



State of Vermont
Office of the Secretary of State
Office of Professional Regulation
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Sarah Copeland Hanzas, Secretary of State
S. Lauren Hibbert, Deputy Secretary
Kevin A. Rushing, Director

Rep. Trevor Squirrell, Chair
Legislative Committee on Administrative Rules
c/o Charlene Dindo, Committee Assistant
Vermont State House
Montpelier, Vermont 05602

October 2, 2023

Re: Extension to File Adoption of Rules 22-P026 and 22-P027 with Secretary of State

Dear Rep. Squirrell and Committee Members,

I write to ask the Legislative Committee on Administrative Rules to grant the Office of Professional Regulation (OPR) additional time to adopt Rule 22-P026, the *Rule on Alternative Preparatory Paths for Funeral Directors and Embalmers*, and Rule 22-P027, the *Administrative Rules for Notary Public Continuing Education* (collectively, the “Rules”). OPR requests until October 11, 2023 to adopt the Rules.

LCAR previously granted OPR an extension of the requirement that rules be adopted within eight months from the date of the initial filing. 3 V.S.A. § 843(c). That extension required OPR to finalize the adoption of the 22-P026 and 22-P027 by September 21, 2023.

OPR then granted LCAR’s request for a 45-day extension for hearing these rules. The Committee then reviewed the rules at its meeting on September 21, 2023 and had no objections. The memoranda issued following LCAR’s September 21, 2023 meeting provided that OPR had until September 28, 2023 to adopt 22-P026 and 22-P027. Unfortunately, I missed seeing that deadline and, in turn, failed to file the final adopted rule paperwork in time.

It is my hope that LCAR will grant OPR until October 11, 2023 to file the final adoption paperwork with the Secretary of State’s Office so that the efforts of the public and OPR in developing these rules to date will not need to be repeated.

Thank you for your attention to this matter.

Sincerely,

Lauren K. Layman, General Counsel
Office of Professional Regulation