



Proposed Regulation Agency Background Document

Agency name	BOARD OF TOWING AND RECOVERY OPERATORS
Virginia Administrative Code (VAC) citation	24 VAC 27-30
Regulation title	Practice of Towing and Recovery Operators
Action title	Towing and Recovery Operators
Date this document prepared	October 4, 2007

This information is required for executive branch review and the Virginia Registrar of Regulations, pursuant to the Virginia Administrative Process Act (APA), Executive Orders 36 (2006) and 58 (1999), and the *Virginia Register Form, Style, and Procedure Manual*.

Brief summary

In a short paragraph, please summarize all substantive changes that are being proposed in this regulatory action.

These regulations govern the licensure, practice, and discipline of towing and recovery operators. The Virginia Board (the Board) for Towing and Recovery Operators (BTRO) was established by the enactment of Chapters 874 and 891 of the 2006 General Assembly. The operation of the Board became effective July 1, 2006. Licensure, regulation, and enforcement of standards of practice are intended to become effective July 1, 2008. Continuing education requirements contained herein are intended to become effective July 1, 2011, thereby affording the Board time to evaluate and perhaps cause to have developed, appropriate training courses and systems.

Legal basis

Please identify the state and/or federal legal authority to promulgate this proposed regulation, including (1) the most relevant law and/or regulation, including Code of Virginia citation and General Assembly chapter number(s), 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.

The *Code of Virginia* (1950) as amended, § 46.2-2805 *et seq.*, grants to the Board of Towing and Recovery Operators the authority to establish qualifications for licensure, regulate, collect licensure fees, and discipline persons and enterprises engaging in the towing of vehicles. Specifically, § 46.2-2809 provides: “The Board may promulgate regulations requiring persons licensed under this chapter to keep and maintain records reasonably required for the enforcement of provisions of this chapter, and any other regulations, not inconsistent with the provisions of this chapter, as it shall consider necessary for the effective administration and enforcement of this chapter.”

Furthermore, § 46.2-2812 provides “[o]n and after July 1, 2008, it shall be unlawful for any person to engage in business in the Commonwealth as a towing and recovery operator without first obtaining a license as a Class A or Class B operator as provided in this chapter. Violation of any provision of this section shall constitute a Class 1 misdemeanor.”

Purpose

Please explain the need for the new or amended regulation by (1) detailing the specific reasons why this regulatory action is essential to protect the health, safety, or welfare of citizens, and (2) discussing the goals of the proposal, the environmental benefits, and the problems the proposal is intended to solve.

The purpose of this regulatory action is to establish new regulations for the Board of Towing and Recovery Operators. These regulations are required for the safety and welfare of the citizens of the Commonwealth as a way to address the apparently inconsistent or outdated state statutes and a patchwork of local ordinances which have been ineffective in ensuring fairness to either those in the towing and recovery business or those owners of vehicles whose vehicles are towed. These regulations are also necessary for the general safety of travelers on the highways of the Commonwealth. The goals of these regulations are to create statewide standards for licensure and to collect licensing fees to be paid into the state treasury for credit to the Board of Towing and Recovery Operators Fund.

Substance

Please briefly identify and explain the new substantive provisions, the substantive changes to existing sections, or both where appropriate. (More detail about these changes is requested in the “Detail of changes” section.)

The regulation sections that are affected by this action are 24 VAC 27-30-10 *et seq.*

These regulations establish new requirements for the BTRO that was created by actions of the 2006 General Assembly. These actions became Chapters 874 and 891 once enacted by the Governor. Section 46.2-2805 of the *Code of Virginia* creates the authority of the Board for Towing and Recovery Operators: (i) to establish requirements and oversight of towing and recovery operators and the towing and recovery industry, (ii) to ensure their possessing and maintaining minimal levels of competency for the public safety and welfare, (iii) to establish the

necessary qualifications for licensure and regulation of towing and recovery operators, (iv) to ensure the competency and integrity of the regulated industry, (v) to examine applicants, (vi) to establish renewal schedules, (vii) to administer fees to cover the administrative expenses of the regulatory program, and (viii) to take disciplinary action for violation of laws and regulations, and to provide oversight for and enforcement of authorized documentation of drivers of towing and recovery vehicles.

