

**Madison Brame**

From: Shani Shenk
Sent: Monday, October 20, 2025 2:09 PM
To: Madison Brame
Cc: Corinne Brandt
Subject: FW: Proposed Rulemaking Licensure By Endorsement

Comment on #3458

From: Corinne Brandt <cbrandt@irrc.state.pa.us>
Sent: Monday, October 20, 2025 2:04 PM
To: Shani Shenk <sshensk@irrc.state.pa.us>; Fiona Cormack <fcormack@irrc.state.pa.us>; Leslie Johnson <ljohnson@irrc.state.pa.us>
Subject: Fw: Proposed Rulemaking Licensure By Endorsement

FYI—Comment received.

Corinne
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From: Corinne Brandt <cbrandt@irrc.state.pa.us>
Sent: Monday, October 20, 2025 2:02 PM
To: Adam Shaffer <Adam@pfda.org>; marcfarrel@pa.gov <marcfarrel@pa.gov>
Cc: wesley rish <wesley@rishlawoffice.com>
Subject: Re: Proposed Rulemaking Licensure By Endorsement

Thank you, Adam.

Corinne

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From: Adam Shaffer <Adam@pfda.org>
Sent: Saturday, October 18, 2025 10:42:05 PM
To: marcfarrel@pa.gov <marcfarrel@pa.gov>
Cc: Corinne Brandt <cbrandt@irrc.state.pa.us>; wesley rish <wesley@rishlawoffice.com>
Subject: Proposed Rulemaking Licensure By Endorsement

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Marc and Corinne,

Thank you for sharing this proposed rulemaking with us. I have reviewed the proposed language and all other attachments with our previous and current general counsel and we are in support of this moving forward. I do have a few comments: when talking about demonstrating competency, New Jersey and Maryland both require the applicant to have been practicing in the field for the 5 preceding years. This seems like a better requirement to me

as I am not sure why someone who is not currently engaged in the practice of funeral directing would now seek licensure in our state. The other option is the completion of 6 hours of continuing education, and I am not sure that makes sense either because if the applicant had completed PA continuing education, I would assume that would be because they were already licensed in the Commonwealth. If the idea behind this second option for demonstrating competency was to allow the continuing education requirements to simply replace the requirement to have been actively engaged in the profession during at least 2 of the last 5 years, I am not sure it is a good idea to replace the requirement to be actively engaged in the profession with a simple requirement to complete 6 credit hours of continuing education. Overall, the two suggestions we have made will make this idea even better by further providing for the sufficient safeguards to ensure public protection.

Thank you,

Adam Shaffer
Executive Director
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