

Regulatory Analysis Form

(Completed by Promulgating Agency)

INDEPENDENT REGULATORY
REVIEW COMMISSION

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

(1) Agency
Department of State, Bureau of Professional and
Occupational Affairs

(2) Agency Number: 16A

Identification Number: 6806

IRRC Number: 3001

2013 APR - 2 AM 10: 35

IRRC

RECEIVED

(3) PA Code Cite:

49 Pa. Code § 45.21

(4) Short Title:

Termination of grandfather provisions

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

Primary Contact: Thomas A. Blackburn, Regulatory Unit counsel, Department of State;
(717)783-7200; P.O. Box 2649, Harrisburg, PA 17105-2649; (717)787-0251; tblackburn@pa.gov
Secondary Contact: Cynthia K. Montgomery, Regulatory Counsel, Department of State
(717)783-7200; P.O. Box 2649, Harrisburg, PA 17105-2649; (717)787-0251; cymontgome@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)

When the General Assembly enacted the Speech-Language and Hearing Licensure Act (act) in 1984, it provided in section 7(c) of the act (63 P.S. § 1707(c)) that existing practitioners who, as of the effective date of the act (February 19, 1985), met certain standards and applied would be licensed without regard to the new standards for licensure. The regulations of the State Board of Examiners in Speech-Language and Hearing (Board) initially promulgated in 1988 did not include a maximum time period in which existing practitioners could apply for licensure under these relaxed standards. The rulemaking terminates the "existing practitioner" provisions as of the effective date of the final rulemaking.

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

The rulemaking is authorized under Section 5(2) of the act (63 P.S. § 1705(2)).

(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 rulemaking 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.

In 1984, the General Assembly created the Board and first authorized and required licensure of speech-language pathologists, audiologists and teachers of the hearing impaired. In order to be licensed, section 7(a) of the act requires an applicant to hold a master's degree in speech-language pathology, audiology or education of the hearing impaired, as appropriate, or the equivalent from an accredited institution, have at least 1 year of supervised professional experience in the appropriate field, and pass a licensure examination. Because the General Assembly did not intend to prohibit existing practitioners from continuing to practice if they met certain minimum qualifications, section 7(c) of the act required the Board to waive the requirements for current practitioners who, on the effective date of the act, held a bachelor's degree in the appropriate field and had been employed as such for at least 9 consecutive months in the immediately preceding 3 years, and filed an application with the Board. In its initial regulations promulgated in 1988, the Board provided at § 45.21(c)(relating to waivers) that it would waive the normal licensure requirements for an applicant who held an appropriate bachelor's degree by February 19, 1985; and was employed as such for at least 9 consecutive months between February 19, 1982, and February 19, 1985. The regulations included no termination date for licensure of current practitioners under these grandfather provisions.

While the General Assembly must have intended that current practitioners apply within a reasonable time after enactment of the licensure law, it has now been 27 years since the law was enacted. The Board believes 27 years is much longer than a reasonable period of time in which to apply for licensure. By continuing to grant initial licensure to individuals who qualified for licensure as "existing practitioners" in 1985, the Board would be authorizing to provide services to the public persons who do not meet the standard licensure requirements – do not hold a master's degree and have not completed a year-long supervised professional experience – and who have abandoned any existing property right in practicing the profession by failing to apply for licensure within a reasonable period of time. The public will benefit from the rulemaking, because all future licensees will meet the standard requirements for licensure.

(11) 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.

The rulemaking is not more stringent and does not overlap or conflict with any federal requirements.

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

In order to become licensed as a speech-language pathologist in Delaware, an applicant must have a master's degree or equivalent, complete a supervised clinical practicum, complete a supervised clinical fellowship year, and pass the licensure examination. DEL. CODE TIT. 24, § 3708(a)(1). In order to become licensed as an audiologist in Delaware, an applicant must have a doctoral degree or equivalent and pass the licensure examination. DEL. CODE TIT. 24, § 3708(a)(2). However, an audiologist licensed prior to 1990 need not satisfy this education requirement if the applicant met the requirements for national certification. DEL. CODE TIT. 24, § 3708(a)(2)(c). Except for standard reciprocity for licensure in another state with substantially equivalent standards, there are no provisions under Delaware law to authorize licensure based upon having practiced the profession.

