

**Deborah Jameson**

**Comments on:  
Disciplinary Regulation 500**

The new disciplinary regulations appear to be a major change from the old regulations. There is nothing in the meeting minutes that I could find explaining why the change was needed and what problems were to be addressed. It seems to be a radical overhaul with no explanation of the need for such changes.

It is nearly impossible to make useful comments on regulations when presented in parts. The definitions only come to have meaning when the process is fully described. It seems that the Board's best course of action would be to reserve final approval until the entire disciplinary regulations have been published and commented upon.

One specific comment: Proposed Reg 501.4 sets out definitions. Many of these definitions already exist in Reg 002. Some of the words defined in Reg 002 are defined differently or more expansively in proposed Reg 501.4. It is unclear whether the Board intended to change Reg 002 or eliminate the definitions from Reg 002 at some future date. To the extent the Board is proposing these changes that will affect Reg 002, the Board is not following the procedures outlined in Reg 602 of giving notice of changes to Reg 002. The Board has failed to give notice of the changes and allowed time for public comment.

It is unfortunate to have a discussion and vote on such a major change to the regulations in a phone conference meeting where participation by the public is almost impossible. It seems contrary to Reg 601, "The intent of the...Board is to give notice and the opportunity for public comment whenever the Board intends to adopt, amend, or repeal its regulations...." The Board values transparency and openness, but the process used to create these new regulations and to adopt them has been neither open nor transparent.