



Final Regulation Agency Background Document

Agency name	Dept. of Criminal Justice Services
Virginia Administrative Code (VAC) citation	6 VAC 20-171
Regulation title	Regulations Relating to Private Security Services
Action title	Private Security Services Regulations
Document preparation date	7/07/2003

This information is required for executive review (www.townhall.state.va.us/dpbpages/apaintro.htm#execreview) and the Virginia Registrar of Regulations (legis.state.va.us/codecomm/register/regindex.htm), pursuant to the Virginia Administrative Process Act (www.townhall.state.va.us/dpbpages/dpb_apa.htm), Executive Orders 21 (2002) and 58 (1999) (www.governor.state.va.us/Press_Policy/Executive_Orders/EOHome.html), and the *Virginia Register Form, Style, and Procedure Manual* (http://legis.state.va.us/codecomm/register/download/styl8_95.rtf).

Brief summary

*Please provide a brief summary of the proposed new regulation, proposed amendments to the existing regulation, or the regulation proposed to be repealed.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. Do **not** state each provision or amendment or restate the purpose and intent of the regulation.*

The proposed amendments are to update the minimum training standards based upon the results of the job task analysis. The Private Security Services Advisory Board and volunteer members of the industry served on the Job Task Analysis Committee.

The amendments focus on improving the licensing, registration, certification, training requirements, fees and procedures. It will also identify areas of confusion or weakness that currently exist that may not protect the health, safety, or welfare of the citizens of the Commonwealth.

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 taking the action, and (3) the title of the regulation.

On June 12, 2003, The Criminal Justice Services Board adopted the amended Regulations Relating to Private Security Services.

Legal basis

Please identify the state and/or federal source of legal authority to promulgate this proposed regulation, including (1) the most relevant law and/or regulation, including Code of Virginia citation and General Assembly bill and chapter numbers, if applicable, and (2) promulgating entity, i.e., the agency, board, or person. Describe the legal authority and the extent to which the authority is mandatory or discretionary.

If the final text differs from the text at the proposed stage, please indicate whether the Office of the Attorney General has certified that the agency has the statutory authority to promulgate the final regulation and that it comports with applicable state and/or federal law.

The legal basis for promulgating the regulation is in §9.1-141(A)(C) Code of Virginia.

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 purpose of the regulations is to amend and revise the rules mandating and prescribing standards, requirements, and procedures that serve to protect the citizens of the Commonwealth from unqualified, unscrupulous, and incompetent persons engaging in the activities of private security services. A public hearing will be held during the promulgation process and participation from the private security services industry will be strongly encouraged. These amendments incorporate changes that continue to protect the public safety and welfare, amend specific fees to regulated individuals and allow the agency to more expeditiously license and certify individuals and businesses who have fulfilled application requirements.

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.

Fee changes are proposed that contain increases and decreases to the private security industry.

United States citizenship or legal resident alien of the United States requirement is being added. The private security industry, the Federal Bureau of Investigation, and the State Police pointed out this as a breach of security in our current certification, registration and licensure system.

Fingerprints are required on all unarmed security officers after January 1, 2003. This change is included in the regulations.

The reinstatement period is reduced from 90 days to 60 days.

Administrative & standard of conduct requirements have been added

The remainder of the regulations is not substantive changes; they are for clarification and edification.

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.*

The advantages that these regulations provide to the general public are that they:

- (i) Set forth standards, procedures, and requirements that serve to protect the safety and welfare of the general public from deceptive or misleading private security services business practitioners, and;
- (ii) Secure the public safety and welfare against incompetent, unscrupulous and unqualified persons by establishing methods of licensure, registration and certification that serve to enhance the competency of persons performing or engaged in the activities of private security services.

A possible disadvantage of these regulations is that the program it prescribes receives no moneys from the General Fund, therefore, the cost to administer the program must be absorbed by the affected entities.

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.

Section number	Requirement at proposed stage	What has changed	Rationale for change
10	Definitions not included	Definitions add for the following: -Electronic roster submittal -Firearms endorsement -Official documentation -On Duty -Physical address -Private security services business personnel definition	Add clarity to the regulation
30.A 30.A.1 50.B.5 50.B.8 60.A. 60.C.6 60.F 80.B.5. 80.B.5 80.B.7 80.10 80.110.E.		Minor wording changes for grammar or clarity	Add clarity to the regulation
120. A.	Amend last two sentences	Now reads: Individuals who carry or have access to a firearm while on duty must have <u>a valid registration with a firearm endorsement</u> . If carrying <u>a handgun</u> concealed, the individual must <u>also</u> have a valid concealed handgun permit, <u>and the written permission of his employer pursuant to §18.2-308 of the Code of Virginia.</u>	Comply with legal requirements and industry wishes.
120.c.w	Sub paragraph number "2" accidentally stricken.	Remove strickout.	Correction.
130.E	Amend sentence	Now reads: Any renewal application received by the department shall <u>meet all renewal requirements prior to the expiration date of a registration or shall be subject to the requirements set forth by the reinstatement provisions of this chapter.</u>	Clarification of policy
180.B.	Amend sentence	Now reads: A renewal application <u>must be</u> received by the department within <u>60</u> following the expiration date of the license, registration <u>in order to be reinstated by the department providing all renewal requirements have been met.</u>	Returns the time for receiving a renewal applications from 90 days to 60 days at request of industry members.
180.D.	Word change.	First line, following the word "and" insert "may"	Clarify sentence.

