



OFFICE OF PROFESSIONAL REGULATION  
VERMONT SECRETARY OF STATE

# **[Interim] Funding Structure Study**

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## Professional Regulatory Fee Fund

January 2024

*The Office of Professional Regulation, in consultation with the Joint Fiscal Office, shall conduct a study reviewing the funding structure of the Office of Professional Regulation. The Office of Professional Regulation shall report to the House Committee on Government Operations and Military Affairs and the Senate Committee on Government Operations by January 1, 2025 with an assessment of the benefits and challenges of the current funding model for the Office of Professional Regulation, as established in 3 V.S.A. § 124, and with any recommendations for alternative models for funding the Office of Professional Regulation.*

Act 158 of 2024, Sec. 18a

## Executive Summary

**The Office of Professional Regulation (OPR) is responsible for the license administration and conduct enforcement of more than 50 professions and 85,000 licensees in Vermont.** OPR is a special fund agency that relies on fee revenue to fund its budget. Historically, OPR was able to meet its operational costs through licensing revenue and when necessary, fee increases. However, OPR has recently struggled to achieve a balanced budget: **the Office reported net losses totaling more than \$4 million over the last 6 fiscal years.**

### OPR's Funding Model

**3 V.S.A § 124(a) explicitly states that *the cost of regulating a profession should be borne by the profession, and, one profession should not subsidize the cost of regulating another profession.*** Accordingly, the Office maintains 15 siloed funds, one for each of the 14 professional boards, and a fund for the collective advisor professions—pursuant to § 124(b).

However, 95% of OPR's \$8M annual operational expenses are allocated to board funds and the advisor fund indirectly. This means OPR divides the majority of expenses proportional to the total licensed populations in each fund, rather than with consideration to staff time or other resource consumption. Consequently, **it is possible that OPR's current expense allocation model results in some level of regulatory subsidization across professions.**

Additionally, OPR's model—which originated in the 1970s—is no longer relevant to the cost drivers of modern regulatory operations. The indirect expense allocation model risks shifting the cost burdens for software development projects, emergency response efforts, and interstate license compacts, onto professions for whom the project or policy changes are not applicable.

### Information Deficits

**OPR does not have enough data to make evidence-based recommendations at this time.** Given that OPR has always allocated expenses on a proportional basis, the Office has not tracked actual resource consumption by professional regulatory program. **OPR must determine the true regulatory costs associated with each profession before making recommendations** to restructure expense allocation models, for alternative funding models, and/or to determine more appropriate fees.

## Immediate Actions and Interim Recommendations

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**OPR recommends a two-year study period** to collect workforce data related to staff time use, and analyze resource consumption across regulatory programs.

Immediate Recommendations:

- Assign fees to many of the services OPR currently performs for free; and
- Increase license verification fees, which are very low.

Study Period Recommendations:

- Explore the funding models used by similar agencies in other states;
- Explore additional funding opportunities already available in Vermont;
- Study possible statutory strategies to tie fees consistent with inflation; and
- Analyze the costs and benefits of de-siloing the Professional Regulatory Fee Fund.

**OPR has already implemented positive reporting for all employees.** This means that work time is now recorded with regard to the regulatory programs on which staff worked. Likewise, the executive team at the Secretary of State has implemented positive reporting for the time spent on OPR projects. This will provide sufficient data to demonstrate how each licensed profession's fee rate compares to the regulatory program's actual resource use.

OPR looks forward to working with the general assembly to design a sustainable funding solution that allows OPR to continue to protect the public through professional regulation and serve Vermonters' interests.

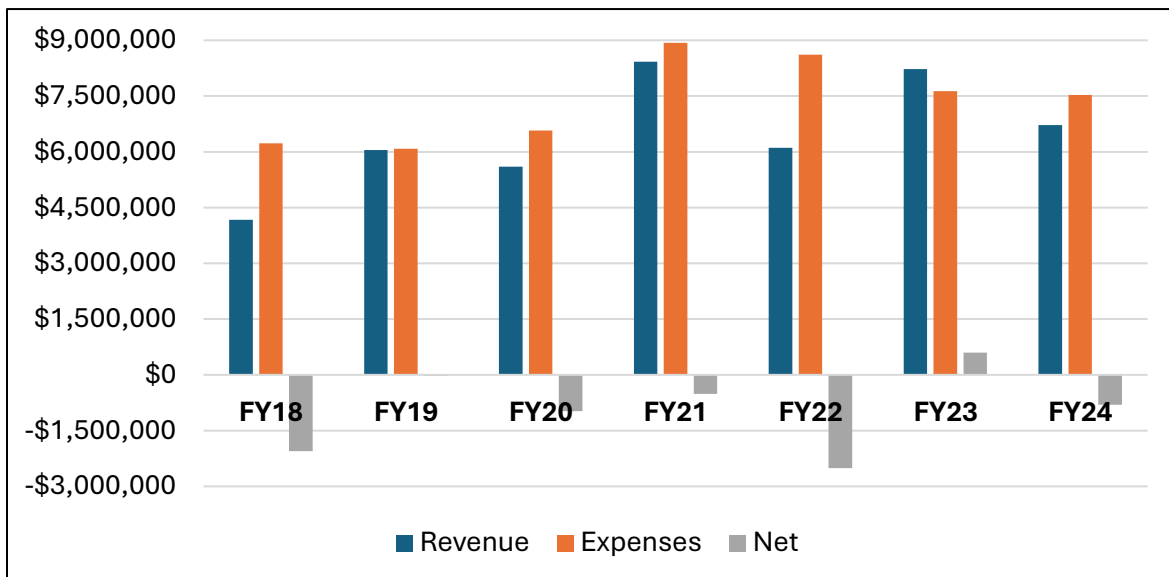
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## Part 1: Introduction

The Office of Professional Regulation (OPR) is responsible for the license administration and conduct enforcement of more than 50 professions and nearly 85,000 licensees in Vermont. OPR is a special fund agency that relies on fee revenue to fund its budget. OPR’s status as a special fund agency ensures that fee revenues are earmarked for professional regulation and cannot be used to subsidize general state operations. Additionally, OPR’s self-funding model provides the Secretary of State with greater independence and flexibility in managing how OPR achieves its mission.

Historically speaking, OPR was always able to meet its operational costs through licensing revenue and when necessary, fee increases. More recently, however, OPR has struggled to achieve a balanced budget: the Office reported a net loss of almost \$4 million over the last six fiscal years. At the end of fiscal year 2024, the Professional Regulatory Fee Fund had a deficit of approximately \$2.1 million.



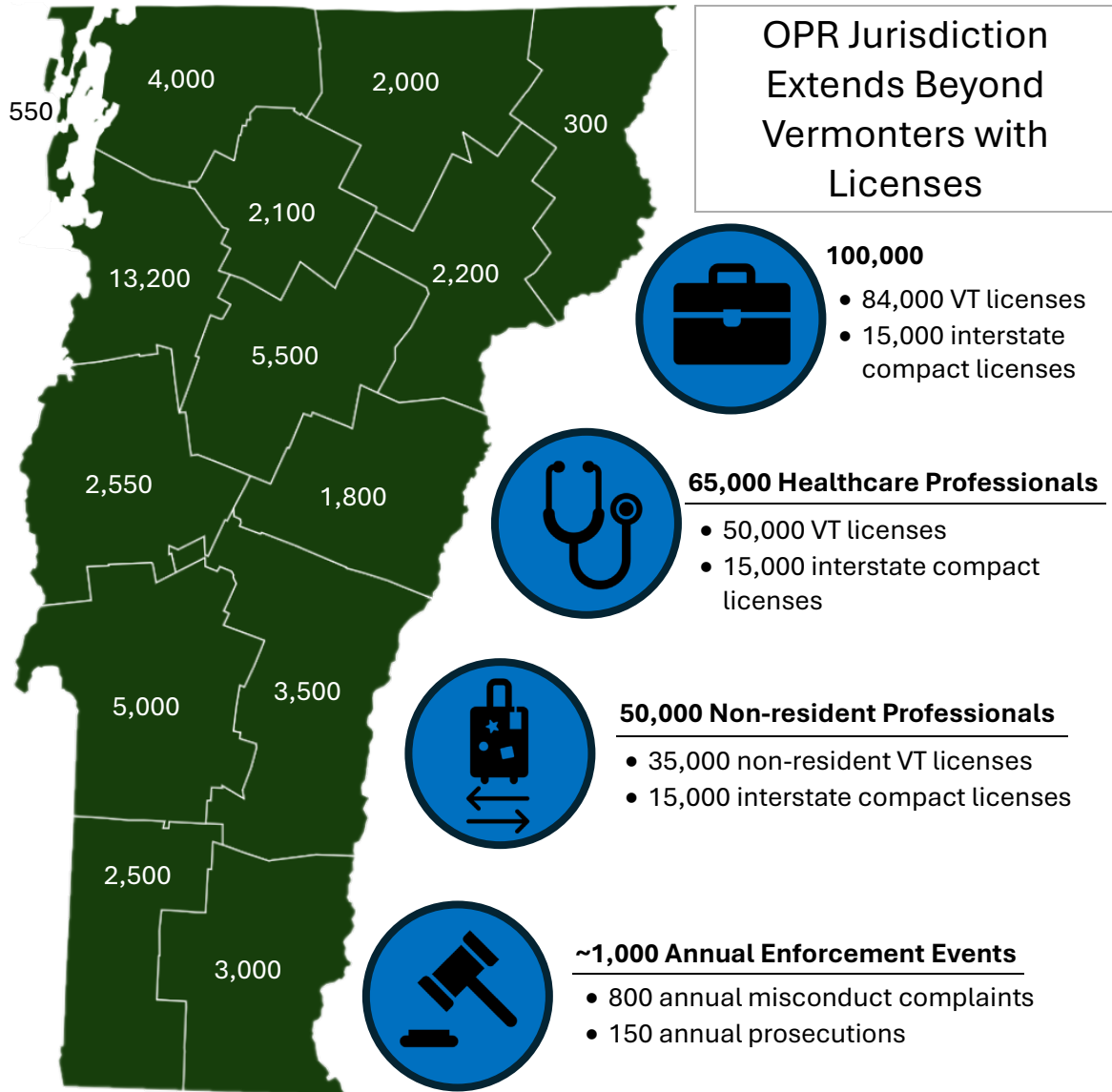
**Figure 1:** OPR’s licensing fee revenue, operational expenses, and net revenue, by fiscal year.

The Office’s operational expenses are outpacing licensing fee revenues. This disparity is caused for multiple reasons, including increased IT spending, fewer active licenses in some programs, and increased staff costs. However, OPR can’t address these causes and resolve its budgetary challenges without first determining the actual resource consumption of each professional regulatory program. In the following, this report finds:

- OPR’s budget model relies too heavily on indirect expense allocation;
- Indirect expense allocation obscures each profession’s actual regulatory costs;
- Staff compensation is OPR’s largest expense and should be a direct allocation; and
- A shifting regulatory landscape with increasing demands is exacerbating the disparity between fee revenue and operational expenses.

1.a | Operational Review: OPR at a Glance

**The Office of Professional Regulation (“OPR”) provides essential public services for Vermonters.** OPR is responsible for regulating the conduct and safe practice of approximately 84,000 Vermont-licensed professionals, as well as another 10,000-20,000 non-resident professionals whose credentials allow the privilege of short-term, interstate practice. **The Office’s regulatory efforts have significant implications on commerce, healthcare, law enforcement, and consumer protection.**



**Figure 2:** A summary of OPR’s annual operations. *Left:* OPR’s approximately 50,000 Vermont-resident professionals, by county. *Right:* A breakdown of all professionals working under OPR’s jurisdiction, including both Vermont licensed professionals and professionals working in Vermont through interstate license compacts.

Regulatory Loads are Increasing

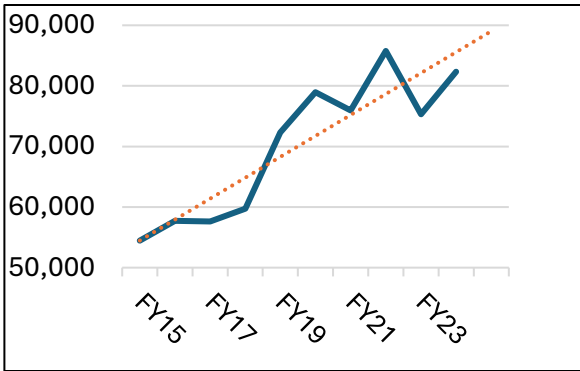


Figure 3: Total active licensure by fiscal year.

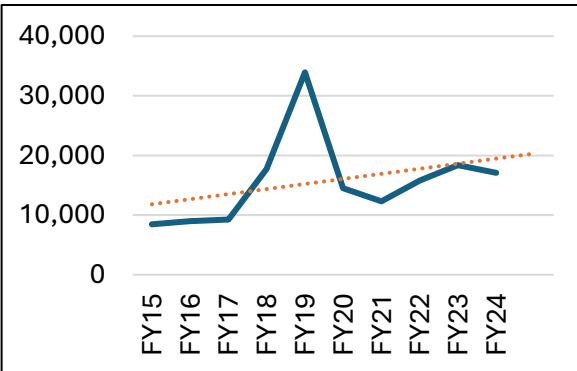


Figure 4: Initial applications by fiscal year.

The number of active credentials licensed by the Office of Professional Regulation has increased nearly 60% in the last ten years. Likewise, the average annual number of new applications for licensure has increased by twofold: OPR now receives an average of over 17,000 applications for licensure each year. This is great news for Vermont, but burdens OPR, whose staff has not grown 60%. In large part, OPR is only able to manage our increased workload due to our IT platform, “NGLP.”

Additionally, due to interstate license compacts, professionals practice in Vermont with short-term “traveling contracts”. OPR is responsible for regulating the conduct of “traveling” professionals even though they are not licensed in Vermont and therefore do not provide OPR with license revenue. Although OPR’s total licensure has recovered from joining the nurse license compact in FY22 (a loss of almost 10,000 licenses), most new credentials are in professions with lower licensing fees. Simply put, OPR now has a greater enforcement responsibility than ever, with fewer licensees to fund its operation.

Regulations are More Complex – Yet Staff Growth is Minimal

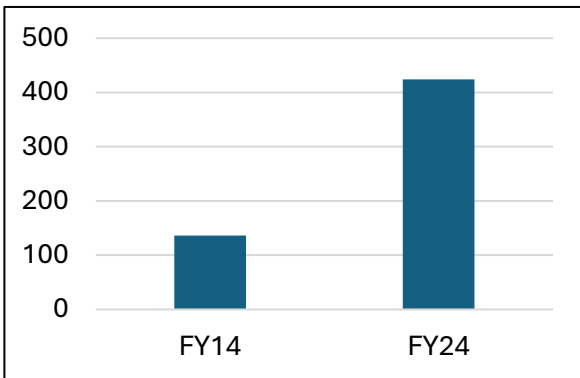


Figure 5: OPR credential types by fiscal year.

