

**TITLE 16. PHYSICIAN ASSISTANT BOARD
DEPARTMENT OF CONSUMER AFFAIRS**

INITIAL STATEMENT OF REASONS

Hearing Date: The Physician Assistant Board (Board) has not scheduled a public hearing on this proposed action.

Subject Matter of Proposed Regulations: Retired Status Updates and Returned Fingerprint Requirement

Sections Affected: Amend Sections 1399.507 and 1399.515 in Division 13.8 of Title 16 of the California Code of Regulations (CCR).

Background and Statement of the Problem:

The Board licenses, regulates, and investigates complaints against licensed physician assistants (PAs) in California, totaling approximately 19,410 licensees. It is the Board's duty to enforce and administer the Physician Assistant Practice Act (Chapter 7.7 (commencing with section 3500) of Division 2 of the BPC) (Practice Act). The Board is authorized to establish necessary rules and regulations for the enforcement of the Practice Act and the laws subject to its jurisdiction (Business and Professions Code (BPC) section 3510).

Business and Professions Code section 3521.3 authorizes the Board to establish, by regulation, a system for the placement of a license on a retired status and for restoration to active status from a retired status. On April 1, 2019, the Board adopted Title 16, California Code of Regulations (CCR) Section 1399.515 to implement a retired status including the form incorporated by reference entitled "Application for Retired Status (Form PAB-RET, 01/19)," and to establish requirements for restoring a license to active status from retired status. This rulemaking updates the Board's regulations to ensure minimum standards for public protection are met for those licensees applying for retired status and for those seeking an active license after being in a retired status, including all of the following proposed changes.

Assembly Bill (AB) 2461 (Flora, Ch. 300, 2018) amended California Penal Code section 11105.2(d) so that the Board is required to notify the Department of Justice (DOJ) when the licensee can no longer renew or reinstate their license. The DOJ then stops reporting subsequent state or federal arrests or dispositions to the Board. CCR section 1399.515 currently allows individuals with a retired status license to restore their license to active status if they complete certain requirements but fingerprinting to allow receipt of criminal offender record information (CORI) from the DOJ's database is not included. This proposal would address that issue by requiring an applicant, on written request of the Board, to furnish to the Department of Justice a full set of fingerprints for the purposes of conducting criminal history record checks pursuant to BPC section 144. Submission of fingerprints would only be requested by the Board if an electronic record of the submission of the individual's fingerprints does not exist in the Department of Justice's criminal offender identification database.

BPC section 3521.3 requires the Board to establish minimum qualifications for the restoration of a license in a retired status to an active status but does mention a time frame for when

restoration is not permissible. BPC section 3526 prohibits an applicant from reinstating or restoring a license to active status within 5 years after its expiration. To resolve the possible ambiguity between the two statutes, the Board proposes to change the restoration requirements by treating the retired licensee applicant whose original license expired more than 5 years prior to application for restoration as a new applicant according to the authority in BPC section 3526.

This proposal would therefore amend CCR Section 1399.515 to allow a licensee who has been in retired status for more than five years to obtain an active license by applying for a new license in accordance with CCR section 1399.506 (which specifies the process for applying for a new license) and showing “proof” of passage of the National Commission on Certification of Physician Assistants’ (NCCPA’s) Physician Assistant National Re-Certifying Exam (PANRE), as specified. CCR section 1399.507 would also be amended to further specify that the written examination for initial licensure as a physician assistant is the NCCPA’s Physician Assistant National Certifying Examination (PANCE) while the written examination for a licensee who has been in retired status for more than five years, as specified, would be the examination specified in Section 1399.515 (PANRE). This helps ensure consistency in treatment of all individuals whose active licenses have expired and currency of knowledge upon restoration to active status. References to the Board establishing the passing score for the PANCE examination would also be struck and replaced with references to the NCCPA, the entity who scores the PANCE examination.

