

<h1>Regulatory Analysis Form</h1> <p>(Completed by Promulgating Agency)</p> <p>(All Comments submitted on this regulation will appear on IRRC's website)</p>		<p><b>INDEPENDENT REGULATORY REVIEW COMMISSION</b></p> <p><b>RECEIVED</b></p> <p>Independent Regulatory Review Commission November 24, 2025</p>	
<p>(1) Agency</p> <p>Department of State, Bureau of Professional and Occupational Affairs, State Board of Pharmacy</p>		<p>IRRC Number: 3470</p>	
<p>(2) Agency Number: 16A</p> <p>Identification Number: 5432</p>			
<p>(3) PA Code Cite:</p> <p>49 Pa. Code §§ 27.1, 27.25a and 27.25b</p>			
<p>(4) Short Title: Licensure by Endorsement</p>			
<p>(5) Agency Contacts (List Telephone Number and Email Address):</p> <p>Primary Contact: Marc J. Farrell, Regulatory Counsel, Department of State, P.O. Box 69523, Harrisburg, PA 17106-9523; phone (717) 783-7200; <a href="mailto:marcfarrel@pa.gov">marcfarrel@pa.gov</a>.</p> <p>Secondary Contact: Sean Barrett, Board Counsel, State Board of Pharmacy, P.O. Box 69523, Harrisburg, PA 17106-9523; phone (717) 783-7200; <a href="mailto:seabarrett@pa.gov">seabarrett@pa.gov</a>.</p>			
<p>(6) Type of Rulemaking (check applicable box):</p> <p><input checked="" type="checkbox"/> <b>PROPOSED REGULATION</b></p> <p><input type="checkbox"/> Final Regulation</p> <p><input type="checkbox"/> Final Omitted Regulation</p>		<p><input type="checkbox"/> Emergency Certification Regulation;</p> <p><input type="checkbox"/> Certification by the Governor</p> <p><input type="checkbox"/> Certification by the Attorney General</p>	
<p>(7) Briefly explain the regulation in clear and nontechnical language. (100 words or less)</p> <p>This proposed rulemaking effectuates 63 Pa.C.S. § 3111 (relating to licensure by endorsement) for applicants licensed in other jurisdictions where the licensure requirements are substantially equivalent to or exceed those established by the Board. The Board is required to determine methods of demonstrating competency, including completion of continuing education or experience in the profession/occupation for at least 2 of the preceding 5 years, and must establish, by regulation, the expiration of provisional endorsement licenses. This proposed rulemaking sets forth eligibility criteria for licensure by endorsement, the specific methods required to demonstrate competency, and the requirements for provisional endorsement licenses.</p>			

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

63 Pa.C.S. § 3111(a) requires licensing boards and commissions to issue a license, certificate, registration or permit to an applicant, provided the applicant is licensed in good standing in another jurisdiction and meets the requirements for licensure by endorsement. The Board is proposing regulations to implement § 3111(a)(1)-(5), relating to information required to determine the following: whether another jurisdiction's standards for licensure are substantially equivalent to or exceed those established by the Board; the methods of demonstrating competency; whether an applicant has committed an act that would be grounds for refusal, suspension or revocation of a license, certificate, registration or permit to practice in the profession or occupation in this Commonwealth, and whether such act should be an impediment to licensure; whether an applicant has had disciplinary action imposed in another jurisdiction and whether such discipline should be an impediment to licensure; and the fee as established by the Board by regulation. 63 Pa.C.S. § 3111(b) also requires boards and commissions that issue provisional licenses, certificates, registrations or permits to establish the expiration of the provisional endorsement license by regulation.

Section 6(k)(9) of the Pharmacy Act (act) (63 P.S. § 390-6(k)(9)), provides the Board with the authority "to promulgate rules and regulations to effectuate the purposes of this act and to regulate . . . the practice of pharmacy for the protection and promotion of the public health, safety and welfare."

Section 506 of the Admin. Code (71 P.S. §186) empowers the heads of all administrative departments, the several independent administrative boards and commissions, and the several departmental administrative boards and commissions to prescribe rules and regulations, not inconsistent with law, for the government of their respective departments, boards or commissions.

The act of July 1, 2020 (P.L. 575, No. 53) added 63 Pa.C.S. § 3111 as part of the consolidation of the act of July 2, 1993 (P.L. 345, No. 48) (Act 48, repealed) into Title 63, Chapter 31 of the Pennsylvania Consolidated Statutes (relating to powers and duties). The text of 63 Pa.C.S. § 3111 was originally added to Act 48 by the act of July 1, 2019 (P.L. 292, No. 41) (Act 41).

(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.

63 Pa.C.S. § 3111(a)(5) requires the Board to set the fee to be charged by regulation, and subsection (b)(2) requires the Board to set an expiration of the provisional endorsement license. Otherwise, this 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.

The regulation is needed to implement 63 Pa.C.S. § 3111 to provide for licensure by endorsement to applicants from other states, territories and countries. Act 41 was enacted due to a recognition that licensed professionals from other jurisdictions have difficulty obtaining a license to practice in this Commonwealth. 63 Pa.C.S. § 3111 eliminates unnecessary barriers to licensure for citizens from other jurisdictions and for military personnel and their spouses while maintaining sufficient safeguards to ensure

public protection. 63 Pa.C.S. § 3111 enables boards and commissions under the Bureau of Professional and Occupational Affairs (Bureau) to issue a license by endorsement, and further provides for a provisional endorsement license to quickly move these professionals into the workforce without unnecessary delays, which reduces the barriers to employment.

Since the effective date of Act 41 (August 30, 2019), the Board has not received or considered any applications, and has not issued any licenses, under 63 Pa.C.S. § 3111. Based upon these numbers, the Board estimates receiving approximately 0-4 applications for licensure by endorsement under 63 Pa.C.S. § 3111 on an annual basis.

The main reason for this absence of endorsement applications is that the standards for training and testing in the pharmacy field are largely standardized throughout the country. All states require candidates to take and pass the North American Pharmacist Licensure Examination (NAPLEX) as a requirement for initial pharmacy licensure. The NAPLEX is typically taken by recent college of pharmacy graduates shortly after they receive their degree. It is designed to evaluate general practice knowledge and assess a candidate's competence to practice as a pharmacist. The NAPLEX score transfer program allows quick score transferrals to multiple boards of pharmacy in states where candidates wish to obtain pharmacy licensure. Additionally, for some individuals with non-Pennsylvania licenses who wish to become licensed in this Commonwealth, the Board's existing reciprocity provision under § 27.25 (relating to licensure by reciprocity) may be a less stringent pathway to licensure than seeking licensure by endorsement under 63 Pa.C.S. § 3111. For example, there is no requirement for licensure by reciprocity under § 27.25 that an applicant have been actively engaged in the practice of the profession for at least 2 of the preceding 5 years. The Board anticipates that 63 Pa.C.S. § 3111 and this proposed rulemaking may provide a pathway to licensure individuals from other countries.

With regard to pharmacy technicians, they are a new class of licensee to the Commonwealth. Final regulations were published June 28, 2025 (55 Pa.B 4335), and as of that date individuals could begin to apply for registration. Pharmacy technicians have until June 28, 2026, to become registered. Given that this is a new class, the Board anticipates there will be no applications for licensure by endorsement as a pharmacy technician for the next 2 years. This proposed rulemaking and 63 Pa.C.S. § 3111 will offer an additional pathway for pharmacy technicians who meet the requirements for licensure by endorsement.

(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.

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

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

This regulation will not adversely affect Pennsylvania's ability to compete with other states. The purpose of 63 Pa.C.S. § 3111 is to make it easier for out-of-state applicants, including military spouses, who have an out-of-state professional or occupational license to work in Pennsylvania. The purpose of 63 Pa.C.S. § 3111 is also to reduce barriers to employment, which will make Pennsylvania more competitive. 63 Pa.C.S. § 3111 and the Board's proposed regulations will encourage skilled workers and their families to move to Pennsylvania, which will enhance the workforce, provide more talent for businesses and help grow Pennsylvania's economy. Surrounding states also have similar laws and regulations for licensure by

endorsement in the pharmacy field.

In comparing the proposed regulation to other states, the Board researched states in the Northeastern region of the United States. The Board identified one other state (New Jersey) as having a comprehensive license by endorsement law applicable to the various professional licensing boards in New Jersey. Similar to 63 Pa.C.S. § 3111, New Jersey requires its professional licensing boards to issue a license to any person who holds a current professional or occupational license in good standing in another jurisdiction whose licensure standards are substantially equivalent to the current standards of New Jersey. New Jersey requires applicants to demonstrate competency through experience in the practice of the profession within the five years immediately preceding the filing of the application. 63 Pa.C.S. § 3111 allows for additional methods of demonstrating competency that New Jersey does not, including completion of continuing education. Additionally, unlike 63 Pa.C.S. § 3111 and the Board's proposed regulations, New Jersey does not provide for the issuance of discretionary provisional endorsement licenses.