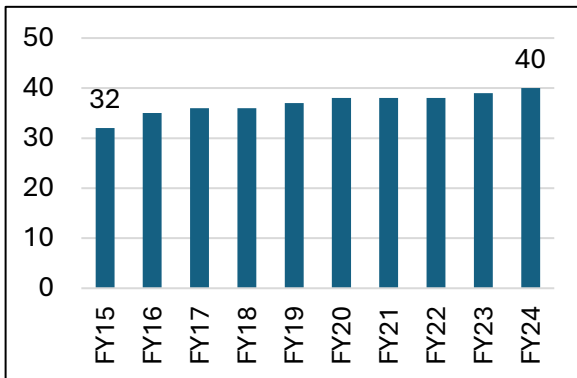


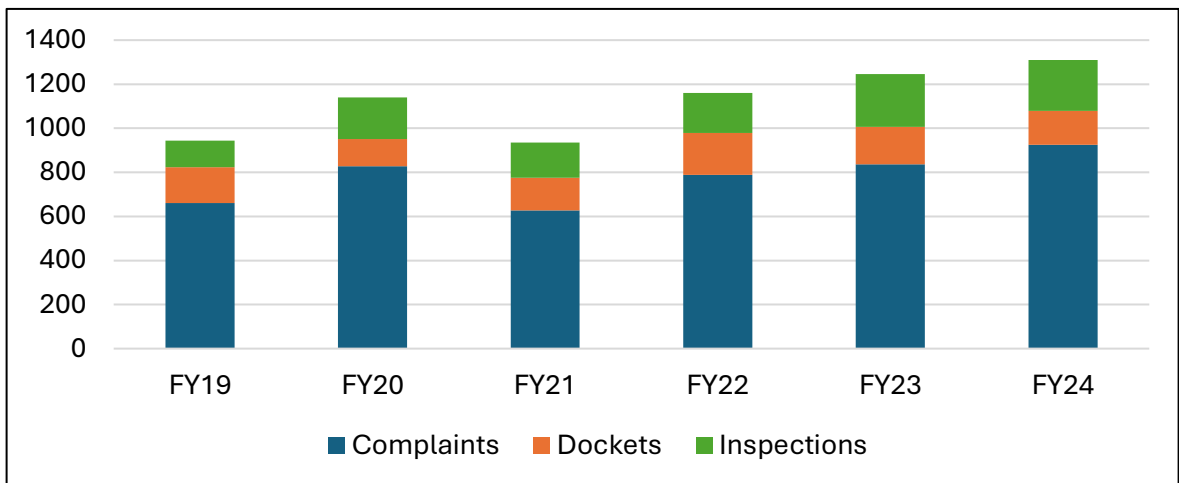
Figure 6: OPR full-time staff by fiscal year.

It is not just the number of licenses that have increased: for the sake of flexibility and access, OPR continues to add licensing pathways into the professions it regulates. As a result, the number of credentials (license types) OPR regulates has increased by over 200% (3x) in the last decade. OPR now regulates more than 50 professions comprised of over 150 profession types, 424 credentials, and 136 credential specialties.<sup>1</sup>

Note: for each credential, there are two to four different application pathways to achieve licensure/renewal. Consequently, OPR may receive over 1,120 different types of applications in a given year. Further, there are multiple new professions with pending sunrise reports that OPR anticipates regulating soon.

Despite a significant increase in total licensure, license complexity, and enforcement work, OPR’s number of full-time employees has remained low. Nevertheless, OPR has met its operational capacity without additional staff.

**Professional Conduct Enforcement & Inspection Workloads are Increasing**



**Figure 7:** OPR complaint cases, docket cases, and inspection cases, by fiscal year.

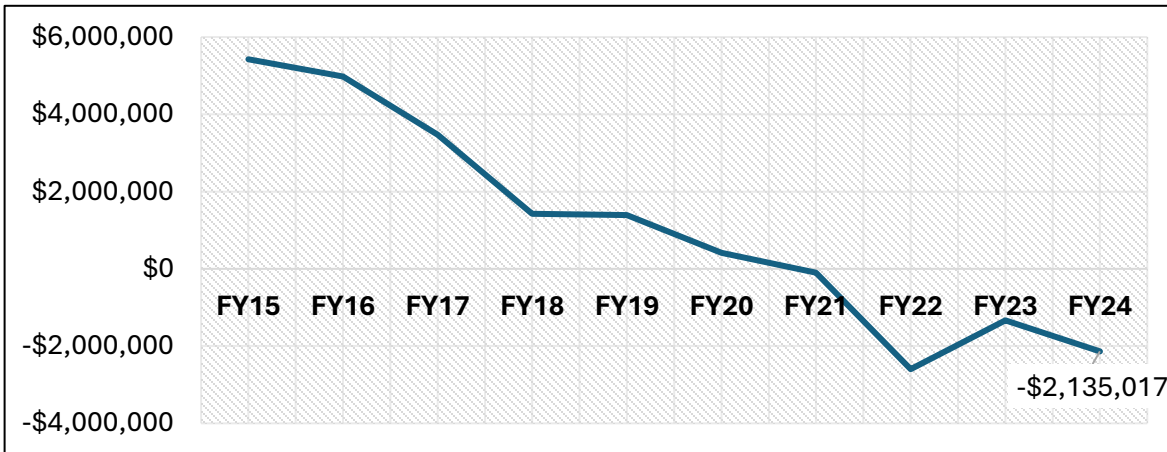
The average annual numbers of complaint cases, the resulting investigations and prosecutions (dockets), and inspections continue to increase year over year:

- nearly 9% growth in annual complaints received;
- 1% growth in annual docket cases filed; and
- nearly 17% growth in the number of inspections needed.

<sup>1</sup> A full list of OPR’s current credential types is available in the appendix.



Professional Regulatory Fund Balance is Negative

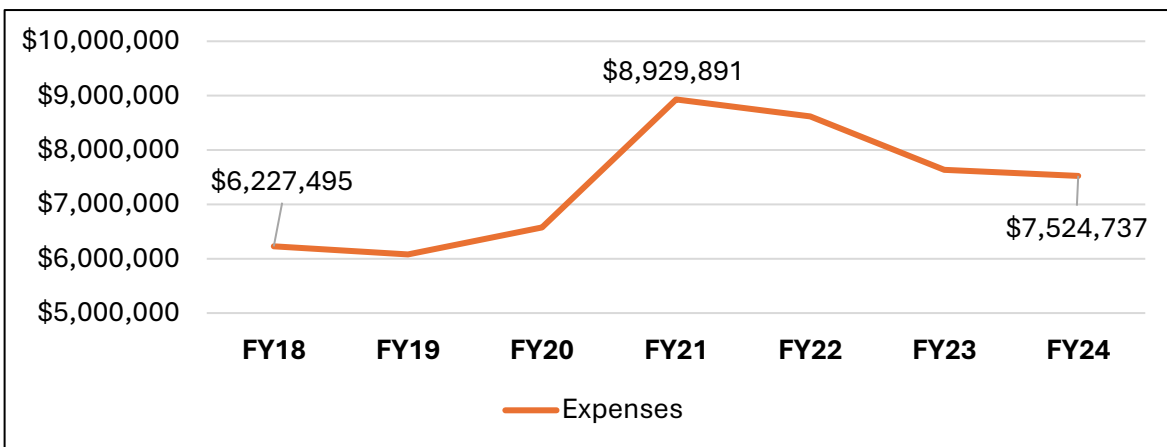


**Figure 8:** OPR fund balance by fiscal year.

In many ways, OPR is a victim of its own success. The Office is efficient and effective. Consequently, the General Assembly increasingly assigns OPR new professions, profession types, and reports. However, licensing fees have not been maintained with either inflation or the growing operational burden. The *Professional Regulatory Fee Fund* is currently functioning in a deficit and is the reason for this study.

1.b | Expenses: Major Cost Drivers & Containment Strategies

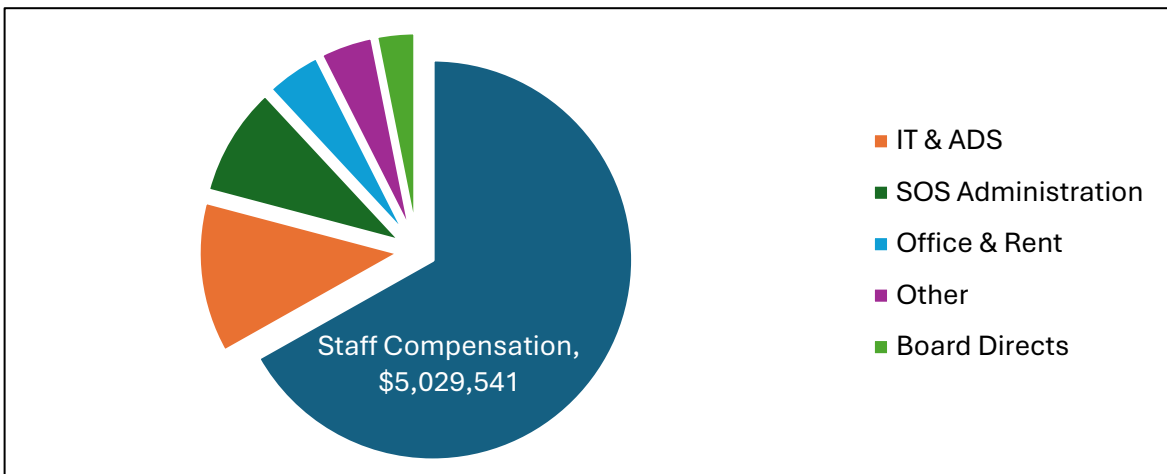
Multiple factors contributed to OPR’s current negative fund balance. Some of OPR’s major cost drivers are routine, the same as those affecting all state agencies: staff compensation, office space, inflation, etc. However, a number of OPR’s major cost drivers are unique: OPR’s *Next Generation Licensing Platform* (NGLP) IT development project, COVID-19 emergency response efforts, and unfunded legislative mandates.



**Figure 9:** OPR total expenses by fiscal year.

Fiscal year 2021 was OPR’s most expensive year of operation in OPR’s history. Since then, OPR has made efforts to cut costs. Expenses in fiscal year 2024 were just 21% higher than in fiscal year 2018. This is less than the change in inflation for that period (25%).<sup>2</sup>

### Staff Compensation



**Figure 10:** OPR expenses by category, fiscal year 2024.

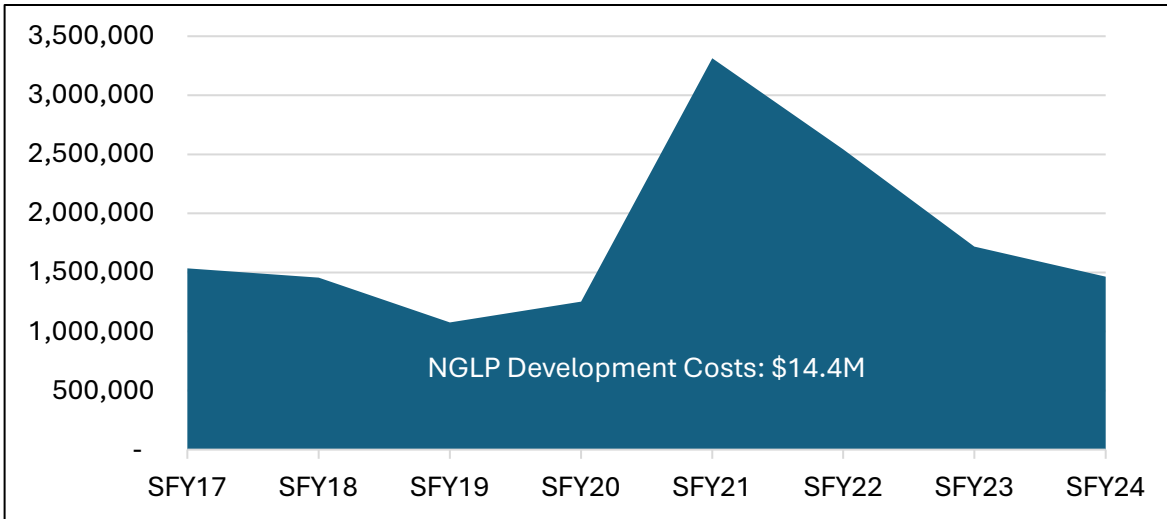
In fiscal year 2024, staff compensation was 67% of OPR’s budget. As a consumer protection agency, OPR requires staff with diverse expertise in license administration (i.e. qualification evaluations), executive officers with specialized expertise in OPR’s highest risk professions, legal, policy, and research staff responsible for designing and implementing over 52 regulatory professional programs, and professional conduct enforcement (a team of 16: 6 certified law enforcement officers, 3 civil investigators, 4 prosecuting attorneys, 2 case managers, and a paralegal).

Cost Control Measures: OPR has made strategic staffing decisions to reduce costs. OPR has eliminated positions through attrition and delayed hiring for new positions until absolutely necessary. In the last decade, OPR has only added 8 full-time positions despite a nearly 60% increase in total licensure, a 200% increase in credential types, and a nearly 100% increase in the number of professionals practicing in OPR’s jurisdiction.

### NGLP: Licensing Software

Beginning in fiscal year 2017, the Office of Professional Regulation started developing a custom software (“NGLP”) for both the license administration and enforcement sides of OPR’s regulatory operations. OPR chose custom software because an “off-the-shelf” solution was not available in the marketplace. Although expensive, NGLP has created efficiencies in OPR’s business operations and enabled OPR to manage significantly increased regulatory responsibilities without dramatic increases in staff.

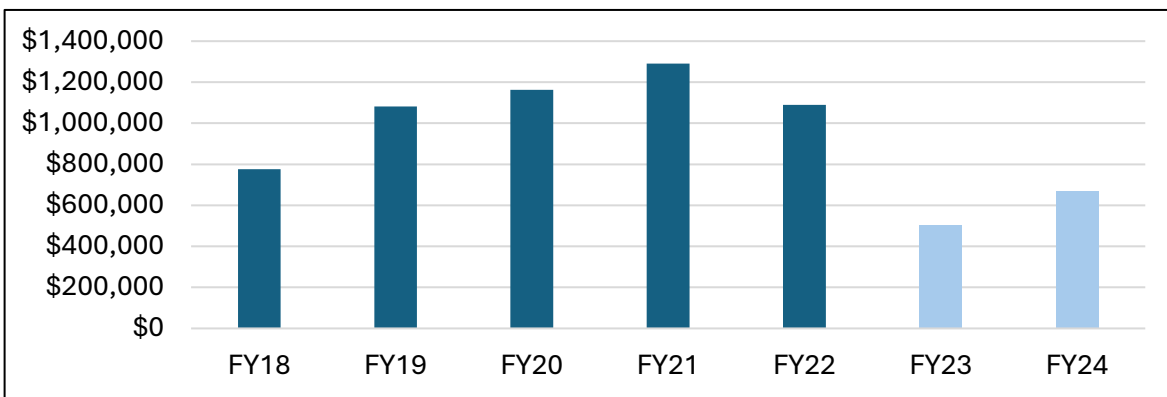
<sup>2</sup> CPI calculation based on BLS data: [https://www.bls.gov/data/inflation\\_calculator.htm](https://www.bls.gov/data/inflation_calculator.htm)



**Figure 11:** OPR’s “NGLP” software development expenses, by fiscal year.

Cost Control Measures: OPR’s current vendor contract expires at the end of 2025. At this time OPR will move from a development and enhancement contract to a significantly less costly maintenance contract. Given that professional regulations are ever-changing, some level of development or enhancement will always be needed. Historically, OPR has absorbed these high costs. However, OPR is now advocating for general funds whenever new policies or programs require expensive software development changes. Similarly, OPR recommends a fee for the data feed service that the Office currently provides for free to hospitals, national professional associations, healthcare organizations, and federal regulatory organizations.

