## **COMMON INTEREST COMMUNITY BOARD**

## AGENCY RESPONSE TO DPB'S ECONOMIC IMPACT ANALYSIS

Agency Response to Economic Impact Analysis Performed by the Virginia Department of Planning and Budget Regarding the Common Interest Community Manager Regulations:

Concur with the approval.

The Agency wishes to provide clarification regarding the current training requirements as described in the first paragraph of the "Training Requirements" section of the Economic Impact Analysis.

Individuals may, but are not necessarily required, to complete a Board-approved training program to qualify a firm for licensure as a common interest community manager, or to receive certification as a principal or supervisory employee. Section 54.1-2349(A)(2) of the Code of Virginia requires the Board to establish criteria for licensure of common interest community managers. The criteria must include "...designation as an Accredited Association Management Company ("AAMC") by the Community Associations Institute." However, the Board may establish an alternative to such criteria to include "...successful completion of another Board-approved training program and certifying examination..." A firm that is accredited as an AAMC is not required to have its employees complete a Board-approved training program. By regulation, the Board also permits an individual who is certified as a Professional Community Association Manager by the Community Associations Institute to qualify a firm for licensure. Such individual is not required to complete a Board-approved training program.

Similarly, § 54.1-2349(A)(3) of the Code of Virginia requires the Board to establish criteria for certification of principal or supervisory employees. The criteria must include "...designation as a Certified Manager of Community Associations by the Community Association Managers International Certification Board, designation as an Association Management Specialist by the Community Associations Institute, or designation as a Professional Community Association Manager by the Community Associations Institute." However, the Board may establish an alternative to such criteria to include completion of a Board-approved training program. Individuals who have received the credentials detailed above are not required to complete a Board-approved training program.

The Board has established two types of such training programs as outlined in 18VAC48-50-250.A and 18VAC48-50-250.B. The first type, introductory training program, is a minimum of 16 contact hours. The second type, comprehensive training program, is a minimum of 80 contact hours. An individual who completes the shorter program is required to have more experience providing management services than an individual who completes the longer program.