

INDEPENDENT REGULATORY
REVIEW COMMISSION

2012 AUG 28 PM 2:46

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Regulatory Analysis Form

(Completed by Promulgating Agency)

(All Comments submitted on this regulation will appear on IRRC's website)

(1) Agency:
Department of State, Bureau of Professional and Occupational Affairs, State Board of Social Workers, Marriage and Family Therapists and Professional Counselors

(2) Agency Number: 16A
Identification Number: 6918

IRRC Number: 2973

(3) PA Code Cite: 49 Pa. Code §§ 47.37, 48.38 and 49.38

(4) Short Title: **Continuing Education Audit and Enforcement**

(5) Agency Contacts (List Telephone Number and Email Address):

Primary Contact: **Cynthia Montgomery, Regulatory Counsel, Department of State, P.O. Box 2649, Harrisburg, PA 17105-2649; phone 717-783-7200; fax 787-0251; email: cymontgome@pa.gov.**

Secondary Contact: **Beth Michlovitz, Board Counsel, State Board of Social Workers, Marriage and Family Therapists and Professional Counselors, P.O. Box 2649, Harrisburg, PA 17105-2649; phone: 717-783-7200; fax: 787-0251 email: bmichlovit@pa.gov.**

(6) Type of Rulemaking (check applicable box):

PROPOSED REGULATION

Final Regulation

Final Omitted Regulation

Emergency Certification Regulation;

Certification by the Governor

Certification by the Attorney General

(7) Briefly explain the regulation in clear and nontechnical language. (100 words or less)

The amendments clarify that the Board will audit licensees to ensure compliance with the continuing education requirements and to require that licensees who, as a result of audit, are determined to be deficient in acceptable continuing education hours make up the deficiency notwithstanding any disciplinary action taken by the Board. The amendments will allow the Board to make effective use of the Act 48 citation process for continuing education violations.

(8) State the statutory authority for the regulation. Include specific statutory citation.

Section 18(a) of the Social Workers, Marriage and Family Therapists and Professional Counselors Act (63 P.S. § 1918(a)) authorizes the Board to promulgate regulations relating to continuing education.

(9) Is the regulation mandated by any federal or state law or court order, or federal regulation? Are there any relevant state or federal court decisions? If yes, cite the specific law, case or regulation as well as, any deadlines for action.

The regulation is not mandated by any federal or state law or court order or federal regulation.

(10) State why the regulation is needed. Explain the compelling public interest that justifies the regulation. Describe who will benefit from the regulation. Quantify the benefits as completely as possible and approximate the number of people who will benefit.

The regulation is needed to clarify the continuing education audit and enforcement procedures and to allow the Board to make efficient use of the Act 48 citation process for continuing education procedures. Historically, a continuing education violation required formal administrative proceedings, and when the Board determined that a continuing education violation had occurred, it would issue an order imposing a monetary civil penalty and ordering the deficiency to be made up within 6 months. It is necessary to codify this practice in order to make use of the more streamlined citation process and still assure that all continuing education violations are remedied in a timely manner. All licensees will benefit from the clarification to the regulations, and those licensees whose disciplinary matters may be handled through the Act 48 process will benefit by the less burdensome process. There are approximately 6,829 licensed social workers, 4,595 licensed clinical social workers, 440 licensed marriage and family therapists, and 4,457 licensed professional counselors. It is impossible to determine how many of these may violate the continuing education regulations and be subject to discipline.

(11) If data is the basis for this regulation, please provide a description of the data, explain in detail how the data was obtained, and how it meets the acceptability standard for empirical, replicable and testable data that is supported by documentation, statistics, reports, studies or research. Please submit data or supporting materials with the regulatory package. If the material exceeds 50 pages, please provide it in a searchable electronic format or provide a list of citations and internet links that, where possible, can be accessed in a searchable format in lieu of the actual material. If other data was considered but not used, please explain why that data was determined not to be acceptable.

No scientific data, studies or references were used to justify the regulation.