This proposal would also further update this regulation and accompanying Form PAB-RET to reflect changes made to this section, delete obsolete provisions, provide additional notice and direction to applicants; and, make other non-substantive changes to the text for grammar, punctuation, consistency in use of terminology, removal of gendered pronouns, address updates for the Board and paragraph re-numbering to ensure chronological and sequential numbering of paragraphs in this section.

Anticipated benefits from this regulatory action:

The Board has determined that this regulatory proposal will have the following benefits to the health and welfare of California residents:

This proposal would include a process for requiring fingerprinting to allow the Board to receive criminal offender record information (CORI) from the DOJ’s database for an applicant if an electronic record of the submission of the individual’s fingerprints does not exist in the Department of Justice’s criminal offender identification database for the Board. This furthers the Board’s consumer protection mandate by allowing a more effective background check to ensure no grounds for denial of the application to restore to active status exist and that an applicant is safe to return to active practice with the public.

Placing a 5-year limitation on how long an individual can restore their license from retired status to active status and requiring a recertifying examination for those seeking active status after more than 5 years in retired status ensures currency of knowledge for those who re-enter practice after being retired for years. Updating the Board’s requirements for obtaining a retired status or restoring a license to active status also helps alleviate confusion for licensees regarding the Board’s requirements for acquiring both types of license statuses, thereby facilitating compliance and a simple process for retirement planning purposes.

Specific purpose of, and rationale for, each adoption, amendment, or repeal:

The Board proposes amendments to 16 CCR sections 1399.507 and 1399.515 for the following reasons:

Amend Section 1399.507 – Examination Required

Purpose: The Board is proposing to add the word “initial” before licensure and the acronym “NCCPA” as a short form reference for the National Commission on Certification of Physician Assistants for ease of reference for this regulation. The Board proposes to strike the word “board” and instead add the acronym “NCCPA” in the second sentence of the existing regulation and spell out the NCCPA’s examination entitled “Physician Assistant National Certifying Examination” (PANCE). The Board is also proposing to correct grammar by changing the word “have” to “has” for proper verb-noun agreement with the singular “applicant,” and, to delete the words “his or her” and replace them with “their.”

Finally, for consistency with the amendments proposed in newly proposed sections CCR 1399.515(d)(1) and (2) (see below explanation for further rationale), the Board proposes to add direction to applicants seeking a license after being in retired status for more than five years, that the written examination is the examination specified in Section 1399.515. This avoids applicant confusion regarding which examinations need to be taken to obtain a license based upon their status (initial applicant vs. retired status applicant).

Rationale: The Board adds the word “initial” existing language to avoid confusion regarding which applicants need to take the “PANCE” examination, which is the examination given by the National Commission on Certification of Physician Assistants for applicants applying for initial licensure.

With respect to the changes to add the examination’s title and NCCPA as the entity who sets the passing score, BPC section 3517 had previously provided in part: “The Board shall, however, establish a passing score for each examination” and “The time and place of examinations shall be fixed by the board.” The current PA examination (PANCE) is administered by a private organization – the National Commission on Certification of Physician Assistants (NCCPA) – who sets the score for that examination. BPC section 3517 was amended with the passage of SB 806 (Roth, Chapter 649, Statutes of 2021) which removed the provisions quoted above, thereby removing the requirement that the Board establish a passing score for the examination and fix the time and place of the examination.

This amendment is necessary to ensure accuracy and notice to applicants regarding this examination and make the regulation consistent with BPC section 3517 by removing the words “established by the board” and instead replacing it with “NCCPA.” For better notice to the applicants regarding which NCCPA examination they would be required to successfully complete, the Board adds the specific title of the examination “Physician Assistant National Certifying Examination” and for ease of reference, the well-known acronym for this examination in the regulated community: “PANCE.”

The proposal also seeks to remove gender-specific language and replaces it with gender-neutral language pursuant to Assembly Concurrent Resolution No. 260 of 2018 (ACR 260), wherein the legislature urged state agencies to use gender neutral pronouns and avoid the use of gendered

pronouns in drafting regulations.

