

# STATE OF NEW HAMPSHIRE

## Inter-Department Communication

**DATE:** March 7, 2022

**FROM:** Michael A. Morrell  
Acting Administrative Rules Director

**AT (OFFICE):** Legislative Services

**SUBJECT:** Final Proposal 2021-17 Annual In-Service Training

Attached are Kim Reeve's comments on Final Proposal 2021-17 from the Police Standards and Training Commission (PSTC) relative to the re-adoption with amendments of Pol 403.01 on annual in-service training. Pol 403.01 is currently a regular rule which is scheduled to expire 11-16-26.

The substantive comment on page 1 relates to lack of clarity and legislative intent in the rule due to the possibility of violating Part 1, Article 23 of the N.H. Constitution by establishing a retrospective requirement.