pennsylvania at a competitive disadvantage with other states. Following is a comparison of Pennsylvania fees with other states.

STATE	PA	NJ	NY	MD	OH
Application for pharmacy Intern Certificate	\$30.00	-0-	\$70	-0-	\$22.50
Application for Pharmacist License	\$ 40.00	\$125	\$270	-0-	\$165
* (Recip) Certification of Examination Scores or Internship Hours	\$337.50				
	\$ 25.00	-0-	\$20	-0-	\$10
Verification of Licensure	\$ 15.00	-0-	\$10	-0-	\$7.50
New Pharmacy Permit Application	\$100.00	\$275	\$345	\$250	\$150
Reinspection of New Pharmacy After Failure at First Inspection	\$ 90.00	-0-	-0-	-0-	-0-
Pharmacy Permit Change without Inspection	\$ 30.00	\$25	unknown	\$150	-0-
Pharmacy Permit Change when Inspection Required	\$ 95.00	\$275	\$50	\$150	-0-
Change in Pharmacy Ownership or Board of Directors	\$ 30.00	\$275	\$345	\$150	\$150
Verification of Permit	\$ 15.00	-0-	\$10	-0-	\$7.50

*Reciprocal License

(26) Will the regulation affect existing or proposed regulations of the promulgating agency or other state agencies? If yes, explain and provide specific citations.

This regulation will have no effect on other regulations of the Board or other state agencies.

Regulatory Analysis Form

(27) Will any public hearings or informational meetings be scheduled? Please provide the dates, times, and locations, if available.

In light of the statutory mandate, the Board has scheduled no public hearings or informational meetings regarding this regulation.

(28) Will the regulation change existing reporting, record keeping, or other paperwork requirements? Describe the changes and attach copies of forms or reports which will be required as a result of implementation, if available.

No changes to reporting, recordkeeping or other paperwork are required by this regulation.

(29) Please list any special provisions which have been developed to meet the particular needs of affected groups or persons including, but not limited to, minorities, elderly, small businesses, and farmers.

The Board has perceived no special needs of any subset of its applicants or licensees for whom special accommodations should be made.

(30) What is the anticipated effective date of the regulation; the date by which compliance with the regulation will be required; and the date by which any required permits, licenses or other approvals must be obtained?

The regulation will be effective upon publication as an Order of Final Rulemaking in the *Pennsylvania Bulletin*.

(31) Provide the schedule for continual review of the regulation.

The Board reviews its revenues and costs of its programs on a fiscal year and biennial basis.

there are no direct fiscal impacts from providing these protections. The private sector, regulated community has asserted that designation of certain fish as endangered or threatened may have fiscal impacts because of impacts on permitting decisions by the Department of Environmental Protection and other agencies. If an endangered or threatened species is found in an area slated for development, applicants for permits may be required to conduct additional studies or adjust the project to avoid impacts. These are fiscal impacts resulting from regulatory and statutory authorities other than those under the aegis of the Commission. In addition, this proposed rulemaking has extremely limited indirect fiscal impacts. One species (the bridle shiner found only in the Marshalls Creek watershed) is proposed to move from candidate status to endangered status, one from endangered status to threatened status (longnose darter) and four from candidate status to unlisted status.

H. Public Comments

Interested persons are invited to submit written comments, objections or suggestions about the proposed amendments to the Executive Director, Fish and Boat Commission, P. O. Box 67000, Harrisburg, PA 17106-7000, within 30 days after publication of this notice in the Pennsylvania Bulletin. Comments submitted by facsimile will not be accepted.

Comments also may be submitted electronically at "regulations@fish.state.pa.us." A subject heading of the proposal and a return name and address must be included in each transmission. If an acknowledgment of electronic comments is not received by the sender within 2 working days, the comments should be retransmitted to ensure receipt.

PETER A. COLANGELO, Executive Director

(Editor's Note: A proposal to amend §§ 75.1-75.3 remains outstanding at 28 Pa.B. 3591 (August 1, 1998).)

Fiscal Note: 48A-93. No fiscal impact; (8) recommends adoption.

Annex A

TITLE 58. RECREATION

PART II. FISH AND BOAT COMMISSION

Subpart B. FISHING

CHAPTER 75. ENDANGERED SPECIES

§ 75.1. Endangered species.

* * * * *

(b) Fish. The following species are endangered:

* * * * *

[(9) Longhead Darter, Percina macrocephala.]

* * * * *

(36) Bridle shiner, Notropis bifrenatus.

* * * * *

§ 75.2. Threatened species.

* * * * *

(b) Fish. The following species are threatened:

* * * * *

(10) Longhead darter, Percina macrocephala.

* * * * *

§ 75.3. Candidate species.

* * * * *

(b) Fishes.

(1) [Silver Lamprey, Ichthyomyzon unicuspis.]

[(2)] * * *

[(3)] (2) * * *

[(4)] (3) * * *

[(5)] (4) * * *

[(6)] (5) * * *

[(7)] (6) * * *

[(8)] (7) * * *

[(9)] (8) * * *

[(10)] (9) * * *

[(11) Brindle Shiner, Notropis bifrenatus.]

[(12)] (10) * * *

[(13)] (11) * * *

[(14)] (12) * * *

[(15)] (13) * * *

[(16)] (14) * * *

[(17)] (15) * * *

[(18)] (16) * * *

[(19)] (17) * * *

[(20)] (18) * * *

[(21)] (19) * * *

[(22)] (20) * * *

[(23)] (21) * * *

[(24)] (22) * * *

[(25)] (23) * * *

[(26) Potomac Sculpin, Cottus girardi.