190.A.4	Amend sentence.	Second line, delete the last part of sentence beginning after “employed” and insert “ <u>provided said assignment does not occur within the 120 day period immediately preceding the expiration date of the registration or certification.</u> ”	Delete unnecessary provision.
200.A.	Word change	Third line, after “turpitude” delete one comma.	Grammar correction.
220.A.1.	Word change	First line, after the word “physical” delete the word “address” and insert the word “location.” Same on line three.	Clarification
220.A.8	Addition	First sentence after “Maintain at all times” add “and for a period of not less than three years from the date of termination of employment”	Limit document retention
230.A.4.b&c	Additions	“b.” After “alarm respondents” insert “with firearms endorsement” “c.” After “alarm respondent” insert “without firearms endorsement”	Clarify both paragraphs
230.A.4.c.1.	Word change	Line 1, insert “Their” and change to “fingerprints”	Grammar correction.
230.A.4.d.	Word change	Line 3, delete “training “ after firearms	Clarification to read Firearms Endorsement
230.A.11	Word change	Line 2, after “certification renewal,” delete “or certification to act as compliance agent for a licensee, training school, school director, or instructor” and insert “or firearms endorsement.”	Clarification –deleted portion is already included in sentence.
230.A.16	Amend sentence	Now reads: When providing central station monitoring services, attempt to verify the legitimacy of a burglar alarm activation by <u>calling the site of the alarm, if unable to make contact, call one additional number provided by the alarm user who has the authority to cancel the dispatch.</u> (This shall not apply if the alarm user has provided written authorization requesting immediate <u>or one call dispatch to both their local police department and their dealer of record.</u> This shall not apply to duress or hold-up alarms.	Requested to be amended by the Virginia Burglar and Fire Alarm Association
230.A.24	Word change	Line 1, after “violate” delete “the Virginia Uniform Statewide Building Code” and insert “any state or local ordinances”	Incorporates local ordinances as well as state code into the regulation.

230.a.28		Delete sentence.	Edification
240.A.10.d.	Word change	Line 1, after “acting as” insert “a” and after “one” delete “license” and insert “licensed”	Grammar correction.
250.A.1.	Word change	Line 1, after word “physical” delete “address” and insert “location.” Same after line 3.	Clarification
250.A.3	Word change	Line 1, after “termination of” delete “eligibility” and add “ the services” . . .	Edification
250.A.14.	Word change	Line 3, after “department,” insert “to include hours of instruction”	Clarification
250.A.19.	Word change	Line 3, after “chapter” insert “to include the hours of instruction”	Clarification
260.A.18	Word change	Line 3, before “logo” delete “any” and insert “your”	Clarification
260.A.22	Word change	260.A.22 - Line 1, after “violate,” delete “the Virginia Uniform Statewide Building Code” and insert “any state or local ordinances	Make the statement more general to include all state or local ordinances
270.A.8	Word change	Line 1, after “violate,” delete “the Virginia Uniform Statewide Building Code” and insert “any state or local ordinances”	Make the statement more general to include all state or local ordinances
280.A.14	Word change	Line 1, after “violate,” delete “the Virginia Uniform Statewide Building Code” and insert “any state or local ordinances.”	Make the statement more general to include all state or local ordinances
300. C.1.	Word change	Line 3, after “partial” delete “waiver” and insert “exemption to training”	Clarification
300.C.4.	Word change	Line 4, after “students or to” delete “involves” insert “involve”	Grammar correction
300.D.5.	Word change	Line 1, after “exceed” delete “eight” and insert “nine” Line 1, after “per day,” delete “however, firearms classroom sessions may not exceed nine hours of instruction per day. Line 4, after “allotment of” delete “eight” and insert “nine”	Edification
320.A.8	Word change	Line 3, insert “state issued” in front of “photo identification card”	Edification
320.A.10	Word change	Line 2, after “firearms by type,” add “of action” and delete “type of actions: all double action, double/single action, all single action,”	Clarification
350.B	Word change	Line 1, after “only if” delete “submitted to the department within 12 months of completion of training” and insert “application for	Clarify sentence

		registration or certification is submitted to the department within 12 months of completion of training”	
350.C		Delete	Was new language and we deleted it Not necessary
350.C.	Change letter designation	Change Letter to“D” to correct designation after renumbering.	Clarification after change above.
350.C.2.b	Word change	Line 2, after “14 hours” Delete “(includes 4 hours of range dry fire and low level lighting)” and insert “(includes dry fire, and judgmental shooting and low level light shooting familiarization)”	Edification
350.C.2.d	Word change	Line 2, after “of this part)” delete “1” and insert “2”	Correction
350.C.5.e.	Word change	Line 2, after “14 hours” insert “plus one practical exercise”	Correction
360 A.2	Word change	Line 2, before “months,” delete “24” and insert “12” to be compatible with 6 VAC 20-171-110.B.1, page 26.	Correction
360.C.12.a.		Delete first part of sentence “Regulations review and”	Edification
360.C.12.b	Word change	First part of sentence, after “Techniques of” delete “instruction delivery” and add “delivery of instruction and other related topics”	Edification
365.A	Word change	Line 3, after “with each type” add “of action” delete “type of actions: all double action, double/single action, all single action,”	Clarification
370.A.1.k.	Word change	First word, Delete “Dim” and insert “Low level”	Clarification
370.B.1	Word change	Line 3, after “range portion of the training.” Insert “Equipment needed: handgun, belt with directional draw holster, ammunition (60 rounds)”	Clarification
370.B.2	Word change	Line 1, after “Factory loaded” delete “semi-wadcutter” and insert “practice”	Clarification
370.B.3	Word change	Line 1, after “double action,” insert “or double single action”	Clarification
370.B.6	Amend sentence	Now reads: A certified firearms instructor must be <u>present on the range directly controlling the fire line on the firing line</u> during all phases of firearms training. There shall be a minimum of one <u>certified</u> firearms instructor per five shooters on the line.	Clarification
370. B.8.		After Line 5, “300= .75 – 75%”	Edification

		Add a second paragraph to read: <u>"FBI Q target: all hits inside the bottle – value 5 points; hits outside the bottle – value 0 points."</u>	
370. B.9.		Line 1, after "scored as" delete "follows: B27 target: (all hits inside the 7-ring count 5 points, any hits outside the 7-ring count) point." and Insert "indicated above. This is strictly a familiarization course with no pass or fail grade provided."	Edification
370.C.1 & 2	Word change	Line 1, after "weaver" insert "Modified Weaver,"	Clarification
370.C.2	Word change	Line 1, after "weaver" insert "Modified Weaver,"	Clarification
370.D	Word change	Line 4, after "magazines," delete "duty" and insert "range" Line 4 after "ammunition" change "24" to "30"	Correction
370.D.2.b.	Word change	Line 1, after "command," delete "draw"	Clarification
370.D.3	Word change	Line 9 on page, Delete "KNEELING POSITION MUST USE THE BARRICADE POSITION"	Correction
390	Word change	Line 2, after "specialist" insert "who wish to have firearms endorsement"	Clarification
390.B.3	Word change	Line 1, after " specialist " delete " <u>advanced handgun</u> "	Clarification
Article 4	Word change	Training Waivers delete "Waivers" and insert "Exemptions"	Clarification
460.A	Addition	Add paragraph 3 <u>3. Proof of attendance and successful completion.</u>	Clarification
480 A.		Line 4, after " ethical standards " delete "and"	Clarification
90.A		Line 6, after "plus reinstatement fees." insert " <u>Outstanding fees or monetary penalties owed to DCJS must be paid prior to issuance of said renewal.</u> "	DPB – added for consistency
90.C.4		Line 3, after "requirements; and" insert new number "4" <u>Each new and additional supervisor must submit their fingerprints to the department pursuant to 9.1-139.H.</u>	DPB – added for consistency
90.C.4.		Renumber "4" to "5" to correct numbers.	Correction
430.A.1		Line 2, after "Curriculum" delete "24" and insert "18"	Correction
430.B		Line 10, Total hours, after	Correction

