

<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>INDEPENDENT REGULATORY REVIEW COMMISSION</p> <p>RECEIVED</p> <p>Independent Regulatory Review Commission</p> <p>December 9, 2025</p> <p>IRRC Number: 3473</p>	
<p>(1) Agency</p> <p>Department of State, Bureau of Professional and Occupational Affairs, State Registration Board for Professional Engineers, Land Surveyors and Geologists</p>			
<p>(2) Agency Number: 16A</p> <p>Identification Number: 4717</p>			
<p>(3) PA Code Cite:</p> <p>49 Pa. Code §§ 37.16, 37.31, 37.32, 37.33, 37.33a and 37.47</p>			
<p>(4) Short Title:</p> <p>Engineer Interns</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; marcfarrel@pa.gov.</p> <p>Secondary Contact: Ashley Goshert, Board Counsel, State Registration Board for Professional Engineers, Land Surveyors and Geologists, Department of State, P.O. Box 69523, Harrisburg, PA 17106-9523; phone (717) 783-7200; agoshert@pa.gov.</p>			
<p>(6) Type of Rulemaking (check applicable box):</p> <p><input type="checkbox"/> Proposed Regulation</p> <p><input type="checkbox"/> Final Regulation</p> <p><input checked="" type="checkbox"/> FINAL OMITTED REGULATION</p>		<p><input type="checkbox"/> Emergency Certified 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 rulemaking conforms existing regulations of the State Registration Board for Professional Engineers, Land Surveyors and Geologists (board) to recent amendments to the Engineer, Land Surveyor and Geologist Registration Law, resulting from the act of June 28, 2024 (P.L. 421, No. 32) (Act 32). Act 32 replaced the term “engineer-in-training” with “engineer intern” – a title recommended by the National Council of Examiners for Engineering and Surveying (NCEES). The rulemaking also aligns with Act 32’s change regarding the timing of when engineers-in-training and surveyors-in-training may commence obtaining the 4 years of work experience needed for licensure as a professional engineer or land surveyor.</p>			

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

Subsection 4(l) of the Engineer, Land Surveyor and Geologist Registration Law (act) (63 P.S. § 151(l)) authorizes the board to adopt and promulgate administrative rules and regulations, not inconsistent with the act, as are deemed necessary and proper by the board to carry into effect the powers conferred by the act. In addition, section 204(3) of the Commonwealth Documents Law (CDL), 45 P.S. § 1204(3), allows an agency to omit the procedures for proposed rulemaking in section 201, regarding notice of proposed rulemaking, and section 202, regarding adoption of regulations, if the agency finds that the specified procedures are impracticable, unnecessary or contrary to the public interest.

(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.

No, the regulation is not mandated by any federal or state law or court order, or federal regulations.

(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 remove the outdated term “engineer-in-training” and replace it with the term “engineer intern,” in conformance with Act 32. The regulation is also needed to reflect Act 32’s amendments to the act which allow engineers-in-training and surveyors-in-training to have experience counted toward the licensure requirement regardless of whether it was obtained prior to or after the issuance of their training certificate.

In making these amendments, it is the board’s goal to avoid the confusion that can often arise when regulations do not reflect recent statutory changes to an act. Updating a regulation to align with the language of the statute is crucial for maintaining clarity and consistency. This, in turn, boosts stakeholders’ confidence in both the law and the regulations because they know they can rely on the regulations as being consistent with the intent of the statute. Updating regulations in this manner also helps to limit the types of misinterpretations that can occur when the language of the regulation differs significantly from the language of the statute.

(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.

No, there are no federal standards on the topic.

(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. It merely conforms the regulation to the General Assembly’s decision – as reflected in Act 32 – to change the nomenclature from “engineer-in-training” to “engineer intern,” and to credit engineers-in-training and surveyors-in-training for years of experience without regard to whether it was obtained before or after the

issuance of their training certificate. For reference, other states handle these issues as follows:

Terminology change from “engineer-in-training” to “engineer intern”

Of the immediately surrounding states, Delaware, Ohio and West Virginia use the term “engineer interns.” Maryland, New Jersey and New York use the term “engineer-in-training.”

Allowing experience obtained before issuance of training certificate to be counted toward licensure.

In Delaware, individuals do not have to wait until after their engineer intern certificate has been issued to begin obtaining qualifying engineering work experience. The clock for required work experience begins after earning one’s degree. Land surveyors-in-training (LSIT), however, must obtain a training certificate before they can begin to accumulate the specific work experience required for licensure as a professional land surveyor. The work experience must be gained under the supervision of a licensed professional land surveyor after the certificate has been issued.

In Maryland, engineering work experience must be accumulated after *earning an engineering degree* to count toward one’s professional engineer license. The timing of the engineer-in-training certificate is not the determining factor for counting this experience. Land surveying work experience must be accrued after receiving a surveyor-in-training (SIT) certificate. The SIT certificate is awarded after passing the Fundamentals of Surveying (FS) exam, and this step formally begins the required period of supervised experience.

In New Jersey, the required 4 years of engineering work experience for a professional engineer license is not limited to experience gained solely after receiving an engineer-in-training certificate. Acceptable experience can be accumulated after earning a bachelor’s degree. For prospective land surveyors, before starting to accumulate the required work experience after completing their degree they must first pass the national FS exam, which is a prerequisite to obtaining a surveyor-in-training certificate. Thereafter, individuals must complete 3 years of work experience in land surveying.

In New York, qualifying engineering work experience is not tied to obtaining an engineer-in-training certificate and can be accumulated after graduating with an engineering degree. Land surveying work experience can be gained before issuance of a training certificate and in certain circumstances can even be gained before obtaining a degree. The board evaluates the nature of the experience to ensure it is of an increasing level of complexity and responsibility. Experience gained while pursuing one’s degree may be accepted if it meets the board’s criteria, such as cooperative work programs.

In Ohio, the State Board of Registration for Professional Engineers and Surveyors (PEPS) will count some engineering experience earned before the issuance of an Engineer Intern (EI/EIT) certificate. The experience must meet specific criteria to be considered for credit toward a Professional Engineer (PE) license. With regard to land surveyors, individuals can begin accumulating surveying work experience only after passing the FS exam and being issued a temporary surveyor-in-training license.