Amend CCR section 1399.515 – Retired Status

(1) Amend subsection (a)

Purpose: Updates the name of the form titled “Application for Retired License (Form PAB-RET, 01/19)” by striking the existing revision date and adding in a new revision date of 04/25. The form, incorporated by reference and described below, identifies all requisite information an applicant must provide when applying for a retired license. Changes to the form are more specifically described below.

Rationale: This change is necessary to accurately reflect the date the Board approved the proposed changes to this form.

(2) Amend subsection (a)(2)

Purpose: This proposal would make the following clarifying changes to this subsection:

The applicant’s physician assistant license is not canceled, suspended, revoked, or otherwise punitively restricted by the board or subject to disciplinary action by the board under the Medical Practice Act (commencing with Section 2000 of the Code), Physician Assistant Practice Act (commencing with Section 3500 of the Code), or regulations adopted pursuant to those practice acts, ~~and by the board.~~

Rationale: This change is necessary to resolve a potential ambiguity regarding what licensing board’s action would prohibit a licensee’s eligibility for the retired license status. To more clearly specify that the restrictions relate to disciplinary actions by this Board, the Board proposes to strike “and by the board” from the end of this sentence and add “by the board” after the words “disciplinary action” as noted above. The Board adds the word “or” to this sentence for grammatical reasons that were necessitated by the aforementioned changes.

(3) Amend subsection (a)(3)

Purpose: This proposal would repeal the following introductory phrase: “~~Beginning one (1) year from the effective date of this regulation, t...~~”

Rationale: BPC section 3521.3 required the following: “(d) Beginning one year from the effective date of the regulations adopted pursuant to subdivision (a), if an applicant’s license is delinquent, the board shall deny an applicant’s application for a retired status license.” The intent was to allow a one-year window after the Board implemented a retired status where a licensee could switch from an expired or cancelled status to a retired status without paying a fee to reinstate their license to active status. This proposal strikes this obsolete grandfathering provision that allowed licensees who were delinquent (had expired or cancelled) to be eligible for the retired status license if they applied within one-year from the effective date of this regulation (originally effective April 1, 2019). Since that eligibility window passed April 1, 2020 and licensees have to not be delinquent to be eligible per BPC section 3521.3(d), this language should be repealed as no longer

necessary and to avoid applicant confusion. The repeal of the “t” and the capitalization and placement of “T” is necessary to revise the sentence after removal of the introductory phrase.

On January 8, 2026, the Board made the originally proposed change of revising the delinquency fee of \$25 to \$75 (per amendments made to the Board’s fee statutes at BPC section 3521.1(d)) through a non-substantive rulemaking (see OAL Matter No. 2025-1121-02). The proposed regulatory language has been revised under the Executive Officer’s delegated authority to make non-substantive changes to align with that amendment.

(4) Amend subsection (b)(2)

Purpose: This proposal adds language to include a limitation as to time when an individual can restore their license from retired status to active status, which is within five years of being issued a retired license.

- (5) Rationale: Assembly Concurrent Resolution No. 260 of 2018 (ACR 260) resolved that “state agencies should ... use gender-neutral pronouns and avoid the use of gendered pronouns when drafting policies, regulations, and other guidance.” This proposal would replace gendered pronouns with gender neutral nouns consistent with this State policy objective.

For the five-year limitation on reinstatement, as noted above, this time frame is consistent with the five-year cancellation provision in Business and Professions Code section 3526 for licensees who fail to renew their PA license in an active status within five years after their license expires. BPC section 3526 prohibits applicants from renewing or reinstating such a license. This 5-year reinstatement limitation for reinstating from a retired status helps ensure consistency in treatment of all individuals whose active licenses have expired for more than 5 years (and are legally prohibited from practicing medicine as a PA while in that status) and ensures currency of knowledge for those who re-enter practice after being retired for years.

