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Proposed Regulation Agency Background Document

Agency name	Department of Criminal Justice Services
Virginia Administrative Code (VAC) Chapter citation(s)	6VAC20-230 Regulations Relating to Special Conservators of the Peace
VAC Chapter title(s)	6VC20-230-30 Initial Registration Application 6VAC20-230-70 Renewal Registration Application 6VAC20-230-160 Entry-level training 6VAC 20-230-170 In-Service Training 6VAC20-230-180 General firearms training requirements 6VAC 20-230-190 Entry-level handgun training 6VAC 20-230-200 Entry-level shotgun training 6VAC 20-230-210 Firearms (Handgun/Shotgun) Retraining
Action title	Amendments to Compulsory Minimum Training Standards for Special Conservators of the Peace
Date this document prepared	03/03/2022

This information is required for executive branch review and the Virginia Registrar of Regulations, pursuant to the Virginia Administrative Process Act (APA), Executive Order 14 (as amended, July 16, 2018), the Regulations for Filing and Publishing Agency Regulations (1VAC7-10), and the *Form and Style Requirements for the Virginia Register of Regulations and Virginia Administrative Code*.

Brief Summary

Provide a brief summary (preferably no more than 2 or 3 paragraphs) of this regulatory change (i.e., new regulation, amendments to an existing regulation, or repeal of an existing regulation). Alert the reader to all substantive matters. If applicable, generally describe the existing regulation.

This regulatory action, in summary, will be a comprehensive review and update of 6VAC20-230, and also serve as a periodic review, as one has not been conducted in some time. This action will amend and revise the compulsory minimum training standards in 6 VAC20-230, Regulations Relating Special Conservators of the Peace, make technical amendments, and increase the number of training hours required. DCJS' training requirements are established in § 9.1-150.2 of the Code of Virginia, and this

action’s goal is to simplify the regulation of SCOPs itself. Revisions will include the addition of a CPR and first-aid component/training requirement into 6VAC20-230-30 and 6VAC20-230-70. Sections 6VAC20-230-160, 170, 180, 190, 200, and 210 will also be revised as part of this regulatory action, to also amend language, revise firearms training standards and also incorporate a separate document for training standards, for consistency. DCJS maintains that all amendments and revisions will be consistent with those in all other criminal justice professions, and reflect newly-revised, COT-approved compulsory minimum training standards for law enforcement officers, so that the two professions have consistency. The fees associated with SCOPs, under 6VAC20-230-20, are also being amended, but are already incorporated into a separate regulatory package, not related to this one.

Acronyms and Definitions

Define all acronyms used in this form, and any technical terms that are not also defined in the “Definitions” section of the regulation.

- DCJS: Department of Criminal Justice Services
- CJSB: Criminal Justice Services Board, DCJS’ policy board
- COT: Committee on Training
- SCOP: Special Conservator of the Peace
- SCOP CRC: Special Conservator of the Peace Curriculum Review Committee
- DLRS: Division of Licensure and Regulatory Services, a division within DCJS
- PSSAB: Private Security Services Advisory Board
- DIBR: Document Incorporated By Reference
- Department: Department of Criminal Justice Services
- Board: Criminal Justice Services Board
- Division: Division of Licensure and Regulatory Services

Mandate and Impetus

Identify the mandate for this regulatory change and any other impetus that specifically prompted its initiation (e.g., new or modified mandate, petition for rulemaking, periodic review, or board decision). For purposes of executive branch review, “mandate” has the same meaning as defined in Executive Order 14 (as amended, July 16, 2018), “a directive from the General Assembly, the federal government, or a court that requires that a regulation be promulgated, amended, or repealed in whole or part.”

The Special Conservator of the Peace Curriculum Review Committee (CRC), established by the Chairman of the Criminal Justice Services Board, was tasked with identifying and recommending entry-level, in-service and advanced training standards for unarmed and armed SCOPs. The membership of the SCOP CRC consisted of Special Conservators of the Peace, law enforcement (police departments and sheriff’s offices), attorneys, and training academies from across the Commonwealth. Though Board approval was sought and obtained to amend the compulsory minimum training standards for Special Conservators of the Peace in 2018, this regulatory action was never formally initiated due to staff turnover within DCJS and a lack of a regulatory coordinator position for the Private Security division. While there is no current mandate for this regulatory change, the 2015 Session of the General Assembly mandated several of these changes, and was codified in § 9.1- 150.2, but never changed in Administrative Code/DCJS’ regulations. Additionally, as it has not been amended or revised in several years, a comprehensive, periodic review is more than appropriate at this time.

Legal Basis

Identify (1) the promulgating agency, and (2) the state and/or federal legal authority for the regulatory change, including the most relevant citations to the Code of Virginia and Acts of Assembly chapter

number(s), if applicable. Your citation must include a specific provision, if any, authorizing the promulgating agency to regulate this specific subject or program, as well as a reference to the agency's overall regulatory authority.

Pursuant to § 9.1-150.2. Powers of Criminal Justice Services Board relating to special conservators of the peace, the Board shall adopt regulations establishing compulsory minimum, entry-level, in-service, and advanced training standards for special conservators of the peace. The regulations may include provisions delegating to the Board's staff the right to inspect the facilities and programs of persons conducting training to ensure compliance with the law and its regulations. In establishing compulsory training standards for special conservators of the peace, the Board shall require training to be obtained at a criminal justice training academy established pursuant to § [15.2-1747](#), or at a private security training school certified by the Department, and shall ensure the public safety and welfare against incompetent or unqualified persons engaging in the activities regulated by this section. The regulations may provide for exemption from training of persons having previous employment as law-enforcement officers for a state or the federal government. However, no such exemption shall be granted to persons having less than five continuous years of such employment, nor shall an exemption be provided for any person whose employment as a law-enforcement officer was terminated because of his misconduct or incompetence or who has been decertified as a law-enforcement officer. The regulations may include provisions for exemption from such training for persons having previous training that meets or exceeds the minimum training standards and has been approved by the Department. The Board may also adopt regulations that (i) establish the qualifications of applicants for registration; (ii) cause to be examined the qualifications of each applicant for registration; (iii) provide for collection of fees for registration and renewal that are sufficient to cover all expenses for administration and operation of a program of registration; (iv) ensure continued competency and prevent deceptive or misleading practices by practitioners; (v) effectively administer the regulatory system promulgated by the Board; (vi) provide for receipt of complaints concerning the conduct of any person whose activities are regulated by the Board; (vii) provide for investigations, and appropriate disciplinary action if warranted; and (viii) allow the Board to revoke, suspend or refuse to renew a registration, certification, or license for just cause as enumerated in regulations of the Board. The Board shall adopt compulsory, entry-level training standards that shall not exceed, but shall be a minimum of 98 hours for unarmed special conservators of the peace and that shall not exceed, but shall be a minimum of 130 hours for armed special conservators of the peace. In adopting its regulations, the Board shall seek the advice of the Private Security Services Advisory Board established pursuant to § [9.1-143](#).