(12) Describe who and how many people will be adversely affected by the regulation. How are they affected?

The Commissioner has not identified any group that would be adversely affected by the regulation.

(13) 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.

The regulation would affect all licensed social workers, licensed clinical social workers, licensed marriage and family therapists, and licensed professional counselors who are required to complete continuing education. At present there are approximately 6,829 licensed social workers, 4,595 licensed clinical social workers, 440 licensed marriage and family therapists, and 4,457 licensed professional counselors.

(14) 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. Explain how the dollar estimates were derived.

The regulation would not impose additional costs on the regulated community because the regulation merely clarifies/modifies the continuing education audit and enforcement procedures. The regulated community may realize some savings, in the form of less time spent on paperwork and reduced legal fees, from the streamlined Act 48 procedures in the event of alleged continuing education violations. These estimated savings cannot be quantified.

(15) 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. Explain how the dollar estimates were derived.

The regulation would not result in costs or savings to local government.

(16) 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. Explain how the dollar estimates were derived.

The regulation would cause the Board and BPOA's Prosecution and Counsel Divisions to spend less time – and thus incur fewer costs – on enforcement actions involving those continuing education violations that can now be processed through the Act 48 citation procedures. These estimated savings cannot be quantified because it depends on variables such as how many citations are issued, how many respondents simply pay the citation without requesting a hearing, how many hearings are requested and conducted, and how many decisions are appealed to the board. When a respondent admits the violation and simply pays the citation, it costs the agency less than \$250 to process the citation from the opening of the matter to conclusion. A formal disciplinary action can cost the agency thousands of dollars.

(17) 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
SAVINGS:	\$	\$	\$	\$	\$	\$
Regulated Community	See (14)	See (14)	See (14)	See (14)	See (14)	See (14)
Local Government						
State Government	See (16)	See (16)	See (16)	See (16)	See (16)	See (16)
Total Savings						
COSTS:						
Regulated Community						
Local Government						
State Government						
Total Costs	N/A	N/A	N/A	N/A	N/A	N/A
REVENUE LOSSES:						
Regulated Community						
Local Government						
State Government						
Total Revenue Losses	N/A	N/A	N/A	N/A	N/A	N/A

(17a) Provide the past three year expenditure history for programs affected by the regulation.

Program	FY -3 2008-2009	FY -2 2009-2010	FY -1 2010-2011	Current FY 2011-2012 (projected)
State Board of Social Workers, Marriage and Family Therapists and Professional Counselors	\$747,029.47	\$682,504.57	\$709,516.54	\$790,000.00

(18) Explain how the benefits of the regulation outweigh any cost and adverse effects.

The regulation clarifies/modifies the continuing education audit and enforcement process at no cost to the public at large and with likely savings for BPOA, the Board and the regulated community.

(19) Describe the communications with and input from the public and any advisory council/group in the development and drafting of the regulation. List the specific persons and/or groups who were involved.

The proposal was discussed at public meetings of the Board throughout 2011, which are routinely attended by professional associations who represent the regulated community and other organizations who have an interest in the regulatory agenda of the Board. In formulating the proposal, the Board shared drafts with and considered input from the Executive Director of the National Association of Social Workers – Pennsylvania Chapter. In addition, the Board invites the major professional organizations that represent the regulated community to submit comments following publication of the notice of proposed rulemaking.

(20) Include a description of any alternative regulatory provisions which have been considered and rejected and a statement that the least burdensome acceptable alternative has been selected.

No alternative regulatory provisions were considered. The Board believes the revisions will permit the use of a less burdensome process under Act 48 to handle continuing education violations.

(21) 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 regulations.

There are no federal standards applicable to the subject matter of the regulation.

(22) How does this regulation compare with those of other states? How will this affect Pennsylvania's ability to compete with other states?

The regulation would not put Pennsylvania at a competitive disadvantage with other states. All states are empowered to impose disciplinary sanctions, including fines or civil penalties, against those who violate licensing statutes and regulations, including continuing education violations. A review of the surrounding states indicates that Delaware, Maryland and Virginia enforce their continuing education requirements for social workers through random audit similar to Pennsylvania. None of the surrounding states appear to have process akin to the Act 48 citation process.