(27) Spoonhead Sculpin, Cottus ricei.

(28) Deepwater Sculpin, Myoxocephalus thompsoni.]

* * * * *

[Pa.B. Doc. No. 99-305. Filed for public inspection February 26, 1999, 9:00 a.m.]

STATE BOARD OF PHARMACY

[49 PA. CODE CH. 27]

Application Fees

The State Board of Pharmacy (Board) proposes to amend § 27.91 (relating to schedule of fees) by revising certain application fees to read as set forth in Annex A.

A. Effective Date

The proposed amendment will be effective upon publication of the final-form regulation in the *Pennsylvania Bulletin*.

B. Statutory Authority

The proposed amendment is authorized under section 8.2 of the Pharmacy Act (act) (63 P. S. § 390-8.2).

C. Background and Purpose

The act requires the Board to set fees by regulation so that revenues meet or exceed expenditures over a biennial period. General operating expenses of the Board are funded through biennial license renewal fees. Expenses related to applications or services which are provided directly to individual licensees or applicants are excluded from general operating revenues and are funded through fees in which the cost of providing the service forms the basis for the fee.

In a recent systems audit of the operations of the Board within the Bureau of Professional and Occupational Affairs, the fees for services to licensees and applicants were analyzed to determine if the fees reflected the actual cost of providing the services. Actual cost calculations are based upon the following formula:

$$\frac{\text{number of minutes to perform the function} \times \text{pay rate for the classification of personnel performing the function}}{\text{a proportionate share of administrative overhead}}$$

The analysis determined that the fees for applications for initial pharmacy licenses, new pharmacy permits, intern registration, changes in pharmacy permits, reinspections of new pharmacies after failure at first inspection, verifications of licenses and permits, and certifications of examination scores and internship hours did not accurately reflect the actual cost involved of providing the services. Fees for the Board in these categories have not been revised since 1988. In some cases the fees exceeded actual cost, but in most, the fees fell short of the cost to provide the service.

In this proposal, fees for the services identified would be adjusted to allocate costs to those who use the service or application. The Board would continue to apportion the enforcement and operating costs to the general licensing population when the Board makes its biennial reconciliation of revenue and expenditures.

D. Compliance with Executive Order 1996-1

In accordance with the requirements of Executive Order 1996-1 (February 6, 1996), in drafting and promulgating the regulation the Board considered the least restrictive alternative to regulate costs for services requested by licensees and applicants.

E. Fiscal Impact and Paperwork Requirements

The proposed amendment will have no adverse fiscal impact on the Commonwealth or its political subdivisions. The fees will have a modest fiscal impact on those members of the private sector who apply for services from the Board. The proposed amendment will impose no additional paperwork requirements upon the Commonwealth, political subdivisions or the private sector.

F. Sunset Date

The Board continuously monitors the cost effectiveness of its regulations. Therefore, no sunset date has been assigned.

G. Regulatory Review

Under section 5(a) of the Regulatory Review Act (71 P. S. § 745.5(a)), on February 17, 1999, the Board submitted a copy of this proposed amendment to the Independent Regulatory Review Commission (IRRC) and the Chairpersons of the House Professional Licensure Committee and the Senate Consumer Protection and Professional Licensure Committee. In addition to submitting the proposed amendment, the Board has provided IRRC and the Committees with a copy of a detailed regulatory analysis form prepared by the Board in compliance with Executive Order 1996-1, "Regulatory Review and Promulgation." A copy of this material is available to the public upon request.

Under section 5(g) of the Regulatory Review Act, if IRRC has objections to any portion of the proposed amendment, it will notify the Board within 10 days of the close of the Committees' review period. The notification shall specify the regulatory review criteria which have not been met by that portion. The Regulatory Review Act specifies detailed procedures for review, prior to final publication of the regulation, by the Board, the General Assembly and the Governor, of objections raised.

H. Public Comment

Interested persons are invited to submit written comments, suggestions or objections regarding the proposed amendment to Rita T. Solie, Chief, Health Licensing Division, State Board of Pharmacy, P. O. Box 2649, Harrisburg, PA 17105-2649, within 30 days of publication of this proposed rulemaking. Please reference No. 16A-548 (Application Fees), when submitting comments.

PAULA L. CASTOR, R.Ph.,
Chairperson

Fiscal Note: 16A-548. No fiscal impact; (8) recommends adoption.

Annex A

TITLE 49. PROFESSIONAL AND VOCATIONAL STANDARDS

PART I. DEPARTMENT OF STATE

Subpart A. PROFESSIONAL AND OCCUPATIONAL AFFAIRS

CHAPTER 27. STATE BOARD OF PHARMACY FEES

§ 27.91. Schedule of fees.

An applicant for a license, certificate, permit or service shall pay the following fees at the time of application:

- Application for pharmacy intern certificate .. \$[35] 30
- Application for pharmacist license \$[25] 40
- [Effective with the March 1997 examinations:

- North American Pharmacist Licensure Examination (NAPLEX)..... \$250
- Federal Drug Law Examination (FDLE)..... \$75
- Effective with the November 1, 1998, examinations:]

* * * * *

- Certification of examination scores or internship hours \$[15] 25

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revising
nnex A

PROPOSED RULEMAKING

[Certification of current] Verification
of licensure \$[10] 15

* * * * *

New pharmacy permit application \$[145] 100

Reinspection of new pharmacy after failure
at first inspection \$[45] 90

Pharmacy permit change without inspection . \$[15] 30

Pharmacy permit change when inspection
required..... \$[50] 95

Change in pharmacy ownership or Board of
Directors \$[15] 30

[Certification of valid] Verification of
permit \$[10] 15

* * * * *

(Pa.B. Doc. No. 99-306. Filed for public inspection February 26, 1999, 9:00 a.m.)

