

**From:** [Pinheiro, Lisa](#)  
**To:** [Lynn Frank](#)  
**Cc:** [Rep Bailey](#); [Longacre Julia](#); [Sen Burdick](#)  
**Subject:** RE: BETC Amendments  
**Date:** Wednesday, June 15, 2011 3:16:45 PM

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Lynn,

ODOE has talked about this and we feel that irrespective of the time period until the law becomes effective, ODOE can begin discussions with industry stakeholders, legislators, and others in preparation of and in drafting administrative rules. Obviously, we cannot adopt or file emergency temporary or permanent rules until the law becomes effective, but we can do the necessary work, discussions and thinking up to that date.

I hope this helps.

Lisa P.

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**From:** Lynn Frank [mailto:[lynn.frank@fivestarsintl.com](mailto:lynn.frank@fivestarsintl.com)]  
**Sent:** Friday, June 10, 2011 6:40 PM  
**To:** Pinheiro, Lisa  
**Cc:** LONGACRE Julia; REP Bailey; [sen.ginnyburdick@state.or.us](mailto:sen.ginnyburdick@state.or.us)  
**Subject:** BETC Amendments

One critical issue that is perhaps not understood by the members is how long it would take for ODOE to set up a successor program. A member observed that a transition would be seamless even if it were to occur July 1, 2011. In practice, that is unlikely and the unintended consequences of an eight to ten month hiatus could be devastating to small Oregon businesses.

Given the lead time needed for administrative rules and related forms and processes to be adopted, my perception is that such transitions may take eight to ten months. The rules implementing 2007 BETC changes for example were adopted in May or June 2008 as I recall. If the effect then is to close one program and await a new one an eight to ten month hiatus could be devastating for small businesses.

If you have the opportunity could you please clarify the lead time for successor programs and whether and how continuity would be achieved?

Thanks so much.

Lynn

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