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

The regulation is referenced in the Commissioner's proposed rulemaking relating to Schedule of Civil Penalties – Social Workers, Marriage and Family Therapists and Professional Counselors (#16A-6917). The regulation would not affect existing or proposed regulations of any other state agency.

(24) Submit a statement of legal, accounting or consulting procedures and additional reporting, recordkeeping or other paperwork, including copies of forms or reports, which will be required for implementation of the regulation and an explanation of measures which have been taken to minimize these requirements.

The regulation may reduce the overall amount of paperwork associated with disciplinary proceedings relating to continuing education violations for those violations could now be handled more efficiently through the Act 48 citation process. The regulation would not alter reporting requirements or accounting and consulting procedures.

(25) 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 regulation would apply uniformly to all licensees of the Board that are required to complete continuing education. No special provisions have been developed for any affected groups or persons.

(26) Include a schedule for review of the regulation including:

A. The date by which the agency must receive public comments: **Within 30 days of publication as proposed.**

B. The date or dates on which public meetings or hearings will be held: **No public hearings are scheduled. The Board discusses its regulatory proposals at monthly meetings usually held on the second Tuesday of each month.**

C. The expected date of promulgation of the proposed regulation as a final-form regulation: **Summer of 2012.**

D. The expected effective date of the final-form regulation: **Upon publication as final.**

E. The date by which compliance with the final-form regulation will be required: **Upon publication as final.**

F. The date by which required permits, licenses or other approvals must be obtained: **N/A**

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

The Board continually reviews the efficacy of its regulations, as part of its annual review process under Executive Order 1996-1. The Board reviews its regulatory proposals at regularly scheduled public meetings, generally the second Tuesday of each month. More information can be found on the Department's website (www.dos.state.pa.us).

FACE SHEET
FOR FILING DOCUMENTS
WITH THE LEGISLATIVE REFERENCE BUREAU

2012 AUG 28 PM 2:46

(Pursuant to Commonwealth Documents Law)

DO NOT WRITE IN THIS SPACE

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



BY: _____
(DEPUTY ATTORNEY GENERAL)

AUG 28 2012

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 Social Workers, Marriage and Family
Therapists and Professional Counselors
(AGENCY)

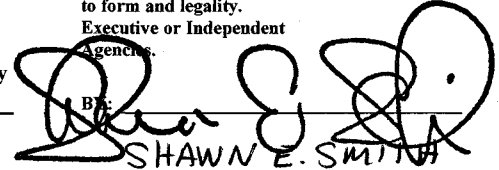
DOCUMENT/FISCAL NOTE NO. 16A-6918

DATE OF ADOPTION: _____

BY: 
Donna A. Tonrey, LMFT

TITLE: Chairperson
(EXECUTIVE OFFICER, CHAIRMAN OR SECRETARY)

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



BY: _____
SHAWNE E. SMITH

AUG 01 2012

DATE OF APPROVAL

Deputy General Counsel,
~~Chief Counsel,~~
~~Independent Agency~~
(Strike inapplicable title)

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

NOTICE OF PROPOSED RULEMAKING

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE
BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS
STATE BOARD OF SOCIAL WORKERS, MARRIAGE AND FAMILY
THERAPISTS AND PROFESSIONAL COUNSELORS
49 PA. CODE, CHAPTERS 47, 48 AND 49
§§ 47.37, 48.38 and 49.38

CONTINUING EDUCATION AUDIT AND ENFORCEMENT

The State Board of Social Workers, Marriage and Family Therapists and Professional Counselors (Board) hereby proposes to amend §§ 47.37, 48.38 and 49.38 (relating to reporting by licensees of hours spend in continuing education), to read as set forth in Annex A.

