

# Regulatory Analysis Form

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2003 AUG 26 AM 11:03

INDEPENDENT REGULATORY  
REVIEW COMMISSION

(1) Agency

Department of State, Bureau of Professional and  
Occupational Affairs, State Board of Optometry

(2) I.D. Number (Governor's Office Use)

16A-5211

IRRC Number: 2354

(3) Short Title

**Glaucoma Certification**

(4) PA Code Cite

49 Pa. Code § 23.82, 23.86, 23.91  
and 23.205

(5) Agency Contacts & Telephone Numbers

Primary Contact: **Teresa Lazo-Miller, Counsel**  
**State Board of Optometry (717) 783-7200**

Secondary Contact: **Joyce McKeever, Deputy Chief**  
**Counsel, Department of State (717) 783-7200**

(6) Type of Rulemaking (check one)

☒ Proposed Rulemaking  
☐ Final Order Adopting Regulation  
☐ Policy Statement

(7) Is a 120-Day Emergency Certification  
Attached?

☒ No  
Yes: By the Attorney General  
Yes: By the Governor

(8) Briefly explain the regulation in clear and nontechnical language.

The regulation provides for the application procedure for certification to treat glaucoma, pre-approves all continuing education courses offered by the American Academy of Ophthalmology and its state affiliates, and clarifies continuing education requirements for optometrists.

(9) State the statutory authority for the regulation and any relevant state or federal court decisions.

Section 3(b)(12) of the Optometric Practice and Licensure Act (Act), Act of June 6, 1980, P.L. 197, No. 57, as amended, 63 P.S. § 244.3(b)(12), authorizes the Board to approve continuing education for optometrists.

Section 3(b)(14) of the Act 63 P.S. § 244.3(b)(14), authorizes the Board to "promulgate all rules and regulations necessary to carry out the purposes of this act."

Section 4.2 of the Act, 63 P.S. § 244.4b, authorizes the Board to certify qualified optometrists to treat certain types of glaucoma.

### 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.

**The proposed amendments are not specifically mandated; however, the amendments are proposed to conform the Board's regulations to statutory amendments.**

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

**The public interest is served by having the Board's regulations conform to the Act. The public interest is served by providing an application and certification process to treat glaucoma.**

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

**Practitioners who do not meet the statutory requirements to treat glaucoma could practice outside their authorized scope of practice if the Board does not administer the certification to treat glaucoma. Practitioners who have not demonstrated they possess the qualifications may pose a risk to the public if they attempt to treat glaucoma.**

(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 general public will benefit from the proposed regulation, which ensures only qualified optometrists are certified to treat glaucoma.**

### 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 groups that will be adversely affected by the proposed regulation.**

(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.)

**All licensed optometrists who wish to become certified to treat glaucoma will be required to comply with the regulation. Approximately 1,545 optometrists currently hold therapeutic certification.**

(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.

**The Board discussed the proposed regulations with a representative of the Pennsylvania Optometric Association at the Board's December 17, 2002, meeting.**

(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 anticipates minimal costs to the regulated community. The application fee will be \$25. The Pennsylvania College of Optometry will be offering an 18-hour glaucoma course to meet the statutory requirements for approximately \$ 500.**

## Regulatory Analysis Form

(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.

**The Board anticipates no costs or savings to local governments associated with 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 anticipates no costs or savings to state governments associated with the regulation.**

### 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
<b>SAVINGS:</b>	\$	\$	\$	\$	\$	\$
Regulated Community	NA	NA	NA	NA	NA	NA
Local Government	NA	NA	NA	NA	NA	NA
State Government	NA	NA	NA	NA	NA	NA
Total Savings	NA	NA	NA	NA	NA	NA
<b>COSTS:</b>						
Regulated Community	440,000	300	300	0	0	0
Local Government	NA	NA	NA	NA	NA	NA
State Government	NA	NA	NA	NA	NA	NA
Total Costs	NA	NA	NA	NA	NA	NA
<b>REVENUE LOSSES:</b>						
Regulated Community	NA	NA	NA	NA	NA	NA
Local Government	NA	NA	NA	NA	NA	NA
State Government	NA	NA	NA	NA	NA	NA
Total Revenue Losses	NA	NA	NA	NA	NA	NA

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

The estimates above assume most therapeutically certified optometrists who must complete 18 hours of continuing education to qualify for certification to treat glaucoma will do so in the current fiscal year. The estimated cost for the continuing education is \$250.00. The cost of application for certification is \$25. Estimating 1,600 of the approximately 1,700 eligible licensees will apply for certification in the first year,  $[(1600 \times 25) + (1600 \times 250)] = 440,000$ . Thereafter, for the next two years, estimate is for 25 licensees.

