

Comments from Nick De Rose, LSRP (President of the LSRPA)

April 20, 2011

The LSRPA would like to present a series of comments to expand on our comments in our April 11<sup>th</sup> letter to the board. The LSRPA greatly respects the work of the licensing board and the commitment and expertise of all who serve on the board. We also respect the importance of diverse perspectives that the board represents. So I ask you to keep an open mind as you continue your ongoing work in crafting a framework that will leave a long lasting imprint on this uniquely important licensing program for the state of New Jersey. In particular – reach out to the Mass. LSP licensing board, NJ PE licensing board and others to ensure that the roles and responsibilities of the board are consistent with the overall framework for the LSRP program established in the legislation.

- The LSRPA strongly encourages the licensing board to establish rules or policies with robust stakeholder input. We would like to engage in such a process to review our more detailed comment in our letter of April 18<sup>th</sup> regarding the LSRP audit questionnaire. We also recognize that short term policies or advisories may be necessary prior to establishing formal rules. For example, regarding ‘referrals of complaints’ LSRPA feels it would be necessary to establish rules and or, policies to ensure that the board can determine which complaints are appropriate to hear.
- The LSRPA supports the rigorous ‘front end’ licensing process adopted in the SRRA to establish a profession that the public can be confident in. Therefore the licensing board

should recognize this and avoid unnecessary burdens to the LSRP that has a satisfactory performance record with respect to the code of conduct.

- The LSRPA supports NJDEP conducting as many reviews as necessary to demonstrate that protection of human health and the environment is being accomplished through the completion of effective remedies – therefore the licensing board should avoid conducting unnecessary duplicative reviews of LSRP work product and rely on NJDEP’s findings when appropriate. The board audit should focus on the LSRP’s standing with respect to the code of conduct and licensing obligations.