Statutory authority

Section 18 (a) of the Social Workers, Marriage and Family Therapists and Professional Counselors Act (63 P.S. § 1918(a)) authorizes the Board to promulgate regulations relating to continuing education.

Background and Purpose

The Board has determined that to be more efficient and cost-effective in handling certain classes of disciplinary matters, including those relating to some continuing education violations, the Board should make use of the citation process provided by section 5(a) of the act of July 2, 1993 (P.L. 345, No. 48) (Act 48) (63 P.S. § 2205(a)). A companion rulemaking being promulgated by the Commissioner of Professional and Occupational Affairs would set forth a schedule of civil penalties to allow agents of the Bureau of Professional and Occupational Affairs (Bureau) to issue citations imposing monetary civil penalties for continuing education violations involving deficiencies of 10 hours or less. Violations of more than 10 hours would still be handled through formal disciplinary proceedings. Historically, when the Board determined a continuing education violation had occurred, it would issue an order imposing discipline and directing that the deficiency be made up within 6 months. The Board has now determined that it is necessary to codify this practice in order to be able to make use of the more streamlined citation process, and still assure that all continuing education deficiencies are remedied in a timely manner.

Description of the Amendments

Sections 47.37, 48.38 and 49.38 are being amended to clarify that the Board will audit licensees to ensure compliance with the continuing education requirements. A licensee who, as a result of that audit, is determined to be deficient in acceptable continuing education hours will be subject to disciplinary action, either through formal disciplinary proceedings or through the issuance of a citation. These sections are also being amended to provide that all continuing education deficiencies identified through the audit must be made up within 6 months from the issuance of a warning letter or citation, or the imposition of discipline. Hours of continuing education used to make up for a deficiency may not be used to satisfy the continuing education requirement for the current biennium. Finally, amendments are proposed to clarify that the failure to make up all deficiencies within that timeframe will subject a licensee to additional disciplinary action.

Fiscal impact and Paperwork Requirements

The proposal should not result in any additional legal, accounting or reporting requirements for the Commonwealth or the regulated community.

Sunset Date

The Board continuously monitors the effectiveness of its regulations on a fiscal year and biennial basis. Therefore, no sunset date has been assigned.

Regulatory Review

Under section 5(a) of the Regulatory Review Act (71 P.S. § 745.5(a)), on August 28, 2012, the Board submitted a copy of this proposed regulation and a copy of a Regulatory Analysis form to the Independent Regulatory Review Commission (IRRC) and to the Chairpersons of the Senate Consumer Protection and Professional Licensure Committee and the House Professional Licensure Committee. A copy of this material is available to the public upon request.

Under section 5(g) of the Regulatory Review Act, IRRC may convey any comments, recommendations or objections to the proposed rulemaking within 30 days of the close of the public comment period. Comments, recommendations or objections shall specify the regulatory review criteria which have not been met. The Regulatory Review Act specifies detailed procedures for review, prior to final publication of the rulemaking, by the Board, the General Assembly, and the Governor of comments, recommendations or objections raised.

Public Comment

Interested persons are invited to submit written comments, suggestions or objections regarding this proposed rulemaking to Cynthia K. Montgomery, Regulatory Counsel, State Board of Social Workers, Marriage and Family Therapists and Professional Counselors, P. O. Box 2649, Harrisburg, PA 17105-2649, within 30 days of publication of this proposed rulemaking in the *Pennsylvania Bulletin*. Please reference No. 16A-6918, Continuing Education Audit and Enforcement, when submitting comments.

Donna A. Tonrey, LMFT
Chairperson

ANNEX A

TITLE 49. PROFESSIONAL AND VOCATIONAL STANDARDS

PART I. DEPARTMENT OF STATE

Subpart A. PROFESSIONAL AND OCCUPATIONAL AFFAIRS

CHAPTER 47. STATE BOARD OF SOCIAL WORKERS, MARRIAGE AND

FAMILY THERAPISTS AND PROFESSIONAL COUNSELORS

* * * * *

CONTINUING EDUCATION

* * * * *

§ 47.37. Reporting by licensee of hours spent in continuing education; continuing education audit and enforcement.