FEE REPORT FORM

Agency: State - BPOA
Contact: David Williams
Phone No. 783-7194

Date: March 14, 2000

Fee Title, Rate and Estimated Collections:

License Application Fee = \$ 40.00

Estimated Biennial Revenue: \$ 51,000.00(1,275 applications x \$40.00)

Fee Description:

The fee will be charged to each applicant for licensure as a Registered Pharmacist.

Fee Objective:

The fee should (1) offset the identifiable costs incurred by the State Board of Pharmacy to review and process an application for licensure as a Registered Pharmacist and (2) defray a portion of the Board's administrative overhead.

Fee-Related Activities and Costs:

Board Staff- review application:	(1.00/hr)	20.30
Administrative Overhead:		17.28
	Total Estimated Cost:	37.58
	Proposed Fee:	\$ 40.00

Analysis, Comment, and Recommendation:

It is recommended that a fee of \$40.00 be established to review an application for licensure as a Registered Pharmacist.

Board staff receives application, reviews for completeness, contacts applicant to request any missing information, verifies applicant's educational background for compliance with regulations, verifies examination scores. Processes through computer and issues license if all requirements are met; notifies applicant of denial if ineligible.

FEE REPORT FORM

Agency: State - BPOA

Date: March 14, 2000

Contact: David Williams

Phone No. 783-7194

Fee Title, Rate and Estimated Collections:

Pharmacy Intern Registration Fee = \$ 30.00

Estimated Biennial Revenue: \$42,000.00 (1,400 applications x \$30.00)

Fee Description:

The fee will be charged to each applicant for registration as a Registered Intern.

Fee Objective:

The fee should (1) offset the identifiable costs incurred by the State Board of Pharmacy to review and process an application for registration as a Registered Intern and (2) defray a portion of the Board's administrative overhead.

Fee-Related Activities and Costs:

Board Staff- review application:	(0.50/hr)	10.15
Administrative Overhead:		17.28
	Total Estimated Cost:	27.43
	Proposed Fee:	\$ 30.00

Analysis, Comment, and Recommendation:

It is recommended that a fee of \$30.00 be established to review an application for registration as a Pharmacist Intern.

Board staff receives application, reviews for completeness, contacts applicant to request any missing information, verifies applicant's educational background for compliance with regulations, verifies examination scores. Processes through computer and issues license if all requirements are met; notifies applicant of denial if ineligible.

FEE REPORT FORM

Agency: State - BPOA

Date: March 14, 2000

Contact: David Williams

Phone No. 783-7194

Fee Title, Rate and Estimated Collections:

New Pharmacy Application Fee = \$ 100.00

Estimated Biennial Revenue: \$20,000.00 (200 applications x \$100.00)

Fee Description:

The fee will be charged to each applicant for registration of a new Pharmacy.

Fee Objective:

The fee should (1) offset the identifiable costs incurred by the State Board of Pharmacy to review and process an application for registration for a new Pharmacy and (2) defray a portion of the Board's administrative overhead.

Fee-Related Activities and Costs:

Board Staff- review application:	(1.00/hr)	20.30
Law Enforcement-Inspection:	(2.00/hr)	60.40
Administrative Overhead:		17.28

Total Estimated Cost: 97.98

Proposed Fee: \$ 100.00

Analysis, Comment, and Recommendation:

It is recommended that a fee of \$100.00 be established to process an application for registration of a new Pharmacy.

Board staff receives application, reviews for completeness, contacts applicant to request any missing information. Forwards to Bureau of Enforcement and Investigation for inspection & confirmation of compliance with regulations. After receipt of inspection results from B.E.I., processes through computer and issues license if all requirements are met; issues discrepancy notice if requirements are not met.

FEE REPORT FORM

Agency: State - BPOA
Contact: David Williams
Phone No. 783-7194

Date: March 14, 2000

Fee Title, Rate and Estimated Collections:

Each re-inspection after 1st failure (New Pharmacy) = \$ 90.00

Estimated Biennial Revenue: \$900.00 (10 applications x \$90.00)

Fee Description:

The fee will be charged for each re-inspection required to issue a new Pharmacy Permit.

Fee Objective:

The fee should (1) offset the identifiable costs incurred by the State Board of Pharmacy to re-inspect (after 1st failure) a new Pharmacy prior to issuing permit and (2) defray a portion of the Board's administrative overhead.

Fee-Related Activities and Costs:

Board Staff- review application:	(.50/hr)	10.15
Law Enforcement-Inspection:	(2.00/hr)	60.40
Administrative Overhead:		17.28

Total Estimated Cost:	87.73
Proposed Fee:	\$90.00

Analysis, Comment, and Recommendation:

It is recommended that a fee of \$90.00 be established to re-inspect (after 1st failure) a new Pharmacy.

If all requirements are not met at 1st inspection, Bureau of Enforcement and Investigation notifies Board Office and schedules another inspection. Results of the re-inspection are forwarded to Board Office for processing, either through computer to issue license if all requirements are met or by discrepancy notice if requirements are not met. The charge is imposed for every re-inspection necessary to determine compliance.