The issues of concern to the citizens of the Commonwealth and this industry that these regulations are intended to address are as follows:

- Rogue towing operators engaging in false advertising, predatory towing, impersonating other towing operators, charging for services not rendered, operating without locally required business licenses, charging fees that vary depending on how expensive the towed vehicle appeared to be or what it appeared the customer could afford to pay;
- Towing operators who refused to accept nationally known credit cards as payment for towing services and demanded cash payments instead or refusing to give customers change up to \$100;
- Towing operators who failed to inform local law enforcement entities that vehicles had been towed from private property thereby causing the vehicles' owners to have to search, sometimes over several days, for their vehicles while incurring additive storage fees;
- Towing operators who failed to carry business insurance and who conducted towing activities with equipment not intended to be used for towing activities. Towed vehicles have been damaged, consequently, and the vehicle owners have no insurance recourse by which to secure repairs for their damaged vehicles; and
- Towing operators who have failed to conduct towing activities in a safe and effective manner.

Due to the nature of this public service, this industry is also concerned about individuals who are required to register anywhere (all other states as in other nations) as sex offenders being able to replicate their previous crimes on new victims. Also, the Board's basic enabling statute requires that sex offenders be excluded from receiving operator licenses or driver authorizations in these regulations.

Various sections regarding weight limit standards (for example 24VAC27-30-110 E and F) are commonly accepted industry standards and, as such, have been reflected in these regulations.

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 the regulatory action poses no disadvantages to the public or the Commonwealth, please so indicate.

The primary disadvantage to this industry is that individuals and businesses offering towing and recovery services have never before been licensed and regulated. Some individuals and businesses can be expected to object to these regulations with the argument that ‘we have never before had to get a license’ and ‘it has always been done this way.’ However, the 2006 General Assembly made the decision to license and regulate this industry and these regulations merely propose to implement that legislative decision.

The amount of licensing fees can also be seen as an issue for this industry that is comprised of some very small (one-truck) operations as well as slightly larger operations. However, if the fee amount is considered over the course of the entire year of the license, the cost is only \$1.36 per day (or \$9.61 per week). A disadvantage to the towing businesses that are now to be regulated is that they will also have criminal background check fees and fingerprinting fees to pay whereas in the past there have been none. Towing businesses will also be required to maintain certain paperwork for specified periods of time that will create record keeping issues in addition to being required to post their fees for customers and provide BTRO contact phone numbers for dissatisfied customers wishing to file complaints.

One possible disadvantage to the public might be that a one-truck operation may elect to cease operating in a locality rather than seek licensure. At this point, it is not known, in spite of the Board’s efforts to identify the affected entities, how many businesses may elect this option.

A considerable advantage to the citizens of the Commonwealth of these regulations is that they will bring greater consistency of service to the public by standardizing towing operators’ operations and conduct. Public safety will be enhanced because persons who have been convicted of certain barrier crimes will no longer be permitted to provide this service, thereby reducing opportunities for public contact. Citizens’ private property will be protected better by standardizing the equipment approved for use by this industry. The Commonwealth’s highways will be protected better when towing and recovery activities can be conducted in a licensed, safe manner.

Requirements more restrictive than federal

Please identify and describe any requirement of the proposal which are more restrictive than applicable federal requirements. Include 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 statement to that effect.

There are no known federal requirements that apply to the licensing and regulation of the towing and recovery industry.

Localities particularly affected

Please identify any locality particularly affected by the proposed regulation. Locality particularly affected means any locality which bears any identified disproportionate material impact which would not be experienced by other localities.

There are no localities that should expect a disproportionate impact from these regulations as they will be uniformly applied statewide. Local governments are expected to welcome a decrease in citizens' complaints about predatory, dishonest, and destructive towing practices that these regulations are intended to reduce if not eliminate.

Public participation

Please include a statement that in addition to any other comments on the proposal, the agency is seeking comments on the costs and benefits of the proposal and the impacts of the regulated community.