### 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
State Board of Optometry expenditures	\$128,946.11	\$139,491.37	\$150,396.01	\$142,000.00

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

**The costs of complying with the regulation are mandated by statute; therefore, a cost benefit analysis is not applicable. However, the minimal costs to the regulated community are clearly outweighed by the benefit of having properly trained optometrists certified to treat glaucoma.**

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

**The amendments are a response to statutory changes. Therefore, no nonregulatory alternatives were considered.**

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

**No alternative regulatory schemes were considered.**

### Regulatory Analysis Form

(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 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?

**The proposed regulation is consistent with those of other states requiring continuing education for optometrists and will not place Pennsylvania at a competitive disadvantage. Some states have separate requirements for therapeutically certified optometrists, as does Pennsylvania. Pennsylvania is the 49<sup>th</sup> state to allow optometrists to treat certain types of glaucoma. Continuing education in therapeutics often relates to glaucoma. Delaware requires 12 hours of general CE biennially and an additional 12 hours biennially in "therapeutics and management of ocular disease." C.D.R. 2402100(10.1). Similarly, New Jersey requires 50 hours biennially for license renewal; for therapeutically certified optometrists, the requirement is 40 hours general CE plus 20 hours in "ocular pharmacology, ocular manifestation of systemic disease treatable by pharmacological agents or ocular pathology treatable by pharmacological agents." N.J.A.C. § 13:38-4.5. New York requires 36 hours triennially for optometrists who hold therapeutic certification, 8 N.Y.C.R.R. §§ 66.5(f)(1) and (2).**

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

**The regulation will not affect existing or proposed regulations of the Board.**

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

**The Board welcomes comments by interested parties at its meetings. Interested parties wishing to address a regulatory matter may contact the Board Administrator, Deborah Smith, at [optom@pados.state.pa.us](mailto:optom@pados.state.pa.us) or by calling 717-783-7155.**

### **Regulatory Analysis Form**

(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.

**The Board will maintain records of those optometrists who are certified to treat glaucoma.**

(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 not identified any affected groups with particular needs.**

(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 would be effective upon final publication in the Pennsylvania Bulletin.**

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

**The Board meeting dates for the remainder of 2003 are: March 12, May 14, July 10, September 10, and November 13.**



## FEE REPORT FORM

Agency: State - BPOA  
Contact: Scott J. Messing  
Phone No. 783-7194

Date: January 13, 2003

### Fee Title, Rate and Estimated Collections:

Application for Certification to treat Glaucoma: \$25.00  
Estimated Biennial Revenue: \$40,000 (1,600 applications x \$25.00)  
(First cycle only – thereafter 25 per biennial cycle = \$625.00)

### Fee Description:

The fee will be charged to every optometrists who applies for certification to treat glaucoma.

### Fee Objective:

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

### Fee-Related Activities and Costs:

Staff time-app prep & review	(0.50 hr)	12.52
Administrative Overhead:		<u>9.84</u>
Total Estimated Cost:		\$ 22.36
Proposed Fee:		\$ 25.00

### Analysis, Comment, and Recommendation:

It is recommended that a fee of \$25.00 be established to process an application for certification to treat glaucoma.

Page 2: **Application for Certification to Treat Glaucoma:** January 13, 2003

Board Staff: receives application from licensee requesting certification to treat glaucoma; reviews application and supporting documents to be certain that all requirements are met, verifies status of Optometry license, issues license through computer or discrepancy notice.

CDL-1

FACE SHEET  
FOR FILING DOCUMENTS  
WITH THE LEGISLATIVE REFERENCE BUREAU

(Pursuant to Commonwealth Documents Law)

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INDEPENDENT REGULATORY  
REVIEW COMMISSION

DO NOT WRITE IN THIS SPACE

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

*Christina L. Cooper*  
(DEPUTY ATTORNEY GENERAL)

JUL 22 2003

DATE OF APPROVAL

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

State Board of Optometry  
(AGENCY)

DOCUMENT/FISCAL NOTE NO. 16A-5211

DATE OF ADOPTION:

BY *Steven Reto, O.D.*  
Steven Reto, O.D.

