



## Proposed Regulation Agency Background Document

<b>Agency name</b>	Department of Criminal Justice Services
<b>Virginia Administrative Code (VAC) citation</b>	6 VAC 20-171
<b>Regulation title</b>	Regulations Relating to Private Security Services
<b>Action title</b>	Comprehensive Revision – Regulations Relating to Private Security Services
<b>Date this document prepared</b>	July 1, 2010

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

### Brief summary

*In a short paragraph, please summarize all substantive provisions of new regulations or changes to existing regulations that are being proposed in this regulatory action.*

The proposed regulation establishes a licensure, registration and certification process for locksmiths, detector canine handlers and detector canine handler examiners in accordance with legislative amendments to the Code of Virginia §9.1-138 et seq. The regulation establishes a regulatory fee structure, compulsory minimum entry-level training standards including firearms training and qualifications, standards of conduct and administration of the regulatory system. These regulations will replace emergency regulations in effect for the locksmith industry.

Additionally, the proposed regulations are the result of a comprehensive review of the entire regulatory program for private security services in which amendments and new language effect the fee structure, training sessions, firearms training enhancement, administrative requirements and standards of conduct as well as minor changes for purposes of clear and concise language.

### Acronyms and Definitions

*Please define all acronyms used in the Agency Background Document. Also, please define any technical terms that are used in the document that are not also defined in the "Definition" section of the regulations.*

No additional acronyms or definitions required

### 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.*

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The legal authority to review, amend or revise regulations relating to private security services is found in 9.1-141 of the Code of Virginia. Additionally, this review was in accordance with Executive Order 36 (2006). The Department has the statutory authority to adopt regulations pursuant to the Code of Virginia §2.2-4011 (B).

### 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.*

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The purpose of this regulatory action is a comprehensive review and amendment of existing regulations. This review and recommended amendments is based on legislative actions that require development of regulations for locksmiths as well as further development of regulations relating to detective canine handlers. In addition to recent legislative actions, a comprehensive review will amend and revise the rules mandating and prescribing standards, requirements and procedures that serve to protect the citizens of the Commonwealth from unqualified, unscrupulous and incompetent persons engaging in the activities of private security services.

This regulatory action is essential to protect the health, safety and welfare of citizens who utilize the various categories of private security services by establishing the regulatory requirements for locksmiths and detector canine handlers. These regulations ensure they have a criminal background check, meet minimum training standards and are held to prescribed standards of conduct. Knowing that locksmiths and detector canine handlers have met these regulatory requirements increases the public trust and brings credibility to the industry. The revised firearms training requirements directly increases the level of competence for individuals who utilize firearms in a private security defined field. The additional training should have a direct impact in the reduction of accidental discharges of firearms.

### Substance

*Please briefly identify and explain new substantive provisions (for new regulations), substantive changes to existing sections or both where appropriate. (More detail about all provisions or changes is requested in the "Detail of changes" section.)*

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While all areas of the regulations will be subject to this comprehensive review, the substance of this review will be to include a permanent regulatory scheme for locksmiths and detector canine handlers, examiners and teams operating within the Commonwealth. This review will focus on reevaluating the existing licensure, registration, certification and training requirements, procedures, fees, administrative requirements and standards of conduct.

**6 VAC 20-171-10 – Definitions:**

Definitions have been inserted or amended in regard to the regulatory program established for locksmiths and detector canine handlers and examiners in accordance with the Code of Virginia §9.1-138 et seq. Other amendments to the definitions are based on terminology related to variances in methods of conducting training.

**6 VAC 20-171-20 – Fees**

The amendments to the fee structure include an option for businesses to obtain a one year or two year initial license, an increase in the firearms endorsement fee, an additional category fee for training schools and instructors and a separation of certification applications fees and required regulatory compliance training fees. The electronic roster submittal fee has been deleted and instructor training development fees have been removed from the regulation. There is also a new manual processing service fee for applications not submitted by available electronic methods. Other amendments involve a restructuring of the fee schedule for clarity.

**6 VAC 20-171-30 – Fingerprint processing**

Amendments are included to reflect the current criminal history records search process utilized by the Department.

**6 VAC 20-171-50 – Initial business license application**

The amendments incorporate the new categories of locksmith and detector canine business as well as clarify what constitutes a legal entity change thus requiring a new license.

**6 VAC 20-171-70 – Compliance Agent**

This section has been amended to clarify the application process and requirements for a compliance agent. Two new sections have been inserted – **6 VAC 20-171-71 – Compliance Agent Certification Renewal Requirements** and **6 VAC 20-171-72 – Compliance Agent Regulatory Compliance Training Requirements**. The amendments do not make any major changes to the requirements but provide clarity for the process and make the process inclusive in one article of the regulations compared to being spread throughout the document.

**6 VAC 20-171-80 to 6 VAC 20-171-90 - Training school certification**

The proposed regulations establish the categories of training in which schools will be required to submit a category of training fee depending on the number of training categories provided by the training school. Language is included to clarify what constitutes a legal entity change.

**6 VAC 20-171-100 to 6 VAC 20-171-111- Instructor Certification**

Amendments include a new category of training fee, range qualification requirements for firearms instructors, and new training requirements to include regulatory compliance training and continuing education. Inserting a new section 6 VAC-20-171-111 provides clarity and makes the process inclusive in one article of the regulations.

**6 VAC20-171-115 –to 6 VAC20-171-117 – Detector Canine Handler Examiner Certification**

The new sections establish the initial, renewal and training requirements for certification.

**6 VAC20-171-120 to 6 VAC20-171-130 – Private Security Services Registration**

The amendments include the new categories of registration for locksmiths and detector canine handlers and include the requirement of a photo submission by the applicant.

**6VAC20-171-135 – Firearms endorsements**

This is a new section to clarify the process of obtaining a firearms endorsement and makes the process inclusive within one article of the regulations. It also establishes a timeframe in which retraining must be taken.

**6 VAC 20-171-180 – Reinstatement**

Amendments to the reinstatement procedures have been inserted which allow a company to continue to operate during the reinstatement period and establishes continued authority by the Department.

**6VAC20-171-190 – Renewal extension**

Amendments include a broader description of emergency temporary assignments to include purposes of natural disaster, homeland security or document threat. Language has been inserted which allows the department to waive the requirement of submittal prior to expiration with justification and establishes the timeframe that an exemption may be issued for.

**6 VAC20-171-200 – Denial, probation, suspension and revocation**

Includes an amendment in which the last known employing business or training school will be notified if an employee of the company is subject to disciplinary action by the department.

**6 VAC 171-220 to 6 VAC20-171-280 – Administrative Requirements and Standards of Conduct**

Amendments reflect new administrative requirements and standards of conduct for businesses, compliance agents, training schools, training school directors and instructors. These amendments include the removal of a provision that a business license or training school certification is null and void due to a lapse of insurance and inserts a clause that each day of uninsured activity would be construed as an individual violation. New provisions have been inserted for reporting requirements upon termination of a compliance agent or training school director. Administrative requirements to maintain a use of force policy, maintain records for employees carrying intermediate weapons, and records in regard to detector canine handler teams have been added for businesses.

Additional standards of conduct have been included to prohibit acting as an ostensible licensee for undisclosed persons, providing false or misleading information, or for providing materially incorrect, misleading, incomplete or untrue information to the department.

A provision has been added to establish standards of conduct pertaining to authorized access to the department's licensing database and additional reporting requirements have been added for training schools and school personnel regarding range qualification failures.

Other minor amendments are to ensure concise language for clarity and consistency.

**6 VAC20-171-305 – On-line service training programs**

This new section establishes the requirements for a school to offer on-line in-service training sessions.

**6VAC20-171-308 – Detector Canine Handler Examiners**

This new section establishes the administrative requirements and standards of conduct for detector canine handler examiners.

**6 VAC20-171-310 through 320 – Registered personnel administrative requirements and standards of conduct.**

The proposed regulations add a requirement that personnel who carry or have access to a patrol rifle while on duty must have written authorization from their employer and include additional standards of conduct to prohibit providing false or misleading information, or providing materially incorrect, misleading, incomplete or untrue information to the department.

**6 VAC20-171-350 – Entry level training**

The entry-level training has been restructured to include specific courses and hours for clarity. In addition, the minimum course and hour requirements for locksmiths and detector canine handlers have been added. The compulsory minimum training standards for armed security officers has increased from

40 hours to 50 hours due to an increase in firearms training hours and the hours for shotgun entry-level training have increased from 2 to 3 hours. Entry-level training was amended to include The Seven Signs of Terrorism to the minimum training standards. This is a direct result of a recommendation from the Commonwealth Preparedness Panel in order to strengthen the support role of private security practitioners in the Commonwealth's Critical Infrastructure Protection and Resiliency Strategic Plan.

The course content has been amended to reflect minor changes to the content for armed security officer classroom training, and the hour requirements for each individual section of a course has been removed. The proposed regulations reflect the course content for locksmiths and detector canine handler examiners and all training provisions for compliance agents has been deleted and added to section 6 VAC 20-171-70-172.

#### **6VAC20-171-360 – In-service training**

The amendments include in-service training requirements for locksmiths and detector canine handlers and combines the course content and minimum hour requirements within one section (Section B) thus eliminating the need for Section C.

#### **6VAC20-171-365 through 400 – Firearms training**

The entry-level firearms training compulsory minimum training standards have been amended. An enhanced firearms training for armed security officers/couriers and personal protection specialist has been inserted (6VAC20-171-375) and reflects an increase of 8 hours of training compared to the entry-level firearms training for all other armed registered categories. The entry-level handgun range qualification has been moved to a new section for clarity purposes (6VAC20-171-376) and a new course of fire has been inserted.

The advanced firearms training compulsory minimum training standards for personal protection specialists have been amended. The topics have been amended to address concealed carry laws and use of force. The hours are reduced due to the removal of duplicate training objectives already addressed in the basic firearms training requirements which is a prerequisite for the advanced handgun training.

The shotgun minimum training standards and course of fire have been amended which increases the classroom training by 2 hours.

A new section has been created to address entry level patrol rifle training (6 VAC20-171-395) and includes the classroom training and course of fire.

Amendments to firearms retraining increases the classroom hours to 4 hours for all armed registered personnel with the exception personal protection specialists who must complete advanced firearms retraining. This is a new requirement for the armed security officers.

#### **6VAC20-171-430-440 – Entry level security canine handler training.**

This section has been repealed and the provisions are now included in the entry-level and in-service training sections for registered personnel under 6 VAC 20-171-350 and 360.

#### **6 VAC20-171-500 – Disciplinary action; sanctions; publication of records.**

An additional sanction - the use of conditional agreements - has been added to the list of sanctions that the department may impose for a violation or noncompliance.

**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.*

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The primary advantage of implementing the new provisions presented in the proposed regulations is to provide necessary public protection tasked through existing statutes. Advantages to the public and the Commonwealth are to secure the public safety and welfare against incompetent, unqualified, unscrupulous or unfit persons engaging in activities of private security services in the Commonwealth. The goal of these amended regulations is to ensure eligible individuals in the private security services industry receive compulsory minimum training, abide by established standards of conduct and ensure that individuals with certain criminal history records, or who are in violation of rules established for public safety, are prohibited from performing private security services.

The establishment of these regulations does not pose any disadvantages to the public or the Commonwealth.

**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.*

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There are no applicable federal requirements.

**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.*

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There are no localities particularly affected by the proposed regulation.

**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.*

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In addition to any other comments, the board/agency is seeking comments on the costs and benefits of the proposal and the potential impacts of this regulatory proposal. Also, the agency/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, recordkeeping 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 via the Regulatory Townhall website, [www.townhall.virginia.gov](http://www.townhall.virginia.gov), or by mail, email or fax to Lisa McGee, Regulatory Manager, Department of Criminal Justice Services, Office of Regulatory Affairs, 1100 Bank Street, Richmond, Virginia 23219, [lisa.mcgee@dcjs.virginia.gov](mailto:lisa.mcgee@dcjs.virginia.gov) or via fax 804-786-6344. 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.

A public hearing will be held and notice of the public hearing may appear on the Virginia Regulatory Town Hall website ([www.townhall.virginia.gov](http://www.townhall.virginia.gov)) and the Commonwealth Calendar. Both oral and written comments may be submitted at that time.

**Economic impact**

*Please identify the anticipated economic impact of the proposed new regulations or amendments to the existing regulation. When describing a particular economic impact, please specify which new requirement or change in requirement creates the anticipated economic impact.*

<p><b>Projected cost to the state to implement and enforce the proposed regulation, including (a) fund source, and (b) a delineation of one-time versus on-going expenditures.</b></p>	<p>As a special fund agency, the Department must generate sufficient revenue to cover its expenditures from non-general funds, specifically the initial, renewal and application fees it charges to regulants for necessary functions of regulation. On-going expenditures for the agency are related to compliance and enforcement as required under the law. These include conducting investigations and audits to ensure compliance of the Code and Regulations as well as the implementation and maintenance of a technical licensure database system.</p>
<p><b>Projected cost of the <i>new regulations or changes to existing regulations</i> on localities.</b></p>	<p>None</p>
<p><b>Description of the individuals, businesses or other entities likely to be affected by the <i>new regulations or changes to existing regulations</i>.</b></p>	<p>Private Security Services practitioners to include businesses, training schools and individuals providing the following services or training: Armed and Unarmed Security Officer/Courier, armored car personnel, security canine handler, detector canine handler, private investigator, personal protection specialist, alarm respondent, locksmith, central station dispatcher, electronic security employee, electronic security sales representative, electronic security technician and electronic security technician's assistant.</p>
<p><b>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.</b> Small business means a business entity, including its affiliates, that (i) is independently owned and operated and (ii) employs fewer than</p>	<p>The amendments to the regulations will affect the following individuals/entities currently licensed/registered and/or certified. These numbers are approximate: 2000 private security services businesses 41,000 individual registrants with approximately</p>

<p>500 full-time employees or has gross annual sales of less than \$6 million.</p>	<p>9,750 of those armed. 2,416 compliance agents, 488 instructors and 128 private security services training schools.</p> <p>The department cannot provide specific documentation in regard to a verifiable number of small businesses. The department believes that over 75% of the businesses would fall within the definition of a small business based on observation of the licensing unit and interaction with businesses through the compliance and enforcement unit. The department does not track the employment or gross annual sales for licensed businesses.</p>
<p><b>All projected costs of the <i>new regulations or changes to existing regulations</i> for affected individuals, businesses, or other entities. Please be specific and do include all costs. Be sure to include the projected reporting, recordkeeping, and other administrative costs required for compliance by small businesses. Specify any costs related to the development of real estate for commercial or residential purposes that are a consequence of the proposed regulatory changes or new regulations.</b></p>	<p>There have been limited changes to the fee structure. The opportunity to apply for a one-year license versus a mandatory two-year license will assist in the start up costs for a new business.</p> <p>Individuals who carry or have access to a firearm while on duty will be affected by a \$5.00 increase in the firearm endorsement fee. In addition, there may be costs associated with an increase of 14 to 24 entry-level firearms training hours for armed security officers/couriers. The costs for training are established by certified private security services training schools and are not established by regulation.</p> <p>Training schools offering more than one category of training will be affected by a \$50.00 per additional category fee, There are a total Of 8 additional categories of training. The maximum increase for a two-year license would be \$400.00. These regulations also eliminate a fee for electronic roster submittal of \$500.00. Schools could see anywhere from a \$100.00 to \$500.00 reduction in fees depending on how many categories of training they provide.</p> <p>Instructors who provide more than one category of training will be affected by a \$10.00 per additional category fee. There are a total of 8 categories of training. The maximum increase for a two-year instructor certification would be \$80.00. Any certified individual required to complete regulatory compliance training will be affected by a \$25.00 increase in training fees. This training is required every two years.</p> <p>Individuals who do not utilize the department's web-based licensing system will incur a \$5.00 application-processing fee. The department in conjunction with certified training schools will provide access and assistance with regulants in order to ensure availability of the web-based</p>



	<p>system thus limiting the requirement to pay additional processing fees.</p> <p>Regulants should not incur any further fees/costs as long as they maintain compliance with the Code and Regulations.</p>
<p><b>Beneficial impact the regulation is designed to produce.</b></p>	<p>These regulations are designed to protect the citizens of the Commonwealth from unqualified, unscrupulous and incompetent persons engaging in the activities of private security services.</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.*

Emergency regulations in regard to the inclusion of locksmiths into the regulatory program went into effect July 1, 2008. Meetings were held prior to the emergency regulation to establish training standards and meetings have been held to establish the base requirements for the detector canine credentials and procedures. In addition, the Department participated in initial reviews with the industry to establish the areas within the regulations requiring amendments. The Department provided the industry with a draft version of the proposed regulations and conducted public meetings in the Central, Southwest, Northern and Tidewater region of the Commonwealth. Any alternatives identified during this comprehensive review that are less burdensome and intrusive that will achieve the essential regulatory purpose were considered. There are no further alternatives viable to the proposed regulations.

**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.*

The Department believes that the majority of the businesses would fall within the definition of a small business based on observation of the licensing unit and interaction with businesses through the compliance and enforcement unit. The Department is moving towards a web-based application system which should provide less stringent reporting requirements. The proposed regulations also offer individuals the option to complete mandated in-service requirements via available online training programs. Other recommendations include removing the requirement that businesses maintain all

records at a physical location in the Commonwealth and allows for electronic submission of required documentation versus requiring the applicants to submit hardcopy documents. Any further less stringent compliance and reporting requirements will compromise public health, safety, environmental and economic welfare.

**Public comment**

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

Commenter	Comment and <u>Agency Response</u>	<u>Agency response</u>
<p>George and Pamela Hudson,  Owners of O.F. Newman &amp; Sons, Inc.</p>	<p>* Feels that Locksmith regulations have a negative impact on small businesses because they limit a small business owner’s choice in hiring employees to work as Locksmiths, because employees must be registered which requires training, applications and fees.</p> <p>* Recommends that in-house employees should work under the owners’ DCJS license with the requirement that the owners have responsibility for these employees.</p> <p>* Does not agree with the penalties that the Locksmith law creates for established locksmith businesses.</p> <p><u>Regulations are required pursuant to §9.1-141 of the Code of Virginia. Any amendment to the Code would require legislative action.</u></p> <p>* Favors that Locksmiths submit fingerprints and undergo criminal background checks to ensure public safety.</p> <p><u>The fingerprint criminal background check is pursuant to §9.1-139. The Department concurs.</u></p> <p>* Feels that the expenses required for licensure and registration are a burden to small businesses and hinder locksmith businesses from staying competitive with other companies, including retail merchants, who do in-house locksmith work.</p> <p><u>Pursuant to §9.1-142, the Department may levy fees that are sufficient to cover the expenses for administration and operation. The Department is recommending an option to apply for an initial one year license in order to reduce the initial fee requirements. There has been no increase to licensing or registration fees in this regulatory action.</u></p>	
<p>Robert Frydrych</p>	<p>*Objects to the passing of House Bill 462 – Locksmiths.</p> <p>* Objects that the bill was passed without the Governors office having the courtesy to hold public meetings around the state.</p> <p>* Feels that the Locksmith law is an overburdened, intrusive, confusing mess given to an agency (DCJS) that forms and interprets laws to fit their policy and puts guidelines on an industry they know nothing about.</p> <p>* Favors that the law was intended for the purpose of licensure and criminal background checks, but, opposes the placement of the Locksmith industry with the Department of Criminal Justice Services (DCJS) within the Private Security Services program.</p> <p>* Opposes the definition of the word Locksmith in the regulations.</p>	

	<p>* Feels that contractors, maintenance persons, hardware, box stores, and retail merchants should be required to be licensed and registered and removed from the Code 9.1-140, Exceptions from Article.</p> <p>* Suggests that Locksmith law be given to the localities for implementation through the Business License Department.</p> <p><u>The inclusion of locksmiths in the regulatory program is pursuant to the amendments to Virginia Code §§9.1-138-9.1-150. Effective 2008 c. 638.</u></p> <p><u>Any changes to the Code would require legislative action.</u></p> <p>* Opposes the regulation requiring a Locksmith to obtain a DCJS firearms endorsement card if that person already has a concealed carry permit.</p> <p><u>The requirement is for regulated individuals who have access to a firearm while providing private security services for the purpose of public safety. Concealed carry permits do not require qualification on a range.</u></p> <p>* Feels that the fees associated with the licensing and registrations for Locksmiths is a hardship to small businesses.</p> <p><u>Pursuant to §9.1-142, the Department may levy fees that are sufficient to cover the expenses for administration and operation. The Department is recommending an option to apply for an initial one year license in order to reduce the initial fee requirements. There has been no increase to licensing or registration fees in this regulatory action.</u></p>
<p>Luke A. Denton</p>	<p>*Objects to the passing of House Bill 462 – Locksmiths.</p> <p><u>The inclusion of locksmiths in the regulatory program is pursuant to the amendments to Virginia Code §§9.1-138-9.1-150. Effective 2008 c. 638.</u></p> <p><u>Any changes to the Code would require legislative action.</u></p>
<p>Mark A. Novitsky</p>	<p>* Opposes the regulation requiring a Locksmith to obtain a DCJS firearms endorsement card if that person already has a concealed carry permit.</p> <p><u>The requirement is for regulated individuals who have access to a firearm while providing private security services for the purpose of public safety. Concealed carry permits do not require qualification on a range.</u></p> <p>* Suggests that the definition of a Locksmith “Apprentice” and “Laborer” be added to the regulations.</p> <p><u>These terms are not specified in the Code or the regulations. The code specifically defines a locksmith which would include an apprentice and laborer if they provide locksmith services.</u></p>
<p>Wayne McDonald, Owner of The Lock Guy</p>	<p>* Opposes the placement of the Locksmith industry with the Department of Criminal Justice Services (DCJS) within the Private Security Services program.</p> <p>* Suggests that Code 9.1-140, Exceptions from Article be removed and require all contractors, handymen, property managers, facility managers, painters, lawyers, accountants, taxi drivers, tow truck drivers be required to be licensed and registered.</p>

	<p>* Suggests the Locksmith law be moved and grant regulatory oversight of the law to the Virginia State Board for Contractors.</p> <p><u>The inclusion of locksmiths in the regulatory program is pursuant to the amendments to Virginia Code §§9.1-138-9.1-150. Effective 2008 c. 638.</u></p> <p><u>Any changes to the Code would require legislative action.</u></p> <p>* Feels that the fees associated with the licensing and registrations for Locksmiths is a hardship to small businesses.</p> <p><u>Pursuant to §9.1-142, the Department may levy fees that are sufficient to cover the expenses for administration and operation. The Department is recommending an option to apply for an initial one year license in order to reduce the initial fee requirements. There has been no increase to licensing or registration fees in this regulatory action.</u></p> <p>*Suggests that the Locksmith training requirements include the topics of “Life Safety”, “Fire Code”, and “Uniform Statewide Building Code”.</p> <p><u>This has been included in the course outline under Public safety codes, NFPA and Safety code resources.</u></p> <p>* Opposes the regulation requiring a Locksmith to obtain a DCJS firearms endorsement card if that person already has a concealed carry permit.</p> <p><u>The requirement is for regulated individuals who have access to a firearm while providing private security services for the purpose of public safety. Concealed carry permits do not require qualification on a range.</u></p>
<p>Daryl Statome. Mobile Locksmith Co.</p>	<p>*Objects to the passing of House Bill 462 – Locksmiths.</p> <p>* Suggests that all locksmithing work that is performed on any public office or facility, should be required to obtain a DCJS license.</p> <p><u>The inclusion of locksmiths in the regulatory program is pursuant to the amendments to Virginia Code §§9.1-138-9.1-150. Effective 2008 c. 638.</u></p> <p><u>Any changes to the Code would require legislative action.</u></p>
<p>Charles Stacke</p>	<p>* Favors the Locksmith law, but suggests a simple background check and verification of minimal proof of knowledge of the job.</p> <p><u>The inclusion of locksmiths in the regulatory program is pursuant to the amendments to Virginia Code §§9.1-138-9.1-150. Effective 2008 c. 638.</u></p> <p><u>Any changes to the Code would require legislative action.</u></p>
<p>Albert S. Townsend</p>	<p>* Suggests that the Locksmith law be amended to consider a retired Locksmith to work without having to obtain a license and registration, as long as they don’t advertise for their services.</p> <p><u>The inclusion of locksmiths in the regulatory program is pursuant to the amendments to Virginia Code §§9.1-138-9.1-150. Effective 2008 c. 638.</u></p> <p><u>Any changes to the Code would require legislative action.</u></p>

P. Nebe, Autolox	<p>* Supports to the passing of House Bill 462 – Locksmiths.</p> <p><u>No response needed.</u></p>
Tom Demont	<p>* Favors the passing of House Bill 462 – Locksmiths.</p> <p>* Feels that the fees associated with the licensing and registrations for Locksmiths is a hardship to small businesses.</p> <p><u>Pursuant to §9.1-142, the Department may levy fees that are sufficient to cover the expenses for administration and operation. The Department is recommending an option to apply for an initial one year license in order to reduce the initial fee requirements. There has been no increase to licensing or registration fees in this regulatory action.</u></p> <p>* Suggests that the Locksmith law be redesigned to take into account the level of locksmith company you are. Example: A Locksmith 15+ employees, B Locksmith 10+ employees, C Locksmith 5+ employees, D Locksmith 1 locksmith no employees.</p> <p><u>Any changes to the law would require legislative action.</u></p>
Michael Groves, Federal Lock & Safe, Inc.	<p>* Favors the passing of House Bill 462 – Locksmiths.</p> <p>* Feels that the fees for licensing and registration for Locksmiths is substantial.</p> <p><u>Pursuant to §9.1-142, the Department may levy fees that are sufficient to cover the expenses for administration and operation. The Department is recommending an option to apply for an initial one year license in order to reduce the initial fee requirements. There has been no increase to licensing or registration fees in this regulatory action.</u></p>
Fred Stokley, Precision Locksmith Co., LLC	<p>* Supports the passing of House Bill 462 – Locksmiths.</p> <p>* Supports that regulatory oversight of the Locksmith law be housed within the Department of Criminal Justice Services.</p> <p><u>No response needed.</u></p>
David Hockman	<p>* Supports the passing of House Bill 462 – Locksmiths and the current fee structure.</p> <p><u>No response needed.</u></p>
Jackie Reynard	<p>* Opposes the regulation requiring a Locksmith to obtain a DCJS firearms endorsement card if that person already has a concealed carry permit.</p> <p><u>The requirement is for regulated individuals who have access to a firearm while providing private security services for the purpose of public safety. Concealed carry permits do not require qualification on a range.</u></p>
J&M Security and Lock, Inc.	<p>* Favors the Locksmith law, however, opposes the placement of the Locksmith industry with the Department of Criminal Justice Services (DCJS) within the Private Security Services program.</p> <p>* Suggests that Code 9.1-140, Exceptions from Article be removed and contractors,</p>