On January 8, 2026, the Board made the originally proposed change of revising the gendered pronouns “his or her” to “their” through a non-substantive rulemaking (see OAL Matter No. 2025-1121-02). The proposed regulatory language has been revised under the Executive Officer’s delegated authority to make non-substantive changes to align with that amendment.

(6) Add subsection (b)(2)(E)

Purpose: Aside from adding new paragraphs within existing subsection (b)(2) for better organization and making other grammatical and punctuation changes consistent with the amendments proposed, this paragraph would be adopted to add a new fingerprinting requirement. The proposed requirement would mandate that on written request of the Board, the applicant shall furnish to the Department of Justice a full set of fingerprints for the purposes of conducting criminal history record checks pursuant to BPC section 144. Submission of fingerprints shall only be requested by

the Board if an electronic record of the submission of the individual's fingerprints does not exist in the Department of Justice's criminal offender identification database.

Rationale: Many retired licensees would have already been fingerprinted pursuant to the Board's authority in BPC section 144 prior to being placed in a retired status. Those licenses would be subject to restoration per BPC 3526, which allows renewal of any license within 5 years after expiration (similar status to those that would be retired since they are not renewable while in that status) and therefore the Board would still receive criminal record information (CORI) within 5 years after the license was placed in retired status (Penal Code section 11105.2 requires the Board to notify the Department of Justice when the license can no longer be reinstated). However, in the event that the Board somehow did not have CORI notifications for the particular individual, and it was discovered upon filing this application, this proposal would require the individual to provide fingerprints as an "applicant" for restoration to active license in accordance with the requirements in BPC section 144 upon written request of the Board. This helps ensure compliance with section 144 that requires the Board to fingerprint every "applicant" and also to ensure that there are no grounds for denial of the application based upon criminal convictions (as discussed above) per CCR section 1399.521(a) incorporating BPC sections 2221(denials based on unprofessional conduct) and 2236(a)(unprofessional conduct includes substantially related convictions) and CCR section 1399.523.5 (required denial actions against sex offenders).

Section 100 Changes: On January 8, 2026, the Board made the originally proposed change of revising the delinquency fee amount of \$25 to \$75 (in accordance with changes to BPC section 3521.1) through a non-substantive rulemaking (see OAL Matter No. 2025-1121-02). The proposed regulatory language has been revised under the Executive Officer's delegated authority to make non-substantive changes to align with that amendment.

(7) **Add subsection (d)(1)**

Purpose: This proposal would add a new requirement that if a licensee who has been in retired status for more than five years seeks an active license, the individual may apply for a new license pursuant to CCR section 1399.506 with the exception of the requirement to show passage of the PANCE written examination for applicants for initial licensure specified in Section 1399.507. In lieu of the passage of the PANCE, a licensee in retired status shall provide satisfactory proof of passage of the National Commission on Certification of Physician Assistants' (NCCPA) Physician Assistant National Recertifying Exam (PANRE) within the past ten (10) years immediately preceding the submission of their application in compliance with this subsection and meet the other application requirements specified by Section 1399.506 to be eligible for a new active license.

Rationale: BPC section 3521.3 authorizes the Board to set minimum requirements for restoration of a license in a retired status to active status but does not mention a time frame for when restoration is not permissible. However, BPC section 3526(b) provides, in part:

“A person who fails to renew their license or approval within five years after its expiration may not renew it, and it may not be reissued, reinstated, or restored after that time has elapsed, but that person may apply for and obtain a new license or approval...” if they meet specified requirements, including taking and passing “the examination, if any, that would be required of them if application for licensure was being made for the first time, or otherwise establishes to the satisfaction of the Board that, with due regard for the public interest, they are qualified to practice as a physician assistant.”