In addition to any other comments, the Board is seeking comments on the costs and benefits of the proposal and the potential impacts of this regulatory proposal. Also, the Board is seeking information on impacts on small businesses as defined in § 2.2-4007.1 of the Code of Virginia. Information may include 1) projected reporting, record keeping and other administrative costs, 2) probable effect of the regulation on affected small businesses, and 3) description of less intrusive or costly alternative methods of achieving the purpose of the regulation.

Anyone wishing to submit written comments may do so by mail, email or fax to Benjamin Foster, Executive Director, c/o DMV, 2300 W. Broad Street, Richmond, VA 23220 [804-367-0226; fax 804-367-6631; email Benjamin.Foster@dmv.virginia.gov]. Written comments must include the name and address of the commenter. In order to be considered, comments must be received by the last date of the public comment period as published in the Virginia Register of Regulations. Written comments may also be provided on the public forum on the Regulatory Townhall for these proposed regulations (www.townhall.virginia.gov).

A public hearing will be held and notice of the public hearing will appear on the Virginia Regulatory Town Hall website (www.townhall.virginia.gov) and can be found in the Calendar of Events section of the Virginia Register of Regulations. Both oral and written comments may be submitted at that time.

Economic impact

Please identify the anticipated economic impact of the proposed regulation.

At the time of the formulation of the 2006 legislation, an initial estimate was made of the number of towing business operators and drivers that may be affected by these regulations. At that time,

the Virginia State Police had a list of 1,100 to 1,200 towing and recovery businesses. A comparison of this list to those towing and recovery businesses listed in the telephone directories in some localities showed that approximately half of the businesses in the phone book were represented in the State Police’s list. Using this proportion (50%), it is estimated that there may be 2,200 businesses and 9,000 to 10,000 drivers who may be subject to these licensing fees and regulatory requirements.

<p>Projected cost to the state to implement and enforce the proposed regulation, including (a) fund source / fund detail, and (b) a delineation of one-time versus on-going expenditures</p>	<p>The BTRO has been loaned \$700,000 to initiate its operations until such time as it begins to collect licensing and driver authorization fees which are required by statute to sustain the Board’s operations. BTRO has projected for FY 08-09 a budget of \$930,992 for operations.</p>
<p>Projected cost of the regulation on localities</p>	<p>There are not expected to be any costs to the localities for these regulations.</p>
<p>Description of the individuals, businesses or other entities likely to be affected by the regulation</p>	<p>Towing and vehicle recovery operators will be affected by these regulations. Drivers who are employed by these businesses will also be affected.</p>
<p>Agency’s best estimate of the number of such entities that will be affected. Please include an estimate of the number of small businesses affected. Small business means a business entity, including its affiliates, that (i) is independently owned and operated and (ii) employs fewer than 500 full-time employees or has gross annual sales of less than \$6 million.</p>	<p>Approximately 2,200 business operators and 9,000 to 10,000 drivers are estimated to be affected. All of the businesses in this industry fit the Code definition of a small business with regard to being independently owned and operated and employing fewer than 500 full time employees. It is not known, for the entities to be affected, what the gross annual sales are.</p>
<p>All projected costs of the regulation for affected individuals, businesses, or other entities. Please be specific. Be sure to include the projected reporting, recordkeeping, and other administrative costs required for compliance by small businesses.</p>	<p>New licenses will cost \$500; renewals \$500; driver authorization fees will be \$50. Please refer to the regulation section 24VAC27-30-20 for the other proposed fees.</p> <p>These business entities already keep business records and since there are no new record keeping requirements set out in these regulations, there are not expected to be any new costs to be incurred for record keeping.</p>

Alternatives

Please describe any viable alternatives to the proposal considered and the rationale used by the agency to select the least burdensome or intrusive alternative that meets the essential purpose of the action. 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 regulation.

Due to the highly specific nature of the 2006 General Assembly’s action in Chapters 874 and 891, the Board lacks the authority to consider highly variable policy alternatives. While establishing the Board, the General Assembly set out specific directives for the Board to implement that are carried out in these regulations.

The BTRO considered setting lower licensing fees but, since it is required to be self-sustaining from such collected fees, believes that these proposed fee rates to be a reasonable compromise between the legislative mandate and the industry’s needs.