The Board also researched whether other state boards of pharmacy have similar licensure by endorsement laws and regulations applicable to the pharmacy profession. For those states that have similar licensure by endorsement laws and regulations applicable to pharmacists, the Board compared other states' standards in areas where the Board is using its discretion in proposing regulations for eligibility requirements (substantial equivalence or other standard), competency methods, and the issuance and expiration of provisional licenses.

Of the states in the Northeastern region, Connecticut, Delaware, Maryland, Massachusetts, Maine, New Hampshire, New York, Rhode Island, Vermont and West Virginia do not have endorsement provisions for pharmacy-related licensure, but do offer some form of reciprocity. The reciprocity provisions in those states mirror Pennsylvania's, requiring exam score transfers through the National Association of Boards of Pharmacy and completion of the Multistate Pharmacy Jurisprudence Examination.

The Ohio Board of Pharmacy has a provision labeled "reciprocity," but it is more in line with the proposed endorsement provision. Ohio requires that the applicant have obtained a pharmacy degree from a school of pharmacy approved by the state board of pharmacy. Additionally, the applicant must prove competency by either having obtained a Doctor of Pharmacy degree after December 31, 2006 or have a minimum of 1,740 hours documented supervised practical experience. The applicant must also hold an active license in good standing in another state or jurisdiction. Ohio does not offer a provisional license.

Based on this research relating to other states' licensure by endorsement and/or reciprocity requirements, the Board believes the amendments will not put Pennsylvania at a competitive disadvantage. The Board was already in line with other states when considering reciprocity. The proposed regulation merely provides one additional pathway for licensure that some states do not offer. Additionally, 63 Pa.C.S. § 3111 allows the Board to issue, at its discretion, a provisional endorsement license thereby allowing an applicant to commence practicing in this Commonwealth while the applicant is satisfying remaining requirements for licensure by endorsement. None of the researched states offer a provisional endorsement license.

(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 does 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.)

The Board discusses its regulatory proposals at regularly scheduled public meetings. Representatives of the professional associations representing the regulated community routinely attend those meetings. In drafting the proposal, the Board solicited comments from stakeholders and interested parties. One commenter inquired as to whether this proposed regulation impacts authorizations to administer injectable medications, biologicals and immunizations. The proposed regulations would not have an impact on authorizations to administer injectable medications, biologicals and immunizations; therefore, the Board did not consider amendments relating to this issue raised by the commenter.

(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?

This rulemaking only affects individuals who apply for licensure by endorsement under 63 Pa.C.S. § 3111. For purposes of this rulemaking, the Board estimates that 0-4 individuals will apply for licensure by endorsement on an annual basis.

According to the Small Business Administration (SBA), there are approximately 1,169,008 small businesses in Pennsylvania, which is 99.6% of all Pennsylvania businesses. Of the 1,169,008 small businesses, 230,244 are small employers (those with fewer than 500 employees) and the remaining 938,764 are non-employers. Thus, the vast majority of businesses in Pennsylvania are considered small businesses.

According to the Pennsylvania Department of Labor and Industry in 2022 (the most recent year for which data is available), the majority of pharmacists within this Commonwealth worked in health and personal care retailers, i.e. pharmacies (46.34%) and general medical and surgical hospitals (22.28%). Others worked in merchant wholesalers (3.63%), home health care services (3.55%) and for insurance carriers (3.45%). A small percentage of pharmacists work for specialty hospitals (2.17%), for the Federal government (1.50%), management of companies and enterprises (1.42%), outpatient care centers (1.40%) and other ambulatory health care services (0.84%).

Similarly, the majority of pharmacy technicians within this Commonwealth worked in health and personal care retailers, i.e., pharmacies (57.76%) and general medical and surgical hospitals (12.65%). Others worked in food and beverage stores (8.33%), home health care services (3.97%) and merchant wholesalers (3.83%). A small percentage of pharmacy technicians worked for insurance carriers (1.46%), specialty hospitals (1.23%), for the Federal government (1.15%), outpatient care centers (0.73%) and management of companies and enterprises (0.70%).

Small businesses are defined in section 3 of the Regulatory Review Act (71 P.S. § 745.3), which provides that a small business is defined by the SBA’s Small Business Size Regulations under 13 CFR Ch. 1 Part 121. These size standards have been established for types of businesses under the North American Industry Classification System (NAICS). In applying the 2023 standards to the types of employment where the majority of pharmacists and pharmacy technicians may work, a pharmacy or drug retailer (NAICS code 456110) is considered a small business if its average annual receipts are less than \$37.5 million and all

other health and personal care retailers (NAICS code 456199) are considered a small business if its average annual receipts are less than \$9.5 million. General medical and surgical hospitals (NAICS code 622110) and specialty hospitals (NAICS code 622210) are considered small businesses when their average annual receipts are less than \$47 million. For merchant wholesalers, specifically drugs and druggists' sundries (NAICS code 424210), the small business threshold is 250 employees. For home health care services (NAICS code 621610), the small business threshold is \$19 million and for insurance carriers, specifically direct health and medical (NAICS code 524114), the threshold is \$47 million. For supermarkets and other grocery retailers, except convenience retailers, (NAICS code 445110) and department stores (NAICS code 455110) the small business threshold is \$40 million.

The Board does not collect data relating to business size generally, nor does it collect information on the size of the businesses where its licensees are employed specifically. The Board is not able to estimate how many pharmacies are small businesses as the Board does not collect financial or employment information from pharmacies. Many pharmacies such as large retail chains would not qualify as "small businesses" under the SBA definition. Similarly, it is likely that most general medical and surgical hospitals and specialty hospitals in this Commonwealth would also not qualify as small businesses. Nevertheless, in view of the small business thresholds set by NAICS for the businesses in which pharmacists and pharmacy technicians work, the Board believes that many pharmacists and pharmacy technicians in this Commonwealth work in "small businesses" as that term is defined by the SBA and the Regulatory Review Act. Moreover, for purposes of determining the economic impact on small businesses, the Board must assume that a large number of its licensees either are, or work for, small businesses.

This rulemaking only affects individuals seeking licensure by endorsement under 63 Pa.C.S. § 3111. These individuals would be impacted by the \$45 application fee for pharmacists and \$30 application fee for pharmacy technicians, and the costs associated with a fingerprint-based FBI criminal history record check (CHRC). However, these fees/costs are the same as those currently incurred by applicants who apply for initial licensure via the existing pathways (by examination or by reciprocity) under the act. Whether small businesses will be impacted by the regulation depends on whether the businesses will pay the application fee for licensure by endorsement. Because the application fees and other costs are incurred by individuals applying for initial licensure by endorsement, any business (small or otherwise) could avoid these costs by requiring employees to pay their own licensure costs.

The Board believes this proposed rulemaking will have a positive impact in that it is implementing 63 Pa.C.S. § 3111, which provides an additional pathway to licensure that previously did not exist.

(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.

Applicants for licensure by endorsement as a pharmacist or pharmacy technician will be required to comply with the rulemaking. The Board estimates that 0-4 licensure by endorsement applications will be considered each year. Small businesses will only be impacted to the extent they voluntarily pay licensure fees and other costs for applicants.

(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.

This Commonwealth will benefit from licensure by endorsement under 63 Pa.C.S. § 3111. The purpose

of 63 Pa.C.S. § 3111 is to make it easier for out-of-state applicants, including military spouses, who have an out-of-state professional or occupational license to work in Pennsylvania. 63 Pa.C.S. § 3111 also reduces barriers to employment, which will make Pennsylvania more competitive. 63 Pa.C.S. § 3111 and the Board's regulations will encourage skilled workers and their families to move to Pennsylvania, which will enhance the workforce, provide more talent for businesses and help grow Pennsylvania's economy.

The citizens of Pennsylvania will also benefit from the enhanced workforce and growth in the economy while still having assurance of a level of competence on par with existing licensees in this Commonwealth. The Board has selected a method of competence (by experience) that requires an applicant to demonstrate that they have actively engaged in the practice of pharmacy or the practice of a pharmacy technician for 2 of the last 5 years immediately preceding the filing of the application with the Board. This method assures competency because it requires the applicant to show that they have actively engaged in the practice of pharmacy or the practice of a pharmacy technician, thereby showing that they are current and up to date on recent trends and changes in the pharmaceutical field.