	<p>hardware stores, retail merchants, door companies, tow truck drivers and handymen be required to obtain a DCJS license and registration.</p> <p><u>The inclusion of locksmiths in the regulatory program is pursuant to the amendments to Virginia Code §§9.1-138-9.1-150. Effective 2008 c. 638.</u></p> <p><u>Any changes to the Code would require legislative action.</u></p> <p>* Suggests that alarm companies not be grandfathered into the Locksmith category for licensing and registration.</p> <p><u>Alarm companies are not grandfathered into the locksmith category. If an electronic security company is also providing locksmith services, the company must apply for an additional category of business service and ensure that the individuals providing the service obtain the proper registration.</u></p>
<p>Gary W. Ford, Eastern Safe &amp; Lock, Inc.</p>	<p>* Supports the passing of House Bill 462 – Locksmiths and the current fee structure.</p> <p>* Supports that regulatory oversight of the Locksmith law be housed within the Department of Criminal Justice Services.</p> <p><u>No response needed.</u></p>
<p>Chris Gray, A Master Locksmith Service, LLC</p>	<p>* Supports the passing of House Bill 462 – Locksmiths.</p> <p><u>No response needed.</u></p>
<p>Al Tucker, Dominion Lock and Security</p>	<p>* Favors the passing of House Bill 462 – Locksmiths, but, does not agree with the current fee structure.</p> <p>* Supports that regulatory oversight of the Locksmith law be housed within the Department of Criminal Justice Services.</p> <p><u>Pursuant to §9.1-142, the Department may levy fees that are sufficient to cover the expenses for administration and operation. The Department is recommending an option to apply for an initial one year license in order to reduce the initial fee requirements. There has been no increase to licensing or registration fees in this regulatory action.</u></p>
<p>Robert Carton, Arlington Lock, Inc.</p>	<p>* Supports the passing of House Bill 462 – Locksmiths.</p> <p><u>No response needed.</u></p>
<p>Deborah Flinchum, Brian’s Lock &amp; Key</p>	<p>* Supports the passing of House Bill 462 – Locksmiths, however, suggests that required or mandatory training for all locksmiths be left up to the owners of an individual company to decide which of their personnel needs the training.</p> <p>* Favors that Locksmiths submit fingerprints and undergo criminal background checks to ensure public safety.</p> <p><u>The Regulations establish the compulsory minimum training standards to ensure that all locksmith obtain a basic knowledge. It is an individual business practice if companies wish to provide additional training.</u></p> <p>* Suggests that retail merchants should not be an exception to the law.</p> <p><u>The exceptions in the regulatory program are pursuant to the amendments to Virginia Code §§9.1-138-9.1-150. Effective 2008 c. 638.</u></p> <p><u>Any changes to the Code would require legislative action.</u></p>

<p>Danny Washburn</p>	<p>* Suggests that there should be Locksmith appointed to the Private Security Services Advisory Board panel.</p> <p><u>Pursuant to §9.143, two members of the Board shall be representatives of locksmith businesses.</u></p> <p>* Does not support the Exceptions in the Locksmith licensing law.</p> <p><u>The exceptions in the regulatory program are pursuant to the amendments to Virginia Code §§9.1-138-9.1-150. Effective 2008 c. 638.</u></p> <p><u>Any changes to the Code would require legislative action.</u></p> <p>* Suggests that the Locksmith training be offered by individuals in the Locksmith industry.</p> <p><u>Training can be obtained through various venues to include partial training waivers for previous experience or training, or training can be received through certified training schools that utilize instructors certified by the Department. In order to provide locksmith training, an instructor must demonstrate previous instructor experience, training, work experience and education in the locksmith industry.</u></p>
<p>Meador &amp; Company Locksmith</p>	<p>* Feels that the fees associated with the licensing and registrations for Locksmiths is a hardship to small businesses.</p> <p><u>Pursuant to §9.1-142, the Department may levy fees that are sufficient to cover the expenses for administration and operation. The Department is recommending an option to apply for an initial one year license in order to reduce the initial fee requirements. There has been no increase to licensing or registration fees in this regulatory action.</u></p>
<p>Jon Hudgins, Associates Safe and Lock</p>	<p>* Supports the passing of House Bill 462 – Locksmiths, however, suggests that law and fee structure consider the location, size of the business and the scope of the work being performed.</p> <p><u>Pursuant to §9.1-142, the Department may levy fees that are sufficient to cover the expenses for administration and operation. The Department is recommending an option to apply for an initial one year license in order to reduce the initial fee requirements. There has been no increase to licensing or registration fees in this regulatory action.</u></p>
<p>Rena Jenkins</p>	<p>* Does not support the “Exceptions” in the Locksmith licensing law.</p> <p><u>The exceptions in the regulatory program are pursuant to the amendments to Virginia Code §§9.1-138-9.1-150. Effective 2008 c. 638.</u></p> <p><u>Any changes to the Code would require legislative action.</u></p> <p>* Feels that the fees associated with the licensing and registrations for Locksmiths is a hardship to small businesses and suggests that fees be structured like a local business license based on previous years business or potential business for new locksmiths.</p> <p><u>Pursuant to §9.1-142, the Department may levy fees that are sufficient to cover the expenses for administration and operation. The Department is recommending an option to apply for an initial one year license in order to reduce the initial fee requirements. There has been no increase to licensing or registration fees in this regulatory action.</u></p> <p>* Suggests the classes offered by Nationally recognized Associations be accepted for verification of Locksmith training.</p> <p><u>Under Article 3 6VAC20-171-445. persons may apply for a partial exemption from the compulsory training standards, based on previous experience and/or training. Classes offered by Nationally recognized associations would be accepted if the training meets or</u></p>

	<p><u>exceeds the minimum training requirements established by regulation.</u></p> <p>* Opposes the regulation requiring a Locksmith to obtain a DCJS firearms endorsement card if that person already has a concealed carry permit.</p> <p><u>The requirement is for regulated individuals who have access to a firearm while providing private security services for the purpose of public safety. Concealed carry permits do not require qualification on a range.</u></p> <p>* Favors that Locksmiths submit fingerprints and undergo criminal background checks to ensure public safety.</p> <p><u>No response needed.</u></p> <p>* Suggests that the definition of a Locksmith “Apprentice” be added to the regulations.</p> <p><u>There is no legal requirement established in the Code pertaining to locksmith apprentice. The regulations do not address a locksmith apprentice thus the definition is not needed.</u></p>
<p>Christopher Meccia</p>	<p>* Supports the passing of House Bill 462 – Locksmiths.</p> <p><u>No response needed.</u></p>
<p>Elliott Paul Conner, Top Secret Security</p>	<p>* Suggests that continuing education requirements be accepted/approved when locksmith training is completed through a Nationally recognized Association or a Local Locksmith Association.</p> <p><u>Under Article 3 6VAC20-171-445. persons may apply for a partial exemption from the compulsory entry-level training standards, based on previous experience and/or training. Classes offered by Nationally recognized associations would be accepted if the training meets or exceeds the minimum training requirements for entry-level and in-service training established by regulation.</u></p> <p>* Feels that the fees associated with the licensing and registrations for Locksmiths is not equal to all locksmiths.</p> <p><u>All licensees and registrants are required to abide by the same fee structure.</u></p> <p>* Recommends the term, “General Public” be better defined.</p> <p><u>The Department does not agree that this term needs to be defined in the regulations.</u></p> <p>* Does not support the Exceptions in the Locksmith licensing law.</p> <p><u>The exceptions in the regulatory program are pursuant to the amendments to Virginia Code §§9.1-138-9.1-150. Effective 2008 c. 638.</u></p> <p><u>Any changes to the Code would require legislative action.</u></p>
<p>Timothy Barham</p>	<p>* Feels that the fees associated with the licensing and registrations for Locksmiths is a hardship to small businesses.</p> <p><u>Pursuant to §9.1-142, the Department may levy fees that are sufficient to cover the expenses for administration and operation. The Department is recommending an option to apply for an initial one year license in order to reduce the initial fee requirements. There has been no increase to licensing or registration fees in this regulatory action.</u></p> <p>* Does not support the Exceptions in the Locksmith licensing law.</p> <p><u>The exceptions in the regulatory program are pursuant to the amendments to Virginia</u></p>



	<p><u>Code §§9.1-138-9.1-150. Effective 2008 c. 638.</u></p> <p><u>Any changes to the Code would require legislative action.</u></p>
<p>David Frydrych</p>	<p>* Favors the licensing of Locksmiths, however, feels that the regulatory oversight should be given over the local government.</p> <p>* Does not support the Exceptions in the Locksmith licensing law.</p> <p><u>The regulatory authority and exceptions in the regulatory program are pursuant to the amendments to Virginia Code §§9.1-138-9.1-150. Effective 2008 c. 638.</u></p> <p><u>Any changes to the Code would require legislative action.</u></p>
<p>Teresa Bayne</p>	<p>* Feels that Locksmiths should be trained, licensed and registered in Virginia.</p> <p><u>No response needed.</u></p> <p>* Does not support the Exceptions in the Locksmith licensing law.</p> <p><u>The exceptions in the regulatory program are pursuant to the amendments to Virginia Code §§9.1-138-9.1-150. Effective 2008 c. 638.</u></p> <p><u>Any changes to the Code would require legislative action.</u></p>
<p>Thomas Kramer, Automated Precision Technology, LLC</p>	<p>* Recommends that on-line training courses be approved for entry-level training requirements, and not just limited to the in-service training requirements.</p> <p><u>The Department does not believe that allowing on-line training for entry-level training requirements is feasible. The training requires practical exercises as well as a requirement for a written comprehensive. The Department would like to institute standardized testing in the future and will address the opportunity for individuals to receive training through various avenues upon the implementation of standardized testing.</u></p>
<p>J.E. "Jimmy" Cochrane, Blackwater Worldwide</p>	<p>* Recommends that initial scent detection training (K9 School) and all certifications must be done with real explosives or narcotics.</p> <p>* Recommends that an annual re-certification of all DCJS licensed Security Detector Dog handlers by a DCJS approved Master Trainer or Evaluator be required.</p> <p>* Require the initial training of the detection K9 team to be conducted at a DCJS approved explosive/narcotic canine training facility. This in turn will require that the training facility be properly licensed by the BATF and/or the DEA to possess explosives and narcotics. The federal license requirement will ensure that the training facility properly stores their training aids and maintains the required inventory records.</p> <p>* Suggests that if an individual applying for a Security Detector Dog Handler license has a background as a sworn law enforcement detector dog handler or as a military work dog handler who has conducted detector dog operations then the initial Security Detector Dog Course could be waived. If an individual receives a waiver they should be a required to attend an eight (8) hour Legal Issues class on K9 detection operations.</p> <p>* Suggests that the Security Detector Dog Handler training curriculum must be approved by DCJS and lesson plans will be subject to annual review.</p>

	<p>* Suggests a requirement of a documented minimum of four hours per week “non-task” related maintenance training and the required documentation of all the operational activities of the K9 Team.</p> <p>* Recommends that the individual tasked with the responsibility of certifying explosive detection K9 Teams (DCJS Evaluator), possess a military or law enforcement professional organization title of Master Trainer or equivalent.</p> <p><u>The Department established an ad hoc committee to discuss the regulatory requirements for the detector canine committee and met with Mr. Cochrane to further discuss new language, eligibility, training, and administrative requirements and standards of conduct. Mr. Cochrane’s comments/recommendations were addressed.</u></p>
<p>Kevin Nelson Precision Satellite, Inc.</p>	<p>* Feels that the current regulation allowing a 24- month timeframe to complete in-service training remain as it is and should not be changed to 12 months.</p> <p><u>The Department concurs.</u></p>
<p>John Charles Perkins</p>	<p>* Favors the idea that all security companies be required to register a specific uniform with a patch that helps identify the company.</p> <p><u>The Department does not believe this is feasible. There is a current requirement that if wearing a uniform that it contain at least one insignia clearly identifying the name of the licensed firm. Most security companies utilize uniforms.</u></p> <p>*Recommends that the training for armed security officers be extended for more than 3 days with more emphasis on law.</p> <p><u>The armed security officer training was amended in 2003 after the completion of a job task analysis. Armed security officers are required to take 2 hours of private security services orientation, 16 hours of security officer core subjects and 8 hours of arrest authority. In addition, the firearms training requirements were increased from 14 hours to 24 hours.</u></p>
<p>Steve Stroud, Tarheel Safe &amp; Lock, Inc.</p>	<p>* Suggests that the Department consider establishing a reciprocal agreement with North Carolina for Locksmiths.</p> <p><u>The Department will research this further.</u></p>
<p>Frederick R. Link</p>	<p>* Opposes the regulation requiring a Locksmith to obtain a DCJS firearms endorsement card if that person already has a concealed carry permit.</p> <p><u>The requirement is for regulated individuals who have access to a firearm while providing private security services for the purpose of public safety. Concealed carry permits do not require qualification on a range.</u></p> <p>* Feels that the fees associated with the licensing and registrations for Locksmiths is a hardship to small businesses.</p> <p><u>Pursuant to §9.1-142, the Department may levy fees that are sufficient to cover the expenses for administration and operation. The Department is recommending an option to apply for an initial one year license in order to reduce the initial fee requirements. There has been no increase to licensing or registration fees in this regulatory action.</u></p>

<p>Anonymous</p>	<p>* Recommends that registration identification cards issued to individuals meeting the requirements to be registered as armed security officers will be issued registration cards identifying their registration category as “Armed Security Officer” to ensure compliance with § 9.1-146 of the Code of Virginia.</p> <p><u><i>This is already a current procedure.</i></u></p> <p>* Recommends that a DCJS registration identification card, certification identification cards, and firearms endorsement identification cards be issued for each renewal and that Photographs should be updated for each renewal to ensure that physical changes are reflected on identification cards for security purposes.</p> <p><u><i>New state issued registration IDs and firearms endorsements are issued upon each renewal. The department does not believe that it is feasible to require photo IDs at each renewal but agrees that a photo should be resubmitted upon the request of the Department.</i></u></p> <p>* Favors that Training Schools should remain certified as they are currently. There appear to be no major problems caused by the present system. Changing to licensing of schools would increase operating and administrative costs to schools, training directors and Instructors with no substantive improvement to the training process.</p> <p><u><i>Any changes to the terminology of the training school credential would require legislative action. No changes are currently recommended in the regulations to change the school certification to a school license.</i></u></p> <p>* Suggests that PSS Training Schools should be offered the possibility of certification to teach Compliance Agents and Instructors as additional categories.</p> <p><u><i>The compliance agent training is geared around providing the individual with the tools to stay in compliance with the Code and Regulations and what administrative requirements must be met with the Department. The Department provides this training.</i></u></p> <p>* Suggests that training requirements must be thoroughly reviewed to ensure effectiveness, practical applications, and relevance.</p> <p><u><i>The Department is not recommending any further amendments to the course content for the other courses at this time. The Department is looking into implementing standardized testing in the future and upon the completion of the research will be able to better address what training amendments are needed in order to meet the requirements of the standardized testing. The Department will reopen the regulations for amendment once this initiative has been developed further.</i></u></p> <p>* Recommends that the Compliance Agent of the employing PSS business be notified in writing by the Department when the Department disciplines an employee.</p> <p><u><i>The Department agrees and has amended the language</i></u></p>
<p>Howard Simmons</p>	<p>* Recommends that the Department exempt out-of-state electronic employees from the criminal history records search. One idea is make them dispatchers who help with the monitoring duties.</p> <p><u><i>This would require legislative action.</i></u></p>

<p>Brad VanLaer</p>	<p>* Favors the licensing of Locksmiths.</p> <p>* Suggests that the Department consider the training/courses offered by the Associated Locksmiths of America (ALOA) certification called a CRL (Certified Registered Locksmith) as acceptable training in lieu of the current 18-hour course offered by a Certified Private Security Services Training School.</p> <p><u>If the training meets or exceeds the compulsory minimum training standards, this training would qualify for a partial training exemption.</u></p>
<p>Richard Crane</p>	<p>* Recommends that DCJS keep the fingerprint and background checks and issue a photo ID for all non-firearm companies that are regulated by DCJS.</p> <p><u>Criminal history information is destroyed according to retention policy. Photo identification registrations are issued to all registered personnel, armed or unarmed.</u></p> <p>* Opposes the training requirements for alarm companies.</p> <p><u>Training is required in order to ensure that individuals providing electronic security services have received minimum training in the services that they provide, in addition the training provides them with instruction to assist them with maintaining compliance with the governing statutory and regulatory requirements.</u></p>
<p>Chuck Tobin AT-RISK</p>	<p>* Recommends that 6 VAC 20-171-395 – Entry Level Carbine Training be added to the regulations.</p> <p>* Proposes the following information and suggests that the Department develop minimum qualification standards for long guns or carbines. During the events of September 11<sup>th</sup> and for periods afterwards, many security companies equipped themselves with carbines as opposed to shotguns to bypass regulatory requirements in respond to the instant needs of the situation. It is not unrealistic to believe that the industry may again be faced with a similar situation requiring security officers to carry long guns or carbines. As a result, a qualification program should be considered to ensure a minimum qualification has been met. Contrary to other submittals, we do not believe that the .223 caliber is the only functional caliber. Many law enforcement agencies have utilized pistol calibers with great success.</p> <p><u>The Department is recommending entry-level and in-service patrol rifle training and range qualification requirements.</u></p>
<p>Bill Scouten VIP Security School</p>	<p>* Suggests that the Private Security Services regulations combine the categories “Unarmed” and “Alarm Respondent” because the training is the same.</p> <p><u>The categories of registration are defined by Code under 9.1-138. Any amendments would require legislative action.</u></p> <p>* Suggests the regulations indicate that applications are valid for 90 days.</p> <p><u>The Department inserted language under 6 VAC20-171-30 that fingerprint processing applications are valid for 120 day period.</u></p>
<p>Bill Scouten VIP Security School</p>	<p>* Recommends that the regulations include a provision for “adding” a weapon once an individual has previously qualified with a different weapon.</p> <p>Example, go to Range on a scheduled Range Date for a school and qualify, school then issues a TC form for the new weapon indicating Range Only under 07R block on the TC form</p>

<p>Bill Scouten VIP Security School</p>	<p><u><i>This information is already captured on the Department issued training completion form.</i></u></p> <p>* Suggests that in-service training must it be completed within 24 months of initial training or within 24 months of expiration of card?</p> <p><u><i>The regulations currently specify that in-service training must be completed within the 24 months period of registration (6VAC20-171-360)</i></u></p>
<p>Bill Scouten VIP Security School</p>	<p>* Recommends that the regulations be clearer about a new person’s 90-day window for initial training. Question: does the window start on “day of hire” or “date” DCJS/PSS receives and processes their application?</p> <p><u><i>The 90 day period begins upon the day of hire. Within 90 days of submitting the fingerprint processing application.</i></u></p>
<p>Bill Scouten VIP Security School</p>	<p>* Suggests clearer explanation of the “Date of Hire”. Question: how does required to be regulated differ from regulated by the department?</p> <p><u><i>The Department feels the language is clear.</i></u></p>
<p>B.E. McCrory, Jr. PISA</p>	<p>* Recommends that the following verbiage be added in order to clarify and provide consistency: “Registration identification cards will be issued to every natural person registered by the Department indicating the category(s) of PSS personnel in which the individual is registered. If the Department will continue to issue “temporary registration letters” it will be referred to by that term”.</p> <p><u><i>The Department agrees and inserted the language “temporary registration letters.”</i></u></p>
<p>B.E. McCrory, Jr. PISA</p>	<p>* Recommends that the Department consider that “Certification identification cards” will be issued to every compliance agent and instructor certified by the Department indicating the category(s) in which the individual is certified. If the Department will continue to issue “temporary certification letters”, it will be referred to by that term.</p> <p><u><i>The Department inserted the language “temporary certification letters”. The Department issues certificates to certified individuals. Only registered personnel are required to show a photo ID. The costs associated with issuing photo ID to certified individuals (compliance agents, instructors) would result in an increase of fees, the department is considering issuing instructor ID cards.</i></u></p>
<p><b>6VAC20-171-10</b></p>	<p><b>Definitions</b></p>
<p>Martha Clancy</p>	<p>6 VAC 20-171-10. Definitions. These require legislation to be introduced in the 2009 General Assembly Session.</p> <p>“Armed” and all references to “access to a firearm in the performance of his duties” drop the word “immediate”. This standard was established as the intent of the Legislature when it amended the definition of Armed Security Officer.</p> <p>Business advertising material” add printed advertising material, and on websites.</p> <p>“Compliance agent” means a natural person designated by a principal of the licensed PSS business to assure the compliance of the business and each of its employees with all provisions of the Code of Virginia and this chapter. Also to be used in all other sections of these Regulations.</p> <p><u><i>Requires legislative action.</i></u></p>

<p>Chuck Tobin AT-RISK  PSSAB Training Committee</p>	<p>* Suggests that definition of "Personal protection specialist" means any natural person who engages in the duties of providing close protection to any person (s) including security drivers, bodyguards, executive protection agents or security specialists consulting on the personal security needs of any individual or group of individuals</p> <p>Comments: Complaints have been received from various members of the PPS registration category relative to clarifying what services were regulated. This was particularly noted by Mike Maris, a PPS agent who responded to our attempts to complete a PPS job task analysis in 2004. Much of the concern is directed at limousine companies that sell "security drivers" to clients with no formal training, screening or regulation on this category. Additionally, we have encountered many people conducting executive surveys/consulting for executive protection offering advise to their clients on executive protection within the Commonwealth, but are currently operating unregulated.</p> <p><u>Requires legislative action.</u></p>	
<p>Chuck Tobin AT-RISK</p>	<p>*Suggests the word "consulting" be added to the definition of "Private security services business" means any person engaged in the business of consulting, providing, or who undertakes to provide, armored car personnel, security officers, personal protection specialists, private investigators, couriers, security canine handlers, alarm respondents, central station dispatchers, electronic security employees, electronic security sales representatives or electronic security technicians and their assistants to another person under contract, express or implied.</p> <p>Comments: The absence of the term "consulting" leaves room for people to conduct and oversee security services operations without ever obtaining a registration.</p> <p><u>Requires legislative action.</u></p>	
<p>Chuck Tobin AT-RISK</p>	<p>*Suggests that the definition of "Private security services training school" means any person certified by the department to provide instruction in (add) private security subjects for the public and for the training of private security services business personnel in accordance with this chapter.</p> <p>Comments: Many organizations offer training to the public such as security and personal safety, workplace violence and the like but offer this training with no regulation or credentialing. As a result, there are few means in place for a client to validate the capability of an organization or to determine that they are legitimate. By requiring organizations to obtain their Training School certification, the industry will be better positioned to provide quality instruction to the general public and hopefully avoid the delivery of poor or incorrect instruction.</p> <p><u>Requires legislative action.</u></p>	
<p><b>6VAC20-171-20</b></p>	<p><b>Fees</b></p>	
<p>Virginia Burglar and Fire Alarm Association (VBFAA)  John K &amp; Susan DellaPenta, Certified Training Academy  Martha Clancy</p>	<p>Objects to any fee increases. With respect to 6 VAC 20-171-20 Fees, the Virginia Burglar and Fire Alarm Association will object to all price increases in an aggressive fashion.</p> <p>Objects to any fee increases</p> <p>Objects to any fee increases</p> <p><u>Pursuant to §9.1-142, the Department may levy fees that are sufficient to cover the expenses for administration and operation. The Department is recommending an option to apply for an initial one year license in order to reduce the initial fee requirements. There has been no increase to licensing or registration fees in this regulatory action.</u></p>	

