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DRN
Disability Rights Network
of Pennsylvania

1414 N. Cameron St., Suite C, Harrisburg, PA 17103

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2010 FEB 22 PM 1:14

INDEPENDENT REGULATORY
REVIEW COMMISSION

VIA E-MAIL – irrc@irrc.state.pa.us

February 22, 2010

Kim Kaufman
Executive Director
Independent Regulatory Review Commission
333 Market Street
14th floor
Harrisburg, PA 17101

Re: Additional Comments on Proposed Pre-Need Regulations 16A-4816

Dear Mr. Kaufman:

The Disability Rights Network of Pennsylvania (DRN) submits these comments on the Proposed Rulemaking on Pre-Need Activities of Unlicensed Employees. DRN is the organization designated by the Commonwealth pursuant to federal law to advocate for and protect the rights of Pennsylvanians with disabilities.

In a letter to you dated November 16, 2009, DRN previously expressed its opposition to the proposed pre-need regulations. It is my understanding that, since that time, some changes have been made to the proposed regulations and that the IRRC once again is considering taking action.

Protecting and advancing the rights of people with disabilities

The Philadelphia Building
1315 Walnut St. Suite 500
Philadelphia, PA 19107

429 Fourth Avenue
Suite 701
Pittsburgh, PA 15219

1-800-692-7443 (Voice) 1-877-375-7139 (TDD) info@drnpa.org (Email)

I am writing again to make clear that the recent changes do not alleviate the concerns DRN previously expressed. Thus, for the reasons stated in DRN's November 16, 2009 letter, DRN continues to oppose the proposed pre-need regulations. Given the significant potential for negative impact on Pennsylvanians with disabilities, I ask that you consider DRN's comments and recommendations prior to finalization of these proposed regulations.

Thank you for consideration of DRN's views. If you have any questions or wish to discuss these issues further, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'Ilene W. Shane', is written over a horizontal line.

Ilene W. Shane
Chief Executive Officer

MJM

2639

RECEIVED

From: Do, Lan [ldo@drnpa.org]
Sent: Monday, February 22, 2010 11:43 AM
To: IRRRC
Cc: Murphy, Mark
Subject: Comments on Proposed Pre-Need Regulation 16A-4816
Attachments: Kim Kaufman letter.pdf

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INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Mr. Kaufman:

I am submitting DRN's comments on the proposed pre-need regulation 16A-4816 on behalf of our CEO. The hardcopy will go in the mail today. Please feel free to contact our CEO at extension 302 if you have any questions or would like to discuss this further. Thank you.

Lan Do,
Executive Assistant
Disability Rights Network of PA
1414 N. Cameron Street, Suite C
Harrisburg, PA 17103
1-800-692-7443 x312
ldo@drnpa.org