The financial impact of the regulation falls primarily on the applicants and the Board. Individuals seeking licensure by endorsement will incur costs associated with qualifying for and obtaining a license. As noted above, an applicant applying for licensure by endorsement as a pharmacist or pharmacy technician under 63 Pa.C.S. § 3111 would be required to pay a \$45 or \$30 application fee, respectively. These fees cover the costs of processing the applications. These application fees are the same fees currently paid by individuals applying for initial licensure by examination and by reciprocity, as authorized by the Pharmacy Act. Applicants would incur a fee for a fingerprint-based FBI CHRC (approximately \$25); however, applicants incur this fee regardless of whether they apply for licensure by examination or endorsement. All applicants must complete child abuse recognition and reporting training, as required by 23 Pa.C.S. § 6383(b)(3)(i) (relating to education and training). There are free in-person and online child abuse recognition and reporting training options available; therefore, the Board does not anticipate a negative fiscal impact for this statutorily mandated training. For foreign applicants, if the other law, regulation or other rule is in a language other than English, proposed § 27.25a(a)(1)(ii) would require the applicant to have it professionally translated at the applicant's expense. To date, the Board has not received any licensure by endorsement applications under 63 Pa.C.S. § 3111 from applicants licensed in other countries or territories.

The positive impact for the applicants is that 63 Pa.C.S. § 3111 and the proposed regulation provide a new pathway to licensure that did not previously exist.

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

As previously discussed, 63 Pa.C.S. § 3111 benefits this Commonwealth, its citizens and individual applicants wishing to obtain licensure. The costs associated with obtaining licensure are outweighed by the need of the Board to set fees to cover its costs for processing applications to maintain the fiscal integrity of the Board, and by the equity of assessing the costs of processing applications to the applicants themselves, as opposed to the existing licensee population bearing these costs through increased biennial renewal fees. The General Assembly contemplated and weighed the impact of imposing fees on applicants in 63 Pa.C.S. § 3111(a)(5) against the benefits of providing an additional pathway to licensure to individuals from other jurisdictions. While avoiding economic impact to applicants is always preferable, the General Assembly recognized that the fees charged by boards are necessary in order to pay for the costs associated with reviewing and processing applications. Additionally, whether an applicant obtains licensure via one of the Board's existing pathways or by licensure by endorsement under 63 Pa.C.S.

§ 3111, applicants face the same costs (i.e., application fee, CHRC fee); therefore, any additional cost to a licensure by endorsement applicant will be minimal, if any.

Regarding the cost of translating the law, regulation or other rule to English, this is a necessary part of the application process. If the Board is unable to understand the other jurisdiction's requirements, it will not be able to determine whether those requirements are substantially equivalent. To date, the Board has not received any licensure by endorsement applications that required a translation of the law, regulation or rule into English, nor does the Board anticipate that many, if any, applicants will incur this cost. Nevertheless, the Board anticipates that the cost of translation would be approximately \$25 per page with the length ranging between two and five pages. Applicants for licensure by endorsement would incur a fee for a fingerprint-based FBI CHRC; however, applicants incur this cost regardless of whether they apply by endorsement or by a more traditional pathway such as licensure by examination.

Regarding costs associated with demonstrating competency, the Board is authorized to select the appropriate methods of competency under 63 Pa.C.S. § 3111(a)(2), and the method chosen by the Board is cost-free. Applicants can demonstrate competency through experience in the practice of pharmacy in one or more substantially equivalent jurisdictions for at least 2 of the 5 years immediately preceding the filing of the application. To the extent ancillary costs arise in satisfying the competency requirement, they would be outweighed by the benefits of this proposed regulation, because demonstrating competency is a statutory requirement that helps to ensure applicants are safe to practice the profession and will not present a danger to the public.

Lastly, completing the mandatory child abuse recognition and reporting training will not have a negative fiscal impact if the applicant chooses a free training course. Requiring licensees to take this training will have a positive impact on the profession and benefit all Pennsylvania citizens because pharmacy professionals will be educated on recognizing child abuse and will also have specific training on how to report child abuse.

(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.

An individual applying for licensure by endorsement as a pharmacist under 63 Pa.C.S. § 3111 will incur some costs, including paying a \$45 application fee and a CHRC fee. These are costs that all applicants for licensure must endure, not just those applying for licensure by endorsement under 63 Pa.C.S. § 3111. Since the effective date of 63 Pa.C.S. § 3111, the Board has considered and approved just one pharmacist licensure by endorsement application. Therefore, during this period, the costs incurred for application fees totaled \$45. The Board anticipates that 0-2 pharmacist licensure by endorsement applications will be considered each year, which will result in approximate application costs in the amount of \$0-\$90 annually (2 pharmacist applicants x \$45 application fee).

Pharmacy technicians are a new class of licensee to the Commonwealth. Final regulations were published June 28, 2025 (55 Pa.B 4335), and individuals have begun to apply for registration. Pharmacy technicians have until June 28, 2026, to become registered. Given that this is a new class, the Board anticipates there will be no applications for licensure by endorsement as a pharmacy technician for the next 2 years. Thereafter, the Board would anticipate the number of licensure by endorsement applications will mirror those of pharmacists, namely, 0-2 per year. This would result in approximate application costs in the amount of \$0-\$60 annually (2 pharmacy technician applicants x \$30 application fee).



Applicants will have to pay a fee (currently, approximately \$25) associated with having a fingerprint-based FBI CHRC conducted. An applicant who needed to have a jurisdiction's laws or regulations translated into English may incur translation fees of approximately \$25 per page with the average length expected to range between two and five pages.

Because all applicants must demonstrate competency by experience in 2 of the last 5 years, there should be no added costs. If no applications for licensure by endorsement under 63 Pa.C.S. § 3111 are filed in a given year, the total costs would be **\$0**. If two pharmacist applications are filed, the total cost estimate for the application fee and CHRC fee would be: \$45 application fee + \$25 FBI CHRC = \$70 per applicant, multiplied by two applicants = **\$140** annually (exclusive of any translation costs). If two pharmacy technician applications are filed, the total cost estimate for the application fee and FBI CHRC fee would be: \$30 application fee + \$25 CHRC = \$55 per applicant, multiplied by two applicants = **\$110** annually (exclusive of any translation costs).

If there are 2 pharmacist applications and 0 pharmacy technician applications filed in each of the first 2 years, the total cost would be **\$140**. If thereafter, there were 2 pharmacist applications and 2 pharmacy technician applications filed each year, the total cost would be  $\$140 + \$110 = \mathbf{\$250}$ .

(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.

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

(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.

The Board will incur increased operational costs to implement licensure by endorsement under 63 Pa.C.S. § 3111. The costs incurred by the Board should be recouped in the form of application fees paid by applicants.

(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.

There should be no legal, accounting or consulting procedures associated with this rulemaking. Like all other applicants under the Board, affected individuals will be required to submit an application for licensure accompanied by required documentation and payment of a fee.

(22a) Are forms required for implementation of the regulation?

Yes, applicants are required to submit an online application.

(22b) If forms are required for implementation of the regulation, **attach copies of the forms here**. If your agency uses electronic forms, provide links to each form or a detailed description of the information required to be reported. **Failure to attach forms, provide links, or provide a detailed description of the information to be reported will constitute a faulty delivery of the regulation.**

The Bureau uses an online platform for the submission of applications for licensure through PALS, which also encompasses applications for licensure by endorsement under 63 Pa. C.S. § 3111. Within the online platform, applicants are asked a series of questions. Applicants are asked if they are currently licensed in another jurisdiction and the type of license for which they are applying. Applicants currently licensed in another jurisdiction, which is defined in the proposed rulemaking as another state, territory or country, are directed to submit a copy of the current applicable law, regulation or other rule governing licensure, certification, registration or permit requirements and scope of practice in the jurisdiction that issued the license, translated into English if needed. Applicants are required to indicate whether they have been disciplined by the jurisdiction in which they are licensed or any other jurisdiction. Applicants with disciplinary history must upload appropriate documentation related to the discipline. Applicants will incur a fee for a fingerprint-based FBI CHRC (approximately \$25); however, all applicants incur this cost regardless of whether they apply for licensure by examination or endorsement. Based upon the above, applications are forwarded to Board counsel, and to the Board, if necessary, to determine eligibility under 63 Pa. C.S. § 3111. The Bureau is working towards creating a more detailed electronic application process specific to 63 Pa. C.S. § 3111 applications, which will decrease the need for manual review of applications. The Board attaches a paper application which will be the basis for developing the electronic licensure by endorsement application. (See Attachment “A”.)

(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 25-26	FY +1 26-27	FY +2 27-28	FY +3 28-29	FY +4 29-30	FY +5 31-32
SAVINGS:						
Regulated Community	N/A	N/A	N/A	N/A	N/A	N/A
Local Government	N/A	N/A	N/A	N/A	N/A	N/A
State Government	N/A	N/A	N/A	N/A	N/A	N/A
Total Savings	N/A	N/A	N/A	N/A	N/A	N/A
COSTS:						
Regulated Community	\$0 - \$140	\$0 - \$140	\$0 - \$250	\$0 - \$250	\$0 - \$250	\$0 - \$250
Local Government	N/A	N/A	N/A	N/A	N/A	N/A
State Government	N/A	N/A	N/A	N/A	N/A	N/A
Total Costs	<b>\$0 - \$140</b>	<b>\$0 - \$140</b>	<b>\$0 - \$250</b>	<b>\$0 - \$250</b>	<b>\$0 - \$250</b>	<b>\$0 - \$250</b>
REVENUE LOSSES:						
Regulated Community	N/A	N/A	N/A	N/A	N/A	N/A

Local Government	N/A	N/A	N/A	N/A	N/A	N/A
State Government	N/A	N/A	N/A	N/A	N/A	N/A
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.