<p>Martha Clancy</p>	<p>* Favors that the regulations keep the current "reinstatement period" in place. <i><u>The reinstatement procedure has been left in place.</u></i></p>
<p>Bill Scouten VIP Security School</p>	<p>* Recommends that the regulations be corrected to state, "the reinstatement is \$10" instead of 50% of the cost of the application. <i><u>The reinstatement fee is 50% of the application fee. The only application with a \$10.00 reinstatement fee is a registration based on the \$20.00 application fee. A business license reinstatement fee is \$250.00 based on the \$500.00 application fee.</u></i></p> <p>* Recommends the a statement be added to reference training not completed on/before as well as application not received. <i><u>The commenter did not reference the specific regulation.</u></i></p>
<p><b>6VAC20-171-30</b></p>	<p><b>Fingerprint processing</b></p>
<p>Travis Palmer Delta Investigations</p>	<p>Change to Each person applying for licensure as a private security services business, including principals, supervisors or certification as a private security services training school or certification as a compliance agent, or private security instructor, or a private security registration in any category pursuant to 6 VAC 20-171-120 shall submit to the department:</p> <p>*Included in the registration categories. <i><u>A private security services registrant is defined in 6 VAC 20-171-10. The Department feels that the language is clear and there is no additional need to include references for the application process for registrants in 6VAC20-171-120. Doing this would require the department to add references throughout the entire regulations for consistency.</u></i></p>
<p>John K &amp; Susan DellaPenta, Certified Training Academy</p>	<p>* Suggests that the regulations include a cogent process, by which personnel from a temporary agency might be used, such as: fingerprinted on the date of hire trained by the 90<sup>th</sup> day registered by the 120<sup>th</sup> day; or removed from the company by the 91st day.</p> <p>Comments: Richmond Alarm – Alarm monitoring companies have a high turnover rate and a long training period, often 160 hours or more. It is critical to replace a terminated employee quickly. Monitoring company employee needs strong clerical skills, which are easily found among temporary agency’s pool of employees and without the temporary agency advertising for the position. The idea would be to ask for an agency to send an employee that has necessary skills to the alarm company and the alarm company to process papers with DCJS, same as a direct hire. Eventually, if the training of the temp employee goes well, the alarm company hires the employee directly. <i><u>This would require a legislative action. Temporary agencies that provide employees for regulated private security services are considered a private security services business and are required to be licensed according to the Code.</u></i></p>

<p>John K &amp; Susan DellaPenta, Certified Training Academy</p>	<p>* Suggests the language be clearer in 6 VAC 20-171-30. B. Fingerprint Processing to add the following sentence: the fingerprint card, processing application and fee shall be submitted to the department not later than one business day following the date of hire.”  <u>The Code states that no person shall be employed until he has submitted his fingerprints to the Department to be used a National Criminal Records search and a Virginia Criminal History Records search. Fingerprints must be submitted upon date of hire in a regulated private security services category.</u></p>
<p>Martha Clancy</p>	<p>* Suggests that 6 VAC 20-171-30.A (1) Fingerprint Processing be amended to reflect: One completed fingerprint card.  * Favors that proof of United States citizenship or Legal Resident Alien status be required for initial licensure, registration and certification as well as for each renewal – for clarification.  <u>The language has been amended.</u></p>
<p>Bill Scouten VIP Security School</p>	<p>* Recommends that the regulations indicate that fingerprints are valid for 90-days.  <u>Language has been inserted that reflects the fingerprint processing applications are valid for 120 days.</u></p>
<p>Bill Scouten VIP Security School</p>	<p>* Suggests the following: “On or before the date of hire”...(drop the term first).  <u>The Department feels that the language is clear and no amendment is needed.</u></p>
<p>Jennie McLamb, Omnisecc  Bill McCrory, Jr. PISA and Bill Scouten, VIP Security</p>	<p>Change: “Two [One] completed fingerprint card[s] provided...”  <u>The language has been amended.</u></p>
<p>Jennie McLamb, Omnisecc and Bill Scouten, VIP Security School</p>	<p>*Suggests: C. [Fingerprint cards found to be unclassifiable will be returned to the applicant. If a fingerprint card is found to be unclassifiable, the applicant shall be so notified in writing.] Action on the application will be suspended pending the resubmittal of classifiable fingerprint cards. The applicant [shall be so notified in writing and] shall submit [a] new fingerprint card[s] and the applicable, nonrefundable fee to the department before the processing of his application shall resume. However, no such fee may be required if the [rejected fingerprint cards are unclassifiable notification letter is] included and attached to the new fingerprint cards when resubmitted and the department is not assessed additional processing fees.  * Also suggests, to add time frame for new print cards to be returned to DCJS/PSS  <u>The Department agrees and inserted language under 6VAC20-171-30A to reflect the current procedure.</u></p>
<p>Bill Scouten VIP Security School</p>	<p>(30D)* Asks: Does the department actually notify the Compliance Agent?  <u>If the individual is employed and the Department is aware of the employer, the compliance agent of the business in notified.</u></p>
<p><b>6VAC20-171-40</b></p>	<p><b>Repealed Section</b></p>



<p>Chuck Tobin AT-RISK</p>	<p>* Recommends that the Department considers that reinstatement of the VSP-167 or other similar instant check for categories with a grace period.  <i><u>This would require legislative action. This requirement was removed in 2003 from the Code, when unarmed security officers became registered and were required to submit for a fingerprint based criminal history check. The process that the Department utilizes has greatly increased the turn around time in receiving results from the State Police. It would be a business decision if a business chooses to institute an internal process for a VSP167.</u></i></p>
<p><b>6VAC20-171-50</b></p>	<p><b>Initial Business License Application</b></p>
<p>Martha Clancy</p>	<p>* Suggests that Initial business license application 6 VAC 20-171-50. B.2. and 60.C.2. ... policy of general comprehensive liability insurance with minimum coverage of \$ 1 million aggregate including broad form liability coverage endorsement.  <i><u>There is no documentation or studies that support the increase of the minimum coverage requirements for general liability insurance.</u></i></p>
<p>Bill Scouten VIP Security School</p>	<p>* Asks for clarification of 6 VAC 20-171-50.B(1), Is this required if person has been previously fingerprinted for another category i.e. Security Officer  <i><u>The Department included language under 6VAC20-171-30 in which fingerprint applications would be active for 120 days. If the person had been fingerprinted for a registration within 120 days of submitting the business license application, new fingerprints would not be required.</u></i></p>
<p>Jennie McLamb, Omnisecc  Bill Scouten, VIP Security School, Chuck Tobin, AT-RISK</p>	<p>* 6 VAC 20-171-50.B(5) Suggests to add "location" or "address".  5. A physical [location] in Virginia where records required to be maintained by the Code of Virginia and this chapter are kept and available for inspection by the department. A post office box is not a physical [location];  <i><u>The Department has recommended that this section be deleted because businesses are required to produce their records upon request of the Department under the Administrative requirements and standards of conduct. Many companies are now utilizing electronic records and it was a hardship on out of state companies to maintain a physical location in Virginia.</u></i></p>
<p>Travis Palmer</p>	<p>6VAC20-171-50B(6) * Favors that the license application language be changed to:...the designation of at least one individual who is certified, or eligible for certification, as compliance agent pursuant to 6 VAC 20-171-70, who is not designated as a compliance agent for any other licensee;  <i><u>The Department does not agree that a change is needed. The current language is clear.</u></i></p>
<p><b>6VAC20-171-70</b></p>	<p><b>Compliance Agent training and certification</b></p>
<p>John K &amp; Susan DellaPenta,  Certified Training Academy</p>	<p>* Suggests that the Department consider amending: 6 VAC 20-171-70 (A) (1) Compliance Agent Training and Certification, "Be a minimum of 21 years of age".  <i><u>The Department does not feel that any change to the age requirement has been justified.</u></i>  * Recommends the elimination of the current 3/5-year qualifications in the Code of Virginia and relevant regulations.  <i><u>A change to the qualifications for Compliance Agents would require legislative amendment.</u></i></p>

<p>Martha Clancy</p>	<p>* Suggests that 6 VAC 20-171-70. A.2. and B.3. be amended, “Have (i) three years of managerial or supervisory experience in a PSS business, a federal, state, or local law enforcement agency, a unit of the United States Armed Forces, or in another field or (ii) five years experience in a PSS business, ... agency, a unit of the United States Armed Forces....”</p> <p><u>A change to the qualifications for Compliance Agents would require legislative amendment.</u></p> <p>* Suggest that 6 VAC 20-171-70.C. be amended to allow Certified PSS Training Schools to be authorized to provide Compliance Agent training to ensure availability and convenience.</p> <p><u>The compliance agent training is specific to Code and Regulations under the enforcement authority of the Department. This training is provided by the Department.</u></p>
<p>Bill Scouten</p> <p>VIP Security School,</p> <p>B.E. McCrory, Jr. PISA</p>	<p>-6VAC20-171-70C –</p> <p>Needs to be updated since initial training is now available through sources other than DCJS/PSS.</p> <p>Must be completely rewritten</p> <p><u>The compliance agent regulatory processes have been amended.</u></p>
<p>Bill Scouten</p> <p>VIP Security School</p>	<p>6VAC20-171-70D</p> <p>Why are we talking about in-service in this section?</p> <p><u>This section has been removed.</u></p>
<p><b>6VAC20-171-80</b></p>	<p><b>Initial training school application</b></p>
<p>Martha Clancy</p>	<p>* Recommends that Initial Training School Applications 6 VAC 20-171-80.B.2. and 90.C.2. Same insurance requirements as PSS businesses above. ...policy of general comprehensive liability insurance with minimum coverage of \$ 1 million aggregate including broad form liability coverage endorsement.</p> <p><u>There is no documentation or studies that support the increase of the minimum coverage requirements for general liability insurance.</u></p>
<p>Bill Scouten</p> <p>VIP Security School</p>	<p>* Needs corrected, 6 VAC 20-171-80B3 Line 2 to serve as a ervice agent (misspelled)</p> <p><u>This error was evidently in another document. The official regulations do not reflect this error.</u></p>
<p><b>6VAC20-171-90</b></p>	<p><b>Renewal training school application</b></p>
<p>Martha Clancy</p>	<p>* Recommends that Renewal Training School Applications 6 VAC 20-171-80.B.2. and 90.C.2. Same insurance requirements as PSS businesses above. ...policy of general comprehensive liability insurance with minimum coverage of \$ 1 million aggregate including broad form liability coverage endorsement.</p> <p><u>There is no documentation or studies that support the increase of the minimum coverage requirements for general liability insurance.</u></p>

<p>Bill Scouten VIP Security School</p>	<p>* Suggests that 6 VAC 20-171-90.B6 and C3 should read the same.</p> <p>Comments: One talks about individual as training director who is not and certified as an instructor while the other talks about at least one certified instructor as training director who has completed the training.</p> <p><u>There is no current section numbered 90.B6. No response needed.</u></p>
<p>Bill Scouten VIP Security School</p>	<p>* Suggests that 6 VAC 20-171-90. E Drop since it seems to be covered in item A.</p> <p><u>Section A refers to reinstatement fees. Section E refers to the reinstatement procedure.</u></p>
<p><b>6VAC20-171-100</b></p>	<p><b>Initial instructor application</b></p>
<p>Martha Clancy</p>	<p>* Suggests Initial Instructor Application 6 VAC 20-171-100. A.4. be amended to, "Have (i) three years of managerial or supervisory experience in a PSS business, a federal, state, or local law enforcement agency, a unit of the United States Armed Forces, or in another field or (ii) five years experience in a PSS business, ... agency, a unit of the United States Armed Forces.</p> <p><u>The current regulations already allow for law enforcement experience with the military police as well as the federal government which would include units of the United States Armed Forces.</u></p>
<p>Chuck Tobin AT-RISK</p>	<p>* Recommends that under 6 VAC 20-171-100 (A) that an instructor should maintain registration in the categories they are certified to instruct.</p> <p>Comments: It is believed that it is important that for an instructor to continue to offer current, best practice information they should maintain a current registration. Thereby ensuring they continue to participate in operational assignments or attend in-service training from professional organizations such as ASIS. Currently, GI's must only take in-service training in how to be a good instructor.</p> <p><u>The Department did not agree that all instructors should be required to maintain a registration, but did include a provision that instructors must complete an additional 2 hours of professional development for topics related to each category of instructor certification during the period of certification.</u></p>
<p>Travis Palmer</p>	<p>* Suggests that the Department Omit B.6 – previously stated in A.5; and other sections of the regulations and application, i.e. fingerprint processing application and fingerprint cards.</p> <p><u>Section A specifies eligibility. Section B specifies what documents must be filed with the Department.</u></p>
<p>Bill Scouten VIP Security School</p>	<p>* Notes that 6 VAC 20-171-100. C(1) and C(3) appear to have duplicate verbiage.</p> <p><u>The Department disagrees, C3 provides additional information in regard to a firearms instructor.</u></p>
<p>Bill Scouten VIP Security School</p>	<p>* Notes to drop word and...6 VAC 20-171-100. C (2)</p> <p><u>The language has been amended.</u></p>
<p><b>6VAC20-171-120</b></p>	<p><b>Initial registration application</b></p>

Martha Clancy	<p>* Suggests that the Initial Registration Application 6 VAC 20-171-120.A. Reference to firearms should be moved to separate Article dealing with Firearms Endorsement. ... must have a valid registration “and” firearms endorsement ... of his employer, and be in compliance with all requirements of §18.2-308 of the Code of Virginia.</p> <p><u>Provisions for firearms endorsement has been inserted under 6 VAC20-171-140.</u></p> <p>* Recommends that 6VAC 120-171-120.E. Delete reference here and in all other places of DMV and insert DCJS.</p> <p><u>The language has been stricken.</u></p>
Travis Palmer	<p>* Suggests that 6 VAC 20-171-120. A be amended to say: “Individuals who carry or have access to a firearm while on duty must have a valid firearm endorsement card. If carrying a handgun concealed, the individual also have a (i) valid concealed weapons permit pursuant to 18.2.308 of the Code of Virginia, and (ii) written permission of his employer to carry while on duty”.</p> <p><u>The Department feels no further amendment is needed and that the current language is clear.</u></p>
Bill Scouten VIP Security School	<p>(see page 35) #11 – both read the same in regards to Concealed Handgun. One uses the term handgun and written permission while the other talks about firearm and expressed authorization.</p> <p><u>The commenter did not specify what regulation he is referring to. No response needed.</u></p>
Travis Palmer	<p>* Suggests that 6 VAC20-171-120. B (2) delete the verbiage “including firearms endorsement if applicable.</p> <p><u>The Department feels this language is necessary to ensure clarify of qualifications for armed registration categories.</u></p>
Chuck Tobin AT-RISK	<p>* Suggests that 6 VAC 20-171-120. D (1) read:</p> <p>“Fingerprint cards have been submitted pursuant to 6 VAC 20-171-30; instant criminal history checks have been submitted pursuant to...and...”</p> <p>Comments: This change was mentioned above in the VSP-167 reinstatement.</p> <p>It is suggested that the VSP-167 is reinstated due to the necessity of several registration categories, such as security officers, to place them on post immediately after the submittal of fingerprints. Unfortunately, the results from the fingerprints are not received for up to 30 days, leaving the potential that a felon could work within a facility for a period of time. The VSP-167, though limited in reach, offered the client the knowledge that they were not provided with a criminal in their security operation.</p> <p><u>This would require legislative action. The requirement to submit a VSP167 was removed in 2003 from the Code, when unarmed security officers became registered and were required to submit for a fingerprint based criminal history check. The process that the Department utilizes has greatly increased the turn around time in receiving results from the State Police. It would be a business decision if a business chooses to institute an internal process for a VSP167.</u></p>
Travis Palmer	<p>* Suggest that 6 VAC 20-171-120.E be deleted.</p> <p><u>The reference to DMV has been stricken.</u></p>
<b>6VAC20-171-130</b>	<b>Renewal registration application</b>

<p>T. Palmer</p>	<p>* Suggests that 6 VAC 20-171-130. A be amended to read: “after the expiration date shall be subject to all applicable, nonrefundable renewal fees plus reinstatement fees pursuant to 6 VAC20-171-180.”</p> <p><u>Language was inserted in section 30 E.</u></p>	
<p>John K &amp; Susan DellaPenta, Certified Training Academy</p>	<p>* Suggests that 6 VAC 20-171-130 (A) Registration Renewal be amended to read: “Applicants for registration renewal shall meet all requirements and submit their application at least 30-days prior to the expiration.”</p> <p>Comments: The idea here is to give DCJS 30-days processing time while reminding the applicant to get their training prior to submitting the application. In a round-about way, it points out that there other requirements beyond submitting the application, thereby encouraging the practitioner to read on to see exactly what must be done to renew in a timely manner.</p> <p><u>The Department concurs and the language has been amended.</u></p>	
<p>Bill Scouten VIP Security School</p>	<p>Within 12 months of expiration of credential (see pg 40, 1a and pg 41, top, #2) same verbiage pg 41, top, item b.</p> <p><u>The commenter did not specify which regulation he is referring to. No further response needed.</u></p>	
<p>Travis Palmer</p>	<p>* Suggests that 6 VAC 20-171-130.C (2) be amended to read: “Individuals applying for renewal as armored care personnel submit fingerprint cards pursuant to 6 VAC20-171-30; and...”</p> <p><u>The Department feels that the current language is clear.</u></p>	
<p>Travis Palmer</p>	<p>* Suggests that 6 VAC 20-171-130.C (4) be deleted.</p> <p><u>This requirement is for armed registration categories.</u></p>	
<p>Travis Palmer</p>	<p>* Suggests that 6 VAC 20-171-130.D be deleted.</p> <p><u>All references to DMV have been stricken.</u></p>	
<p>Travis Palmer</p>	<p>* Suggests that 6 VAC 20-171-130.E be deleted, as it is redundant to paragraph A</p> <p><u>The Department feels this language is necessary.</u></p>	
<p><b>6VAC20-171-180</b></p>	<p><b>Reinstatement</b></p>	
<p>John K &amp; Susan DellaPenta, Certified Training Academy, VBFAA</p>	<p>* Recommends that the department consider revising this entire section of the regulations to include the following elements – 6 VAC 20-171-180, Reinstatement: “permit licensees to operate after the submission of the renewal application; permit schools to continue operation after the submission of the renewal application; permit certified personnel to work after the submission of the renewal application; permit registrants to work after the submission of the renewal application  operate/work for up to 30-days while completing the reinstatement process; that the person or business is still subject to the regulations  that the person or business is still subject to the § 9.1-138 et seq. of the Code of Virginia during the reinstatement period; that there is no reinstatement period on expired firearms endorsements”</p>	

	<p>Comments: This is intended to offer a compromise on a very intense issue for our members (other Virginia regulated trades allow reinstatement for up to a year). This would also make the reinstatement period truly consistent (with compliance agents).</p> <p>(VBFAA) Certainly we understand that our public safety related work differentiates us from other trades; however, this compromise permits the enterprise and personnel to continue while holding them accountable</p> <p><u>The Department agrees and has included the appropriate language.</u></p>
<p>Bill Scouten VIP Security School</p>	<p>* Suggests that 6 VAC 20-171-180. C should make reference to Article #4, Training Exemptions (in case person is eligible).</p> <p><u>The Department does not agree that an additional reference to the training exemptions is necessary.</u></p>
<p><b>6VAC20-171-190</b></p>	<p><b>Renewal extension</b></p>
<p>John K &amp; Susan DellaPenta, Certified Training Academy, VBFAA</p>	<p>* Suggests that 6 VAC 20-171-190.A be amended to state: 3. "Military or Foreign Service, or foreign assignment."</p> <p><u>The Department does not agree that individuals should receive an extension when on a foreign assignment that is not the result of military, foreign service or an emergency temporary assignment.</u></p> <p>* Also suggests, that in paragraph B (3), the regulations use the words "government orders" which would also need to be amended with language, such as: "...or letter from the compliance agent stating the date the registrant's departure and return."</p> <p>Comments: More and more private sector security practitioners are being assigned to projects abroad and should have their work respected, on par with military and government civil service.</p> <p><u>The Department did add language to B3 to include documentation of emergency temporary assignments which could include documentation from the business</u></p> <p>* Suggests that 4. state: "Any emergency temporary assignment of private security registered or certified personnel for purposes of natural disaster, homeland security or documented threat."</p> <p><u>This language was amended to include the recommendation.</u></p>
<p>John K &amp; Susan DellaPenta, Certified Training Academy, VBFAA</p>	<p>* Suggests that 6 VAC 20-171-190.E be amended to state:</p> <p>Add to the current language of paragraph "E" "...except as provided for emergency temporary assignments in paragraph A. (4)."</p> <p>Paragraph E is in conflict with sub-paragraph 4, in that there can be an emergency extension of the expiration date during which the personnel can work until they can achieve training. For instance in September 2003, a hurricane and tornado inflicted severe damage on the Richmond area, as well as other parts of the state, causing a 4-6 month backup in service calls to restore electronic security equipment owing to damages. In a situation such as this, it is in the interest of the public safety (§ 9.1-141.A.) for these men and women to restore electronic security services than to attend in-service training session.</p> <p><u>The Code requires licensure, certification and registration. The Department has the authority to grant 30 day emergency exemptions for these situations. The Department</u></p>

	<u>does not have the authority to allow individuals or businesses to provide private security services without the proper credentials or an emergency exemption.</u>	
Martha Clancy	<p>* Strongly suggests that 6 VAC 20-171-190. Renewal Extension read, "The Department shall issue a letter to the business, school, or individual stating the conditions required for renewing the license, registration, or certification."</p> <p>* Asks consideration to change the current provision regarding an individual serving in the United States Armed Forces so that he/she may have his/her registration renewed upon return to Virginia. Instead of prior notification, the requirements might include filing a registration renewal application within 90 days of return, completion of in-service training, and a copy of military orders. DMV accepts this process for drivers' licenses and vehicle registrations.</p> <p><u>The Department included language under B1 that would allow this requirement to be waived based on an evaluation of the justification for waiver.</u></p>	
<b>6VAC20-171-200</b>	<b>Denial, probation, suspension and revocation</b>	
Travis Palmer	<p>* Suggests that 6 VAC 20-171-200(A) be changed: as defined in Article 1 (18.2-247, et seq.) of Chapter 7 of Title 18.2 of the Code of Virginia, or prohibited sexual behavior as....</p> <p><u>The Department feels no change is necessary and that the current language is clear.</u></p>	
Martha Clancy	<p>* Suggests that 6 VAC 20-171-200.D. be amended to read: "The Department may deny licensure, registration, or certification for other just cause."</p> <p><u>The Department agrees. The language has been amended.</u></p> <p>* Recommends that 6 VAC 20-171-200.F. The Compliance Agent of the PSS Business or Training Director of a PSS Training School by which a disciplined registrant or certified individual is employed shall be notified in writing by the Department as to the discipline imposed and the nature of the violation.</p> <p><u>The Department concurs. This provision has been inserted.</u></p>	
<b>6VAC20-171-220</b>	<b>Business administrative requirements</b>	
Bill Scouten VIP Security School	<p>* 6 VAC 20-171-220.A (10) Line 3, add compliance agent (is missing now)</p> <p><u>The Department feels the current language is clear.</u></p>	
Bill Scouten VIP Security School	<p>Asks: A-12 Isn't this requirement met in A-8, "maintain at all times-fingerprint processing application was submitted"</p> <p><u>A8 refers to documentation, A12 refers to the submittal of required fingerprint cards to the Department.</u></p>	
Travis Palmer	<p>* Recommends that 6 VAC 171-220. A. (15) be changed to read: "On a form provided by the department and within 10 calendar days of receiving knowledge of an incident, submit a report of the incident in which any registrant has..."</p> <p><u>The language has been amended.</u></p>	

<p>Bill Scouten VIP Security School</p>	<p>* Comment on 6 VAC 20-171-220.A (19): and page 25, item 10d, should read the same. <u>Unable to clarify what the commenter is referring to.</u></p>
<p>Bill Scouten VIP Security School</p>	<p>* Comment on 6 VAC 20-171-220.A (26): and pg 25, item 15 should be the same <u>Unable to clarify what the commenter is referring to. There is no section numbered 220A(26).</u></p>
<p>Bill Scouten VIP Security School</p>	<p>* Comment on 6 VAC 20-171-220.A (6): why 15 days when most other requirements are 10 days? <u>The Department does not feel a change is necessary.</u></p>
<p><b>6VAC20-171-230</b></p>	<p><b>Business standards of conduct</b></p>
<p>John K &amp; Susan DellaPenta, Certified Training Academy, VBFAA  Richmond Alarm (paragraph 16 only)</p>	<p>* Suggests that regulation 6 VAC 20-171-230 Business Standards of Conduct be amended to read: Add to the current language of paragraph 16: This shall not apply to audio or video monitoring verification where there is reasonable information to believe that a crime is in progress. <u>The regulations currently allow for a waiver of this requirement upon written authorization from the alarm user.</u>  *Also recommends that the language in 6 VAC 20-171-230 be amended to read: Add to the current language of paragraph 19: "...or the seal of any political subdivision of the Commonwealth..." Comment: This amendment makes the paragraph clearer in its content and more consistent with similar statements in the regulations. <u>The Department agrees. The language has been inserted.</u></p>
<p>Martha Clancy</p>	<p>* Recommends that the verbiage in 6 VAC 20-171-230. (and in all other places with this same wording) be amended to include:  18. Utilize vehicles for private security services using or displaying a flashing amber light only as specifically authorized by the Code of Virginia §46.2-1025.9. <u>The Department agrees. The language has been inserted.</u>  27. "Do not conduct private security business under a fictitious or assumed name of a private security services business not on file with the Department of Criminal Justice Services. Current verbiage implies that use of "pretext" is otherwise legal, when it can be illegal under certain circumstances, and specifically under several federal laws. The revised wording conveys the necessity of registering a DBA with DCJS". <u>The Department agrees. The language has been inserted.</u></p>