FEE REPORT FORM

Agency: State - BPOA

Date: March 14, 2000

Contact: David Williams

Phone No. 783-7194

Fee Title, Rate and Estimated Collections:

Pharmacy Change/ Inspection Required = \$95.00

Estimated Biennial Revenue: \$38,000.00 (400 applications x \$95.00)

Fee Description:

The fee will be charged for each application to modify an existing Pharmacy Permit when an inspection is required.

Fee Objective:

The fee should (1) offset the identifiable costs incurred by the State Board of Pharmacy to process a change application requiring an inspection and (2) defray a portion of the Board's administrative overhead.

Fee-Related Activities and Costs:

Board Staff- review application:	(.75/hr)	15.23
Law Enforcement Staff- inspection:	(2.0/hr)	60.40
Administrative Overhead:		17.28

Total Estimated Cost:	92.91
Proposed Fee:	\$95.00

Analysis, Comment, and Recommendation:

It is recommended that a fee of \$95.00 be established to process a pharmacy permit change application requiring an inspection.

Page 2 Pharmacy Change Requiring Inspection:

March 14, 2000

Board staff - receives application from a currently licensed pharmacy requesting a change that requires an inspection of facilities due to remodeling or expansion, etc. Reviews for completeness, contacts applicant to request any missing information, forwards request to Bur. of Enforcement and Investigation for inspection and confirmation of compliance with regulations. Following receipt of inspection results from B.E.I., processes through computer by issuing revised license or notifying applicant that additional information/clarification is necessary prior to processing.

FEE REPORT FORM

Agency: State - BPOA
Contact: David Williams
Phone No. 783-7194

Date: March 14, 2000

Fee Title, Rate and Estimated Collections:

Pharmacy Change/No Inspection Required = \$ 30.00

Estimated Biennial Revenue: \$12,000.00 (400 applications x \$30.00)

Fee Description:

The fee will be charged for each application to modify an existing Pharmacy Permit (change of manager, ownership, director or postal change not requiring an inspection).

Fee Objective:

The fee should (1) offset the identifiable costs incurred by the State Board of Pharmacy to process a change to modify an existing Pharmacy and (2) defray a portion of the Board's administrative overhead.

Fee-Related Activities and Costs:

Board Staff- review application:	(.50/hr)	10.15
Administrative Overhead:		17.28
	Total Estimated Cost:	27.43
	Proposed Fee:	\$30.00

Analysis, Comment, and Recommendation:

It is recommended that a fee of \$30.00 be established to process a pharmacy permit change application if no inspection is required.

Page 2 Pharmacy Permit Change/No Insp. Required:

March 14, 2000

Board staff - receives application from a currently licensed pharmacy requesting a change that does not require an inspection of facilities (change in manager, change of ownership, etc.). Information is verified and change is processed by issuing revised license through computer or notifying applicant that additional information/clarification is necessary prior to processing.

FEE REPORT FORM

Agency: State - BPOA

Date: March 14, 2000

Contact: David Williams

Phone No. 783-7194

Fee Title, Rate and Estimated Collections:

Verification of Licensure or Permit: \$15.00

Estimated Biennial Revenue: \$19,500.00 (1,300 verifications x \$15.00)

Fee Description:

The fee will be charged to every applicant who requests verification of licensure or permit.

Fee Objective:

The fee should (1) offset the identifiable costs incurred by the State Board of Pharmacy to review and process a request for verification and (2) defray a portion of the Board's administrative overhead.

Fee-Related Activities and Costs:

Staff time- process request for verification	(.08 hr)	1.62
Bureau Average Administrative Overhead:		9.76
	Total Estimated Cost:	\$11.38
	Proposed Fee:	\$15.00

Analysis, Comment, and Recommendation:

It is recommended that a fee of \$15.00 be established for verification of licensure or permit.

Board Staff: Reviews request for verification, researches computer, microfilm or other files to retrieve pertinent information, transfers that information onto document submitted by requester, affixes Bureau seal onto documents, forwards as instructed by applicant.

FEE REPORT FORM

Agency: State - BPOA

Date: March 14, 2000

Contact: David Williams

Phone No. 783-7194

Fee Title, Rate and Estimated Collections:

Certification of Scores or Intern Hours: \$ 25.00

Estimated Biennial Revenue: \$20,000.00 (800 certifications x \$25.00)

Fee Description:

The fee will be charged to every applicant who requests certification of scores or intern hours.

Fee Objective:

The fee should (1) offset the identifiable costs incurred by the State Board of Pharmacy to review and process a request for certification and (2) defray a portion of the Board's administrative overhead.

Fee-Related Activities and Costs:

Staff time- process request for certification (.75 hr)	15.23
Bureau Average Administrative Overhead:	9.76
Total Estimated Cost:	\$24.99
Proposed Fee:	\$25.00

Analysis, Comment, and Recommendation:

It is recommended that a fee of \$25.00 be established for certification of scores or intern hours.

Board Staff: Reviews request for certification of scores or intern hours; researches computer and microfilm files to retrieve pertinent information, transfers that information onto document submitted by requester, affixes Bureau seal onto documents, forwards as instructed by applicant.