Regulatory flexibility analysis

Please 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) the establishment of less stringent compliance or reporting requirements; 2) the establishment of less stringent schedules or deadlines for compliance or reporting requirements; 3) the consolidation or simplification of compliance or reporting requirements; 4) the establishment of 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 proposed regulation.

One of the primary purposes of these regulations is to protect the safety and welfare of citizens of the Commonwealth. The members of the BTRO are all small business operators themselves consistent with the *Code of Virginia* definition at § 2.2-4007.1. These proposed regulations do not require small businesses to engage in any reporting requirements but only to retain towing records for one year from dates of services. The only performance standards contained in these regulations are tied directly to the provision of safe and effective towing and recovery services with the use of equipment designed and constructed specifically for these activities. All of the equipment standards and licensing fees, criminal record background checks, and fingerprinting requirements contained herein are intended to be applied uniformly across the entire industry. No small businesses, or those that are smaller than the businesses operated by BTRO members, are singled out with unique requirements.

Public comment

Please summarize all comments received during public comment period following the publication of the NOIRA, and provide the agency response.

The BTRO’s Notice of Intended Regulatory Action was published in the June 25, 2007 *Virginia Register* (VR 23:21) for its public comment period from June 25, 2007, to July 25, 2007. No written comments were submitted in response to this NOIRA. A public meeting was also held on this Notice on July 16, 2007, at the DMV main office in Richmond, VA. Comments were received from a representative of the Automobile Association of America (AAA). No other individuals spoke at this meeting. The submitted comments were as follows:

Commenter	Comment	Agency response
Representative of AAA-Mid Atlantic	The speaker stated that he hoped the regulations would enhance the industry by providing more public safety. He hoped that the	BTRO took these comments under advisement.

	<p>regulations would not become a financial burden to any owners of the companies or create an administrative process that is not timely and would interfere with road services. He hoped that the BTRO would keep an open mind on other vendors that can supply training, as AAA-Mid Atlantic is an originator of many training programs. This office has provided basic training in the law provided to law enforcement agencies that has brought them up to code in their communities. This office has also provided other types of training. Some of the BTRO members have gone through this AAA training, which is free to all AAA members.</p>	
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Family impact

Please assess the impact of the proposed regulatory action on the institution of the family and family stability including to what extent the regulatory action will: 1) strengthen or erode the authority and rights of parents in the education, nurturing, and supervision of their children; 2) encourage or discourage economic self-sufficiency, self-pride, and the assumption of responsibility for oneself, one's spouse, and one's children and/or elderly parents; 3) strengthen or erode the marital commitment; and 4) increase or decrease disposable family income.

These changes do not strengthen or erode the authority or rights of parents in the education, nurturing, and supervision of their children; or encourage or discourage economic self-sufficiency, self-pride, and the assumption of responsibility for oneself, one's spouse, and one's children and/or elderly parents. It does not strengthen or erode the marital commitment, but may decrease disposable family income depending upon which provider the recipient chooses for the item or service prescribed.

Detail of changes

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

If the proposed regulation is intended to replace an emergency regulation, please list separately (1) all changes between the pre-emergency regulation and the proposed regulation, and (2) only changes made since the publication of the emergency regulation.

There are no regulations currently in the Virginia Administrative Code for this subject.