<b>Program</b>	<b>FY –3 2022-2023</b>	<b>FY –2 2023-2024</b>	<b>FY –1 2024-2025 (actual as of 8/14/25)</b>	<b>Current FY 2025-2026 (budgeted)</b>
State Board of Pharmacy	\$3,281,032	\$3,272,548	\$2,941,700	\$3,709,000

(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.

Response:

- (a) This rulemaking will not have an adverse impact on small businesses unless small businesses voluntarily pay application fees or other costs relating to establishing competency. Because these fees are incurred by individuals applying for licensure, any business (small or otherwise) could avoid these costs by requiring employees to pay their own licensure costs.
- (b) This rulemaking will not impose additional reporting, recordkeeping or other administrative costs on small businesses.
- (c) The probable effect on impacted small businesses would be positive because 63 Pa.C.S. § 3111 and the Board's regulations will encourage skilled workers and their families to move to Pennsylvania, which will enhance the workforce, provide more talent for businesses and help grow Pennsylvania's economy.
- (d) The Board could discern no less costly or less intrusive alternative methods to effectuate the purpose of 63 Pa.C.S. § 3111 that would be consistent with the Board's mandate to produce enough revenue to cover its costs of operations and to administer the act in the public interest.

(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.

No special provisions have been developed for any affected groups or persons.

(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 provisions were considered and rejected. The Board believes this proposal represents the least burdensome acceptable alternative.

(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.

Response:

- a) & b) The Board did not consider less stringent reporting requirements or deadlines for small businesses or for applicants that intend to work for small businesses. All applicants for licensure are treated equally.
- c) There are no compliance or reporting requirements that could be consolidated or simplified. The application process is the same whether a particular licensee is employed by a small business or a large business.
- d) The regulations do not contain design or operational standards that need to be altered for small businesses.
- e) To exclude any applicant from the requirements contained in the regulation based on the size of their employers would not be consistent with 63 Pa.C.S. § 3111.

(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.

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

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

- |   |   |
|---|---|
| A. The length of the public comment period:   | 30 days   |
| B. The date or dates on which any public meetings or hearings will be held:                   | No public hearings were scheduled or held. The Board discusses its regulatory proposals at regularly scheduled public meetings. This rulemaking was discussed at public board meetings on: July 24, 2019; August 27, 2019; December 10, 2019; June 16, 2020; June 28, 2022; and January 31, 2023. |
| C. The expected date of delivery of the final-form regulation:                                | Winter 2026   |
| D. The expected effective date of the final-form regulation:                                  | Upon publication as final.  |
| E. The expected date by which compliance with the final-form regulation will be required:     | Upon publication as final.  |
| F. The expected date by which required permits, licenses or other approvals must be obtained: | N/A   |

(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. The Board will meet on the following remaining dates in 2025: October 7 and December 2, 2025. More information can be found on the Board's website.

# **ATTACHMENT A**

**STATE BOARD OF PHARMACY**

P.O. Box 2649  
Harrisburg, PA 17105-2649

**Telephone:** 833-367-2762  
**Website:** [www.dos.pa.gov/pharm](http://www.dos.pa.gov/pharm)  
**E-Mail:** RA-PHARMACY@pa.gov

**Courier Address:**  
2525 N 7th Street  
Harrisburg, PA 17110

**APPLICATION FOR LICENSURE BY ENDORSEMENT UNDER 63 PA.C.S. § 3111**

**PLEASE NOTE:** If a pending application is older than one year from the date submitted and the applicant wishes to continue the application process, the State Board of Pharmacy (Board) shall require the applicant to submit a new application including the required fee.

In order to complete the application process, many of the supporting documents associated with the application cannot be more than six months from the date of issuance. All background check documents cannot be older than 90 days from the date of issuance.

**1. REQUIREMENTS**

**Persons applying for licensure by endorsement under 63 Pa.C.S. § 3111 must:**

- A. Hold a current license, certificate, registration or permit in good standing to practice pharmacy or to practice as a pharmacy technician in a jurisdiction whose standards are substantially equivalent to or exceed those of the Board.
- B. Demonstrate competency by the following:
  - Experience in the practice of pharmacy by demonstrating, at a minimum, that the applicant has actively engaged in the practice of pharmacy or as a pharmacy technician in the jurisdiction that issued the license, certificate, registration or permit or other jurisdiction(s) having substantially equivalent licensure standards for at least 2 of the last 5 years immediately preceding the filing of this application with the Board.
- C. Have not committed any act that constitutes grounds for refusal, suspension or revocation of a license, certificate, registration or permit to practice pharmacy under the act (63 P.S. §§ 390-3(a)(5), 390-5 and 390-8) and has not been disciplined by the jurisdiction that issued the license, certificate, registration or permit or by any other jurisdiction.
- D. Pay the applicable fee for the license or registration being sought:  
\$45 for Pharmacists; \$30 for Pharmacy Technicians
- E. Provide a copy of the current applicable law, regulation or other rule governing licensure, certification, registration or permit requirements and scope of practice in the jurisdiction that issued the license. The copy of the applicable law, regulation or other rule must include the enactment date. If the applicable law, regulation or other rule is in a language other than English, at the applicant's expense, the applicable law, regulation or other rule shall be translated by a professional translation service and verified to be complete and accurate.

**2. APPLICATION CHECKLIST**

**For persons licensed in other jurisdictions who possess a current license, registration, certificate or permit in good standing:**

- ☐ Complete pages 1, 2 and 3 of the application.

*If any documentation submitted in connection with this application will be received in a name other than the name under which you are applying, you must submit a copy of the legal document(s) indicating the name change (i.e., marriage certificate, divorce decree which indicates the retaking of your maiden name, legal document indicating the retaking of a maiden name, or court order).*

- ☐ Application Fee – Check or money order made payable to the Commonwealth of Pennsylvania. Fees

are not refundable or transferable. If you do not receive the Board's approval to sit for the examination (if applicable) within one year from the date your application is received, you will be required to submit another application fee. A processing fee of \$20.00 will be charged for any check or money order returned unpaid by your bank, regardless of the reason for non-payment.

- ☐ Have the out-of-state licensing authorities in which you hold or have held a license submit a letter of good standing directly to the Board with a state seal affixed to the letter.
- ☐ FBI Criminal Background Check: You are required to complete a fingerprint-based FBI background check for review by the Board as part of your application. You must pre-register for fingerprinting services through [IdentoGO](#) and use this service code to ensure the Board receives your results: **1KGF47**. IdentoGO accepts [these identification documents](#). After you are fingerprinted, you will receive a confirmation receipt, which you must upload to your application before submitting it. **Please note:** As of July 2025, the Board no longer accepts copies of FBI Identity History Summary reports submitted by applicants. You must complete the fingerprinting process noted above.
- ☐ The Bureau of Professional and Occupational Affairs (BPOA), in conjunction with the Department of Human Services (DHS), is providing notice to all health-related licensees and funeral directors who are considered "mandatory reporters" under section 6311 of the Child Protective Services Law (CPSL) (23 P.S. § 6311), as amended, that effective January 1, 2015, all persons applying for issuance of an initial license shall be required to complete 3 hours of DHS-approved training in child abuse recognition and reporting requirements as a condition of licensure. Please review the Board website for further information on approved CE providers. Once you have completed a course, the approved provider will electronically submit your name, date of attendance, etc., to the Board. Information regarding child abuse continuing education providers can be found here: <https://www.pa.gov/agencies/dos/resources/professional-licensing-resources/act-31.html>
- ☐ Provide a Self-Query from the National Practitioner Data Bank (if applicable) completed within 90 days of submission of this application to the Board. A Self-Query can be requested online at <https://www.npdb.hrsa.gov/>. When you receive the "Self-Query Response" from the National Practitioner Data Bank, forward it to the Board office. (Verify that "Self-Query Response" is sent to the Board and not a discrepancy notice.)

### 3. INFORMATION

- A. Any change in disciplinary status after the date of submission of the application must be reported to the Board in writing.



STATE BOARD OF PHARMACY

**Mailing Address:**

P.O. Box 2649  
Harrisburg, PA 17105-2649  
Telephone: (833) 367-2762  
Fax: (717) 705-5540

**Courier Address:**

2525 N 7th Street  
Harrisburg, PA 17110  
www.dos.pa.gov/pharm  
ST-PHARMACY@pa.gov

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**APPLICATION FOR LICENSURE BY ENDORSEMENT UNDER 63 PA.C.S. § 3111**

**INITIAL APPLICATION FEE:** PAYABLE TO THE COMMONWEALTH OF PENNSYLVANIA.

Pharmacist - \$45

Pharmacy Technician - \$30

FEEs ARE NOT REFUNDABLE OR TRANSFERABLE. A PROCESSING FEE OF \$20.00 WILL BE CHARGED FOR ANY CHECK OR MONEY ORDER RETURNED UNPAID BY YOUR BANK, REGARDLESS OF THE REASON FOR NON-PAYMENT.