MARIO J. CIVERA, JR., MEMBER
HOUSE POST OFFICE BOX 202020
MAIN CAPITOL BUILDING
HARRISBURG, PENNSYLVANIA 17120-2020

232 LONG LANE
UPPER DARBY, PENNSYLVANIA 19082



House of Representatives
COMMONWEALTH OF PENNSYLVANIA
HARRISBURG

COMMITTEES

PROFESSIONAL LICENSURE.
MAJORITY CHAIRMAN
LIQUOR CONTROL
FIREFIGHTERS' CAUCUS.
COCHAIRMAN EMERITUS

April 13, 1999

RECEIVED

APR 16 1999

BPOA LEGAL COUNSEL

John R. McGinley, Jr., Chairman
Independent Regulatory Review Commission
14th Floor, 333 Market Street
Harrisburg, PA 17101

Dear Chairman McGinley:

This is to advise you that the House Professional Licensure Committee met on April 13, 1999, and submits the following comments pertaining to the regulations considered by the Committee:

The Committee voted to take no formal action on Regulation 16A-548, State Board of Pharmacy, until final-form regulations are promulgated. However, the Committee is requesting additional information as to the category of "certification of scores or intern hours." The Committee is questioning under what circumstances the Board would "certify" an examination score or intern hours. In the fee report form, the explanations as to what functions the Board staff performs for certification and verification are identical. The Committee requests an explanation as to the distinction between these two categories and what accounts for the differential in fees.

Please feel free to contact my office if any questions should arise.

Sincerely,

A handwritten signature in cursive script that reads "Mario J. Civera".

Mario J. Civera, Chairman
House Professional Licensure Committee

MJC/sms
Enclosure

cc: Kim H. Pizzingrilli, Secretary of the Commonwealth
Department of State
✓ Frank A. Rubino, R.Ph., Chairman
State Board of Pharmacy

Regulation 16A-548

State Board of Pharmacy

PROPOSAL: Regulation 16A-548 amends 49 PA Code, Chapter 27, regulations of the State Board of Pharmacy. The amendment makes revisions to the schedule of Board fees by increasing fees for providing certain services, and in two instances, reducing the fees.

The proposed Rulemaking was published in the Pennsylvania Bulletin on February 27, 1999. The Professional Licensure Committee has until April 19, 1999, to submit comments on the regulation.

ANALYSIS: Pursuant to Sec. 8.2 of the Pharmacy Act, 63 P.S. Sec. 390-8.2, the Board is required to meet expenditures through revenues raised by fees, fines and civil penalties. The Board states that a recent systems audit determined that the fees for certain services did not accurately reflect the actual cost involved in providing the service. Accordingly, the Board proposes to amend the schedule of fees as follows:

<u>Application/Service</u>	<u>Current Fee</u>	<u>Proposed Fee</u>
Application for Pharmacy Intern Certificate	\$ 35.00	\$ 30.00
Application for Pharmacist License	\$ 25.00	\$ 40.00
Certification of Examination Scores or Internship Hours	\$ 15.00	\$ 25.00
Verification of Licensure	\$ 10.00	\$ 15.00
New Pharmacy Permit Application	\$145.00	\$100.00
Reinspection of New Pharmacy After Failure at first Inspection	\$ 45.00	\$ 90.00
Pharmacy Permit Change without Inspection	\$ 15.00	\$ 30.00
Pharmacy Permit Change when Inspection Required	\$ 50.00	\$ 95.00
Change in Pharmacy Ownership or Board of Directors	\$ 15.00	\$ 30.00
Verification of Permit	\$ 10.00	\$ 15.00

RECOMMENDATIONS: It is recommended that the Professional Licensure Committee take no formal action until final form regulations are promulgated. However, the Committee is requesting additional information as to the category of "certification of scores or intern hours". The Committee is questioning under what circumstances the Board would "certify" an examination score or intern hours. In the fee report form, the explanations as to what functions the Board staff performs for certification and verification are identical. The Committee requests an explanation as to the distinction between these two categories and what accounts for the differential in fees.

House of Representatives
Professional Licensure Committee
April 8, 1999

JOHN R. MCGINLEY, JR., ESQ., CHAIRMAN
ALVIN C. BUSH, VICE CHAIRMAN
ARTHUR COCCODRILLI
ROBERT J. HARBISON, III
JOHN F. MIZNER, ESQ.
ROBERT E. NYCE, EXECUTIVE DIRECTOR
MARY S. WYATTE, CHIEF COUNSEL



PHONE (717) 783-5417
FAX: (717) 783-2664
irrc@irrc.state.pa.us
<http://www.irrc.state.pa.us>

INDEPENDENT REGULATORY REVIEW COMMISSION
333 MARKET STREET, 14TH FLOOR, HARRISBURG, PA 17101

April 29, 1999

Paula L. Castor, R.Ph., Chairperson
State Board of Pharmacy
116 Pine Street
Harrisburg, PA 17105

RECEIVED
MAY 03 1999
BPOA LEGAL COUNSEL

Re: IRRC Regulation #16A-548 (#2006)
State Board of Pharmacy
Application Fees

Dear Chairperson Castor:

Enclosed are our Comments on your proposed regulation #16A-548. They are also available on our website at <http://www.irrc.state.pa.us>.

The Comments list our objections and suggestions for your consideration when you prepare the final version of this regulation. We have also specified the regulatory criteria which have not been met. These Comments are not a formal approval or disapproval of the proposed version of this regulation.

If you want to meet with us to discuss these Comments, please contact John Jewett at 783-5475.