The West Virginia Board of Registration for Professional Engineers requires 4 years of progressive experience gained after graduation from a board-approved curriculum to be considered for professional engineer licensure. West Virginia will not count any engineering experience prior to one’s graduation date. Prospective land surveyors can begin to accumulate land surveying work experience before they obtain their surveyor-in-training certificate. West Virginia notes that many individuals begin in entry-level roles, such as a field or surveying technician, to get on-the-job training. This experience often occurs

before a surveyor-in-training certificate has been earned.

The board notes that even if there was an impact on Pennsylvania's ability to compete with other states, it would not be from this rulemaking itself. Rather, any such impact would be the result of the General Assembly's passage of Act 32 which amended the act, thereby effectuating the aforementioned changes. The rulemaking simply conforms the existing regulations to those statutory amendments.

Having said that, the board believes that this regulation will not place Pennsylvania at a competitive disadvantage. If anything it will help Pennsylvania compete, because by allowing engineers-in-training and surveyors-in-training to begin accruing qualifying experience prior to the issuance of a training certificate, Pennsylvania's requirements will generally be more in line with its surrounding neighbor states. Individuals pursuing licensure as a professional engineer or land surveyor look favorably upon the ability to start gaining experience without having to wait until after issuance of their training certificate. It can enable them to become fully licensed sooner than would otherwise be the case, if they so desire.

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

No, this regulation will not affect any other regulations of the Department, the Bureau, the board or any other state agency.

(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.)

All rulemaking activities of the board are discussed and voted on in public board meetings which are routinely attended by representatives of the public and the regulated community. Because this rulemaking is very narrow and is necessary to update the board's regulations to reflect the statutory amendments of Act 32, the board did not engage in extensive public outreach and did not distribute an exposure draft prior to adopting this final-omitted regulation. The board did discuss this rulemaking at its public meetings on November 13, 2024, and May 15, 2025.

(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?

The board receives an average of approximately 900 engineer-in-training applications and 45 surveyor-in-training applications annually. Those individuals would be positively impacted by the Act 32 changes embodied in this rulemaking. By way of background, the board currently has approximately 20,077 engineer-in-training (engineer interns) and 444 surveyor-in-training certificate holders.

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 (L&I), in 2022 (the most recent year for which data is available), engineers, including engineers-in-training or engineer interns, held approximately 11,913 jobs statewide. The largest employers of engineers were architectural, engineering, and related services (59.06%), State government (excluding education and hospitals) (15.26%), the local government (excluding education and hospitals) (4.11%), in management of companies and enterprises (3.63%) and as self-employed workers as a primary job (3.04%). Other employers are the Federal government (2.87%), management, scientific, and technical consulting services (1.93%), scientific research and development services (1.46%), highway, street, and bridge construction (0.69%) and building equipment contractors (0.58%).

Also according to L&I, in 2022, surveyors, including surveyors-in-training, held approximately 1,615 jobs statewide. The largest employers of surveyors were architectural, engineering, and related services (65.63%), highway, street, and bridge construction (4.89%), as self-employed workers as a primary job (3.90%), the local government (excluding education and hospitals) (2.72%), State government (excluding education and hospitals) (1.49%), and in management of companies and enterprises (0.80%). Other employers were marked 'Confidential' in the L&I report, including oil and gas extraction, coal mining, nonmetallic mineral mining and quarrying, and residential building construction.

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 NAICS standards to the types of businesses where engineers and surveyors may work, the small business thresholds are as follows: engineering services (NAICS 541330) \$25.5 million or less; geophysical surveying and mapping services (NAICS 541360) \$28.5 million or less; surveying and mapping (except geophysical) services (NAICS 541370) \$19.0 million or less; architectural services (NAICS 541310) \$12.5 million or less; landscape architectural services (NAICS 541320) \$9.0 million or less; management of companies and enterprises (NAICS 551111 and 551112) \$38.5 and \$45.5 million or less depending on the type of holding company; management, scientific, and technical consulting services (NAICS 541618 and 541690) \$19 million or less; scientific research and development services (NAICS 541715) 1,000 employees or less; highway, street, and bridge construction (NAICS 237310) \$45 million or less; building equipment contractors (NAICS 238290) \$22 million or less.

The NAICS codes do not include professionals who work in the Federal, State and local governments. The professionals who are self-employed obviously work in small businesses. Furthermore, the board does not collect information on the size of the businesses where its licensees are employed. However, 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 as that term is defined by the SBA and Pennsylvania's Regulatory Review Act.

This rulemaking affects engineers-in-training (engineer interns) and surveyors-in-training regarding the timing of when these licensees may commence obtaining the 4 years of work experience needed for licensure as a professional engineer or land surveyor. There are no additional costs to the regulated community related to this rulemaking and the board does not believe this regulation would adversely affect any business, be it large or small. The statutory amendments of Act 32 benefit engineers-in-training and surveyors-in-training by allowing them to have experience obtained prior to the issuance of their training certificate counted toward the licensure requirement of 4 years' experience. This, in turn, will allow engineers and land surveyors to achieve full licensure sooner.

(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.

There are no compliance aspects associated with the nomenclature change from “engineer-in-training” to “engineer intern.” Nor are there any compliance aspects associated with allowing experience obtained before issuance of the training certificate to be counted toward the licensure requirement. Engineers-in-training and surveyors-in-training are not *required* to obtain experience before they obtain their training certificate. If they desire to do so, they may.

(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.

There are no adverse impacts associated with this regulation on individuals, small businesses or any other entity. The statutory amendments of Act 32 benefit engineers-in-training and surveyors-in-training by allowing them to have experience obtained prior to the issuance of their training certificate counted toward the licensure requirement of 4 years’ experience. This, in turn, will allow engineers and land surveyors to achieve full licensure sooner.

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

There are no costs or adverse effects associated with this regulation.

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

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

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

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

(21) Provide a specific estimate of the costs and/or savings to the **state government** associated with the implementation of the regulation, including any legal, accounting, or consulting procedures which may be required. Explain how the dollar estimates were derived.

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

(22) For each of the groups and entities identified in items (19)-(21) above, submit a statement of legal, accounting or consulting procedures and additional reporting, recordkeeping or other paperwork, including copies of forms or reports, which will be required for implementation of the regulation and an explanation of measures which have been taken to minimize these requirements.

There are no additional legal, accounting or consulting procedures or additional reporting, recordkeeping or other paperwork requirements required for implementation.

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

There are no forms required for implementation of this regulation.