SOS Administrative Costs

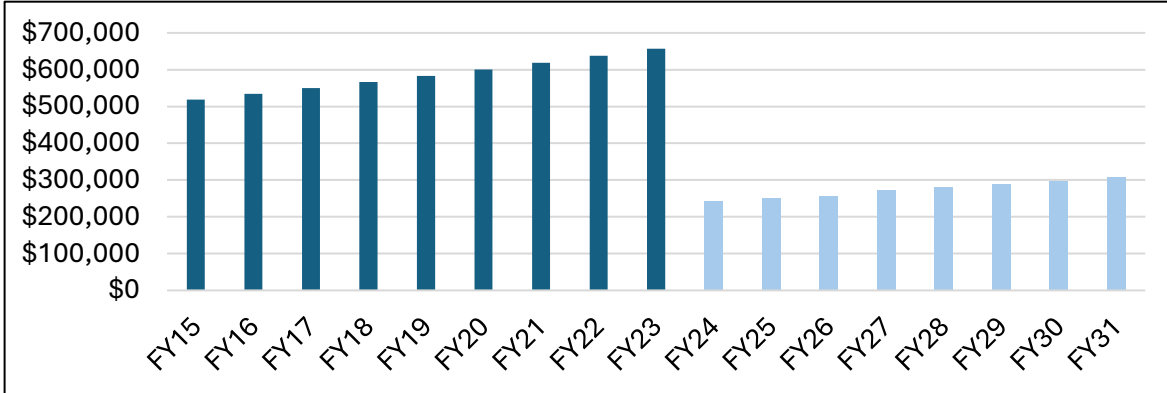


**Figure 12:** OPR cost share of SOS administrative costs, by fiscal year.

OPR is part of the Secretary of State’s Office and the SOS executive team members provide a number of administrative services, including but not limited to: oversight, human resources, IT support, and budget planning. As such, the Office pays a share of the Secretary of State’s operating costs. Until fiscal year FY23, this cost share was determined on a proportional basis according to the number of full-time employees relative to all SOS divisions (OPR, VSARA, Corporations, and Elections).

**Cost Control Measures:** The Secretary of State now requires all executive-level employees to positive report their timesheets, allocating only the time they spend on OPR-related tasks to OPR’s cost share.

Rent: Office Space

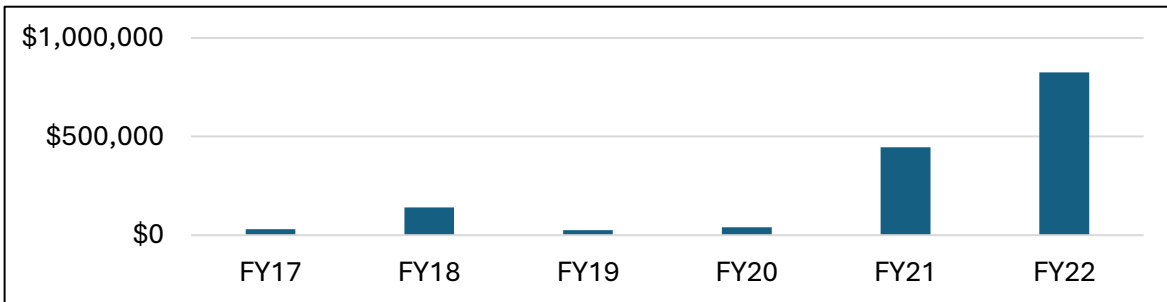


**Figure 13:** OPR office lease cost, by fiscal year.

Since 2012, the Office of Professional Regulation has been located on the 3<sup>rd</sup> floor of 89 Main Street, Montpelier.

**Cost Control Measures:** In Fiscal Year 2024, the Secretary of State renegotiated the lease to a significantly lower cost per square foot. Part of the negotiation included an office renovation which resulted in a smaller footprint with a more functional design. This reduction in office space was possible despite an overall increase in total staff, because OPR has adopted a hybrid work model with fewer staff members in-office at a given time.

Unfunded Legislative Mandates



**Figure 14:** OPR unfunded legislative mandates, by fiscal year.

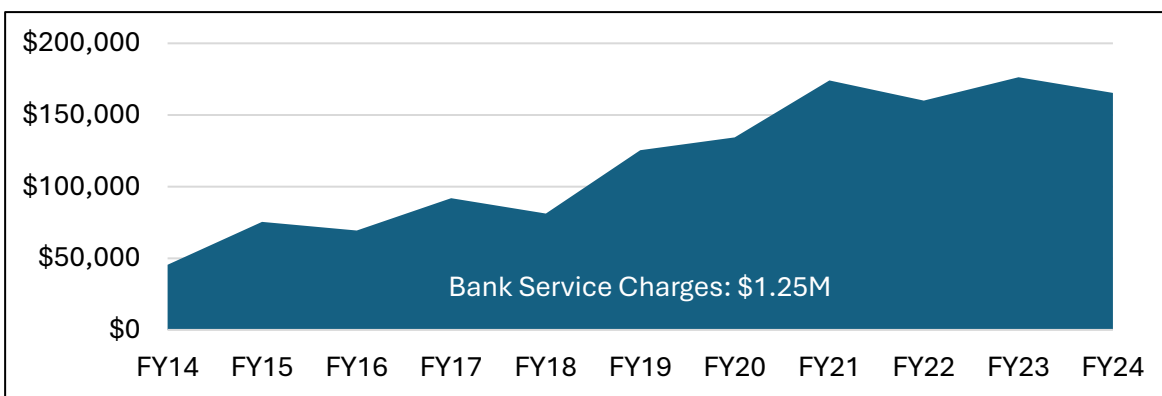
Vermont is a national leader in professional licensing and has implemented policies/projects that achieve the state’s goal of reducing barriers. However, good public policy is not always good for OPR’s budget.

OPR’s COVID-19 response efforts were an important part of Vermont’s pandemic response plan but required high stand-up costs, sacrificed fee revenues, and ultimately pulled resources away from normal regulatory programs. For example, programs such as *fast-track*

*endorsement, facility registration, provisional licensing, telehealth registration, emergency licensing for out-of-staters (EMGY), and second-chance determination* are all policies that benefit workforce access but were expensive to implement. Further, in the case of EMGY credentials, there was no licensing fee. In the above graph, you can see those costs reflected in the increases in FY21 and FY22.

**Cost Control Measures:** OPR has begun requesting general funds for all projects outside OPR’s current regulated professions. If a project is not directly related to a specific profession for which OPR collects licensing fees, OPR will ask for supplemental support from the general fund. Examples include sunrise analyses, legislative reports, and the stand-up costs associated with new regulatory programs or licensing policies.

### Unfunded Services



**Figure 15:** OPR’s bank service charges, by fiscal year.

Currently, OPR performs a number of services that do not have assigned fees. For example, OPR does not require licensees to cover bank service charges when using credit cards or for administration of jurisprudence exams.

**Cost Control Measures:** OPR includes fee assignments in its 2025 legislative agenda for services including but not limited to:

- license specialty applications;
- apprenticeship credential applications;
- administering jurisprudence exams; and
- developing and delivering data feeds.

Similarly, OPR recommends changing the existing policy to start assigning bank service fees.

## Part 2: OPR’s Expense Allocation Models & Issues Therein

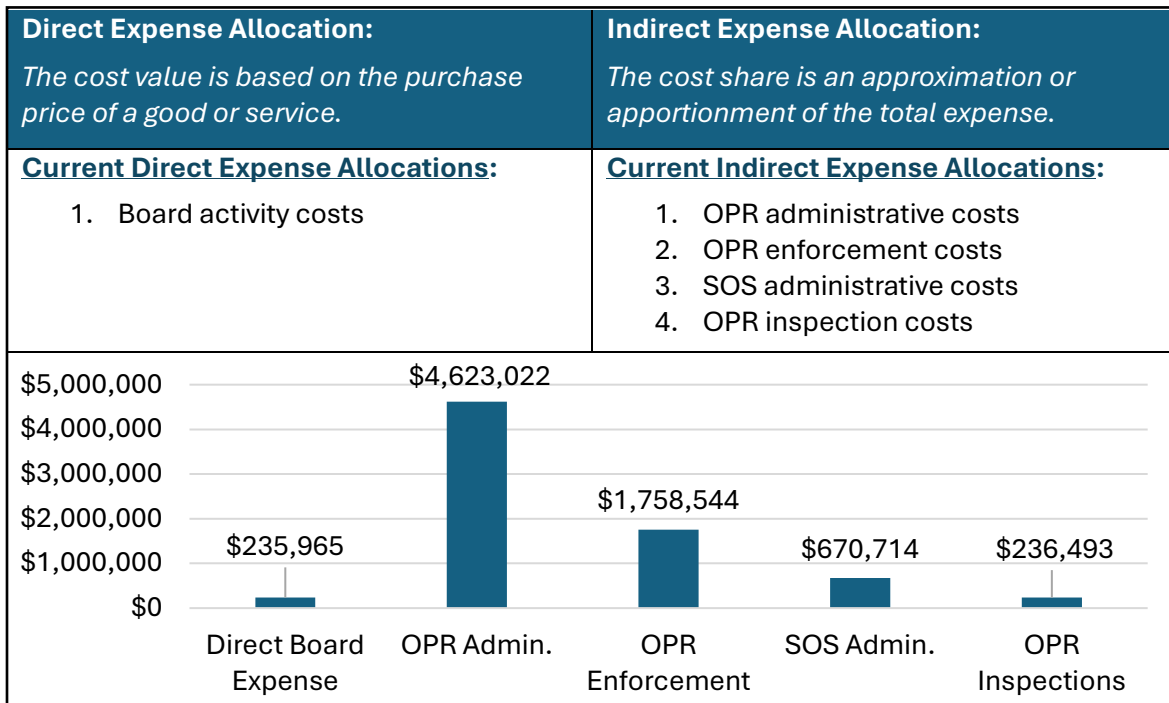
OPR’s 50+ regulated professions are organized by 14 professional boards and 1 advisor group. With exception to the advisor pool, 3 VSA § 124(a) states that:

- (1) the cost of regulating a profession attached to the Office of Professional Regulation should be borne by the profession; and
- (2) one profession should not subsidize the cost of regulating another profession.

Accordingly, OPR maintains 15 “siloes” funds, to which each profession’s regulatory burdens are “billed.” This statutory requirement is underpinned by the general understanding that because regulated professions benefit from restricted market access, licensed professionals should be held financially responsible for the standards and conduct enforcement costs of their respective professional communities.

### Direct vs. Indirect Expense Allocation Models

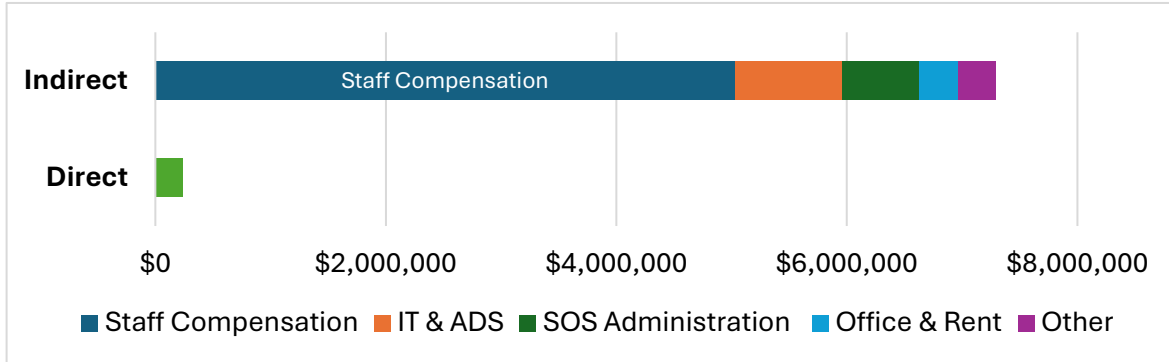
Nevertheless, the majority of OPR’s annual expenses are allocated across board funds indirectly; most expenses are assessed in proportion to the number of licenses in each profession rather than the resources OPR actually spends on regulating the profession. OPR’s only direct expenses pertain to board activities: per diem, travel, adjudicative law officer time, dues, etc. All other agency expenses fall into one of four indirect allocation models: 1) OPR administration, including licensing, policy, and legal, 2) OPR law enforcement, 3) a share of SOS administrative and executive services, and 4) OPR inspections.



**Figure 16:** Fiscal year 2024 direct and indirect expense allocations.

## 2.a | OPR's Direct Board Expenses

At this time, OPR's only direct expenses pertain to board activities: member per diems, board travel expenses, adjudicative law officer (ALO) time in misconduct cases, etc. Direct expenses only comprise approximately 5% of OPR's total expenses.

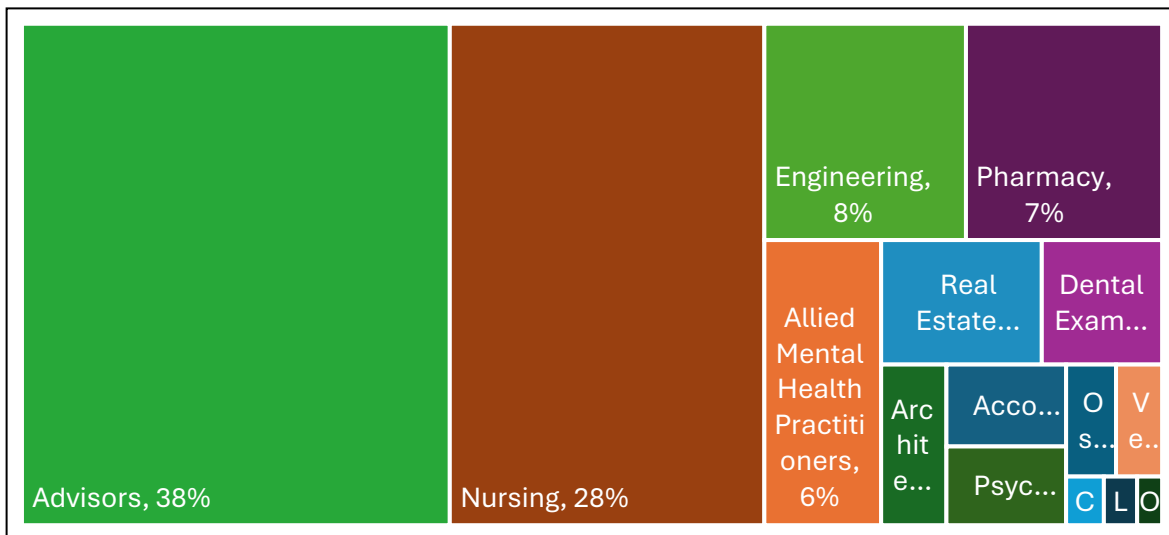


**Figure 17:** OPR expenses by direct and indirect allocation to boards, fiscal year 2024.

### The Problem

As discussed in sections 2.b – 2.e, an overreliance on indirect expense allocation creates the possibility for some licensing boards to subsidize the costs of others. While direct expense allocation is the most equitable approach to expense allocation, it is not always possible: some expenses such as rent, or IT, cannot be directly attributed to specific professions. However, staff compensation comprises approximately 67% of OPR's total expenses, and is one of the easiest costs to directly allocate. OPR staff have begun positive reporting timesheets to determine staff costs by profession (see *Part 4* for more information).