		“examinations”) delete 28” and insert “30”	
220.A.19		Line 1, after “carry a” insert “state issued”	Clarification
240.A.10.d		Line 1, after “carry a” insert “state issued”	Clarification
320.A.8		Line 1, after “private security” insert “state issued” Line 3, after “obtain the” insert “state issued”	Clarification
340.A.8		Line 1, after “private security” insert “state issued” Line 3, after “obtain the” insert “state issued”	Clarification
320.A.14		Line 1, after “officer” delete “detective”	New proposed language no longer included

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

See Appendix A for Public Comment Matrix.

All changes made in this regulatory action

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

Current section number	Proposed new section number, if applicable	Current requirement	Proposed change and rationale

Please see section on changes made since proposed stage. All changes are noted there.

Impact on family

Please assess the impact of the proposed regulatory action on the institution of the family and family stability.

The regulations will directly impact any family who uses private security services (such as residential alarm monitoring) in terms of the assurance of competent registrants as well as providing a venue to register complaints about any private security registrant, training school, or business in the Commonwealth of Virginia. The regulations indirectly impact the family by providing a regulatory program that protects the public from unscrupulous, incompetent or unqualified persons engaging in the activities of private security services, and by setting standards and procedures that enhance professionalism and the quality of services by the private security profession.

Appendix A
 Revised June 10, 2003

**SUMMARY MATRIX OF COMMENTS AND RECOMMENDATIONS REGARDING
 “PROPOSED”
 REGULATIONS RELATING TO PRIVATE SECURITY SERVICES**

PART I.	DEFINITIONS.		
<i>Regulation Cite</i>	<i>Comments/Issues/Recommendations</i>	<i>Respondent(s)</i>	<i>Agency Response</i>
Page 1, 6 VAC 20-171-10.	Please be explicit regarding what materials require the license number and which do not.	Chris Stuart	Department recommends not incorporating this suggestion. (The definition of Business Advertising Material is explicit.)
Page 2, 6 VAC 20-171-10.	Under the definition for Compliance Agent delete - an owner or employed by, a licensed private security services business and add “designated by the licensed private security services business to act as a compliance agent”	PISA	Department recommends not incorporating this suggestion. (Requires a legislative change.)
Page 2, 6 VAC 20-171-10.	Insert in the definition for Central Station Dispatcher, “from a remote location off of the facility being protected”	Securiguard – Roger Bruley	Department recommends not incorporating this suggestion. (Requires a legislative change.)
Page 2, 6 VAC 20-171-10.	The “date of hire” and when someone begins to perform duties may not be one in the same.	Bill Scouten	Department recommends not incorporating this suggestion. (This is not new regulatory language. DCJS requires fingerprints to be submitted on or before the date of hire meaning before the person performs services regulated by the department.)
Page 5, 6 VAC 20-171-10	Add “Lawful permanent	PISA	Department

	resident” means any person not a citizen of the United States who is residing in the U.S. under legally recognized and lawfully recorded permanent residence as an immigrant.		recommends not incorporating this suggestion. (We sought legal advice and utilized the Department of Justice as a resource.)
Page 5, 6 VAC 20-171-10	Supports the change requiring mailing address, phone and email, if applicable	Richard D. Hinkley	Department recommends not incorporating this suggestion.
Page 5, 6 VAC 20-171-10	Under “Physical address” strike “the entity for” and strike “the location where the individual principals of a business reside”.	PISA	Make partial recommended change. (Delete only “the entity for”)
Page 5, 6 VAC 20-171-10	“Physical address” why list this, removed requirement in 6 VAC 20-171-120.C.2 and 6 VAC 20-171-140.C.2	Gary Lewis	Department recommends not incorporating this suggestion. (Still requirement for Businesses & Schools)
PART II.	APPLICATION FEES.		
<i>Regulation Cite</i>	<i>Comments/Issues/Recommendations</i>	<i>Respondent(s)</i>	<i>Agency Response</i>
Page 9, 6 VAC 20-171-20.	Oppose business license category fee	PISA	Department recommends not incorporating this suggestion.
Page 9, 6 VAC 20-171-20.	Opposes all fee increases	John Kochensparger	Department recommends not incorporating this suggestion.
Page 9, 6 VAC 20-171-20.	The fees associated with licensing are too high.	Chris Stuart	Department recommends not incorporating this suggestion.
Page 10, 6 VAC 20-171-20.A	Oppose increased fees for Initial Certification and fingerprint processing, officer cannot afford.	Audrey S. Lipscomb	Department recommends not incorporating this suggestion.
PART III.	APPLICATIONS PROCEDURES AND REQUIREMENTS.		
<i>Regulation Cite</i>	<i>Comments/Issues/Recommendations</i>		

	<i>ndations</i>		
Article 1.	Criminal History Records Search.		
Page 11, 6 VAC 20-171-30.A.	Should read “on or before the date of hire” delete first and change day to date	John Kochensparger	Make recommended change.
Page 11, 6 VAC 20-171-30.A.	Suggest reword first sentence to On or before the first day of hire, all Private Security Services personnel to be employed in regulated categories shall submit fingerprint cards to the Department. Insert “initial” before licensing (<u>would also change licensing to licensure</u>), certification and registration throughout Paragraph A.	PISA	Make partial recommended change. (change licensing to licensure)
Page 12, 6 VAC 20-171-30.A.4.	Do we need to provide criminal information again if it has been previously supplied?	Bill Scouten	Department recommends not incorporating this suggestion.
Page 12, 6 VAC 20-171-30.D.	Have State Police provide results of fingerprint checks to compliance officer	Securiguard Inc.	Department recommends not incorporating this suggestion. (Requires a legislative change)
Page 12, 6 VAC 20-171-30.D.	Do “in-house” folks need to be notified if applicant fails background check?	Bill Scouten	Department recommends not incorporating this suggestion. We are unable to notify “in-house” folks because we are not provided with the proprietary security contact information.
Article 2.	Private Security Services Business License.		
Page 15, 6 VAC 20-171-50.B.8	Oppose all references to business license category(ies)	PISA	Department recommends not incorporating this suggestion.