In order to become licensed as an audiologist in Maryland, an applicant must hold a doctoral degree in audiology from an accredited institution, complete a period of supervised postgraduate professional practice, and pass the licensure examination, though before 2007 an applicant could become licensed with a master's degree. MD. HEALTH OCC. CODE § 2-302. In order to become licensed as a speech-language pathologist in Maryland, an applicant must hold a master's degree in speech-language pathology from an accredited institution, complete a period of supervised postgraduate professional practice, and pass the licensure examination. MD. HEALTH OCC. CODE § 2-302.2. Except for standard reciprocity for licensure in another state with substantially equivalent standards, there are no provisions under Maryland law to authorize licensure based upon having practiced the profession.

In order to become licensed as a speech-language pathologist or audiologist in New Jersey, an applicant must have a master's degree or equivalent, complete a supervised clinical internship in the professional area, and pass the written licensure examination. N.J. REV. STAT. § 45:3B-8. However, an applicant who was actively engaged in practice prior to 1970 and practiced in New Jersey for at least 3 of the 5 years immediately preceding passage of the law (in 1984), may be licensed if applying within 1 year of the effective date of the law. N.J. REV. STAT. § 45:3B-11.

In order to become licensed as a speech-language pathologist or audiologist in New York, an applicant must have a master's degree or equivalent, appropriate experience, and pass the licensure examination. N.Y. EDUC. LAW § 8206. However, an applicant who has been engaged in the profession in New York for at least 2 years and meets certain other combined education and experience requirements may be licensed if applying before 1980. N.Y. EDUC. LAW § 8208.

In order to become licensed as a speech-language pathologist in Ohio, an applicant must have a master's degree or equivalent, complete supervised clinical experience in the professional area, pass the licensure examination, and obtain appropriate supervised clinical professional experience. OHIO REV. CODE § 4753.06(B),(D),(E),(F). In order to become licensed as an audiologist in Ohio, an applicant must have a doctoral degree, complete supervised clinical experience in the professional area, pass the licensure examination, and obtain appropriate supervised clinical professional experience. OHIO REV. CODE § 4753.06(C),(D),(E),(F). However, an applicant who holds a bachelor's degree or equivalent and was employed as a speech pathologist or audiologist for at least 9 months in the immediately preceding 3 years (before 1975), may be licensed if applying within 1 year of the effective date of the law. OHIO REV. CODE § 4753.08.

In order to become licensed as a speech-language pathologist or audiologist in West Virginia, an applicant must have an appropriate master's degree or equivalent, complete a supervised clinical practicum experience, complete a post-graduate professional experience, and pass the licensing examination. W.VA. CODE § 30-32-12. However, an applicant who holds a master's degree or equivalent, practiced for at least 2 out of the 5 years immediately preceding passage of the law (in 1992), and passes the examination may be licensed if applying within 1 year of the effective date of the law. W.VA. CODE § 30-32-13(a).

Because all surrounding states require essentially similar current standards for licensure and none continue to permit licensure under standards with less than a master's degree, this rulemaking would not put Pennsylvania at a competitive disadvantage with other states.

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

This rulemaking would not affect other regulations of the Board or other state agencies.

(14) Describe the communications with and solicitation of input from the public, any advisory council/group; small businesses and groups representing small businesses in the development and drafting of the regulation. List the specific persons and/or groups who were involved. ("Small business" is defined in Section 3 of the Regulatory Review Act, Act 76 of 2012.)

In December, 2011, the Board indicated that it intended to terminate licensure of "existing practitioners" under the grandfather/waiver provisions and solicited comments from a large number of persons and organizations of interested persons. Only the Pennsylvania Speech-Language and Hearing Association responded, indicating that it supported the exposure draft of proposed rulemaking. The Board continued to discuss this rulemaking at its public meetings in March and July, 2012. Its meetings are open to the public and are generally attended by organizations representing, among others, the regulated community.

(15) Identify the types and number of persons, businesses, small businesses (as defined in Section 3 of the Regulatory Review Act, Act 76 of 2012) and organizations which will be affected by the regulation. How are they affected?

"Existing practitioners" who have not applied for licensure would be adversely impacted by being precluded from becoming licensed later. However, they could avoid this impact by applying for licensure before the effective date of the final rulemaking.

(16) List the persons, groups or entities, including small businesses, that will be required to comply with the regulation. Approximate the number that will be required to comply.