<p>Travis Palmer</p>	<p>* Suggests that 6 VAAC 20-171-230.A(4)a. be amended to read: “A licensee shall not employee, or otherwise utilize, those individuals that do not possess a valid registration card issued by the department, accept as provided in this chapter, indicating the duty category(ies) of registration pursuant to the Code of Virginia. Individuals employed for strictly administrative/clerical duties are exempt”.</p> <p><u>The Department does not feel an amendment is necessary. The current language is clear.</u></p>
<p>Travis Palmer</p>	<p>Asks for clarification of 6 VAC 20-171-230.A. 5...“contractor’s or subcontractor’s license issued by the department...Is this construed as the “firm license/business license” ? Should be defined if otherwise.</p> <p><u>This language prohibits a business from contracting or subcontracting with other businesses or individuals who are not properly licensed. This prohibits a business from hiring individuals under a 1099 to provide private security services.</u></p>
<p>Travis Palmer</p>	<p>* Suggests to remove “and acting” in 6 VAC 171-230.A (9).</p> <p><u>The language in the section is correct.</u></p>
<p>Chuck Tobin AT-RISK</p>	<p>* Recommends a change in regulation 6 VAC 20-171-230 (A) to read: “28 Not act as or be a certified Private Security Services Business for undisclosed persons who directly or indirectly controls the operation of the Private Security Services Business”.</p> <p>Comment: This is to prevent undisclosed persons from directing a companies efforts without having their fingerprints submitted to DCJS. Such a person may have had their certification/license/registration previously revoked but continue to refer business to an associate for a “cut” of the work. Meanwhile, continuing to maintain their relationship with the client and conduct business illegally.</p> <p><u>The Department agrees. New language has been inserted.</u></p>
<p><b>6VAC20-171-240</b></p>	<p><b>Compliance agent administrative requirements and standards of conduct.</b></p>
<p>John K &amp; Susan DellaPenta, Certified Training Academy, VBFAA ***** Martha Clancy</p>	<p>* Favors eliminating: 6 VAC 20-171-240 (A) (9) Compliance Agent.</p> <p>Comment: The purpose here is to allow the compliance agent to serve more than one business licensee.</p> <p>Comment: An individual may function competently as Compliance Agent for more than one business entity.</p> <p><u>The Code states that a compliance agent must be employed by a licensed business.</u></p>
<p>Jennie McLamb, Omnisec</p>	<p>* Suggests that 6 VAC20-171-240.A (10d) include the verbiage to add “or electronic images”.</p> <p>Example: b. Maintain documentation [or electronic images] for all employees or persons otherwise utilized that verifies compliance with requirements pursuant to the Code of Virginia and this chapter; and</p> <p><u>The Department has included the definition for electronic images under 6VAC20-171-10 which would include the documentation in this section.</u></p>

Jennie McLamb, Omnisecc	<p>* Recommends 6 VAC 20-171-240.A.2. read: "Maintain at all times with the department his mailing address. Written notification of any change of address shall be [in writing and] received by the department no later than 10 days after the effective date of the change".</p> <p><u>The language has been amended.</u></p>
Travis Palmer	<p>* Asks for clarification of 6 VAC 20-171-240A.(10d): Ensure that all regulated employees carry the state issued registration card, or letter of temporary registration, while on duty.</p> <p>What is a "certification card"?</p> <p><u>This language has been stricken.</u></p>
<b>6VAC20-171-250</b>	<b>(Training Schools) – Administrative Requirements</b>
Travis Palmer	<p>* Suggests 6 VAC 20-171-250 (Title) be changed to: Training school Administrative Requirements</p> <p><u>The Department agrees, the language has been inserted.</u></p>
T. Palmer	<p>* Suggests that 6 VAC20-171-250-21 be changed to: "and within 10 days of an incident, submit a report of the incident in which any instructor..."</p> <p><u>The language has been amended.</u></p>
Bill Scouten VIP Security School	<p>* Recommends to delete 6 VAC 20-171-250. (19c) because it is covered in A(5).</p> <p><u>The Department feels this language is necessary to ensure schools maintain a current list of subject matter specialists. A5 only requires that the school contact the Department when the specialist is first utilized.</u></p>
Bill Scouten VIP Security School	<p>* Suggests that the Department maybe add-to notify the department within 24 hours of the incident and then follow up within 10 days with written report-see pg 34 item 5 at top of page – 6VAC20-171-250 A(21)</p> <p><u>The Department does not agree that this is necessary.</u></p>
<b>6VAC20-171-300</b>	<b>Private Security training session.</b>
Martha Clancy	<p>* Recommends that 6 VAC 20-171-300. Training Session be amended as follows:</p> <p>B.5. A written examination in English shall be administered at the conclusion of each entry-level training session.</p> <p><u>The Department feels this is not within their authority to enforce and specific justification has not been provided that would support an amendment. This is a business decision by the school.</u></p> <p>C.2. Such training should be completed within 60 days after the completion of the training session or at the next available session offered by the training school at the discretion of the training director.</p>
Chuck Tobin AT-RISK	<p>* Strongly supports 6 VAC 20-171-300.(D) 7 that Computer based training may only be utilized for in-service training of certification categories.</p> <p>Comment: Current computer based training programs do not offer enough guarantee</p>

	<p>from fraudulent use nor do they offer the student substantial learning opportunities. This type of training must be better monitored or more thoroughly regulated. Training schools have little control over whether the person actually completing the training is the student being certified. In a formal school, the instructor can make acquaintance with the student and validate identity. Via internet training it is extremely feasible for a command center operator or supervisor to complete security officer in-service training for several of his/her officers. Secondly, by not positioning test questions throughout the period of study, students can skip to the testing material and test without reviewing the content.</p> <p><i>The Department is allowing for on-line training for in-service only.</i></p>
<p>Chuck Tobin AT-RISK</p>	<p>* Suggests that 6 VAC 20-171-300. (D) 2. be changed to add the following verbiage: Training sessions will be conducted by certified instructors or other individuals authorized to provide instruction pursuant to this chapter and must be “physically present for all periods of instruction”.</p> <p>Comment: This is too prevent instructors from conducting training sessions via the plug and play mentality where they punch in a tape and walk away for an hour. Meanwhile, students make a mockery of the content and do not obtain the level of instruction necessary</p> <p><i>The Department agrees, the language has been inserted.</i></p>
<p><b>6VAC20-171-310</b></p>	<p><b>Registered Personnel Administrative Requirements</b></p>
<p>John K &amp; Susan DellaPenta,  Certified Training Academy, VBFAA</p>	<p>* Recommends that 6 VAC 20-171-310 Registered Personnel Administrative Requirements be amended as follows:</p> <p>Add to the current language of paragraph 3: “...misdemeanors of moral turpitude; sex offense; drug offense or distribution or possession of imitation controlled substances; assault and battery; damage to personal property as defined in § 18.2-; firearms or any felony...”</p> <p>Comment: The current paragraph needs to be more specific and in line with § 9.1-139.J. The current language is too broad and can lead to frivolous administration for individuals, businesses and the department over minor offenses.</p> <p><i>The Department agrees and included a reference to the specific section of the Virginia Code.</i></p>
<p>Travis Palmer</p>	<p>* Suggests to change 6 VAC 20-171-310.A(2) to: “Maintain at all times with the department a mailing address and, if applicable, e-mail address and telephone number.</p> <p><i>The Department agrees. The language has been amended.</i></p>
<p>Travis Palmer</p>	<p>* Suggests to change to 6 VAC 20-171-310.A(3): “Inform the department and, if applicable, the private security services business employer, in writing within 10 days after pleading guilty or nolo contendere or being convicted of found guilty of any felony or misdemeanor”.</p> <p><i>The language has been amended and should address Mr. Palmer’s concerns..</i></p>
<p>Travis Palmer</p>	<p>* Suggests to change 6 VAC 20-171-310. A (4) to : “Inform the department and, if applicable, the private security services business employer, in writing within 10 days after having been found...”</p> <p><i>The Department does not feel the change is necessary. The language is clear.</i></p>
<p><b>6VAC20-171-320</b></p>	<p><b>Registered Personnel Standards of Conduct</b></p>

<p>John K &amp; Susan DellaPenta, Certified Training Academy, VBFAA</p>	<p>* Recommends that regulation: 6 VAC 20-171-320 Registered Personnel Standards of Conduct be amended to include the following:</p> <p>Amend to the current language of paragraph7: Have a valid registration or temporary registration reasonably accessible at all times while on duty once the authorization...</p> <p>Comment: The current language is "carry." Many of our industry members are installers and service people and are subjected to traversing attics and crawl spaces during the installation of electronic security equipment. The objective here is to allow them to keep the registration card in their vehicle where it will stay clean and less likely to be lost, but still reasonably retrievable if requested by one of the parties in paragraph 15 of this section.</p> <p>Richmond Alarm adds: An additional sentence could be added: "immediate access" means on the job site where the registrant is working (The words immediate access were taken from the definition of armed in these regulations).</p> <p><u>The Department does not feel an amendment is necessary, if an individual must have the card with him (vehicle, toolbox,etc.), but not physically on his person due to obvious reasons the department would consider the individual in compliance with the regulation.</u></p>
<p>Martha Clancy</p>	<p>* Recommends that 6 VAC 20-171-320. Registered personnel standards of conduct read:</p> <p>A.14. Engage in no conduct which shall mislead or misrepresent through word, deed, or appearance that a registrant is a law-enforcement officer or other government official.</p> <p><u>The Department agrees. The language has been amended.</u></p>
<p>Bill Scouten VIP Security School</p>	<p>* Recommends that 6 VAC 171-320.A (7) add the word "unarmed security officer."</p> <p><u>The language has been amended.</u></p>
<p>Bill Scouten VIP Security School</p>	<p>* Asks for clarification: 6 VAC 20-171-320.A (9) that references 9-1-140 of the Code of Virginia in regards to Armed Security Officers. If other "in house" employees who perform duties that are regulated by DCJS/PSS are exempt should they be included in this section?</p> <p><u>Armed security officers who work for proprietary businesses are not exempt from registration requirements. All other proprietary employees are not regulated by DCJS.</u></p>
<p><b>6VAC20-171-350</b></p>	<p><b>Entry Level Training (Registrations)</b></p>
<p>Landon T. White, Explosive Countermeasures International Incorporated</p>	<p>6 VAC 20-172-350 DETECTOR CANINE HANDLER EXAMINER CERTIFICATION</p> <p>A. Each person applying for certification as examiner shall meet the minimum requirements for eligibility:</p> <p>"Tenured membership/affiliation with an organization involved with certifying, training, and or setting standards for detection canines." This should not automatically qualify someone as an examiner. We need to keep experience involved with this statement. In almost all cases I am sure someone with membership in these organizations will have experience equal to or greater than the five years. But what if, in what I would consider to be rare, someone does not? By being a business one is affiliated with an organization. And by stating your purpose is for certifying, training, and or setting standards for detection canines, you have met this requirement.</p>

ECI feels that the DCJS recommended, "five years experience in explosive and/or narcotic detection with a federal, state, or local law-enforcement agency as well as two additional years as a trainer in detection canines". This experience should be required in addition to the above paragraph and not in lieu of.

Attached is ECIs recommendation regarding the training school minimum requirement. We recommended as an absolute minimum five weeks (200 hours); and only if we can not persuade you to follow the training minimum that is followed by most government agencies. For classroom training we recommend 50 hours of training. The practical/hands-on training we recommend is 150 hours. It is our understanding that DCJS was initially recommending 4 weeks, 1 week of classroom and 3 weeks of apprenticeship.

We understand that DCJS is establishing minimum training standards, but we need to keep in mind that people will be conducting searches for improvised explosive devices. How minimal should the training be? The above recommendation is the absolute minimum. We actually believe the minimum should be in keeping with the guidelines followed by most government agencies which is a training course of 8-12 weeks as a minimum for novice handlers.

These regulations stem from one bad apple approximately six or seven years ago. We do not want more of them to follow. If the standards are too minimal we will only encourage individual companies to branch out security services as an additional revenue avenue advertising that their services are "Certified and Regulated through DCJS." Most Federal Contracts stipulate a minimum of 1-2 years experience as an explosive detector dog handler in their solicitations. However, if a company in Virginia has no prior experience with detection canine companies, we feel they would assume being Licensed and certified by DCJS would qualify the handlers to perform services. If the minimum standards are too basic we will defeat the purpose of these regulations. Rather than cleaning up the industry, it would create a whole new industry of inexperienced handlers providing unsatisfactory protection to an unsuspecting public.

Where in the regulations will the standard for testing teams be? ECI has in the past recommended the standards of The United States Police Canine Association (USPCA) as a guideline for testing. Since that recommendation the ATF has entered into a partnership with the USPCA, The North American Working Dog Association (NAPWDA), The International Police Work Dog Association (IPWDA), and the National Police Canine Association (NPCA) to improve explosive canine standards. This partnership is still quite new but it may be worth exploring as we establish certification guidelines.

The Scientific Working Group on Dog and Orthogonal Detector Guidelines (SWGDOG) has also made recommended general guidelines for training, certification, and documentation pertaining to all canine disciplines. This group was initially tasked with establishing standards that would be nationwide. I would encourage you to review their website at [www.swgdog.org](http://www.swgdog.org).

Are training schools going to initially certify detection teams? At one time, I believe it was discussed each company will do their own certification and document it through video taping. I appreciate that you advised in our meeting today, that DCJS will accept certification standards that meet or exceed their recommended standards? Video taping however, is not practical. Many of our clients test us annually and many of our company certifications take place on federal property. Video taping is strictly prohibited at these sites. Requiring video taping will prevent acceptance of certifications conducted by outside entities such as our clients. Requiring this will cause companies to incur much more cost because they will have to work around regular work schedules, bring people in on their day off, and find additional places to try and conduct their certification. Video

taping will not prevent anyone from cheating if that's what they choose to do. There really is no benefit for this type of requirement.

Paragraph C.

Any handler that meets the requirements to be an examiner, and has completed and has documentation to verify a supervisory course such as the Military Working Dog Supervisor/Trainers course should receive exemption to everything except code and regulations. This course of instruction has trained them to manage their kennels and provide all aspects of canine support to the installation they are assigned. This includes patrol, explosive and narcotic detection duties. There should be no exam for anyone who has a certificate of training from this course or any similar course. When completing these courses of instruction they are tested. I see no provisions to test individuals who will be developing and administering these tests. We do not test other categories when they receive training elsewhere. For example, someone attending a firearms instructor course from another organization can apply to become a DCJS certified instructor without examination. They only need to submit range scores which is a practical evaluation.

The apprenticeship program recommended is 120 hours long. When supervising a handler in this program the supervisor only needs to be a certified detection handler. What if the handler supervising the training also just completed the apprenticeship program and has very little experience? There are requirements to be an examiner and I would recommend having requirements for this as well. I recommend that the position of supervisor only be granted to handlers who have three years experience with an additional two years as a trainer, thus giving you a total of five years experience while supervising novice handlers in this program. This ensures someone with experience will be capable of correcting any deficiency's the handler or canine may have.

The apprenticeship program further states, "those individuals previously certified may take the certification exam without completing the apprenticeship program." As we discussed today, exemption should be granted to those who submit documentation which meets or exceeds the recommended minimum standard, with the exception of code and regulations. No certification exam should be required for those being granted exemption. The language used, "those individuals previously certified may take the certification exam without completing the apprenticeship program" should be stricken.

All of my comments and recommendations are made to offer the benefit of industry experience to best protect the public. Nothing I have recommended will in any way offer favoritism to any private company. I ask you to please consider my recommendations. If you have any questions or concerns with any recommendation or comment please don't hesitate to contact me. I may be able to clear up any confusion if you contact me with questions or concerns.

The Department met with an ad-hoc committee made up of members from the detector canine community as well as met with Mr. White in regard to the Detector Canine program. Mr. White's concerns and recommendations have been addressed in the regulatory language.

<p>John K &amp; Susan DellaPenta, Certified Training Academy, VBFAA</p>	<p>* Strongly believes that 6 VAC 20-171-350 Entry-level Training, et seq. be amended to permit DCJS Certified Training Schools to provide entry-level compliance agent training.</p> <p>Comment: Suggested to assist DCJS with increasing responsibilities without the ability to hire necessary staff.</p> <p>Convenience to members of the industry, to encourage growth of the industry with greater accessibility.</p> <p>DCJS would get the same revenue by charging for the examination (students get their training, but do online testing controlled by DCJS).</p> <p>DCJS controls the curriculum.</p> <p><u>While the Department appreciates the offered assistance, this training is provided by the Department who has the regulatory authority over the Private Security Services Programs. The compliance agent is the individual responsible for maintaining compliance and the Department is able to address specific issues of concern and insure that the compliance agent receives the proper training and understands the expectations of the regulating authority.</u></p>
<p>John K &amp; Susan DellaPenta, Certified Training Academy, VBFAA</p>	<p>* Suggests to amend 6 VAC 20-171-350 Entry-level Training to read: “Add the curriculum for DCJS certified training schools to train general instructors like any other DCJS course, to include session notification and roster submittal. This will eliminate the large amounts of paperwork that applicant must submit and DCJS must review and file in the waiver process”.</p> <p><u>This section is geared towards the compulsory minimum training standards for registered personnel. The Department provides General Instructor training. Schools have the opportunity to submit general instructor training for review for possible waivers for instructors. Should a school provide the Department with the applicable paperwork for qualification as an approved DCJS course, the applicant would not be required to submit as much paperwork.</u></p>
<p>Martha Clancy</p>	<p>* Asks that 6 VAC 20-171-350. Entry-level Training be reviewed very carefully.</p> <p>Comments: This entire section must be carefully reviewed with specific attention to the individual course content, especially for PPS, Alarm Respondent, and Detector Canine Handlers,</p> <p>as well as in general - the means of delivery of instruction – e.g. computer-based training, identification of students, testing, and practical exercises.</p> <p><u>Training has been inserted for the Detector Canine handlers. The Department is not recommending any further amendments to the course content for the other courses at this time. The Department is looking into implementing standardized testing in the future and upon the completion of the research will be able to better address what training amendments are needed in order to meet the requirements of the standardized testing. The Department will reopen the regulations for amendment once this initiative has been developed further.</u></p>
<p>Bill Scouten VIP Security School ***** Travis Palmer</p>	<p>* Suggests that 6 VAC 20-171-350. B should read: “Training will be credited only if application for registration or certification is received by the department within 12 months of completion of training”.</p> <p><u>The Department agrees. The language has been amended.</u></p>

Travis Palmer	<p>* 6 VAC 20-171-350D(3) - Armored car personnel</p> <p><u>No response needed. No change recommended.</u></p>	
Travis Palmer	<p>6VAC20-171-350D (3e)</p> <p>Entry level training (refer to Article 2 (6VAC20-171 et seq.) of this part)</p> <p>-14 hours (includes 4 hours of range dry fire and low level lighting)</p> <p>4 hours of range dry fire is rather extreme. "and low level lighting" what? This needs to be clarified.</p> <p><u>The Department met with the Private Security Services Advisory Board Training Committee on numerous occasions in regard to revamping the firearms training.. Mr. Palmer was present at the meetings and presented his ideas/recommendations. The firearms entry-level handgun training was amended which address Mr. Palmer's comments.</u></p>	
Chuck Tobin AT-RISK	<p>* Recommends that 6 VAC 20-171-350.D (6) be changed to amend the training hours as follows:</p> <p>Administration and personal protection orientation -- 4 hours</p> <p>b. Applicable sections of the Code of Virginia and DCJS regulations -- 1 hour</p> <p>c. Assessment of threat and protect vulnerability -- 10 hours</p> <p>d. Legal authority and civil law -- 3 hours</p> <p>e. Protective detail operations -- 30 hours</p> <p>f. Emergency procedures -- 12 hours</p> <p>(1) CPR</p> <p>(2) Emergency first aid</p> <p>(3) Defensive preparedness</p> <p>g. Performance evaluation -- Five practical exercises</p> <p>h. Written examination</p> <p>Total hours (excluding written examination and performance evaluation) -- 60 hours</p> <p><u>The Department has removed the breakdown of individual training hours for each training objective to allow for schools to have flexibility in establishing their lesson plans. Schools will still have the requirement of submitting the hours of training of each objective for approval by the Department.</u></p>	
<b>6VAC20-171-360</b>	<b>In-Service Training</b>	
John K & Susan DellaPenta, Certified Training Academy, VBFAA	<p>* Asks that the Department does not amend 6 VAC 20-171-360 (A) In-service Training</p> <p>Comment: Applicant should be able to go to training at their convenience.</p> <p><u>The Department did not make any amendments to the in-service training requirements, specifically any change in the time requirement of 24 months.</u></p>	



<p>PISA</p>	<p>* Suggests to amend 6 VAC 20-171-360. In-service Training.</p> <p>... “shall complete compulsory in-service training standard once during each 24-month period of registration or certification.” Registrants should be able to determine when to take in-service training that will benefit their professional development any time during the 24-month period of registration.</p> <p><u>The Department agrees and did not recommend any change.</u></p> <p>C.11. General Instructors.</p> <p>Amend to a. Regulations review and legal issues, and</p> <p>b. Related topics.</p> <p>Article 2. Firearms Training Requirements.</p> <p>This entire article requires careful review with specific attention to “Dim low-level light shooting familiarization”, liability considerations for Instructors and Training Schools, and statement of inclusion of 07R within 09R.</p> <p><u>The Department met with the Private Security Services Advisory Board Training committee and members of the industry in regard to amendments to the firearms training requirements. The amendments should address the concerns/recommendations of PISA.</u></p>
<p>Bill Scouten VIP Security School</p>	<p>* Asks for clarification of 6 VAC 20-171-360. A:</p> <p>Line 5 says “once during each 24 month period of registration or certification”. Is this a true or should it be “within 12 months of expiration.</p> <p><u>This is correct. In-service training is required during each 24 month period of registration.</u></p>
<p>Bill Scouten VIP Security School</p>	<p>* Asks for clarification of 6 VAC 20-171-360.A. (1b)...Why 30 days and \$25 when the “norm” is 60 days and \$10?</p> <p><u>This language has been stricken.</u></p>

<p>Landon T. White, Explosive Countermeasures International Incorporated</p>	<p>6VAC 20-172-360. Detector Handler In-service Training and Performance Evaluation.</p> <p>Each detector canine handler shall comply annually with the requirement for an annual in-service training and performance evaluation.</p> <p>Pertinent sections of the Code of Virginia and CJSB Regulations Relating to the Private Security Services - 1 hour</p> <p>2. Job-related training.</p> <p>a. Explosive/Narcotic Safety-1 hour</p> <p>b. Terrorist/Criminal Intelligence Update - 2hours</p> <p>Total Job Related Training - 4 hours</p> <p>No written exam for in-service training - other registered categories do not test such as, armed and unarmed security. Armed basically has a performance evaluation they must pass on the range.</p> <p>Practical Exercises / Performance Evaluation - 4 hours</p> <p>Total - 8 hours</p> <p><u>The Department established an ad hoc committee to establish the compulsory minimum training standards for detector canine handlers. The Department also met with members of the detector canine industry to include Mr. White. The detector canine minimum training standards inserted in the Regulations include recommendations from Mr. White.</u></p>
<p><b>6VAC20-170-370</b></p>	<p><b>Entry-level handgun training</b></p>
<p>Private Security Services Advisory Board – SubCommittee on Training (PSSAB)</p>	<p>6 VAC 20-171-370. Entry level handgun training.</p> <p>A. Handgun classroom training.</p> <p>Amend the minimum compulsory training standards and increase entry-level firearms training to 36 hours.</p> <p><u>The Department met with the Private Security Services Advisory Board Training Committee on numerous occasions in regard to revamping the firearms training. The original recommendation of increasing firearms training from 14 to 36 hours was agreed to be excessive. Upon further meetings/discussion with the committee and members of the industry, the Department is recommending amendments to the curriculum and instituting a firearm training curriculum and range specific to armed security officers with the minimum hour requirement of 24 hours.</u></p>
<p>Travis Palmer</p>	<p>*Suggests that 6 VAC 20-171-370.B (1) Add the following verbiage: “Equipment needed: handgun, belt with directional draw holster, ammunition (minimum 60 rounds), 2 speed loaders, and/or 3 magazines.”</p> <p><u>The Department met with the Private Security Services Advisory Board Training Committee on numerous occasions in regard to revamping the firearms training.. Mr. Palmer was present at the meetings and presented his ideas/recommendations. The firearms entry-level handgun training was amended, which address Mr. Palmer’s comments.</u></p>

<p>Private Security Services Advisory Board – SubCommittee on Training (PSSAB)</p>	<p>6 VAC 20-171-370. Entry level handgun training.</p> <p>Amend the Entry-level handgun training range course of fire.</p> <p><u>The Department met with the Private Security Services Advisory Board Training Committee on numerous occasions in regard to revamping the firearms training.</u></p> <p><u>Upon further meetings/discussion with the committee and members of the industry. The Department is incorporating the recommended amendments to the entry-level firearms course of fire.</u></p>
<p>Travis Palmer</p>	<p>*Suggests that 6 VAC 20-171-370.B (6) be changed to state... “on the range directly controlling the firing line during all phases...”</p> <p>*Suggests that 6 VAC 20-171-370.B (9) be changed to: “The low light range qualification shall be scored as indicated above, i.e., B.8. The final range qualification will be the average of both range qualifications, i.e., regular qualification = 92%, low level light qualification = 88% (92% + 88% = 180/2 = 90%)”.</p> <p>*Suggests that 6 VAC 20-171-370.C.(3b) be changed to: “Barricaded position may be used. On command, assume the kneeling position, draw and fire 6 rounds with strong hand.”</p> <p>*Suggests that 6 VAC 20-171-370.C.(3d) delete (kneeling position may be fired using barricade position.)</p> <p>*Suggests that 6 VAC 20-171-370.D (1e) add “with weak hand.”</p> <p><u>The Department met with the Private Security Services Advisory Board Training Committee on numerous occasions in regard to revamping the firearms training. Mr. Palmer was present at the meetings and presented his ideas/recommendations. The firearms entry-level handgun training and course of fire was amended, which address Mr. Palmer’s comments.</u></p>
<p>Bill Scouten VIP Security School</p>	<p>*Suggests that 6 VAC 20-171-370.D Equipment, should read “one speed loader or two magazines.”</p> <p><u>The Department met with the Private Security Services Advisory Board Training Committee on numerous occasions in regard to revamping the firearms training.</u></p> <p><u>Upon further meetings/discussion with the committee and members of the industry, the Department is incorporating the recommended amendments to the entry-level firearms course of fire.</u></p>
<p><b>6VAC20-171-380</b></p>	
<p>Travis Palmer</p>	<p>*Suggests that 6 VAC 20-171-380.A (6) Delete “and proper use of sling.”</p> <p>*Suggests that 6 VAC 20-171-380.B1 be changed to “Five rounds” to “5 rounds” consistency of: alphabetic –vs.- numeric.</p> <p><u>The Department met with the Private Security Services Advisory Board Training Committee on numerous occasions in regard to revamping the firearms training.. Mr. Palmer was present at the meetings and presented his ideas/recommendations. The firearms entry-level shotgun training was amended, which address Mr. Palmer’s comments.</u></p>

