



Final Regulation Agency Background Document

Agency name	Board for Contractors
Virginia Administrative Code (VAC) citation	18 VAC 50-30
Regulation title	Board for Contractor Individual License and Certification Regulations
Action title	Regulatory Reform
Date this document prepared	December 20, 2013

This information is required for executive branch review and the Virginia Registrar of Regulations, pursuant to the Virginia Administrative Process Act (APA), Executive Orders 14 (2010) and 58 (1999), and the *Virginia Register Form, Style, and Procedure Manual*.

Brief summary

Please provide a brief summary (no more than 2 short paragraphs) of the proposed new regulation, proposed amendments to the existing regulation, or the regulation proposed to be repealed. Alert the reader to all substantive matters or changes. If applicable, generally describe the existing regulation. Also, please include a brief description of changes to the regulation from publication of the proposed regulation to the final regulation.

The Board seeks to amend its current regulations to extend the reinstatement period from one to two years.

Statement of final agency action

Please provide a statement of the final action taken by the agency including (1) the date the action was taken, (2) the name of the agency or board taking the action, and (3) the title of the regulation.

At its meeting of December 17, 2013, The Board for Contractors adopted as final these regulations that amend the Board for Contractors Individual License and Certification Regulations (18 VAC 50-30).

Legal basis

Please identify the state and/or federal legal authority to promulgate this proposed regulation, including (1) the most relevant citations to the Code of Virginia or General Assembly chapter number(s), if applicable, and (2) promulgating entity, i.e., agency, board, or person. Your citation should include a specific provision authorizing the promulgating entity to regulate this specific subject or program, as well as a reference to the agency/board/person's overall regulatory authority.

Section 54.1-1102 of the Code of Virginia provides the authority for the Board to promulgate regulations for the licensure of contractors in the Commonwealth. The content of the regulations is pursuant to the Board's discretion, but shall not be in conflict with the purposes of the statutory authority.

Purpose

Please explain the need for the new or amended regulation. Describe the rationale or justification of the proposed regulatory action. Detail the specific reasons it is essential to protect the health, safety or welfare of citizens. Discuss the goals of the proposal and the problems the proposal is intended to solve.

The Board for Contractors, along with other regulatory boards, was tasked by the Governor to review its regulations to determine if any provisions could be identified as obsolete, unnecessary, or overly burdensome and subsequently eliminated. The Board identified two current provisions of the regulations that may be identified as a burden to its licensees with no measurable level of protection to the health, safety and welfare of the general public.

Substance

Please identify and explain the new substantive provisions, the substantive changes to existing sections, or both where appropriate. A more detailed discussion is required under the "All changes made in this regulatory action" section.

Section 18 VAC 50-30-130 E of the regulations currently prohibits the reinstatement of a license once more than one year has passed since the expiration date. The proposed amendments will extend the reinstatement period from one year to two years after expiration.

Issues

Please identify the issues associated with the proposed regulatory action, including:

- 1) the primary advantages and disadvantages to the public, such as individual private citizens or businesses, of implementing the new or amended provisions;*
- 2) the primary advantages and disadvantages to the agency or the Commonwealth; and*
- 3) other pertinent matters of interest to the regulated community, government officials, and the public.*

If there are no disadvantages to the public or the Commonwealth, please indicate.

- 1) In addition to the less burdensome renewal criteria for the licensees, these amendments would allow the licensing staff of the Board for Contractors to have more resources available for the processing of new applications. The licensing staff has one staff member currently spending approximately 1500 hours per year processing education rosters and school submissions. Additionally, call center staff spends approximately 2000 hours per year answering telephone calls from licensees involving continuing education issues.
- 2) There are no other pertinent matters of interest to the regulated community, government officials, and the public.

Changes made since the proposed stage

Please describe all changes made to the text of the proposed regulation since the publication of the proposed stage. For the Registrar’s office, please put an asterisk next to any substantive changes.

The Board for Contractors removed the proposed amendment that would eliminate the requirement that tradesman complete continuing education as a prerequisite for renewal/reinstatement. This requirement will remain in the regulations.

Although the Board determined, through a legislative study required by HB 1645 (2013), that there was no documented value to continuing education, overwhelming public comment against the proposed amendment was given a significant amount of weight.

Public comment

Please summarize all comments received during the public comment period following the publication of the proposed stage, and provide the agency response. If no comment was received, please so indicate.

Commenter	Comment	Agency response
Paul Abernathy, National Electrical Manufacturers Association, Education Provider	Codes are vital to learn as a tradesman. Codes are changing rapidly. During each cycle, over 2000 proposals get submitted for the National Electrical Code. Many get accepted. Inspector’s time is limited and they spend much of that time having to be teachers. Was one of the first continuing education providers in Virginia? How do we ensure contractors understand changes to the code if we don’t have continuing education requirements? Represents 11 states that all have continuing education and some require 14 or 21 hours. Strongly opposes this regulation that would remove continuing education.	After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.
Robert Adkins	Requiring continuing education for licensed tradesman is critical to keeping the industry up to date on code requirements. Not keeping current on code changes can cause unnecessary re-inspections that are not fair to the owner and puts a burden on code administrators that are shorthanded as well as DPOR. Suggests that the	After reviewing all public comment received on these regulations, the Board has adopted amended