All individuals who qualify for the waiver available to "existing practitioners" in 1985 would be required to comply with the rulemaking. Because section 6(b)(2) of the act (63 P.S. § 1706(b)(2)) exempts from the licensure requirement persons credentialed by the Department of Education in speech or hearing and employed by a primary or secondary school, the vast majority of applicants who may qualify for this waiver are certified by the Department of Education and have been working in the schools (without a license issued by the Board) under the exemption. Should they leave employment in the schools, they would need to obtain a license in order to continue to provide speech-language services and may not qualify for a license under the current education, experience and examination standards. The Board has no way of knowing how many of these individuals may still be working in the schools.

(17) Identify the financial, economic and social impact of the regulation on individuals, small businesses, businesses and labor communities and other public and private organizations. Evaluate the benefits expected as a result of the regulation.

The Board does not expect this rulemaking to have any financial, economic or social impact on individuals, small businesses, businesses or labor communities or other public or private organizations. As a result of the rulemaking, only those persons who meet the statutory requirements may become licensed, thereby benefitting the public by precluding unqualified persons from becoming licensed.

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

The above-identified benefits of the rulemaking outweigh any cost or adverse effect.

(19) 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.

There are no costs or savings to the regulated community associated with compliance with the rulemaking.

(20) Provide a specific estimate of the costs and/or savings to the **local governments** associated with compliance, including any legal, accounting or consulting procedures which may be required. Explain how the dollar estimates were derived.

There are no costs or savings to local governments associated with compliance with the rulemaking.

(21) Provide a specific estimate of the costs and/or savings to the **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.

There are no costs or savings to state government associated with implementation of the rulemaking.

(22) For each of the groups and entities identified in items (19)-(21) above, 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.

This rulemaking would not require any additional recordkeeping or other paperwork for implementation.

(23) 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						
Local Government						
State Government						
Total Savings	N/A	N/A	N/A	N/A	N/A	N/A
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

(23a) Provide the past three year expenditure history for programs affected by the regulation.

Program	FY -3 (2009-10)	FY -2 (2010-11)	FY -1 (2011-12)	Current FY (2012-13)
Pa. State Bd. of Examiners in Speech-Language and Hearing	(actual) \$168,497	(actual) \$165,852	(actual) \$141,307	(budgeted) \$202,000

(24) For any regulation that may have an adverse impact on small businesses (as defined in Section 3 of the Regulatory Review Act, Act 76 of 2012), provide an economic impact statement that includes the following:

- (a) An identification and estimate of the number of small businesses subject to the regulation.
- (b) The projected reporting, recordkeeping and other administrative costs required for compliance with the proposed regulation, including the type of professional skills necessary for preparation of the report or record.
- (c) A statement of probable effect on impacted small businesses.
- (d) A description of any less intrusive or less costly alternative methods of achieving the purpose of the proposed regulation.

The Board does not expect this rulemaking to have any adverse impact on small businesses. There will be no projected reporting, recordkeeping or other administrative costs required for compliance with the rulemaking. There are no less intrusive or less costly alternative methods of achieving the purpose of the rulemaking.

(25) List any special provisions which have been developed to meet the particular needs of affected groups or persons including, but not limited to, minorities, the elderly, small businesses, and farmers.

The Board has determined that there are no special needs of any subset of its applicants or licensees for whom special accommodations should be made.

(26) 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 schemes were considered.

(27) In conducting a regulatory flexibility analysis, explain whether regulatory methods were considered that will minimize any adverse impact on small businesses (as defined in Section 3 of the Regulatory Review Act, Act 76 of 2012), including:

- a) The establishment of less stringent compliance or reporting requirements for small businesses;
- b) The establishment of less stringent schedules or deadlines for compliance or reporting requirements for small businesses;
- c) The consolidation or simplification of compliance or reporting requirements for small businesses;
- d) The establishment of performing standards for small businesses to replace design or operational standards required in the regulation; and
- e) The exemption of small businesses from all or any part of the requirements contained in the regulation.

Because it does not expect this rulemaking to have any adverse impact on small businesses, the Board did not conduct a regulatory flexibility analysis.

(28) 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.

This rulemaking is not based upon any scientific data, studies, or references.