Purpose

Explain the need for the regulatory change, including a description of: (1) the rationale or justification, (2) the specific reasons the regulatory change is essential to protect the health, safety or welfare of citizens, and (3) the goals of the regulatory change and the problems it's intended to solve.

The proposed regulatory action is essential to protect the health, safety, and welfare of the citizens of the Commonwealth. A Special Conservator of the Peace has the power and authority of arrest and can perform other functions comparable to those of a certified law enforcement officer in Virginia. The current compulsory minimum training standards of an SCOP, however, do not adequately prepare these individuals to perform those functions, nor do they reflect the 2015-mandated training hour increase, as currently listed in § 9.1-150.2. The proposed regulatory action will enhance the SCOPs' ability to properly perform their duties and responsibilities, thus better protecting the health, safety, and welfare of the citizens of the Commonwealth that they may encounter.

Substance

Briefly identify and explain the new substantive provisions, the substantive changes to existing sections, or both. A more detailed discussion is provided in the "Detail of Changes" section below.

In order to determine how the compulsory minimum training standards for special conservators of the peace should be amended to comply with the increased training hour mandate listed in § 9.1-150.2 of the Code of Virginia, the Chairman of the Criminal Justice Services Board established an SCOP CRC. This committee was tasked with identifying and recommending entry-level, in-service, and advanced training standards for SCOPs. DCJS facilitated meetings and the membership of the SCOP CRC consisted of registered SCOPs, certified law enforcement officers, attorneys, and training academy directors and staff. Through multiple meetings, the SCOP CRC was able to develop and enhance the compulsory minimum training standard recommendations which were subsequently approved by the CJSB.

The following substantive changes are proposed for amendment to the 6 VAC20-230, Regulations Relating to Special Conservators of the Peace:

In Section 6 VAC20-230-30, a number 7. And 8. would be added to require that the individual provide documentation of current CPR and First-Aid training and completion.

In Section 6 VAC20-230-70, a number 5. And 6. would be added to require that the individual provide documentation of current CPR and First-Aid training and completion.

In Section 6 VAC20-230-160, the entry-level training hours for an unarmed SCOP are increased from 24 hours to 98 hours and the entry-level training hours for an armed SCOP are increased from 40 hours to 130 hours. The proposed changes also outlines the entry-level curriculum for an unarmed SCOP and an armed SCOP. The proposed changes establishes that each applicant for registration as a SCOP must successfully complete CPR and First Aid training as a pre-qualification requirement.

In Section 6 VAC20-230-170, the in-service training hours for a special conservator of the peace are increased from 8 hours to 12 hours. The proposed changes establishes that the in-service training shall include 4 hours of legal updates & liability issues and 8 hours of career development. The proposed changes also lists subjects from which in-service training must be selected.

In Section 6 VAC20-230-180, the proposed change requires that a registered armed SCOP must successfully complete annual firearms recertification.

In Section 6 VAC20-230-190, the proposed changes require that the entry-level handgun training that an armed SCOP receives must be consistent with that of Virginia law enforcement officers. Qualification courses are also going to be housed within a DIBR within 6VAC20-20-21, once that respective regulatory action is complete (currently still within the Proposed stage), and SCOPs will now be expected to qualify with a 70% score or better, on two of the law enforcement courses of fire.

In Section 6 VAC20-230-200, the proposed changes would repeal and delete the section on entry-level shotgun training, as the Special Conservators of the Peace curriculum review committee was silent on shotgun training for SCOPs. Entry-level training for law enforcement officers does not list shotgun training for new officers either, so the intention is for training to be consistent across criminal justice professions in Virginia.

In Section 6 VAC20-240-210, the proposed changes would delete all references to shotgun retraining.

Issues

Identify the issues associated with the regulatory change, 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, include a specific statement to that effect.

There are no issues, nor disadvantages, associated with the regulatory change that effect individual private citizens, businesses, other agencies within the Commonwealth, or government officials. Advantages of this regulatory change include improved, more efficient mandated training for SCOPs in Virginia.

Requirements More Restrictive than Federal

Identify and describe any requirement of the regulatory change which is more restrictive than applicable federal requirements. Include a specific citation for each applicable federal requirement, and a rationale for the need for the more restrictive requirements. If there are no applicable federal requirements, or no requirements that exceed applicable federal requirements, include a specific statement to that effect.

There are no requirements of this regulatory change that are more restrictive than applicable federal requirements, as there are none associated.

Agencies, Localities, and Other Entities Particularly Affected

Identify any other state agencies, localities, or other entities particularly affected by the regulatory change. "Particularly affected" are those that are likely to bear any identified disproportionate material impact which would not be experienced by other agencies, localities, or entities. "Locality" can refer to either local governments or the locations in the Commonwealth where the activities relevant to the regulation or regulatory change are most likely to occur. If no agency, locality, or entity is particularly affected, include a specific statement to that effect.

There are no other state agencies, localities, or other entities that are particularly affected by this regulatory change.

Economic Impact

Pursuant to § 2.2-4007.04 of the Code of Virginia, identify all specific economic impacts (costs and/or benefits), anticipated to result from the regulatory change. When describing a particular economic impact, specify which new requirement or change in requirement creates the anticipated economic impact. Keep in mind that this is change versus the status quo.

Impact on State Agencies

<p><i>For your agency:</i> projected costs, savings, fees or revenues resulting from the regulatory change, including:</p> <ul style="list-style-type: none"> a) fund source / fund detail; b) delineation of one-time versus on-going expenditures; and c) whether any costs or revenue loss can be absorbed within existing resources 	<p>There are no projected changes in costs, savings, fees, or revenues associated/resulting from this regulatory change, as these amendments are to align training requirements that are already listed in the Code of Virginia.</p>
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<i>For other state agencies:</i> projected costs, savings, fees or revenues resulting from the regulatory change, including a delineation of one-time versus on-going expenditures.	There are no projected costs, savings, fees, or revenues resulting from this regulatory change associated with any other state agencies.
<i>For all agencies:</i> Benefits the regulatory change is designed to produce.	Benefits include the aforementioned improvements to the training standards for new SCOPs employed within the Commonwealth.