1. Name _____ (Last) (First) (Middle)
2. Will any documentation submitted in connection with this application be received in a name other than the name under which you are applying? YES <input type="checkbox"/> NO <input type="checkbox"/> If yes, please provide the other name or names: _____
3. Address _____ (Street) _____ (City) (State) (Zip Code) <i>The address you provide is the address that will be associated with this application to which all correspondence will be mailed. Please note that licenses are <b>not forwardable</b>.</i>
4. Telephone _____ Fax _____
5. E-Mail Address _____
6. Date of Birth _____ Social Security Number: _____
7. Select the license for which you are applying: <input type="checkbox"/> Pharmacist <input type="checkbox"/> Pharmacy Technician
8. Competency Requirement

Experience:

Have you actively engaged in the practice of pharmacy or practice as a pharmacy technician in the jurisdiction that issued your license, certificate, registration or permit, or other jurisdiction(s) having substantially equivalent licensure standards, for at least 2 of the last 5 years immediately preceding the filing of this application?

☐ Yes

☐ No

**Provide a curriculum vitae demonstrating this experience.**

9. Name of state or jurisdiction where initial license or registration to practice was issued.

\_\_\_\_\_

Date initial license or registration was issued \_\_\_\_\_

List any other state, territory or country where you hold or have held a license/registration.

\_\_\_\_\_

**Have the licensing authority listed above submit a letter of good standing (verification of licensure) directly to the Board with state seal affixed to the letter. Provide a copy of the current applicable law, regulation or other rule governing licensure, certification, registration or permit requirements and scope of practice in the jurisdiction that issued the license.**

		YES	NO
10.	<p>Do you hold, or have you ever held, a license, certificate, permit, registration or other authorization to practice any other profession in any state or jurisdiction?</p> <p>If you answered YES to the above question, please provide the profession and state or jurisdiction. Please do not abbreviate the profession.</p> <p>_____</p> <p>_____</p> <p>The Board must receive verification of any license, certificate, permit, registration or other authorization to practice any other profession directly from the state or jurisdiction. <i>PLEASE NOTE: The Board does NOT need to receive verification for licenses issued by one of the licensing boards within the Pennsylvania Bureau of Professional and Occupational Affairs.</i></p>	<input type="checkbox"/>	<input type="checkbox"/>
<b>If you answer YES to any of the following questions, provide complete details as well as copies of relevant documents to the Board office.</b>		YES	NO
11.	Have you had disciplinary action taken against a professional or occupational license, certificate, permit, registration or other authorization to practice a profession or occupation issued to you in any state or jurisdiction or have you agreed to voluntary surrender in lieu of discipline?	<input type="checkbox"/>	<input type="checkbox"/>
12.	Do you currently have any disciplinary charges pending against your professional or occupational license, certificate, permit or registration in any state or jurisdiction?	<input type="checkbox"/>	<input type="checkbox"/>
13.	Have you withdrawn an application for a professional or occupational license, certificate, permit or registration, had an application denied or refused, or for disciplinary reasons agreed not to apply or reapply for a professional or occupational license, certificate, permit or registration in any state or jurisdiction?	<input type="checkbox"/>	<input type="checkbox"/>
14.	Do you currently have any criminal charges pending and unresolved in any state or jurisdiction?	<input type="checkbox"/>	<input type="checkbox"/>

15.	Do you currently engage in or have you ever engaged in the intemperate or habitual use or abuse of alcohol or narcotics, hallucinogenics or other drugs or substances that may impair judgment or coordination?	<input type="checkbox"/>	<input type="checkbox"/>
16.	Have you ever had provider privileges denied, revoked, suspended or restricted by a Medical Assistance agency, Medicare, third party payor or another authority?	<input type="checkbox"/>	<input type="checkbox"/>
17.	Have you ever had practice privileges denied, revoked, suspended or restricted by a hospital or any health care facility?	<input type="checkbox"/>	<input type="checkbox"/>
18.	Have you ever been charged by a hospital, university, or research facility with violating research protocols, falsifying research, or engaging in other research misconduct?	<input type="checkbox"/>	<input type="checkbox"/>

NOTICE: Disclosing your Social Security Number on this application is mandatory in order for the State Boards to comply with the requirements of the Federal Social Security Act pertaining to Child Support Enforcement, as implemented in the Commonwealth of Pennsylvania at 23 Pa.C.S. § 4304.1(a). At the request of the Department of Human Services (DHS), the licensing boards must provide to DHS information prescribed by DHS about the licensee, including the social security number. In addition, Social Security Numbers are required in order for the Board to comply with the reporting requirements of the U.S. Department of Health and Human Services, National Practitioner Data Bank.

#### **Applicant's Statement:**

I verify that this application is in the original format as supplied by the Department of State and has not been altered or otherwise modified in any way. I am aware of the criminal penalties for tampering with public records or information under 18 Pa.C.S. § 4911.

I verify that the statements in this application are true and correct to the best of my knowledge, information and belief. I understand that false statements are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities) and may result in the suspension, revocation or denial of my license, certificate, registration or permit.

\_\_\_\_\_  
Applicant's Signature

\_\_\_\_\_  
Date

CDL-1

**FACE SHEET  
FOR FILING DOCUMENTS  
WITH THE LEGISLATIVE REFERENCE BUREAU**

**(Pursuant to Commonwealth Documents Law)**

**RECEIVED**

Independent Regulatory  
Review Commission

November 24, 2025

DO NOT WRITE IN THIS SPACE

<p>Copy below is hereby approved as to form and legality. Attorney General</p> <p><b>Katherine P. Zimmermann</b> BY: <u>Katherine P. Zimmermann</u> (DEPUTY ATTORNEY GENERAL)</p> <p>Digitally signed by Katherine P. Zimmermann Date: 2025.11.10 13:16:34 -05'00'</p> <p><u>November 10, 2025</u> DATE OF APPROVAL</p> <p><input type="checkbox"/> Check if applicable Copy not approved. Objections attached.</p>	<p>Copy below is hereby certified to be a true and correct copy of a document issued, prescribed or promulgated by:</p> <p><u>State Board of Pharmacy</u> (AGENCY)</p> <p>DOCUMENT/FISCAL NOTE NO. <u>16A-5432</u></p> <p>DATE OF ADOPTION: _____</p> <p>By: <u>Christine Roussel</u> Christine Roussel, Pharm.D., R.Ph.</p> <p>TITLE <u>Board Chairperson</u> (EXECUTIVE OFFICER, CHAIRMAN OR SECRETARY)</p>	<p>Copy below is hereby approved as to form and legality. Executive or Independent Agencies.</p> <p><u>Cynthia K. Montgomery</u> BY: <u>Cynthia K. Montgomery</u> Deputy General Counsel <del>Chief Counsel, Independent Agency</del> (Strike inapplicable title)</p> <p>Digitally signed by Cynthia K. Montgomery DN: cn=Cynthia K. Montgomery, o=ou, email=cymontgome@pa.gov, c=US Date: 2025.10.15 12:41:50 -04'00'</p> <p><u>October 15, 2025</u> DATE OF APPROVAL</p> <p><input type="checkbox"/> Check if applicable. No Attorney General approval or objection within 30 days after submission.</p>
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**PROPOSED RULEMAKING**

**COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF STATE  
BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS  
STATE BOARD OF PHARMACY**

**TITLE 49 PA CODE CHAPTER 27**

**§§ 27.1, 27.25a and 27.25b**

**LICENSURE BY ENDORSEMENT**

The State Board of Pharmacy (board) proposes to amend § 27.1 (relating to definitions), and add §§ 27.25a and 27.25b (relating to licensure by endorsement; and provisional endorsement license) to read as set forth in Annex A.

***Effective Date***

This proposed rulemaking will be effective upon publication of the final-form rulemaking in the *Pennsylvania Bulletin*.

***Statutory Authority***

Section 3111 of 63 Pa.C.S. (relating to licensure by endorsement) requires licensing boards and commissions to “issue a license, certificate, registration or permit to an applicant to allow practice in this Commonwealth” provided the applicant meets the following criteria: “[h]olds a current license, certificate, registration or permit from another state, territory or country” whose licensing “requirements are substantially equivalent to or exceed the requirements. . .in this Commonwealth”; “demonstrates competency”; “[h]as not committed any act that constitutes grounds for refusal, suspension or revocation of a license, certificate, registration or permit to practice that profession or occupation in this Commonwealth, unless the board or commission determines” such conduct is not an impediment to granting the license, certificate, registration or permit; “[i]s in good standing and has not been disciplined by the jurisdiction that issued the license, certificate, registration or permit, unless . . . the board or . . . commission determines” such conduct is not an impediment to granting the license, certificate, registration or permit; and the applicant pays fees as established by regulation. Additionally, 63 Pa.C.S. § 3111 authorizes boards and commissions to “issue a provisional license, certificate, registration, or permit” while an applicant is satisfying remaining requirements for licensure by endorsement, for which the board

must set by regulation the terms of expiration.

