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## House of Representatives

Commonwealth of Pennsylvania  
Harrisburg

June 13, 2012

### COMMITTEES

PROFESSIONAL LICENSURE,  
MAJORITY CHAIR

CONSUMER AFFAIRS

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David Sumner, Executive Director  
Independent Regulatory Review Commission  
14<sup>th</sup> Floor, Harristown 2, 333 Market Street  
Harrisburg, PA

Dear Mr. Sumner,

Today the House Professional Licensure Committee voted to take no formal action on Proposed Regulation 16A-5321 of the State Board of Osteopathic Medicine until final regulation is promulgated and to submit the following comments:

1. The Committee brings to the Board's attention that proposed Regulation 16A-5321 was published in the May 12, 2012, issue of the *Pennsylvania Bulletin*, approximately two (2) years and eight (8) days past the eighteen (18) months from the effective date of Act 46 of 2008 requirement.
2. The Committee brings to the Board's attention that proposed Regulation 16A-5321 implementing Act 56 of 2004 is rather untimely.
3. The Committee brings to the Board's attention that with the deletion of CRTT in §25.502 Definitions, 49 Pa. Code §25.506(b), Temporary Permits, which is not in the proposed regulation, should be amended. "Credentialing examination" should replace CRTT as is done in §25.507(1)(i).

Sincerely,

Julie Harhart, Majority Chair  
House Professional Licensure Committee

JH/mmgw

Cc: Wayne Crawford, Committee Executive Director  
Sharon Engdahl, Committee Analyst

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