

MICHAEL PATRICK McGEEHAN

PROFESSIONAL LICENSURE COMMITTEE  
MAJORITY CHAIRMAN



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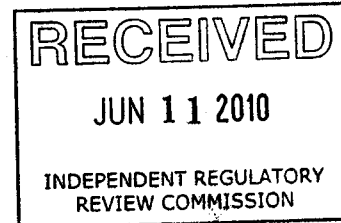
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House of Representatives  
COMMONWEALTH OF PENNSYLVANIA  
HARRISBURG

2844

June 9, 2010

Mr. Kim Kaufman  
Executive Director  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101



RE: Proposed Regulation  
State Board of Veterinary Medicine  
16A-51 – Civil Penalties

Dear Mr. Kaufman:

**RECOMMENDATION:** It is recommended the House Professional Licensure Committee take no formal action until final regulations are promulgated and submit the following comments:

1. The Committee recommends that the sections of this proposed regulation be re-organized so that each section remains consistent with the previously stated profession.
2. The Committee requests information on how the Board monitors the civil penalty time periods to ensure compliance with the proposed regulation
3. The Committee questions the need for adding a new civil penalty time period of 25-30 months and requests an explanation on how the Board determined the amount of a civil penalty for practicing on a lapsed license.
4. The Committee requests an explanation on why a category of failing to display a current certificate for CVTs with civil penalty is not included.

Sincerely,

A handwritten signature in cursive script that reads "Mike McGeehan".

Michael P. McGeehan  
Chairman, House Professional Licensure Committee