## 2.b | OPR's Administrative Expense Allocation Model



**Figure 18:** OPR board licensure proportions, end of fiscal year 2024.

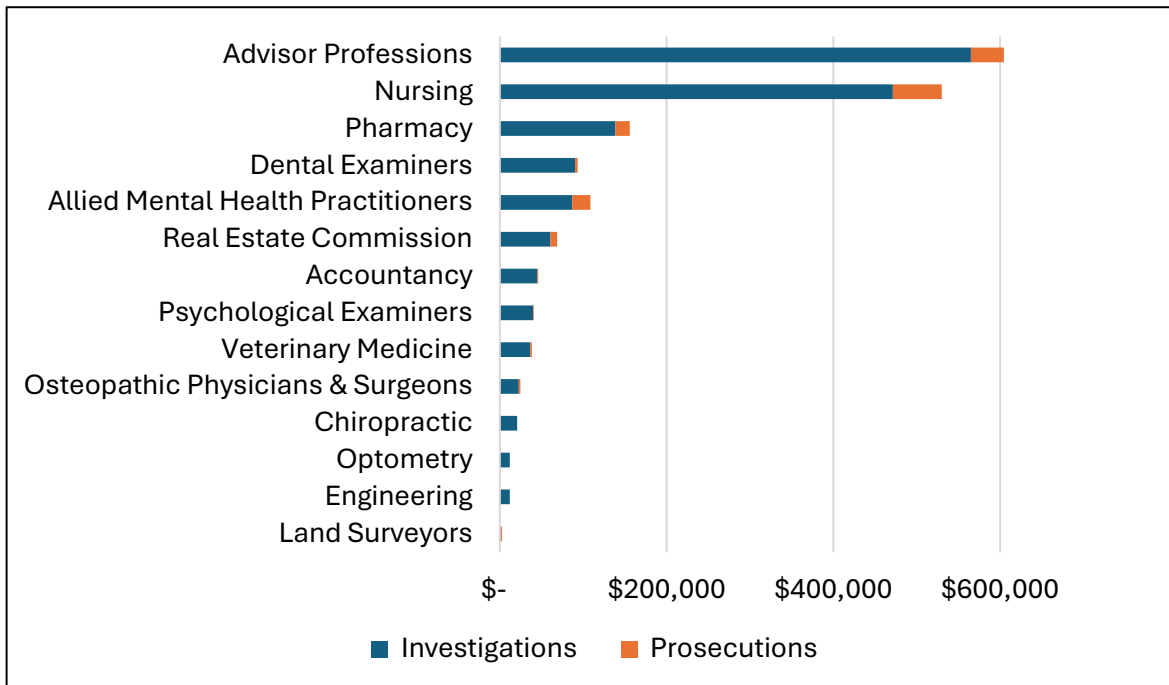
In fiscal year 2024, OPR’s licensing administration expenses totaled \$4.6 million. OPR’s licensing administration expenses include staff costs for all non-enforcement staff, as well as the office’s rent, IT, and other general expenses. OPR’s administrative expenses are allocated across board budgets in proportion to the number of active licensees within each board’s jurisdiction. In Fiscal Year 2024, OPR’s license administration expenses cost boards approximately \$59 per licensee.

The Problem

Although the OPR administrative expense model is fair on a *per capita* basis, it neglects the reality that not all professions’ administrative requirements are equal. Staff time is a finite resource: staff time spent on one profession cannot be spent on another. Ultimately, it is possible that professions with simpler licensing requirements could pay for a greater proportion of OPR staff time than needed, whereas professions with more onerous licensing requirements would not be contributing enough.

As discussed in section 2.a, OPR does not know the actual administrative staff resource costs by profession. This contributes to the disconnect between fees and expenses. However, OPR staff have begun positive reporting timesheets to determine staff costs by profession (see *Part 4* for more information).

**2.c | OPR’s Law Enforcement Expense Allocation Model**



**Figure 19:** OPR’s law enforcement expenses allocated to boards, fiscal year 2024.



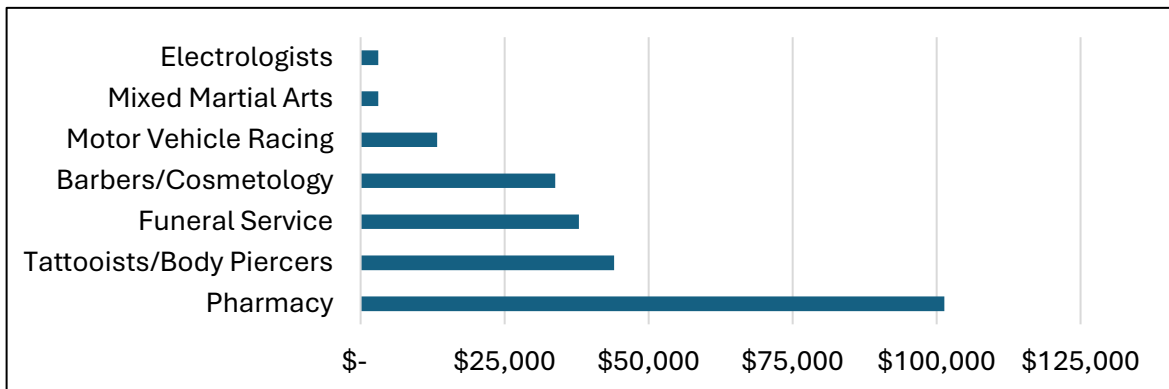
In fiscal year 2024, OPR’s law enforcement expenses totaled nearly \$1.8 million. These include the unit’s staff compensation, fleet vehicles, and other necessary equipment. The enforcement unit’s expenses are allocated indirectly to boards based on the number of new complaints in each profession (OPR investigators’ compensation; 50% of prosecutors’ compensation) and the number of new dockets in each profession (50% of prosecutors’ compensation). In FY24 OPR received 856 complaints and filed 154 dockets, resulting in board expense allocations of approximately \$1,733 per complaint and \$1,009 per docket.

The Problem

OPR’s enforcement expense model is problematic for the same reason as OPR’s licensing administration model: it is fair on a per-event basis, but it neglects the reality that some cases require more resources than others. Some complaints are screened out immediately when they are not within our jurisdiction or don’t allege unprofessional conduct. Other cases may require months of investigation. The latter is especially common in criminal cases, or clinically complicated cases, when the allegations are drug diversion, sexual misconduct, or care that results in a patient’s death. The same is true for simple docket cases compared to complex docket cases with a summary suspension of a license, drawn-out litigation, or expert witnesses. This issue is further exacerbated when enforcement cases span years, because the costs to the board are only assessed in the year of the complaint and docket creation. The result of this indirect expense model is that the most expensive cases at OPR cost professions the same as those that require only a few hours of staff time.

As discussed in section 2.a, until OPR knows the actual enforcement staff costs by profession there will be a disconnect between fees and expenses. Positive reporting on timesheets will help OPR determine true enforcement costs by profession (see *Part 4* for more information).

**2.d | OPR’s Inspection Expense Allocation Model**



**Figure 20:** OPR’s inspection costs, fiscal year 2024.

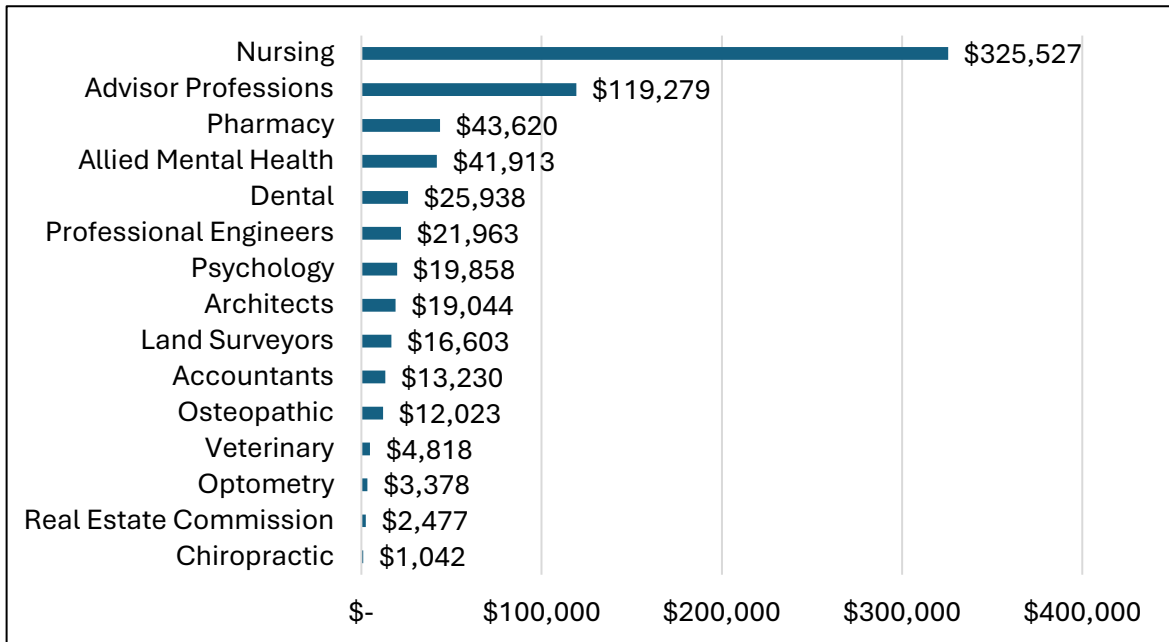
In fiscal year 2024, OPR’s inspection costs totaled approximately \$236,000. These include the unit’s staff compensation as well as fleet vehicles and other necessary equipment. The inspection unit’s expenses are allocated proportionally to boards based on the annual number of inspections, per profession. In FY24 there were 231 inspections, resulting in a board expense of approximately \$1,024 per inspection.

The Problem

OPR’s inspection expense model is problematic for similar reasons as OPR’s enforcement model: it is fair on a *per-event* basis, but it neglects the reality that some inspections require more resources than others. For instance, a compounding pharmacy inspection may involve a multi-step, multi-day process while a cosmetology shop inspection may only require 45 minutes.

As with OPR’s administrative and enforcement expenses, OPR does not know the actual inspection staff resource costs by profession. It will be extremely helpful to have the inspection staff’s positive reporting data, so OPR can more accurately allocate annual inspection costs to each profession and if necessary, modify inspection fees.

**2.e | OPR’s SOS Administrative Expense Allocation Model**



**Figure 21:** SOS administrative expenses allocated to boards, fiscal year 2024.

The Office of Professional Regulation is overseen by the Vermont Secretary of State’s Office (SOS). OPR benefits from SOS executive and administrative services such as oversight, legislative and policy support, IT support, human resources, and budget planning. In fiscal

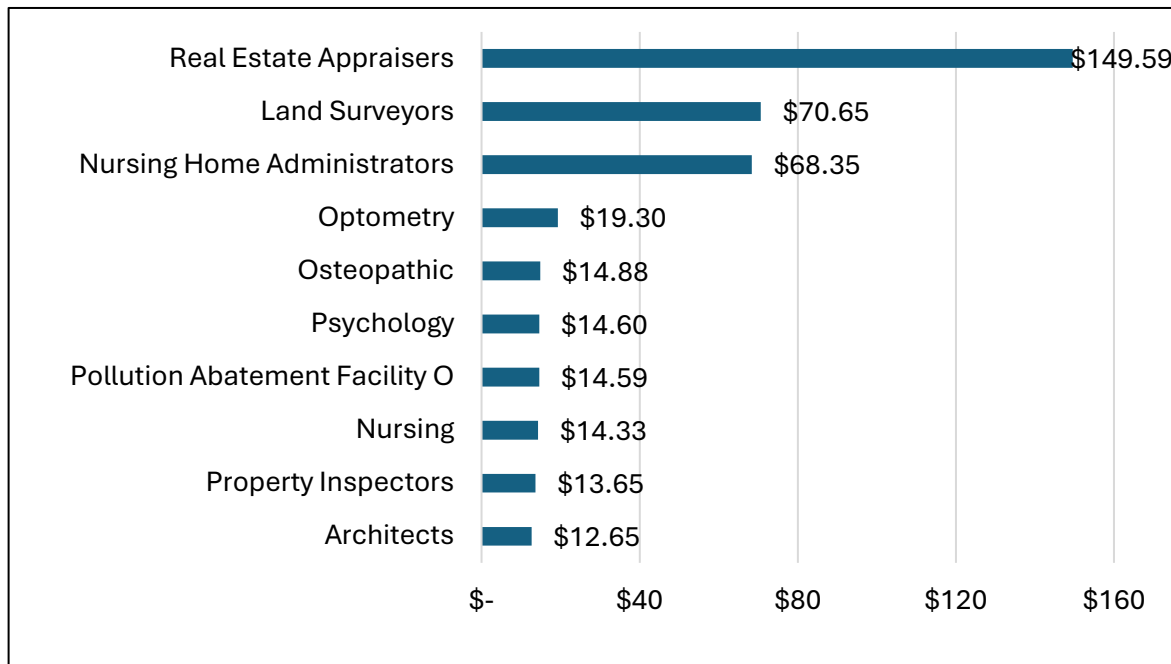
year 2024, OPR contributed \$670,714 to the Secretary of State’s budget for OPR’s portion of SOS services. Historically this value was based on the number of OPR employees in relation to the total number of SOS employees. OPR allocates SOS administrative expenses indirectly to board funds in proportion to each board’s total activities (i.e., direct expenses).

The Problem

There are two issues with the SOS administrative cost allocation.

First, until fiscal year FY23, OPR’s SOS executive and administrative cost share was determined on a proportional basis. As a result, it is possible that OPR was paying for a greater share of SOS resources than the Office actually used. The Secretary of State now requires all members of the executive and administrative team to positive report their timesheets, allocating only the time they spend on OPR-related tasks to OPR’s cost share.

Second, the SOS administrative expenses, while essential to OPR’s efficient operation as an umbrella agency, are not directly tied to specific professions. As a result, it is possible the current model inequitably distributes the SOS administrative cost burden across the different professions’ funds. For example, it makes little sense that in FY24 the real estate appraiser, land surveyor, and nursing home administrator professions contributed so much more per licensee towards SOS administrative costs than other professions. At the same time, some professions paid nothing at all towards the SOS administrative cost share.