Page 15, 6 VAC 20-171-50.B.8	Change this service to these services and add Central Station Dispatchers to crossover with Sec. And ES category.	Securiguard, Inc.	Make first recommended change but not second.
Page 16, 6 VAC 20-171-50.H.	Add lawful permanent resident, strike legal resident alien	PISA	Department recommends not incorporating this suggestion.
Page 17, 6 VAC 20-171-60.C.6.	Add On the first day of employment, each new and additional supervisor . . .	PISA	Make recommended change.
Page 17, 6 VAC 20-171-60.b.1.	Does 12 month rule still apply	Bill Scouten	Department recommends not incorporating this suggestion.
Page 18, 6 VAC 20-171-60.F.	Suggest Category (ies) not (s)	John Kochensparger	Make recommended change.
Article 3.	Compliance Agent Certification.		
Article 4.	Private Security Services Training School Certification.		
Article 5.	Private Security Services Instructor Certification.		
Page 23, 6 VAC 20-171-100.A.3	Oppose submittal of waiver applications for Firearms instructor and Instructor development course	PISA	Department recommends not incorporating this suggestion.
Page 26, 6 VAC 20-171-110.B.1.	Oppose “within 12 months, immediately preceding the expiration date of the current certification”	PISA	Department recommends not incorporating this suggestion.
Article 6.	Private Security Services Registration.		
Page 27, 6 VAC 20-171-120.A.	Suggest rewording of new last two sentences, Individuals who carry or have access to a firearm while on duty must have a valid registration with a firearm endorsement . If carrying a handgun concealed, the individual must also have a valid	PISA	Make recommended change.

	concealed handgun permit, and the written permission of his employer.		
Page 27, 6 VAC 20-171-120.A.	Last sentence is concluded with “handgun permit in conjunction with §18.2-308 et seq. of the Code of Virginia”.	John D. Kochensparger	Make recommended change with slight modification. (use “pursuant to” instead of “in conjunction with”)
Page 28, 6 VAC 20-171-120.C.3.	Add Evidence of fingerprint cards . . .	PISA	Department recommends not incorporating this suggestion. .
Page 29, 6 VAC 20-171-120.D.2	Confused over 120 days versus 90 day requirement	John Kochensparger	Department recommends not incorporating this suggestion. This is not new regulatory language. We allow 90 days to complete training and an additional 30 days for the department to process their paper work and issue credential.
Page 29, 6 VAC 20-171-120.D.2	Do we need to add temporary? Same question asked to the certification category and the licensure category. Same like response	Bill Scouten	Department recommends not incorporating this suggestion. This is not new regulatory language. The registration covers temporary or permanent.
Page 29, 6 VAC 20-171-120.D.3	Suggest changing did not fail to failed	PISA	Department recommends not incorporating this suggestion.
Article 7.	Private Security Services Certification.		
Page 31, 6 VAC 20-171-140	This entire article should be deleted in accordance with the changes in the Code effective 7/1/02 and all references to the 90-day period to complete training requirements must be included under the	PISA	Make all regulatory changes pursuant to the Code of VA effective July 1, 2003.

	Registration article.		
Article 8.	Additional Categories/Replacement Identification.		
Article 9.	Reinstatement and Renewal Extension.		
Page 35, 6 VAC 20-171-180.B.	Should remain at 90 days not 30	Chris Stuart –Top Guard John Kochensparger PISA	Department recommends to allow an additional 30 days making it 60 days not 30.
Page 36, 6 VAC 20-171-180.C.	30 days is not enough time to enroll in school, suggest 45 days.	Audrey S. Lipscomb	Department recommends increasing it to 60 days.
Page 36, 6 VAC 20-171-180.B.4.	Be amended to read <i>The department may not reinstate . . .</i>	PISA	Department recommends not incorporating this suggestion. (After this time period they will not be allowed to reinstate but must reapply as an initial license)
Page 37, 6 VAC 20-171-180.A.4.	Oppose “provided said assignment does not occur within the 120 day period immediately preceding the expiration date of the registration or certification.”	PISA	Make recommended change.
Article 10.	Application Sanctions; Exemptions; Recognition/Reciprocity.	Respondent(s)	Agency Response
Page 38, 6 VAC 20-171-200.C.	“Any false or misleading <i>material</i> statement . . .”	PISA	Department recommends not incorporating this suggestion.
PART IV.	ADMINISTRATIVE REQUIREMENTS/STANDARDS OF CONDUCT.		
<i>Regulation Cite</i>	<i>Comments/Issues/Recommendations</i>	<i>Respondent(s)</i>	<i>Agency Response</i>
Article 1.	Private Security Services Businesses.		
Page 40, 6 VAC 20-171-	<i>Have designated</i> at all times	PISA	Department

220.A.7.	at least		recommends not incorporating this suggestion. (Code says employ not designate)
Page 41, 6 VAC 20-171-220.A.8.	Maintain at all times <i>and for a period of not less than 3 years from the date of termination of employment</i> the following documentation concerning all regulants: . . .	PISA	Make recommended change.
Page 41, 6 VAC 20-171-220.A.11	Recommend “ <i>With the exception for business operated from private home,</i> ” prominently display . . .	Private Investigators Association of Virginia, Inc.	Department recommends not incorporating this suggestion.
Page 42, 6 VAC 20-171-220.A.13	Amend this regulation to require reporting of all felonies, and all misdemeanors except those of a fine less than \$250 or alcohol or drug related offense.	Securiguard, Inc	Department recommends not incorporating this suggestion. Requires a legislative change
Page 44, 6 VAC 20-171-230. B+C.	Appear to be in conflict.	Bill Scouten	We will list Alarm respondent with firearms endorsement in paragraph B and will list Alarm respondent without firearms endorsement in paragraph C.
Page 44, 6 VAC 20-171-230. A.4.b,	Specify <i>armed</i> alarm respondents	PISA	Similar change made noted above.
Page 44, 6 VAC 20-171-230. A.4. c.	Specify <i>unarmed</i> alarm respondent	PISA	Similar change made noted above.
Page 44, 6 VAC 20-171-230. A.4. c.(1)	Include the word - <i>Their</i> fingerprints cards, have been submitted...	PISA	Make recommended change.
Page 45, 6 VAC 20-171-230. A.4. d.	Remove <i>training</i> from . . .obtaining a valid registration and firearms <u>endorsement</u> from the department; and	PISA	Make recommended change.
Page 46, 6 VAC 20-171-230.A.10	Is all that language required or can it just be referenced by Code.	Bill Scouten	Department recommends not incorporating this suggestion. This is not