<p>PSSAB Training SubCommittee</p>	<p>6 VAC 20-171-380. Entry level shotgun training.</p> <p>A. Shotgun classroom training. The entry level shotgun classroom instruction will emphasize but not be limited to:</p> <p>Amend the minimum compulsory training standards and increase entry-level shotgun firearms training 4 hours.</p> <p><u>The Department met with the Private Security Services Advisory Board Training Committee on numerous occasions in regard to revamping the firearms training.</u></p> <p><u>Upon further meetings/discussion with the committee and members of the industry, the Department is including the recommended amendments to the curriculum and shotgun course of fire.</u></p>	
<p>6VAC20-171-390</p>	<p><b>Advanced handgun training</b></p>	
<p>Travis Palmer</p>	<p>*Suggests utilizing numeric numbers for consistency.</p> <p>Comments: Being consistent through out, i.e.</p> <p>C1: Stage One or Stage 1</p> <p>C2 Stage Two or Stage 2 etc.</p> <p>Seven yard line to 7. etc.</p> <p>Change: (straight draw hip holster only) to (directional draw holster only). Consistent with 6VAC20-171-370.</p> <p><u>The Department included amendments into the new language of the Advanced handgun training</u></p>	
<p>Chuck Tobin AT-RISK</p>	<p>* Suggests that 6 VAC 20-171-390.A be amended to include:</p> <p>A. Advanced handgun classroom training.</p> <p>1.The advanced handgun training will include but not be limited to:</p> <ul style="list-style-type: none"> <li>a. Review of firearms safety</li> <li>b. Review civil and criminal liability</li> <li>c. Concealed carry law and authority;</li> <li>d. Function of firearms in close protection operations;</li> <li>e. Deployment of firearms in close protection operations;</li> <li>f. Use of force;</li> <li>g. Advanced marksmanship; and</li> <li>h. Decision-making for the personal protection specialist.</li> </ul> <p>Range Training – Practical range exercises – 4 hours</p> <p>Total hours (excluding written examination)--14 hours</p> <p>Comment: The Advanced Handgun course of fire duplicated the training requirements of the entry level security officer class which is a pre-requisite. It makes sense to review the</p>	

	<p>legal topics for students and expand the student’s legal understanding of concealed carry laws and the change in requirements for the use of force. As a result, less time is required for the students training in order to receive their entry level handgun and advanced handgun program, without reducing the quality of training, merely, reducing repetition. Many other topics relative to the use of force, deadly force, etc. are addressed for the student in entry-level training. This program, as its title indicates, is advanced training and should be built upon foundation that the student has completed basic training. Since this program is directed as those persons carrying concealed for protective details, then the training should spend time explaining the appropriate deployment of a firearm in protective detail operations. It is also proposed that these types of programs should require the student to spend a minimum amount of time on a range, rehearsing the skill sets and preparing for qualification on the course of fire.</p> <p><i>The Department agrees and has made the appropriate amendments to the language.</i></p>
<p><b>6VAC20-171-450</b></p>	
<p>Martha Clancy</p>	<p>* Recommends that 6 VAC 20-171-450. Entry-level training exemptions be expanded to include the actual exemptions by category and hours.</p> <p><i>The exemptions are based on third party documentation and the training must meet and exceed the compulsory minimum training standards. Each exemption proves to be individualized in how much training may be waived.</i></p>
<p><b>6VAC20-171-460</b></p>	
<p>John K &amp; Susan DellaPenta, Certified Training Academy, VBFAA</p>	<p>* Consider amending: 6 VAC 20-171-460 (A) In-service Training Exemption.</p> <p>Comments: Change the period of the waiver is good for to be 24-months apropos to the consistency with 6 VAC 20-171-360 (A).</p> <p><i>The language has been amended.</i></p>
<p><b>6VAC20-171-470</b></p>	
<p>Landon T. White, Explosive Countermeasure s International Incorporated</p>	<p>6 VAC 20-172-470. Entry-level Training.</p> <p>Mr. White submitted a course and hour requirement for Detector Canine Handlers</p> <p>Total Hours (excluding examinations) 50 hours classroom</p> <p>PRACTICAL EXERCISES (OJT) 150 hours</p> <p>Total Program Hours 200 hours</p> <p><i>The Department established an ad hoc committee to establish the compulsory minimum training standards for detector canine handlers. Further, the Department also met with Mr. White and members of the detector canine industry for further discussions. The detector canine minimum training standards inserted in the Regulations include recommendations from Mr. White.</i></p>
<p><b>6VAC20-171-500</b></p>	
<p>Bill Scouten VIP Security School</p>	<p>* Asks for clarification with 6 VAC 20-171-500.A read (Line 2): “regardless of criminal prosecution” while the Code of Virginia 9.1-150 line two reads, “who is not criminally prosecuted”...is the regulation in conflict with the Code?</p> <p><i>The regulation language “regardless of criminal prosecution” is if there is a conviction that also is a violation of the Code and Regulations Relating to Private Security Services.</i></p>

	<p><u>The Code §9.150 allows the Department to sanction for violations if the Department chooses not to pursue further criminal prosecution in regard to §9.1-149 C</u></p>
<p>Bill Scouten VIP Security School</p>	<p>* Asks for clarification with 6 VAC 20-171-500.A: Code says, “any person licensed, certified or registered by the Board”, while one of the regulations says, “each person subject to jurisdiction of this chapter”.</p> <p>If a person is violating the regulations/code governing Private Security but is not currently licensed, certified, or registered – can they be sanctioned by the Board?</p> <p><u>The Department can sanction individuals who are licensed, certified or registered according to the Code. If not licensed/certified/registered the Department will issue a cease and desist order or forward for criminal prosecution. The Department has implemented a section within the Reinstatement section of the Regulations that allows the Department disciplinary authority during the period of reinstatement. See 6VAC20-171-180 for new language.</u></p>
<p>Martha Clancy PISA</p>	<p>* Suggests that 6 VAC 20-171-500.B(7) Remedial Training, require an individual to provide the Training School with documentation from the Department imposing remedial training (as is done with Partial Exemptions to Training).</p> <p><u>The Department does not agree that this information should be automatically shared with a 3<sup>rd</sup> party. Remedial training is in response to a violation or noncompliance of the Code or Regulations. This information may be shared by the respondent. All department investigations are public record and may be requested under the Freedom of Information Act.</u></p>

**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.*

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

**Detail of changes**

*Please detail all changes that are being proposed and the consequences of the proposed changes. If the proposed regulation is a new chapter, describe the intent of the language and the expected impact if implemented in each section. Please detail the difference between the requirements of the new provisions and the current practice or if applicable, the requirements of other existing regulations in place.*

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

For changes to existing regulations, use this chart:

Current section number	Proposed new section number, if applicable	Current requirement	Proposed change, rationale, and consequences
6 VAC 20-171-10		Definitions	<b>Amend</b> the term “Assistant training director” insert the word school after the word training.
6 VAC 20-171-10		Definitions	<b>Amend</b> the definition for Certification, delete the word a after the word means and insert the. Insert <u>certified detector canine handler examiners</u> at the end of the sentence pursuant to §9.1-138.
6 VAC 20-171-10		Definitions	<b>Insert</b> the definition for “Classroom training” means <u>instruction conducted by an instructor in person to students in an organized manner utilizing a lesson plan.</u> This definition is needed to establish the difference between classroom and on-line training.
6 VAC 20-171-10		Definitions	<b>Delete</b> the term “Combat loading” – this term is not necessary to have defined in the regulations..
6 VAC 20-171-10		Definitions	Pursuant to §9.1-138 - <b>Insert</b> the definitions for “ <u>Detector canine</u> ” means any dog that detects drugs or explosives. “ <u>Detector canine handler</u> ” means any individual who uses a detector canine in the performance of private security services. “ <u>Detector canine handler examiner</u> ” means any individual who examines the proficiency and reliability of detector canines and detector canine handlers in the detection of drugs or explosives. “ <u>Detector canine team</u> ” means the detector canine handler and his detector canine performing private security duties.
6 VAC 20-171-10		Definitions	<b>Delete</b> the definition for Electronic roster submittal. The Department is moving towards the implementation of a web-based licensing system as well as inserting additional

			requirements of reporting on the individual applicants. This new process will remove the need to charge an additional fee to the schools since the reporting of training will be shared.
6 VAC 20-171-10		Definitions	Insert the definition for <u>“Electronic images” means an acceptable method of maintaining required documentation through the scanning, storage and maintenance of verifiable electronic copies of original documentation.</u>
6 VAC 20-171-10		Definitions	<b>Insert</b> the definition for <u>“Entry-level training” means the compulsory initial training for registered categories and basic or intermediate firearms training standards adopted by the Board for private security services business personnel who are either new registrants or failed to timely complete in-service within the prescribed time period.</u>
6 VAC 20-171-10		Definitions	<b>Amend</b> the definition of "Firearms training verification" means verification of successful completion of <del>either</del> initial or retraining requirements for handgun, <del>or</del> shotgun <u>or patrol rifle training, or both.</u>
6 VAC 20-171-10		Definitions	Amend the definition for "Firm" means a business entity, regardless of method of organization, applying for <u>a an initial or renewal private security services business license or for the renewal or reinstatement of same private security services training school certification.</u>
6 VAC 20-171-10		Definitions	Inset the definition for <u>“Intermediate weapon” means a tool not fundamentally designed to cause deadly force with conventional use. This would exclude all metal ammunition firearms and/or edged weapons. These weapons include but are not limited to: baton/collapsible baton; chemical irritants; electronic restraining devices; projectiles and other less-lethal weapons as defined by the department.</u>
6 VAC 20-171-10		Definitions	Insert the definition for <u>“Job-related training” means training specifically related to the daily job functions of a given category of registration or certification as defined in this chapter. Certifiable job-related training may include a maximum of 1 hour of instruction dedicated to the review of regulations.</u>
6 VAC 20-171-10		Definitions	<b>Insert</b> definition for <u>“key cutting” means making duplicate keys from an existing key and includes no other locksmith services pursuant to §9.1-138.</u>
6 VAC 20-171-10		Definitions	<b>Insert</b> definition for <u>“locksmith” means any individual that performs locksmith services, or advertises or represents to the general public that the individual is a locksmith even if the specific term locksmith is substituted with any other term by which a reasonable person could construe that the individual possesses special skills relating to locks or locking devices, including use of the words lock technician, lockman, safe technician, safeman, boxman, unlocking technician, lock installer, lock opener, physical security technician or similar descriptions. pursuant to §9.1-138.</u>



6 VAC 20-171-10		Definitions	<b>Delete</b> the definition for Locksmith security equipment
6 VAC 20-171-10		Definitions	<b>Insert</b> definition <u>“locksmith services” mean selling, servicing rebuilding, repairing, rekeying, repinning, changing the combination to an electronic or mechanical locking device; programming either keys to a device or the device to accept electronic controlled keys; originating keys for locks or copying keys; adjusting or installing locks or deadbolts, mechanical or electronic locking devices, egress control devices, safes, and vaults; opening, defeating or bypassing locks or latching mechanisms in a manner other than intended by the manufacturer; with or without compensation for the general public or on property not his own nor under his own or authority. pursuant to 9.1-138</u>
6 VAC 20-171-10		Definitions	Insert definition <u>“Network administrator” means an individual designated by a certified training school that provides online training who serves as the technical contact between the department and the certified training school.</u>
6 VAC 20-171-10		Definitions	Insert definition <u>“On-line training” means training approved by the department and offered via the internet or an intranet for the purpose of remote access on-demand or long distance training that meets all requirements for compulsory minimum training standards.</u>
6 VAC 20-171-10		Definitions	Amend the definition of “Private security services business” to include the business category of locksmiths and canine categories. "Private security services business" means any person engaged in the business of providing, or who undertakes to provide, armored car personnel, security officers, personal protection specialists, private investigators, couriers, security canine handlers, <u>security canine teams, detector canine handlers, detector canine teams</u> , alarm respondents, <u>locksmiths</u> , central station dispatchers, electronic security employees, electronic security sales representatives or electronic security technicians and their assistants to another person under contract, express or implied.
6 VAC 20-171-10		Definitions	Amend the definition of “Private security services business personnel” to include the registration category of locksmith and detector canine handler.
6 VAC 20-171-10		Definitions	Amend the definition of “Private security services registrant” to include the registration category of locksmith and detector canine handler. Insert <b>locksmith</b> after the words alarm respondents and <b>detector canine handler</b> after the words security canine handler pursuant to §9.1-138
6 VAC 20-171-10		Definitions	Amend the definition of “Registration category” to include the category of <u>detector canine handler</u> and <u>locksmith</u> pursuant to §9.1-138. "Registration category" means any one of the following categories: (i) unarmed security officer and armed security officer/courier, (ii) security canine handler, (iii) armored car personnel, (iv) private investigator, (v) personal protection specialist, (vi) alarm respondent, (vii) central station dispatcher, (viii)

			electronic security sales representative, <del>or</del> (ix) electronic security technician, <del>or</del> (x) electronic security technician's assistant, (xi) detector canine handler or (xii) locksmith.
6 VAC 20-171-10		Definitions	Insert the definition " <u>Related field</u> " means any field with training requirements, job duties, and experience similar to those of the private security services field the applicant wishes to be licensed, certified, or registered in. This includes, but is not limited to law enforcement and certain categories of the military.
6 VAC 20-171-10		Definitions	Amend the definition of "Session" to include the the other regulatory programs.  "Session" means a group of classes comprising the total hours of mandated <u>compulsory minimum</u> training standards in any of the following categories: <del>unarmed security officer, armed security officer/courier, personal protection specialist, armored car personnel, security canine handler, private investigator, alarm respondent, locksmith, central station dispatcher, electronic security sales representative, electronic security technician, electronic security technician's assistant or compliance agent of licensure, registration, or certification in accordance with this article and in accordance with §§ 9.1-150.2, 9.1-185.2 and 9.1-186.2 of the Code of Virginia.</del>

**Part II - Application Fees**

6VAC20-171-20.		Fees	<b>Amend</b> the fee structure to include an option for businesses to obtain a one year or two year initial license, an increase in the firearms endorsement fee, an additional category fee for training schools and instructors and a separation of certification application fees and required regulatory compliance training fees. The electronic roster submittal fee has been deleted and instructor training development fees have been removed from the regulation. There is also a new manual processing service fee for applications not submitted by available electronic methods. Other amendments involve a restructuring of the fee schedule for clarity.
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CATEGORIES	FEEES
<u>CRIMINAL HISTORY RECORDS CHECK</u>	
<u>Fingerprint Processing Application</u>	<u>\$50.00</u>
<u>LICENSE</u>	
Initial business license	<u>\$800</u>
<u>1 Year License</u>	<u>\$550</u>
<u>2 Year License</u>	<u>\$800</u>
Business license renewal ( <u>2 Year License</u> )	<u>\$500</u>
Business license category fee	<u>\$50</u>
<u>CERTIFICATIONS</u>	-
Initial compliance agent certification ( <del>includes training</del> )	<u>\$100</u> <u>\$50</u>
Compliance agent certification renewal ( <del>includes training</del> )	<u>\$50</u> <u>\$25</u>
- Initial registration	<u>\$25</u>
- Registration renewal	<u>\$20</u>

-	<del>Firearms endorsement (annual)</del>	\$10
	Initial training school	\$800
	Training school renewal	\$500
	<u>Training school category fee</u>	\$50
	<del>Training school electronic roster submittal authorization</del>	\$500
	Initial instructor certification	<del>\$100</del> \$50
	Instructor certification renewal	<del>\$50</del> \$25
	<u>Instructor certification category fee</u>	\$10
	<u>Initial Detector Canine Handler Examiner certification</u>	\$50
	<u>Detector Canine Handler Examiner Certification renewal</u>	\$25
	<del>Initial certification</del>	\$25
	<del>Certification renewal</del>	\$20
	<u>REGISTRATION</u>	
	<u>Initial registration</u>	\$25
	<u>Registration renewal</u>	\$20
	<u>Additional registration category form</u>	\$20
	<u>Replacement photo identification</u>	\$20
	<u>TRAINING RELATED</u>	
	<u>Firearm Endorsement</u>	\$15
	<del>Application for Entry Level partial -training exemption</del>	\$25
	<u>In Service Training Alternative Credit Evaluation</u>	\$25
	<u>Regulatory Compliance entry-level training</u>	\$75
	<u>Regulatory Compliance In-service training</u>	\$50
-	<del>Fingerprint card processing</del>	\$50
-	<del>Additional registration category form</del>	\$20
-	<del>Replacement photo identification letter</del>	\$15
	Training completion roster form	\$30
	<del>General instructor development course</del>	\$300
	<del>General instructor in service training</del>	\$50
	<del>Firearms instructor development course</del>	\$300
	<del>Firearms instructor in service training</del>	\$50
	<del>Technical assistant training</del>	\$50

6VAC20-171-20B1		Fees	<b>Insert</b> language for clarity – referring constituents to reinstatement provision. B. Reinstatement fee. 1. The department shall collect a reinstatement fee for registration, license, or certification renewal applications not received on or before the expiration date of the expiring registration, license, or certification <u>pursuant to 6VAC 20-171-180.</u>
6VAC20-171-20C		Fees	<b>Amend</b> for grammar. C. Dishonor of fee payment due to <del>non</del> <u>insufficient</u> funds.
6VAC20-171-20C1		Fees	<b>Strike</b> unneeded language: 1. The department may suspend the registration, license, certification, or authority it has granted any person, <del>licensee or registrant</del> who submits a check or similar instrument for payment of a fee required by statute or regulation which is not honored by the financial institution upon which the check or similar instrument is drawn.

6VAC20-171-20C2		Fees	<p><b>Delete</b> accompany and insert accompanies:                  2. The suspension shall become effective upon receipt of written notice of the dishonored payment. Upon notification of the suspension, the person, registrant or licensee may request that the suspended registration, license, certification, or authority be reinstated, provided payment of the dishonored amount plus any penalties or fees required under the statute or regulation <del>accompany</del> <u>accompanies</u> the request. Suspension under this provision shall be exempt from the Administrative Process Act.</p>
6VAC20-171-20D1		Fees	<p><b>Insert</b> subsection in order to provide an explanation of the manual processing service fee. The Department is moving towards a web-based licensing system and the including a fee will reduce the excessive amounts of paperwork when the system will allow for electronic submittal. This will enable to department to provide more efficient and effective service to the industry.</p> <p><u>D. Manual processing service fee.</u>                  1. <u>The department shall collect a \$5.00 service fee for any applications under this chapter that are submitted to the department by other means than the available electronic methods established by the department.</u></p>
6VAC20-171-30A		Fingerprint processing.	<p><b>Insert</b> <u>detector canine handler examiner certification</u> pursuant to 9.1-138 et seq. and <b>strike</b> the language “or private security certificate” in the last sentence for grammatical purpose.</p> <p>A. On or before the first date of hire, each person applying for licensure as a private security services business, including principals, supervisors, and electronic security employees; certification as a private security services training school; certification as a compliance agent, <u>detector canine handler examiner</u> or instructor; or a private security registration <del>or private security certification</del> shall submit to the department:</p>
6VAC20-171-30A1		Fingerprint processing.	<p><b>Amend</b> to reflect current process. The Department moved to a scanning process in which only one card is scanned and then electronically submitted to the state police and the FBI.</p> <p>1. <del>Two</del> <u>One</u> completed fingerprint <del>cards</del> <u>card</u> provided by the department or another electronic method approved by the department;</p>
6VAC20-171-30C		Fingerprint processing.	<p><b>Amend</b> paragraph to reflect the current process.</p> <p>C. Fingerprints cards found to be unclassifiable will be <del>returned to the applicant. Action on the application will be suspended</del> <u>suspend all action on the application pending the resubmittal</u> <u>resubmission of a classifiable fingerprint cards</u> <u>card</u>. The applicant shall be so notified in writing and <del>shall</del> <u>must</u> submit a new fingerprint <del>cards</del> <u>card</u> and the <del>applicable, nonrefundable fee to the department</del> <u>within 30</u></p>

			<p><del>days of notification</del> before the processing of his application shall resume. <del>However, no such fee may be required if the rejected fingerprint cards are included and attached to the new fingerprint cards when resubmitted and the department is not assessed additional processing fees.</del> <u>If a fingerprint card is not submitted within the 30 days, the initial fingerprint application process will be required to include applicable application fees.</u></p>
6VAC20-171-30E		Fingerprint processing.	<p><b>Insert</b> paragraph to reflect current policy within the department. Criminal history checks are a point in time review. Applicants are required to submit for a criminal history check and some categories of registration have up until 120 days to complete the registration process. <u>E. Fingerprint applications will only be active for 120 days from the date of submittal. Application for licenses, registrations and certifications must be submitted within that 120 day period or initial fingerprint submittal will be required.</u></p>
6VAC20-171-50B1		Initial business license application.	<p><b>Insert</b> fingerprint requirement for electronic security services employee pursuant to §9.1-145. B. 1. For each principal and supervisor of the applying business, their fingerprints pursuant to 6VAC20-171-30; <u>for each electronic security employee of an electronic security services business, their fingerprints pursuant to 6VAC20-171-30;</u></p>
6VAC20-171-50B2		Initial business license application.	<p><b>Amend</b> to clarify insurance requirements. 2. Documentation verifying that the applicant has secured a surety bond in the amount of \$100,000 executed by a surety company authorized to do business in Virginia, or a certificate of insurance reflecting the department as a certificate holder, showing a policy of comprehensive general liability insurance with a minimum coverage of \$100,000 <u>per individual occurrence</u> and \$300,000 <u>general aggregate</u> issued by an insurance company authorized to do business in Virginia;</p>
6VAC20-171-50B4		Initial business license application.	<p><b>Amend</b> to allow for the department to implement electronic application submittal. 4. For each applicant for a license as a private security services business except sole proprietor or partnership, <del>on a form provided by the department</del> the identification number issued by the Virginia State Corporation Commission for verification that the entity is authorized to conduct business in the Commonwealth;</p>
6VAC20-171-50B5		Initial business license application.	<p><b>Strike</b> paragraph. Evolving technology and paperless documentation systems render this requirement obsolete and eliminates an unnecessary hardship for out of state licensees. <del>5. A physical address in Virginia where records required to be maintained by the Code of Virginia and this chapter are kept and available for inspection by the department. A</del></p>

			<del>post office box is not a physical address;</del>
6VAC20-171-50B6	B5	Initial business license application.	<b>Renumber</b> subsection <del>65</del> . On the license application, designation of at least one individual as compliance agent who is not designated as compliance agent for any other licensee, and who is certified or eligible for certification pursuant to 6VAC20-171-70;
6VAC20-171-50B7	B6	Initial business license application.	<b>Renumber</b> subsection <del>76</del> . The applicable, nonrefundable license application fee; and
6VAC20-171-50B8	B7	Initial business license application.	<b>Renumber</b> subsection, <b>amend</b> language for clarity and <b>insert</b> business categories of private security services pursuant to §9.1-138 <del>87</del> . Designation on the license application of the type of private security business license the applicant is seeking. The initial business license fee includes one category. A separate fee will be charged for each additional category. The separate categories are identified as follows: security officers/couriers (armed and unarmed), private investigators, electronic security <u>personnel</u> , armored car <u>personnel</u> , personal protection specialists, <u>locksmiths</u> , <u>detector canine handlers</u> and security canine handlers. Alarm respondents crossover into both the security officer and electronic security category; therefore, if an applicant is licensed in either of these categories, he can provide these services without <del>purchasing</del> an additional category <u>fee</u> .
6VAC20-171-50E		Initial business license application.	<b>Insert</b> specific descriptions of what changes would constitute a new legal entity. The department receives numerous inquiries that reflect the need to provide specificity in the regulations.  E. A new license is required whenever there is any change in the ownership or type of organization of the licensed entity that results in the creation of a new legal entity. <u>Such changes include but are not limited to:</u> <u>1. Death of a sole proprietor;</u> <u>2. Death or withdrawal of a general partner in a general partnership or the managing partner in a limited partnership; and</u> <u>3. Formation or dissolution of a corporation, a limited liability company, or an association or any other business entity recognized under the laws of the Commonwealth of Virginia.</u>
6VAC20-171-50F		Initial business license application.	<b>Strike</b> exception. This exception did not provide for consistency for all licensees.  F. Each license shall be issued to the legal business entity named on the application, whether it <del>be</del> <u>is</u> a sole proprietorship, partnership, corporation, or other legal entity, and shall be valid only for the legal entity named on

			<p>the license. No license shall be assigned or otherwise transferred to another legal entity, <del>with the exception of a sole proprietorship or partnership that incorporates to form a new corporate entity where the initial licensee remains as a principal in the newly formed corporation. This exception shall not apply to any existing corporation that purchases the business or assets of an existing sole proprietorship.</del></p>
6VAC20-171-60C2		Renewal license application.	<p><b>Amend</b> to clarify insurance requirements.                  2. Documentation verifying that the applicant has secured a surety bond in the amount of \$100,000 executed by a surety company authorized to do business in Virginia, or a certificate of insurance reflecting the department as a certificate holder, showing a policy of comprehensive general liability insurance with a minimum coverage of \$100,000 <u>per individual occurrence</u> and \$300,000 <u>general aggregate</u> issued by an insurance company authorized to do business in Virginia;</p>
6VAC20-171-60C5		Renewal license application.	<p><b>Insert</b> language for clarity of fee requirements                  C. 5. The applicable, nonrefundable license renewal fee <u>and applicable category of service fees</u>; <del>and</del></p>
6VAC20-171-60C6		Renewal license application.	<p>Insert the word and                  6. On the first day of employment, each new and additional supervisor's fingerprints submitted to the department pursuant to § <u>9.1-139</u> H of the Code of Virginia- ; <u>and</u></p>
6VAC20-171-60C	7	Renewal license application.	<p>Insert a new provision that businesses complete a self audit at time of renewal.  <u>7. A completed business license self audit form issued by the Department.</u></p>
6VAC20-171-60D		Renewal license application.	<p><b>Amend</b> subsection for clarity and to remove duplicate language. A compliance agent is held to the same standard under the Compliance agent requirements. In addition, the requirement was too broad the department added the language "in a private security services or related field", which reflected the industries under the Board's purview.                  D. Each <del>principal and compliance agent listed on the business applying for a license renewal application</del> shall be in good standing in every jurisdiction where licensed, registered or certified <u>in a private security services or related field</u>. This subsection shall not apply to any probationary periods during which the individual is eligible to operate under the license, registration or certification.</p>
6VAC20-171-70		Compliance agent training	<p><b>Amend</b> section title. The Training requirements have been established under a new subsection.</p>

		and certification	<del>Compliance agent training and certification requirements.</del>
6VAC20-171-70B2		Compliance agent training and certification	<b>Amend</b> to reflect current procedure. Cards are now scanned by the Department and only one card is required.  B. 2. Fingerprint <del>cards</del> <u>card</u> pursuant to 6VAC20-171-30;
6VAC20-171-70C		Compliance agent training and certification	<b>Strike</b> paragraph, this language is relocated to a new section 6 VAC 20-171-72  <del>C. Following review of all application requirements, the department shall assign the applicant to an entry level compliance agent training session provided by the department, at which the applicant must successfully complete the applicable entry level compliance agent training requirements pursuant to this chapter and achieve a passing score of 80% on the compliance agent examination.</del>
6VAC20-171-70	C 1-4	Compliance agent training and certification	<b>Insert</b> new language to reflect the application process, this information was never clearly outlined in the regulations.  <u>C. The department may issue a certification for a period not to exceed 24 months when the following are received by the department:</u> <u>1. A properly completed application provided by the department;</u> <u>2. The applicable, nonrefundable certification fee;</u> <u>3. Verification of eligibility pursuant to §9.1-139 (A) of the Code of Virginia; and</u> <u>4. Verification of satisfactory completion of department regulatory compliance entry-level training requirements pursuant to 6VAC20-171-72 of this chapter.</u>
6VAC20-171-70D		Compliance agent training and certification	<b>Strike</b> paragraph, this language is relocated to a new section 6 VAC 20-171-71 which outlines the renewal process.  <del>D. Following completion of the entry level training requirements, the compliance agent must complete in-service training pursuant to the compulsory minimum training standards set forth by this chapter.</del>
6VAC20-171-70	D	Compliance agent training and certification	<b>Reformat</b> outline  <del>E</del> . Each compliance agent 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.
6VAC20-171	<u>6VAC20-171-71.</u>	<u>Compliance Agent Certification Renewal Requirement</u>	<b>Insert</b> entire section. This process was spread throughout the regulations in different sections. This section will specifically focus on the renewal requirements for compliance agents and thus provide for a clear, concise process, eliminating confusion.