TITLE: Chairperson  
(EXECUTIVE OFFICER, CHAIRMAN OR SECRETARY)

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

*David J. Doherty*  
BY

6/30/03

DATE OF APPROVAL

Executive

(Deputy General Counsel  
(Chief Counsel,  
Independent Agency  
~~State Inapplicable~~  
title)

- [ ] Check if applicable  
Copy not approved.  
Objections attached.  
[ ] Check if applicable. No Attorney  
General approval or  
objection within 30 day  
after submission.

PROPOSED RULEMAKING  
COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF STATE  
BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS  
STATE BOARD OF OPTOMETRY  
49 PA. CODE, §§ 23.82, 23.86, 23.91 and 23.205  
CONTINUING EDUCATION, FEES, CERTIFICATION TO TREAT GLAUCOMA

The State Board of Optometry (Board) proposes to amend 49 Pa. Code §§ 23.82 and 23.86 (relating to continuing education), § 23.91 (relating to fees) and to add § 23.205 (relating to application procedure for certification to treat glaucoma) as set forth in Annex A.

### **Effective Date**

The regulation would be effective upon publication of final-form rulemaking in the Pennsylvania Bulletin and would apply to continuing education credits earned during the 2002 - 2004 biennial renewal period.

### **Statutory Authority**

Section 3(b)(12) of the Optometric Practice and Licensure Act (Act), Act of June 6, 1980, P.L. 197, No. 57, as amended (63 P.S. § 244.3(b)(12)) authorizes the Board to approve continuing education. Section 3(b)(14) of the Act (63 P.S. § 244.3(b)(14)), authorizes the Board to “promulgate all rules and regulations necessary to carry out the purposes of this act.” Section 4.2 of the Act 255 of 2002 (63 P.S. § 244.4b) authorizes the Board to certify licensees to treat glaucoma.

### **Background and Need for Amendment**

By Act 225 of 2002, the General Assembly amended the Act to provide for therapeutically certified optometrists to be certified to treat certain types of glaucoma. As the state agency charged with approving the qualifications of optometrists, the Board proposes to adopt an application procedure for the certification to treat glaucoma. The proposed regulation would conform the Board’s continuing education requirements to the continuing education requirements set forth in § 4.2 of Act 225 of 2002 (63 P.S. § 244.4b). In addition, the proposed rulemaking would add the American Academy of Ophthalmology and its state affiliates to the list of pre-approved providers of optometric continuing education; and would provide for an application procedure and fee related to certification to treat certain types of glaucoma.

### **Description of Proposed Amendments**

Act 225 of 2002 authorizes the Board to certify therapeutically-certified optometrists to treat certain types of glaucoma. Optometrists who obtained therapeutic certification under section 4.1(a)(2) of the Act must also complete 18 hours of continuing education in glaucoma to obtain certification to treat glaucoma. Section 23.205 of the Board’s proposed regulations mirrors these

statutory requirements.

Act 225 of 2002 also provided that, in order to continue to treat glaucoma, optometrists certified to treat glaucoma must obtain 4 hours in the study of the prescription and administration of pharmaceutical agents for the treatment of glaucoma biennially. Section 23.82 of the Board's proposed regulations mirrors this requirement. In addition, because continuing education in glaucoma is a subset of continuing education in therapeutics, the Board's proposed regulation clarifies that the 4 hours taken in the treatment of glaucoma may be applied toward the 6 hours required to maintain therapeutic certification. Finally, because 18 hours of continuing education are required of applicants who were therapeutically certified under section 4.1(a)(2) of the Act, the Board's proposed regulation clarifies that those 18 hours shall apply to the 30-hour continuing education requirement for the biennial period in which the hours are completed, including the 6-hour requirement in therapeutics and the 4-hour requirement in glaucoma.

Section 23.86 of the Board's proposed regulations adds the American Academy of Ophthalmology and its state affiliates to the list of pre-approved providers of optometric continuing education because these organizations consistently offer high-quality continuing education courses relevant to the practice of optometry.

Section 23.91 of the Board's proposed regulations provides for the fee for administrative processing of the application for certification to treat glaucoma. The fee is based on actual staff time to process the application and provide for printing and mailing a license indicating the optometrist is certified to treat glaucoma.