(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.**

N/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 2025-26	FY +1 2026-27	FY +2 2027-28	FY +3 2028-29	FY +4 2029-30	FY +5 2030-31
SAVINGS:						
Regulated Community	\$0	\$0	\$0	\$0	\$0	\$0
Local Government	\$0	\$0	\$0	\$0	\$0	\$0
State Government	\$0	\$0	\$0	\$0	\$0	\$0
Total Savings	\$0	\$0	\$0	\$0	\$0	\$0
COSTS:						
Regulated Community	\$0	\$0	\$0	\$0	\$0	\$0
Local Government	\$0	\$0	\$0	\$0	\$0	\$0
State Government	\$0	\$0	\$0	\$0	\$0	\$0
Total Costs	\$0	\$0	\$0	\$0	\$0	\$0
REVENUE LOSSES:						
Regulated Community	\$0	\$0	\$0	\$0	\$0	\$0
Local Government	\$0	\$0	\$0	\$0	\$0	\$0
State Government	\$0	\$0	\$0	\$0	\$0	\$0
Total Revenue Losses	\$0	\$0	\$0	\$0	\$0	\$0

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

Program	FY -3 2022-2023 (actual)	FY -2 2023-2024 (actual)	FY -1 2024-2025 (projected)	Current FY 2025-2026 (budgeted)
State Registration Board for Professional Engineers, Land Surveyors and Geologists	\$1,219,340	\$1,596,397	\$1,554,000	\$1,717,000

(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.

Responses:

- (a) There is no adverse economic impact on small businesses (or any other size business) associated with this regulation.
- (b) There are no additional reporting, recordkeeping or administrative costs associated with this regulation.
- (c) This regulation has no effect, fiscal or otherwise, on small businesses. The regulation is merely conforming to straightforward statutory amendments.
- (d) No less intrusive or less costly alternatives were identified; the amendments are to align the board's regulations with recent statutory changes.

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

The board has identified no special groups that need special provisions. The regulation mirrors amendments to the act.

(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 have been considered. This rulemaking brings the board's regulations into conformity with recent statutory amendments.

(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 performance 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.

As this rulemaking has no adverse impact on small business, no regulatory flexibility analysis was conducted.

(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.

The regulation is not based on any data.

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

- | | |
|---|---|
| A. The length of the public comment period: | N/A |
| B. The date or dates on which any public meetings or hearings will be held: | There are no date(s) on which any public meetings or hearings will be held relative to this rulemaking. The board's upcoming public meeting dates are set forth in item (30) below. |
| C. The expected date of delivery of the final-form regulation: | The final-omitted rulemaking is expected to be delivered in Fall 2025. |
| D. The expected effective date of the final-form regulation: | Upon publication |
| E. The expected date by which compliance with the final-form regulation will be required: | Upon publication |
| 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 date in 2025: November 13, 2025. In 2026, the board is scheduled to meet on January 14, March 18, May 20, July 22, September 23 and December 2, 2026. More information can be found on the board's website.

CDL-1

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

(Pursuant to Commonwealth Documents Law)

RECEIVED

Independent Regulatory
Review Commission

December 9, 2025

DO NOT WRITE IN THIS SPACE

<p>Copy below is hereby approved as to form and legality. Attorney General</p> <p>BY: _____ (DEPUTY ATTORNEY GENERAL)</p> <p>_____ 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 Registration Board for Professional Engineers, Land Surveyors and Geologists</u> (AGENCY)</p> <p>DOCUMENT/FISCAL NOTE NO. <u>16A-4717</u></p> <p>DATE OF ADOPTION: _____</p> <p>BY: <u></u> Robert P. Kudlawiec, PE</p> <p>TITLE <u>Board President</u> (EXECUTIVE OFFICER, CHAIRMAN OR SECRETARY)</p>	<p>Copy below is hereby approved as to form and legality. Executive or Independent Agencies.</p> <p>BY: <u></u> (Deputy General Counsel, Chief Counsel, Independent Agency) (Strike inapplicable title)</p> <p><u>11/14/2025</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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FINAL RULEMAKING (WITH PROPOSED OMITTED)

COMMONWEALTH OF PENNSYLVANIA

DEPARTMENT OF STATE

BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS

**STATE REGISTRATION BOARD FOR PROFESSIONAL
ENGINEERS, LAND SURVEYORS AND GEOLOGISTS**

TITLE 49 PA CODE CHAPTER 37

§§ 37.16, 37.31, 37.32, 37.33, 37.33a and 37.47

ENGINEER INTERNS

The State Registration Board for Professional Engineers, Land Surveyors and Geologists (board) hereby amends §§ 37.16, 37.31, 37.32, 37.33, 37.33a and 37.47, to read as set forth in Annex A.

Effective Date

The amendments in this final-omitted rulemaking will be effective upon publication in the *Pennsylvania Bulletin*.

Statutory Authority

Subsection 4(l) of the Engineer, Land Surveyor and Geologist Registration Law (act) (63 P.S. § 151(l)) authorizes the board to adopt and promulgate administrative rules and regulations, not inconsistent with the act, as are deemed necessary and proper by the board to carry into effect the powers conferred by the act.

Omission of Proposed Rulemaking

Section 204 of the Commonwealth Documents Law (CDL) (45 P.S. § 1204) authorizes the board to omit the procedures for proposed rulemaking in sections 201 and 202 of the CDL (45 P.S. §§ 1201 and 1202) pursuant to 45 P.S. § 1204(3) if the board “for good cause finds . . . that the procedures specified in sections 201 and 202 are in the circumstances impracticable, unnecessary, or contrary to the public interest.” The board may also omit the procedures for proposed rulemaking if the regulation or change therein relates to “the interpretation of a self-executing act of Assembly or administrative regulation.” 45 P.S. § 1204(1)(v).

Background and Purpose

This rulemaking conforms the board’s existing regulations with certain recent amendments to the act, namely, amendments resulting from the act of June 28, 2024 (P.L. 421, No. 32) (Act

32).

To become licensed as a professional engineer in Pennsylvania, individuals must obtain a bachelor's degree in engineering from an academic program accredited by the Accreditation Board for Engineering and Technology (ABET), and must take and pass the Fundamentals of Engineering (FE) examination. After passing the FE examination, individuals can apply to the board for their engineer-in-training (now “engineer intern”) certificate. Before an engineer-in-training can become licensed as a professional engineer, they must have acquired 4 years of progressive engineering experience under a licensed professional engineer, and must take and pass another exam, the Principles and Practice of Engineering (PE) examination. The FE and PE examinations are designed, developed and scored by the National Council of Examiners for Engineering and Surveying (NCEES) and administered by Pearson VUE.