Sincerely,

Robert E. Nyce
Executive Director

REN:cae

Enclosure

cc: ~~April L. McClaine~~
C. Michael Weaver
Kim Pizzingrilli
Dorothy Childress
Office of General Counsel
Office of Attorney General
Pete Tartline

COMMENTS OF THE INDEPENDENT REGULATORY REVIEW COMMISSION

ON

STATE BOARD OF PHARMACY REGULATION NO. 16A-548

APPLICATION FEES

APRIL 29, 1999

We have reviewed this proposed regulation from the State Board of Pharmacy (Board) and submit for your consideration the following objections and recommendations. Subsections 5.1(h) and 5.1(i) of the Regulatory Review Act (71 P.S. § 745.5a(h) and (i)) specify the criteria the Commission must employ to determine whether a regulation is in the public interest. In applying these criteria, our Comments address issues that relate to fiscal impact, consistency and clarity. We recommend that these Comments be carefully considered as you prepare the final-form regulation.

1. Section 27.91. Schedule of fees. - Fiscal Impact, Consistency and Clarity

Administrative overhead costs

In the proposed regulation's fee report forms, there are significant differences in the costs covered by different fees except for "Administrative Overhead" costs. We met and discussed this situation with staff from the Department of State and its Bureau of Professional and Occupational Affairs (BPOA). They indicated that each fee's overhead cost is calculated by dividing total overhead costs by the number of active licensees. On the other hand, the staff costs are based on the actual time BPOA staff spends performing the tasks covered by each fee.

Although their methodology is reasonable, there is no indication that the fees will recover the actual "overhead" costs. This is because there is no relationship to the service covered by the fees and because the costs are based on past expenditures rather than on projected expenditures. Hence, there is no certainty that the fees' projected revenues "will meet or exceed projected expenditures" pursuant to Section 8.2(a) of the Pharmacy Act (63 P.S. § 390-8.2(a)).

We question the use of a constant overhead cost that is unrelated to the actual costs of activities covered by different fees. Even though this process was used for other fees, why should BPOA maintain this approach? The Board and BPOA should thoroughly examine its cost allocation methodology for overhead expenses and itemize the overhead costs to be recouped by these fees.

Board duties for certification and verification

The House Professional Licensure Committee requested additional information from the Board in two areas. First, it questioned the Board's role in the certification of scores and intern hours. In addition, it noted that the description of Board staff functions in the fee report forms for certification and verification fees were the same. However, there was a significant difference in the staff time and costs for these fees. Staff time for certification equaled 45 minutes at a cost of \$15.23. Staff time for verification was 4.8 minutes at a cost of \$1.62.

Why does the Board certify scores? How much work is required to provide the services covered by these three fees? The Board should explain in detail the answers to these questions when it submits the final-form version of this regulation.

FACE SHEET
FOR FILING DOCUMENTS
WITH THE LEGISLATIVE REFERENCE BUREAU

(Pursuant to Commonwealth Documents Law)

RECEIVED

2000 MAY -3 PM 12:03

LEGISLATIVE REGULATORY
REVIEW COMMISSION

DO NOT WRITE IN THIS SPACE

2006

Copy below is hereby approved as to form and legality. Attorney General

Copy below is hereby certified to be a true and correct copy of a document issued, prescribed or promulgated by:

Copy below is approved as to form and legality. Executive or Independent Agencies.

BY: _____
(DEPUTY ATTORNEY GENERAL)

State Board of Pharmacy
(AGENCY)

BY: [Signature]

DOCUMENT/FISCAL NOTE NO. 16A-548

DATE OF APPROVAL

DATE OF ADOPTION: _____

4/10/00
DATE OF APPROVAL

BY: [Signature]
Michael A. Podgurski

(Deputy General Counsel
(Chief Counsel,
~~Independent Agency~~
(Strike inapplicable title)

TITLE: Chairperson
(EXECUTIVE OFFICER, CHAIRMAN OR SECRETARY)

[] Check if applicable
Copy not approved.
Objections attached.

[] Check if applicable. No Attorney General approval or objection within 30 day after submission.

FINAL RULEMAKING

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE
BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS
STATE BOARD OF PHARMACY
49 Pa. Code, Chapter 27
Fees

The State Board of Pharmacy (Board) hereby amends its regulation at 49 Pa. Code §27.91 by revising certain application fees as set forth in Annex A.

A. Effective date

The amendments take effect upon publication of the final form regulation in the Pennsylvania Bulletin.

B. Statutory Authority

The amendments are authorized under Section 8.2 of the Pharmacy Act, Act of September 27, 1961, P.L. 1700, as amended, 63 P.S. §390-8.2.

C. Background and Purpose

Expenses of the Board which are related to processing individual applications or providing certain services directly to individual licensees or applicants are funded through fees which are based on the cost of providing the service. The fee is charged to the person requesting the service.

A recent systems audit within the Bureau of Professional and Occupational Affairs determined that the application and service fees did not accurately reflect the actual cost of processing the applications and performing the services. A detailed explanation of the background of these fees as well as a description of the fees was published at 29 Pa. B. 1613 (March 27, 1999).

D. Summary of Comments and Responses on Proposed Rulemaking

Following publication of proposed rulemaking at 29 Pa. B. 1613 (March 27, 1999), the Board did not receive any comments from the general public. The Board received comments from the House Professional Licensure Committee (HPLC) and the Independent Regulatory Review Commission (IRRC). The following is the Board's response to those comments.