			new regulatory language. We need to list it here and it is also referenced by the Code.
Page 46, 6 VAC 20-171-230.A.11	Delete training school, school director or instructor because Compliance agents are not required for schools.	Bill Scouten	Department recommends amend to read “Not obtain a license, license renewal, registration, registration renewal, certification, certification renewal, or firearms endorsement, through any fraud or misrepresentation.”
Page 47, 6 VAC 20-171-230. A. 16	Amend #16 – to read: When providing central station monitoring services, attempt to verify the legitimacy of a burglar alarm activation by calling the site of the alarm, if unable to make contact, call one additional number provided by the alarm user who has the authority to cancel the dispatch. (This shall not apply if the alarm user has provided written authorization requesting immediate or one call dispatch to both their local police department and their dealer of record).	Virginia Burglar and Fire Alarm Association	Make recommended change.
Page 47, 6 VAC 20-171-230.A.18	Spell out the sections understanding regarding flashing lights and the referenced Code. Specify “amber” flashing lights.	Chris Stuart – TopGuard PISA	Department recommends not incorporating this suggestion. It is specified in the Code Section.
Page 47, 6 VAC 20-171-230.A.22-28	Suggest deleting paragraph 22-28.	PISA	Department recommends not incorporating this suggestion.
Page 48, 6 VAC 20-171-230.A.24	Suggest “ <i>All Private Security Businesses occupying Commercial Property owned</i> ”	Private Investigators Association of Virginia, Inc.	No changes made here but we are amending this section to read “not

	<i>by the business that is located within the State must not violate the Virginia Uniform Statewide Building Code in the occupied property.”</i>		violate any state or local ordinances.
Page 49, 6 VAC 20-171-240.A.6	Deleted language should be applied to entire regulation where it appears	Bill Scouten	Department recommends not incorporating this suggestion. The department is attempting to make the decision less confusing if reporting is required.
Page 50, 6 VAC 20-171-240.A.10.d	What is the purpose of this requirement?	Chris Stuart – TopGuard	Department recommends incorporating “unless the card is one in the same.” Currently the card is one in the same but this regulation will allow the Department the flexibility to issue a separate registration card and utilize a picture ID if DMV fees become cost prohibitive.
Page 50, 6 VAC 20-171-240.A.10.d	Add the phrase, “unless the card is one in the same”	Securiguard, Inc	Make recommended changes.
Page 50, 6 VAC 20-171-240.A.10.d	Suggest to delete “photo identification card along with their”	PISA	The change made above should alleviate this concern.
Page 50, 6 VAC 20-171-240.A.10.d	340.A.8. only requires regulated employees to get and carry a “State Issued Photo ID Card,” and 320.A.7 and 340.A.8 only require the “private security photo identification card” to be carried while on duty, why should Compliance Agent be required to ensure what the regs do not require? Suggest “ <i>Shall ensure that all regulated employees carry the state issued photo</i> ”	Private Investigators Association of Virginia, Inc.	The change made above should alleviate this concern.

	<i>identification card.”</i>		
Page 50, 6 VAC 20-171-240.A.10.d	Ensure that State issued photo identification cards continue to be a part of the registration process.	Chris Stuart	No regulation change requested.
Page 51, 6 VAC 20-171-240.A.11.	Suggest deleting “Not engage in acts of unprofessional conduct in the practice of Private Security Services.”	PISA	Department recommends not incorporating this suggestion.
Page 51, VAC 20-171-240.A.12, 13, 14, 15 & 16.	While these are appropriate and a good thing in 6 VAC 20-171-230 they are not “appropriate and good” in this section.	Private Investigators Association of Virginia, Inc; PISA	Department recommends not incorporating this suggestion. (Compliance Agents need to set the example and follow the regulations)
Article 2.	Private Security Services Training Schools.		
Page 52, 6 VAC 20-171-250.A.2	Suggest amending to read, “Have <i>designated</i> at all times . . .”	PISA	Department recommends not incorporating this suggestion.
Page 52, 6 VAC 20-171-250.A.3	Suggest amending to read “Upon termination of <i>the services</i> of a certified instructor, . . .”	PISA	Make recommended change.
Page 56, 6 VAC 20-171-260.A.4.	Why maintain qualification scores?	Bill Scouten	Department recommends not incorporating this suggestion. This is not new regulatory language.
Page 57 6 VAC 20-171-260.A.10	Suggest deleting paragraph A.10.	PISA	Department recommends not incorporating this suggestion.
Page 58, 6 VAC 20-171-260.A.18	Exclude training materials from use of seal requirement so instructors can copy materials received in their instructor in-service training to their students.	Charles W. Carey	Make the following change: delete “any (logo)” and replace with “your (logo).”
Page 58, 6 VAC 20-171-	Suggest deleting paragraph	PISA	Have #22 read “not