**Figure 22:** The 10 highest SOS administrative expense allocations per licensee, by profession, fiscal year 2024.

## Part 3: Information Deficits & Equity Considerations

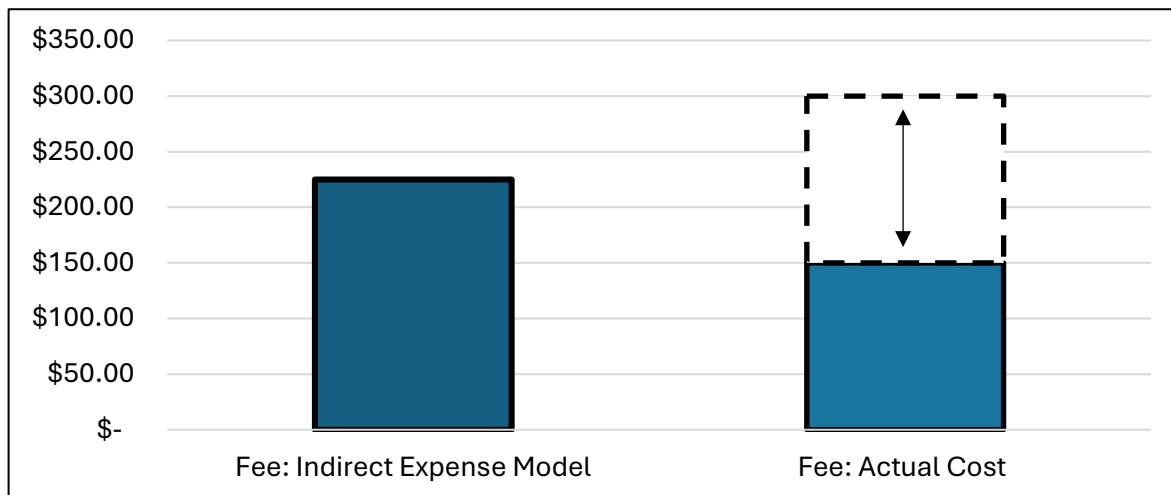
Ultimately, all fiscal decisions are policy decisions due to their impact. Likewise, many policy decisions have a significant fiscal impact. OPR’s perennial pursuit of transparency and equity frequently impacts both policy and fiscal policy.

### 3.a | Indirect Expense Allocation vs. Actual Cost

Indirect expense allocation is sometimes necessary and appropriate. However, OPR’s overreliance on indirect models has resulted in a lack of operational transparency and risks inequitable cost burdens across regulated professions. While it is true that OPR’s indirect expense allocation models satisfy the intent of 3 VSA § 124, indirect cost allocation inherently limits OPR’s understanding of each profession’s true regulatory costs.

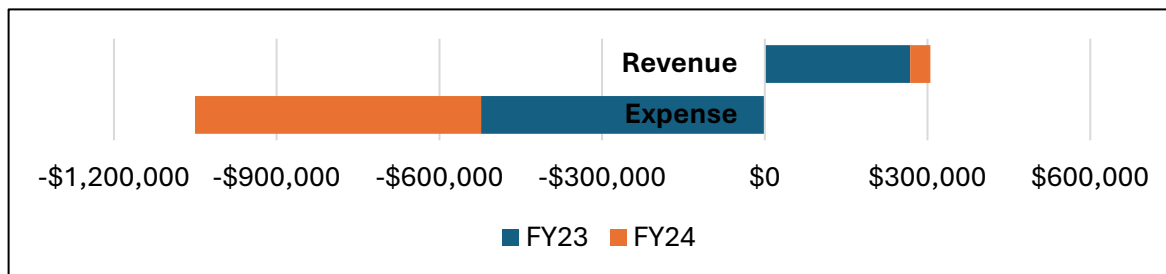
Consequently, OPR and the Legislature cannot determine if a profession’s licensing fees generate sufficient revenue to cover its regulatory costs. Likewise, it is not currently possible to determine if a profession’s regulatory costs are indirectly subsidized by another profession. For these reasons, it is difficult to determine which of the current licensing fees should be raised or reduced.

All of OPR’s programs carry a minimum indirect cost basis for OPR’s operational expenses which cannot be directly allocated by profession (e.g. rent, utilities, IT). However, staff time is OPR’s single largest expense (67% of total expenses) and should be directly allocated by the professional program to ensure an equitable fee determination. OPR staff have begun positive reporting timesheets to determine staff costs by profession. Positive reporting timesheets will allow OPR to direct expense staff resources by profession, thereby informing OPR which professions’ licensing fees truly cover their regulatory costs.



**Figure 23:** Example of the potential disparity between a profession’s current fees and actual regulatory costs when staff resource use is considered.

A great example of the potential disparity between license fee and regulatory costs is the regulation of Notaries Public. Under the current expense allocation models, the Notaries Public program costs the Advisor Fund approximately \$1.1M each fiscal biennium. Of those costs, only \$6,700 are direct costs. Unfortunately, Notary Public licensing fees generate only approximately \$300,000 in revenue each biennium. Anecdotally speaking, OPR knows that the regulation of Notaries Public is not as resource-intensive as the indirect expense model suggests. However, because the Notaries Public profession comprises 11% of OPR’s total licensure, it pays 11% of OPR’s administrative expenses. As a result, it is possible that the Notaries Public profession, through the Advisor Fund, is subsidizing other regulated professions.



**Figure 24:** Notaries Public revenue and allocated expenses, by fiscal year.

### 3.b | Interstate Licensure Compacts & Equity Considerations

In recent years, there has been a rapid growth of interstate license compacts, particularly within regulated healthcare professions. Interstate compacts allow licensed professionals who are residents of compact member states to practice in other compact member states without requiring additional state licenses. Compacts are good licensing policy: compacts reduce barriers to practice across state lines, increase workforce mobility, and improve access to care. Because Vermont, like all small states, is a “net user” of traveling professionals, interstate licensure compacts can be particularly beneficial.

Accordingly, OPR is currently a member of 6 interstate licensure compacts: the Interstate Medical Licensure Compact (IMLC), the Nurse Licensure Compact (NLC), the Interstate Counseling Compact (ICC), the Physical Therapy Licensure Compact (PTLC), the Audiology and Speech-Language Pathology Interstate Compact (ASLPIC), and the Psychology Interjurisdictional Compact (PIC). OPR enacted 2 more compacts in the 2024 legislative session: the Occupational Therapy Licensing Compact (OTLC) and the Social Work Licensing Compact (SWLC). Additionally, more compacts are on the horizon each year, including a dietitian compact and a dental examiner compact.

However, compacts are costly for OPR and Vermont’s resident licensees of the compact profession. When Vermont joins a compact, OPR loses licensing revenue while the profession’s enforcement expenses remain consistent or increase due to a growing number of travelers for which OPR still has enforcement responsibility. OPR estimates that compact

memberships will result in a biennial loss of approximately \$1.9 million in licensing revenue for the FY24-25 cycle. In other words, if Vermont did not join these compacts, and each of those professionals still required a Vermont license, OPR would receive an additional \$1.9 million dollars in licensing revenue. This is not a small consideration when OPR is projected to run over a \$2M deficit.

Compact	Renewal Losses	Revenue Lost
IMLC	229	\$0
NLC	8,913	\$1,689,295
ICC	254	\$72,000
PTLC	212	\$38,000
ASLPIC	70	\$19,250
PIC	106	\$21,000
OTLC	190	\$34,000
SWLC	224	\$40,000
	<b>Total</b>	<b>\$1,913,545</b>

**OPR’s Budget Model Was Not Designed for Compacts**

Notably, compact membership in one profession increases the financial burden for OPR’s other professions. Because OPR administrative expenses are allocated proportional to a profession’s licensee population, when one profession joins a compact, its number of licensees reduces, and every other profession’s share of administrative expenses increases.

For example, when Vermont joined the Nurse Licensure Compact, OPR lost 8,913 nurse licenses. This represents about 10% of OPR’s FY23 licensure across all OPR’s professions. As a result, about \$435,000 of OPR administrative expenses were shifted from the Nursing Board’s budget and redistributed to every other profession that OPR regulates.

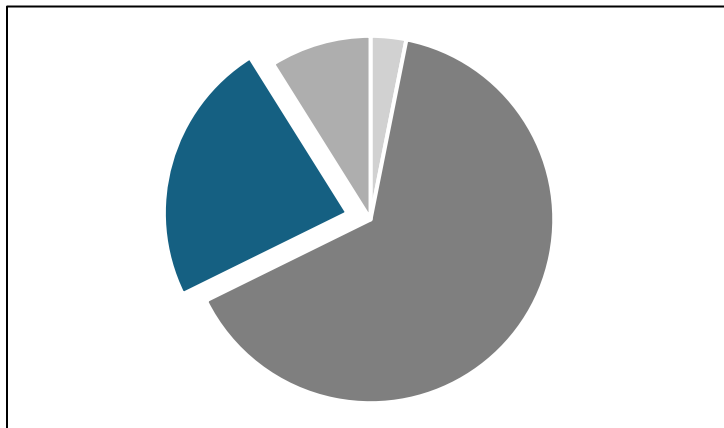
Likewise, due to OPR’s “siloeed funds” model, interstate compacts force Vermont’s resident professionals to subsidize the regulation of their nonresident peers. When Vermont joins a compact, the profession’s enforcement costs remain the same or increase, while a smaller licensure base, consisting primarily of Vermont resident professionals, must carry the burden. A higher cost on fewer licensees pressures OPR to request fee increases. However, in recent years the legislature’s understandable concerns over affordability for Vermont’s healthcare professionals have limited many of the necessary fee increases.

Given the shifting national landscape in professional regulation, it is beyond time for OPR to study if there are more effective ways to fund the Office’s important work. Interstate license compacts are good public policy benefiting Vermont in a number of ways, but are antithetical to OPR’s siloeed fund model. Nearly half of OPR’s regulated workforce are non-resident professionals. As compacts continue to proliferate, OPR anticipates losing more of its licensure base. It is not fair to shift this cost burden onto Vermont’s resident professionals.

It is likely that the positive reporting study will find that the licensing fees in the healthcare professions with interstate license compacts are insufficient to cover the costs of regulation. Supported by this data, OPR will then be able to make recommendations for changes to fee rates and/or the Office’s funding structure.

### 3.c | Professional Conduct & Law Enforcement Funding

In FY24, the enforcement division cost OPR approximately \$1.75M, or 23% of OPR’s total expenses. This cost is carried by OPR’s licensees, but not by all Vermonters. This is distinct from how other public protection agencies in Vermont are funded.



**Figure 25:** FY24 expenses, enforcement unit (blue).

Vermonters benefit when professionals who are impaired, incompetent, or unethical are removed or otherwise restricted from practicing in Vermont. Vermonters rely on state oversight of the professions to protect against those potential harms that are not identifiable when seeking care or services. OPR’s “in-house” enforcement division is essential to provide this protection.

#### OPR’s In-house Enforcement Division Must Be Fast and Specialized

OPR’s enforcement work requires staff with profession-specific knowledge. OPR’s enforcement division includes 16 full-time staff members: nine investigators (six LEOs; three civil investigators), four prosecuting attorneys, two case managers, and a paralegal.

OPR’s investigations and resulting prosecutions are increasingly complicated. OPR investigates both criminal and non-criminal cases. OPR refers criminal cases to local state’s attorneys or the Attorney General for criminal prosecution. If warranted, after investigation, OPR also initiates administrative prosecution against the Vermont license.

For example, if there is a nurse who is diverting narcotics from a hospital floor, OPR will investigate that complaint and refer the criminal case to the local state’s attorney. Simultaneously, OPR prosecutors will seek a summary suspension to remove that nurse from practice while they receive drug treatment and testing. OPR will then also file administrative charges against the nurse. The nurse has full due process, and for all intents and purposes, OPR operates a courthouse through the administrative hearing system – including discovery, depositions, and motion practice. The example case could ultimately be resolved via a stipulation or a finding by the board or administrative law judge. At that point, the case may be dismissed, or the nurse may be found to have committed unprofessional conduct. In the event of an unprofessional misconduct finding, the nurse’s license would most likely receive conditions so if the nurse shows they are rehabilitated, OPR could modify the conditions on the license to allow for supervised practice. OPR prefers enforcement actions to be rehabilitative, rather than purely punitive, when possible.

OPR's law enforcement and prosecution work, as the above example shows, is essential to protect all Vermonters. This work requires significant profession-specific knowledge, careful evidence collection, delicate interviews, and a thorough review of profession-specific healthcare and financial documents. This work is labor intensive and can result in long investigations. Through no fault of their own, local law enforcement agencies do not have the "bandwidth" or training to investigate criminal professional misconduct cases. Law enforcement agencies struggle to recruit and retain staff, resulting in short staffing and stretched resources. OPR has experienced significant challenges with contacting local law enforcement agencies and getting "buy-in" to conduct joint investigations or to conduct an independent investigation that works with a timeline necessary to ensure public protection.

It is imperative that OPR seeks a summary suspension to quickly remove a professional from practice, if after an investigation, that individual is alleged to have committed drug diversion or sexual misconduct. When OPR is alerted to one of these serious cases, it can act quickly to protect Vermonters. Having in-house criminal investigators allows OPR to investigate the civil licensure and criminal aspects of a complaint, concurrently. Likewise, in-house investigators benefit witnesses by reducing the need for multiple interviews by different agencies. Perhaps most importantly, OPR's use of in-house criminal investigators leads to more consistent enforcement for Vermont's professionals regardless of their county or local agencies' investigative abilities.

OPR's skilled criminal and civil investigators bring years of interview and investigation experience to the unit, as well as their connections within the local law enforcement communities and States Attorney Offices. These relationships are critical for collaboration in significant investigations where outside resources are needed. Certified law enforcement officers also have access to law enforcement information and databases (Valcour, NCIC, VJISS, DMV, etc.) that are essential to the investigation process in OPR's enforcement cases.

Similarly, OPR's prosecutors develop profession-specific expertise. OPR's prosecutors benefit from working relationships with the office's appointed board members or advisors who help determine if a case should be pursued. Having OPR attorneys in-house, who are not burdened with unrelated responsibilities, is essential to protect Vermonters.

### Cost Basis: Maintaining OPR's Enforcement Division

Currently, OPR's licensing boards only contribute to OPR's enforcement division in fiscal years when there are complaints cases against the board's licensees. However, the enforcement unit must be maintained regardless of variable program needs. A profession could go years without a single case, not contributing to the maintenance costs of the enforcement division, only to then have a serious, significant case that demands the enforcement division to investigate and prosecute. In other public protection agencies, such as the State Police or emergency services, all of Vermont's taxpayers maintain these services.



All Vermonters benefit from OPR's law enforcement work, although the public protection work, as well as the complexity of that protection, is unknown to many. After the positive reporting study, OPR anticipates providing recommendations related to its funding model. It is possible that OPR will recommend all professions provide at least a minimum annual contribution towards maintaining OPR's enforcement division, even in years when those professions have not generated any enforcement cases. Simply put: all professions benefit from having a standing, skilled enforcement division at the ready to investigate and prosecute misconduct cases.