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

- | | |
|---|--------------------------------|
| A. The date by which the agency must receive public comments: | <u>30 days after publ.</u> |
| B. The date or dates on which public meetings or hearings will be held: | <u>N/A</u> |
| C. The expected date of promulgation of the proposed regulation as a final-form regulation: | <u>within 2 years of publ.</u> |
| D. The expected effective date of the final-form regulation: | <u>final publication</u> |
| E. The date by which compliance with the final-form regulation will be required: | <u>effective date</u> |
| F. The date by which required permits, licenses or other approvals must be obtained: | <u>effective date</u> |

(30) Describe the plan developed for evaluating the continuing effectiveness of the regulations after its implementation.

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. More information can be found on the Board's website (linked as a health-related board from www.dos.state.pa.us/bpoa).

RECEIVED
IRRC

FACE SHEET
FOR FILING DOCUMENTS
WITH THE LEGISLATIVE REFERENCE BUREAU

2013 APR -2. AM 10: 35

(Pursuant to Commonwealth Documents Law)

DO NOT WRITE IN THIS SPACE

Copy below is hereby approved as to
form and legality. Attorney GeneralCopy below is hereby certified to be a true and correct
copy of a document issued, prescribed or promulgated by:Copy below is approved as to
form and legality.
Executive or Independent
Agencies.

State Board of Examiners in Speech-
Language and Hearing

BY: [Signature]
(DEPUTY ATTORNEY GENERAL)

(AGENCY)

BY: [Signature]
SHAWN E. SMITH

MAR 15 2013

DATE OF APPROVAL

DOCUMENT/FISCAL NOTE NO. 16A-6806

FEB 21 2013

DATE OF APPROVAL

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

DATE OF ADOPTION:

BY: [Signature]
James L. Shafer, Au.D.

TITLE: Chairperson
(EXECUTIVE OFFICER, CHAIRMAN OR SECRETARY)

[] 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 EXAMINERS IN SPEECH-LANGUAGE AND HEARING

49 Pa. Code § 45.21
TERMINATION OF GRANDFATHER PROVISIONS

The State Board of Examiners in Speech-Language and Hearing (Board) proposes to amend § 45.21 (relating to waivers), to read as set forth in Annex A.

Effective Date

The proposed amendment would become effective upon publication of the final-form rulemaking in the *Pennsylvania Bulletin*.

Statutory Authority

Section 5(2) of the Speech-Language and Hearing Licensure Act (act) (63 P.S. § 1705(2)) authorizes the Board to adopt and revise rules and regulations consistent with the act as may be necessary to implement the provisions of the act.

Background and Need for the Rulemaking

In 1984, the General Assembly created the Board and first authorized and required licensure of speech-language pathologists, audiologists and teachers of the hearing impaired. Under section 7(a) of the act (63 P.S. § 1707(a)), in order to be licensed, an applicant must hold a master's degree in speech-language pathology, audiology or education of the hearing impaired, as appropriate, or the equivalent from an accredited institution, have at least 1 year of supervised professional experience in the appropriate field, and pass a licensure examination. However, at the time the bill was passed, the General Assembly recognized that persons were already practicing who may not meet the newly established licensure standards and did not intend to prohibit these existing practitioners from continuing to practice if they met certain minimum qualifications. Accordingly, section 7(c) of the act provides a waiver of the newly enacted requirements for existing practitioners who, as of the effective date of the act, held a bachelor's degree in the appropriate field, had been employed as such for at least 9 consecutive months in the 3 years immediately preceding the effective date of the act, and filed an application with the Board. The act was effective February 19, 1985. Therefore, in its initial regulations promulgated in 1988, the Board provided at § 45.21(c) that it would waive the newly enacted requirements for an applicant who held an appropriate bachelor's degree by February 19, 1985; and was employed as such for at least 9 consecutive months between February 19, 1982, and February 19, 1985. The regulations included no termination date for licensure of existing practitioners under this waiver provision.

In providing for licensure of these existing practitioners, the General Assembly required in section 7(c)(2) of the act that the Board apply the relaxed licensure "requirements for any applicant who, on the effective date of this act: ... (2) files an application with the Board." While it would not be reasonable to require each existing practitioner to apply exactly on February 19, 1985, the General Assembly must have intended that existing practitioners apply within a reasonable time after enactment of the licensure law. It has now been 27 years since the law was enacted. Clearly, 27 years is much longer than a reasonable period of time in which to apply for licensure under the more relaxed standards for "existing practitioners." Accordingly, the Board proposes to eliminate the process by which those individuals that qualified as "existing practitioners" in 1985 apply for licensure under the waiver provision.