260.A.18-24	18-24.		violate any state or local ordinances.
Page 59, 6 VAC 20-171-270.A.5-10	Suggest deleting paragraph 5-10.	PISA	Have #8 read “not violate any state or local ordinances.
Page 59, 6 VAC 20-171-270.A.8	Building codes already regulated by state & local ordinance, DCJS does not need to regulate them.	Charles W. Carey	Same changes made to #8 as noted above.
Page 59, 6 VAC 20-171-270.A.8	Recommend remove all references to this, hard for the department to enforce.	Robbie Robertson Training Committee	Same change made as noted above.
Page 61, 6 VAC 20-171-280.A.11-14	Suggest deleting paragraph 11-14.	PISA	Same change should be made to #14 as noted above.
Page 64, 6 VAC 20-171-300.B.5.	Suggest amending to read “A written examination <i>in English</i> ”	PISA	Department recommends not incorporating this suggestion.
Page 64, 6 VAC 20-171-300.B.9.	Suggest adding a 4 th practical exercise.	Robbie Robertson Training Committee	Make recommended change.
Page 65, 6 VAC 20-171-300.C.1	Suggest amending to read “. . .granted a <i>partial exemption to training</i> from the department.”	PISA	Make recommended change.
Page 65, 6 VAC 20-171-300.C.2.	Such training <i>should</i> be completed within 60 days . . Delete last sentence, “Individuals not completing the required training within this period are required to complete the entire training session.	PISA	Department recommends not incorporating this suggestion.
Page 66, 6 VAC 20-171-300.	Add a C.5.- Each individual must have satisfied all judgements	Bill Scouten	Department recommends not incorporating this suggestion.
Page 66, 6 VAC 20-171-300.D.5.	Allow nine hours of firearms classroom instruction per day. Also recommended by the Training committee for general classroom instruction.	Robbie Robertson/Training Committee; Bill Scouten PISA	Make recommended change to include 9 hours per day for both classroom instruction and 9 hours per day for firearms instruction.
Article 3.	Private Security Services Registered Personnel.		

Page 67, 6 VAC 20-171-310.A.2	Supports the change requiring mailing address, phone and email, if applicable	Richard D. Hinkley	Department recommends not incorporating this suggestion.
Page 67, 6 VAC 20-171-310 A.2.	Oppose requirement to change e-mail address with the department within 10 days.	PISA	Department recommends not incorporating this suggestion.
Page 68, 6 VAC 20-171-310 A.3.	Ten days to self-report instead of 30 days is an excellent improvement for this already questionable requirement of self-reporting.	Chris Stuart	No recommended changes.
Page 70, 6 VAC 20-171-320.A.10	Is endorsement meant to read registration or does it refer to the type of weapon qualified with?	Chris Stuart	No recommended changes.
Page 70, 6 VAC 20-171-320.A.10	Why ask for type of action?	Bill Scouten	Make recommended change and delete this reference.
Page 71, 6 VAC 20-171-320.A.14	Oppose inclusion of detective for this requirement	PISA	Department recommends not incorporating this suggestion.
Page 72, 6 VAC 20-171-320.A.23-26	Suggest deleting paragraph 23-26.	PISA	Department recommends not incorporating this suggestion.
Article 4.	Private Security Services Certified Personnel.		
Page 75, 6 VAC 20-171-340-A.9	In conflict with Section 9.1-140 in that the exception do not refer to certified folks only registered	Bill Scouten	No conflict. Department recommends not incorporating this suggestion.
PART V.	COMPULSORY MINIMUM TRAINING STANDARDS FOR PRIVATE SECURITY SERVICES BUSINESS PERSONNEL.		
<i>Regulation Cite</i>	<i>Comments/Issues/Recommendations</i>	<i>Respondent(s)</i>	<i>Agency Response</i>
Article 1.	Registration/Certification		

	Category Requirements.		
Page 77, 6 VAC 20-171-350 B.	Good Job with Entry-Level Training	PIAVA	No recommended changes.
Page 78, 6 VAC 20-171-350.B.	Does this mean if application is submitted within 12 months of training completion date because rosters have a 7-day suspense?	Bill Scouten	Make recommended changes and delete B.
Page 78, 6 VAC 20-171-350.C.	How does this differ from B to C?	Bill Scouten	Make recommended changes delete C and amend B to read "Training will be credited only if application for certification or registration is submitted to the department within 12 months of completion of training".
Page 78, 6 VAC 20-171-350.D	Agree with change, Unarmed Security Officers do not need to be taught arrest laws and procedures.	Richard D. Hinkley	Department recommends not incorporating this suggestion.
Page78, 6 VAC 20-171-350.D.1.	Oppose increased hours from 16 to 18. Will cause increase in school costs, officers cannot afford.	Audrey S. Lipscomb	Department recommends not incorporating this suggestion.
Page78, 6 VAC 20-171-350.D.1.	Security officer core subjects should be 24 hours. Feel security officer training should be 4 – 6 weeks long.	Gordon Passauer	Department recommends not incorporating this suggestion.
Page 79, 6 VAC 20-171-350.C.	Change Course content to E.	Securiguard, Inc PISA	Make recommended change.
Page 80, 6 VAC 20-171-350.C.2.b	Oppose inclusion of 4 hours of range in 14 hours of entry level handgun training. Would prefer (includes dry fire and <i>judgmental and dim light shooting</i> . On Total hours, remove <i>and range qualification</i>	PISA	Make recommended change to include dry fire, judgmental shooting and low level light shooting familiarization.
Page 80, 6 VAC 20-171-350.C.2.b	Can range dry fire and low level lighting training be accomplished in the	Bill Scouten	See recommended change above. Dry fire may be accomplished in

	classroom or must be done at the range?		the classroom if desired. Low level light shooting must be accomplished on the range.
Page 80, 6 VAC 20-171-350.C.2.d	Entry level shotgun training says 1 hour, later, page 95, Paragraph A says 2 hours. Should they agree?	Richard D. Hinkley Bill Scouten	Make recommended change to reflect 2 hours in both sections.
Page 80, 6 VAC 20-171-350.C.2.d	Why is this included in this section?	Bill Scouten	Department recommends not incorporating this suggestion.
Page 80, 6 VAC 20-171-350.C.2.e	Oppose inclusion of 4 hours of range in 14 hours of entry level handgun training. Would prefer (includes dry fire and <i>judgmental and dim light shooting</i> . On Total hours, remove <i>and range qualification</i>	PISA	Make recommended changes as reflected above.
Page 82, 6 VAC 20-171-350.C.5.a.	a. <i>ORIENTATION; Ethics; Professionalism; sound Business Practices; code of Virginia, § 9.1-138 through § 9.1-150; Regulations Relating to Private Security Services, 6 VAC 20-171.</i> Delete all to 8 hours.	PISA	No recommended changes at this time. The recommended curriculum is the result of the JTA conducted along with reviewing material from PISA and working with the training committee on inclusion. However, we will be asking the PSSAB to form a committee to review training material and recommend the learning objectives for PI training. We will ensure that this material is considered.
Page 82-83, 6 VAC 20-171-350.C.6	Where is the requirement for advanced handgun training?	Gary Lewis	No recommended changes. It is located under 20-171-300.
Page 82, 6 VAC 20-171-350.C.5.b.	<i>Law: General; U.S. Constitution and Bill of Rights; court Systems; Criminal Law, Evidence,</i>	PISA	Same as above.