Furthermore, section 6(k)(9) of the Pharmacy Act (act) (63 P.S. § 390-6(k)(9)), provides the board with the authority “to promulgate rules and regulations to effectuate the purposes of this act and to regulate . . . the practice of pharmacy for the protection and promotion of the public health, safety and welfare.”

Section 506 of the Admin. Code (71 P.S. §186) empowers the heads of all administrative departments, the several independent administrative boards and commissions, and the several departmental administrative boards and commissions to prescribe rules and regulations not inconsistent with law, for the government of their respective departments, boards or commissions.

The act of July 1, 2020 (P.L. 575, No. 53) added 63 Pa.C.S. § 3111 as part of the consolidation of the act of July 2, 1993 (P.L. 345, No. 48) (Act 48, now repealed) into 63 Pa.C.S. Chapter 31 (relating to powers and duties). The text of 63 Pa.C.S. § 3111 was originally added to Act 48 by the act of July 1, 2019 (P.L. 292, No. 41) (Act 41).

### ***Background and Need for the Amendments***

This proposed rulemaking is needed to effectuate 63 Pa.C.S. § 3111, which requires the board to issue a license, certificate, registration or permit to an applicant who is licensed in good standing in another jurisdiction and meets the requirements for licensure by endorsement as set forth in 63 Pa.C.S. § 3111. Under 63 Pa.C.S. § 3111(a)(1), the board must determine whether the other jurisdiction’s standards for licensure are substantially equivalent to or exceed those established by the board. Additionally, 63 Pa.C.S. § 3111(a)(2) requires the board to determine the methods of competency, including experience in the profession or occupation for at least 2 of the 5 years immediately preceding the filing of the application, or completion of continuing education. Under

63 Pa.C.S. § 3111(b)(2), the board must also establish, by regulation, the expiration of provisional endorsement licenses.

This proposed rulemaking sets forth the board’s criteria for eligibility for licensure by endorsement, including the specific methods required for an applicant to demonstrate competency. It also sets forth the requirements for granting a provisional endorsement license. Section 3111 of 63 Pa.C.S. further provides that the board may establish appropriate fees for this licensure.

In accordance with the requirements of Executive Order 1996-1 (4 Pa. Code §§ 1.371—1.382), the board sent an exposure draft of this proposed rulemaking to interested parties on April 20, 2021. One comment was received, asking whether the regulations would have an impact on authorizations to immunize for pharmacists. In response, the Board notes that 63 Pa.C.S. § 3111(a)(2) relates to “licenses, certificates, registrations and permits.” The proposed regulations would not have an impact on authorizations to administer injectable medications, biologicals and immunizations; therefore, the board did not consider amendments relating to this issue raised by the commenter.

### ***Description of the Proposed Amendments***

The board proposes to amend § 27.1 (relating to definitions) by adding a definition for the term “jurisdiction” consistent with 63 P.S. § 3111.

Proposed § 27.25a (relating to licensure by endorsement) requires an applicant to satisfy seven criteria for licensure by endorsement. Under subsection 27.25a(a)(1), an applicant shall have a current license, certificate, registration or permit in good standing to practice in another jurisdiction whose standards are substantially equivalent to or exceed standards established by the board under sections 3 and 3.3 of the act (63 P.S. §§ 390-3 and 390-3.3) and §§ 27.21 and 27.701

(relating to application for examination and licensure, and qualifications for pharmacy technician registration). Proposed subsection (a)(1) further requires an applicant to submit a copy of the current applicable law, regulation or other rule governing licensure, certification, registration or permit requirements and scope of practice in the jurisdiction that issued the license, certificate, registration or permit. This proposed rulemaking would also require that the copy of the applicable law, regulation or other rule include the enactment date. Additionally, because 63 Pa.C.S. § 3111 is applicable to territories and other countries where the applicable law, regulation or other rule may be in a language other than English, the board would require translation of the applicable law, regulation or other rule by a professional translation service, at the applicant's expense.

Proposed subsection (a)(2) requires demonstration of competency. Under this provision, an applicant must provide proof of competency by demonstrating experience in the practice of the profession. To demonstrate competency by experience, an applicant must show active engagement in the practice of the profession under a license, certificate, registration or permit, in one or more jurisdictions that have substantially equivalent standards, for at least 2 of the 5 years immediately preceding the filing of the application.

Proposed subsection (a)(3) incorporates the statutory prohibition in 63 Pa.C.S. § 3111 pertaining to conduct that would constitute grounds for refusal, suspension or revocation of a license, certificate, registration or permit to practice the profession or occupation. Similarly, proposed subsection (a)(4) incorporates the statutory prohibition pertaining to prior discipline by the jurisdiction that issued the license, certificate, registration or permit.

Proposed subsection (a)(5) provides for payment of an application fee, as required by 63 Pa.C.S. § 3111(a)(5). No new fee is being proposed. Instead, the applicable fee for licensure by



endorsement of a pharmacist under 63 Pa.C.S. § 3111 will be the existing “application for pharmacist license” fee in § 27.91 (relating to schedule of fees), which is \$45 in the board’s current fee schedule. The applicable fee for licensure by endorsement of a pharmacy technician will be the existing “application for pharmacy technician registration” fee, which is currently \$30.

Proposed subsection (a)(6) requires applicants to apply for licensure in accordance with Chapter 27 and in the manner and format prescribed by the board.

Proposed subsection (a)(7) requires completion of 3 hours of training in child abuse recognition and reporting, which is mandated under the Child Protective Services Law (CPSL) (23 Pa.C.S. § 6383(b)(3)(i)) (relating to education and training).

In proposed § 27.25a(b), the board may require a personal interview or additional information to assist the board in determining eligibility and competency. When a personal interview is necessary, the applicant may request that the interview be conducted by video teleconference for good cause shown.

Consistent with 63 Pa.C.S. § 3111(a)(3) and (4), proposed § 27.25a(c) authorizes the board, in its discretion, to determine that an act prohibited under sections 3.3(a)(5), 5 and 8 of the act (63 P.S. §§ 390-3.3(a)(5), 390-5 and 390-8), or disciplinary action by another jurisdiction, are not impediments to the granting of a license, certificate, registration or permit by endorsement under 63 Pa.C.S. § 3111. Boards routinely consider whether discipline or prohibited acts are impediments to licensure. The board may consider the facts and circumstances surrounding the prohibited act or disciplinary action, an increase in age or maturity of the individual since the date of the prohibited act or disciplinary action, disciplinary history (or lack thereof) before and after the date of the prohibited act or disciplinary action, successful completion of education and training

activities relating to the prohibited act or disciplinary action, and any other information relating to the fitness of the individual for licensure.

Consistent with section 63 Pa.C.S. § 3111(b), proposed § 27.25b (relating to provisional endorsement license) provides that the board may, in its discretion, issue a provisional endorsement license while an applicant is satisfying remaining requirements under 63 Pa.C.S. § 3111 and proposed § 27.25a. Proposed § 27.25b(b)(1) sets the expiration of a provisional endorsement license at 1 year, unless the board determines that an expiration date of less than 1 year is appropriate. Additionally, under proposed subsection (b)(2), upon a written request, the Board may extend the term of the provisional license upon a showing of good cause. Proposed subsection (c) sets forth reasons for which a provisional endorsement license will be terminated, including when the Board denies or grants a license, the provisional endorsement licensee fails to comply with the terms of the provisional endorsement license or the provisional endorsement license expires. Finally, proposed subsection (d) clarifies that while an individual may reapply for a license by endorsement under proposed § 27.25a, the board will not issue a subsequent provisional endorsement license to an applicant who previously held a provisional endorsement license that expired or was terminated.

#### ***Fiscal Impact and Paperwork Requirements***

This proposed rulemaking will have no adverse fiscal impact on the Commonwealth or its political subdivisions. The costs to the board related to processing applications for licensure by endorsement will be recouped through fees paid by applicants. Under § 27.91 (relating to schedule of fees), all applicants for initial licensure as a pharmacist or registration as a pharmacy technician must pay an application fee (currently \$45 and \$30, respectively), which are the same fees that

applicants for licensure by endorsement as a pharmacist or pharmacy technician will pay. All applicants must complete child abuse recognition and reporting training, as required by 23 Pa.C.S. § 6383(b)(3)(i) of the Child Protective Services Law (CPSL). There are free in-person and online child abuse recognition and reporting training options available; therefore, the board does not anticipate a negative fiscal impact for this statutorily mandated training.