Proposed new section number, if applicable	Proposed change and rationale
24VAC27-30-10	Definitions. This section provides definitions of the terms required for these regulations.
24VAC30-70-20	Fees. This section establishes the fees for various aspects of these regulations, such as application, license renewal, reinstatement, decal, duplicate copy of license, and returned check fees.
24VAC30-70-30	General requirements for operator’s licensure. This section provides that persons who apply for licenses issued by this Board must be legally authorized to conduct a towing business in the Commonwealth. Applicants for these licenses must provide the standard types of information (individual or business name, address, responsible individual, principal owner’s name or owners’ names, and certify that such persons have not been convicted of any (either felony or misdemeanor) criminal offense. These regulations permit the Board to deny applicants’ license request if it determines that such applicants’ criminal history makes them unfit or unsuited to engage in providing towing and recovery services. These regulations also set out circumstances around felony and misdemeanor convictions, which will not bar the applicant from being granted a license. Applicants must also provide to the Board information about the type of equipment to be used in towing and recovery activities. License applicants must also provide information about the individuals who will be engaged in the actual towing and recovery activities. These regulations also provide that licensees will be required to prominently post and provide copies of their fees for reference by their customers. These regulations will prohibit licensees from charging fee amounts that are not included in such lists.
24VAC30-70-40	Operator’s licensure without examination. This section provides applicants for such towing and recovery operator’s licenses submit Board approved applications, certify that the applicant has read and understands the rules governing this practice. In order to qualify for ‘grandfather status’, which exempts applicants from otherwise required written examinations, applicants must provide proof of their being engaged in towing and recovery business on January 1, 2006. The availability of ‘grandfather status’ is set, in these proposed regulations, to expire on July 1, 2008, if the application has not been

	received.
24VAC30-70-50	Operator’s licensure by examination. This section provides that applicants who do not qualify for grandfather status or who were not engaged in the business of towing and recovery operations on January 1, 2006, shall be required to submit applications, on the Board’s form, and remit payment of fees. Applicants for Class A and Class B licenses shall be required to submit evidence of passage of certification examinations. Additionally, the principal owners or responsible individuals will also be required to pass open book examinations jurisprudence examinations, concerning the rules governing towing and recovery operators, to be provided by the Board.
24VAC30-70-60	Operator’s licensure by endorsement. This section provides that persons who have engaged in towing and recovery operations in other states may obtain a license from this Board by the endorsement method if certain requirements and standards set out in the regulations are met.
24VAC30-70-70	Exemptions. This section provides that certain types of towing equipment will be exempt from regulation by this Board: rollbacks, automobile or watercraft transporters defined in the Code § 46.2-100 <i>et seq.</i> Household goods carriers and tow trucks owned and operated by government entities are also to be exempted from this Board’s licensing requirements. Tow trucks that are properly domiciled and registered in other states are to be exempted except if they are picking up a vehicle in the Commonwealth. In such instances, these tow trucks will be required to obtain temporary trip permits from this Board. Privately owned tow trucks, which are used exclusively to haul vehicles owned by the tow truck owner, are also to be exempted from this Board’s requirements. Tow trucks, carrying dealer tags, owned and operated by two truck dealers and manufacturers that are moving through the Commonwealth for the sole purchase of demonstration or sale will also be exempted from these regulations.
24VAC30-70-80	Transfer of operator’s license. This section provides that, in general, issued licenses will not be transferable between individuals. These regulations do provide for a limited transferring of licenses in emergency situations to be approved by the Executive Director of this Board.
24VAC30-70-90	Temporary trip permits, regulations, fees. This section provides that the Board may issue temporary trip permits to tow truck owners who would otherwise be subject to this licensure. Such temporary trip permits will be time limited and the truck owner must provide certain specified information to the Board in order to obtain one.
24VAC30-70-100	Unprofessional conduct. This section provides for the Board’s response to licensees’ conduct that it deems to be unprofessional. It shall be deemed unprofessional conduct to violate the Board’s regulations, to employ drivers