	<p><i>and Procedure: Civil Law, Evidence and Procedure.</i> Delete all to 16 hours plus one practical exercise.</p>		
<p>Page 82, 6 VAC 20-171-350.C.5.c.</p>	<p>Change to: COMMUNICATION SKILLS, INVESTIGATIVE TOOLS & TECHNIQUES: <ol style="list-style-type: none"> 1. Legal Requirements: <ol style="list-style-type: none"> (a) <i>Federal – FOIA, Privacy Act, Fair Credit Reporting Act, Gramm-Leech-Bliley, other pertinent federal laws.</i> (b) <i>Virginia – FOIA, Public Records Act, Privacy Act, other pertinent Virginia laws.</i> 2. Documentation: Notes, Logs, and Reports; Photography; Audio Recordings; Invoicing; Court Testimony; other 3. Interviewing: Setting, Rapport, Formulating Questions, Listening; Recording; Statements; Evaluating Deception; Reporting; other 4. Research: World Wide Web as Investigative Tool; Public Records, Private Information Sources; Forensic Examination; Other 5. Surveillance. 20 hours plus 3 practical exercises </p>	<p>PISA</p>	<p>Same as above.</p>
<p>Page 81, 6 VAC 20-171-350.C.5.</p>	<p>Need to add one practical exercise</p>	<p>Securiguard, Inc</p>	<p>Make recommended changes.</p>
<p>Page 82, 6 VAC 20-171-350.C.5.d.</p>	<p>Delete current curriculum</p>	<p>PISA</p>	<p>Same as above.</p>
<p>Page 82, 6 VAC 20-171-</p>	<p>Change to <i>d</i> reword as</p>	<p>PISA</p>	<p>Same as above.</p>

350.C.5.e.	follows: <i>d. INVESTIGATIVE APPLICATIONS (Choice at the discretion of the Training Director:)</i> accidents, insurance-related; background <i>investigations</i> ; domestic <i>relations</i> ; undercover <i>operations</i> ; fraud and financial; <i>harassment and discrimination, locating persons and property; service of process, technical surveillance countermeasures, criminal defense, and others – 16 hours.</i>		
Page 89, 6 VAC 20-171-360.C.11 c.	Remove records requirement from general instructor training	PISA	Department recommends not incorporating this suggestion.
Page 90, 6 VAC 20-171-360.C.11 d.	Remove techniques of instruction for general instructor training	PISA	Department recommends not incorporating this suggestion.
Page 90, 6 VAC 20-171-360.C.12 a.	Remove Regulations review under Firearms instructor	PISA	Make recommended changes.
Page 90, 6 VAC 20-171-360.C.12 b.	Reword to Techniques of delivery <i>of instruction and other related topics.</i>	PISA	Make recommended changes.
Article 2.	Firearms Training Requirements.		
Page 90, 6 VAC 20-171-365.A	Delete the word “type” duplicate and address characteristics of the firearm (laser sights, tritium sights, integral mounting) There is no requirement for welder goggles? Are the “bold” words a typo”	PIAVA PIAVA	Department agrees to delete the duplicate word type. The department recommends not incorporating the characteristics of the firearm at this time.
Page 90, 6 VAC 20-171-365.A	Delete the type of action altogether because some firearms are not classified by type of action	Bill Scouten	Department will modify this section and will leave Type of Action but we will not list all actions specifically.
Page 90, 6 VAC 20-171-	Add “The proper care,	PISA	Department

370.A.1a.	<i>storage, . . .</i>		recommends not incorporating this suggestion because it is covered in classroom training.
Page 91, 6 VAC 20-171-370.A.1a.	After Total Hours add <i>(including qualification on the range)</i>	PISA	Department recommends not incorporating this suggestion.
Page 91, 6 VAC 20-171-370.B.1	Spell out the equipment needed	PIAVA	Make recommended change.
Page 91, 6 VAC 20-171-370.B.2	Reword: Factory loaded practice or duty ammunition (60 rounds) may be used for range qualification.	PIAVA	Make recommended change.
Page 91, 6 VAC 20-171-370.B.3	This section should mention all three types of actions	PIAVA	Department recommends not incorporating this suggestion. We are deleting the earlier reference.
Page 92, 6 VAC 20-171-370.B.6	Use the same language from 380 D here	PIAVA	Make recommended change.
Page 92, 6 VAC 20-171-370. B.8.	Add a second paragraph <i>“b”Q target: all hits inside the bottle – value 5 points; hits outside the bottle – value 0 points.</i>	PISA	Make recommended change.
Page 92, 6 VAC 20-171-370. B.8&9	Is this really a familiarization course? If a person does not score 75% on this part do they fail the entire course?	Richard D. Hinkley	Department recommends change to reflect that the course is a familiarization course only, no pass or fail grade provided.
Page 92, 6 VAC 20-171-370. B.8&9	If low level not graded, scoring not necessary if graded 9 is not necessary/Add “There is no minimum qualifying score for this course”.	Securiguard, Inc PIAVA	Make recommended change. See above comment
Page 93, 6 VAC 20-171-370.C.2	Include Modified Weaver known as Chapman Why require Weaver stance?	Gordon Passauer PIAVA	Make recommended change to C.1. and C.2.
Page 93-94, 6 VAC 20-171-370.C.3	Delete the type of stance used	Bill Scouten	Department recommends not