		<p><u>S</u></p>	<p><b><u>6VAC20-171-71. Compliance agent certification renewal requirements.</u></b></p> <p><u>A. Applications for certification 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 or email address provided by the certified compliance agent. However, if a renewal notification is not received by the compliance agent, it is the responsibility of the compliance agent to ensure renewal requirements are filed with the department. Certification renewal applications received by the department after the expiration date shall be subject to all applicable, nonrefundable renewal fees plus reinstatement fees.</u></p> <p><u>B. Each person applying for compliance agent certification renewal shall meet the minimum requirements for eligibility as follows:</u></p> <ol style="list-style-type: none"> <li><u>1. Successfully apply on an application provided by the department, and complete the in-service regulatory compliance agent classroom training session provided by the department, or successfully complete an approved online in-service training session pursuant to <a href="#">6VAC20-171-72</a>. Training must be completed within the 12 months immediately preceding the expiration date of the current certification pursuant to the certification training standards in <a href="#">6VAC20-171-72</a>; and</u></li> <li><u>2. Be in good standing in every jurisdiction where licensed, registered, or certified in private security services or related field. This subdivision shall not apply to any probationary periods during which the individual is eligible to operate under the license, registration, or certification.</u></li> </ol> <p><u>C. The department may renew a certification for a period not to exceed 24 months.</u></p> <p><u>D. The department may renew a certification when the following are received by the department:</u></p> <ol style="list-style-type: none"> <li><u>1. A properly completed renewal application provided by the department;</u></li> <li><u>2. The applicable, nonrefundable certification renewal fee; and</u></li> <li><u>3. Verification of satisfactory completion of department regulatory compliance agent in-service training pursuant to <a href="#">6VAC20-171-72</a>.</u></li> </ol> <p><u>E. Any renewal application received after the expiration date of a certification shall be subject to the requirements set forth by the reinstatement provisions of this chapter.</u></p>
	<p><u>6VAC20-171-72.</u></p>	<p><u>Compliance Agent Regulatory</u></p>	<p><b>Insert</b> entire section. This process was spread throughout the regulations in different sections. This section will specifically focus on the training requirements for</p>

		<p><u>Compliance Training Requirement</u> S.</p>	<p>compliance agents and thus provide for a clear, concise process, eliminating confusion.</p> <p><u>6VAC20-171-72. Compliance agent regulatory compliance training requirements.</u></p> <p><u>A. Each eligible person applying to attend a regulatory compliance entry-level or in-service training session provided by the department shall file with the department:</u></p> <p><u>1. A properly completed application provided by the department; and</u></p> <p><u>2. The applicable, nonrefundable application fee.</u></p> <p><u>Upon receipt of the training enrollment application the department will assign the applicant to a training session provided by the department. Applicants for initial certification as a compliance agent must achieve a minimum passing score of 80% on the entry-level regulatory compliance training examination.</u></p> <p><u>B. Department entry-level regulatory compliance training must be completed within 12 months of approval of application for an initial compliance agent certification.</u></p> <p><u>C. Each person certified by the department to act as a compliance agent shall complete the department in-service regulatory compliance training within the last 12-month period of certification.</u></p>
<p>6VAC20-171-80B2</p>		<p>Initial training school application.</p>	<p><b>Amend</b> to clarify insurance requirements.</p> <p>2. Documentation verifying that the applicant has secured a surety bond in the amount of \$100,000 executed by a surety company authorized to do business in Virginia, or a certificate of insurance reflecting the department as a certificate holder, showing a policy of comprehensive general liability insurance with a minimum coverage of \$100,000 <u>per individual occurrence</u> and \$300,000 <u>general aggregate</u> issued by an insurance company authorized to do business in Virginia;</p>
<p>6VAC20-171-80B4</p>		<p>Initial training school application.</p>	<p><b>Amend</b> language to provide for the implementation of an electronic licensing system.</p> <p>B. 4. For each applicant for certification as a private security services training school except sole proprietor and partnership, on a <del>form</del> <u>certification application</u> provided by the department, the identification number issued by the Virginia State Corporation Commission for verification that the entity is authorized to conduct business in the Commonwealth;</p>
<p>6VAC20-171-80B5</p>		<p>Initial training school</p>	<p><b>Strike</b> paragraph. Evolving technology and paperless documentation systems render this requirement obsolete</p>

		application.	and eliminates an unnecessary hardship for out of state schools.  <del>5. A physical location in Virginia where records required to be maintained by the Code of Virginia and this chapter are kept and available for inspection by the department. A post office box is not a physical location;</del>
6VAC20-171-80B6-11	5-7	Initial training school application.	<b>Renumber</b> subsections  <del>6</del> 5. On the training school certification application, designation of at least one individual as training director who is not designated as training director for any other training school, and who is certified as an instructor pursuant to Article 5 (6VAC20-171-100 et seq.) of this part. A maximum of four individuals may be designated as an assistant training director; <del>7</del> 6. A copy of the curriculum in course outline format for each category of training to be offered, including the hours of instruction with initial and in-service courses on separate documents; <del>8</del> 7. A copy of the training school regulations;
6VAC20-171-80B9		Initial training school application.	Delete requirement <del>9. A copy of the training completion certificate to be used by the training school;</del>
6VAC20-171-80B10	8	Initial training school application.	Renumber <del>40</del> 8. A copy of the range regulations to include the assigned DCJS range identification number if firearms training will be offered; and
6VAC20-171-80B	9-10	Initial training school application.	<b>Insert</b> new subsection that lists the categories of training for private security services training schools in which a fee is required for each additional category requested. <u>9. On the certification application, selection of the category of training the applicant is seeking to provide. The initial training school certification application fee includes one category. A separate fee will be charged for each additional category of training. The separate categories are identified as follows: (i) security officers/couriers/alarm respondent (armed and unarmed) to include arrest authority, (ii) private investigators, (iii) locksmiths, electronic security personnel to include central station dispatchers, (iv) armored car personnel, (v) personal protection specialists, (vi) detector canine handlers, security canine handlers, (vii) special conservators of the peace pursuant to § 9.1-150 of the Code of Virginia, (viii) bail bondsmen pursuant to § 9.1-185 of the Code of Virginia, bail enforcement agents pursuant to § 9.1-186 of the Code of Virginia and (ix) firearms.</u> <u>10. The applicable, nonrefundable category fee; and</u>

6VAC20-171-80C		Initial training school application.	<p><b>Amend</b> the paragraph to reflect current procedures</p> <p>C. When the department has received and processed a completed application and accompanying material, the department <del>shall</del> <u>may</u> inspect the training facilities <del>to ensure conformity with department policy</del>, including an inspection of the firearms range, if applicable, to ensure conformity with the minimum requirements set forth by this chapter.</p>
6VAC20-171-80F		Initial training school application.	<p><b>Insert</b> specific descriptions of what changes would constitute a new legal entity. The department receives numerous inquiries that reflect the need to provide specificity in the regulations.</p> <p>F. A new certification is required whenever there is any change in the ownership or type of organization of the certified entity that results in the creation of a new legal entity. <u>Such changes include but are not limited to:</u></p> <ol style="list-style-type: none"> <li><u>1. Death of a sole proprietor;</u></li> <li><u>2. Death or withdrawal of a general partner in a general partnership or the managing partner in a limited partnership; and</u></li> <li><u>3. Formation or dissolution of a corporation, a limited liability company, or an association or any other business entity recognized under the laws of the Commonwealth of Virginia.</u></li> </ol>
6VAC20-171-80G		Initial training school application.	<p><b>Strike</b> exception. This exception did not provide for consistency for all schools.</p> <p>G. Each certification shall be issued to the legal entity named on the application, whether it <del>be</del> <u>is</u> a sole proprietorship, partnership, corporation, or other legal entity, and shall be valid only for the legal entity named on the certification. No certification shall be assigned or otherwise transferred to another legal entity, <del>with the exception of a sole proprietorship or partnership that incorporates to form a new corporate entity where the initial licensee remains as a principal in the newly formed corporation. This exception shall not apply to any existing corporation that purchases the training school or assets of an existing sole proprietorship.</del></p>
6VAC20-171-90A		Renewal training school application.	<p><b>Insert</b> the requirement that schools provide an email address to the department. This is an attempt to move towards a paperless system.</p> <p>A. Applications for certification 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 <del>of</del> <u>or email address provided by</u> the certified training school.</p>

6VAC20-171-90C2		Renewal training school application.	<p><b>Amend</b> to clarify insurance requirements.</p> <p>2. Documentation verifying that the applicant has secured a surety bond in the amount of \$100,000 executed by a surety company authorized to do business in Virginia, or a certificate of insurance reflecting the department as a certificate holder, showing a policy of comprehensive general liability insurance with a minimum coverage of \$100,000 <u>per individual occurrence</u> and \$300,000 <u>general aggregate</u> issued by an insurance company authorized to do business in Virginia;</p>
6VAC20-171-90C5		Renewal training school application.	<p><b>Insert</b> language for clarity of fee requirements.</p> <p>5. The applicable, nonrefundable certification renewal fee- <u>and category fees;</u></p>
6VAC20-171-90C6		Renewal training school application.	<p><b>Insert</b> language for clarity of fee requirements and reference the section that specifies the categories of training.</p> <p><u>6. Any documentation required pursuant to 6VAC20-171-80 for any new categories of training; and</u></p>
6VAC20-171-90C7		Renewal training school application.	<p><b>Insert</b> a new requirement for schools to conduct a self audit at time of renewal.</p> <p><u>7. A completed training school certification self audit form issued by the Department.</u></p>
6VAC20-171-90D		Renewal training school application.	<p><b>Amend</b> subsection for clarity and to remove duplicate language. An instructor is held to the same standard under the Instructor requirements. In addition, the requirement was too broad, the department added the language “in a private security services or related field”, which reflected the industries under the Board’s purview</p> <p>D. Each <del>principal and instructor listed on the training school applying for a license certification renewal application</del> shall be in good standing in every jurisdiction where licensed, registered or certified <u>in private security services or related field</u>. This subsection shall not apply to any probationary periods during which the individual is eligible to operate under the license, registration or certification.</p>
6VAC20-171-90E		Renewal training school application.	<p><b>Insert</b> language for clarity – referring constituents to reinstatement provision.</p> <p>E. Any renewal application received after the expiration date of a certification shall be subject to the requirements set forth by the reinstatement provisions <del>of this chapter</del> <u>pursuant to 6 VAC 20-20-171-180.</u></p>

6VAC20-171-100A		Initial instructor application.	<b>Amend</b> sentence to correct grammar. A. Each person applying for certification as <u>an</u> instructor shall meet the following minimum requirements for eligibility:
6VAC20-171-100A4		Initial instructor application.	<b>Amend</b> sentence to correct grammar. 4. Have a minimum of (i) three years management or supervisory experience with a private security services business or with any federal, military police, state, county or municipal law-enforcement agency, or in a related field; or (ii) five years general experience in a private security services business, with a federal, state or local law-enforcement agency, or in a related field; or (iii) one year experience as an instructor or teacher at an accredited educational institution or agency in the subject matter for which certification is requested, or in a related field; <del>and</del>
6VAC20-171-100A5		Initial instructor application.	<b>Insert</b> sentence to reflect current eligibility requirements, this information was previously listed under B4 of this section.  <u>5. Have previous training and a minimum of two years work experience for those subjects in which certification is requested; and</u>
6VAC20-171-100A5	A6	Initial instructor application.	<b>Renumber</b> <del>56.</del> Be a United <del>State</del> <u>States</u> citizen or legal resident alien of the United States.
6VAC20-171-100B		Initial instructor application.	<b>Amend</b> to correct grammar. B. Each person applying for certification as <u>an</u> instructor shall file with the department:
6VAC20-171-100B2.		Initial instructor application.	<b>Amend</b> to reflect current process. The Department utilizes scanning procedures which removes the need for two cards. 2. Fingerprint <del>cards</del> <u>card</u> pursuant to 6VAC20-171-30;
6VAC20-171-100B4.		Initial instructor application.	<b>Strike</b> paragraph, the requirement was inserted under section 100A  <del>4. Official documentation verifying previous instructor experience, training, work experience and education for those subjects in which certification is requested. The department will evaluate qualifications based upon the justification provided;</del>
6VAC20-171-100B.	4	Initial instructor application.	<b>Insert</b> new subsection that lists the categories of training for private security services instructors in which a fee is required for each additional category requested. <u>4. On the certification application, selection of the category of training the applicant is seeking to provide. The initial</u>

			<p><u>instructor certification fee includes one category. A separate fee will be charged for each additional category of training. The separate categories are identified as follows: (i) security officers/couriers/alarm respondent (armed and unarmed) to include arrest authority, (ii) private investigators, (iii) locksmiths, electronic security personnel to include central station dispatchers, (iv) armored car personnel, (v) personal protection specialists, (vi) detector canine handlers, security canine handlers, (vii) special conservators of the peace pursuant to § 9.1-150 of the Code of Virginia, (viii) bail bondsmen pursuant to § 9.1-185 of the Code of Virginia, bail enforcement agents pursuant to § 9.1-186 of the Code of Virginia and (ix) firearms;</u></p>
6VAC20-171-100B5.	B5	Initial instructor application.	<p><b>Amend</b> to include category fee requirements 5. <u>The applicable, nonrefundable instructor certification application fee and category fee(s) if applicable; and</u></p>
6VAC20-171-100	C	Initial instructor application.	<p>Insert new subsection to provide for entry-level compliance regulatory training procedures:</p> <p><u>C. Following review of all application requirements, the department shall verify eligibility and authorize the applicant to submit a regulatory compliance training enrollment application for an entry-level instructor regulatory compliance classroom training session provided by the department, or approve the applicant for taking the approved online training session pursuant to 6VAC20-171-111, at which the applicant must successfully complete the applicable entry-level regulatory compliance training requirements pursuant to this chapter and achieve a passing score of 80% on the regulatory compliance examination.</u></p>
6VAC20-171-100C	D	Initial instructor application.	<p><b>Amend</b> due to reformatting</p> <p><del>C-D.</del> In addition to the instructor qualification requirements described in subsections A <del>and B</del> through C of this section, each applicant for certification as a firearms instructor shall submit to the department:</p>
6VAC20-171-100D2.		Initial instructor application.	<p><b>Insert</b> language for firearms instructors. This amendment is upon the recommendation of members of the industry and the Private Security Services Advisory Board to ensure the proper competency of the firearms instructors. Additional language has been inserted to reflect a course of fire for patrol rifle.</p> <p>2. <u>Official documentation in the form of a signed, dated range sheet with the qualification score and course of fire that the applicant has successfully qualified, with a minimum range qualification of 85%, with each of the following:</u></p>

			<p>a. A revolver;                  b. A semi-automatic handgun; and                  c. A shotgun.</p>
<p>6VAC20-171-100D3.</p>	<p>D3-5</p>	<p>Initial instructor application.</p>	<p><b>Insert</b> language for firearms instructors. This amendment is upon the recommendation of members of the industry and the Private Security Services Advisory Board to ensure the proper competency of the firearms instructors. Additional language has been inserted to reflect a course of fire for patrol rifle.</p> <p><u>3. Firearms instructors applying to provide patrol rifle training in accordance with 6 VAC 20-171-395 must submit official documentation in the form of a signed, dated range sheet that the applicant has successfully qualified, with a minimum range qualification of 85%, with a patrol rifle.</u></p> <p><u>4. Range qualifications must have been completed within the 12 months immediately preceding the instructor application date and have been completed at a Virginia criminal justice agency, training academy, correctional facility or a department approved range utilized by a certified private security training school. The qualifications must be documented by another instructor certified as a law enforcement firearms instructor or private security services firearms instructor.</u></p> <p>35. The firearms instructor training must have been completed within the three years immediately preceding the date of the instructor application; or in the event that the school completion occurred prior to three years, the applicant shall have provided firearms instruction during the three years immediately preceding the date of the instructor application.</p>



<p>6VAC20-171-100D-G.</p>	<p>E-H</p>	<p>Initial instructor application.</p>	<p><b>Reformat</b>  <del>D.E.</del> Upon completion of the initial instructor application requirements, the department may issue an initial certification for a period not to exceed 24 months.  <del>E.F.</del> The department may issue a letter of temporary certification to instructors for not more than 120 days while awaiting the results of the state and national fingerprint search provided the applicant has met the necessary conditions and requirements.  <del>F.G.</del> Each certification shall be issued to the individual named on the application and shall be valid only for use by that individual. No certification shall be assigned or otherwise transferred to another individual.  <del>G.H.</del> Each instructor 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>6VAC20-171-110A</p>		<p>Renewal instructor application.</p>	<p><b>Insert</b> the requirement that instructors provide an email address to the department. This is an attempt to move towards a paperless system.  A. Applications for certification 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 <del>of</del> <u>or email address provided by</u> the certified instructor.</p>
<p>6VAC20-171-110B1</p>		<p>Renewal instructor application.</p>	<p><b>Strike</b> the reference to section 360. The training requirements have been included in this section under B2.  B. 1. Successfully complete the in-service <del>training regulatory compliance classroom or online training session provided by the department within the 12 months immediately preceding the expiration date of the current certification; pursuant to the compulsory minimum training standards in 6VAC20-171-360; and</del></p>
<p>6VAC20-171-110B</p>	<p>B2</p>	<p>Renewal instructor application.</p>	<p><b>Insert</b> continuing education requirement, this provision relocated from section 6VAC20-171-360.   <u>2. Successfully complete a minimum of 4 hours of continuing education in instructor development. Training must be completed within the 12 months immediately preceding the expiration date of the current certification;</u></p>
<p>6VAC20-171-110B4</p>		<p>Renewal instructor application.</p>	<p><b>Insert</b> language for specificity. The requirement was too broad, the department added the language “in a private security services or related field”, which reflected the industries under the Board’s purview</p>

			<p><del>2, 3.</del> Be in good standing in every jurisdiction where licensed, registered or certified in <u>a private security services or related field</u>. This subdivision shall not apply to any probationary periods during which the individual is eligible to operate under the license, registration or certification.</p>
6VAC20-171-110D1-2		Renewal instructor application.	<p><b>Amend</b> for grammatical purpose.                  D.1. A properly completed renewal application provided by the department; <del>and</del>                  2. <del>The applicable, nonrefundable certification renewal fee-</del> <u>and applicable category fees;</u></p>
6VAC20-171-110D	D3-8	Renewal instructor application.	<p><b>Insert</b> specific requirements for instructor renewal. Section 3 and 6 are new requirements. Members of the industry as well as the Private Security Services Advisory Board training committee recommended additional continuing education and specific documentary evidence for firearms instructors in order to ensure continued competency in the categories of service the instructor was certified to instruct.</p> <p><u>3. Any documentation required pursuant to <a href="#">6VAC20-171-100</a> for any new categories of training.</u></p> <p><u>4 Verification of satisfactory completion of regulatory compliance in-service training provided by the department;</u></p> <p><u>5 Verification of satisfactory completion of instructor development continuing education requirements;</u></p> <p><u>6. For firearms instructors, official documentation in the form of a signed, dated range sheet along with the qualification score and course of fire, with a minimum range qualification of 85%, with each of the following:</u></p> <p><u>a. A revolver;</u></p> <p><u>b. A semi-automatic handgun; and</u></p> <p><u>c. A shotgun.</u></p> <p><u>7. Firearms instructors applying to provide patrol rifle training in accordance with <a href="#">6VAC20-171-395</a> must submit official documentation in the form of a signed, dated range sheet that the applicant has successfully qualified, with a minimum range qualification of 85%, with a patrol rifle.</u></p> <p><u>8. Range qualifications must have been completed within the 12 months immediately preceding the instructor application date and have been completed at a Virginia criminal justice agency, training academy, correctional facility, or a department approved range utilized by a certified private security training school. The qualifications must be documented by another instructor certified as a law-enforcement firearms instructor or private security services firearms instructor.</u></p>
6VAC20-171-110E		Renewal instructor	<p><b>Delete</b> of this chapter and <b>insert</b> pursuant to <a href="#">6VAC20-171-180</a></p>

	<p><u>6VAC20-171-111.</u></p>	<p>application  <u>Instructor  Regulatory  Compliance  Training  Requirement  s.</u></p>	<p><b>Insert</b> new section to specifically outline the application process and requirements for the Department’s regulatory compliance training.</p> <p><u>6VAC20-171-111. Instructor regulatory compliance training requirements.</u></p> <p><u>A. Each eligible person applying to attend a regulatory compliance entry-level or in-service training session provided by the department shall file with the department:</u></p> <ol style="list-style-type: none"> <li><u>1. A properly completed application provided by the department; and</u></li> <li><u>2. The applicable, nonrefundable application fee.</u></li> </ol> <p><u>Upon receipt of the training enrollment application the department will assign the applicant to a regulatory compliance training session provided by the department. Applicants for initial certification as an instructor must achieve a minimum passing score of 80% on the entry-level regulatory compliance examination.</u></p> <p><u>B. Department entry-level regulatory compliance training must be completed within 12 months of approval of application for an initial instructor certification.</u></p>
	<p><u>6VAC20-171-115.</u></p>	<p><u>Initial  Detector  Canine  Handler  Examiner  Certification.</u></p>	<p><b>Insert</b> entire section in regard to the certification of Detector Canine Handler Examiners pursuant to §9.1-138 et seq. The Department met with members of the Detector Canine industry to establish the qualifications and processes necessary to ensure competency of certified examiners.</p> <p><b><u>6VAC20-171-115. Initial detector canine handler examiner certification.</u></b></p> <p><u>A. Each person applying for certification as a detector canine handler examiner shall meet the following minimum requirements for eligibility:</u></p> <ol style="list-style-type: none"> <li><u>1. Be a minimum of 18 years of age;</u></li> <li><u>2. Have a high school diploma or equivalent (GED);</u></li> <li><u>3. Have a minimum of five years experience as a detector canine handler and a minimum of two years experience as a detector canine trainer;</u></li> <li><u>4. Have an active certification as a detector canine handler examiner or equivalent credential from a department approved national organization, unit of the United States military, or other formal entity; or be sponsored by a certified DCJS private security services detector canine handler examiner;</u></li> <li><u>5. Successfully pass a written examination and performance evaluations according to department</u></li> </ol>