	<p>continuing education program be changed, not eliminated, by making licenses renew every 3 years instead of 2.</p>	<p>regulations that leave the continuing education requirements for tradesman in place.</p>
<p>Bill Aldridge, Virginia Plumbing & Mechanical Inspectors, Contractor, Tradesman, Inspector</p>	<p>Thanked everyone who attended the Roanoke public hearing.</p> <p>Concerned that continuing education is, in many cases, the only opportunity a tradesman might have to be able to keep up with the constantly changing building code requirements. The cost of continuing education to tradesman is an overhead expense of doing business. States that a tradesman's financial income could become jeopardized if they were not able to compete for jobs due to a lack of knowledge through continuing education. Does not think that there would be any cost savings to tradesman if continuing education were eliminated. Wants to know where the passion for continuing education has gone since the Town Hall document was submitted in 2006 the resulted in the addition of continuing education. States that the Town Hall document submitted in 2013 to propose the elimination continuing education contradicts the 2006 document. Doesn't understand why the Board for Contractors isn't looking into eliminating continuing education for elevator mechanics. States that it would be doing the public a severe injustice to eliminate the requirement for continuing education. This need is compared to the need of a heart surgeon to maintain their continuing education.</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>
<p>Rocco Alvaro, Fairfax County Fire and Rescue Department, Fire Marshal's Office, Fire Inspection Section</p>	<p>Fairfax Count is asking DPOR to not approve the proposed changes that will eliminate continuing education for tradesman. The Board for Contractors stated in 2005 "The purpose of continuing education was to provide a mechanism for tradesman to remain current with ever-changing codes." He wants that now. On average, codes change as often as every 18 months. Continuing education is an obligation to tradesman and is commonly viewed by local licensed construction professionals as an important avenue to ensure that they can remain competitive. The public benefits from continuing education by having a tradesman who has a great probability for providing improved job performance and less potential for liability. Encourages the Board to change their focus from eliminating continuing education to one of delivering quality continuing education by encouraging a forum that would improve, strengthen and enhance continuing education for tradesman.</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>
<p>Amy, Jade Learning</p>	<p>Does not want the elimination of continuing education. States that 3 hours of continuing education every other year does not seem burdensome for licensees. Electrical continuing education improves safety and lives of electricians.</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing</p>

		education requirements for tradesman in place.
Sharon Angie, Planning and Inspections	Continuing education is critical for the safety of structures and the individuals who inhabit them. Does not think tradesman will take it if not required. Ongoing training is essential.	After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.
Joel Baker, Building Commissioner for the County of Roanoke, Tradesman, Education Provider	Has trained over 3500 tradesman since the program began and hasn't had any complaints except that they may have had to take the same class that they took the last time. Nobody's providing them training if we don't and then it becomes the inspectors' role. Presented a document with 414 digital signatures that agree with this statement "I support the VBCOA and VPMA position to maintain and improve the continuing education requirements for tradesmen and individual license holders." In addition to the digital signatures, 91 comments were submitted also in agreement with that statement. The Code is not static and it changes quite a bit. Learning by trial-and-error is a very expensive way of learning the code. Supports changing to a 3 year cycle from a 2 year cycle. Would support any kind of opportunity to open training to any subject that would be pertinent to the tradesman.	After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.
David Ballentine, Associated Builders & Contractors	3 hours of continuing education is minimal compared to other occupations that require continuing education such as barbers and hairdressers. Spoken with many tradesmen that see no need to get a license because it is not enforced. Oklahoma requires every electrician to have a license. People that suffer are those who have systems installed by unqualified tradesmen. Making the license worth something will help the trade. Compares an unlicensed electrician with the supervisor miles away to an unlicensed doctor performing services.	After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.
Jack Bartell, Virginia Air Distributors	Provides training opportunities to all contractors in the state because they believe educated contractors are better prepared to install equipment that meets the current code, which provides a safer environment for consumers. Supports the governor's goal of reducing costs at department levels, but believes that eliminating the CEU requirement will come at the cost of putting the general public at a greater risk. Urges the state to not only continue the CEU requirement but to strengthen it. Also represents the Air-Conditioning Contractors of America (ACCA), North American Technician Excellence (NATE), and Refrigeration Service Engineer Society (RSCS). All of these organizations are in agreement that it is not the right thing to eliminate continuing education.	After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.

<p>David Beahm, Building Official, VBCOA Region III, Contractor</p>	<p>Localities get many complaints from tradesman. They are given code backing and are directed to DPOR, but they do not want to go outside of the locality for assistance. That may explain why the Board is seeing less complaints. These complaints have gone down drastically recently and have gone from code related complaints to cosmetic complaints. Believes continuing education has contributed to this and if removed, will increase. Hopefully the continuing education requirement will stay in effect to hopefully get the bad weeds out of the market so the customers don't have to deal with individuals that are not properly trained. Failed instructions delay construction. Architects and engineers are still required to have continuing education. Feels that contractors should also have continuing education in addition to the tradesmen. Hopes the Board decides not to pursue the elimination.</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>
<p>Jason Biniasz, International Brotherhood of Electrical Workers</p>	<p>Feels it would be a mistake to remove continuing educations. Instead the amount of continuing education required should be increased.</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>
<p>Ron Bladen, Virginia Plumbing and Mechanical Inspectors Association, Tradesman</p>	<p>Disapproves of the removal of continuing education. We are duty bound to protect the safety and well-being of the residents of the Commonwealth.</p> <p>Taking away something that they just put in just a few years ago makes no sense. Asks if money is going to be the real bottom line on making this decision? VPMIA and VBCOA are waiting to work with anybody then need to, to make sure that the continuing education program continues and that they provide the best continuing education possible.</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>
<p>Stephen Blankenship, Ennis Electric, Tradesman</p>	<p>Opposed to removing the continuing education requirement. Opposed to removing the requirement that continuing education providers are approved by the Board. It's important to the integrity of our license and to the safety of our state. 3 hours isn't enough. It should be double or triple that. Code changes are an overwhelming amount of information to keep up with. We have to keep up with technology changes. Asks why would anybody make this proposal?</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>
<p>Amy Bonilla, Jade Learning</p>	<p>Thinks that continuing education equals learning and helps keep tradesman educated and knowledgeable. It's also about safety. 90.1 of the NEC states: "the purpose of this code is the practical safeguarding of persons and property from hazards arising from the use of electricity." The code is updated every 3 years. 35 other states require electrical</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended</p>

