

**RE: IMLCC - CALL FOR COMMENTS - IMLCC Proposed Rule 8 and 9**

1 message

**Jerry Landau, JD (FSMB)** <jlandau@fsmb.org>  
To: Marschall Smith <imlccexecutivedirector@imlcc.net>

Tue, Aug 27, 2019 at 9:59 PM

Marshall, please see my comments below.

Thanks

I support the draft, except as below

I would extend the immunity provision to termination.

I would not support a catch all for confidentiality. It allows the Executive Committee to enact a rule. Rulemaking is for the full commission.

Jerry G. Landau, JD

Treasurer, FSMB

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**From:** Marschall Smith <imlccexecutivedirector@imlcc.net>  
**Sent:** Monday, August 19, 2019 1:30 PM  
**To:** undisclosed recipients <imlccexecutivedirector@imlcc.net>  
**Cc:** Rick Masters <rmasters@csg.org>  
**Subject:** IMLCC - CALL FOR COMMENTS - IMLCC Proposed Rule 8 and 9

Dear Commissioners,

This "Call for Comments" is being provided in accordance with IMLCC Statute, Section 12(b) and IMLCC Rule, Chapter 1.

At its August 13, 2019 meeting, the Rules and Administrative Procedures Committee considered proposed IMLCC Rule, Chapter 8 and Chapter 9. It was the decision of the committee to advance consideration of these proposed rules for a rulemaking hearing at the November 19, 2019 Commission Meeting.

Attached please find 3 documents:

- IMLCC Rulemaking timeframe 8-2019, which outlines the steps to be followed when a rulemaking hearing is being scheduled.
- IMLCC Rule - Chapter 8 - Rule on Notice to Licensees Upon Withdrawal or Termination of Membership in the Compact
- IMLCC Rule - Chapter 9 - Rule on Exemption from Disclosure of Records

**The Call for Comment period for IMLCC Commissioners shall end at midnight (Eastern) on Friday, August 30, 2019.**

Comments must be provided via email to:

- [imlccexecutivedirector@imlcc.net](mailto:imlccexecutivedirector@imlcc.net)

The Rules and Administrative Procedures Committee is scheduled to meet on September 10, 2019 to consider the comments provided and to prepare draft rules for public comment. All comments received will be posted to the IMLCC webpage and provided to the committee members.

It is the intention of the Rules and Administrative Procedures Committee to finalize the proposed rules at its October 8, 2019 meeting so that a rulemaking hearing can take place at the November 19, 2019 Commissioner meeting.

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Marschall S. Smith

Executive Director

Interstate Medical Licensing Compact Commission

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