#### **Compliance with Executive Order 1996-1**

Because the proposed amendments effectuate amendments to the Act, the Board did not send the text of the proposed regulation to interested parties for the pre-draft comment. The proposed regulations were developed at an open meeting of the Board on December 17, 2002, and comments were received from the Executive Director of the Pennsylvania Optometric Association.

#### **Fiscal Impact and Paperwork Requirements**

The proposed amendments should have only minimal fiscal impact on licensees, who will be required to pay an application fee and may be required to complete 18 hours of continuing education on glaucoma to obtain certification to treat glaucoma. There is no fiscal impact on the Board, the private sector, the general public or any political subdivisions. The proposed amendments will create only minimal additional paperwork for the Board in processing applications to treat glaucoma and will not create additional paperwork for the private sector.

### **Sunset Date**

The Board continuously monitors its regulations. Therefore, no sunset date has been assigned.

### **Regulatory Review**

Under section 5(a) of the Regulatory Review Act (71 P.S. § 745.5(a)), the Commission/Board submitted a copy of this proposed regulation on August 26, 2003, to the Independent Regulatory Review Commission (IRRC), the Senate Consumer Protection and Professional Licensure Committee and the House Professional Licensure Committee. In addition to submitting the proposed rulemaking, the Commission/Board has provided IRRC and the committees with a copy of a detailed Regulatory Analysis Form prepared by the Commission/Board. A copy of this material is available to the public upon request.

Under section 5(g) of the Regulatory Review Act (71 P.S. § 745.5(g)), if IRRC has comments, recommendations or objections regarding any portion of the proposed rulemaking, it will notify the Commission/Board approximately 30 days from the close of the public comment period. The notification will specify the regulatory review criteria that have not been met. The Regulatory Review Act specifies detailed procedures for review of comments, recommendations and objections by the Commission/Board, the General Assembly, and the Governor prior to publication of the regulations.

### **Public Comment**

Interested persons are invited to submit written comments, recommendations, or objections regarding this proposed rulemaking to Deborah Smith, Board Administrator, State Board of Optometry, P.O. Box 2649, Harrisburg, PA, 17105, within 30 days following publication of this proposed rulemaking in the *Pennsylvania Bulletin*.

Steven J. Reto, O.D.  
Chairperson, State Board of Optometry

ANNEX A

TITLE 49. PROFESSIONAL AND VOCATIONAL STANDARDS

PART I. DEPARTMENT OF STATE

SUBPART A. PROFESSIONAL AND OCCUPATIONAL AFFAIRS

CHAPTER 23. STATE BOARD OF OPTOMETRY

\* \* \*

CONTINUING EDUCATION

\* \* \*

**§ 23.82. Continuing education hour requirements.**

(a) An applicant for biennial license renewal or reactivation of license is required to complete, during the 2 years preceding renewal or reactivation, a minimum of 30 hours of continuing education. For licensees certified in accordance with section 4.1 of the act (63 P.S. § 244.4a) [and §§ 23.201 and 23.202] (relating to certification to prescribe and administer pharmaceutical agents for therapeutic purposes [qualifications for certification; and application procedure]), at least 6 of the required 30 hours shall concern the prescription and administration of pharmaceutical agents for therapeutic purposes. For licensees certified in accordance with section 4.2 of the act (63 P.S. § 244.4b) (relating to additional requirements to prescribe and

administer pharmaceutical agents for the treatment of certain types of glaucoma), at least 4 of the 30 hours shall concern the prescription and administration of pharmaceutical agents for the treatment of glaucoma. The 4 hours taken in the treatment of glaucoma may be applied toward the 6 hours required to maintain therapeutic certification; however, all licensees shall complete at least 30 total hours. Completion of a Board-approved course described in section 4.1(a)(2) of the act (63 P.S. § 244.4a(a)(2)) [§ 23.201(b)(1)(Reserved)] or continuing education described in section 4.2 of the act (63 P.S. § 244.4b) shall satisfy the continuing education requirement for the biennial renewal period in which it is completed-, including the 6-hour requirement in therapeutics and the 4-hour requirement in glaucoma.

\* \* \*

**§ 23.86. Sources of continuing education hours.**

(a) In addition to another provider which wishes to secure approval from the Board, the Board finds that the following providers have currently met the standards for provider approval for all acceptable courses of continuing education; accordingly, the following providers have program approval in all allowable areas for continuing education: the American Optometric Association, The Pennsylvania Optometric Association, all Board-accredited schools and colleges of optometry, the Optometric Extension Program, [and] The American Academy of Optometry and its state affiliates, and the American Academy of Ophthalmology and its state affiliates. The approval given to these providers is subject to reevaluation; however a rescission of



provider or program approval will be made only in accordance with 1 Pa. Code Part II (relating to general rules of administrative practice and procedure).