Impact on Localities

Projected costs, savings, fees or revenues resulting from the regulatory change.	There are no projected costs, savings, fees, or revenues for localities resulting from this regulatory change.
Benefits the regulatory change is designed to produce.	Localities may benefit by knowing that SCOPs employed within their particular jurisdiction and are receiving enhanced training, thus keeping the community safer, should an incident occur. Otherwise, there is no impact on localities.

Impact on Other Entities

Description of the individuals, businesses, or other entities likely to be affected by the regulatory change. If no other entities will be affected, include a specific statement to that effect.	There is no impact on other entities.
Agency's best estimate of the number of such entities that will be affected. Include an estimate of the number of small businesses affected. Small business means a business entity, including its affiliates, that: a) is independently owned and operated and; b) employs fewer than 500 full-time employees or has gross annual sales of less than \$6 million.	No additional entities will be affected by this regulatory change.
All projected costs for affected individuals, businesses, or other entities resulting from the regulatory change. Be specific and include all costs including, but not limited to: a) projected reporting, recordkeeping, and other administrative costs required for compliance by small businesses; b) specify any costs related to the development of real estate for commercial or residential purposes that are a consequence of the regulatory change; c) fees; d) purchases of equipment or services; and e) time required to comply with the requirements.	There are no projected costs associated that would affect individuals, businesses, or other entities resulting from this regulatory change.
Benefits the regulatory change is designed to produce.	Benefits associated with this regulatory change are enhanced training standards for all SCOPs employed within the Commonwealth of Virginia.

Alternatives to Regulation

Describe any viable alternatives to the regulatory change that were considered, and the rationale used by the agency to select the least burdensome or intrusive alternative that meets the essential purpose of the regulatory change. Also, include discussion of less intrusive or less costly alternatives for small businesses, as defined in § 2.2-4007.1 of the Code of Virginia, of achieving the purpose of the regulatory change.

There are no viable alternatives to this regulatory action. § 9.1-150.2 of the Code of Virginia mandates the training hours specified in the proposed amendments, and authorizes the Criminal Justice Services Board to promulgate regulations effecting the training mandate. The increase in training hours, pursuant to 9.1-150.2 (from 24 to 98 hours for unarmed SCOPs and 40 to 130 hours for armed SCOPs) was mandated by the 2015 Session of the General Assembly, in Chapter 766. This regulatory change reflects the required Code change, so that the two align, as well as revises the compulsory minimum training standards to align with that of other criminal justice professions.

Regulatory Flexibility Analysis

Pursuant to § 2.2-4007.1B of the Code of Virginia, describe the agency’s analysis of alternative regulatory methods, consistent with health, safety, environmental, and economic welfare, that will accomplish the objectives of applicable law while minimizing the adverse impact on small business. Alternative regulatory methods include, at a minimum: 1) establishing less stringent compliance or reporting requirements; 2) establishing less stringent schedules or deadlines for compliance or reporting requirements; 3) consolidation or simplification of compliance or reporting requirements; 4) establishing performance standards for small businesses to replace design or operational standards required in the proposed regulation; and 5) the exemption of small businesses from all or any part of the requirements contained in the regulatory change.

Pursuant to § 2.2-4007.1(B) of the Code of Virginia, DCJS maintains there are no alternative regulatory methods that will accomplish the objectives of applicable law while minimizing the adverse impact on small businesses, because this regulatory change will not affect other entities or localities other than certified SCOPs in Virginia.

Periodic Review and Small Business Impact Review Report of Findings

If you are using this form to report the result of a periodic review/small business impact review that is being conducted as part of this regulatory action, and was announced during the NOIRA stage, indicate whether the regulatory change meets the criteria set out in Executive Order 14 (as amended, July 16, 2018), e.g., is necessary for the protection of public health, safety, and welfare; minimizes the economic impact on small businesses consistent with the stated objectives of applicable law; and is clearly written and easily understandable.

In addition, as required by § 2.2-4007.1 E and F of the Code of Virginia, discuss the agency’s consideration of: (1) the continued need for the regulation; (2) the nature of complaints or comments received concerning the regulation; (3) the complexity of the regulation; (4) the extent to which the regulation overlaps, duplicates, or conflicts with federal or state law or regulation; and (5) the length of time since the regulation has been evaluated or the degree to which technology, economic conditions, or

other factors have changed in the area affected by the regulation. Also, discuss why the agency's decision, consistent with applicable law, will minimize the economic impact of regulations on small businesses.

DCJS is utilizing the promulgation of this regulatory change to serve as a comprehensive periodic review of the regulation, as one has not been conducted in some time. This was announced during the NOIRA stage. The agency has considered the continued need for this regulation and its necessity for the protection of public health, safety, and welfare, and has determined that this regulation is crucial to all SCOPs in the Commonwealth. The regulation is clearly written and easily understandable, while maintaining no impact on small businesses or outside entities. 6 VAC20-230 does not overlap nor duplicate any federal or other state law or regulation, and any amendments made only enhance the training for SCOPs. DCJS maintains that this regulatory change benefits not only SCOPs, but the general welfare and safety of the public, as well.

Public Comment

Summarize all comments received during the public comment period following the publication of the previous stage, and provide the agency response. Include all comments submitted: including those received on Town Hall, in a public hearing, or submitted directly to the agency. If no comment was received, enter a specific statement to that effect.

12 comments were received during the previous regulatory stage, and a few (by the same individuals) were received via email directly to the agency. DCJS understands that most of these comments are coming from the same agency/organizations, and in summary, many current SCOPs are objecting to the increase in training hours and overall changes, although the majority of these changes were mandated by the 2015 General Assembly (and just never revised in Administrative Code). Full comments detailed at the end of this document.

Commenter	Comment	Agency response
Kevin Hoffman	Opposes any change to SCOP training requirements.	Agency response to all of these comments has been to inform the public, as well as DCJS' constituents, of the regulatory process. Additionally, it is imperative to understand that § 9.1-150.2 of the Code of Virginia mandates the training hours specified in the proposed amendments, and authorizes the Criminal Justice Services Board to promulgate regulations effecting the training mandate. The increase in training hours, pursuant to § 9.1-150.2 (from 24 to 98 hours for unarmed SCOPs and 40 to 130 hours for armed SCOPs) was mandated by the 2015 Session of the General Assembly, as enumerated in Chapter 766. This regulatory change reflects that required Code change, so that the two align, as well as revises the compulsory minimum training standards to align with that of other criminal justice professions. DCJS staff turnover and lack of a regulatory coordinator for the Private Security division is the cause for the delay in the promulgation of these regulatory changes.