Land surveyors must follow a similar path, including meeting certain education requirements, passing the Fundamentals of Surveying (FS) examination, obtaining a surveyor-in-training certificate, acquiring 4 years of progressive experience in land surveying work performed under a licensed professional land surveyor, and passing the Principles and Practice of Surveying (PS) examination. The FS and PS examinations are also designed, developed and scored by the NCEES and administered by Pearson VUE.

Act 32 eliminated the term “engineer-in-training” and replaced it with “engineer intern,” the term preferred and favored by NCEES. Act 32 also eliminated the requirement that engineers-in-training and land surveyors-in-training obtain 4 years of experience *after the issuance of their training certificate*. As the legislation's sponsor indicated, this provision made the licensing process unnecessarily difficult for some applicants, namely, individuals who had the necessary

years of experience and training but were unable to have all of the time counted towards licensure because some of it occurred prior to obtaining their training certificate. By removing the requirement for engineer-in-training and surveyor-in-training certificate holders to demonstrate 4 years of experience acquired *after* obtaining their training certificate, Act 32 streamlines the licensing process for professional engineers and land surveyors in this Commonwealth. Under Act 32, 4 years of experience is still required but engineers-in-training and land surveyors-in-training can now have all qualified experience applied towards licensure as an engineer or land surveyor, respectively, regardless of whether it was earned before or after the training certificate was issued.

Description of Amendments

The board is amending §§ 37.16, 37.31, 37.32, 37.33 and 37.33a by replacing 21 instances of the term “engineer-in-training” in those sections with “engineer intern.”

The rulemaking further amends § 37.31(a)(2) to remove the connection between the timing of the issuance of a training certificate and an engineer-in-training’s ability to begin accumulating the necessary years of experience. A similar amendment is made to § 37.47(2) for land surveyors-in-training, severing the connection between the timing of the issuance of a surveyor-in-training certificate and a surveyor-in-training’s ability to begin accumulating the 4 years of experience needed for licensure as a professional land surveyor.

In making these amendments, it is the board’s goal to avoid the confusion that can often arise when regulations do not reflect recent statutory changes to an act. Updating a regulation to align with the language of the statute is crucial for maintaining clarity and consistency. This, in turn, boosts stakeholders’ confidence in both the law and the regulations because they know they can rely on the regulations as being consistent with the intent of the statute. Updating regulations in

this manner also helps to limit the types of misinterpretations that can occur when the language of the regulation differs significantly from the language of the statute.

Fiscal Impact and Paperwork Requirements

There is no fiscal impact and no paperwork requirements associated with this final-omitted rulemaking, which conforms the board’s regulations to current statutory provisions.

Regulatory Review

Under section 5.1(c) of the Regulatory Review Act (71 P.S. § 745.5a(c)), on December 9, 2025, the board submitted copies of the regulation, with proposed rulemaking omitted, to the Independent Regulatory Review Commission (IRRC), and the respective chairpersons of the Consumer Protection and Professional Licensure Committee of the Senate (SCP/PLC) and the Professional Licensure Committee of the House of Representatives (HPLC). On the same date, the board submitted a copy of the regulation to the Office of Attorney General under section 204(b) of the Commonwealth Attorneys Act (71 P.S. § 732-204(b)).

Under sections 5.1(e) and (j.2) of the RRA (71 P.S. § 745.5a(e) and (j.2)), the amendments were deemed approved by the SCP/PLC and the HPLC on _____, 2025, and approved by IRRC on _____, 2025.

Additional Information

Additional information may be obtained by writing to Kristel Hennessy Hemler, Board Administrator, State Registration Board for Professional Engineers, Land Surveyors and Geologists, P.O. Box 2649, Harrisburg, PA 17105-2649, or by email to ST-Engineer@pa.gov.

Findings

The board finds that:

- (1) Public notice of the board’s intention to amend its regulations under the procedures in sections 201 and 202 of the Commonwealth Documents Law (45 P.S. §§ 1201 and 1202) has been properly omitted for good cause under section 204 of the CDL (45 P.S. § 1204) because publication of proposed rulemaking and public comment is unnecessary given that the amendments adopted by this order are required to conform to the amendments to the Engineer, Land Surveyor and Geologist Registration Law.
- (2) The amendment of the board’s regulations in the manner provided in this order is necessary and appropriate for the administration of the Engineer, Land Surveyor and Geologist Registration Law.

Order

The board, acting under its authorizing statute, orders that:

- (a) The regulations of the board at 49 Pa. Code §§ 37.16, 37.31, 37.32, 37.33, 37.33a and 37.47 are hereby amended to read as set forth in Annex A.
- (b) The board shall submit a copy of this final-omitted regulation to the Office of General Counsel and the Office of Attorney General for approval as to form and legality as required by law.
- (c) The board shall submit this final-form regulation to the Independent Regulatory Review Commission, the Senate Consumer Protection and Professional Licensure Committee and the House Professional Licensure Committee as required by law.
- (d) The board shall certify this final-omitted regulation and deposit it with the Legislative Reference Bureau as required by law.

- (e) This order shall take effect upon publication in the *Pennsylvania Bulletin*.

Robert P. Kudlawiec, PE
President
State Registration Board for Professional
Engineers, Land Surveyors and Geologists

Annex A

TITLE 49. PROFESSIONAL AND VOCATIONAL STANDARDS

PART I. DEPARTMENT OF STATE

Subpart A. PROFESSIONAL AND OCCUPATIONAL AFFAIRS

**CHAPTER 37. STATE REGISTRATION BOARD FOR
PROFESSIONAL ENGINEERS, LAND SURVEYORS AND GEOLOGISTS**

QUALIFICATIONS FOR LICENSURE

§ 37.16. General information; application and examination.

(a) *Applications.* Applications to take a licensing examination to be certified as an [engineer-in-training] engineer intern, surveyor-in-training or geologist-in-training, or to be licensed as a professional engineer, professional land surveyor or professional geologist shall be submitted directly to the Administrative office of the Board at Post Office Box 2649, Harrisburg, Pennsylvania 17105-2649. Applications shall be submitted with the appropriate application fee in § 37.17 (relating to schedule of fees) and required supporting documentation. Application fees are nonrefundable and nontransferrable.

* * * * *

REGISTERED PROFESSIONAL ENGINEERS

§ 37.31. Requirements for certification as an [engineer-in-training] engineer intern and for licensure as a professional engineer.