To resolve the possible ambiguity between the two statutes, the Board proposes to implement the requirements by treating the retired licensee applicant whose original license expired more than five years prior to application as an applicant for a new license according to the authority in BPC section 3526 and consistent with how all other licensees are treated who do not renew their licenses within five years of expiration. This proposal would therefore allow a licensee who has been in retired status for more than five years to obtain an active license again by applying for a new license in accordance with CCR section 1399.506 (which specifies the process for applying for a new license) and taking the PANRE as specified above. These amendments ensure continuing competency for the protection of the public, and provide consistent treatment for all individuals who held active licenses that have expired, regardless of the reason.

BPC section 3509 authorizes the Board to require the examination of applicants for licensure as a physician assistant who meet the requirements of the Practice Act. Existing regulations at CCR sections 1399.506 and 1399.507 specify the requirements for initial application and the Board’s requirements for examination but do not cover the requirements for those applicants seeking to return to active practice from retired status after being in retired status for more than five years. Further, upon review of the National Commission on Certification of Physician Assistants (NCCPA) requirements, the Board understands that exam candidates are not allowed to retake the PANCE exam once the exam has been passed, since, once successful, the physician assistant’s initial certification requirement is considered satisfied, and no further retakes are permitted or needed.

For those physician assistants who have already been certified (after passing the initial PANCE exam) and are seeking to show continued medical knowledge and competency, the NCCPA offers the PANRE (Physician Assistant National Recertifying Examination). As a result, to ensure those re-entering the profession from retired status meet minimum standards of competency, the Board proposes to require applicants show “proof” of passage of the PANRE examination after being in retired status for more than five years, as explained in subsection (d)(2) below. The Board will accept such examination results for the PANRE within the past ten (10) years immediately preceding the submission of a retired status applicant’s application, which is similar to the NCCPA’s ten-year re-certification window for this exam, and what the Board considers the minimum timeframe needed to show competence to safely return to practice.

Title 1, CCR Section 100 change: The original text approved by the Board at its November 17, 2025 Board meeting was amended to add the word “be” before the word “eligible” so that the sentence now reads: “In lieu of the passage of the PANCE, a licensee in retired status shall provide satisfactory proof of passage of the National

Commission on Certification of Physician Assistants' (NCCPA) Physician Assistant National Recertifying Exam (PANRE) within the past ten (10) years immediately preceding the submission of their application in compliance with this subsection and meet the other application requirements specified by Section 1399.506 to **be** eligible for a new active license." (Emphasis added.) The Executive Officer proposes to correct this under her authority to make non-substantive changes delegated to her by the Board. This addition is simply a grammatical change to correct a verb that was inadvertently left out in the original draft, and therefore does not affect any applicant's rights, responsibilities or duties under this proposal.

(8) Add subsection (d)(2)

Purpose: This proposal would add subdivision (d), paragraph (2) that would define proof of passage of the PANRE as determined by the NCCPA, which would include requiring the retired status licensee to access online the National Commission on Certification of Physician Assistants (NCCPA) website at www.nccpa.net, and follow all instructions required by the NCCPA to authorize the electronic release of their Physician Assistant National Recertifying Exam (PANRE) score directly to the Board to show passage of the PANRE exam. This subdivision would also require the Board to access the applicant's PANRE score and verify compliance with this paragraph through the NCCPA portal.

Rationale: For the reasons noted above in the rationale provided in subsection (d)(1), the Board under this proposal will require proof of passage of the PANRE as a requirement for issuance of an active license to an individual in retired status for more than five years. However, current regulations do not specify the manner and method of submission of their PANRE score or the current requirements for submission established by the NCCPA.

