

OSBGE Rulemaking – Military Portability/Temporary Military Spouse Registration, Criminal Conviction Determinations, and Fees

Public Comments Record

#	Date	Source	Name	Comments	Board Response
1	08/04/2025	Email	Edward Jonathan Reeve, G2638	<p>As an RG in Oregon, I received the rulemaking notice for 809-050-0025 and read through the proposed rule change. The requirements seem onerous and costly for those already at a great disadvantage in life. The scenario I envisioned was an aspiring student with a string of 5 shoplifting convictions from their teenage years. The individual would have to painstakingly document each conviction individually with the many detailed records required in the proposal, lest it be dropped for incompleteness, and then pay \$1,000 to the board when they can least afford it as a freshman in college in order to arrive at a determination. And then that determination can be rescinded years later anyways. I believe it is for the courts to mete out punishment to criminals, and once they have paid their dues to society that should be the end of it. While I understand that the board should have a special concern and vigilance</p>	<p>The new rule and the proposed amendment to the fee rule could be read as being at odds. This was an inadvertent drafting issue. The Board decided to amend the petition rule at 809-050-0025 (3) to clarify that a single petition fee covers multiple criminal convictions if all disclosed in the petition filing.</p> <p>The cost for a petition review could be very expensive for an individual who has multiple past convictions if the Board charged the petition fee by conviction. There could then be a financial barrier to an individual requesting a petition review. To avoid discouraging those with prior criminal convictions from considering a future geology career, the Board decided to clarify that it has a flat fee for a petition.</p> <p>The fee as proposed in the fee rule aligns with the fee for an application for RG registration, the review of which can include a similar consideration of</p>

				<p>for crimes adjacent to the profession, for the most part the substance of this proposal feels like adding barriers to reintegration, and as a result is more likely to increase recidivism and racial inequity than it is to protect the reputation of registered geologists in Oregon. I urge the OSBGE to reconsider the details of this proposal, going through some test scenarios to better fit the requirements to the risks. At the least, I urge the board to consider the \$200 cost as a flat fee per application, rather than per conviction.</p>	<p>past criminal convictions. Experience to date with review of applications for registration has not shown that this fee needs to be higher. However, the Board may revisit the fee amount if experience with petitions shows that the fee is not sufficient to cover the review cost. This would be done via a future amendment to the fee rule after completing a public rulemaking process.</p>
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