Note: OPR does not yet have a recommendation to address the increasing enforcement burden from interstate license compacts, which reduce the number of fee-paying licensees while increasing the number of regulated professionals within OPR's regulatory jurisdiction.

## Part 4: Next Steps & Interim Recommendations

The Office of Professional Regulation has determined that the current funding model is unsustainable and risks inequitable cost burdens across professional regulatory programs.

**OPR recommends a two-year study period to collect positive reporting data. The Office has already moved to positive reporting.** In this report, the Office identifies an overreliance on indirect expense allocation models: approximately 95% of total expenses. While not all operational costs can be dispensed through direct allocation, OPR must increase its total proportion of direct expense allocation—both for transparency and equity in fee-setting. Staff compensation currently makes up approximately 67% of OPR’s total expenses, and is the easiest and most appropriate operational cost to allocate directly by professional program.

**OPR recommends establishing fees for many services that the Office currently performs for free.** The Office of Professional Regulation currently performs a number of services for applicants and licensees for which there are no assigned fees. These services consume staff resources and should be charged as with any other of OPR’s services. These services include:

- Processing license specialty applications;
- Processing apprenticeship credential applications;
- Administering jurisprudence exams;
- Processing credit cards; and
- Developing and delivering data feeds.

Fees for many of these services are contained in OPR’s recommended 2025 legislative agenda.

**OPR recommends studying the funding models of sister agencies in other states.** Nearly every state has at least one professional regulatory agency, for which the funding structures vary greatly. OPR has already begun outreach and discussions with numerous agencies regarding their funding, to determine if a different model would better fit Vermont’s needs. This includes how other agencies ensure fees are maintained with changes in inflation, if they silo funds by profession, or if they receive any public funds – particularly for enforcement.

**OPR recommends studying the potential for additional funding possibilities in Vermont.** During this data collection period, OPR will explore funding opportunities that already exist within the state and may pertain to the Office’s existing operations.

**OPR recommends studying the potential for de-siloing the Professional Regulatory Fee Fund.** The data collected from positive reporting throughout this 2-year study period will inform OPR of the disparity between each board’s current fees and actual regulatory costs. OPR will use this data to determine if fee changes are necessary, and/or if de-siloing of the Professional Regulatory Fee Fund is required to maintain fees within reasonable bounds.

*Respectfully submitted to the House Committee on Government Operations and Military Affairs, and the Senate Committee on Government Operations.*

**STATE OF VERMONT  
SECRETARY OF STATE  
OFFICE OF PROFESSIONAL REGULATION**

**BY:**



January 30, 2025

Dylan Bruce  
*Policy and Research Manager*

Date

**APPROVED:**



January 30, 2025

Michael Warren  
*Director*

Date

## Appendix: OPR Credential Types

	Fund Name	Professions	Credential Type
1	Advisor Fund	Acupuncture	091 - Licensed Acupuncturist
2	Advisor Fund	Acupuncture	091 - Licensed Acupuncturist - INTERIM Telehealth Registration (TELE)
3	Advisor Fund	Acupuncture	091 - Licensed Acupuncturist - PROV
4	Advisor Fund	Alcohol & Drug Abuse Counselors	149 - Apprentice Addiction Professional
5	Advisor Fund	Alcohol & Drug Abuse Counselors	149 - Apprentice Addiction Professional - INTERIM Telehealth Registration (TELE)
6	Advisor Fund	Alcohol & Drug Abuse Counselors	150 - Certified Alcohol and Drug Counselor
7	Advisor Fund	Alcohol & Drug Abuse Counselors	150 - Certified Alcohol and Drug Counselor - INTERIM Telehealth Registration (TELE)
8	Advisor Fund	Alcohol & Drug Abuse Counselors	150 - Certified Alcohol and Drug Counselor - PROV
9	Advisor Fund	Alcohol & Drug Abuse Counselors	151 - Licensed Alcohol and Drug Abuse Counselors
10	Advisor Fund	Alcohol & Drug Abuse Counselors	151 - Licensed Alcohol and Drug Abuse Counselors - INTERIM Telehealth Registration (TELE)
11	Advisor Fund	Alcohol & Drug Abuse Counselors	151 - Licensed Alcohol and Drug Abuse Counselors - PROV
12	Advisor Fund	Alcohol & Drug Abuse Counselors	151 - Licensed Alcohol and Drug Abuse Counselors Telehealth License - TELL
13	Advisor Fund	Alcohol & Drug Abuse Counselors	151 - Licensed Alcohol and Drug Abuse Counselors Telehealth Provisional License - TELP
14	Advisor Fund	Alcohol & Drug Abuse Counselors	151 - Licensed Alcohol and Drug Abuse Counselors Telehealth Provisional Registration - TERP
15	Advisor Fund	Alcohol & Drug Abuse Counselors	151 - Licensed Alcohol and Drug Abuse Counselors Telehealth Registration - TELR
16	Advisor Fund	Athletic Training	104 - Athletic Trainer
17	Advisor Fund	Athletic Training	104 - Athletic Trainer - INTERIM Telehealth Registration (TELE)
18	Advisor Fund	Athletic Training	104 - Athletic Trainer - PROV
19	Advisor Fund	Athletic Training	104 - Athletic Trainer Telehealth License - TELL
20	Advisor Fund	Athletic Training	104 - Athletic Trainer Telehealth Provisional License - TELP
21	Advisor Fund	Athletic Training	104 - Athletic Trainer Telehealth Provisional Registration - TERP
22	Advisor Fund	Athletic Training	104 - Athletic Trainer Telehealth Registration - TELR
23	Advisor Fund	Auctioneering	057 - Auctioneer

Funding Structure Study | Professional Regulatory Fee Fund

24	Advisor Fund	Auctioneering	057-APPN - Auctioneer - Apprentice
25	Advisor Fund	Audiologists	145 - Audiologist
26	Advisor Fund	Audiologists	145 - Audiologist - INTERIM Telehealth Registration (TELE)
27	Advisor Fund	Audiologists	145 - Audiologist - PROV
28	Advisor Fund	Audiologists	145 - Audiologist Telehealth License - TELL
29	Advisor Fund	Audiologists	145 - Audiologist Telehealth Provisional License - TELP
30	Advisor Fund	Audiologists	145 - Audiologist Telehealth Provisional Registration - TERP
31	Advisor Fund	Audiologists	145 - Audiologist Telehealth Registration - TELR
32	Advisor Fund	Behavior Analyst	146- Applied Behavior Analyst
33	Advisor Fund	Behavior Analyst	146- Applied Behavior Analyst - INTERIM Telehealth Registration (TELE)
34	Advisor Fund	Behavior Analyst	146- Applied Behavior Analyst - PROV
35	Advisor Fund	Behavior Analyst	146- Applied Behavior Analyst Telehealth License - TELL
36	Advisor Fund	Behavior Analyst	146- Applied Behavior Analyst Telehealth Provisional License - TELP
37	Advisor Fund	Behavior Analyst	146- Applied Behavior Analyst Telehealth Provisional Registration - TERP
38	Advisor Fund	Behavior Analyst	146- Applied Behavior Analyst Telehealth Registration - TELR
39	Advisor Fund	Behavior Analyst	147- Assistant Behavior Analyst
40	Advisor Fund	Behavior Analyst	147- Assistant Behavior Analyst - INTERIM Telehealth Registration (TELE)
41	Advisor Fund	Behavior Analyst	147- Assistant Behavior Analyst - PROV
42	Advisor Fund	Behavior Analyst	147- Assistant Behavior Analyst Telehealth License - TELL
43	Advisor Fund	Behavior Analyst	147- Assistant Behavior Analyst Telehealth Provisional License - TELP
44	Advisor Fund	Behavior Analyst	147- Assistant Behavior Analyst Telehealth Provisional Registration - TERP
45	Advisor Fund	Behavior Analyst	147- Assistant Behavior Analyst Telehealth Registration - TELR
46	Advisor Fund	Boxing	055 - Professional Promoter
47	Advisor Fund	Boxing	056 - Professional Boxer
48	Advisor Fund	Boxing	170- Professional Boxing Participant (Judge, Second, Manager, Referee) Charge fee each specialty
49	Advisor Fund	Clinical Social Work	089 - Licensed Independent Clinical Social Worker
50	Advisor Fund	Clinical Social Work	089 - Licensed Independent Clinical Social Worker - INTERIM Telehealth Registration (Tele)

Funding Structure Study | Professional Regulatory Fee Fund

51	Advisor Fund	Clinical Social Work	089 - Licensed Independent Clinical Social Worker - PROV
52	Advisor Fund	Clinical Social Work	089 - Licensed Independent Clinical Social Worker Telehealth License - TELL
53	Advisor Fund	Clinical Social Work	089 - Licensed Independent Clinical Social Worker Telehealth Provisional License - TELP
54	Advisor Fund	Clinical Social Work	089 - Licensed Independent Clinical Social Worker Telehealth Provisional Registration - TERP
55	Advisor Fund	Clinical Social Work	089 - Licensed Independent Clinical Social Worker Telehealth Registration - TELR
56	Advisor Fund	Cosmetology	005 - Barber
57	Advisor Fund	Cosmetology	005 - Barber (Apprentice)
58	Advisor Fund	Cosmetology	009 - Cosmetologist
59	Advisor Fund	Cosmetology	010 - Cosmetologist
60	Advisor Fund	Cosmetology	011 - School of Cosmetology
61	Advisor Fund	Cosmetology	012 - Cosmetology Shop
62	Advisor Fund	Cosmetology	058 - Barber Shop
63	Advisor Fund	Cosmetology	086 - Nail Technician
64	Advisor Fund	Cosmetology	087 - Esthetician
65	Advisor Fund	Cosmetology	160- Mobile Shops
66	Advisor Fund	Cosmetology	175 - Nail Technician Shop
67	Advisor Fund	Cosmetology	176 - Esthetics Shop
68	Advisor Fund	Cosmetology	Apprentices
69	Advisor Fund	Dietetics	074 - Dietitian
70	Advisor Fund	Dietetics	074 - Dietitian - INTERIM Telehealth Registration (TELE)
71	Advisor Fund	Dietetics	074 - Dietitian - PROV
72	Advisor Fund	Dietetics	074 - Dietitian Telehealth License - TELL
73	Advisor Fund	Dietetics	074 - Dietitian Telehealth Provisional License - TELP
74	Advisor Fund	Dietetics	074 - Dietitian Telehealth Provisional Registration - TERP
75	Advisor Fund	Dietetics	074 - Dietitian Telehealth Registration - TELR
76	Advisor Fund	Electrology	108 - Electrologist
77	Advisor Fund	Electrology	109 - Electrology Shop
78	Advisor Fund	Foresters	148 -Forester - EMGY (Emergency Temporary License)
79	Advisor Fund	Foresters	148-Forester
80	Advisor Fund	Funeral Service	019 - Embalmer
81	Advisor Fund	Funeral Service	019 - Embalmer - PROV
82	Advisor Fund	Funeral Service	019 - Embalmer Apprentice
83	Advisor Fund	Funeral Service	022 - Funeral Director

84	Advisor Fund	Funeral Service	022 - Funeral Director - PROV
85	Advisor Fund	Funeral Service	022- Funeral Director Apprentice
86	Advisor Fund	Funeral Service	023 - Funeral Establishment
87	Advisor Fund	Funeral Service	116 - Removal Personnel
88	Advisor Fund	Funeral Service	154 - Limited Services Establishment
89	Advisor Fund	Funeral Service	171 - Disposition Facility Personnel
90	Advisor Fund	Funeral Service	172 - Disposition Facility
91	Advisor Fund	Funeral Service	VT State Jurisprudence Exam Fee
92	Advisor Fund	Hearing Aid Dispenser	063 - Hearing Aid Dispenser
93	Advisor Fund	Hearing Aid Dispenser	063 - Hearing Aid Dispenser - INTERIM Telehealth Registration (TELE)
94	Advisor Fund	Hearing Aid Dispenser	063- Hearing Aid Dispenser Temp
95	Advisor Fund	Hearing Aid Dispenser	VT State Jurisprudence Exam Fee
96	Advisor Fund	Licensed Master's Social Workers	156- Licensed Master's Social Workers
97	Advisor Fund	Licensed Master's Social Workers	156- Licensed Master's Social Workers - INTERIM Telehealth Registration (Tele)
98	Advisor Fund	Licensed Master's Social Workers	156- Licensed Master's Social Workers - PROV
99	Advisor Fund	Massage Therapy	164-Massage Therapist, Body Worker, Touch Professionals
100	Advisor Fund	Midwifery	107 - Midwife
101	Advisor Fund	Midwifery	107 - Midwife - INTERIM Telehealth Registration (TELE)
102	Advisor Fund	Midwifery	107 - Midwife Telehealth License
103	Advisor Fund	Midwifery	107 - Midwife Telehealth Registration
104	Advisor Fund	Mixed Martial Arts	166 - Mixed Martial Art Promoter
105	Advisor Fund	Mixed Martial Arts	167 - Mixed Martial Art Event
106	Advisor Fund	Mixed Martial Arts	168 - Mixed Martial Art Contestant
107	Advisor Fund	Mixed Martial Arts	168 - Mixed Martial Art Contestant
108	Advisor Fund	Mixed Martial Arts	169 - Mixed Martial Art Participant (Referee, Judge, Matchmaker, Corner, Second, Manager) Charge fee each specialty
109	Advisor Fund	Motor Vehicle Racing	069- Single Event Permit
110	Advisor Fund	Motor Vehicle Racing	069- Single Event Permit
111	Advisor Fund	Motor Vehicle Racing	070 - Unlimited Event Permit
112	Advisor Fund	Motor Vehicle Racing	070 - Unlimited Event Permit
113	Advisor Fund	Motor Vehicle Racing	071- Annual Event Permit
114	Advisor Fund	Motor Vehicle Racing	071- Annual Event Permit
115	Advisor Fund	Naturopathy	099 - Naturopathic Physician
116	Advisor Fund	Naturopathy	099 - Naturopathic Physician - INTERIM Telehealth Registration (TELE)
117	Advisor Fund	Naturopathy	099 - Naturopathic Physician - PROV