	<p>who are not licensed to drive tow trucks, to fail to notify the Board of changes in important business information, to fail to have the business' name prominently displayed on all tow trucks, to fail to retain for one year records of services provided and fees charged, to fail to allow an authorized representative of the Board to inspect, during normal business hours, equipment and records, to fail to accept payment via nationally recognized credit cards, to fail to provide price lists of fees and charges to customers upon their requests, to fail to appropriately display the Board's issued decals on all affected tow trucks.</p>
<p>24VAC30-70-110</p>	<p>Standards of practice. This section provides that violations of requirements contained in this section will be subject to disciplinary actions and sanctions. Business operators will be required to have their physical plants comply with all applicable state and local building and zoning laws or codes. Business operators will be required to secure from the locality in which they operate all locally required business licenses. Business operators will be required to notify the Board if they cease to operate if they elect to close their businesses. Licensed operators will be required to show proof of their having certain specific amounts of business and liability insurance as well as workers' compensation coverage. Business operators will be required to certify that only the proper type and size of equipment will be used for towing activities. Tow trucks will be required to meet federal size and weight requirements for the vehicle to be towed. Equipment will be factory manufactured units and safety straps and chains will be used for towing activities. All advertisements for towing services must contain certain specified information. Business operators will be responsible for their employees during their hours of operation. Business operators will not be permitted to provide public safety towing (in response to police officers calls for towing) if they do not meet Board specified criteria and have been placed on a list specified in the <i>Code of Virginia</i> §46.2-2826. Tow truck drivers will be required to notify the State Police whenever they remove vehicles from improper locations without the vehicle owners' consent. If the truck drivers fail to make such a notification to the State Police, then the business operator will be restricted in how much can be charged to the owner for towing and storage services. Business operators will be required to comply with all local ordinances and contracts with regard to private property towing. Towing of vehicles from private property without the owners' consents shall have fees limited by the Code § 46.2-1233.1. Operators shall not engage in impersonating other operators or make false or misleading advertising. No operator will tow a vehicle having a gross vehicle weight exceeding 26,000 pounds without being appropriately licensed. Business operators will not be allowed to operate his towing business in a deceptive, fraudulent manner nor in a way that endangers the health, safety and welfare of the public. Operators will not be allowed to use, or permit his employees to use, drugs and alcohol during normal business hours to the extent that such use renders them unsafe to provide towing and recovery services. Operators will be required to maintain lists of all</p>

	employed drivers and to provide lists of fees to customers. Operators must provide a contact phone number for the Board to customers who wish to file complaints. Operators must not knowingly over-charge its customers or charge for services not rendered.
24VAC30-70-120	Operating without a license, penalties. This section provides that BTRO may investigate is operators are engaged in or offering towing and recovery services without an appropriate license. If such situations are found to exist, then BTRO is authorized to bring legal action in the name of the Commonwealth.
24VAC30-70-130	Expedited process to consider consumer complaints. This section provides that the Board’s Executive Director will have the authority to mediate and resolve complaints filed by citizens against those operators and drivers who have been licensed by the BTRO. BTRO will establish in policy and in publicly available guidance documents procedures for the handling of anonymous complaints.
24VAC30-70-140	Prerequisites for Application for Tow truck Driver’s Authorization Document. This section provides that BTRO will accept applications for drivers’ authorization documents at its office in Richmond and on its website. Appropriate fees for criminal record background checks and fingerprinting must accompany such applications. The BTRO will provide to the applicant a unique Originating Number that will travel with fingerprinting and criminal background checks processes. Results from such background checks shall be returned to BTRO for review and consideration against the regulatory requirements. This section provides specific situations in which BTRO may not deny such applications and the circumstances and situations to be considered in making these determinations.
24VAC30-70-150	Exemptions from tow truck driver authorizations. This section provides that driving a tow truck through the Commonwealth when the vehicle was picked up outside the state shall not be subject to driver authorization.
24VAC30-70-160	Requirements for drivers. This section provides for requirements applicable to tow truck drivers such as, valid and appropriate drivers’ license and BTRO driver authorization when the towed vehicle is picked up in the Commonwealth and the towing is for hire. Drivers must provide proof to BTRO that they are employed or about to be employed at the time of requesting the authorization. Drivers must keep readily available, when engaged in a towing action, their driver authorization document. The driver must notify the BTRO within 5 business days if convicted of any criminal offense especially any offense that requires the driver to register as a sex offender in any state in the United States or any foreign country. Drivers must provide towing actions in a safe manner and be knowledgeable about the BTRO’s requirements. Whenever a driver ceases employment with one

	operator and changes to another operator, BTRO must be notified within 15 days. Drivers must surrender their authorization document if the BTRO rescinds or cancels its effectiveness for cause.
24VAC30-70-170	Renewal of licensure, reinstatement; renewal of fees. This section provides requirements in situations where operators and drivers permit their licenses or authorizations to lapse and wish to renew them.
24VAC30-70-180	Requirements for continuing education. This section provides for its effective date to be deferred to July 1, 2011, by which time the BTRO expects to have identified and approved of appropriate educational offerings, which will satisfy its standards.