Description of Proposed Amendments

The rulemaking would amend § 45.21 to provide that the Board will no longer license applicants who apply under the “existing practitioner” provision in the act.

Fiscal Impact and Paperwork Requirements

The rulemaking would not have a fiscal impact on, or create additional paperwork for, the regulated community, the general public, or the Commonwealth and its political subdivisions as it is simply eliminating an outdated waiver provision.

Sunset Date

The Board continuously monitors the effectiveness of 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)), on April 2, 2013, the Board submitted a copy of this proposed rulemaking 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 comments, recommendations or objections to the proposed rulemaking within 30 days of the close of the public comment period. The 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, recommendations or objections regarding this proposed rulemaking to Regulatory Unit counsel, Department of State, at P. O. Box 2649, Harrisburg, PA 17105-2649 or by e-mail at ST-SPEECH@pa.gov, within 30 days of publication of this proposed rulemaking in the *Pennsylvania Bulletin*. Please reference No. 16A-6806 (termination of grandfather provisions), when submitting comments.

James L. Shafer, Au.D., Chairperson
State Board of Examiners in Speech-Language and
Hearing

ANNEX A

TITLE 49. PROFESSIONAL AND VOCATIONAL STANDARDS

PART I. DEPARTMENT OF STATE

Subpart A. PROFESSIONAL AND OCCUPATIONAL AFFAIRS

**CHAPTER 45. STATE BOARD OF EXAMINERS IN
SPEECH-LANGUAGE AND HEARING**

* * * * *

Subchapter B. LICENSURE

* * * * *

§ 45.21. Waivers.

(a) The Board will waive the education, experience and examination requirements of this subchapter for an applicant who:

* * * * *

[(4) Earned a bachelor's degree, as of February 19, 1985, with a major, as appropriate, in speech-language pathology, audiology or teaching of the hearing-impaired from an accredited college or university, and was employed in the appropriate field as a speech-language pathologist, audiologist or teacher of the hearing-impaired for at least 9 consecutive months during the period February 19, 1982 – February 19, 1985. The applicant shall file an application with the Board, and shall cause the degree-awarding institution and the applicable employer to submit to the Board certification of degree and certification of employment status. An applicant who was self-employed during the applicable period shall so certify.]

(b) The Board will not grant a license under section 7(c) of the act (63 P.S. § 1707(c)) to an applicant who applies after (Editor's note: The blank represents the effective date of the final rulemaking).

* * * * *



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE
BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS
STATE BOARD OF EXAMINERS IN SPEECH-LANGUAGE & HEARING
Post Office Box 2649
Harrisburg, Pennsylvania 17105-2649
(717) 783-1389

April 2, 2013

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 Examiners in Speech-Language & Hearing
16A-6806: Termination of Grandfather Provisions

Dear Chairman Lutkewitte:

Enclosed is a copy of a proposed rulemaking package of the State Board of Examiners in Speech-Language & Hearing pertaining to Termination of Grandfather Provisions.

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

Sincerely,

James L. Shafer, AuD, Chairperson
State Board of Examiners in Speech-Language & Hearing

JLS/JPS: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
Judith Pachter Schulder, Counsel
State Board of Examiners in Speech-Language & Hearing
State Board of Examiners in Speech-Language & Hearing

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

I.D. NUMBER: 16A-6806

SUBJECT: TERMINATION OF GRANDFATHER PROVISIONS

AGENCY: DEPARTMENT OF STATE
BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS
STATE BOARD OF EXAMINERS IN SPEECH-LANGUAGE & HEARING

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

2013 APR -2 AM 10:35

RECEIVED
IRRC

FILING OF REGULATION

DATE	SIGNATURE	DESIGNATION
_____	_____	HOUSE COMMITTEE ON PROFESSIONAL LICENSURE
4/2/13	<i>Michelle Warren</i>	MAJORITY CHAIR <u>Julie Harhart</u>
4/2/13	<i>Mary Walmer</i>	SENATE COMMITTEE ON CONSUMER PROTECTION & PROFESSIONAL LICENSURE
_____	_____	MAJORITY CHAIR <u>Robt. M. Tomlinson</u>
4/2/13	<i>K Cooper</i>	INDEPENDENT REGULATORY REVIEW COMMISSION
_____	_____	ATTORNEY GENERAL (for Final Omitted only)
4/2/13	<i>Samantha Jensen</i>	LEGISLATIVE REFERENCE BUREAU (for Proposed only)

March 19, 2013