Florian E. Stachura	Opposes changes to training, believes it to be a waste of money.	“ “
Maurice Neblett	Opposes changes to firearms training requirements.	“ “
Charles Law	Believes changes will add additional burden on agencies.	“ “
Frederic Pleasants, Jr.	Advised the PSSAB wanted to voice concerns and objections to the COT in 2018, but their concerns were never addressed and were ignored; Opposes changes, especially since the 2018 Session of the General Assembly removed SCOPs’ authority to use “police” on badges, vehicles, etc.; Believes the associated costs will be overly burdensome and that SCOPs do not need law enforcement firearms training.	“ “
Edward Andrews	Opposes changing firearms training requirements.	“ “
Orlando L. Irving	Advised SCOPs operate as a security function rather than law enforcement even though they are appointed and sworn; Not in favor of changing firearms requirements.	“ “
Stacy Sumner	Advised changes to firearms would mean additional costs for ammunition and range fees and cause strain on staffing to meet the new training requirements; Recommended the continued use of the Private Security firearms courses.	“ “
Dennis P. Dahlin	Believes changes will results in getting rid of the SCOP program; Advised the proposed changes are unrealistic and wants to continue to utilize the private security firearms course.	“ “
A. Michael Scott	Advised SCOPS work in a security role and that new training is unnecessary; Believes it will increase the cost of the program and impact staffing due to increased training times/requirements.	“ “
Virginia Museum of Fine Arts	Opposes regulatory changes to SCOP firearms regulations; Wishes to keep PSS training requirements.	“ “
Michael Goode	Advised SCOPs are employed in a security function; Changes would mean additional ammunition and range costs; Wants to keep training as-is.	“ “

Public Participation

Indicate how the public should contact the agency to submit comments on this regulation, and whether a public hearing will be held, by completing the text below.

The Department of Criminal Justice Services is providing an opportunity for comments on this regulatory proposal, including but not limited to (i) the costs and benefits of the regulatory proposal, (ii) any alternative approaches, (iii) the potential impacts of the regulation, and (iv) the agency's regulatory flexibility analysis stated in that section of this background document.

Anyone wishing to submit written comments for the public comment file may do so through the Public Comment Forums feature of the Virginia Regulatory Town Hall web site at: <https://townhall.virginia.gov>. Comments may also be submitted by mail, email or fax to Kristi Shalton, 1100 Bank St, Richmond, VA 23219, (804) 786-7801, (804) 786-0410 (fax), or kristi.shalton@dcjs.virginia.gov. In order to be considered, comments must be received by 11:59 pm on the last day of the public comment period.

A public hearing will not be held following the publication of this stage of this regulatory action.

Detail of Changes

List all regulatory changes and the consequences of the changes. Explain the new requirements and what they mean rather than merely quoting the text of the regulation. For example, describe the intent of the language and the expected impact. Describe the difference between existing requirement(s) and/or agency practice(s) and what is being proposed in this regulatory change. Use all tables that apply, but delete inapplicable tables.

If an existing VAC Chapter(s) is being amended or repealed, use Table 1 to describe the changes between existing VAC Chapter(s) and the proposed regulation. If existing VAC Chapter(s) or sections are being repealed and replaced, ensure Table 1 clearly shows both the current number and the new number for each repealed section and the replacement section.

Table 1: Changes to Existing VAC Chapter(s)

Current chapter - section number	New chapter-section number, if applicable	Current requirements in VAC	Change, intent, rationale, and likely impact of new requirements
230-60	N/A	A. Individuals are required to be registered pursuant to § 19.2-13 of the Code of Virginia in the category of special conservator of the peace. Prior	Changes to this section would add in a number 7. and 8. under C., requiring that individuals provide documentation of current CPR training and current First Aid training completion.

		<p>to the issuance of a registration, the applicant shall meet or exceed the requirements of registration and application submittal to the department as set forth in this section. Individuals who carry or have access to a firearm while on duty must have a valid registration with firearms verification. The court may limit or prohibit the carrying of weapons by any special conservator of the peace as defined in § 19.2-13 G of the Code of Virginia.</p> <p>B. Each person applying for registration shall meet the minimum requirements for eligibility as follows:</p> <ol style="list-style-type: none">1. Be a minimum of 18 years of age;2. Successfully complete all initial training requirements for special conservator of the peace, including firearms verification if applicable, requested pursuant to the entry-level training standards in 6VAC20-230-160; and3. Be a United States citizen or	
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		<p>legal resident alien of the United States.</p> <p>C. Each person applying for registration shall file with the department:</p> <ol style="list-style-type: none">1. A properly completed application provided by the department;2. His mailing address on the application;3. Fingerprint cards pursuant to 6VAC20-230-40;4. The applicable, nonrefundable application fee;5. A drug and alcohol test pursuant to 6VAC20-230-50;6. Pursuant to § 19.2-13 D of the Code of Virginia, documentation verifying that the applicant has secured a certificate of insurance reflecting the department as a certificate holder, showing a policy of professional law-enforcement liability insurance with a minimum coverage of \$500,000 issued by an insurance company authorized to do business in Virginia <p>D. Upon completion of the initial registration</p>	
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	<p>application requirements, the department may issue a temporary registration letter for not more than 120 days at a time while awaiting the results of the state and national fingerprint search provided the applicant has met the necessary conditions and requirements. This temporary registration letter shall be taken to the circuit court where seeking appointment for special conservator of the peace.</p> <p>E. Each registration shall be issued to the individual named on the application and shall be valid only for use by that individual. No registration shall be assigned or otherwise transferred to another individual.</p> <p>F. Each registered individual shall comply with all applicable administrative requirements and standards of conduct and shall not engage in any acts prohibited by applicable sections of the Code of Virginia and this chapter.</p> <p>G. Once the individual has met the requirements and received a</p>	
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		<p>temporary registration letter, he shall petition the circuit court for appointment in the jurisdiction where the individual will be employed.</p> <p>H. Meeting the requirements of registration allows an individual to be eligible for appointment. Registration does not guarantee appointment.</p> <p>I. Upon completion of an appointment by a circuit court, the individual shall file with the department a copy of the court order granting appointment as a special conservator of the peace. A final registration letter will be issued by the department. This registration letter shall be submitted to a specified entity for a state-issued photo identification card.</p>	
230-70	N/A	<p>A. Applications for registration renewal should be received by the department at least 30 days prior to expiration. The department will provide a renewal notification to the last known mailing address of the registered individual. However, if the individual does not receive a</p>	<p>Changes to this section would add in a number 5. And 6. under C., requiring that individuals provide documentation of current CPR training and current First Aid training completion.</p>

