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Independent Regulatory
Review Commission

From: Hannah Olsem <hannah@rservering.com>
Sent: Saturday, August 17, 2019 4:11 PM
To: IRRC
Subject: Comments on Regulation #54-90: Responsible Alcohol Management Program

IRRC Number: 3236
Agency Name: Pennsylvania Liquor Control Board
Regulation #54-90: Responsible Alcohol Management Program

We have some questions on how the proposed changes to Section 5.226 (relating to training vouchers) should be implemented by a training provider.

Would the training vouchers just go away after the 60 days if not used or would the provider be required to refund the training vouchers that were not used after 60 days?

For example, if the licensee purchases a training voucher and assigns it to an employee, but the employee for some reason doesn't get the training completed within 60 days of the purchase date for that training voucher, does the licensee then have to purchase a new training voucher and assign a new voucher to that employee?

For the 60-day requirement, there are several scenarios that could be problematic.

In addition, we feel the 60-day requirement would add a large amount of paperwork to companies in the state of PA. These companies would not be able to purchase in bulk, so they would have more orders, and more tracking issues / problems.

To protect licensees, an alternative solution would be to require all training providers to have a surety bond. In addition, if they are no longer authorized to provide training, require the training providers to refund all unused training vouchers.

A surety bond would limit the risk to the licensee, as a licensee would be able to obtain a refund (either directly or via the surety bond).

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