Funding Structure Study | Professional Regulatory Fee Fund

118	Advisor Fund	Naturopathy	099 - Naturopathic Physician Telehealth License - TELL
119	Advisor Fund	Naturopathy	099 - Naturopathic Physician Telehealth Provisional License - TELP
120	Advisor Fund	Naturopathy	099 - Naturopathic Physician Telehealth Provisional Registration - TERP
121	Advisor Fund	Naturopathy	099 - Naturopathic Physician Telehealth Registration - TELR
122	Advisor Fund	Notary	157 -Notary
123	Advisor Fund	Nursing Home Administration	027 - Nursing Home Administrator
124	Advisor Fund	Nursing Home Administration	027 - Nursing Home Administrator - INTERIM Telehealth Registration (TELE)
125	Advisor Fund	Nursing Home Administration	027 - Nursing Home Administrator - Provisional Administrator - PVAD
126	Advisor Fund	Nursing Home Administration	027 - Nursing Home Administrator Telehealth License - TELL
127	Advisor Fund	Nursing Home Administration	027 - Nursing Home Administrator Telehealth Provisional License - TELP
128	Advisor Fund	Nursing Home Administration	027 - Nursing Home Administrator Telehealth Provisional Registration - TERP
129	Advisor Fund	Nursing Home Administration	027 - Nursing Home Administrator Telehealth Registration - TELR
130	Advisor Fund	Nursing Home Administration	027-AIT
131	Advisor Fund	Nursing Home Administration	027-Prov
132	Advisor Fund	Nursing Home Administration	VT State Jurisprudence Exam Fee
133	Advisor Fund	Occupational Therapy	072 - Occupational Therapist
134	Advisor Fund	Occupational Therapy	072 - Occupational Therapist - INTERIM Telehealth Registration (TELE)
135	Advisor Fund	Occupational Therapy	072 - Occupational Therapist - PROV
136	Advisor Fund	Occupational Therapy	072 - Occupational Therapist Telehealth License - TELL
137	Advisor Fund	Occupational Therapy	072 - Occupational Therapist Telehealth Provisional License - TELP
138	Advisor Fund	Occupational Therapy	072 - Occupational Therapist Telehealth Provisional Registration - TERP
139	Advisor Fund	Occupational Therapy	072 - Occupational Therapist Telehealth Registration - TELR
140	Advisor Fund	Occupational Therapy	072-Temp
141	Advisor Fund	Occupational Therapy	073 - Occupational Therapy Assistant
142	Advisor Fund	Occupational Therapy	073 - Occupational Therapy Assistant - INTERIM Telehealth Registration (TELE)
143	Advisor Fund	Occupational Therapy	073 - Occupational Therapy Assistant - PROV



Funding Structure Study | Professional Regulatory Fee Fund

144	Advisor Fund	Occupational Therapy	073 - Occupational Therapy Assistant Telehealth License - TELL
145	Advisor Fund	Occupational Therapy	073 - Occupational Therapy Assistant Telehealth Provisional License - TELP
146	Advisor Fund	Occupational Therapy	073 - Occupational Therapy Assistant Telehealth Provisional Registration - TERP
147	Advisor Fund	Occupational Therapy	073 - Occupational Therapy Assistant Telehealth Registration - TELR
148	Advisor Fund	Occupational Therapy	073-Temp
149	Advisor Fund	Opticianry	028 - Optician
150	Advisor Fund	Opticianry	028 - Optician - INTERIM Telehealth Registration (TELE)
151	Advisor Fund	Opticianry	028 - Optician - PROV
152	Advisor Fund	Opticianry	029 - Optician - Trainee
153	Advisor Fund	Opticianry	029 - Optician - Trainee - INTERIM Telehealth Registration (TELE)
154	Advisor Fund	Peer Support	Peer Support Provider
155	Advisor Fund	Peer Support	Recovery Support Specialist
156	Advisor Fund	Physical Therapy	040 - Physical Therapist
157	Advisor Fund	Physical Therapy	040 - Physical Therapist - INTERIM Telehealth Registration (TELE)
158	Advisor Fund	Physical Therapy	040 - Physical Therapist - PROV
159	Advisor Fund	Physical Therapy	040 - Physical Therapist Telehealth License - TELL
160	Advisor Fund	Physical Therapy	040 - Physical Therapist Telehealth Provisional License - TELP
161	Advisor Fund	Physical Therapy	040 - Physical Therapist Telehealth Provisional Registration - TERP
162	Advisor Fund	Physical Therapy	040 - Physical Therapist Telehealth Registration - TELR
163	Advisor Fund	Physical Therapy	041 - Physical Therapist Assistant
164	Advisor Fund	Physical Therapy	041 - Physical Therapist Assistant - INTERIM Telehealth Registration (TELE)
165	Advisor Fund	Physical Therapy	041 - Physical Therapist Assistant - PROV
166	Advisor Fund	Physical Therapy	041 - Physical Therapist Assistant Telehealth License - TELL
167	Advisor Fund	Physical Therapy	041 - Physical Therapist Assistant Telehealth Provisional License - TELP
168	Advisor Fund	Physical Therapy	041 - Physical Therapist Assistant Telehealth Provisional Registration - TERP
169	Advisor Fund	Physical Therapy	041 - Physical Therapist Assistant Telehealth Registration - TELR
170	Advisor Fund	PI & Security	044-IS - Private Investigative & Security Services Agency
171	Advisor Fund	PI & Security	044-PI - Private Investigative Agency
172	Advisor Fund	PI & Security	044-SS - Security Services Agency

Funding Structure Study | Professional Regulatory Fee Fund

173	Advisor Fund	PI & Security	046 - Registered Investigative/Security Employee (ARMED)
174	Advisor Fund	PI & Security	046 - Registered Investigative/Security Employee (UNARMED)
175	Advisor Fund	PI & Security	046 -Registered Investigative/Security Employee - EMGY (Emergency Temporary License)
176	Advisor Fund	PI & Security	065- Transitory License Private Investigator
177	Advisor Fund	PI & Security	066 - Licensed Private Investigator/Security Guard - EMGY (Emergency Temporary License)
178	Advisor Fund	PI & Security	066 - Licensed Private Investigator/Security Guard (ARMED)
179	Advisor Fund	PI & Security	066 - Licensed Private Investigator/Security Guard (UNARMED)
180	Advisor Fund	PI & Security	119 - Licensed Firearms Training Instructor
181	Advisor Fund	PI & Security	119- Licensed Guard Dog Training Instructor
182	Advisor Fund	Pollution Abatement Facility Operators	153 - Pollution Abatement Facility Operators
183	Advisor Fund	Pollution Abatement Facility Operators	153 - Pollution Abatement Facility Operators - EMGY (Emergency Temporary License)
184	Advisor Fund	Pollution Abatement Facility Operators	153 - Pollution Abatement Facility Operator - PROV
185	Advisor Fund	Property Inspectors	143 -Property Inspectors
186	Advisor Fund	Psychoanalysis	098 - Psychoanalyst
187	Advisor Fund	Psychoanalysis	098 - Psychoanalyst - INTERIM Telehealth Registration (TELE)
188	Advisor Fund	Psychoanalysis	098 - Psychoanalyst - PROV
189	Advisor Fund	Psychoanalysis	098 - Psychoanalyst Telehealth License - TELL
190	Advisor Fund	Psychoanalysis	098 - Psychoanalyst Telehealth Provisional License - TELP
191	Advisor Fund	Psychoanalysis	098 - Psychoanalyst Telehealth Provisional Registration - TERP
192	Advisor Fund	Psychoanalysis	098 - Psychoanalyst Telehealth Registration - TELR
193	Advisor Fund	Radiologic Technology	034-IRP - Ionizing Radiation Privileges (Physicians)
194	Advisor Fund	Radiologic Technology	049 - Nuclear Medicine Technologist
195	Advisor Fund	Radiologic Technology	049 - Nuclear Medicine Technologist - INTERIM Telehealth Registration (TELE)
196	Advisor Fund	Radiologic Technology	049 - Nuclear Medicine Technologist - PROV
197	Advisor Fund	Radiologic Technology	050 - Radiation Therapist

Funding Structure Study | Professional Regulatory Fee Fund

198	Advisor Fund	Radiologic Technology	050 - Radiation Therapist - INTERIM Telehealth Registration (TELE)
199	Advisor Fund	Radiologic Technology	050 - Radiation Therapist - PROV
200	Advisor Fund	Radiologic Technology	051 - Radiologic Technologist (Radiography)
201	Advisor Fund	Radiologic Technology	051 - Radiologic Technologist (Radiography) - INTERIM Telehealth Registration (TELE)
202	Advisor Fund	Radiologic Technology	051 - Radiologic Technologist (Radiography) - PROV
203	Advisor Fund	Radiologic Technology	053- Radiologic Technologist Limited License
204	Advisor Fund	Radiologic Technology	Radiologic Evaluation (Inspection)
205	Advisor Fund	Real Estate Appraisal	079-TRNE - Certified Residential Real Estate Appraiser - Trainee
206	Advisor Fund	Real Estate Appraisal	079-TRNE - Certified Residential Real Estate Appraiser - Trainee
207	Advisor Fund	Real Estate Appraisal	080-TRNE - Certified General Real Estate Appraiser - Trainee
208	Advisor Fund	Real Estate Appraisal	080-TRNE - Certified General Real Estate Appraiser - Trainee
209	Advisor Fund	Real Estate Appraisers	077 - FED Federally Regulated Appraisal Management Company
210	Advisor Fund	Real Estate Appraisers	077 - FED Federally Regulated Appraisal Management Company
211	Advisor Fund	Real Estate Appraisers	077-BRCH - Registered Appraisal Management Company - Branch Office
212	Advisor Fund	Real Estate Appraisers	077-BRCH - Registered Appraisal Management Company - Branch Office
213	Advisor Fund	Real Estate Appraisers	077-MAIN - Registered Appraisal Management Company - Main Office
214	Advisor Fund	Real Estate Appraisers	077-MAIN - Registered Appraisal Management Company - Main Office
215	Advisor Fund	Real Estate Appraisers	078 - Licensed Real Estate Appraiser
216	Advisor Fund	Real Estate Appraisers	079 - Certified Residential Real Estate Appraiser
217	Advisor Fund	Real Estate Appraisers	079-Temp
218	Advisor Fund	Real Estate Appraisers	080 - Certified General Real Estate Appraiser
219	Advisor Fund	Real Estate Appraisers	080-Temp
220	Advisor Fund	Residential Contractors	173- Residential Contractor -Individual After 4/1/2023
221	Advisor Fund	Residential Contractors	174 - Residential Contractor -Business After 4/1/2023
222	Advisor Fund	Respiratory Care	122 - Respiratory Care Practitioner
223	Advisor Fund	Respiratory Care	122 - Respiratory Care Practitioner - INTERIM Telehealth Registration (TELE)
224	Advisor Fund	Respiratory Care	122 - Respiratory Care Practitioner - PROV

Funding Structure Study | Professional Regulatory Fee Fund

225	Advisor Fund	Respiratory Care	122 - Respiratory Care Practitioner Telehealth License - TELL
226	Advisor Fund	Respiratory Care	122 - Respiratory Care Practitioner Telehealth Provisional License - TELP
227	Advisor Fund	Respiratory Care	122 - Respiratory Care Practitioner Telehealth Provisional Registration - TERP
228	Advisor Fund	Respiratory Care	122 - Respiratory Care Practitioner Telehealth Registration - TELR
229	Advisor Fund	Respiratory Care	122-STDT
230	Advisor Fund	Speech Language Pathologist	144 - Speech Language Pathologist
231	Advisor Fund	Speech Language Pathologist	144 - Speech Language Pathologist - PVAD
232	Advisor Fund	Speech Language Pathologist	144 - Speech Language Pathologist - INTERIM Telehealth Registration (TELE)
233	Advisor Fund	Speech Language Pathologist	144 - Speech Language Pathologist Telehealth License - TELL
234	Advisor Fund	Speech Language Pathologist	144 - Speech Language Pathologist Telehealth Provisional License - TELP
235	Advisor Fund	Speech Language Pathologist	144 - Speech Language Pathologist Telehealth Provisional Registration - TERP
236	Advisor Fund	Speech Language Pathologist	144 - Speech Language Pathologist Telehealth Registration - TELR
237	Advisor Fund	Speech Language Pathologist	144-Prov
238	Advisor Fund	Tattoo & Body Piercing	021 - Tattooist Operator
239	Advisor Fund	Tattoo & Body Piercing	021-APPN - Tattooist - Apprentice
240	Advisor Fund	Tattoo & Body Piercing	102 - Permanent Cosmetic Tattooist
241	Advisor Fund	Tattoo & Body Piercing	102-APPN - Permanent Cosmetic Tattooist - Apprentice
242	Advisor Fund	Tattoo & Body Piercing	105 - Tattooist Shop
243	Advisor Fund	Tattoo & Body Piercing	111 - Body Piercing Operator
244	Advisor Fund	Tattoo & Body Piercing	111-APPN - Body Piercing - Apprentice
245	Advisor Fund	Tattoo & Body Piercing	112 - Body Piercing & Tattooist Operator
246	Advisor Fund	Tattoo & Body Piercing	112-APPN - Body Piercing & Tattooist - Apprentice
247	Advisor Fund	Tattoo & Body Piercing	113 - Body Piercing Shop
248	Advisor Fund	Tattoo & Body Piercing	114 - Body Piercing & Tattooist Shop
249	Advisor Fund	Tattoo & Body Piercing	177 - Permanent Cosmetic Tattooist Shop
250	Advisor Fund	Wastewater/Water System Designer	152-Wastewater/Water System Designer
251	Advisor Fund	Wastewater/Water System Designer	152-Wastewater/Water System Designer - EMGY (Emergency Temporary License)
252	Advisor Fund	Well Drillers	165 - Well Driller
253	Advisor Fund	Well Drillers	165 - Well Driller - EMGY (Emergency Temporary License)

254	Board of Allied Mental Health	Clinical Mental Health Counselor	068 - Licensed Clinical Mental Health Counselor
255	Board of Allied Mental Health	Clinical Mental Health Counselor	068 - Licensed Clinical Mental Health Counselor - INTERIM Telehealth Registration (TELE)
256	Board of Allied Mental Health	Clinical Mental Health Counselor	068 - Licensed Clinical Mental Health Counselor - PROV
257	Board of Allied Mental Health	Clinical Mental Health Counselor	068 - Licensed Clinical Mental Health Counselor Telehealth License - TELL
258	Board of Allied Mental Health	Clinical Mental Health Counselor	068 - Licensed Clinical Mental Health Counselor Telehealth Provisional License - TELP
259	Board of Allied Mental Health	Clinical Mental Health Counselor	068 - Licensed Clinical Mental Health Counselor Telehealth Provisional Registration- TERP
260	Board of Allied Mental Health	Clinical Mental Health Counselor	068 - Licensed Clinical Mental Health Counselor Telehealth Registration- TELR
261	Board of Allied Mental Health	Marriage and Family Therapist	100 - Marriage and Family Therapist
262	Board of Allied Mental Health	Marriage and Family Therapist	100 - Marriage and Family Therapist - INTERIM Telehealth Registration (TELE)
263	Board of Allied Mental Health	Marriage and Family Therapist	100 - Marriage and Family Therapist - PROV
264	Board of Allied Mental Health	Marriage and Family Therapist	100 - Marriage and Family Therapist Telehealth License - TELL
265	Board of Allied Mental Health	Marriage and Family Therapist	100 - Marriage and Family Therapist Telehealth Provisional License - TELP
266	Board of Allied Mental Health	Marriage and Family Therapist	100 - Marriage and Family Therapist Telehealth Provisional Registration - TERP
267	Board of Allied Mental Health	Marriage and Family Therapist	100 - Marriage and Family Therapist Telehealth Registration - TELR
268	Board of Allied Mental Health	Psychotherapy	097 - Non-Licensed & Non-Certified Psychotherapist
269	Board of Allied Mental Health	Psychotherapy	097 - Non-Licensed & Non-Certified Psychotherapist - INTERIM Telehealth Registration (TELE)
270	Board of Architecture	Architect	003 - Architect
271	Board of Architecture	Architect	003 - Architect - EMGY (Emergency Temporary License)
272	Board of Dental Examiners	Dental	013 - Registered Certified Dental Assistant with Radiology Privileges
273	Board of Dental Examiners	Dental	013 - Registered Certified Dental Assistant with Radiology Privileges - INTERIM Telehealth Registration (TELE)
274	Board of Dental Examiners	Dental	014 - Registered Traditional Dental Assistant