			<p><u>guidelines; and</u></p> <p><u>6. Be a United States citizen or legal resident alien of the United States.</u></p> <p><u>B. Each person applying for certification as a detector canine handler examiner shall file with the department:</u></p> <ol style="list-style-type: none"> <li><u>1. A properly completed application provided by the department;</u></li> <li><u>2. Fingerprint card pursuant to <a href="#">6VAC20-171-30</a>;</u></li> <li><u>3. Official documentation according to subdivisions A 3 and 4 of this section; and</u></li> <li><u>4. The applicable, nonrefundable application fee.</u></li> </ol> <p><u>C. Following review of all application requirements, the department shall verify eligibility and authorize the applicant to submit a regulatory compliance training enrollment application pursuant to <a href="#">6VAC20-171-117</a> for an entry-level classroom training session provided by the department, or approve the applicant for taking the approved online training session pursuant to <a href="#">6VAC20-171-117</a>, at which the applicant must successfully complete the applicable entry-level regulatory compliance training requirements pursuant to this chapter and achieve a passing score of 80% on the examination.</u></p> <p><u>D. Upon completion of the initial detector canine handler examiner application requirements, the department may issue an initial certification for a period not to exceed 24 months.</u></p> <p><u>E. The department may issue a letter of temporary certification to detector canine handler examiners for not more than 120 days while awaiting the results of the state and national fingerprint search provided the applicant has met the necessary conditions and requirements.</u></p> <p><u>F. Each certification shall be issued to the individual named on the application and shall be valid only for use by that individual. No certification shall be assigned or otherwise transferred to another individual.</u></p> <p><u>G. Each detector canine handler examiner 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.</u></p>
-	<u><a href="#">6VAC20-171-116</a>.</u>	<u>Renewal Detector Canine Handler Examiner Certification</u>	<p><b>Insert</b> entire section in regard to the renewal certification of Detector Canine Handler Examiners pursuant to §9.1-138 et seq. The Department met with members of the Detector Canine industry to establish the qualifications and processes necessary to ensure the continued competency of certified examiners.</p> <p><b><u><a href="#">6VAC20-171-116. Renewal detector canine handler examiner certification.</a></u></b></p>

			<p><u>A. Applications for certification 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 certified examiner. However, if a renewal notification is not received by the examiner, it is the responsibility of the examiner to ensure renewal requirements are filed with the department. Certification renewal applications received by the department after the expiration date shall be subject to all applicable, nonrefundable renewal fees plus reinstatement fees.</u></p> <p><u>B. Each person applying for examiner certification renewal shall meet the minimum requirements for eligibility as follows:</u></p> <ol style="list-style-type: none"> <li><u>1. Have maintained certification as a detector canine handler examiner or equivalent credential according to <a href="#">6VAC20-171-115</a> A 4 and demonstrate the completion of a minimum of 16 hours of continuing education during the previous certification period;</u></li> <li><u>2. Successfully complete the in-service regulatory compliance classroom or online training session provided by the department within the 12 months immediately preceding the expiration date of the current certification; and</u></li> <li><u>3. Be in good standing in every jurisdiction where licensed, registered, or certified. This subdivision shall not apply to any probationary periods during which the individual is eligible to operate under the license, registration, or certification.</u></li> </ol> <p><u>C. The department may renew a certification for a period not to exceed 24 months.</u></p> <p><u>D. The department may renew a certification when the following are received by the department:</u></p> <ol style="list-style-type: none"> <li><u>1. A properly completed renewal application provided by the department;</u></li> <li><u>2. The applicable, nonrefundable certification renewal fee; and</u></li> <li><u>3. Official documentation according to subsection B.</u></li> </ol> <p><u>E. Any examiner renewal application received by the department shall meet all renewal requirements prior to the expiration date of a certification or shall be subject to the requirements set forth by the reinstatement provisions of this chapter.</u></p>
	<p><u>6VAC20-171-117.</u></p>	<p><u>Detector Canine Handler Examiner Regulatory Compliance Training Enrollment</u></p>	<p><b>Insert</b> entire section in regard to the compliance regulatory training requirement for certification of Detector Canine Handler Examiners pursuant to §9.1-138 et seq. The Department met with members of the Detector Canine industry to establish the qualifications and processes necessary to ensure the continued competency of certified examiners.</p>

			<p><u>6VAC20-171-117. Detector canine handler examiner regulatory compliance training enrollment.</u></p> <p><u>A. Each eligible person applying to attend a regulatory compliance entry-level or in-service training session provided by the department shall file with the department:</u></p> <ol style="list-style-type: none"> <li><u>1. A properly completed application provided by the department; and</u></li> <li><u>2. The applicable, nonrefundable application fee.</u></li> </ol> <p><u>Upon receipt of the training enrollment application the department will assign the applicant to a regulatory compliance examiner training session provided by the department, at which the applicant must successfully complete the applicable training requirements. Applicants for initial certification as an examiner must achieve a minimum passing score of 80% on the entry-level examination.</u></p> <p><u>B. Department entry-level regulatory compliance training must be completed within 12 months of approval of application for an initial examiner certification.</u></p>
6VAC20-171-120A		Initial registration application.	<p><b>Amend</b> the language to include new categories of registration pursuant to §9.1-138 et seq. In addition provide a reference to the firearm endorsement requirements outlined in the regulations.</p> <p>A. Individuals required to be registered, pursuant to § 9.1-139 C of the Code of Virginia, in the categories of armored car personnel, courier, unarmed security officer, armed security officer, security canine handler, <u>explosives detector canine handler, narcotics detector canine handler, private investigator, personal protection specialist, alarm respondent, locksmith, central station dispatcher, electronic security sales representative, electronic security technician, or electronic security technician's assistant</u> shall meet all registration requirements in this section. Prior 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 a firearm endorsement <u>pursuant to 6 VAC 20-171-140</u>. If carrying a handgun concealed, the individual must also have a valid concealed handgun permit and the written permission of his employer pursuant to § 18.2-308 of the Code of Virginia.</p>
6VAC20-171-120B2		Initial registration application.	<p><b>Amend</b> reference to reflect reformatting of the training standards sections.</p> <p>B. 2. Successfully complete all initial training requirements</p>

			for each registration category <u>requested</u> , including firearms endorsement if applicable, <del>requested</del> pursuant to the compulsory minimum training standards in <del>6VAC20-171-360</del> <u>6VAC20-171-350</u> ; and
6VAC20-171-120B	4	Initial registration application.	<b>Insert</b> provision to reflect current process. The Department no longer utilizes DMV to take pictures and issue credentials. 4. <u>Have a photo taken by a certified private security services training school or other site approved by the department.</u>
6VAC20-171-120C3		Initial registration application.	<b>Amend</b> language to reflect current process. The department scans fingerprint cards thus eliminating the need for two cards. C. 3. Fingerprint <del>cards</del> <u>card</u> pursuant to 6VAC20-171-30; and
6VAC20-171-120D		Initial registration application.	<b>Insert</b> the registration category of locksmith according to §9.1-139 (H)  D. Each person seeking or required to seek registration as unarmed security officer, alarm respondent, <u>locksmith</u> , central station dispatcher, electronic security sales representative, electronic security technician, or electronic security technician's assistant may be employed for a period not to exceed 90 consecutive days in any categories listed above while completing the compulsory minimum training standards, provided:
6VAC20-171-120D1		Initial registration application.	<b>Amend</b> language to reflect current process. The department scans fingerprint cards thus eliminating the need for two cards. 1. <del>Fingerprint cards</del> <u>Fingerprints</u> have been submitted pursuant to 6VAC20-171-30;
6VAC20-171-120E		Initial registration application.	<b>Strike</b> language in regard to a registration letter being submitted to DMV. The Department no longer utilizes DMV to issue credentials. E. Upon completion of the initial registration application requirements, the department may issue an initial registration <del>letter</del> for a period not to exceed 24 months. <del>This registration letter shall be submitted by the applicant to the Virginia Department of Motor Vehicles or other specified entity for a state-issued photo identification card.</del>
6VAC20-171-120F.		Initial registration application.	<b>Insert</b> the word valid after the word registration.
6VAC20-171-130A		Renewal registration application.	<b>Insert</b> language to clarify that all renewal requirements must be met prior to submittal of the renewal application and provide the option to send renewals electronically in an attempt to move towards a paperless system. A. Applications for registration renewal <u>shall meet all</u>

			<p><u>renewal requirements and</u> 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 <del>of</del> <u>or email address provided by</u> the registered individual. However, if a renewal notification is not received by the individual, it is the responsibility of the individual to ensure 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>
6VAC20-171-130B	3	Renewal registration application.	<p><b>Insert</b> new language that will allow for the department to request an updated photo.  <u>3. Upon the request of the department, have a new digital photo taken by a certified private security services training school or other site approved by the department.</u></p>
6VAC20-171-130C2		Renewal registration application.	<p><b>Amend</b> language to reflect the need for one card. The department instituted a scanning process that eliminates the need for duplicate cards.                  C. 2. For individuals applying for renewal with the category of armored car personnel, fingerprint <del>cards</del> <u>card</u> submitted pursuant to 6VAC20-171-30;</p>
6VAC20-171-130C3		Renewal registration application.	<p><b>Amend</b> for grammatical purpose                  3. The applicable, nonrefundable registration renewal fee; <del>and</del></p>
6VAC20-171-130C4		Renewal registration application.	<p><b>Amend</b> reference to reflect changes in the firearms section of the regulations.                  4. For individuals with firearms endorsements, evidence of completion of annual firearms retraining in accordance with <del>6VAC20-171-400.</del> <u>Part V, Article 2 of this chapter.</u></p>
6VAC20-171-130D		Renewal registration application.	<p><b>Strike</b> requirements in regard to submitting a letter to DMV. The department no longer utilizes DMV to issue credentials.                  D. Upon completion of the renewal registration application requirements, the department may issue a registration <del>letter</del> for a period not to exceed 24 months. <del>This registration letter shall be submitted by the applicant to the Virginia Department of Motor Vehicles or other specified entity for a state-issued photo identification card.</del></p>
6VAC20-171-130E.		Renewal registration application.	<p><b>Insert</b> reference to reinstatement provisions.                  E. Any renewal application received by the department shall meet all renewal requirements prior to the expiration date of a registration or shall be subject to the requirements set forth by the reinstatement provisions pursuant to <u>6 VAC 20-171-180.</u></p>
	6VAC20-171-135	Firearms Endorsement	<p><b>Insert</b> section specific to firearms endorsements. The requirements have not changed but adding a specific section provides clear and concise information to the</p>



			<p>applicant on the requirements and the application and training processes formally spread throughout the regulations.</p> <p><b><u>6VAC20-171-135. Firearms endorsement.</u></b></p> <p><u>A. A firearms endorsement is required for all private security services business personnel who carry or have access to a firearm while on duty. Each person who carries or has access to firearms while on duty shall qualify with each type of action and caliber of firearm to which he has access.</u></p> <p><u>B. Each person applying for a firearms endorsement shall meet the minimum requirements for eligibility as follows:</u></p> <ol style="list-style-type: none"> <li><u>1. Must be registered in a regulated category.</u></li> <li><u>2. Must complete handgun, and if applicable, shotgun and patrol rifle training as described in Part V, Article 2 (6VAC20-171-365 et seq.) of this chapter.</u></li> </ol> <p><u>C. All armed private security services business personnel with the exception of personal protection specialist must satisfactorily complete firearms retraining prescribed in 6VAC20-171-400.</u></p> <p><u>D. All armed personal protection specialist must satisfactorily complete firearms retraining prescribed in 6VAC20-171-420.</u></p> <p><u>E. Firearms endorsements are issued for a period not to exceed 12 months. Individuals must complete firearms retraining within the 120 days prior to the expiration of their current firearm endorsement or will be required to complete entry-level training requirements prior to applying for an active endorsement.</u></p>
6VAC20-171-160C		Additional category application	<p><b>Delete</b> the word certification based on the new instructor category fee requirements of 6VAC20-171-100.</p>
6VAC20-171-170.		Replacement state issued photo identification letter.	<p><b>Amend</b> first sentence by striking the word “letter” and inserting <u>card</u> to reflect proper language. The Department no longer issues a letter but issues the actual photo ID card.</p> <p>Registered <u>or certified</u> individuals seeking a replacement state issued photo identification <del>letter</del> <u>card</u> shall submit to the department:</p>
6VAC20-171-180A		Reinstatement	<p><b>Amend</b> first sentence of paragraph to include specific certification categories according to §9.1-138.</p> <p>A. Any business license, training school, <u>instructor, compliance agent, detector canine handler examiner certification, instructor certification</u> or registration not renewed on or before the expiration date shall become null and void. Pursuant to the Code of Virginia, all such persons must currently be licensed, registered or certified with the department to provide private security services.</p>

6VAC20-171-180B		Reinstatement	<p><b>Insert</b> the word certification in the section, this language was inadvertently left out.</p> <p>In addition the language in regard to the prohibition of reinstating a license or school has been <b>stricken</b>. Requiring an entity to resubmit for an initial credential causes an undue hardship and the department will handle lapses in insurance through disciplinary measures.</p> <p>B. A renewal application must be received by the department within 60 days following the expiration date of the license, <u>certification</u> or registration in order to be reinstated by the department providing all renewal requirements have been met.</p> <p>The department shall not reinstate renewal applications received after the 60-day reinstatement period has expired. It is unlawful to operate without a valid registration, <u>certification</u>, or license including during reinstatement period.</p> <p><del>The department shall not reinstate business licenses or training school certifications that have become null and void due to not maintaining required insurance or surety bond coverage.</del></p>
6VAC20-171-180	E	Reinstatement	<p><b>Insert</b> new provision that reflects the current procedures utilized when reinstating a credential. The department receives numerous inquiries in regard to the process and adding this provision will clarify the process</p> <p><u>E. When a license, certification or registration is reinstated, the applicant shall continue to have the same DCJS number and shall be assigned an expiration date two years from the previous expiration date of the license, certification or registration.</u></p>
6VAC20-171-180	F-I	Reinstatement	<p><b>Insert</b> provisions in regard to the period of reinstatement. Under the current regulations the applicant must cease and desist all operations which may cause undue hardship on a business/school or individual. In addition, the department did not have authority over the applicant should they either have continued to provide regulated services and were in noncompliance of the Code and Regulations. These provisions fully supported by the department were recommended by members of the industry.</p> <p><u>F. An applicant who reinstates shall be regarded as having been continuously licensed, certified or registered without interruption. Therefore the applicant shall remain under the disciplinary authority of the department during this entire period and may be held accountable for his activities during this period.</u></p> <p><u>G. A person who fails to reinstate his license, certification or registration shall be regarded as unlicensed, uncertified or unregistered from the expiration date of the license, certification or registration forward.</u></p> <p><u>H. Nothing in this chapter shall divest the department of its authority to discipline a person for a violation of the law or</u></p>

			<p><u>regulations during the period of time for which the person was licensed, certified or registered.</u></p> <p><u>I. Firearms endorsements are not eligible for reinstatement. If renewal requirements are not met pursuant to 6VAC20-171-135, the applicant shall meet all initial application requirements, including applicable initial firearms training requirements.</u></p>
6VAC20-171-190A4		Renewal extension	<p><b>Insert</b> a specific description of an emergency temporary assignment. This recommendation is was submitted by members of the industry and supported by the Department to ensure clarification of what the department will issue an extension for.</p> <p>A. 4. Any emergency temporary assignment of private security personnel <u>for purposes of (i) natural disaster, (ii) homeland security or (iii) documented threat</u>, by the private security services business or training school for which he is employed.</p>
6VAC20-171-190B1		Renewal extension	<p><b>Insert</b> a provision at the end of the paragraph that allows for the department to waive this requirement based on justifiable circumstances.</p> <p>B. 1. Be submitted in writing, dated and signed by the individual or principal of a licensed entity prior to the expiration date of the time limit required for completion of the requirements. <u>This requirement may be waived by the department based on an evaluation of the justification for waiver.</u></p>
6VAC20-171-190B3		Renewal extension	<p><b>Insert</b> language for consistency with 190A4.</p> <p>3. Include a copy of the physician's record of the injury or illness, <del>or</del> a copy of the government orders <u>or documentation of emergency temporary assignment.</u></p>
6VAC20-171-190C		Renewal extension	<p><b>Strike</b> this provision based on the inclusion of allowing the department to waive the restrictions of an extension under B1.</p> <p><del>C. No extension will be approved for registrations, certifications, or business licenses that have expired.</del></p>
6VAC20-171-190D		Renewal extension	<p><b>Reformat</b> outline</p> <p><del>D.</del> Applications for additional extensions may be approved upon written request of the person, business, or training school.</p>
6VAC20-171-190	D	Renewal extension	<p><b>Insert</b> provision that specifies the current policy utilized by the Department. Providing more than a 12 month extension could result in an individual having more then 3 years of time with out continuing education.</p> <p><u>D. The total time for renewal extension, including additional extensions, shall not exceed 12 months beyond the original expiration date. If renewal requirements are not met during the period of extension, the individual must</u></p>

			<u>complete all initial training requirements to include applicable entry-level training.</u>
6VAC20-171-190E.		Renewal extension	<p>Amend to allow for an emergency exemption pursuant to 9.1-139.</p> <p>E. The private security services person, business, or training school shall be nonoperational during the period of extension <u>unless otherwise issued a temporary exemption has been authorized by the department pursuant to §9.1-139 of the Code of Virginia.</u></p>
6VAC20-171-200B.		Denial, probation, suspension and revocation.	<p><b>Insert</b> language. The requirement was too broad, the department added the language “in a private security services or related field”, which reflected the industries under the Board’s purview</p> <p>B. The department may deny a license, registration or certification in which any person or principal of an applying business or training school has not maintained good standing in every jurisdiction where licensed, registered or certified <u>in a private security services or related field</u>; or has had his license, registration or certification denied upon initial application, suspended, revoked, surrendered, or not renewed; or has otherwise been disciplined in connection with a disciplinary action prior to applying for licensing, registration or certification in Virginia.</p>
6VAC20-171-200D		Denial, probation, suspension and revocation.	<p><b>Amend</b> language to include all credentials under the authority of the Department and Board.</p> <p>D. The department may deny licensure <del>to a firm,</del> <u>certification or registration</u> for other just cause.</p>
6VAC20-171-200E		Denial, probation, suspension and revocation.	<p><b>Insert</b> detector canine handler examiner certification in accordance with §9.1-138.</p> <p>E. A licensee, training school, compliance agent, instructor, <u>detector canine handler examiner,</u> or registered individual shall be subject to disciplinary action for violations or noncompliance with the Code of Virginia or this chapter. Disciplinary action shall be in accordance with procedures prescribed by the Administrative Process Act. The disciplinary action may include but is not limited to a letter of censure, fine, probation, suspension or revocation.</p>
6VAC20-171-200	F	Denial, probation, suspension and revocation.	<p><b>Insert</b> a provision to contact the employer if a regulated individual is subject to disciplinary action. This was recommended by the industry and the department supports this provision.</p> <p><u>F. If a registrant or certified person is subject to disciplinary action for violations or noncompliance with the Code of Virginia or this chapter, the department will notify the last known licensed or certified private security services business or training school by which they were employed or affiliated.</u></p>

6VAC20-171-215.		General requirements.	<b>Insert</b> all regulated entities in this sentence and remove all further references in articles within this part of the chapter. All private security <u>services registered and certified personnel, licensed businesses and certified training schools</u> are required to maintain administrative requirements and standards of conduct as determined by the Code of Virginia, department guidelines and this chapter.
6VAC20-171-220.1		Business administrative requirements.	<b>Insert</b> the requirement that schools provide an email address to the department. This is an attempt to move towards a paperless system.  1. Maintain at all times with the department its physical <del>location in Virginia where records required to be maintained by the Code of Virginia and this chapter are kept and available for inspection by the department</del> <u>address and email address if applicable</u> . A post office box is not a physical <del>location</del> <u>address</u> . <del>Such notification</del> <u>Notification of any change shall be in writing and received by the department no later than 10 days after the effective date of the change.</u>
6VAC20-171-220.2		Business administrative requirements.	<b>Insert</b> language to include fictitious names. It is a requirement that a business file fictitious names with the department and this language was inadvertently left out of administrative requirements.  2. Maintain at all times with the department its current operating name <u>and all fictitious names</u> .
6VAC20-171-220.5		Business administrative requirements.	<b>Amend</b> provision to reflect changes made in the section addressing reinstatement under 6VAC20-181B. Requiring an entity to resubmit for an initial credential causes an undue hardship and the department will handle lapses in insurance through disciplinary measures.  5. Maintain at all times current liability coverage at least in the minimum amounts prescribed by the application requirements of this chapter. <del>Failure of the business to do so shall result in the license becoming null and void. Each</del> <u>day of uninsured activity would be construed as an individual violation of this requirement.</u>
6VAC20-171-220.8		Business administrative requirements.	<b>Insert</b> <u>or electronic images</u> in order to stay abreast of evolving technology and initiatives to create a paperless process.  8. Maintain at all times and for a period of not less than three years from the date of termination of employment the following documentation concerning all regulants: <u>documentation or electronic images</u> of the date of hire in the regulated category, documentation that the fingerprint processing application was submitted on the date of hire, verification that the employee is a U.S. citizen or legal

			resident alien and is properly registered/certified and trained, current physical and mailing addresses for all regulated employees and telephone numbers if applicable.
6VAC20-171-220.9		Business administrative requirements.	<p><b>Insert</b> a sentence requiring the business to provide a notification of the individual who will be responsible for the company and regulated employees compliance during the interim period.</p> <p>9. Upon termination of employment of a certified compliance agent, notify the department in writing within 10 calendar days. <u>This notification shall include the name of the individual responsible for the licensee's adherence to applicable administrative requirements and standards of conduct during the period of replacement.</u></p>
6VAC20-171-220.10		Business administrative requirements.	In the last sentence, <b>strike</b> the word <del>Such</del> and <b>insert</b> the word <u>This</u> .
6VAC20-171-220.13		Business administrative requirements.	<p><b>Insert</b> language to limit the reporting of convictions to those that could result in the ineligibility of a licensure/registration or certification pursuant to the Code.</p> <p>13. Inform the department in writing within 10 days of receiving knowledge of any principal, partner, officer, compliance agent or employee regulated or required to be regulated by this chapter pleading guilty or nolo contendere or being convicted or found guilty of any felony or of a misdemeanor <u>as outlined in §9.1-139 (K) of the Code of Virginia.</u></p>
6VAC20-171-220.15		Business administrative requirements.	<p><b>Amend</b> for grammatical correction</p> <p>15. On a form provided by the department and within 10 calendar days of receiving knowledge of <del>the</del><u>an</u> incident, submit a report of any incident in which any registrant has discharged a firearm while on duty, excluding any training exercise.</p>
6VAC20-171-220.18		Business administrative requirements.	<p><b>Insert</b> language to include the transferring of monitoring services to ensure that all circumstances are addressed.</p> <p>18. In the event a licensee sells or otherwise transfers the ownership of a monitoring agreement of an electronic security customer <u>in Virginia</u>, notify the end user, in writing, within 30 days of the transfer of monitoring services. No licensee shall <u>sell or otherwise transfer</u> to an entity not licensed in Virginia.</p>
6VAC20-171-220.19		Business administrative requirements.	<p><b>Amend</b> the language to reflect the current process in place</p> <p>19. Ensure that all regulated employees carry <del>a state-</del>the department issued photo identification <u>registration</u> card <del>along with their registration or certification card, unless the card is one in the same or temporary registration letter</del></p>

			<u>along with a photo ID while on duty.</u>
6VAC20-171-220.	20	Business administrative requirements.	<p><b>Insert</b> provision for businesses to require employees who provide regulated services for up to 120 days while completing training and obtaining their registrations to carry a photo id and department documentation.</p> <p><u>20. Ensure that all regulated employees authorized to provide private security services while completing compulsory minimum training standards pursuant to §9.1-139 (H) of the Code of Virginia carry a photo ID along with an authorization form provided by the Department while on duty.</u></p>
6VAC20-171-220.	21	Business administrative requirements.	<p><b>Insert</b> provision for written use of force policies. Many businesses were not maintaining a use of force policy and investigative records reflect numerous situations of negligence use of firearms and reports of injury to citizens. This provision will provide documentation as well as ensure verification that a business is aware of which employees utilize firearms or intermediate weapons and set individual business standards.</p> <p><u>21. Maintain a written use of force policy dictating the business' policy for using deadly force and for use of less lethal force. A statement certifying that the employee has read and understands the business' use of force policy must be signed by each employee who is permitted to carry firearms or intermediate weapons and maintained in the employee's file.</u></p>
6VAC20-171-220.	22	Business administrative requirements.	<p><b>Insert</b> provision to ensure that the business is aware of the regulated individuals utilizing intermediate weapons have completed proper training. This information is not maintained by the Department and must be maintained by the individual businesses for the purpose of public safety.</p> <p><u>22. Maintain records for individual employees permitted to carry intermediate weapons while on duty to verify training in the use of the permitted intermediate weapons.</u></p>
6VAC20-171-220.	23	Business administrative requirements.	<p><b>Insert</b> provision in accordance with setting business administrative requirements pursuant to the Code §9.1-138 et seq. in regard to businesses that provide detector canine services.</p> <p><u>23. Maintain at all times and for a period of not less than three years from the date of termination, decertification or other separation, records of detector canine handler team certifications to include a photo of detector canine teams utilized to provide regulated private security services as defined in this chapter.</u></p>