(a) The following requirements apply to a candidate who received a qualifying academic degree on or after June 30, 1994, or who began acquiring qualifying experience on or after February 19, 1991.

(1) *[Engineer-in-training]* **Engineer Intern**. A candidate for certification as an **[engineer-in-training] engineer intern** shall be of good moral character and achieve a passing score on the NCEES fundamentals of engineering examination. To qualify for the fundamentals of engineering examination, the candidate shall possess one of the following qualifications:

- (i) Graduation from an undergraduate engineering curriculum in the United States accredited by ABET. A student who has completed 2 years in an ABET-accredited undergraduate curriculum in the United States and has maintained current enrollment may, with Board approval, sit for the fundamentals of engineering examination, but will not be eligible for certification as an **[engineer-in-training] engineer intern** until the student provides proof of graduation. The effective date of certification will be the later of the date of graduation or the date of notification from NCEES of achieving a passing score on the fundamentals of engineering examination.
- (ii) Graduation from an ABET-accredited graduate-level engineering curriculum in the United States or from a foreign ABET-accredited undergraduate or graduate engineering curriculum. Enrollment in a graduate-level or foreign engineering curriculum does not authorize the student to sit for the fundamentals of engineering examination prior to graduation.
- (iii) Graduation from both a graduate-level engineering curriculum at a college or university in the United States and from an undergraduate engineering

curriculum at a college or university in the United States that was substantially equivalent to an ABET-accredited curriculum, as shown by an evaluation of the candidate's credentials by NCEES's credentials evaluation division.

- (iv) Graduation from a foreign undergraduate or graduate, or both, engineering curriculum that was substantially equivalent to an ABET-accredited curriculum, as shown by an evaluation of the candidate's credentials by NCEES's credentials evaluation division.
- (v) Eight years of progressive experience in engineering work and knowledge, skill and education approximating that attained through graduation from an approved engineering curriculum. The experience must be of a grade and character sufficient to enable the candidate to independently learn through practice the principles of mathematics and science attained through formal education. Academic training in engineering subjects may be counted towards the experience requirement.

(2) *Professional engineer.* A candidate for licensure as a professional engineer shall be of good moral character, be certified as an **[engineer-in-training]** **engineer intern** in this Commonwealth or another jurisdiction having satisfied the requirements under paragraph (1) to sit for the fundamentals of engineering examination, and achieve a passing score on the NCEES principles and practice of engineering examination in one of the branches of engineering as listed in § 37.34 (relating to branches of engineering). Unless otherwise stated by the appropriate licensing authority of that jurisdiction, the effective date of the **[engineer-**

in-training] **engineer intern** certificate of a candidate who was certified in a jurisdiction other than this Commonwealth will be the date the certificate was first issued. To qualify for the principles and practice examination, the **[engineer-in-training]** **engineer intern** shall have obtained one of the following experience qualifications **[after the effective date of the engineer-in-training certificate and]** before the submission of the examination application:

- (i) Four years of progressive experience in a major branch of engineering, acquired under the supervision of a professional engineer licensed in the United States or an engineer who, through education and experience, possesses the equivalent level of expertise as that of a professional engineer licensed in the United States. The experience must be of a grade and character to qualify the candidate to assume responsible charge of the work involved in the practice of the major branch of engineering in which the candidate indicates proficiency. For sales, construction and similar nondesign experience to be acceptable, the candidate shall demonstrate that engineering principles and engineering knowledge were actually employed. Unacceptable experience includes the selection of data or equipment from a company catalog or similar publication, the execution as a contractor of work designed by a professional engineer, the supervision of construction work as a superintendent and the operation or maintenance of machinery or equipment. The candidate shall support all work experience, regardless of duration, with adequate references.
- (ii) Four years of progressive full-time teaching experience in an ABET-

accredited engineering curriculum under the supervision of a professional engineer or an engineer who, through education and experience, possesses the equivalent level of expertise as a professional engineer. The experience must include the teaching of engineering courses at the third-year, fourth-year or graduate level, covering the breadth and depth of the curriculum, and be of a grade and character to qualify the candidate to assume responsible charge of the work involved in the practice of engineering.

(3) A post-baccalaureate engineering degree may be substituted for each year of experience required under paragraph (2), up to a maximum of 2 years, if the following conditions are met:

- (i) The degree is from an academic institution that has an ABET-accredited undergraduate curriculum.
- (ii) The degree is in the same discipline as an earned undergraduate degree.
- (iii) The academic time is not concurrent with earned experience.

(b) A candidate who received a qualifying academic degree before June 30, 1994, or who began acquiring qualifying experience before February 19, 1991, may apply under § 37.33 or § 37.33a (relating to grandfather requirements for certification as an **[engineer-in-training]** **engineer intern** and for licensure as a professional engineer; and grandfather requirements for licensure as a professional engineer without certification as an **[engineer-in-training]** **engineer intern**), as appropriate.

§ 37.32. References for certification as an [engineer-in-training] engineer intern or licensure as a professional engineer.

(a) A candidate for licensure as a professional engineer, and a candidate for certification as an [engineer-in-training] engineer intern who seeks to qualify for the examination based on experience, shall provide as references the names and addresses of at least five persons who can attest to the candidate's good moral character and who either directly supervised the candidate or can otherwise verify the candidate's experience. At least three of the references shall be professional engineers licensed in the United States who are unrelated to the candidate. The remaining references may be professional land surveyors, professional geologists or unlicensed engineers who, through education and experience, possess an equivalent level of expertise as that of a professional engineer. A reference who is not a professional engineer licensed in the United States is required to submit a curriculum vitae.

(b) If, in the opinion of the Board, the references adversely reflect on the candidate's character or qualifications, the Board may withhold processing the candidate's application until an investigation into the candidate's character or qualifications, or both, is completed. The candidate will be notified in writing of any investigation that is being conducted. Based on the results of the investigation, the Board may require the candidate to submit additional references.

§ 37.33. Grandfather requirements for certification as an [engineer-in-training] engineer intern and for licensure as a professional engineer.

(a) *Scope.* This section applies to a candidate for certification as an [engineer-in-training] engineer intern and subsequent licensure as a professional engineer who received a qualifying academic degree before June 30, 1994, or who began acquiring qualifying experience before

February 19, 1991.