	<p>continuing education. Jade Learning's 3 hour course is \$45 which equates to about \$22.50 a year. Courses are available online and the NEC is now available online. The average state requires 6 hours a year of continuing education and Virginia only requires 3 hours every other year. Recommends keeping continuing education for electricians and keep the requirement under 8 hours so it's not overly burdensome. Changing the requirement to every 3 years could help. Suggests allowing course on violations or citations to also count. Education providers should be regulated to ensure the quality of the education. Recommends improving on-line providers.</p>	<p>regulations that leave the continuing education requirements for tradesman in place.</p>
<p>Stephen Borders, Virginia Plumbing and Mechanical Inspectors Association</p>	<p>Requests DPOR to reconsider eliminating the continuing education requirement because it is the very backbone of the profession. Feels that Virginia has been a leader in Code enforcement and the current requirements are not stringent and the cost is not prohibitive.</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>
<p>Pete Bowers, Tradesmen, Inspector</p>	<p>The importance of understanding the code is significant. The code has changed drastically and new sections added. Asks where would electricians go to get this information if they don't go to school? It's not difficult and it can be taken online. You're dealing with life safety, property damage and a whole lot of other things. Eliminating continuing education is a mistake. It took long enough and hard enough to get it put in place. "Electrical inspectors are being driven nuts by going out and turning them suckers down."</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>
<p>Chris Bridges, Building Official for the City of Martinsville, VBCOA</p>	<p>Concerned about the elimination of continuing education. Continuing education has no impediment to business in Virginia. Asks why Virginia would want to mirror North Carolina, who has a falling Institute for Building and Home Safety rating, and eliminate continuing education? Compared contractors learning from failing inspections to the public learning what speed to drive by taking down all of the speed limit signs and getting tickets. One problem of the program is the failure to manage the program effectively and responsibly. The International Code Council has 51,000 individuals that maintain 158,000 certifications. There are significant continuing education requirements and they do it with ease. VBCOA does not rely on any kind of funding from training therefore eliminating continuing education would not adversely affect that agency. Time spent with building officials should be able to count as continuing education.</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>
<p>Joseph Brinley, Tradesman</p>	<p>"Unless you force somebody to keep up with the Code, they're not going to keep up with it. They're lazy." Thinks continuing education is a good thing and doesn't think it should be done away with. Thinks the licensing requirement</p>	<p>After reviewing all public comment received on these regulations, the</p>

	<p>should be enforced. No one has ever asked to see his license, but keeps it up anyways. Wants somebody out there checking for licenses to make sure they're licensed. Get rid of the loophole about working underneath somebody without a license unless they're an apprentice. West Virginia has a license for apprentices.</p>	<p>Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>
<p>Jason Brown, Patrick County Building Official</p>	<p>Opposed to the elimination of the continuing education requirements. It has benefited the contractors, homeowners and the building inspectors to the extent that will never be able to be gauged. Suggests modifications to the current continuing education program. 1) Required every 3 years instead of 2. 2) Required to be taken within one year of the adoption of the new code. 3) Offered online at a minimum cost.</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>
<p>Curt Campbell, Virginia Plumbing and Mechanical Inspectors Association, Tradesman, Building Supervisor for Chesterfield County</p>	<p>Since the requirement by DPOR for tradesman to take continuing education started, there has been a decline in the number of inspection turn downs. This is a benefit to homeowners and contractors by eliminating the cost or re-inspection fees.</p> <p>Eliminating continuing education for tradesman would be a burden on contractors. Would like the Board to reconsider the proposal to eliminate the required continuing education program. A home owner would only feel safe if an educated contractor does work on their home.</p> <p>Staying abreast of the latest products that could be used could reduce the cost of building homes and commercial buildings.</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>
<p>Tom Coghill, Virginia Building and Code Officials Association Region VIII</p>	<p>Suggests that the Board reconsider eliminating code update education and perhaps increase the amount of education required. Building Officials have seen a significant improvement in code compliance in their region. Concerned about the quality of work if the requirement is rescinded.</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>
<p>Cathy Cook, Building Official for the Town of Blacksburg, VBCOA</p>	<p>Against the getting rid of continuing education for tradesman and contractors. It's important that these folks are trained. They are in people's homes and schools and need to know what they are doing. Asks the Board to really look at this closely and not get rid of this requirement. VBCOA would like to work with the Board to create a training program that works for everybody.</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>

<p>Laurie Crigler, Plumbing and Mechanical Professionals of Virginia</p>	<p>Hopes the full Board will be able to read every public comment in its entirety and not just a summary.</p> <p>Disappointed in the facts that were presented to the Board at the NOIRA phase. Disputes the facts on the DPOR Continuing Education Fact sheet. 2007 began the recession that could explain the reduction in the amount of tradesman. Elevator and water well drillers require continuing education per the statutes, so even if the continuing education is eliminated for tradesman, staff will still be needed to manage the program. North Carolina's elimination of their CE program is not pertinent to Virginia because the programs are very different. Argues that tradesman can take cheaper courses and complete courses online which would cut down on traveling costs so there isn't a large economic impact.</p> <p>Was with the group that helped push to get the continuing education program put into place and it took many years. Feels that nothing has changed and the arguments that were used in 2006 are still valid. Agrees that the current program has room for improvement. Asks the Board to let the industry voluntarily help the Board design a program that will be effective. Believes the renewal cycle should be changes to be every 3 years instead of 2. Eliminating continuing education jeopardizes the safety of the citizens.</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>
<p>Robby Dawson, Fire Marshall in Chesterfield County, Virginia Fire Prevention Association</p>	<p>1) Proposes there are some issues with the staff analysis on the cost impact of continuing education. It's the economy that has driven the construction industry nearly out of business, not continuing education.</p> <p>2) Fire fighters want assurance that the building they're running into was constructed appropriately. Firefighters and paramedics are required to complete over 48 hours of training every other year and thinks it's reasonable to require those who build them to have some degree of training on the codes.</p> <p>3) Most consumers will hire a contractor, look at the license, and assume they're licensed and are brought up to speed on current technologies.</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>
<p>Cynthia Easterling, Homeowner</p>	<p>Concerned about the elimination of continuing education. Wants to ensure that tradesmen are qualified to do the work they've been hired for and does not want the aggravation of failed inspections. Continuing education should be required for anyone who makes his living working in the building trade.</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>
<p>Paula Eubank, Code Official</p>	<p>The primary issue with continuing education is poor governmental program management. Suggests that we offer smarter, more flexible and more effective continuing education instead of abolishing the program. Suggests modeling successful programs ran by DHCD and VDFFP.</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted</p>

