

Louisiana Real Estate Commission  
State of Louisiana  
Office of the Governor

JEFF LANDRY  
GOVERNOR



TAYLOR F. BARRAS  
COMMISSIONER OF ADMINISTRATION

**To:** Attorney General Liz Murrill  
Attn: Department of Justice, Occupational Licensing Review Program

**From:** LOUISIANA REAL ESTATE COMMISSION  
Mr. Thomas E. Devillier, Executive Counsel / Deputy Director

**Date:** June 10, 2026

**Subject: Rule Submission Form;** Request for review of proposed rules promulgation initiated in compliance with Governor Landry's April 1, 2025, *Executive Order Number 25-038*.

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The Louisiana Real Estate Commission ("LREC" / "Commission") has proposed to amend its administrative rules (LAC 46:LXVII.101 *et seq*) in consideration of La. R.S. 49:964(D) and 966(K) and Governor Landry's April 1, 2025, *Executive Order Number 25-038*. During open meetings conducted on August 21, 2025, October 16, 2025, November 19, 2025, February 18, 2026, and March 19, 2026 (<https://lrec.gov/meeting-agendas>), the Commission reviewed 100 percent of its current administrative rules and the proposed rules and resolved that the proposed rules are necessary, consistent with applicable law, and aligned with its mission and that the benefits of the proposed changes outweigh any potential burdens or costs.

On December 22, 2025, the Commission reported to the Office of the Governor and the appropriate members of the Louisiana Legislature in compliance with *Executive Order Number 25-038*.<sup>1</sup> On April 10, 2026, the Legislative Fiscal Office approved the Commission's *Fiscal and Economic Impact Statement*.<sup>2</sup> On April 20, 2026, the Louisiana Register published LREC's *Notice of Intent* to initiate rulemaking.<sup>3</sup>

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<sup>1</sup> Exhibit A1 - December 22, 2025, *Executive Order Number 25-038, Compliance Reporting*; Ex. A2 - March 19, 2026, *Resolution 2026-001*.

<sup>2</sup> Ex. B - April 10, 2026, *Fiscal and Economic Impact Statement* (Legislative Fiscal Office Approved).

<sup>3</sup> Ex. C1 - January 20, 2026, *Notice of Intent* (Publication); Ex. C2 - Notice of Intent ("Redline"); Ex. C3-C4 - March 27, 2026 and April 8, 2026, deliveries of the initial *Notice of Intent Report* to the Office of the Governor and the Louisiana Legislature.

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To facilitate the Department of Justice’s review of the proposed rule, the Commission provides answers to the following questions:

**1. Describe any relevant factual / procedural background to the occupational regulation and the purpose of the occupational regulation.**

The Commission reviewed 100% of its rules and seeks to reduce its total regulations in both number and overall length in consideration of existing applicable law and Governor Landry’s April 1, 2025, *Executive Order Number 25-038*.

**2. Is the occupational regulation within the scope of the occupational licensing board’s general authority to regulate in a given occupation or industry? If so, identify the law that provides the authority for the rule and describe how the occupational regulation is within the scope.**

LREC is authorized to promulgate these rules in accordance with the Administrative Procedure Act (La. R.S. 49:950 *et seq*) and the Louisiana Real Estate License Law (La. R.S. 37:1430 *et seq*). The proposed amendments are within the scope of the Commission’s authority to protect the public interest by reasonably regulating real estate licensees.

**3. Check all of the following that apply as reasons the occupational regulation is subject to review:**

- Creates a barrier to market competition
- Fixes prices, limits price competition, or results in high prices for a product or service provided by or to a license holder
- Reduces competition or excludes present or potential competitors from the occupation regulated by the board
- Limits output or supply in this state of any good or service provided by the members of the regulated occupation
- Reduces the number of providers that can serve a particular set of customers
- Changes existing requirements for licensure, certification, registration, etc.
- Other activity (please describe)**

The Commission is requesting OLRP review of the proposed rule amendments due to the comprehensive nature of reviewing and revising nearly 100% of the agency’s total regulations.

**4. Identify the clearly articulated state policy (e.g., health, safety, welfare, or consumer protection) in state statute, or any supporting evidence of the harm the action/proposed action is intended to protect against?**

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The Commission is authorized by multiple statutes to protect the public health, interest, and welfare to protect Louisiana citizens, their residences, and other property by reasonably regulating the licensure of persons performing real estate activity, including but not limited to La. R.S. 37:1435. Generally, the Commission seeks to decrease its total regulations in both number and overall length to reduce any potential or related burden and cost.

**5. Do any less restrictive alternatives to the occupational regulation exist for addressing the same harm? If so, include a comparison of the occupational regulation to the alternatives and a justification for not pursuing a less restrictive alternative. If no less restrictive alternatives exist, explain why.**

No. The Commission is unaware of any less restrictive alternatives to the proposed amendments. Most of the proposed amendments make only technical changes or otherwise repeal or reduce current rules that are duplicative of existing statutes or other rules.

**6. Describe the process that the occupational licensing board followed in developing the proposed rule, including any public hearings held, studies conducted, and data collected or analyzed.**

During open meetings conducted on August 21, 2025, October 16, 2025, November 19, 2025, February 18, 2026, and March 19, 2026, the Commission reviewed 100 percent of its current rules and the proposed amendments prior to submitting its *Notice of Intent* for publication on April 20, 2026.

The Commission accepted public comments through May 20, 2026 and held a public hearing on May 28, 2026, in part, to consider any public comments received. The Commission did not receive any related public comments either in advance of or during the May 28, 2026 hearing.<sup>4</sup>

**7. Does the occupational regulation relate to a matter on which there is pending litigation or a final court order?**

No, there is no known, pending litigation or final court order that relates to any of the proposed rules changes.

**8. Please identify the board members voting in favor of this rule, and state whether the member is an active market participant.**

All LREC members present at the March 19, 2026 meeting unanimously voted to promulgate the proposed amendments, and all such members are active market participants. *See Exhibit A2, page 2 - March 19, 2026, Resolution 2026-001.*

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<sup>4</sup> Ex. D1 - May 28, 2026, *Meeting Agenda* (Public Comments Hearing).

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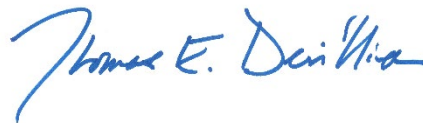
**9. Is there anything else that the occupational licensing board would like the Department to know about the proposed rule?**

N/A

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Thank you for your time and consideration of the Commission's proposed rule amendments. Please let me know if you need additional information.

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