### ***Sunset Date***

The board continuously monitors the cost effectiveness of the board's 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 November 24, 2025, 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 the Chairpersons of the Senate Consumer Protection and Professional Licensure Committee (SCP/PLC) and the House Professional Licensure Committee (HPLC). 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 in section 5.2 of the Regulatory Review Act (71 P.S. § 745.5b) 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.

### ***Public Comment***

Interested persons are invited to submit written comments, recommendations or objections regarding this proposed rulemaking to Regulatory Counsel, State Board of Pharmacy, P.O. Box 69523, Harrisburg, PA 17106-9523, or by e-mail at [RA-STRegulatoryCounsel@pa.gov](mailto:RA-STRegulatoryCounsel@pa.gov) within 30 days of publication of this proposed rulemaking in the *Pennsylvania Bulletin*. Please reference “16A-5432 (Licensure by Endorsement)” when submitting comments.

Christine Roussel, Pharm.D., R.Ph.  
Chairperson  
State Board of Pharmacy

**Annex A**

**TITLE 49. PROFESSIONAL AND VOCATIONAL STANDARDS**

**PART I. DEPARTMENT OF STATE**

**Subpart A. PROFESSIONAL AND OCCUPATIONAL AFFAIRS**

**CHAPTER 27. STATE BOARD OF PHARMACY**

**GENERAL PROVISIONS**

**§ 27.1. Definitions.**

The following words and terms, when used in this chapter, have the following meanings, unless the context clearly indicates otherwise:

\* \* \* \* \*

*Institution*—A health care facility as defined in section 103 of the Health Care Facilities Act (35 P.S. § 448.103) which offers care and medical treatment to patients who require food, board and overnight sleeping facilities.

**Jurisdiction—A state, territory or country.**

*Licensed person*—A person holding a license issued by the board.

\* \* \* \* \*

**PHARMACISTS**

*(Editor’s Note: The following sections are proposed to be added and are printed in regular type to enhance readability.)*

**§ 27.25a. Licensure by endorsement.**

(a) *Requirements for issuance.* To be issued a license by endorsement under 63 Pa.C.S. § 3111 (relating to licensure by endorsement), an applicant shall satisfy all of the following

conditions:

(1) Have a current license, certificate, registration or permit in good standing to practice pharmacy or to practice as a pharmacy technician in another jurisdiction whose standards for licensure are substantially equivalent to or exceed those established under sections 3 and 3.3 of the act (63 P.S. §§ 390-3 and 390-3.3) and §§ 27.21 and 27.701 (relating to application for examination and licensure; and qualifications for pharmacy technician registration). The following apply:

(i) An applicant shall submit a copy of the current applicable law, regulation or other rule governing licensure, certification, registration or permit requirements and scope of practice in the jurisdiction that issued the license, certificate, registration or permit.

(ii) If the applicable law, regulation or other rule is in a language other than English, at the applicant's expense, the applicable law, regulation or other rule shall be translated by a professional translation service and verified to be complete and accurate.

(iii) The copy of the applicable law, regulation or other rule must include the enactment date.

(2) Demonstrate competency by experience in the practice of pharmacy or the practice of a pharmacy technician by demonstrating, at a minimum, that the applicant has actively engaged in the practice of pharmacy or the practice of a pharmacy technician under a license, certificate, registration or permit in a jurisdiction or jurisdictions that have substantially equivalent licensure standards, for at least 2 of the 5 years immediately preceding the filing of the application with the board.

(3) Have not committed any act that constitutes grounds for refusal, suspension or revocation of a license, certificate, registration or permit to practice pharmacy or to practice as a pharmacy technician under sections 3.3(a)(5), 5 and 8 of the act (63 P.S. §§ 390-3.3(a)(5), 390-5 and 390-8).

(4) Have not been disciplined by the jurisdiction that issued the license, certificate, registration or permit.

(5) Have paid the application fee as required by § 27.91 (relating to schedule of fees).

(6) Have applied for licensure in accordance with this chapter in the manner and format prescribed by the board.

(7) Have completed 3 hours of training in child abuse recognition and reporting from a provider approved by the Department of Human Services as required under 23 Pa.C.S. § 6383(b)(3)(i) (relating to education and training).

(b) *Interview and additional information.* An applicant may be required to appear before the board for a personal interview and may be required to submit additional information, including supporting documentation relating to competency and experience. The applicant may request the interview to be conducted by video teleconference for good cause shown.

(c) *Prohibited acts and discipline.* Notwithstanding subsection (a)(3) and (4), the board may, in its discretion, determine that an act prohibited under sections 3.3(a)(5), 5 and 8 of the act (63 P.S. §§ 390-3.3(a)(5), 390-5 and 390-8), or disciplinary action by another jurisdiction, is not an impediment to licensure under 63 Pa.C.S. § 3111.

**§ 27.25b. Provisional endorsement license.**

(a) *Provisional endorsement license.* The board may, in its discretion, issue a provisional

endorsement license to an applicant while the applicant is satisfying remaining requirements for licensure by endorsement under 63 Pa.C.S. § 3111 (relating to licensure by endorsement) and § 27.25a (relating to licensure by endorsement).

(b) *Expiration of a provisional endorsement license.*

(1) An individual holding a provisional endorsement license may practice for up to 1 year after issuance of the provisional endorsement license. The board, in its discretion, may determine that an expiration date of less than 1 year is appropriate.

(2) Upon a written request and a showing of good cause, the board may grant an extension of no longer than 1 year from the expiration date of the provisional endorsement license.

(c) *Termination of a provisional endorsement license.* A provisional endorsement license terminates if any of the following occurs:

(1) The board completes its assessment of the applicant and denies or grants the license.

(2) The holder of the provisional license fails to comply with the terms of the provisional endorsement license.

(3) The provisional endorsement license expires.

(d) *Reapplication.* An individual may reapply for licensure by endorsement under § 27.25a after expiration or termination of a provisional endorsement license; however, the board will not issue a subsequent provisional endorsement license.





**COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF STATE  
BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS  
STATE BOARD OF PHARMACY**

**Post Office Box 2649  
Harrisburg, Pennsylvania 17105-2649  
1-833-367-2762**

November 24, 2025

The Honorable George D. Bedwick, Chairman  
INDEPENDENT REGULATORY REVIEW COMMISSION  
14<sup>th</sup> Floor, Harristown 2, 333 Market Street  
Harrisburg, PA 17101

Re: Proposed Rulemaking  
State Board of Pharmacy  
16A-5432: Licensure by Endorsement

Dear Chairman Bedwick:

Enclosed is a copy of a proposed rulemaking package of the State Board of Pharmacy pertaining to Licensure by Endorsement.

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 blue ink, appearing to read 'CRM'.

Christine Roussel, Pharm.D., R.Ph., Chairperson  
State Board of Pharmacy

CR/mjf/wc  
Enclosure

cc: Arion Claggett, Acting Commissioner of Professional and Occupational Affairs  
K. Kalonji Johnson, Deputy Secretary for Regulatory Programs  
Robert Beecher, Policy Director, Department of State  
Andrew LaFratte, Deputy Policy Director, Department of State  
Jason C. Giurintano, Deputy Chief Counsel, Department of State  
Jacqueline A. Wolfgang, Senior Regulatory Counsel, Department of State  
Marc J. Farrell, Regulatory Counsel, Department of State  
Sean C. Barrett, Board Counsel, State Board of Pharmacy  
State Board of Pharmacy

Worthington, Amber

Independent Regulatory  
Review Commission

**From:** Smeltz, Jennifer <jmsmeltz@pasen.gov>  
**Sent:** Monday, November 24, 2025 1:16 PM  
**To:** Worthington, Amber  
**Subject:** Re: DELIVERY NOTICE OF: FIVE (5) PROPOSED REGULATIONS # 16A-5517, 16A-4120, 16A-4334, 16A-5432 & 16A-5625 (Licensure by Endorsement)

November 24, 2025

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Received.

Jen

On Nov 24, 2025, at 12:08 PM, Worthington, Amber <agontz@pa.gov> wrote:

ⓘ CAUTION : External Email ⓘ

Please be advised that the following five (5) boards and commission are **electronically delivering** the below-identified proposed rulemakings today **Monday, November 24, 2025**.

1. **16A-5517 Licensure by Endorsement – State Board of Accountancy**
2. **16A-4120 Licensure by Endorsement – State Architects Licensure Board**
3. **16A-4334 Licensure by Endorsement – State Board of Chiropractic**
4. **16A-5432 Licensure by Endorsement – State Board of Pharmacy**
5. **16A-5625 Licensure by Endorsement – State Real Estate Commission**

These proposed rulemakings each effectuate 63 Pa.C.S. § 3111 (relating to licensure by endorsement) for applicants licensed in other jurisdictions where the licensure requirements are substantially equivalent to or exceed those established by the identified board or commission. Each board/commission is required to determine methods of demonstrating competency, including completion of continuing education or experience in the profession/ occupation for at least 2 of the preceding 5 years, and must establish, by regulation, the expiration of provisional endorsement licenses. These proposed rulemakings set forth eligibility criteria for licensure by endorsement, the specific methods required to demonstrate competency, and the requirements for provisional endorsement licenses.