	Continuing education should not be restricted to code editions and code changes, but should allow other pertinent subject matters.	amended regulations that leave the continuing education requirements for tradesman in place.
David Feiring, Fairfax County Fire Prevention Division	Opposed to reducing any requirement for continuing education. The primary purpose of the Fire Prevention Division is to save life and property. We should only have the best, most-qualified, and current-training people to come out and work in the field. The safety of our citizens is dependent upon it.	After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.
Michael Fitz, International Brotherhood of Electrical Workers	Discontinuing continuing education will allow electricians to stay in the field that are not staying current on new regulations and methods.	After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.
Shawn Fleek, International Brotherhood of Electrical Workers Local Union 666	Tradesman need to be informed on changes to materials used and installation methods for proper and safe installations for both the electricians and the customers.	After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.
Joe Fortney, Tradesman	He took his first continuing education 8 years ago and was thoroughly impressed. "It's put everything on a level playing field. " After every class he's taken, he's walked away and felt like it was time well spent. Enjoyed it and believed in it so much, he became an instructor. The credibility and professionalism that the homeowners and business owners gets from that particular individual is well worth any class. Has not met anyone that has taken his class that has strongly opposed it. Suggest limiting the class to when the code changes.	After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.
John Fulton, E McLauchlan & Sons, Tradesman and Contractor	Repealing continuing education would be a big step backwards.	After reviewing all public comment received on these regulations, the Board has adopted

		amended regulations that leave the continuing education requirements for tradesman in place.
Michael Frizell, Master HVAC	In support of the removal of the continuing education requirement. Has found these courses to be of no use in enhancing his knowledge in his trade. Thinks it is a poor use of time and funds.	After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.
Alan Givens, Parrish Services	Is using this time to go over some things he found disturbing from other hearings. He understands that this is a cost issue, but there have been proposals to make it revenue-positive. "It's more to do with Mr. Olson wanting to lessen his workload and the well drillers wanting to rid of continuing education for tradesmen." In the past week, he's come across 3 major failures in Fairfax County. There was a case in Colorado where a contractor and building inspector were charged with felonies due to a family dying of carbon monoxide poisoning. The amount of continuing education hours required should be tripled and applied to every tradesman, licensed or unlicensed. Apparently public money was used to bring in a person from North Carolina to talk to the Board about what a horrible idea continuing education was in North Carolina. No money was spent to try and solicit people from states with excellent programs. Thinks "the Board for Contractors should be absolutely ashamed of their actions. I hope the governor's got the common sense to turn this away and throw it in the trashcan."	After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.
Lorrie Gore, Gundach Plumbing & Heating Company, Tradesman, Contractor	It was a proud moment for us as professionals when continuing education was implemented in 2007. Rebuts the economic impact statement submitted by Board staff that reports that tradesman usually maintain more than one designation and it likely adds at least \$400 plus cost and possible travel expenses to the \$90 renewal fee. She paid \$105 to renew her 3 designations, it was done on-line. Against getting rid of continuing education for tradesman.	After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.
Robert Gregory, Tradesman	Concerned that the continuing education requirement will go away because the Code is adopted every 3 years and those changes are life safety issues. Tradesmen need to know what those changes are. Classes are also an opportunity for tradesman to share information.	After reviewing all public comment received on these regulations, the Board has adopted amended regulations that

		leave the continuing education requirements for tradesman in place.
Donny Groh, International Union of Elevator Constructors, Elevator Mechanic	When tradesmen don't know the codes, things can get put in improper and can be done wrong. This can have a very adverse effect on our safety and have an environmental impact. Doesn't feel that 3 hours is enough continuing education for tradesman. Issues still happen with the current requirements and will only get worse if the requirement is removed. Doesn't understand the financial impact being talked about when there's 5 million dollars more in revenue than expenditures. Fully supports keeping the continuing education.	After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.
Larry Hall, Contractor	Would like a class that can provide 8 hours of quality education in one day or get rid of it. Classes should be in convenient location and should be given by people skilled to teach the class.	After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.
Edith Hampton for the County of "Pualski", Building Official	Continuing education is one of the best ideas that DPOR has enforced. It is important for the health, safety, and general welfare of the public and has been successful. Eliminating continuing education would be a big setback for all citizens.	After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.
Scott Harding, FB Harding Electrical Contractors, Tradesman, Education Provider	Hundreds of electricians have taken his class and can assure you that from the perspective of an instructor, continuing education is truly necessary. Tradesman would send other people to take the class even if it wasn't a requirement for them. We all need to keep up on the trade, to understand what's changed, but sometimes just refreshers on the basics. Against having continuing education eliminated and against an approval process being eliminated as well.	After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.
Kenneth Hart, Dynalectric Company, Former Board Member of the Board for Contractors	36 other states have continuing education requirements that go from 8 hours to 40 hours. In most locales where an inspector is the only thing between a homeowner and the contractor. That's a lot of responsibility. There are multiple code changes every 2 years. The technology world is constantly edging up on us. Generally the Board protects the homeowner. Now they may have to pay more money on	After reviewing all public comment received on these regulations, the Board has adopted amended regulations that