		<p>renewal notification, it is the responsibility of the individual to ensure that renewal requirements are filed with the department. Registration renewal applications received by the department after the expiration date shall be subject to all applicable, nonrefundable renewal fees plus reinstatement fees.</p> <p>B. Each person applying for registration renewal shall meet the minimum requirements for eligibility as follows:</p> <ol style="list-style-type: none">1. Successfully complete the in-service training, and firearms retraining if applicable, pursuant to the in-service training requirements set forth by this chapter; and2. Be in good standing in every jurisdiction where appointment is granted. This subdivision shall not apply to any probationary periods during which the individual is eligible to operate under the registration. <p>C. The department may renew a</p>	
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	<p>registration when the department receives the following:</p> <ol style="list-style-type: none"> 1. A properly completed renewal application provided by the department; 2. The applicable, nonrefundable registration renewal fee; 3. Fingerprint card, application form, and applicable nonrefundable fee pursuant to 6VAC20-230-40; 4. A copy of the court order granting special conservator of the peace authority and jurisdiction if changed from the original filed with the department; <p>D. Upon completion of the renewal registration application requirements, the department may issue a registration letter for a period not to exceed 12 months. This registration letter shall be submitted by the applicant to a specified entity for a state-issued photo identification card, or a decal will be provided by the department.</p> <p>E. Any renewal application received</p>	
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		<p>by the department shall meet all renewal requirements prior to the expiration date of a registration or shall be subject to the reinstatement requirements set forth in 6VAC20-230-90.</p>	
<p>230-160</p>	<p>N/A</p>	<p>Currently, 6VAC20-230-160 lists training requirements for unarmed special conservators of the peace at 24 hours and armed at 40 hours. The current regulation details the requirements (and hours) by category.</p>	<p>Entry-level training hours for an unarmed SCOP are increased from 24 hours to 98 hours and the entry-level training hours for an armed SCOP are increased from 40 hours to 130 hours, which was mandated in the 2015 Session of the General Assembly, in Chapter 766. The proposed changes also outline the entry-level curriculum for an unarmed SCOP and an armed SCOP. The proposed changes establishes that each applicant for registration as a SCOP must successfully complete CPR and First Aid training as a pre-qualification requirement (which is not currently a requirement).</p> <p>C. will now read:</p> <p>The entry-level training course content by category, excluding range qualification, shall be as provided in this subsection.</p> <ol style="list-style-type: none"> 1. Unarmed special conservator of the peace. The entry-level curriculum for unarmed special conservator of the peace sets forth the following areas identified as: <ol style="list-style-type: none"> a. Orientation on Special Conservators of the Peace Laws and Regulations 4 hours b. Basic Laws 12 hours c. Virginia Crimes 8 hours d. Legal Procedures/Due Process 22 hours e. Use of Force and Liability Issues 20 hours f. Patrol Techniques 16 hours g. Personal Safety – Defensive Tactics and Survival 16 hours

<p>230-170</p>	<p>N/A</p>	<p>A. Each person registered with the department as a special conservator of the peace by the department shall complete the compulsory in-service training standard once during each 12-month period of registration. In-service training must be completed within 12 months prior to the expiration date.</p> <p>B. The in-service training hour requirement by category, excluding examinations, practical exercises and range qualification, shall be as follows:</p> <ol style="list-style-type: none"> 1. Special conservators of the peace – 8 hours 2. Firearms requalification, if applicable. <p>C. The in-service training course content by category, for special conservator of the peace excluding examinations, practical exercises and range qualification shall be as follows:</p> <ol style="list-style-type: none"> 1. Legal authority – 4 hours 2. Job-related training – 4 hours 	<p>The in-service training hours for a special conservator of the peace are increased from 8 hours to 12 hours in this section. The proposed changes establishes that the in-service training shall include 4 hours of legal updates & liability issues and 8 hours of career development. The proposed changes also lists subjects from which in-service training must be selected.</p>
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		Total hours – 8 hours	
230-180	N/A	Currently, under the general firearms training requirements, a registered armed SCOP shall: (i). Successfully pass the entry-level handgun training and (ii). Maintain a valid firearms verification.	Amended section requires that a registered armed SCOP must successfully complete annual firearms recertification, in addition to successfully passing the entry-level training and maintaining a valid firearms verification.
230-190	N/A	<p>Currently, this section details entry-level handgun training, to include listing specific firearms qualification courses. More specifically:</p> <p>A. Handgun classroom training.</p> <p>1. The entry-level handgun classroom training will include but not be limited to the following:</p> <ul style="list-style-type: none"> a. Proper care and maintenance of the firearm; b. Civil liability of the use of firearms; c. Criminal liability of the use of firearms; d. Firearms retention and storage; 	<p>The proposed changes require that the entry-level handgun training that an armed SCOP receives must be consistent with training objectives required of Virginia law enforcement officers (as enumerated in 6VAC20-20-21). Current Committee on Training-approved standards can be found on DCJS’ website at https://www.dcjs.virginia.gov/sites/dcjs.virginia.gov/files/law-enforcement/weaponsusefirearms.pdf, which lists the specific courses of fire and targets that SCOPs will need to qualify on/with. These will also be specifically listed within a DIBR within 6VAC20-20-21, once that respective regulatory action is complete.</p> <p>Additionally, under B. Range qualification, the “no minimum hours” will be removed and will now incorporate these revisions:</p> <p>B. Range qualification. The purpose of the range qualification course is to provide practical firearms training to individuals desiring to become armed special conservators of the peace.</p> <p>1. Range qualification training will include but not be limited to the following:</p> <ul style="list-style-type: none"> a. 28 hours of range training for one handgun; b. Fire a minimum of 200 rounds of ammunition in daylight conditions prior to qualification c. Choice of two department-approved law enforcement qualification courses (found within 6VAC20-20-21); and d. A qualification score of 70% or better.