As a result, these changes that outline the NCCPA's process for submitting the PANRE score directly to the Board are needed to provide notice and avoid confusion for these types of applicants. In addition, such a definition helps ensure that the applicant in retired status provides the requisite documentary proof needed to establish passage of the PANRE examination consistent with proposed changes to adopt this standard in subsection (d)(1) and the requirements of the NCCPA, who administers this national exam. Further, to provide notice of how the applicant could confirm that their score has been received, this proposal would specify that that the "Board shall access the applicant's PANRE score and verify compliance with this paragraph through the NCCPA's portal as part of its review of the application submitted per Section 1399.506." These requirements are needed to accurately reflect the requirements for obtaining a new license consistent with Section 1399.506, to accurately reflect the process for obtaining and submitting scores that are issued by the NCCPA evidencing successful completion of the PANRE examination for these types of applicants, and provide applicants with notice of the type of proof to be furnished to the Board to demonstrate minimum qualifications are met to practice again as a physician assistant as authorized by BPC sections 3521.3 and 3526.

Amend Application for Retired Status (Form PAB-RET 04/25)

Purpose and Rationale: In addition to the changes noted above to revise the date of the form from

01/19 to 04/25, this proposal would make the following changes and for the following reasons:

- (1) remove the old Board logo, State seal and letterhead in the header and replace it with the new letterhead and Board logo to provide uniformity with the Board's forms,
- (2) first bullet and second bullet: remove references to deadlines and the old eligibility requirements regarding waiver of fees for those applying before April 1, 2020 including the introductory sentence that states "Prior to April 1, 2020, an individual's license may be delinquent when applying for retired status and no fees are required. On and after April 1, 2020, in order...", as these eligibility requirements are not relevant for applicants applying now (see rationale above for similar amendments to subsection (a)(3)). These changes would also ensure consistency with the amendments to the proposed regulatory language in subsection (a)(3),
- (3) first bullet: Make clarifying changes discussed in subsection (a)(2) above to relocate references to disciplinary action "by the board" to resolve ambiguity and give greater notice to the applicants as discussed in the rationale above for similar changes to subsection (a)(2),
- (4) make the following technical clean-up and otherwise non-substantive changes to the form to:
 - (A) remove gendered language "his or her" and replace it with nongendered pronoun "their" in accordance with state policy per ACR 260,
 - (B) make grammatical changes to accommodate amendments to the form,
 - (C) add a reference to "California Code of Regulations (CCR)" in the second bullet before "section 1399.515(a)(3)" to provide greater notice and avoid ambiguity for applicants; and,
 - (D) remove the old suite number in the Board's physical address (1100 to 2250 and add complete ZIP code) and website address (www.pac.ca.gov to www.pab.ca.gov) and update the form to include the current addresses in the third bullet, personal collection notice and footer of the form to ensure notice and timely receipt of all communications with applicants,
- (5) add an additional notice at the third bullet to emphasize the following: "Failure to provide any requested information or fees may prevent or significantly delay the processing of your request." Repetition of the consequences for not providing all requested information, including outstanding fees, helps in the Board's experience, ensure compliance and result in less application deficiencies; and,
- (6) amend the existing declaration to include the following statement: "By signing below, I am requesting Retired License Status." Certification under penalty of perjury helps to ensure that the documentation contains truthful, factual representations made in good faith. (See e.g., *In re Marriage of Reese & Guy* (1999) 73 Cal.App.4th 1214, 1223 [judicial explanation for the use of certifications].) The Board relies upon applicants' self-reported information in evaluating applications. Updating the declaration to include this added statement before signature helps avoid confusion regarding the purpose of this application and confirms the licensee's intention to seek a retired license status.

Underlying Data

Technical, theoretical or empirical studies, reports, or documents relied upon:

1. Agenda, Relevant Meeting Materials, and Minutes of the Physician Assistant Board's August 9, 2021 Board meeting.
2. Agenda, Relevant Meeting Materials, and Minutes of the Physician Assistant Board's April 21, 2025 Board meeting.
3. Agenda, Relevant Meeting Materials, and Minutes of the Physician Assistant Board's November 17, 2025 Board meeting.
4. California Department of Justice, Information Services Division's Information Bulletin entitled "Purpose, Use, and Security of Criminal Offender Record Information (CORI)", 19-04-CJIS, dated 05-30-19.