	Delete reference to kneeling position not required		incorporating this suggestion.
Page 94, 6 VAC 20-171-370.D	Change duty ammunition to <i>range</i> ammunition.	PISA	Make recommended change with slight modification to “factory loaded practice or duty ammunition.”
Page 94, 6 VAC 20-171-370.D	Why only duty ammunition for low light when other types allowed for full light shooting?	Richard D. Hinkley	Make recommended change.
Page 94, 6 VAC 20-171-370.D	Instructor needs to take more time to coach, dry fire and supervise the students	Gordon Passauer	Department recommends not incorporating this suggestion.
Page 94, 6 VAC 20-171-370.D	For the course written here, you will need 30 rounds of ammunition not 24. Phase 1 says 18 rounds; paragraph D.2 Phase 2 says 12 rounds; opening paragraph says in equipment “24 rounds.”	Charles W. Carey Gary Lewis/ Securiguard/Bill Scouten Richard D. Hinkley	Make recommended change.
Page 94, 6 VAC 20-171-370.D.3	Why delete the use of a flashlight? Necessary because it will probably be in one hand when the security officer has to draw his weapon. Should be taught to shoot holding a flashlight.	Richard D. Hinkley	Department recommends not incorporating this suggestion.
Page 95, 6 VAC 20-171-370.D.3	Delete “KNEELING POSITION MUST USE THE BARRICADE POSITION” not included in the course of fire.	Richard D. Hinkley Bill Scouten	Make recommended change.
Page 96, 6 VAC 20-171-380.C	Increase rounds, 5 at 15 yds, and 5 at 25 yds. Increase distance, require 15 and 25 yds because of different patterns from shotgun	Gordon Passauer	Department recommends not incorporating this suggestion.
Page 98, 6 VAC 20-171-390	Can Personal Protection Specialist be unarmed, or is Advanced handgun required?	Gary Lewis	No recommended change but they may choose to be PPS with or without firearms endorsement.

Page 97, 6 VAC 20-171-390.A.	After 24 hours add (<i>includes qualification on Range</i>)	PISA	Department recommends not incorporating this suggestion. Current language provides more flexibility for the student and school.
Page 98, 6 VAC 20-171-390.B.3	Is there a course for advanced firearms handgun instructor? And should it be 5 students per instructor or 4?	Bill Scouten	We will change the sentence to read “ a certified firearms instructor” but will keep the ratio of 1 instructor per four students.
Article 3.	Security Canine Handler Training Requirements.		
Page 104, 6 VAC 20-171 Article 4 Training Waivers	Add <i>Partial Exemption to Training</i>	PISA	Make recommended change with amendment “Training Exemptions”.
Article 4.	Training Waivers.		
PART VI.	COMPLAINTS, DEPARTMENT ACTION/SANCTIONS, ADJUDICATION.		
Page 106, 6 VAC 20-171-480.A	Last sentence remove manner and the sentence will read. <i>.to provide Private Security Services in a professional and ethical manner, utilizing sound professional business practices.</i>	PISA	Make recommended change
<i>Regulation Cite</i>	<i>Comments/Issues/Recommendations</i>	<i>Respondent(s)</i>	<i>Agency Response</i>
Article 1.	Complaints.		
Article 2.	Department Action/Sanctions		
Article 3.	Adjudication.		
	GENERAL PROPOSED REGULATIONS COMMENTS		
	How will schools notify PSS when a person takes the 8-	Bill Scouten	Unrelated to the regulations but we will

	hour arrest procedure course? Currently we have 01E and 07E but under the proposed regulation a person can take 07E without taking the Arrest procedures part.		assign another category.
	How much lead-time will businesses and schools have to implement the new procedures once they are approved?	Bill Scouten	Department will notify all businesses and schools as soon as the final is submitted.
	Can the Section craft the regulations to ensure that terminating a person based upon written request from the State will meet the VA employment Commission's definition of employee misconduct.	Chris Stuart	Department will forward this suggestion to the PSSAB
	Continue the creation of violators, fined individuals and firms caught doing it right but make them web-based to eliminate mailing costs.	Chris Stuart	Department agrees with this suggestion and it is incorporated in our upcoming Information Bulletin.
	Continue educating the security industry through emails as the Department has during the past several months.	Chris Stuart	This practice will continue.
	Request that members of the PD Section work a day in each of the industries regulated by the department to ensure the section has a solid grounding of the industry.	Chris Stuart	Great suggestion. This is currently going on with DCJS staff and the PSSAB but not in a structured way. We would like to offer this to all employees if we are ever fully staffed again. I will share your idea with the board.
	Frequent reports have been received about individuals at their same addresses, not receiving renewal notices. Has this process been suspended?	Chris Stuart	We send out renewal notices as a courtesy to the address of record.

	Can reciprocal agreements be listed in the regulations and can they be posted on the website.	Chris Stuart	They are included on our website.
	Will the section be reviewing current names and future business license request that include such words as VA, Commonwealth, Law Enforcement, etc. in the title and can be construed to violate the Standards section of the regulations.	Chris Stuart	If the company name is in direct conflict with our regulations we will inform them and request a modification of the business name. We will then verify with SCC that the name was properly changed.
	Can all reference Codes of Virginia be listed in the back of the regulations?	Chris Stuart	We provide the Code of VA when we disseminate the regulations.
	Attendance at unarmed in-service courses might reveal a mundane at best and unbelievable wasteful four-hour experience.	Chris Stuart	Suggest changing provider if you are not satisfied with your in-service training course.
	Please consider the practical application of the hourly requirements as training schools will be forced to implement them. Quality over Quantity	Chris Stuart	Training was developed by Industry Representatives.
	Not sure I like the fee increases but understand.	Richard D. Hinkley	Thanks for your support.
	Would like to see conservator of the peace arrest powers given to previous sworn law officers to work with police departments in an effort to deter crime	Ron Pittman	Stay tuned for new regulations affecting Conservators of the Peace.
	PROPOSED REGULATIONS COMMENTS PUBLIC MEETING 6/12/03 RECOMMENDED CHANGES		
Page 43, 6 VAC 20-171-220.A.19	Line 1, after “carry a” insert “state issued”	CJSB Committee on Training	Make recommended change

Page 50, 6 VAC 20-171-240.A.10.d	Line 1, after “carry a” insert “state issued”	CJSB Committee on Training	Make recommended change
Page 70, 6 VAC 20-171-320.A.8	Line 1, after “private security” insert “state issued” Line 3, after “obtain the” insert “state issued”	CJSB Committee on Training	Make recommended change
Page 75, 6 VAC 20-171-340.A.8	Line 1, after “private security” insert “state issued” Line 3, after “obtain the” insert “state issued”	CJSB Committee on Training	Make recommended change
Page 71, 6 VAC 320.A.14	Line 1, after “officer” delete “ <u>detective</u> ”	CJSB Committee on Training	Make recommended change

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