		<p>e. Deadly force;</p> <p>f. Justifiable deadly force;</p> <p>g. Range safety;</p> <p>h. Principles of marksmanship;</p> <p>i. Practical firearms handling and safety;</p> <p>j. Judgmental shooting; and</p> <p>k. Low-level light shooting familiarization.</p> <p>Total Hours (excluding written examination) – 16 hours</p> <p>2. Written examination required.</p>	
<p>230-200</p>	<p>N/A</p>	<p>As well as detailing current shotgun courses for qualification purposes, this section states:</p> <p>A. Shotgun classroom training. The entry-level shotgun classroom instruction will emphasize but not be limited to:</p> <p>1. Safe and proper use and handling of the shotgun;</p>	<p>The proposed changes to this section will delete the entry-level shotgun training, as the Special Conservators of the Peace Curriculum Review Committee was silent on shotgun training for SCOPs. Additionally, there are not minimum training standards for entry-level law enforcement shotgun training, as many departments and agencies are not equipped with shotguns. The overarching goal is to align the professions, so this entire section will be repealed.</p>

		<p>2. Nomenclature;</p> <p>3. Positions and combat loading techniques;</p> <p>4. Decision-making for the officer with the shotgun;</p> <p>5. Transition from sidearm to shotgun; and</p> <p>6. Shotgun retention and proper use of a sling.</p> <p style="text-align: center;">Total hours – 2 hours</p> <p>B. Range qualification (no minimum hours). The purpose of the range-firing course is to provide practical shotgun training to those individuals who carry or have immediate access to a shotgun in the performance of their duties.</p> <p>1. For certification, 12 gauge, double aught "00" buckshot ammunition shall be used. Five rounds.</p> <p>2. Scoring – 70% of available pellets must be within silhouette.</p>	
230-210	N/A	Currently, all armed special conservators of the peace must satisfactorily	The proposed changes will delete all references to shotgun retraining, but the rest of this section would remain as-is.

	<p>complete two hours of firearms classroom training or practical exercises and range training, and requalify as prescribed in <u>6VAC20-230-190</u> for handgun and <u>6VAC20-230-200</u> for shotgun, if applicable, on an annual basis prior to the issuance of the firearms verification, as follows.</p> <ol style="list-style-type: none"> 1. Classroom retraining or practical exercises – 2 hours 2. Range qualification with handgun and/or shotgun, if applicable (no minimum hours) <p>Total hours (excluding range qualification) – 2 hours</p>	
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If a new VAC Chapter(s) is being promulgated and is not replacing an existing Chapter(s), use Table 2.

Table 2: Promulgating New VAC Chapter(s) without Repeal and Replace

New chapter-section number	New requirements to be added to VAC	Other regulations and laws that apply	Change, intent, rationale, and likely impact of new requirements

If the regulatory change is replacing an **emergency regulation**, and the proposed regulation is identical to the emergency regulation, complete Table 1 and/or Table 2, as described above.

If the regulatory change is replacing an **emergency regulation**, but changes have been made since the emergency regulation became effective, also complete Table 3 to describe the changes made since the emergency regulation.

Table 3: Changes to the Emergency Regulation

Emergency chapter-section number	New chapter-section number, if applicable	Current <u>emergency</u> requirement	Change, intent, rationale, and likely impact of new or changed requirements since emergency stage

**** Full comments received during NOIRA stage:**

Commenter: Kevin Hoffmann

SCOP Officer Changes

I have been a SCOP officer at VMFA for approximately 4.5 years. Prior to that I retired on a compensable disability pension due to line of duty injuries sustained at the Richmond Police Department. I was there for approximately 10 years including an assignment with ATF on the Project Exile Task Force. I was there for about 16 months. Based on all my training and experience with law enforcement I see absolutely no reason to make any changes regarding the SCOP training. It is unnecessary and would be a waste of time, money, and resources. Why try to fix something that isn't broken?

Commenter: Florian E.Stachura

Pending changes to the SCOP Training Curriculum proposed by Criminal Justices Services Board

I am a retired City of Richmond Police Detective of 28+ years service, followed by 8+ yrs. service to Sheriff of Richmond City. Following that I entered into service as a SCOP/Police Officer with the Richmond Metropolitan Transportation Authority part time, as well as a SCOP/Police Officer part time with the Security Section of the Virginia Museum of Fine Arts. In all these jobs starting in 1978 Graduation from Richmond Basic Police Academy I performed my jobs with profession .I was required to qualify yearly with my service weapons issued by these jobs as well as attend 40 hr mandated service every two years which I attended with due diligence. Since the SCOP program has unnecessarily been stripped of its Police authority, Training has continued successfully under the private security format and firearms training level which in my experience of over forty years of service and training it seems that the people on this have no real idea how hard the instructors efficiently train the VMFA Officers. It would be a waste of time and training funds to require what is already more than sufficient for standard private security officers, which is what SCOP has been reduced to, thanks to the Sheriffs, Police Chiefs and the DCJS. So, I disagree with any decision to change what training already provides better than adequate representative SCOP Officers fulfilling their private security requirements for the VMFA and the State of Virginia. Don't waste the money on bullets and our time with family and keep our training on a steady track and professionalism.

Commenter: Maurice Neblett

Special conservator of the peace proposed regulation change for firearms training requirements

I am a special conservator of the peace (SCOP) with VMFA. I've been registered as an SCOP for nearly one year now. I am a Security technician, I have studied the criminal justice system, I've held arrest authority for many years prior to Joining VMFA, I have been a security officer for over 6 years.I have successfully completed the entry-level firearms course that, I am now due to re-qualify for with a handgun as a security professional. I believe that the fire arms training provided by DCJS certified instructors at the vmfa provides us with high abilities that fit our role as SCOPs'.

I am confident in my abilities if necessary to engage with all safety precautions and proficiency while using a firearm. I enjoy providing security at the VMFA knowing that the public can enjoy themselves in a safe secure environment. As security professionals we observe, report and support local law-enforcement if necessary at their request. I am not in favor of changing the fire arms training requirements. The private security firearms course requirements should remain as the standard requirement for the SCOP program. Whether if it's title changes or qualification changes the character of the security professional is a prerequisite and with that discretion results right or wrong in the color of law.

Commenter: Charles Law, Dept of Behavioral Health and Developmental Services

Comments on enhanced training requirements for SCOP

The Dept of Behavioral Health utilizes a hybrid approach to security and law enforcement on our facility campuses. We partner with the VSP, local law enforcement, employ SCOP and security staff as well as embedded hybrid care/security staff into each patient area.