\* \* \*

## FEES

### § 23.91. Fees.

The following is the schedule of fees for services charged by the Board:

License application.....	\$25
Certified copy of license for each additional practice location.....	\$20
Certification of scores or licensure, or both.....	\$25
Verification of licensure.....	\$15
Biennial renewal – optometrist license.....	\$135
Biennial renewal – certified copy of license for each additional practice location.....	\$20
Application for certification to prescribe and administer pharmaceutical agents for therapeutic purposes.....	\$25
Application for continuing education program approval.....	\$45
<u>Application for certification to treat glaucoma.....</u>	<u>\$25</u>

\* \* \*

**CERTIFICATION TO TREAT GLAUCOMA**

**§ 23.205. Application procedure.**

An applicant for certification to treat glaucoma under section 4.2 of the act (63 P.S. § 244.4b) shall submit to the Board a completed application obtained from the Board together with the certification fee required by § 23.91 (relating to fees), and one of the following.

(1) A signed verification attesting that the licensee obtained therapeutic certification by passing the licensure examination to practice optometry which examination included the prescription and administration of pharmaceutical agents for therapeutic purposes (the examination required for therapeutic certification under section 4.1(a)(1) of the act (63 P.S. § 244.4a(a)(1))). The verification shall state the month and year the licensee passed this examination.

(2) A signed verification attesting that the licensee obtained therapeutic certification by passing an examination on the prescription and administration of pharmaceutical agents for therapeutic purposes (the examination required for therapeutic certification under section 4.1(a)(2) of the act (63 P.S. § 244.4a(a)(2))) and certificates of attendance from Board-approved continuing education courses demonstrating at least 18 hours in glaucoma, completed since December 19, 2002.



**COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF STATE  
BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS  
STATE BOARD OF OPTOMETRY**

**Post Office Box 2649  
Harrisburg, Pennsylvania 17105-2649  
(717) 783-7155**

August 26, 2003

The Honorable John R. McGinley, Jr., Chairman  
INDEPENDENT REGULATORY REVIEW COMMISSION  
14<sup>th</sup> Floor, Harristown 2, 333 Market Street  
Harrisburg, Pennsylvania 17101

Re: Proposed Regulation  
State Board of Optometry  
16A-5211: Continuing Education, Fees, Certification to Treat Glaucoma

Dear Chairman McGinley:

Enclosed is a copy of a proposed rulemaking package of the State Board of Optometry pertaining to continuing education, fees, and certification to treat glaucoma.

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

Sincerely,

  
Steven J. Reto, Chairperson  
State Board of Optometry

SJR/TLM/kmh

Enclosure

cc: Scott J. Messing, Deputy Commissioner  
Bureau of Professional and Occupational Affairs  
Andrew Sislo, Chief Counsel  
Department of State  
Joyce McKeever, Deputy Chief Counsel  
Department of State  
Cynthia Montgomery, Regulatory Counsel  
Department of State  
Herbert Abramson, Senior Counsel in Charge  
Department of State  
Teresa Lazo-Miller, Counsel  
State Board of Optometry  
State Board of Optometry

**TRANSMITTAL SHEET FOR REGULATIONS SUBJECT TO THE  
REGULATORY REVIEW ACT**

I.D. NUMBER: 16A-5211

SUBJECT: Continuing Education, Fees, Certification to Treat Glaucoma

AGENCY: DEPARTMENT OF STATE

**TYPE OF REGULATION**

- X Proposed Regulation
- 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

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**FILING OF REGULATION**

DATE	SIGNATURE	DESIGNATION
8/26/03	<i>Sandra J. Harper</i>	HOUSE COMMITTEE ON PROFESSIONAL LICENSURE
8/26/03	<i>Mary Walmer</i>	SENATE COMMITTEE ON CONSUMER PROTECTION & PROFESSIONAL LICENSURE
8/26/03	<i>Elena Pagan</i>	INDEPENDENT REGULATORY REVIEW COMMISSION
		ATTORNEY GENERAL (for Final Omitted only)
8/26/03	<i>C. Lee</i>	LEGISLATIVE REFERENCE BUREAU (for Proposed only)

July 23, 2003