**The identified state boards/commissions are requesting a written (email) confirmation of receipt of this delivery from the designated contact person(s) from your office for the Majority or Minority Chair of your office effectuating the electronic deliveries.**

Thank you for your attention to this matter.

<image002.png>

Amber A. Worthington, PLS | Legal Office Administrator 2  
Office of Chief Counsel | Department of State  
Governor's Office of General Counsel  
P.O. Box 69523 | Harrisburg, PA 17106-9523  
Office Phone 717.783.7200 | Fax: 717.787.0251  
[agontz@pa.gov](mailto:agontz@pa.gov) | [www.dos.pa.gov](http://www.dos.pa.gov)

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Independent Regulatory  
Review Commission

November 24, 2025

Preferred Pronouns: We/Us, They/Them/Theirs

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<16A-5517 Stefano.pdf>  
<16A-4120 Licensure by Endorsement Stefano.pdf>  
<16A-4334 Proposed Stefano.pdf>  
<16A-5432 Proposed Stefano.pdf>  
<16A-5625 Stefano.pdf>

**Worthington, Amber**

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**From:** Bulletin <bulletin@palrb.us>  
**Sent:** Monday, November 24, 2025 1:09 PM  
**To:** Worthington, Amber; Adeline E. Gaydosh  
**Cc:** Roland, Joel; Wolfgang, Jacqueline; Alyssa M. Burns  
**Subject:** [External] RE: DELIVERY NOTICE OF: FIVE (5) PROPOSED REGULATIONS # 16A-5517, 16A-4120, 16A-4334, 16A-5432 & 16A-5625 (Licensure by Endorsement)

November 24, 2025

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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Good afternoon,

Thank you for submitting these five proposed rulemakings. They will be published in the December 20, 2025, issue of the *Pennsylvania Bulletin*.

Have a great day!

**Alyssa Burns | Legal Assistant**  
[aburns@palrb.us](mailto:aburns@palrb.us) | 717.783.1531  
Legislative Reference Bureau  
Pennsylvania Code & Bulletin Office  
647 Main Capitol Building  
Harrisburg, PA 17120

---

**From:** Worthington, Amber <agontz@pa.gov>  
**Sent:** Monday, November 24, 2025 12:08 PM  
**To:** Bulletin <bulletin@palrb.us>; Adeline E. Gaydosh <agaydosh@palrb.us>; Leah Brown <lbrown@palrb.us>  
**Cc:** Roland, Joel <joeroland@pa.gov>; Worthington, Amber <agontz@pa.gov>  
**Subject:** DELIVERY NOTICE OF: FIVE (5) PROPOSED REGULATIONS # 16A-5517, 16A-4120, 16A-4334, 16A-5432 & 16A-5625 (Licensure by Endorsement)

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exceed those established by the identified board or commission. Each board/commission is required to determine methods of demonstrating competency, including completion of continuing education or experience in the profession/ occupation for at least 2 of the preceding 5 years, and must establish, by regulation, the expiration of provisional endorsement licenses. These proposed rulemakings set forth eligibility criteria for licensure by endorsement, the specific methods required to demonstrate competency, and the requirements for provisional endorsement licenses.

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Amber A. Worthington, PLS | Legal Office Administrator 2  
Office of Chief Counsel | Department of State  
Governor's Office of General Counsel  
P.O. Box 69523 | Harrisburg, PA 17106-9523

Office Phone 717.783.7200 | Fax: 717.787.0251

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November 24, 2025

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Worthington, Amber

Independent Regulatory  
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**From:** Orchard, Kari L. <KOrchard@pahouse.net>  
**Sent:** Monday, November 24, 2025 12:31 PM  
**To:** Worthington, Amber; Barton, Jamie; Brett, Joseph D.  
**Cc:** Roland, Joel  
**Subject:** RE: DELIVERY NOTICE OF: FIVE (5) PROPOSED REGULATIONS # 16A-5517, 16A-4120, 16A-4334, 16A-5432 & 16A-5625 (Licensure by Endorsement)

November 24, 2025

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Regulations received. Thank you!

**Kari Orchard**

Executive Director (D) | House Professional Licensure Committee  
Chairman Frank Burns, 72<sup>nd</sup> Legislative District

---

**From:** Worthington, Amber <agontz@pa.gov>  
**Sent:** Monday, November 24, 2025 12:05 PM  
**To:** Orchard, Kari L. <KOrchard@pahouse.net>; Barton, Jamie <JBarton@pahouse.net>; Brett, Joseph D. <JBrett@pahouse.net>  
**Cc:** Roland, Joel <joeroland@pa.gov>; Worthington, Amber <agontz@pa.gov>  
**Subject:** DELIVERY NOTICE OF: FIVE (5) PROPOSED REGULATIONS # 16A-5517, 16A-4120, 16A-4334, 16A-5432 & 16A-5625 (Licensure by Endorsement)

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Office of Chief Counsel | Department of State  
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Review Commission

November 24, 2025

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**Worthington, Amber**

**From:** Emily Hackman <Ehackman@pahousegop.com>  
**Sent:** Monday, November 24, 2025 12:21 PM  
**To:** Worthington, Amber  
**Cc:** Roland, Joel; Cindy Sauder  
**Subject:** RE: [EXTERNAL]: DELIVERY NOTICE OF: FIVE (5) PROPOSED REGULATIONS # 16A-5517, 16A-4120, 16A-4334, 16A-5432 & 16A-5625 (Licensure by Endorsement)

November 24, 2025

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Received. Thank you!

**Emily Epler Hackman | Senior Policy Analyst**  
Pennsylvania House of Representatives  
Health Committee (R)  
141 Ryan Office Building  
Phone: (717) 260-6351

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**From:** Worthington, Amber <agontz@pa.gov>  
**Sent:** Monday, November 24, 2025 12:06 PM  
**To:** Nicole Sidle <Nsidle@pahousegop.com>; Cindy Sauder <Csauder@pahousegop.com>; Emily Hackman <Ehackman@pahousegop.com>  
**Cc:** Roland, Joel <joeroland@pa.gov>; Worthington, Amber <agontz@pa.gov>  
**Subject:** [EXTERNAL]: DELIVERY NOTICE OF: FIVE (5) PROPOSED REGULATIONS # 16A-5517, 16A-4120, 16A-4334, 16A-5432 & 16A-5625 (Licensure by Endorsement)

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Thank you for your attention to this matter.

Independent Regulatory  
Review Commission

November 24, 2025



Amber A. Worthington, PLS | Legal Office Administrator 2  
Office of Chief Counsel | Department of State  
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P.O. Box 69523 | Harrisburg, PA 17106-9523  
Office Phone 717.783.7200 | Fax: 717.787.0251  
[agontz@pa.gov](mailto:agontz@pa.gov) | [www.dos.pa.gov](http://www.dos.pa.gov)

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**Worthington, Amber**Independent Regulatory  
Review Commission

**From:** Monoski, Jesse <jesse.monoski@pasenate.com>  
**Sent:** Monday, November 24, 2025 12:05 PM  
**To:** Worthington, Amber; Dimm, Ian; Kelly, Joseph; Vazquez, Enid  
**Cc:** Roland, Joel  
**Subject:** RE: DELIVERY NOTICE OF: FIVE (5) PROPOSED REGULATIONS # 16A-5517, 16A-4120, 16A-4334, 16A-5432 & 16A-5625 (Licensure by Endorsement)

November 24, 2025

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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## Jesse A. Monoski

Executive Director  
Senate Consumer Protection & Professional Licensure Committee  
Senator Lisa M. Boscola, Minority Chair  
Room 458 Main Capitol Bldg., Harrisburg, Pa. 17120  
Office: 717-787-4236 | Direct: 717-787-3506  
[www.senatorboscola.com](http://www.senatorboscola.com)

---

**From:** Worthington, Amber <agontz@pa.gov>  
**Sent:** Monday, November 24, 2025 12:02 PM  
**To:** Monoski, Jesse <jesse.monoski@pasenate.com>; Dimm, Ian <ian.dimm@pasenate.com>; Kelly, Joseph <joseph.kelly@pasenate.com>; Vazquez, Enid <enid.vazquez@pasenate.com>  
**Cc:** Roland, Joel <joeroland@pa.gov>; Worthington, Amber <agontz@pa.gov>  
**Subject:** DELIVERY NOTICE OF: FIVE (5) PROPOSED REGULATIONS # 16A-5517, 16A-4120, 16A-4334, 16A-5432 & 16A-5625 (Licensure by Endorsement)

**EXTERNAL EMAIL**

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November 24, 2025

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