	<p>a 3rd party type system. If we don't have a requirement to be aware and we don't have a requirement to understand how to install, we're going to really get ourselves in a real challenging condition. He was on the board for 6 years with the Board for Contractors. Always wondered how things could be done better than offering the recovery fund to consumers. Believes if we better educate, we're going to have a better group of contractors. Agrees that this continuing education system is costly from the state's perspective, but it's a small price to pay to keep the contractors educated.</p>	<p>leave the continuing education requirements for tradesman in place.</p>
<p>George Hollinsworth, Captain with the Fairfax County Fire and Rescue, Virginia Fire Prevention Association</p>	<p>Speaking against discontinuing the continuing education requirement for tradesmen. Inspectors are required to have continuing education yearly as the code changes. Multiple inspections waste time when compliance with the code isn't done from the beginning. It's a life safety issue. Offers assistance to the Board to continue the program.</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>
<p>Mary Huffman, Virginia Building and Code Officials Association, Certified Permit Technician</p>	<p>If continuing education is not required, not everyone will care enough to go and pay for classes to keep up to date. Tradesman deal with serious stuff in their line of work and this is a public safety issue. VBCOA is willing to offer good, quality and affordable training. Feels that continuing education is helping to protect the public is a minimum requirement.</p> <p>Feels it's her job to help protect the citizens of Virginia and feels this issue is one way to help protect that. Against eliminating continuing education. Has seen a humongous change since the implementation of continuing education. It makes sense to change the renewal cycle to 3 years. Changes to the Energy Code are going to be a huge issue. It's a huge safety issue.</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>
<p>Michael Hurt, Long's Corporation, Education Provider</p>	<p>Extremely opposes eliminating continuing education. The purpose of continuing education is to stop the cases at the inspector level, so that they never reach the Board. This may be why there has been no change in adjudicated cases that went before the Board.</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>
<p>Shetal Kapoor, Land Development Services for Fairfax County</p>	<p>There is an expectation from homeowners that when they hire a contractor, they are getting someone that is required to pass an exam and they are required to take continuing education to keep up to date. The current regulations create credibility, reliability and provides peace of mind to the public. An uneducated tradesman that only has to pass an initial exam would cause delays because they will fail</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that</p>

	<p>inspections that will cost the owners additional money. She read Section 102.1 of the USBC and believes cutting continuing education is contradictory to this code section. You cannot sit back and give them a license and expect them to train themselves.</p>	<p>leave the continuing education requirements for tradesman in place.</p>
<p>Robert Kirby, Professional Engineer, Contractor, Tradesman, Former Board Chairman for the Board for Contractors, Education Provider</p>	<p>Supports the proposed changes to eliminate the requirement of continuing education for 4 reasons.</p> <p>1) He did not support the addition of continuing education when he was on the board until it was specified it was for code changes only. Education is required every 2 years even though the code has only changed twice since the requirement started.</p> <p>2) Code changes will be very minor and mostly administrative going forward. As an education provider it is difficult to develop a 1 or 3 hour course based on the code changes.</p> <p>3) Is confident that the Board for Contractors has maintained records of any increase or decrease in Tradesman complaints. Recollects that while on the Board, the majority of complaints were about financial, criminal or ethical issues. Complaints for Code issues were rare. Questions the value to the citizens.</p> <p>4) Eliminating the continuing education requirement could make it easier to make a reciprocity agreement with North Carolina. Their Plumbing and Mechanical Board eliminated continuing education.</p> <p>“It is time to stop our dependence on our government to tell us how to run our lives, our trades and our businesses.”</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>
<p>Eric Lambert, Tradesman, International Brotherhood of Electrical Workers Local Union 666</p>	<p>Does not support the elimination of continuing education. It would destroy the qualifications of our state’s tradesman. It is the only way to keep trades up date.</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>
<p>William Leigers, Richmond Electricians JATC</p>	<p>Wants to make sure his doctor and his tradesman are up on the latest stuff. It should be once every 3 years. The majority of the courses they offer are cost free and the courses are offered at night for convenience. Their instructor used to work for DPOR. Thinks we need to keep continuing education and that it should be increased.</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>
<p>William Leskowsyk, Tradesman</p>	<p>Eliminating continuing education would foster unsafe and unprofessional installations and could have backlash with reciprocity agreements. The National Electrical Code is ever-evolving and if anything the current requirement is too lax. Requiring proper licensing and training is logical and</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted</p>

	welcomed by competent craftsmen.	amended regulations that leave the continuing education requirements for tradesman in place.
Casey Littlefield, Citizen, Education Provider, Inspector, Virginia Chapter of the International Association of Electrical Inspectors	Believes it is crucial to have recertification requirements for tradesman. Hairdressers require continuing education, shouldn't someone who builds have update training? Classes should be in sync with the code changes, which is every 3 years. Inspectors have many roles to fill and are unable to retrain contractors in the field. IAEI opposes the reduction of education.	After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.
James May, International Brotherhood of Electrical Workers Local Union 666	Consumers would be hurt by this and wonders what insurance companies would think of this.	After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.
Dustin Mclehaney, Tradesman, Virginia Plumbing and Mechanical Inspectors Association	Eliminating continuing education sends a message to the public that tradesman have learned everything they could learn. Disagrees with that thought, as he learns something new every day. Inspectors are required to complete continuing education and eliminating it from tradesmen implies that tradesmen do not need to learn anything new, but inspectors do. It is clear that tradesmen need continuing education based on questions he receives from them about the code. Thinks that more continuing education should be required for tradesmen. Certified Public Accountants are required to have 40 hours each year. Concerned that he did not receive any notification from DPOR about these proposed regulations. Was only aware because of his involvement with organizations and contacts that informed him. Relays that VPMIA is against the elimination of the continuing education program and offers their assistance on an advisory group to review potential improvements in lieu of eliminating continuing education.	After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.
Susan Milhoan, Plumbing and Mechanical Professionals of Virginia	Asks 4 questions for the record since this is not the proper place to pose questions to the Board. 1) How much is spent on CEUs now for the tradesmen that are supposed to be affected? 2) How much time is spent now on recording the CEUs for the tradesmen in question? 3) What was the cost of the new recording system that was	After reviewing all public comment received on these regulations, the Board has adopted amended regulations that

