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Independent Regulatory
Review Commission

Kathy Cooper

From: Kate Piche <KPiche@restaurant.org>
Sent: Monday, August 19, 2019 12:44 PM
To: IRRC
Cc: Ladesia Taylor; Jay Lerdal; hsterner@prla.org
Subject: IRRC 3236- 40 PA Code Chapter 5 Comments- PA Liquor Control Board

Dear Pennsylvania Liquor Control Board,

Please find below comments and requested changes with rationale to the proposed changes to: Responsible Alcohol Management Program #54-90 (IRRC# 3236).

Comments:

§ 5.224. Online training provider responsibilities.

(4) Provide accurate records of a student's completion of online training to the PLCB immediately following the online training by electronically transmitting the necessary electronic data regarding the student.

(i) Records must be sent in real-time or in frequent batch submissions not more than 15 minutes after completion of the final examination.

Recommended language change: Records must be sent in at least once per business day.

Rationale: Many communication systems and APIs have scheduled maintenance and downtime. There are likely to be periods where it is not possible to send records within 15 minutes. Although the goal will always be to send records in real time, having a wider window for unexpected downtime and maintenance will help to ensure that program can be in compliance.

(7) Provide technical support to students via telephone, internet chat exchange or e-mail. Technical support must be timely and accurate. Any technical support inquiry from a student must be resolved within 1 business day.

Recommended language change: Any technical support inquiry must be addressed within 2 business days. A plan on correction and timeline should be communicated to the student.

Rationale: The goal is to always resolve technical issues as quickly as possible. There are times that communicating with a student to understand the issue can take time due to waiting to hear back from a student. There also can be technical issues that need to be put through a quality assurance process to make sure that all issues are truly resolved. Rushing to meet a one day resolution timeline could prevent an issue from being resolved in the best fashion.

(10) With regard to changes to program content:

(i) Make required changes to written program content within 24 hours of being notified by the PLCB

Recommended language change: Required changes to written program content must be acknowledged within 3 business days. A plan on when the changes will be implemented will be communicated and agreed upon with the PLCB. While changes are being made, the program is able to continue access to the course for any students that have started the previously approved content.

Rationale: Making changes to a properly built and tested online course is nearly impossible to do in one day. Changes to a course may have a need for system downtime. To do this, it is best to schedule the downtime to be a period that will affect the least amount of users which may not be within a 24 hour window. Also, allowing more time for changes to be made allows for proper quality assurance and usability testing to take place which leads to a more positive student experience in a course.

Thank you for the opportunity to comment on the proposed regulation changes! Please let me know if you have any questions related to these recommendations.

Thanks!

Kate

Kate Piche
Sr Director, Accreditation & Compliance
National Restaurant Association
175 W. Jackson Blvd
Suite 1500 Chicago IL 60604
Phone: 312-261-5348
Cell: 312-485-6925



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