(b) ~~[*Engineer-in-training*]~~ *Engineer intern*. A candidate for certification as an ~~[*engineer-in-training*]~~ *engineer intern* under this subsection shall be of good moral character and achieve a passing score on the NCEES fundamentals of engineering examination, except that completion of the fundamentals of engineering examination is not required of a candidate who received a qualifying academic degree before January 1, 1968. To qualify for the fundamentals of engineering examination, the candidate shall possess one of the following qualifications:

(1) Graduation from an undergraduate or graduate-level engineering curriculum in the United States accredited by ABET or graduation from a foreign undergraduate or graduate-level engineering curriculum accredited by ABET.

(2) Graduation from both a graduate-level engineering curriculum at a college or university in the United States and from an undergraduate engineering curriculum at a college or university in the United States that was substantially equivalent to an ABET-accredited curriculum, as shown by an evaluation of the candidate's credentials by NCEES's credentials evaluation division.

(3) Graduation from a foreign undergraduate or graduate, or both, engineering curriculum that was substantially equivalent to an ABET-accredited curriculum, as shown by an evaluation of the candidate's credentials by NCEES's credentials evaluation division.

(4) Four years of experience in engineering work, having acquired knowledge, skill and education approximating that attained through graduation from an approved engineering curriculum. Experience used to satisfy this requirement may not also be used to satisfy the experience requirements of subsection (c)(1)(iii).

(c) *Professional engineer.* A candidate for licensure as a professional engineer under this subsection shall be of good moral character and achieve a passing score on the NCEES principles and practice examination in one of the branches of engineering.

(1) To qualify for the principles and practice examination, the candidate shall:

- (i) Possess an **[engineer-in-training] engineer intern** certificate in this Commonwealth or another jurisdiction.
- (ii) Satisfy the requirements under subsection (b) to sit for the fundamentals of engineering examination.
- (iii) Have at least 4 years of progressive engineering or teaching experience.

(2) The engineering and teaching experience required under this subsection must comply with the standards in § 37.31(a)(2)(i) and (ii) (relating to requirements for certification as an **[engineer-in-training] engineer intern** and for licensure as a professional engineer). A candidate may not substitute a post-baccalaureate engineering degree for any part of the required experience.

§ 37.33a. Grandfather requirements for licensure as professional engineer without certification as an **[engineer-in-training] engineer intern.**

(a) *Scope.* A candidate who began acquiring qualifying experience before February 19, 1991, may apply for licensure as a professional engineer without being certified as an **[engineer-in-training] engineer intern** by satisfying the requirements of this section.

(b) *Qualifications.* A candidate for licensure as a professional engineer shall be of good moral character and have had 12 years or more of progressive experience in engineering work, at least 8 years of which must comply with the standards in § 37.31(a)(2) (relating to requirements for certification as an **[engineer-in-training] engineer intern** and for licensure as a professional

engineer).

(c) *Examinations.* A candidate who has satisfied the requirements of subsection (b) will be licensed as a professional engineer upon achieving a passing score on the NCEES fundamentals of engineering examination and the NCEES principles and practice examination in one of the branches of engineering. A candidate may not be admitted to sit for the principles and practice of engineering examination until achieving a passing score on the fundamentals of engineering examination.

REGISTERED PROFESSIONAL LAND SURVEYORS

§ 37.47. Requirements for certification as a surveyor-in-training and for licensure as a professional land surveyor.

The following requirements apply to a candidate who received a qualifying academic degree on or after June 30, 1994, or who began obtaining qualifying experience on or after February 19, 1991.

(1) *Surveyor-in-training.* A candidate for certification as a surveyor-in-training shall be of good moral character and achieve a passing score on the NCEES fundamentals of surveying examination. To qualify for the fundamentals of surveying examination, the candidate shall possess one of the following qualifications:

- (i) Graduation from an undergraduate civil engineering curriculum in the United States accredited by ABET, including a minimum of 10 credit hours of instruction in surveying or graduation from an undergraduate 4-year surveying curriculum in the United States accredited by ABET. A student who has completed 2 years of a 4-year surveying curriculum and has

maintained current enrollment may, with Board approval, sit for the fundamentals of surveying examination, but will not be eligible for certification as a surveyor-in-training until the student provides proof of graduation. The effective date of certification will be the later of the date of graduation or the date of notification from NCEES of achieving a passing score on the fundamentals of surveying examination.

- (ii) Graduation from an associate's degree program in a surveying technology curriculum accredited by ABET.
- (iii) Six years of progressive experience in surveying, and knowledge, skill and education equivalent to that attained through graduation from an approved land surveying or civil engineering curriculum. The experience must reflect diversification of field and office work, with no less than 25% of the experience in either area and be of a grade and character sufficient to enable the candidate to independently learn through practice the surveying skills and principles of mathematics attained through formal education.

(2) *Professional land surveyor.* A candidate for licensure as a professional land surveyor shall be of good moral character, be certified as a surveyor-in-training and achieve a passing score on the NCEES principles and practice of surveying examination. Unless otherwise stated by the appropriate licensing authority of that jurisdiction, the effective date of the surveyor-in-training certificate of a candidate who was certified in a jurisdiction other than this Commonwealth will be the date the certificate was first issued. To qualify for the principles and practice examination, the surveyor-in-training shall have obtained one of the following experience qualifications **[between**

the effective date of the surveyor-in-training certificate and] before the submission of the examination application:

- (i) Four years of progressive experience in surveying work acquired under the supervision of a professional land surveyor or a land surveyor who, through education and experience, possesses the equivalent level of expertise as that of a professional land surveyor. The experience shall be of a grade and character to qualify the candidate to assume responsible charge of the work involved in the practice of land surveying.
- (ii) Four years of progressive full-time faculty teaching experience in a surveying curriculum accredited by ABET under the supervision of a professional land surveyor or a surveyor who, through education and experience, possesses the equivalent level of expertise as a professional land surveyor. The experience must include the teaching of surveying courses at the third-year, fourth-year or graduate level, covering the breadth and depth of the curriculum, and be of a grade or character to qualify the candidate to assume responsible charge of the work involved in the practice of land surveying.



**COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE
BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS
STATE REGISTRATION BOARD FOR PROFESSIONAL ENGINEERS,
LAND SURVEYORS AND GEOLOGISTS
Post Office Box 2649
Harrisburg, Pennsylvania 17105-2649
1-833-367-2762**

December 9, 2025

The Honorable George D. Bedwick, Chairman
INDEPENDENT REGULATORY REVIEW COMMISSION
Forum Place
555 Walnut Street, Suite 804
Harrisburg, PA 17101

Re: Final-Omitted Rulemaking
State Registration Board for Professional Engineers, Land Surveyors and
Geologists
16A-4717: Engineer Interns

Dear Chairman Bedwick:

Enclosed is a copy of a Final-Omitted rulemaking package of the State Registration Board for Professional Engineers, Land Surveyors and Geologists pertaining to Engineer Interns.