	<p>put in place to record CEUs to be used by the providers of education? 4) What is the estimated cost of CEU compliance by weld tradesman? If \$50,000 is saved, what duties with the displaced workers assigned, from what budget or will the budget be reduced by \$50,000?</p> <p>Rebuts a statement at an earlier hearing where a DPOR counterpart from North Carolina suggested the only parties in favor of keeping continuing education were associations that use courses as membership drivers. Her organization's revenue from that endeavor is less than 1/10th of 1% of their budget. Believes continuing education contributes to the professionalism of our trades.</p> <p>An 8 page document was submitted that lists links to articles about 148 incidents of carbon monoxide poisoning that has taken place in the US since January through June. 2 of them are in Virginia. "It is a life and death situation." Almost half of the 148 incidents resulted in deaths.</p>	<p>leave the continuing education requirements for tradesman in place.</p>
<p>Lawrence R Moter Jr., National Electrical Contractors Association, Atlantic Coast Chapter</p>	<p>The Association believes eliminating continuing education for tradesman is not in the best interest of Virginia and would harm public safety of individuals and property through faulty craftsmanship. Current knowledge of the National Electrical Code is a must as it is rapidly changing.</p> <p>He submitted a document showing the significant changes to the NEC for 2011 and 2014.</p> <p>He provided a letter from Michael Johnson, the Chair of the Correlating Committee of NECA, that expresses his surprise that Virginia is looking to eliminate continuing education. This is inconsistent with the trends of other states. Continuing education should not be eliminated, but warrants increasing the requirement.</p> <p>Provided a document written by John Klinger PE out of Austin that includes reasons to maintain continuing education requirements for electrical workers.</p> <p>Safety training and records of safety training require continuing education to become more of a condition of employment in many areas.</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>
<p>Chuck O'Donnell, Inspection Department for Fairfax County</p>	<p>Since the implementation of the tradesman continuing education program in 2007, we've seen better quality installations, which results in positive inspection results. It's a win-win-win. Tradesman can bid and install properly, inspectors can perform quality inspections and customers have fewer delays and cost overages. Eliminating continuing education will result in inspection rejections, installations having to be redone, and delays for the customer. A plumbing example was given that delayed the customer a week for a simple repair all because they hadn't attended continuing education.</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>

<p>Kevin O’Keeffe, Independent Electrical Contractors Chesapeake</p>	<p>The Independent Electrical Contractors (IEC) represents 150 electrical contractors. They strongly oppose the elimination of continuing education for electricians. Believes it is necessary to keep up with changes in codes. They disagree with the statement from the Board “Because continuing education for tradesmen does not seem to have an appreciable benefit and because it is an added expense that might affect tradesmen ability to maintain licensure or certification, the Board now proposes to do away with the continuing education requirements.” The 3 hour requirement is a nominal burden that has many benefits.</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>
<p>Thomas F. Olszewski</p>	<p>“If this is approved were going backwards. Next lets eliminate high school and grammar school.”</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>
<p>Steve Owen, City of Staunton</p>	<p>3 hours of education a year to stay current is a good public policy, a bare minimum, and should be continued. Asks how else will tradesmen stay current? His profession requires 40 hours a year of education and he is not directly responsible for building safety issues. Doctors and lawyers probably think they know everything they will need to know too and that is poppycock. That fact that North Carolina does not have continuing education means their citizens are less protected. “Citizens deserve and should demand better than this. Reforming the reform means going backward. Don’t go backward.”</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>
<p>Todd Patterson</p>	<p>“I think it’s a good idea to eliminate continuing education for tradesman who already have their license, they already use their books every day and take great pride in their work.”</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>
<p>Randy Pearce, City of Emporia Fire and Building Official, Association with VBCOA, VPMIA and VFPA</p>	<p>Not requiring continuing education, contractors will not purchase and keep up with codes. Clients that hire them are not getting well-informed and trained technicians. This is very dangerous with Fuel Gas Contractors, mechanical and electrical. Asks if you want someone performing work in your property with your family that is not to code?</p> <p>Inspectors will have to spend most of their time trying to teach them the codes while performing inspections. It costs the customer more money if changes result from the code not being known. Continuing education also addresses</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>

	<p>permit requirements. It's too late when a house burns down or a teenage inhales Freon because a contractor did not install locking caps.</p>	
<p>Andrew Porter, National Electrical Contractors Association</p>	<p>Safety and quality of installations are our ultimate concerns. The National Electrical Code can have up to 5000 changes considered. Dropping continuing education is contrary to trends. The great majority of states require continuing education and Maryland is considering adding the requirement. The electrical code coalition all support continuing education and are unequivocally opposed to dropping continuing education especially for electrical tradesman.</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>
<p>Michael D. Redifer, Building Official, Former Board Member of the Board for Contractors</p>	<p>It is important to look at the history which started the continuing education requirement. He was on the Board when it was implemented. One reason that prompted the Board to start this requirement was information from local building departments that, generally, tradesmen rarely were aware of changes to the various adopted codes. The method of educating was mostly jobsite sessions caused by unsatisfactory inspections. The diminishing number of tradesman cannot be attributed exclusively, if at all, to the implementation of continuing education. It could be due to a lack of interest in the trades, as supported by the Apprenticeship Council or a fluctuating economy. Recommended changes to the regulations for House Bill 1645 should be based on the results of the analysis and not solely a desire to cut costs. Knowledge of code requirements decreases the potential for tragedy and we cannot count tragedies that do not occur. There are many options available at little or no cost which can be brought to the table for consideration. Asks that the Board gets assistance from DHCD as well has organizations of code administrators and inspectors to revise the tradesman continuing education and not eliminate it.</p> <p>The inspector's role is to verify compliance with the Code and not to be primarily an instructor, although that is a role that the inspector plays every day. Feels the claim that there has been no appreciable decline in disciplinary cases brought before the Board is a little misleading. One alternative is to require continuing education every other renewal cycle.</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>
<p>Sean W. Reid, Program Manager of Johnson County Contractor Licensing</p>	<p>Provided a 2013 Fall Schedule of continuing education for Johnson County Contractor Licensing in Kansas.</p> <p>Johnson County licenses more than 3000 contractors in 10 disciplines. A self funded agency. Encourages the Board to retain continuing education. Johnson County has its own education program that is supported by license fees. Has distributed more than a million dollars worth of code books at no charge to the contractor. The classes have become a forum for attendees, contractors, building inspectors and design professionals to hear a uniform message. A side</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>