Business Impact

The Board has made an initial determination that the proposed regulatory action would have no statewide adverse economic impact directly affecting business, including the ability of California businesses to compete with businesses and other states. This initial determination is based on the following facts:

- The Board does not currently charge a fee to process a retired license application and this proposal would not change that policy decision. However, applicants who have been in retired status for more than five years and who are seeking a new, active license would pay the fees already required by Section 1399.506 to obtain a new license and to take and pass a new examination (PANRE) to re-establish minimum competency.
- The proposed regulation requires the retired licensee applicant whose original license expired more than five years prior to application for restoration to apply as a new applicant according to the authority in BPC section 3526.
- This proposal would therefore allow a licensee who has been in retired status for more than five years to obtain an active license by applying for a new license in accordance with CCR section 1399.506.
- This proposal includes a process for requiring fingerprinting to allow the Board to receive criminal offender record information (CORI) from the DOJ's database for an applicant if an electronic record of the submission of the individual's fingerprints does not exist in the DOJ's criminal offender database for the Board.

Economic Impact Assessment/Analysis:

The Board concludes that this regulatory proposal will have the following effects:

The Board has determined that this regulatory proposal will not create or eliminate jobs, will not create new business or eliminate existing businesses, and will not affect the expansion of businesses currently doing business within the State of California because the proposal is not of sufficient magnitude to create or eliminate jobs or businesses or affect the expansion of

businesses.

The Board has made this initial determination because this proposed regulation simply affords licensees already retired from working as a physician assistant, the opportunity to place a license in a retired status. Since licensees currently can choose retired status, there would be no effect on the workforce related to a change in license status nor an effect on new business or existing businesses or the expansion of businesses.

This regulatory proposal will benefit the health and welfare of California residents because this proposal would include a process for requiring fingerprinting to allow the Board to receive criminal offender record information (CORI) from the DOJ's database for an applicant if an electronic record of the submission of the individual's fingerprints does not exist in the DOJ's criminal offender identification database for the Board. This furthers the Board's consumer protection mandate by allowing a more effective background check to ensure no grounds for denial of the application to restore to active status exist and that an applicant is safe to return to active practice with the public.

Placing a five-year limitation on how long an individual can restore their license from retired status to active status and requiring a recertifying examination for those seeking active status after more than five years in retired status ensures currency of knowledge for those who re-enter practice after being retired for years. Updating the Board's requirements for obtaining a retired status or restoring a license to active status also helps alleviate confusion for licensees regarding the Board's requirements for acquiring both types of license statuses, thereby facilitating compliance and a simple process for retirement planning purposes.

This regulatory proposal will not affect worker safety or the state's environment because the proposal does not involve worker safety or the state's environment.

Individuals on retired license status for more than five years opting to restore to active status will be required to pay PANRE, fingerprint background check, application, and initial license fees. Additionally, other applicants may need to submit and pay fingerprint background check fees upon request.

The Board does not have an estimate of the number of retired status licensees that may opt to reactivate their license in the future and therefore does not have a total cost impact estimate at this time. However, the Board anticipates the number of individuals will be minimal.

The Board has identified fee costs (individuals) and revenues (business) as follows:

- PANRE: \$350
- Application: \$60
- Initial license: \$250
- Fingerprint Background Check: \$75
 - DOJ (\$32), FBI (\$17); Vendor (\$26)

Specific Technologies or Equipment:

This regulation does not mandate the use of specific technologies or equipment.

Consideration of Alternatives:

No reasonable alternative to the regulatory proposal would be either more effective in carrying out the purpose for which the action is proposed or would be as effective or less burdensome to affected private persons and equally effective in achieving the purposes of the regulation in a manner that ensures full compliance with the law being implemented or made specific.

No such alternatives have been proposed, however, the Board welcomes comments from the public.

Description of reasonable alternatives to the regulation that would lessen any adverse impact on small business:

No such alternatives have been proposed, however, the Board welcomes comments from the public.