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 black ink, appearing to read "Robert P. Kudlawiec".

Robert P. Kudlawiec, Chairperson
State Registration Board for Professional Engineers,
Land Surveyors and Geologists

RPK/MJF/ag
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
Ashley Goshert, Board Counsel
State Registration Board for Professional Engineers, Land Surveyors and Geologists

RECEIVED

Independent Regulatory
Review Commission

December 9, 2025

From: [Smeltz, Jennifer](#)
To: [Gelal, Arjun](#)
Subject: RE: DELIVERY NOTICE OF: REGULATION # 16A-4717 Engineer Interns (Final-Omitted)
Date: Tuesday, December 9, 2025 12:13:38 PM
Attachments: [image001.png](#)

Received.

*Jen Smeltz, Executive Director
Consumer Protection and Professional Licensure Committee
Office of Senator Pat Stefano
Phone: (717) 787-7175*

From: Gelal, Arjun <agelal@pa.gov>
Sent: Tuesday, December 9, 2025 11:52 AM
To: Smeltz, Jennifer <jmsmeltz@pasen.gov>
Cc: Roland, Joel <joeroland@pa.gov>; Worthington, Amber <agontz@pa.gov>
Subject: DELIVERY NOTICE OF: REGULATION # 16A-4717 Engineer Interns (Final-Omitted)
Importance: High

● CAUTION : External Email ●

Please be advised that the State Registration Board for Professional Engineers, Land Surveyors and Geologists (Board) is electronically delivering the below-identified final omitted rulemaking today (Tuesday, December 9, 2025).

- **16A-4717 (Engineer Interns)**

This rulemaking conforms existing regulations of the State Registration Board for Professional Engineers, Land Surveyors and Geologists (board) to recent amendments to the Engineer, Land Surveyor and Geologist Registration Law, resulting from the act of June 28, 2024 (P.L. 421, No. 32) (Act 32). Act 32 replaced the term “engineer-in-training” with “engineer intern” – a title recommended by the National Council of Examiners for Engineering and Surveying (NCEES). The rulemaking also aligns with Act 32’s change regarding the timing of when engineers-in-training and surveyors-in-training may commence obtaining the 4 years of work experience needed for licensure as a professional engineer or land surveyor.

The Board is 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 delivery.

Thank you for your attention to this matter.



Arjun K. Gelal | Legal Assistant II (*he/him/his*)
Office of Chief Counsel | Department of State
Governor’s Office of General Counsel
2400 Thea Drive, Suite 201 | Harrisburg, PA 17110
Mailing Address: P.O. Box 69523 | Harrisburg, PA 17110-9523
Phone: 717.783-7200 | Fax: 717.787-0251
dos.pa.gov | vote.pa.gov | [Facebook](#) | [Twitter](#)

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RECEIVED

Independent Regulatory
Review Commission

December 9, 2025

From: [Monoski, Jesse](#)
To: [Gelal, Arjun](#); [Dimm, Ian](#); [Kelly, Joseph](#); [Vazquez, Enid](#)
Cc: [Roland, Joel](#); [Worthington, Amber](#)
Subject: RE: DELIVERY NOTICE OF: REGULATION # 16A-4717 Engineer Interns (Final-Omitted)
Date: Tuesday, December 9, 2025 12:45:35 PM
Attachments: [jimage001.png](#)

Arjun –

Received. Thank you.

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

From: Gelal, Arjun <agelal@pa.gov>
Sent: Tuesday, December 9, 2025 11:52 AM
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 <jjoeroland@pa.gov>; Worthington, Amber <agontz@pa.gov>
Subject: DELIVERY NOTICE OF: REGULATION # 16A-4717 Engineer Interns (Final-Omitted)
Importance: High

EXTERNAL EMAIL

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Thank you for your attention to this matter.



Arjun K. Gelal | Legal Assistant II (*he/him/his*)
Office of Chief Counsel | Department of State
Governor's Office of General Counsel
2400 Thea Drive, Suite 201 | Harrisburg, PA 17110

RECEIVED

Independent Regulatory
Review Commission

December 9, 2025

From: [Orchard, Kari L.](#)
To: [Gelal, Arjun](#); [Barton, Jamie](#); [Brett, Joseph D.](#)
Cc: [Roland, Joel](#); [Worthington, Amber](#)
Subject: RE: DELIVERY NOTICE OF: REGULATION # 16A-4717 Engineer Interns (Final-Omitted)
Date: Tuesday, December 9, 2025 12:10:29 PM
Attachments: [jimage001.png](#)

Received – thank you!

Kari Orchard

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

From: Gelal, Arjun <agelal@pa.gov>
Sent: Tuesday, December 9, 2025 11:53 AM
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: REGULATION # 16A-4717 Engineer Interns (Final-Omitted)
Importance: High

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Arjun K. Gelal | Legal Assistant II (*he/him/his*)
Office of Chief Counsel | Department of State
Governor’s Office of General Counsel
2400 Thea Drive, Suite 201 | Harrisburg, PA 17110
Mailing Address: P.O. Box 69523 | Harrisburg, PA 17110-9523
Phone: 717.783-7200 | Fax: 717.787-0251
[dos.pa.gov](#) | [vote.pa.gov](#) | [Facebook](#) | [Twitter](#)

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Independent Regulatory
Review Commission

December 9, 2025

From: [Emily Hackman](#)
To: [Cindy Sauder](#); [Gelal, Arjun](#)
Subject: RE: [EXTERNAL]: RE: DELIVERY NOTICE OF: REGULATION # 16A-4717 Engineer Interns (Final-Omitted)
Date: Tuesday, December 9, 2025 3:29:51 PM
Attachments: [image001.png](#)

Notice received! Thank you.

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

From: Cindy Sauder <Csauder@pahousegop.com>
Sent: Tuesday, December 9, 2025 3:10 PM
To: Gelal, Arjun <agelal@pa.gov>
Cc: Emily Hackman <Ehackman@pahousegop.com>
Subject: RE: [EXTERNAL]: RE: DELIVERY NOTICE OF: REGULATION # 16A-4717 Engineer Interns (Final-Omitted)

Good afternoon,

Emily Hackman is receiving regulation notices while Nicole Sidle is on maternity leave. I am cc'ing her on this email.