	<p>benefit of these classes is the network connections. Quality code education has given contractors the training and code books necessary to reduce the construction correction lists from inspectors. Customers and citizens benefit from continuing education. Urges the Board strongly not to eliminate code education. License fees for contractors in Johnson County are \$200 per year. They require 8 hours per year of continuing education for all types of licenses. They can take up to 64 hours that is offered for free to licensees. There are also 400 outside providers of education that provide approved education. Kansas does not have a statewide program but 14 of the jurisdictions participate in the program that Johnson County uses.</p>	
<p>Paul Rimel, Tradesman, Virginia Plumbing and Mechanical Inspectors Association, Inspector for the City of Staunton</p>	<p>The Board for Contractors must acknowledge its role which is to maintain and protect this important program for the good of all citizens. House Bill 1645 does not state that the Board should eliminate continuing education and there are other ways of reducing the burden on tradesman. Concerned that no alternatives have been discussed to meet the mandate of HB 1645. The reasons provided for eliminating the program from the agency statement seem anecdotal. Asks if the Board conducted a review of the facts provided by DPOR? It has been stated that tradesman do not want continuing education, but there have been almost no one commenting in agreement with the current proposal. Asks at what point will the Board go with the majority and act accordingly? Eliminating continuing education would place the health, safety and welfare of all citizens at risk.</p> <p>Disagrees with the opinion that there are not that many changes to the plumbing, mechanical and fuel gas codes. In 2010 there were 133 changes to the International Plumbing Code, 114 changes to the International Mechanical Code and 24 changes to the International Fuel Gas Code. It's as important for tradesman to know the changes as well as the reason for the changes. Continuing education should have a requirement that an instructor is available to interact with students. This can help educate the instructor as well. The Board should abandon this proposal to eliminate continuing education and work to improve the existing program.</p> <p>Provided documentation comparing the information submitted in 2006 for the implementation of continuing education with the information used in 2013 to justify eliminating continuing education.</p> <p>Stated he was unable to locate a current list of education providers on the website.</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>
<p>Richard Schwartz</p>	<p>Please do not make continuing education a part of renewal. I never learned anything that applied to service or repair and neither did those in the classes. Most critical changes in the code were being discussed by my class members before the teacher.</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended</p>

		regulations that leave the continuing education requirements for tradesman in place.
John Seay Jr., Past President of the Virginia Plumbing and Mechanical Inspectors Association	Strongly suggests the Board reconsiders their proposal to eliminate continuing education. If approved, Virginia will be going backwards keeping tradesmen up to date on new code changes. Maintaining the current standards will elevate professionalism and contribute to the health, safety and welfare of the citizens.	After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.
Grant Shmelzer, Independent Electrical Contractors, Chesapeake Chapter	Maryland is trying to replicate Virginia's program and effective July 23, 2013, requires 10 hours of continuing education for all master electrical license holders. North Carolina requires 10 hours and Pennsylvania is in subcommittee right now addressing statewide licensure and continuing education. If a recognized apprenticeship program is completed in Virginia to receive a journeyman's license, they are exempt from the Board exam to get a license. Continuing education is a way to ensure that at least people are keeping up with things, even if they don't have to sit for an exam. If this is a cost measure, there are ways that we can assist the Commonwealth in cutting down some of the recordkeeping processes that will be less cumbersome for the contractors and the board.	After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.
Charles Skelly, International Brotherhood of Electrical Workers Local 666, Tradesman	In favor of maintaining the continuing education requirements. Doctors, lawyers and teachers are subject to continuing education and there shouldn't be a difference. Doesn't think this is a positive step. The last code cycles had significant changes and the only way to make sure tradesmen stay current is to require continuing education. It makes sense to synchronize the licensing cycle with the code cycle. He's representing the 1100 members of the Local 666.	After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.
Dale Smith, City of Richmond, Mechanical Engineer	Remove continuing education altogether, as long as they are currently practicing their trades. Have the alignment of reinstatement matched with new building codes as this is on a 3 year schedule.	After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.
Dana Smith, Tradesman, Education Provider	He applauded the decision to start the continuing education requirements for tradesman. One tradesman he talked to uses a 15 year old code book. He finds the state of trades	After reviewing all public comment received on these

	<p>training in Virginia fair at best. Requiring tradesmen to stay current can only be a positive. 41 out of 50 states require electrical continuing education. 5 out of 50 states require 10 to 14 hours for renewal. 20 out of 50 states require more than 15 hours for renewal. All of these require more than the 3 hours that Virginia requires. 32 out of 50 states require plumbing continuing education. 31 of these 32 states require more than the Virginia requirement of 3 hours. Continuing education is not difficult, nor costly. He offers 2 solutions. 1) Continuing education could be required every code cycle rather than license renewal. 2) Have continuing education providers pay a fee to the Board to help cover costs.</p>	<p>regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>
<p>Rick Statzer, Building Inspector for the Town of Abingdon, VBCOA Region I</p>	<p>Speaking on behalf of VBCOA Region I. Opposed to the elimination of continuing education. Thinks it's a good thing and has a lot of good potential. Would like to see it coincide with the code change cycles.</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>
<p>James Steinle</p>	<p>Without continuing education, the citizens will suffer. Consumers aren't qualified to know what's needed to make sure they get clean drinking water, high quality indoor air or electrical services. It's the Board's job to preserve the integrity of all tradesmen by mandating continuing education. The existing program needs work and those in the industry are willing to help. The cost of this program should not cost DPOR a dime. Contractors should pay for it through licenses and fees as needed.</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>
<p>Les Stody, National Associate of Power Engineers</p>	<p>Has overseen the training for 1,939 tradesmen. The majorities of these individuals are older and were licensed before the formal classroom training was required for their apprenticeship programs. Many of them haven't had any formal training for probably 30 to 50 years. They appreciate the classroom environment where they can interact with other tradesmen and ask questions. Continuing education is a beneficial program and it should definitely be required, but no more than once every 3 years with the cycling of the code.</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>
<p>John Strang, Tradesman</p>	<p>Has always been appalled that Virginia law requires a license for this type of work but does not enforce it. Manicurist, barbers and lawyers are required to display their licenses. Millions would be generated if licenses were required for tradesman. Paying for code upgrade requirements is ridiculous for a tradesman in a state where the license law is not enforced. Implores the Board to require trades work to be licensed or an apprenticeship and require continuing education for them.</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education</p>