* * * * *

(b) The Board will randomly audit licensees to ensure compliance with the continuing education requirements. A licensee selected for audit shall provide information to document the licensee's [certification] completion of required continuing education, which information shall include the following:

* * * * *

(c) A licensee who, as a result of an audit, is determined to be deficient in continuing education hours will be subject to formal disciplinary action under section 11 of the act (63 P.S. § 1911), or will be subject to the issuance of a citation under section 5(a) of the act of July 2, 1993 (P.L. 345, No. 48) (63 P.S. § 2205(a)).

(d) Notwithstanding other action taken as set forth in subsection (c), a licensee who is determined to be deficient in continuing education hours is required to make up all deficient hours of continuing education and submit documentation containing the information set forth in subsection (b) to the Board within 6 months from the issuance of a warning letter, the issuance of a citation, or the imposition of discipline. Hours of continuing education submitted to the Board to make up for a deficiency may not be used by the licensee to satisfy the continuing education requirement for the current biennium.

(e) Failure to make up all deficiencies as set forth in subsection (d) will subject the licensee to additional disciplinary action under section 11 of the act.

* * * * *

**CHAPTER 48. STATE BOARD OF SOCIAL WORKERS, MARRIAGE AND
FAMILY THERAPISTS AND PROFESSIONAL COUNSELORS – LICENSURE
OF MARRIAGE AND FAMILY THERAPISTS**

* * * * *

CONTINUING EDUCATION

* * * * *

§ 48.38. Reporting by licensee of hours spent in continuing education; continuing education audit and enforcement.

(b) The Board will randomly audit licensees to ensure compliance with the continuing education requirements. A licensee selected for audit shall provide information to document the licensee's [certification] completion of required continuing education. The information must include the following:

* * * * *

(c) A licensee who, as a result of an audit, is determined to be deficient in continuing education hours will be subject to formal disciplinary action under section 11 of the act (63 P.S. § 1911) or will be subject to the issuance of a citation under section 5(a) of the act of July 2, 1993 (P.L. 345, No. 48) (63 P.S. § 2205(a)).

(d) Notwithstanding other action taken as set forth in subsection (c), a licensee who is determined to be deficient in continuing education hours is required to make up all deficient hours of continuing education and submit documentation containing the information set forth in subsection (b) to the Board within 6 months from the issuance of a warning letter, the issuance of a citation, or the imposition of discipline. Hours of continuing education submitted to the Board to make up for a deficiency may not be used by the licensee to satisfy the continuing education requirement for the current biennium.

(e) Failure to make up all deficiencies as set forth in subsection (d) will subject the licensee to further disciplinary action under section 11 of the act.

* * * * *

**CHAPTER 49. STATE BOARD OF SOCIAL WORKERS, MARRIAGE AND
FAMILY THERAPISTS AND PROFESSIONAL COUNSELORS – LICENSURE
OF PROFESSIONAL COUNSELORS**

* * * * *

CONTINUING EDUCATION

* * * * *

§ 49.38. Reporting by licensee of hours spent in continuing education; continuing education audit and enforcement.

* * * * *

(b) The Board will randomly audit licensees to ensure compliance with the continuing education requirements. A licensee selected for audit shall provide information to document the licensee's [certification] completion of required continuing education. The information must include the following:

* * * * *

(c) A licensee who, as a result of an audit, is determined to be deficient in continuing education hours will be subject to formal disciplinary action under section 11 of the act (63 P.S. § 1911) or will be subject to the issuance of a citation under section 5(a) of the act of July 2, 1993 (P.L. 345, No. 48) (63 P.S. § 2205(a)).

(d) Notwithstanding other action taken as set forth in subsection (c), a licensee who is determined to be deficient in continuing education hours is required to make up all deficient hours of continuing education and submit documentation containing the information set forth in subsection (b) to the Board within 6 months from the issuance of a warning letter, the issuance of a citation, or the imposition of discipline. Hours of continuing education submitted to the Board to make up for a deficiency may not be used by the licensee to satisfy the continuing education requirement for the current biennium.