Thank you.

Cindy Sauder

Administrative Assistant
Office of Rep. Joe Emrick, Chairman
Professional Licensure
401 Irvis Office Building
717-260-6159

From: Gelal, Arjun <agelal@pa.gov>
Sent: Tuesday, December 9, 2025 3:07 PM
To: Nicole Sidle <Nsidle@pahousegop.com>; Cindy Sauder <Csauder@pahousegop.com>
Cc: Roland, Joel <joeroland@pa.gov>; Worthington, Amber <agontz@pa.gov>
Subject: [EXTERNAL]: RE: DELIVERY NOTICE OF: REGULATION # 16A-4717 Engineer Interns (Final-Omitted)
Importance: High

Good Afternoon!

Just a follow-up email for a confirmation from your office that you've received the delivery of the below regulation.

Thank you.

-Arjun

From: Gelal, Arjun
Sent: Tuesday, December 9, 2025 11:53 AM
To: Nsidle@pahousegop.com; Csauder@pahousegop.com
Cc: Roland, Joel <joeroland@pa.gov>; Worthington, Amber <agontz@pa.gov>
Subject: DELIVERY NOTICE OF: REGULATION # 16A-4717 Engineer Interns (Final-Omitted)
Importance: High

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Thank you for your attention to this matter.

RECEIVED

Independent Regulatory
Review Commission



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Office of Chief Counsel | Department of State
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December 9, 2025

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From: [Abelson, Addie](#)
To: [Gelal, Arjun](#); [Keys, Jaclyn \(GC\)](#); [GC, Regulations](#); [Montgomery, Cynthia](#)
Cc: [Roland, Joel](#); [Worthington, Amber](#)
Subject: RE: DELIVERY NOTICE OF: REGULATION # 16A-4717 Engineer Interns (Final-Omitted)
Date: Tuesday, December 9, 2025 2:59:46 PM
Attachments: [Re FINAL-OMITTED #16A-4717 Engineer Interns \(Response required\).msg](#)
[image004.png](#)

Independent Regulatory
Review Commission
December 9, 2025

Hi Arjun:

Attached please find OAG's confirmation.



Addie A. Abelson

Deputy General Counsel
Office of General Counsel
30 N. 3rd Street, Suite 200
Harrisburg, PA 17101
Phone: (717) 214-9535

PRIVILEGED AND CONFIDENTIAL COMMUNICATION

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From: Gelal, Arjun <agelal@pa.gov>
Sent: Tuesday, December 9, 2025 12:01 PM
To: Abelson, Addie <adabelson@pa.gov>; Keys, Jaclyn (GC) <jackkeys@pa.gov>; GC, Regulations <RA-GCREGULATIONS@pa.gov>; Montgomery, Cynthia <cymontgome@pa.gov>
Cc: Roland, Joel <joeroland@pa.gov>; Worthington, Amber <agontz@pa.gov>
Subject: DELIVERY NOTICE OF: REGULATION # 16A-4717 Engineer Interns (Final-Omitted)
Importance: High

Please effectuate and confirm delivery of the attached zip file to the Office of the Attorney General as part of the delivery described below.

Please be advised that the State Registration Board for Professional Engineers, Land Surveyors and Geologists (Board) is electronically delivering the below-identified final omitted rulemaking today (Tuesday, December 9, 2025).

- **16A-4717** (Engineer Interns)

This rulemaking conforms existing regulations of the State Registration Board for Professional Engineers, Land Surveyors and Geologists (board) to recent amendments to the Engineer, Land Surveyor and Geologist Registration Law, resulting from the act of June 28, 2024 (P.L. 421, No. 32) (Act 32). Act 32 replaced the term “engineer-in-training” with “engineer intern” – a title recommended by the National Council of Examiners for Engineering and Surveying (NCEES). The rulemaking also aligns with Act 32’s change regarding the timing of when engineers-in-training and surveyors-in-training may commence obtaining the 4 years of work experience needed for licensure as a professional engineer or land surveyor.

The Board is requesting a written (email) confirmation of receipt of this delivery from the designated contact person(s) from your office along with confirmation that the delivery has been accepted by the Office of Attorney General effectuating the electronic delivery.

RECEIVED

Independent Regulatory
Review Commission

December 9, 2025

Thank you for your attention to this matter.



Arjun K. Gelal | Legal Assistant II (*he/him/his*)
Office of Chief Counsel | Department of State
Governor's Office of General Counsel
2400 Thea Drive, Suite 201 | Harrisburg, PA 17110
Mailing Address: P.O. Box 69523 | Harrisburg, PA 17110-9523
Phone: 717.783-7200 | Fax: 717.787-0251
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RECEIVED

From: [Elliott, Amy M.](#)
To: [Abelson, Addie](#); [Trotter, Carolyn](#)
Cc: [Montgomery, Cynthia](#); [GC, Regulations](#)
Subject: Re: FINAL-OMITTED: #16A-4717 Engineer Interns (Response required)
Date: Tuesday, December 9, 2025 2:58:35 PM

Independent Regulatory
Review Commission

December 9, 2025

Receipt acknowledged.

From: Abelson, Addie <adabelson@pa.gov>
Sent: Tuesday, December 9, 2025 1:48 PM
To: Elliott, Amy M. <aelliott@attorneygeneral.gov>; Trotter, Carolyn <ctrotter@attorneygeneral.gov>
Cc: Montgomery, Cynthia <cymontgome@pa.gov>; GC, Regulations <RA-GCREGULATIONS@pa.gov>
Subject: FINAL-OMITTED: #16A-4717 Engineer Interns (Response required)

***** Please confirm your receipt of this final-omitted rulemaking so that we can complete delivery. *****

Good afternoon, Amy:

Attached for your review is a final omitted regulation that has been reviewed and approved by the Office of General Counsel. At the same time, the regulation has also been delivered to the House and Senate Committees and the Independent Regulatory Review Commission.

Department of State

Bureau of Professional and Occupational Affairs

49 Pa. Code §§ 37.16, 37.31, 37.32, 37.33, 37.33a and 37.47 Engineer Interns

ENGINEER INTERNS

Please confirm your receipt of this final-omitted rulemaking so that we can complete delivery.

Thank you for your review.

Warm regards,



Addie A. Abelson

Deputy General Counsel

Office of General Counsel

30 N. 3rd Street, Suite 200

Harrisburg, PA 17101

Phone: (717) 214-9535

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