We operate a DCJS Certified Training Academy to assure our staff are trained to the highest standards and in a quality manner across our system using DCJS audited materials and policy.

To dramatically increase training requirements adds time which will equate to more positions to train our systems staff, it adds days of travel to our centralized training academy and a plethora of small costs. As mentioned by other state agencies, our jobs in state agencies is not to be a "street cop". In our case, its patient care - the safety of individuals committed to state hospitals and training centers. We also have a dual mission to protect our staff from workplace violence. We call in the most skilled units of VSP and a nationally certified local law enforcement partner when the "right tool" is needed to perform those extreme risk duties. We have an excellent relationship with law enforcement professionals to handle the toughest and most dangerous situations like active shooter, etc.

We will follow the regulations if adopted, and we will perform them to the letter. However, is this action evoking the intended results or is it innocently adding burdens to partner agencies across the Commonwealth in a manner bringing unintended cost and consequences?

Commenter: Frederic Pleasants, Jr.

PROPOSED REGULATORY CHANGES TO THE SPECIAL CONSERVATOR OF THE PEACE PROGRAM

I'd like to begin by stating my professional background. I was in law enforcement for 36 years (the last six as a Chief of Police). Upon retiring from law enforcement, I was appointed the Manager of Security Services at the Virginia Museum of Fine Arts, a position I held until November, 2018, when I retired. Beginning in 2014, I was asked by DCJS to participate on several task forces whose purpose was to examine the current Special Conservator of the Peace program in Virginia. It seems that the Virginia Association of Chiefs of Police was very upset about several components of the program. Over the next two years, many changes to the program were submitted to the General Assembly, and ultimately approved. These changes involved new registration procedures, new application procedures for Court Orders of Appointment, new background investigation requirements, and ultimately, changes to the training required to be a SCOP. The General Assembly approved increasing the minimum number of hours of training (both legal training and firearms training). The next step was to determine exactly what the new curriculum would be. DCJS established a Curriculum Review Committee. I was asked to participate on this committee, along with TWO other members of the private security industry. Numerous individuals from the law enforcement community were selected to serve on the committee. During the remainder of 2015, and all of 2016, the committee met on numerous occasions to develop the new curriculum. Reaching consensus on the legal curriculum was fairly easy. In most cases, we just recommended increasing the subject area hours. We then proceeded to the new Firearms requirements. During this process, there was a robust discussion. The members from the law enforcement

community were emphatic that SCOP officers must qualify on a Law Enforcement Firearms program. They based this on the fact SCOP's could use the term POLICE on their patches, badges and vehicles. They had been advocating at the General Assembly for the past two years for the removal of this benefit, but had not been successful. By the overwhelming influence of their numbers on the committee, they were able to change the firearm regulations for SCOP officers to that of Law Enforcement Officers. The new recommendations now went to the Training Committee of the Criminal Justice Services Board, and ultimately to the Board. At their meeting on May 10, 2018, the Chair expressed her desire for input from the Private Security Services Advisory Board. At that time I was a member of the PSSAB, representing the SCOP industry in Virginia. At our June 6, 2018 meeting, we voted to voice our objection to the proposed Firearms Regulations, to the CJSB. They chose not to address any of those concerns.

Now, the interesting part. These new proposed regulations were then supposed to enter the regulatory development phase. It took over THREE years for this to be accomplished. A quick approval process was begun in December, 2021. Those approvals bring us to where we are today - the public comment period.

I will limit my comments solely to the necessity to change the Firearms Regulations to that of law enforcement. It should be noted that the 2018 session of the General Assembly removed the authority of SCOP officers to use the term POLICE on their badges, patches or vehicles. This alone removed, or invalidated, the law enforcement communities' justification in changing the Firearms Regulations from Private Security training to Law Enforcement training. The Special Conservator of the Peace program is managed by the Private Security Services Section of DCJS. It is a "security" program, not a law enforcement program. Some at DCJS and the CJSB have stated the SCOPs need increased firearms training because they have the authority to make arrests. I cannot find even a causal connection between these two issues. In fact, certain Armed Security Officers (with only 8 hours of training) can affect arrests. They only need to comply with Private Security firearms training. Finally, the actual impact of these regulatory changes on the SCOP industry will be significant. To comply with both components of the changes (legal & firearms) will require extensive classroom and range training time. Many private security businesses and individual entities will find it impossible to comply. There will be significant increases in expenses to purchase additional ammunition, secure ranges that can accommodate the new qualification courses, and pay overtime to backfill positions while officers attend this training.

Finally, I am respectfully requesting that the firearm regulations for Special Conservators of the Peace remain within the Private Security Services regulations. I see no detriment to this, nor will it decrease the safety and protection to the public. During all of our deliberations over years, not one incident of poor firearms proficiency or lack of appropriate training was presented to the any of the committees by DCJS. I served in both the Law Enforcement & Private Security industries for many years. I am accutely aware of, and respect, the training needed for police officers and security officers. SCOP Officers do not need law enforcement firearms training.

Commenter: Edward Andrews, Virginia Museum of Fine Arts

Proposed Changes to SCOP Training Requirements

My name is Edward Andrews and I have been registered as a SCOP Officer with the VMFA since April of 2021. I believe that my successful completion of an Entry Level Firearms Course based on private security regulations was more than sufficient for my duties at the VMFA since I provide a security function and not a law enforcement function. With the training I received, I am confident in my ability to use a firearm if necessary, and therefore not in favor of changing the firearms training requirements. I would prefer to see SCOP Officers continue to qualify on private security courses. Thank you for your time and consideration.

Commenter: Virginia Museum of Fine Arts

Proposed regulatory changes as it relates to 9411

I am Cpt. Orlando L. Irving, currently employed as a Registered Armed Special Conservator of the Peace (SCOP) at the Virginia Museum of Fine Arts. I've been with the museum 10 of the last 12 years. My position here is the Safety and Security Coordinator, designated Compliance Agent and Firearms Instructor. I have previously completed the Entry Level Firearms Course some years ago, and I have successfully completed the annual requalification session based on the Private Security Services (PSS) regulations for handgun course every since.

I personally feel that I am very confident in the quality of my training, in so much that, I have regularly training DCJS registrants using my instructor certifications on both the PSS and SCOP areas of training. I am very familiar with DCJS training in that I am also an Armed Security Officer registrant and a certified General Instructor.