		requirements for tradesman in place.
Kent L Tamkin, Warren County Building Department	“Continuing Education” (This is the entire comment.)	After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.
Joey Teets, Tradesman, Fairfax Count Public Schools	Truly believes in the value of required continuing education and the current requirement should be increased in hours and not cut. License renewal and continuing education requirement should be on a 3 year cycle to match the code change cycle. 6 hours should be required.	After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.
Michael Toman, Mega Power Electrical Services, Tradesman, Contractor	Opposed to the proposed regulations to do away with continuing education. He served on the Code-Making Panel II for the National Electrical Code for 5, 3-year cycles and saw an average of 6000 proposed changes for each cycle. 10 to 20% of those are accepted into changes to the Code. It puts the public safety at risk if electricians aren’t aware of these changes. Some big changes that are very important are Arch Fault Circuit Interrupters and Tamper-Proof Receptacles. It’s all about safety, preventing fires and personal injury through electrical shock. Electric cars and charging stations will be everywhere soon.	After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.
Guy Tomberlin, Tradesman, VBCOA, VPMIA, Code Official	Encourages the Board to retain continuing education for tradesman. Would like for the board to consider all public comments and petition signed. Urges the board to consider making adjustments in the identified areas of concern to improve the quality of the program. Many groups are willing to assist the board, who has identified the limitations of their resources. Working together will enhance the protection of the public health, safety and welfare. Is in staunch opposition to DPOR’s recommendation to eliminate continuing education for tradesman. The incorporation of the program in 2007 was one of the most valuable programs implemented for the protection and enhancement of the, health, safety and welfare of the citizens. Buying a home is typically one of the largest investments someone will make and the folks that come and work on that product should be trained and qualified. If we lose tradesman due to them not wanting to get training, that’s a good thing. It was stated that DPOR gets 3000 phone calls about continuing education. An approach could	After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.

	<p>be to count the issues and not the amount of calls and try to address those. A representative from North Carolina addressed the Board about their failing program that was ultimately deleted. Asks the Board why do we want to model ourselves after a failing program? Instead, we should model ourselves after successful programs like Kansas. Audience members were not allowed to address the Board when they voted on the NOIRA. If given the chance, it may have swayed the Board's vote and the proposed regulations may not have made it to this stage. Perhaps a 3 year program. This would lead to a 33% cost saving and a decrease in work load by 33%.</p>	
Roland B Vest	<p>Representing 7 IBEW locals in Virginia, Maryland and Washington DC and 2 local unions on the border of Virginia and West Virginia. Supports the keeping of continuing education. This will help with agreements with other states. Proud of the license held and the education with it.</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>
Barry Williams, New River Electrical Corporation, Tradesman	<p>Opposes the changes. Continuing education is very important for tradesmen. The electrical trade is a very dangerous profession. It's a hazard and a threat to their life if they're not qualified. Agrees with extending the duration on their license to 3 years.</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>
Andrew Wilson, Building official and the fire marshal for the City of Fairfax, Tradesman	<p>If continuing education is stopped, all that is being done is transferring this cost. Tradesmen are going to get educated, either by the inspectors when failing the inspections or the tradesmen are going to get it through continuing education. Thinks the amount of training required right now is not enough. It should be 4 to 8 hours minimal.</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>
Tony Wilson, Tradesman	<p>Continuing education for electricians should be maintained or the effects would leave the industry without the training that is needed.</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for</p>

<p>Rick Witt, Director of Building Inspections for Chesterfield County</p>	<p>Strongly urges the Board to not remove the continuing education requirement for tradesman. This is a public safety and consumer protection issue and should not be eliminated based solely on a cost cutting perspective. Urges the Board to direct staff to put together an advisory group of affected interest groups to review options.</p>	<p>tradesman in place. After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>
<p>Virginia's Code Enforcement and Tradesman Organizations</p>	<p>A report submitted that was composed by several organizations – Virginia Plumbing & Mechanical Inspectors Association (VPMIA), Virginia Building & Code Officials Association (VBCOA), Virginia Chapter International Association of Electrical Inspectors (IAEI), Virginia Fire Prevention Association (VFPA) and Plumbing & Mechanical Professionals of Virginia (PMPV). The report includes information on reasoning used in the implementing of continuing education, House Bill 1645, the DPOR Continuing Education Fact Sheet distributed to the Board in 2013, information comparing Virginia's code with North Carolina's code, and a Stakeholder Recommendations to the Board. The recommendation is to not eliminate continuing education, but make changes to the existing program. 1) Implement a 3 year renewal cycle. 2) Appoint a Negotiated Rule Making Panel per the Board's Public Participation Guidelines or, if preferred, a committee facilitated by DPOR specifically for reviewing and evaluating education programs.</p>	<p>After reviewing all public comment received on these regulations, the Board has adopted amended regulations that leave the continuing education requirements for tradesman in place.</p>

All changes made in this regulatory action

Please list all changes that are being proposed and the consequences of the proposed changes. Describe new provisions and/or all changes to existing sections.

Current section number	Proposed new section number, if applicable	Current requirement	Proposed change, intent, rationale, and likely impact of proposed requirements
<p>18 VAC 50-30-120 B</p>		<p>Requires all individual license and certification holders to apply for a new license or certification if past the one year reinstatement period.</p>	<p>This proposed amendment will extend the reinstatement period for all individual license and certification holders (Tradesman, Water Well System Providers, Elevator Mechanics and Accessibility Mechanics) from one year to two years. The requirement for making the applicant apply for a new license and</p>

			meet current requirements after reinstatement period ends will remain the same. This change will give these individuals that let their license lapse an additional year to pay the reinstatement fee to get their license back. This will reduce the expense to those individuals that must pay to re-take the exam and the time to wait for a new application to be reviewed.
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