275	Board of Dental Examiners	Dental	014 - Registered Traditional Dental Assistant - INTERIM Telehealth Registration (TELE)
276	Board of Dental Examiners	Dental	015 - Dental Hygienist
277	Board of Dental Examiners	Dental	015 - Dental Hygienist - PROV
278	Board of Dental Examiners	Dental	015 - Dental Hygienist Telehealth License - TELL
279	Board of Dental Examiners	Dental	015 - Dental Hygienist Telehealth Provisional License - TELP
280	Board of Dental Examiners	Dental	015 - Dental Hygienist Telehealth Provisional Registration - TERP
281	Board of Dental Examiners	Dental	015 - Dental Hygienist Telehealth Registration - TELR
282	Board of Dental Examiners	Dental	016 - Dentist
283	Board of Dental Examiners	Dental	016 - Dentist - INTERIM Telehealth Registration (TELE)
284	Board of Dental Examiners	Dental	016 - Dentist - PROV
285	Board of Dental Examiners	Dental	016 - Dentist Telehealth License - TELL
286	Board of Dental Examiners	Dental	016 - Dentist Telehealth Provisional License - TELP
287	Board of Dental Examiners	Dental	016 - Dentist Telehealth Provisional Registration - TERP
288	Board of Dental Examiners	Dental	016 - Dentist Telehealth Registration - TELR
289	Board of Dental Examiners	Dental	161- Dental Therapist
290	Board of Dental Examiners	Dental	161- Dental Therapist - INTERIM Telehealth Registration (TELE)
291	Board of Dental Examiners	Dental	161- Dental Therapist - PROV
292	Board of Dental Examiners	Dental	161- Dental Therapist Telehealth License - TELR
293	Board of Dental Examiners	Dental	161- Dental Therapist Telehealth Provisional License - TELP
294	Board of Dental Examiners	Dental	161- Dental Therapist Telehealth Registration - TELR
295	Board of Dental Examiners	Dental	161- Dental Therapist Telehealth Provisional Registration - TERP
296	Board of Land Surveyors	Land Surveying	024 - Land Surveyor
297	Board of Land Surveyors	Land Surveying	024 - Land Surveyor - EMGY (Emergency Temporary License)
298	Board of Land Surveyors	Landscape Architect	125 - Landscape Architect

299	Board of Nursing	Nursing	025 - Licensed Practical Nurse
300	Board of Nursing	Nursing	025 - Licensed Practical Nurse - INTERIM Telehealth Registration (TELE)
301	Board of Nursing	Nursing	025 - Licensed Practical Nurse - PROV
302	Board of Nursing	Nursing	025 - Licensed Practical Nurse - Temporary Permit for Re-Entry
303	Board of Nursing	Nursing	025 - Licensed Practical Nurse Telehealth License - TELL
304	Board of Nursing	Nursing	025 - Licensed Practical Nurse Telehealth Provisional License - TELP
305	Board of Nursing	Nursing	025 - Licensed Practical Nurse Telehealth Provisional Registration - TERP
306	Board of Nursing	Nursing	025 - Licensed Practical Nurse Telehealth Registration - TELR
307	Board of Nursing	Nursing	026 - Registered Nurse
308	Board of Nursing	Nursing	026 - Registered Nurse - INTERIM Telehealth Registration (TELE)
309	Board of Nursing	Nursing	026 - Registered Nurse - PROV
310	Board of Nursing	Nursing	026 - Registered Nurse - Temporary Permit for Re-Entry
311	Board of Nursing	Nursing	026 - Registered Nurse Telehealth License - TELL
312	Board of Nursing	Nursing	026 - Registered Nurse Telehealth Provisional License - TELP
313	Board of Nursing	Nursing	026 - Registered Nurse Telehealth Provisional Registration - TERP
314	Board of Nursing	Nursing	026 - Registered Nurse Telehealth Registration - TELR
315	Board of Nursing	Nursing	075 - Licensed Nursing Assistant
316	Board of Nursing	Nursing	075 - Licensed Nursing Assistant - INTERIM Telehealth Registration (TELE)
317	Board of Nursing	Nursing	075 - Licensed Nursing Assistant - PROV
318	Board of Nursing	Nursing	075 - Licensed Nursing Assistant Telehealth License - TELL
319	Board of Nursing	Nursing	075 - Licensed Nursing Assistant Telehealth Provisional License - TELP
320	Board of Nursing	Nursing	075 - Licensed Nursing Assistant Telehealth Provisional Registration - TERP
321	Board of Nursing	Nursing	075 - Licensed Nursing Assistant Telehealth Registration - TELR
322	Board of Nursing	Nursing	101 - Advanced Practice Registered Nurse
323	Board of Nursing	Nursing	101 - Advanced Practice Registered Nurse - INTERIM Telehealth Registration (TELE)
324	Board of Nursing	Nursing	101 - Advanced Practice Registered Nurse - PROV
325	Board of Nursing	Nursing	101 - Advanced Practice Registered Nurse Telehealth License - TELL

326	Board of Nursing	Nursing	101 - Advanced Practice Registered Nurse Telehealth Provisional License - TELP
327	Board of Nursing	Nursing	101 - Advanced Practice Registered Nurse Telehealth Provisional Registration - TERP
328	Board of Nursing	Nursing	101 - Advanced Practice Registered Nurse Telehealth Registration - TELR
329	Board of Nursing	Nursing	101 - Advanced Practice Registered Nurse - Temporary Permit for Re-Entry
330	Board of Optometry	Optometry	030 - Optometrist
331	Board of Optometry	Optometry	030 - Optometrist - INTERIM Telehealth Registration (TELE)
332	Board of Optometry	Optometry	030 - Optometrist - PROV
333	Board of Optometry	Optometry	030 - Optometrist Telehealth License - TELL
334	Board of Optometry	Optometry	030 - Optometrist Telehealth Provisional License - TELP
335	Board of Optometry	Optometry	030 - Optometrist Telehealth Provisional Registration - TERP
336	Board of Optometry	Optometry	030 - Optometrist Telehealth Registration - TELR
337	Board of Osteopathic Physicians and Surgeons	Osteopathy	031 - Limited Temporary Osteopathic Physician
338	Board of Osteopathic Physicians and Surgeons	Osteopathy	031 - Limited Temporary Osteopathic Physician
339	Board of Osteopathic Physicians and Surgeons	Osteopathy	031 - Limited Temporary Osteopathic Physician - INTERIM Telehealth Registration (TELE)
340	Board of Osteopathic Physicians and Surgeons	Osteopathy	031 - Limited Temporary Osteopathic Physician - INTERIM Telehealth Registration (TELE)
341	Board of Osteopathic Physicians and Surgeons	Osteopathy	032 - Osteopathic Physician
342	Board of Osteopathic Physicians and Surgeons	Osteopathy	032 - Osteopathic Physician - INTERIM Telehealth Registration (TELE)
343	Board of Osteopathic Physicians and Surgeons	Osteopathy	032 - Osteopathic Physician - PROV



344	Board of Osteopathic Physicians and Surgeons	Osteopathy	032 - Osteopathic Physician Telehealth License - TELL
345	Board of Osteopathic Physicians and Surgeons	Osteopathy	032 - Osteopathic Physician Telehealth Provisional License - TELP
346	Board of Osteopathic Physicians and Surgeons	Osteopathy	032 - Osteopathic Physician Telehealth Provisional Registration - TERP
347	Board of Osteopathic Physicians and Surgeons	Osteopathy	032 - Osteopathic Physician Telehealth Registration - TELR
348	Board of Osteopathic Physicians and Surgeons	Osteopathy	162- Osteopathic Physician IMLC Compact
349	Board of Pharmacy	Pharmacy	033 - Pharmacist
350	Board of Pharmacy	Pharmacy	033 - Pharmacist - EMGY (Emergency Temporary License)
351	Board of Pharmacy	Pharmacy	033 - Pharmacist - INTERIM Telehealth Registration (TELE)
352	Board of Pharmacy	Pharmacy	033 - Pharmacist - PROV
353	Board of Pharmacy	Pharmacy	033 - Pharmacist Telehealth License - TELL
354	Board of Pharmacy	Pharmacy	033 - Pharmacist Telehealth Provisional License - TELP
355	Board of Pharmacy	Pharmacy	033 - Pharmacist Telehealth Provisional Registration - TERP
356	Board of Pharmacy	Pharmacy	033 - Pharmacist Telehealth Registration - TELR
357	Board of Pharmacy	Pharmacy	033-INTN - Pharmacist Intern
358	Board of Pharmacy	Pharmacy	035 - Investigation & Research Project Pharmacy
359	Board of Pharmacy	Pharmacy	036 - Non-Resident Pharmacy
360	Board of Pharmacy	Pharmacy	037 - Institutional Pharmacy
361	Board of Pharmacy	Pharmacy	038 - Instate Pharmacy - Emergency Temporary License
362	Board of Pharmacy	Pharmacy	038 - Instate Pharmacy (Compounding/Home Infusion)
363	Board of Pharmacy	Pharmacy	039 - Wholesale Drug Outlet

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364	Board of Pharmacy	Pharmacy	121 - Pharmacy Technician
365	Board of Pharmacy	Pharmacy	121 - Pharmacy Technician - PROV
366	Board of Pharmacy	Pharmacy	121 - Pharmacy Technician - INTERIM Telehealth Registration (TELE)
367	Board of Pharmacy	Pharmacy	121 - Pharmacy Technician -EMGY (Emergency Temporary License)
368	Board of Pharmacy	Pharmacy	124 - In-State Manufacturing Drug Outlet
369	Board of Pharmacy	Pharmacy	133 - Out of State Tele-pharmacist
370	Board of Pharmacy	Pharmacy	140 - Community Based Long Term Care Pharmacy
371	Board of Pharmacy	Pharmacy	141 - Institutional Long Term Care Pharmacy
372	Board of Pharmacy	Pharmacy	142 - Nuclear/Radiologic Pharmacy
373	Board of Pharmacy	Pharmacy	158 - 503B Outsourcer
374	Board of Pharmacy	Pharmacy	159 - Third Party Logistics Provider
375	Board of Pharmacy	Pharmacy	163- Non-Resident Manufacturer
376	Board of Pharmacy	Pharmacy	Reinspection Fee
377	Board of Professional Engineering	Engineering	017-Engineer Intern
378	Board of Professional Engineering	Engineering	018 - Professional Engineer - EMGY (Emergency Temporary License)
379	Board of Professional Engineering	Engineering	018 - Professional Engineer (each specialty additional charge \$115)
380	Board of Psychological Examiners	Psychology	047 - Psychologist - Doctorate Telehealth License - TELL
381	Board of Psychological Examiners	Psychology	047 - Psychologist - Doctorate Telehealth Provisional License - TELP
382	Board of Psychological Examiners	Psychology	047 - Psychologist - Doctorate Telehealth Provisional Registration - TERP
383	Board of Psychological Examiners	Psychology	047 - Psychologist - Doctorate Telehealth Registration - TELR
384	Board of Psychological Examiners	Psychology	047 - Psychologist - Master

385	Board of Psychological Examiners	Psychology	047 - Psychologist - Master - INTERIM Telehealth Registration (TELE)
386	Board of Psychological Examiners	Psychology	047 - Psychologist - Master - PROV
387	Board of Psychological Examiners	Psychology	047 - Psychologist - Master Telehealth License - TELL
388	Board of Psychological Examiners	Psychology	047 - Psychologist - Master Telehealth Provisional License - TELP
389	Board of Psychological Examiners	Psychology	047 - Psychologist - Master Telehealth Provisional Registration - TERP
390	Board of Psychological Examiners	Psychology	047 - Psychologist - Master Telehealth Registration - TELR
391	Board of Psychological Examiners	Psychology	048 - Psychologist - Doctorate
392	Board of Psychological Examiners	Psychology	048 - Psychologist - Doctorate - PROV
393	Board of Psychological Examiners	Psychology	048-Doctorate Temp
394	Board of Psychological Examiners	Psychology	048-Doctorate Temp - INTERIM Telehealth Registration (TELE)
395	Board of Public Accountancy	Accountancy	001 - Certified Public Accountant
396	Board of Public Accountancy	Accountancy	002 - Registered Public Accountant
397	Board of Public Accountancy	Accountancy	092 - Accounting Firm
398	Board of Public Accountancy	Accountancy	092 - Accounting Firm - SOLE
399	Board of Public Accountancy	Accountancy	192 - Non-Resident Accounting Firm with Mobility
400	Board of Public Accountancy	Accountancy	192 - Non-Resident Accounting Firm with Mobility - SOLE
401	Board of Veterinary Medicine	Veterinary	052 - Veterinarian
402	Board of Veterinary Medicine	Veterinary	052 - Veterinarian - INTERIM Telehealth Registration (TELE)
403	Board of Veterinary Medicine	Veterinary	052 - Veterinarian - PROV

404	Board of Veterinary Medicine	Veterinary	052 - Veterinarian Telehealth License - TELL
405	Board of Veterinary Medicine	Veterinary	052 - Veterinarian Telehealth Provisional License - TELP
406	Board of Veterinary Medicine	Veterinary	052 - Veterinarian Telehealth Provisional Registration - TERP
407	Board of Veterinary Medicine	Veterinary	052 - Veterinarian Telehealth Registration - TELR
408	Chiropractic Board	Chiropractic	006 - Chiropractic Physician
409	Chiropractic Board	Chiropractic	006 - Chiropractic Physician - INTERIM Telehealth Registration (TELE)
410	Chiropractic Board	Chiropractic	006 - Chiropractic Physician - PROV
411	Chiropractic Board	Chiropractic	006 - Chiropractic Physician Telehealth License - TELL
412	Chiropractic Board	Chiropractic	006 - Chiropractic Physician Telehealth Provisional License - TELP
413	Chiropractic Board	Chiropractic	006 - Chiropractic Physician Telehealth Provisional Registration - TERP
414	Chiropractic Board	Chiropractic	006 - Chiropractic Physician Telehealth Registration - TELR
415	Chiropractic Board	Chiropractic	106- Chiropractic Intern
416	Chiropractic Board	Chiropractic	106- Chiropractic Intern - INTERIM Telehealth Registration (TELE)
417	Real Estate Commission	Real Estate	081 - Real Estate Broker
418	Real Estate Commission	Real Estate	082 - Real Estate Salesperson
419	Real Estate Commission	Real Estate	083-BRCH - Real Estate Company - Branch Office
420	Real Estate Commission	Real Estate	083-MAIN - Real Estate Company - Main Office