At the VMFA, which is a state agency, we operate as a **security function** and we are not a law enforcement entity, even though we are appointed and sworn. The current PSS course of fire is more than adequate for the security service we provide as SCOPs. "Forcing" us as a security function to comply with law enforcement standards, would place an inordinate burden on our agency, and other SCOP entities with similar functions. As a trainer, I'm all for the increased training, although in this case, there would be a significant cost accrued for very expensive ammo, training time would increase consequentially, and training venues for tactical firearms training are very limited. Based on these factors and the years of training required to elevate from a security firearms qualification to a law enforcement qualification level, I am not in favor of changing the firearms training requirements. Doing so would adversely affect the SCOP program, and effectively render it unattainable. I am requesting that the SCOP officers continue to utilize the PSS course of fire and the current handgun training course.

Commenter: Stacy Sumner

Proposed Regulatory Changes to the Special Conservator of the Peace Program

My name is Stacy Sumner and I am the Manager of Security Services at the Virginia Museum of Fine Arts. I have been with the VMFA for 12 years and a SCOP Officer for 10 of those years. Our SCOP program provides security to the facility 24 hours a day, 365 days a year. The VMFA is one of the top 10 fine arts museums in the nation, which further proves the vital need for the highest level of security. We are a state funded facility with budget restrictions like any other state funded agency. With these new regulations, the impact on our budget and staffing would be devastating. With additional costs for ammunition and range fees for two different firearm ranges, and also the strain on our staffing to require every officer to meet these new training requirements, these new regulations would be unrealistic to match and ones that simply cannot be accomplished with normal or even exceptional effort. I am not in favor of changing the firearms training requirements and I strongly recommend that our SCOP Officers continue to utilize the Private Security firearms courses.

Commenter: Dennis P. Dahlin

Proposed Regulation changes for SCOP

I am a DCJS certified instructor for SCOP and for Firearms. Have been for over 23 years. If DCJS is trying to get rid of the SCOP program, then I think these proposed changes will accomplish that. I feel the program has been abused in the past (the word Police and Blue lights, etc,.) but they are some of the most trained personnel you have on the streets in Virginia (not counting the Police). Is Law Enforcement trying to force-fill their depleted ranks with former SCOP's? Why would any SCOP stay a SCOP after qualifying for the Police? Why the changes? I haven't heard of a SCOP shooting anybody. But, if you must make a change, I suggest the Armed SCOP qualify twice in a year before they get a card. Let them have a Letter until the second qualification then issue a card. This will still be cheaper for the SCOP but will hopefully keep proficiency levels up. Or maybe add 09E as the "second" firearm requirement.

ur staffing to require every officer to meet these new training requirements, these new regulations would be unrealistic to match and ones that simply cannot be accomplished with normal or even exceptional effort. I am

not in favor of changing the firearms training requirements and I strongly recommend that our SCOP Officers continue to utilize the Private Security firearms courses.

Commenter: A. Michael Scott

PROPOSED CHANGES TO THE REGULATIONS REGARDING THE SPECIAL CONSERVATOR OF THE PEACE PROGRAM

I am currently an Armed Special Conservator of the Peace at the Virginia Museum of Fine Arts, and have been for eight years. I am also a Watch Commander and supervise other SCOP officers. Prior to this I was a sworn police officer with the Richmond Police Department for 30 years. In that role I had to qualify yearly on a law enforcement firearm course. I did this and had excellent scores on these courses. Upon transitioning to the SCOP program, I had to qualify on an approved Private Security Services firearms course. I did this and again produced excellent scores. Based on my experience, I am certainly aware of the firearm proficiency needs of police officers, AND of individuals working in the private security industry. I can assure you that these needs are not the same. Individuals employed as SCOP officers work solely in a security role, which is limited in exposure and jurisdiction. The current private security firearms training and qualification course is extensive and appropriate for the role of SCOP officers. In my opinion, converting them to a law enforcement firearms training program is unnecessary. It will increase the cost of the program and impact our staffing due to increased training times, without producing measurable positive results from this enhanced firearms training. I would request that the firearm training requirements for Armed Special Conservators of the Peace be retained as they currently exist under Private Security Services (DCJS).

Commenter: Virginia Museum of Fine Arts

PROPOSED REGULATORY CHANGES TO THE SPECIAL CONSERVATOR OF THE PEACE PROGRAM

I am currently employed as an Armed Special Conservator of the Peace at the Virginia Museum of Fine Arts in the Security Services Department. I am also a Watch Commander and supervise other officers. Prior to this I was an armed police officer for six years. I have had to complete both a law enforcement firearms course along with a private security firearms qualification course. I am acutely aware of the firearms training requirements and the need for them for both industries. I have successfully qualified with a firearm for the past 11 years, conforming to the established private security services regulations established by the Department of Criminal Justice Services. I am absolutely aware that police officers require a higher level of proficiency with weapons than do members of the private security community. However, the firearms course that we utilize in private security is intense and certainly prepares us for our role as a security function. As one who has participated in BOTH firearms programs, I do not believe that it is feasible or necessary to require SCOP officers to now qualify under a law enforcement firearm course. These requirements are excessive, will impose additional expense to our agency, and challenge our current staffing to provide this enhanced training. As such, I am opposed to the current proposed regulatory changes to the SCOP Firearms regulations and request that this part of the regulatory process be reverted back to the standard Private Security Services training requirements.

Commenter: Michael Goode

REGULATORY CHANGES TO SPECIAL CONSERVATOR OF THE PEACE PROGRAM

I am currently an Armed Special Conservator of the Peace, and have been for 12 years. I am a Watch Commander for the Security Services Department at the Virginia Museum of Fine Arts. We have a very robust SCOP program at VMFA, and it has served us well for many years. Upon entry into this program I had to attend and successfully complete the Entry Level SCOP course and Firearms Qualification. I have also

attended annual In-Service and had to requalify with a firearm. The Firearms Course was the required DCJS course mandated by the Private Security Services Section. This firearms course was professionally administered by qualified Instructors and has served us well. Unfortunately, the proposed changes to the firearms regulations will require all SCOP officers to now qualify on a law enforcement course. This problem with this change is that we are a purely security function. We do not operate in any way like a law enforcement agency and are not exposed to the daily hazards that police officers are. The SCOP program is also administered and managed by the PRIVATE SECURITY SERVICES SECTION of DCJS, not the law enforcement section. Also, changing to this new requirement will be costly in terms of ammunition costs and additional ranges fees (if we can even secure adequate range times), and scheduling demands by having to re-train all of our officers. Based on the reasons listed above, I am opposed to the new firearms regulations for SCOP officers and request that the regulations remain as they now are.