

# STATE OF NEW HAMPSHIRE

## Inter-Department Communication

**DATE:** July 13, 2022

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

**AT (OFFICE):** Legislative Services

**SUBJECT:** Final Proposal 2022-54 NH Office of Professional Licensure Procedural Rules

**To:** File

Attached are Rebecca Ricard's comments on Final Proposal 2022-54 from the Office of Professional Licensure regarding readoption with amendment Plc 200 through 2011 and adopt Plc 212 and 213, rules on procedure requirements.

There are substantive comments on pages 14 and 25. In addition, there are two notes to JLCAR, one on page 1 and one on page 36. The first substantive comment is due to the paragraph being too long. The second comment is for a lack of criteria to determine whether to grant or deny a motion for reconsideration or rehearing. Additionally, there are several editorial comments made through out the proposal.

The notes to JLCAR relate to the potential need for legislative clarification on what authority the Office of Professional Licensure has over the boards, councils, or commissions and what authority it has over those entities' licensees.