(e) Failure to make up all deficiencies as set forth in subsection (d) will subject the licensee to further disciplinary action under section 11 of the act.

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE

DATE: November 2, 2011

SUBJECT: Proposed Rulemaking:
State Board of Social Workers, Marriage and Family Therapists and
Professional Counselors
Continuing Education Audit and Enforcement (16A-6918)

TO: Shawn E. Smith, Deputy General Counsel
Office of General Counsel

FROM: 
Cynthia K. Montgomery, Regulatory Counsel
Department of State

There are no significant legal and policy issues presented by this proposed rulemaking of the State Board of Social Workers, Marriage and Family Therapists and Professional Counselors. The proposed rulemaking would clarify the continuing education audit and enforcement provisions in the Board's regulations, and revise them to make effective use of the Act 48 citation process for continuing education violations.

I certify that I have reviewed this regulation for form and legality, that I have discussed any legal and policy issues with the administrative officers responsible for the program, and that all information contained in the Preamble and Annex is correct and accurate.

CKM/



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE
BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS
**STATE BOARD OF SOCIAL WORKERS, MARRIAGE AND FAMILY
THERAPISTS AND PROFESSIONAL COUNSELORS**
Post Office Box 2649
Harrisburg, Pennsylvania 17105-2649
(717) 783-1389

August 28, 2012

The Honorable Silvan B. Lutkewitte, III, Chairman
INDEPENDENT REGULATORY REVIEW COMMISSION
14th Floor, Harristown 2, 333 Market Street
Harrisburg, Pennsylvania 17101

Re: Proposed Regulation
State Board of Social Workers, Marriage and Family Therapists and Professional
Counselors
16A-6918: Continuing Education Audit and Enforcement

Dear Chairman Lutkewitte:

Enclosed is a copy of a proposed rulemaking package of the State Board of Social Workers, Marriage and Family Therapists and Professional Counselors pertaining to Continuing Education Audit and Enforcement.

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

Sincerely,

A handwritten signature in black ink that reads "Donna L. Tonrey".

Donna Tonrey, LMFT, Chairperson
State Board of Social Workers, Marriage and
Family Therapists and Professional Counselors

DT/BSM:ld
Enclosure

cc: Katie True, Commissioner
Bureau of Professional and Occupational Affairs
Rebecca Oyler, Director of Policy, Department of State
Steven V. Turner, Chief Counsel
Department of State
Cynthia Montgomery, Regulatory Counsel
Department of State
Beth Sender Michlovitz, Counsel
State Board of Social Workers, Marriage and Family Therapists and Professional
Counselors
State Board of Social Workers, Marriage and Family Therapists and Professional
Counselors

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

I.D. NUMBER: 16A-6918

SUBJECT: CONTINUING EDUCATION AUDIT AND ENFORCEMENT

AGENCY: DEPARTMENT OF STATE (STATE BOARD OF SOCIAL WORKERS,
MARRIAGE & FAMILY THERAPISTS AND PROFESSIONAL COUNSELORS)
BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS

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

2012 AUG 28 PM 2:47

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FILING OF REGULATION

DATE	SIGNATURE	DESIGNATION
		HOUSE COMMITTEE ON PROFESSIONAL LICENSURE
8/28/12	<u>Michelle Warren</u>	MAJORITY CHAIR <u>Julie Harhart</u>
8/28/12	<u>Mary Walmer</u>	SENATE COMMITTEE ON CONSUMER PROTECTION & PROFESSIONAL LICENSURE
		MAJORITY CHAIR <u>Robt. M Tomlinson</u>
8/28/12	<u>K Cooper</u>	INDEPENDENT REGULATORY REVIEW COMMISSION
		ATTORNEY GENERAL (for Final Omitted only)
8/28/12	<u>Senate Hansen</u>	LEGISLATIVE REFERENCE BUREAU (for Proposed only)