

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

September 27, 1999

COMMITTEES

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

Original: 2047  
Coccodrilli  
cc: Coccodrilli  
Sandusky  
Jewett  
Smith  
McGinley  
Legal

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

Dear Chairman McGinley:

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

The Committee voted to take no formal action until final-form regulations are promulgated on Regulation 16A-414. However, the Committee submits the following comments:

1. The Committee is requesting additional information as to the category of "certification of licensure, registration or scores." The Committee is questioning under what circumstances the Board would "certify" an examination score. 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.
2. The fee report forms list a total estimated cost for each service based on a formula of staff time expended plus average administrative overhead. However, in all cases the proposed fee to be charged is rounded up to the nearest five dollar increment. The Committee is requesting an explanation as to why the proposed fees are rounded up, and are not the actual cost of services as estimated by the Board.
3. The administrative overhead costs for certification of scores, license or registration and verification of license or registration are listed as \$9.76 while all other services are listed as \$17.78. The Committee is requesting an explanation as to what accounts for the difference in administrative overhead costs.

RECEIVED  
1999 SEP 27 PM 4:12  
INDEPENDENT REGULATORY  
REVIEW COMMISSION

The Committee voted to take no formal action until final-form regulations are promulgated on Regulation 16A-566. However, the Committee offers the following comments:

1. The Committee notes that the fee for initial license application for private real estate school would be significantly reduced. The Committee requests a detailed explanation of the application review process, whether the application review process would be changed from the current process, and what accounts for the reduction of fee.
2. The fee report forms list a total estimated cost for each service based on a formula of staff time expended plus average administrative overhead. However, in most cases the proposed fee to be charged is rounded up to the nearest five dollar increment. The Committee is requesting an explanation as to why the proposed fees are rounded up, and are not the actual cost of services as estimated by the Board.
3. The administrative overhead costs for certification of license history is listed as \$9.76 and while all other services are listed as \$13.56. The Committee is requesting an explanation as to what accounts for the difference in administrative overhead costs.

The Committee voted to take no formal action until final-form regulations are promulgated on Regulation 16A-615. However, the Committee submits the following comments:

1. The Committee is requesting additional information as to the category of "certification of licensure or scores." The Committee is questioning under what circumstances the Board would "certify" an examination score. In the fee report form, the explanations as to what functions the Board staff performs for certification and verification are virtually identical. The Committee requests an explanation as to the distinction between these two categories and what accounts for the differential in fees.
2. The fee report forms list a total estimated cost for each service based on a formula of staff time expended plus average administrative overhead. However, in all but a few cases, the proposed fee to be charged is rounded up to the nearest five dollar increment. The Committee is requesting an explanation as to why the proposed fees are rounded up, and are not the actual cost of services as estimated by the Board.

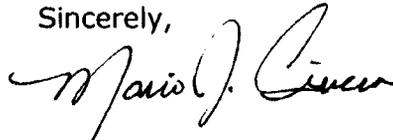
John R. McGinley, Jr., Chairman  
Independent Regulatory Review Commission  
Page 3  
September 27, 1999

3. The administrative overhead costs for certification of license or examination scores and verification of license or permit are listed as \$9.76 while all other services are listed as \$32.96. The Committee is requesting an explanation as to what accounts for the difference in administrative overhead costs.

4. The Committee notes that the fee for application for licensure and Board interview under 15.54(b)(2), 15.54 (b)(3) or 15.56(a)(3) would be increased significantly. The Committee is requesting a more detailed explanation as to the reason and need for such an increase.

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

Sincerely,



Mario J. Civera, Chairman  
House Professional Licensure Committee

MJC/sms  
Enclosures

cc: Robert J. Crowner, R.A., President  
State Architects Licensure Board  
Rita Halverson, Chairperson  
State Real Estate Commission  
David M. DuTot, LA, Chairman  
State Board of Landscape Architects  
Hon. Kim H. Pizzigrilli, Secretary of the Commonwealth  
Department of State

RECEIVED

1999 SEP 27 PM 4: 12

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Regulation 16A-414

State Architects Licensure Board

**PROPOSAL:** Regulation 16A-414 amends 49 PA Code, Chapter 9, regulations of the State Architects Licensure Board. The amendment makes revisions to the schedule of Board fees by increasing the fees for certain services provided by the Board.

The proposed Rulemaking was published in the Pennsylvania Bulletin on August 7, 1999. The Professional Licensure Committee has until September 27, 1999, to submit comments on the regulation.

**ANALYSIS:** Pursuant to Sec. 11 of the Architects Licensure Law, 63 P.S. Sec. 34.11, the Board is required to meet expenditures through revenues raised by fees, fines and civil penalties. The Board is required to increase fees so that projected revenues will meet or exceed projected expenditures. Fees for various services provided directly to applicants or licensees are based upon the actual charge of providing the service requested. The Board does not currently charge a fee for license or registration verification, nor does it currently charge a fee for firm practice registration or modification. The Board states that the following fees would be changed to reflect the actual cost of providing the service:

<u>Application/Service</u>	<u>Current Fee</u>	<u>Proposed Fee</u>
Initial License Application by Exam	\$ 30.00	\$ 40.00
License by Reciprocity with NCARB		
Certification	\$ 20.00	\$ 30.00
License by Reciprocity without NCARB		
Certification	\$ 20.00	\$ 50.00
License Reactivation Fee	\$ 5.00	\$ 30.00
Certification of Licensure, Registration or		
Examination Scores	\$ 15.00	\$ 25.00
Registration or Modification of Firm Practice	\$ 0.00	\$ 50.00
Verify License or Registration	\$ 0.00	\$ 15.00

**RECOMMENDATIONS:** It is recommended that the Professional Licensure Committee take no formal action until final form regulations are promulgated. However, the Committee submits the following comments:

- (1) The Committee is requesting additional information as to the category of "certification of licensure, registration or scores." The Committee is questioning under what circumstances the Board would "certify" an examination score. 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.
- (2) The fee report forms list a total estimated cost for each service based on a formula of staff time expended plus average administrative overhead. However, in all cases the proposed fee to be charged is rounded up to the nearest five dollar increment. The Committee is requesting an explanation as to why the proposed fees are rounded up, and are not the actual cost of services as estimated by the Board.
- (3) The administrative overhead costs for certification of scores, license or registration and verification of license or registration are listed as \$9.76 while all other services are listed as \$17.78. The Committee is requesting an explanation as to what accounts for the difference in administrative overhead costs.

House of Representatives  
Professional Licensure Committee  
September 1, 1999