Administrative overhead costs

IRRC requested that the Board and the Bureau thoroughly examine its cost allocation methodology for administrative overhead and itemize the overhead costs to be recouped by these fees. IRRC commented that although the methodology was reasonable, there was no indication that the fees would recover the actual overhead costs because there was no relationship to the service covered by the fees and because the costs were based upon past expenditures rather than projected

expenditures. IRRC expressed the view that there was no certainty that the projected revenues of the new fee would meet or exceed projected revenues, as required under the Board's enabling statute.

As IRRC noted, the adoption of a Bureau-wide averaged overhead for similar services was made when fees were established in 1989 rulemaking. This methodology was approved by the House and Senate oversight Committees as well as IRRC. Legislative reviewers expressed a preference to "cost out" both user fees and operating revenue fees based upon actual, documented and verifiable factors as opposed to projected expenses or budgets that might never materialize. Thus, the Bureau has recommended and Boards have adopted fee schedules which are based upon actual expenditures. Legislative reviewers at that time felt that a procedure for "rounding up" actual fees would be a sufficient cushion to provide any necessary surplus in non-biennial revenue years and prior to the biennial reconciliation required under board statutes. The Bureau and the boards have used this methodology over five biennial reconciliation periods and have discovered this methodology results in relatively stable and reasonable fees.

The Bureau did consider a suggestion that the Bureau look into other methods of distributing administrative overhead expenses. Results obtained by applying a time factor were compared with the current methodology. The current method recouped 22 per cent of the administrative overhead expenses versus 25 per cent using a ratio based on a time factor. Board staff time varies between 23 and 28 per cent to process a request for services for which user fees are charged. When this time factor calculation is combined with the licensee population, the result is wildly varying costs for difference licensees who are receiving the same services. For example, using that method to produce a verification letter would cost \$34.58 for a landscape architect as compared with a cost of \$10.18 for a cosmetologist. Based upon this analysis the administrative overhead charge of \$9.76 applied to verifications and certifications represented a fair allocation because the work product is essentially the same and because documented experience supports the charge.

Certification and Verification Fee

The HPLC questioned under what circumstances the Board certifies an examination score. The HPLC and IRRC also requested an explanation of the difference between a verification and certification and an explanation of what accounted for the difference in fees.

The certification of a score is made at the request of a licensee when the licensee is seeking to obtain a license in another state based upon a license in Pennsylvania which had been issued as a result of passing a uniform national or regional examination in Pennsylvania. Generally, the state of the original license is the only source of the score of the licensee. Testing agencies do not maintain this information. The licensing laws of many states include provisions that a license will be granted by reciprocity or endorsement based on licensure in another state only if the board or

agency determines that the qualifications are the same or substantially similar in both states. Many state agencies have interpreted such provisions to require that licensees have attained a score equal to or exceeding the passing rate in that jurisdiction at the time of original licensure. For this reason, these states require that the Pennsylvania Board and other boards certify the examination score the applicant achieved on the license examination.

The difference between the verification and certification fees is based on the amount of time required to produce the document requested by the licensee. As noted above, states request different information when making a determination as whether to grant a license based on reciprocity or endorsement from another state. The Bureau has been able to create two documents from its records that meet all of the needs of the requesting state. When the licensee applies to the other state, the licensee receives information as to what documentation and form is acceptable in the requesting state. The Bureau then advises the licensee of the type of document the Bureau can provide and the fee. In the case of a verification the staff produces the requested documentation by a letter, usually computer generated, which contains the license number, date of original issuance and current expiration date, and status of the license. The letters are printed from the Bureau's central computer records and sent to the Board staff responsible for handling the licensee's application. The letters are sealed, folded and mailed in accordance with the directions of the requestor. The Bureau estimates the average time to prepare this document to be five minutes.

The Bureau uses the term certification fee to describe the fee for a request for a document, again generally to support applications for reciprocity or endorsement to other states or for employment or training in another state. A certification document contains information specific to the individual requestor. It may include dates or location where examinations were taken, or examination scores achieved or hours and location of training. The information is entered onto a document which is usually supplied by the requestor. The average time to prepare a certification is 45 minutes. This period of time is required because a number of resources, such as files, microfilm and rosters must be retrieved and consulted in order to provide the information. The Board staff then seals and issues this document.

E. Fiscal Impact and Paperwork Requirements

The proposed amendments will have no adverse fiscal impact on the Commonwealth or its political subdivisions. The fees will have a modest fiscal impact on those members of the private sector who apply for services from the Board. The amendments will impose no additional paperwork requirements upon the Commonwealth, political subdivisions or the private sector.

F. Sunset Date

The Board continuously monitors the cost effectiveness of its regulations. Therefore, no sunset date has been assigned.

G. Regulatory Review

Under Section 5.1(a) of the Regulatory Review Act, Act of June 30, 1989, P.L. 73, No. 19 (71 P.S. §§745.1-745.15), the Board submitted a copy of the notice of proposed rulemaking, published at 29 Pa. B. 1088, to the Independent Regulatory Review Commission and to the Chairpersons of the House Professional Licensure Committee and the Senate Consumer Protection and Professional Licensure Committee for review and comment. In compliance with Section 5(c) of the Regulatory Review Act, the Board also provided IRRC and the Committees with copies of the comments received as well as other documentation.

In preparing these final-form regulations the Board has considered the comments received from IRRC, the Committees, and the public.

These final-form regulations were (deemed) approved by the House and Senate Committee on . IRRC met on , and (deemed) approved the amendments in accordance with section 5(e) of the Regulatory Review Act.

H. Contact Person

Further information may be obtained by contacting Melanie Zimmerman, Executive Secretary, State Board of Pharmacy, P. O. Box 2649, Harrisburg, Pennsylvania 17105-2649, (717) 783-4863.

I. Findings

The Board Finds that:

(1) Public notice of proposed rulemaking was given under sections 201 and 202 of the act of July 31, 1968 (P.L. 769, No. 240) (45 P.S. §§1201 and 1202) and the regulations promulgated thereunder at 1 Pa. Code §§7.1 and 7.2.

(2) A public comment period was provided as required by law and all comments were considered.

(3) These amendments do not enlarge the purpose of proposed rulemaking published at 29 Pa. B. 1088.

(4) These amendments are necessary and appropriate for administration and enforcement of the authorizing acts identified in Part B of this preamble.

I. Order

The Board, acting under its authorizing statutes, orders that:

(a) The regulations of the Board, 49 Pa. Code Chapter 27, are amended by amending §27.91 to read as set forth in Annex A.

(b) The Board shall submit this order and Annex A to the Office of General Counsel and to the Office of Attorney General as required by law.

(c) The Board shall certify this order and Annex A and deposit them with the Legislative Reference Bureau as required by law.

(d) This order shall take effect on publication in the Pennsylvania Bulletin.

ANNEX A

TITLE 49. PROFESSIONAL AND VOCATIONAL STANDARDS
PART I. DEPARTMENT OF STATE
SUBPART A. PROFESSIONAL AND OCCUPATIONAL AFFAIRS
CHAPTER 27. STATE BOARD OF PHARMACY

FEEES

§27.91. Schedule of fees.

An applicant for a license, certificate, permit or service shall pay the following fees at the time of application:

Application for pharmacy intern certificate.....	[\$35] <u>\$30</u>
Application for pharmacist license.....	[\$25] <u>\$40</u>
[Effective with the March 1997 examinations:	
North American Pharmacist Licensure	
Examination (NAPLEX).....	\$250
Federal Drug Law Examination (FDLE).....	\$75
Effective with the November 1, 1998 examinations:]	
North American Pharmacist Licensure Examination (NAPLEX).....	\$250
Multistate Pharmacy Jurisprudence Examination (MPJE).....	\$85
Certification of examination scores or internship hours.....	[\$15] <u>\$25</u>
[Certification of current] <u>Verification of licensure</u>	[\$10] <u>\$15</u>

* * *

New pharmacy permit application.....	[\$145] <u>\$100</u>
Reinspection of new pharmacy after failure at first inspection.....	[\$45] <u>\$90</u>
Pharmacy permit change without inspection.....	[\$15] <u>\$30</u>
Pharmacy permit change when inspection required.....	[\$50] <u>\$95</u>
Change in pharmacy ownership or Board of Directors.....	[\$15] <u>\$30</u>
[Certification of valid] <u>Verification of permit</u>	[\$10] <u>\$15</u>

* * *



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE
BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS
STATE BOARD OF PHARMACY

(717) 783-7156

116 PINE STREET
P. O. BOX 2649
HARRISBURG, PA
17105-2649

May 3, 2000

The Honorable John R. McGinley, Chairman
Independent Regulatory Review Commission
14th Floor, Harristown 2
333 Market Street
Harrisburg, PA 17101


RE: Final Regulation
State Board of Pharmacy
Fees: 16A-548

Dear Chairman McGinley:

Enclosed is a copy of a final rulemaking package of the State Board of Pharmacy pertaining to fees.

The Commission will be pleased to provide whatever information your Commission may require during the course of its review of the rulemaking.

Sincerely,


Michael A. Podgurski, Chairperson
State Board of Pharmacy

MAP:ELC:apm
Enclosures

- c: John T. Henderson, Jr., Chief Counsel
Department of State
- Dorothy Childress, Commissioner
Bureau of Professional and Occupational Affairs
- Joyce McKeever, Deputy Chief Counsel
Department of State
- Gerald S. Smith, Senior Counsel in Charge
Bureau of Professional and Occupational Affairs
- Eva L. Cheney, Counsel
State Board of Pharmacy
State Board of Pharmacy

TRANSMITTAL SHEET FOR REGULATIONS SUBJECT TO THE
REGULATORY REVIEW ACT

RECEIVED

I.D. NUMBER: 16A-548
SUBJECT: State Board of Pharmacy - Fees
AGENCY: DEPARTMENT OF STATE

2000 MAY -3 PM 12: 03

INDEPENDENT REGULATORY
REVIEW COMMISSION



TYPE OF REGULATION

- Proposed Regulation
- X Final Regulation
- Final Regulation with Notice of Proposed Rulemaking Omitted
- 120-day Emergency Certification of the Attorney General
- 120-day Emergency Certification of the Governor
- Delivery of Tolled Regulation
 - a. With Revisions
 - b. Without Revisions

FILING OF REGULATION

DATE	SIGNATURE	DESIGNATION
4/7/00	<i>Deanne Deter</i>	HOUSE COMMITTEE ON PROFESSIONAL LICENSURE
5/3/00	<i>Spout Zedler</i>	SENATE COMMITTEE ON CONSUMER PROTECTION & PROFESSIONAL LICENSURE
5/3/00	<i>St. Helms</i>	INDEPENDENT REGULATORY REVIEW COMMISSION
		ATTORNEY GENERAL
		LEGISLATIVE REFERENCE BUREAU

April 10, 2000