<p>6VAC20-171-230.4b</p>		<p>Business standards of conduct.</p>	<p><b>Amend</b> subsection to include proper terminology for armed alarm respondents and to include detector canine handlers pursuant to the Code §9.1-139.</p> <p>4.b. A licensee shall not allow individuals requiring registration as armored car personnel, armed security officers/couriers, <u>armed alarm</u> respondents with firearm endorsement, private investigators, personal protection specialists, <u>detector canine handlers</u> or security canine handlers to perform private security services until such time as the individual has been issued a registration by the department;</p>
<p>6VAC20-171-230.4c</p>		<p>Business standards of conduct.</p>	<p><b>Amend</b> subsection to include proper terminology for unarmed alarm respondents and armored car driver and to include locksmiths and remove armored car drivers pursuant to the Code §9.1-139(H)</p> <p>c. A licensee may employ individuals requiring registration as <u>unarmed alarm respondent</u> <del>without firearm endorsement</del>, <u>locksmith</u>, central station dispatcher, electronic security sales representative, electronic security technician, <u>unarmed armored car driver</u>, unarmed security officer or <u>electronic security technician's assistant</u> for a period not to exceed 90 consecutive days in any registered category listed above while completing the compulsory minimum training standards provided:</p> <p>(1) delete <del>cards have</del> and insert <u>card has</u></p>
<p>6VAC20-171-230.7</p>		<p>Business standards of conduct.</p>	<p><b>Insert</b> <u>electronic images</u> in order to stay abreast of evolving technology and initiatives to create a paperless process.</p> <p>7. Permit the department during regular business hours to inspect, review, or copy those documents, <u>electronic images</u>, business records or training records that are required to be maintained by the Code of Virginia and this chapter.</p>
<p>6VAC20-171-230.11</p>		<p>Business standards of conduct.</p>	<p><b>Amend</b> language to restrict individuals from assisting others in receiving a credential through fraud or misrepresentation.</p> <p>11. Not obtain <u>or aid and abet others to obtain</u> a license, license renewal, registration, registration renewal, certification, certification renewal, or firearms endorsement through any fraud or misrepresentation.</p>
<p>6VAC20-171-230.12</p>		<p>Business standards of conduct.</p>	<p><b>Amend</b> language to provide specific clarity for businesses that contract with other businesses in providing private security services.</p> <p>12. Include the business license number issued by the department on all business advertising materials pursuant to the Code of Virginia. <u>Business advertising materials</u></p>



			<u>containing information regarding more than one licensee must contain the business license numbers of each licensee identified.</u>
6VAC20-171-230.18		Business standards of conduct.	<b>Amend</b> language to provide specificity of what is authorized by the Code. 18. Utilize vehicles for private security services using or displaying <del>a</del> <u>an amber</u> flashing light only as specifically authorized by § 46.2-1025.9 of the Code of Virginia.
6VAC20-171-230.19		Business standards of conduct.	<b>Insert</b> <u>of the Commonwealth</u> to provide clarity.  19. Not use or display the state seal of Virginia or the seal of the Department of Criminal Justice Services, or any portion thereof, or the seal of any political subdivision <u>of the Commonwealth</u> , or any portion thereof, as a part of any logo, stationery, letter, training document, business card, badge, patch, insignia or other form of identification or advertisement.
6VAC20-171-230.25		Business standards of conduct.	<b>Insert</b> the requirement that binding arbitrations are also satisfied in order to protect the general public utilizing private security services  25. Satisfy all judgments <u>to include binding arbitrations</u> related to private security services not provided.
6VAC20-171-230.26		Business standards of conduct.	<b>Strike</b> language that limits the type of material that is prohibited to be published.  26. Not publish or cause to be published any <del>written business</del> material relating to private security services that contains an assertion, representation, or statement of fact that is false, deceptive or misleading.
6VAC20-171-230.27		Business standards of conduct.	<b>Insert</b> <u>or otherwise prohibited under federal law.</u> Current verbiage implies that use of "pretext" is otherwise legal, when it can be illegal under certain circumstances, and specifically under several federal laws.  27. Not conduct private security business under a fictitious or assumed name unless the name is on file with the Department of Criminal Justice Services. This does not apply to a private investigator conducting a "pretext," provided that the private investigator does not state that he is representing a private security business that does not exist <u>or otherwise prohibited under federal law.</u>
6VAC20-171-230.	28	Business standards of conduct.	<b>Insert</b> provision to prevent undisclosed persons who may not have submitted for a criminal history check or are otherwise ineligible to provide private security services.  <u>28. Not act as or be an ostensible licensee for undisclosed persons who do or will control directly or indirectly the operations of the licensee's business.</u>

6VAC20-171-230.	29	Business standards of conduct.	<p><b>Insert</b> provision to reduce the impediment of active investigations for noncompliance or violations of the Code and Regulations.</p> <p><u>29. Not provide false or misleading information to representatives of the department.</u></p>
6VAC20-171-230.	30	Business standards of conduct.	<p><b>Insert</b> provisions to reduce the impediment of active investigations for noncompliance or violations of the Code and Regulations.</p> <p><u>30. Not provide materially incorrect, misleading, incomplete or untrue information on any email, application, or any other document filed with the department.</u></p>
6VAC20-171-240.2		Compliance agent <u>administrative requirements and standards of conduct</u>	<p><b>Insert</b> the requirement that compliance agents provide an email address to the department. This is an attempt to move towards a paperless system.</p> <p>2. Maintain at all times with the department his mailing address <u>and email address if applicable</u>. Written notification of any change of address shall be <del>in writing</del> and received by the department no later than 10 days after the effective date of the change.</p>
6VAC20-171-240. 6		Compliance agent <u>administrative requirements and standards of conduct</u>	<p><b>Insert</b> language to limit the reporting of convictions to those that could result in the ineligibility of a licensure/registration or certification pursuant to the Code.</p> <p>6. Inform the department, and the licensee for which the individual is designated as compliance agent if applicable, in writing within 10 days after pleading guilty or nolo contendere or being convicted or found guilty of any felony or of a misdemeanor <u>as outlined in §9.1-139 (K) of the Code of Virginia.</u></p>
6VAC20-171-240.10d		Compliance agent administrative requirements and standards of conduct	<p><b>Strike</b> the language “or certification”. This language is obsolete in regard to a photo id card and add temporary registration information.</p> <p>10. d. Ensure that all regulated employees carry <del>a state the department issued photo identification card unless the card is one in the same along with their registration or certification card, or temporary registration letter along with a photo ID while on duty.</del></p>
6VAC20-171-240.10	e	Compliance agent administrative requirements and standards of conduct	<p><b>Insert</b> the language for individuals who provide private security services prior to obtaining a valid registration.</p> <p>10. e. <u>Ensure that all regulated employees authorized to provide private security services while completing compulsory minimum training standards pursuant to §9.1-139 (H) of the code of Virginia carry a photo ID along with an authorization form provided by the Department while on duty.</u></p>

6VAC20-171-240.14		Compliance agent administrative requirements and standards of conduct	<p><b>Insert</b> the requirement that binding arbitrations are also satisfied in order to protect the general public utilizing private security services</p> <p>14. Satisfy all judgments <u>to include binding arbitrations</u> related to private security services not provided.</p>
6VAC20-171-240.15		Compliance agent administrative requirements and standards of conduct	<p><b>Strike</b> language that limits the type of material that is prohibited to be published.</p> <p>15. Not publish or cause to be published any <del>written business</del> material relating to private security services that contain an assertion, representation, or statement of fact that is false, deceptive or misleading.</p>
6VAC20-171-240.16		Compliance agent <u>administrative requirements and standards of conduct</u>	<p><b>Insert</b> <u>or otherwise prohibited under federal law.</u> Current verbiage implies that use of “pretext” is otherwise legal, when it can be illegal under certain circumstances, and specifically under several federal laws.</p> <p>16. Not conduct private security business under a fictitious or assumed name unless the name is on file with the Department of Criminal Justice Services. This does not apply to a private investigator conducting a "pretext," provided that the private investigator does not state that he is representing a private security business that does not exist <u>or otherwise prohibited under federal law.</u></p>
6VAC20-171-240.	17	Compliance agent administrative requirements and standards of conduct	<p><b>Insert</b> provision, this standard of conduct is required of all other regulated persons and was inadvertently left out for compliance agents.</p> <p>17. <u>Not violate any state or local ordinances related to private security services.</u></p>
6VAC20-171-240.	18	Compliance agent administrative requirements and standards of conduct	<p><b>Insert</b> provisions to reduce the impediment of active investigations for noncompliance or violations of the Code and Regulations.</p> <p>18. <u>Not provide false or misleading information to representatives of the department.</u></p>
6VAC20-171-240.	19-20	Compliance agent <u>administrative requirements and standards of conduct</u>	<p><b>Insert</b> provisions for purposes of security of information, compliance agents have enhanced access to the department’s licensing system that enables them to view information on the business employees.</p> <p>19. <u>Not use access to the department’s database information for any other purpose then verifying employee’s application status.</u></p> <p>20. <u>Not allow another to use access granted to the department’s database for any purpose.</u></p>

6VAC20-171-240.	21	Compliance agent <u>administrative requirements and standards of conduct</u>	<p><b>Insert</b> provision to reduce the impediment of active investigations for noncompliance or violations of the Code and Regulations.</p> <p><u>21. Not provide materially incorrect, misleading, incomplete or untrue information on any email, application or any other document filed with the department.</u></p>
6VAC20-171-245.		General Requirement s	<p><b>Repeal</b> Section – addressed all general requirements under 6VAC20-171-215  <del>All training schools are required to maintain administrative requirements and standards of conduct as determined by the Code of Virginia, department guidelines and this chapter.</del></p>
6VAC20-171-250.1		<u>Training school administrative requirements.</u>	<p><b>Insert</b> the requirement that schools provide an email address to the department. This is an attempt to move towards a paperless system.</p> <p>1. Maintain at all times with the department its physical <del>location in Virginia where records required to be maintained by the Code of Virginia and this chapter are kept and available for inspection by the department.</del> address and email address if applicable. A post office box is not a physical location address. <u>Such notification Notification of any change shall be in writing and received by the department no later than 10 days after the effective date of the change.</u></p>
6VAC20-171-250.2		Training school administrative requirements	<p><b>Insert</b> the word school after the word training</p> <p>Assistant training <u>school</u> director..</p>
6VAC20-171-250.7		Training school administrative requirements.	<p><b>Amend</b> provision to reflect changes made in the section addressing reinstatement under 6VAC20-181B. Requiring an entity to resubmit for an initial credential causes an undue hardship and the department will handle lapses in insurance through disciplinary measures.</p> <p>7. Maintain at all times current liability coverage at least in the minimum amounts prescribed by the application requirements of this chapter. <del>Failure of the training school to do so shall result in the certification training school becoming null and void. Each day of uninsured activity would be construed as an individual violation of this requirement.</del></p>
6VAC20-171-250.8		Training school administrative requirements.	<p><b>Insert</b> language to limit the reporting of convictions to those that could result in the ineligibility of a licensure/registration or certification pursuant to the Code.</p> <p>8. Inform the department in writing within 10 days, for any principal, partner, officer, instructor or employee regulated or required to be regulated by this chapter pleading guilty or nolo contendere or being convicted or found guilty of any felony or of a misdemeanor <u>as outlined in §9.1-139</u></p>

			<u>(K) of the Code of Virginia.</u>
6VAC20-171-250.11		Training school administrative requirements.	<p><b>Insert</b> language to include fictitious names. It is a requirement that a school file fictitious names with the department and this language was inadvertently left out of administrative requirements.</p> <p>11. Maintain at all times with the department its current operating name <u>and fictitious names</u>. Any name change reports shall be submitted in writing within 10 days after the occurrence of such change and accompanied by certified true copies of the documents that establish the name change.</p>
6VAC20-171-250.21		Training school administrative requirements.	<p><b>Amend</b> for clarity and grammatical purpose</p> <p>21. On a form provided by the department and within 10 calendar days of <del>the</del><u>an</u> incident, submit a report of any incident in which any instructor, student or employee has discharged a firearm while on duty, excluding any training exercise.</p>
6VAC20-171-250.	23	Training school administrative requirements.	<p>Insert provision to ensure that a business does not continue to utilize a person not qualified to carry a firearm and also allows for the Department to follow up to ensure compliance.</p> <p><u>23. Inform the department and compliance agent of the employing business if applicable, in a format prescribed by the department within seven days of any person regulated under this chapter who fails to requalify with a minimum passing score on the range.</u></p>
6VAC20-171-260.5		Training school standards of conduct.	<p><b>Insert</b> <u>electronic images</u> in order to stay abreast of evolving technology and initiatives to create a paperless process.</p> <p>5. Permit the department during regular business hours to inspect, review, or copy those documents, <u>electronic images</u>, business records or training records that are required to be maintained by the Code of Virginia and this chapter.</p>
6VAC20-171-260.11		Training school standards of conduct.	<p><b>Amend</b> language to restrict schools from assisting others in receiving a credential through fraud or misrepresentation.</p> <p>11. Not obtain <u>or aid and abet others to obtain</u> a license, license renewal, registration, registration renewal, certification or certification renewal through any fraud or misrepresentation.</p>
6VAC20-171-260.12		Training school standards of conduct.	<p><b>Insert</b> language <u>unless otherwise authorized by the department</u> to allow for a combination of entry-level training and in-service training under certain circumstances.</p>

6VAC20-171-260.18		Training school standards of conduct.	<b>Insert</b> <u>of the Commonwealth</u> after the word subdivision.
6VAC20-171-260.22		Training school standards of conduct.	<b>Amend</b> to specify what is in the Department's purview.  22. Not violate any state or local ordinances <u>related to private security services.</u>
6VAC20-171-260.23		Training school standards of conduct.	<b>Insert</b> the requirement that binding arbitrations are also satisfied in order to protect the general public utilizing private security services  23. Satisfy all judgments <u>to include binding arbitrations</u> related to private security services not provided.
6VAC20-171-260.24		Training school standards of conduct.	<b>Strike</b> language that limits the type of material that is prohibited to be published.  24. Not publish or cause to be published any <del>written business</del> material relating to private security services that contains an assertion, representation, or statement of fact that is false, deceptive or misleading.
6VAC20-171-260.	25	Training school standards of conduct.	<b>Insert</b> provision to reduce the impediment of active investigations for noncompliance or violations of the Code and Regulations.  <u>25. Not provide false or misleading information to representatives of the department.</u>  :
6VAC20-171-260.	26	Training school standards of conduct.	<b>Insert</b> provision to prevent undisclosed persons who may not have submitted for a criminal history check or are otherwise ineligible to provide private security services.  <u>26. Not act as or be an ostensible certified training school for undisclosed persons who do or will control directly or indirectly, the operations of the training school.</u>
6VAC20-171-260.	27	Training school standards of conduct.	<b>Insert</b> provision to reduce the impediment of active investigations for noncompliance or violations of the Code and Regulations.  <u>27. Not provide materially incorrect, misleading, incomplete or untrue information on any email, application, or any other document filed with the department.</u>
6VAC20-171-270.8		Training school director administrative requirements	<b>Amend</b> to specify what is in the Department's purview.  8. Not violate any state or local ordinances <u>relating to private security services.</u>

		and standards of conduct	
6VAC20-171-270.9		Training school director administrative requirements and standards of conduct	<p><b>Insert</b> the requirement that binding arbitrations are also satisfied in order to protect the general public utilizing private security services</p> <p>9. Satisfy all judgments <u>to include binding arbitrations</u> relating to private security services not provided.</p>
6VAC20-171-270.10		Training school director administrative requirements and standards of conduct	<p><b>Strike</b> language that limits the type of material that is prohibited to be published.</p> <p>10. Not publish or cause to be published any <del>written business</del> material relating to private security services that contains an assertion, representation, or statement of fact that is false, deceptive or misleading.</p>
6VAC20-171-270.	11-12	Training school director administrative requirements and standards of conduct	<p><b>Insert</b> provisions for purposes of security of information, training school directors have enhanced access to the department’s licensing system that enables them to view information on the trainees as well as submit authorized records to the department.</p> <p><u>11. Use access to the department’s database information only for the purpose of verifying employed instructors’ or students’ application status.</u></p> <p><u>12. Not allow another to use access granted to the department’s database for any purpose.</u></p>
6VAC20-171-270.	13	Training school director administrative requirements and standards of conduct	<p><b>Insert</b> provision to ensure that a business does not continue to utilize a person not qualified to carry a firearm and also allows for the Department to follow up to ensure compliance.</p> <p><u>13. Inform the department and compliance agent of the employing business if applicable, in a format prescribed by the department within seven days of any person regulated under this chapter who fails to requalify with a minimum passing score on the range.</u></p>
6VAC20-171-280. 2		Private security services instructor administrative requirements and standards of conduct.	<p><b>Insert</b> the requirement that instructors provide an email address to the department. This is an attempt to move towards a paperless system.</p> <p>2. Maintain at all times with the department his mailing address and email address if applicable. Written notification of any address change shall be in writing and received by the department no later than 10 days after the effective date of the change.</p>
6VAC20-171-280. 4		Private security	<p><b>Insert</b> language to limit the reporting of convictions to those that could result in the ineligibility of a</p>

		services instructor administrative requirements and standards of conduct.	<p>licensure/registration or certification pursuant to the Code.</p> <p>4. Inform the department, and the training school for which the individual is designated as an instructor if applicable, in writing within 10 days after pleading guilty or nolo contendere or being convicted or found guilty of any felony or of a misdemeanor <u>as outlined in §9.1-139 (K) of the Code of Virginia.</u></p>
6VAC20-171-280.14		Private security services instructor administrative requirements and standards of conduct.	<p><b>Amend</b> to specify what is in the Department’s purview.</p> <p>14. Not violate any state or local ordinances <u>relating to private security services.</u></p>
6VAC20-171-280.15		Private security services instructor administrative requirements and standards of conduct.	<p>Insert provision that instructors obtain continuing education in their area of certification once every two years or certification period.</p> <p><u>15. Maintain documentation of successful completion of a minimum of 2 hours of professional development for topics related to each category of instructor certification as established in 6VAC20-171-100 B.6 during each certification period; or successful completion of compulsory in-service training by another private security services certified instructor if also registered in the same categories.</u></p>
6VAC20-171-280.	16	Private security services instructor administrative requirements and standards of conduct.	<p><b>Insert</b> provision to be consistent with other regulated individuals standards of conduct.</p> <p><u>16. Not publish or cause to be published any material relating to Private Security Services which contain an assertion, representation, or statement of fact that is false, deceptive or misleading.</u></p>
6VAC20-171-280.	17-18	Private security services instructor administrative requirements and standards of conduct.	<p><b>Insert</b> provision to reduce the impediment of active investigations for noncompliance or violations of the Code and Regulations.</p> <p><u>17. Not provide false or misleading or misleading information to representatives of the department.</u></p> <p><u>18. Not provide materially incorrect, misleading, incomplete or untrue information on any email, application or any other document filed with the department.</u></p>
6VAC20-171-280.	19	Private security services	<p><b>Insert</b> provision to include firearms instructors for the purpose of safety, health and welfare of students. Armed registrants are also held to this standard of conduct.</p>



		instructor administrative requirements and standards of conduct.	<u>19. Transport, carry and utilize firearms while on duty only in a manner that does not endanger the public health, safety and welfare.</u>
6VAC20-171-280.	20	Private security services instructor administrative requirements and standards of conduct.	<b>Insert</b> provision to ensure that the training school director is informed and able to report the incident to the business and the department. This will allow the business to discontinue to utilize a person not qualified to carry a firearm and also allows for the Department to follow up to ensure compliance.  <u>20. Report in writing to the training school director within 24 hours of any person regulated under this chapter who fails to re-qualify with a minimum passing score on the range.</u>
6VAC20-171-280.	21	Private security services instructor administrative requirements and standards of conduct.	<b>Insert</b> provision to ensure that an individual is properly noticed and does not continue to utilize a firearm that he is not qualified to carry.  <u>21. Provide any person who fails to requalify with a minimum passing score on the range with a failure to re-qualify notice provided by the department.</u>
6VAC20-171-290.	A3	Instructor Alternatives	<b>Insert</b> subsection to clarify the policy utilized by the department and is consistent with the period of time instructor certifications are issued.  <u>A. 3. The department may issue a written authorization for a period not to exceed 24 months.</u>
6VAC20-171-300. B	3	Private security services training session.	<b>Insert</b> provision under administrative requirements to ensure schools submit new training courses for approval during school certification period.  <u>3. Course outline and training objectives must be approved by the department prior to offering a course of instruction for enrollment.</u>
6VAC20-171-300. B3	4	Private security services training session.	<b>Insert</b> language that details the information a school will be required to capture on a training completion form, this information will be needed as the department moves towards a web-based licensing system.  <u>.34. On a form provided by the department, the The training school director shall issue an original training completion form provided by the department and training certificate to each student who satisfactorily completes a training session no later than five business days following the training completion date.</u>
6VAC20-171-300. B4	5	Private security	<b>Amend</b> <u>4.5.</u> In a manner approved by the department, the training

		services training session.	school director shall submit an original training completion roster to the department affirming each student's successful completion of the session. The training completion roster shall be received by the department within seven calendar days, or postmarked if mailed, no later than five business days following the training completion date. <del>The training completion roster for each session must be</del> <u>and</u> accompanied by the applicable, nonrefundable processing fee.
6VAC20-171-300. B5	6	Private security services training session.	<b>Delete</b> reference to compliance agents. All requirements for compliance agents are established under 6VAC20-171-(70-72.) This section should only address the training provided for registered personnel. In addition, insert language referencing practical exercises that require grading.  5.6. A written examination shall be administered at the conclusion of each entry level training session. The examination shall be based on the applicable learning objectives. The student must attain a minimum grade of <del>80% for compliance agent entry level training or 70% for all other</del> entry-level training examinations <u>and pass any applicable practical exercises</u> , to satisfactorily complete the training session.
6VAC20-171-300. B8	9	Private security services training session.	<b>Insert</b> language to decipher between the entry-level and advanced firearms range training.  8.9. To successfully complete the <u>handgun or shotgun</u> firearms range training, the individual must achieve a minimum qualification score of 75% of the scoring value of the target.
6VAC20-171-300. B9-11		Private security services training session.	<b>Delete</b> language, this language is no longer needed due to amendments to the regulations this information has been placed in other areas of the regulations to ensure clear concise requirements.  <del>9. To successfully complete the private investigator entry level training session, the individual must: a. Successfully complete each of the four graded practical exercises required; and b. Pass the written examination with a minimum score of 70%.</del> <del>10. To successfully complete the personal protection specialist entry level training session, the individual must: a. Complete each of the five graded practical exercises required under protective detail operations pursuant to 6VAC20-171-350 E 6 (the practical exercises must be successfully completed prior to the written examination); and b. Pass the written examination with a minimum score of 70%.</del> <del>11. The unarmed security officer must: a. Complete the required training; and</del>

			<p><del>b. Successfully pass the written examination with a minimum score of 70%.</del></p>
6VAC20-171-300. B	10	Private security services training session.	<p><b>Insert</b> provision under the training session referencing the qualification score requirements for advanced firearms. This information was inadvertently left out and should be included in this section for clarity of all training session requirements.</p> <p><u>10. To successfully complete the advanced firearms range training, the individual must achieve a minimum qualification score of 92% of the scoring value of the target.</u></p>
6VAC20-171-300B	11	Private security services training session.	<p><b>Insert</b> new requirement for patrol rifle training</p> <p><u>11. To successfully complete the patrol rifle firearms range training, the individual must achieve a minimum qualification score of 85% of the scoring value of the target</u></p>
6VAC20-171-300. C2		Private security services training session.	<p><b>Delete</b> the make-up training may be completed at the next available session offered by the training school, training should be completed timely and 60 days is ample time to make up tardiness and absenteeism to ensure the student is getting the best possible instruction.</p> <p>C. Attendance. 2. Tardiness and absenteeism will not be permitted. Individuals violating these provisions will be required to make up any training missed. <del>Such</del> <u>All</u> training must be completed within <del>60 days after the completion of the training session or at the next available session offered by the training school</del> <u>the 12 months prior to application of a registration or certification.</u> Individuals not completing the required training within this period are required to complete the entire training session.</p>
6VAC20-171-300. C3		Private security services training session.	<p><b>Amend</b> language for clarity and in preparation of the new web-based licensing database and training reporting requirements.</p> <p>3. Individuals <del>that</del> <u>who</u> do not successfully complete the compulsory minimum training standards of the training session shall not be <del>reported to the department except where required pursuant to this chapter</del> <u>issued a training completion form or training certificate.</u></p>
6VAC20-171-300D2		Private security services training session.	<p><b>Insert</b> language that will require an instructor to be present during all periods of instruction, this eliminate instructors from conducting training sessions utilizing videos and leaving the classroom which reduces the time students receive continued instruction.</p> <p>D. Standards of conduct. 2. Training sessions will be conducted by certified instructors or other individuals authorized to provide instruction pursuant to this chapter <u>and they must be</u></p>

			<u>present for all periods of instruction unless otherwise authorized by the department.</u>
6VAC20-171-300D5		Private security services training session.	<b>Amend</b> language, replacing may with the word shall.  5. Training sessions <del>may</del> <u>shall</u> not exceed nine hours of classroom instruction per day. Range qualification and practical exercises shall not be considered classroom instruction; however, total training, including the maximum allotment of nine hours classroom instruction and applicable range qualification and practical exercises, shall not exceed 12 hours per day. This does not include time allotted for breaks, meals and testing.
6VAC20-171-300.D	11	Private security services training session.	<b>Insert</b> provision to limit regulatory training for registrants to a maximum of one hour during job related in-service training. <u>11. Certifiable in-service training may include a maximum of one hour of instruction dedicated to the review of regulations unless otherwise authorized by the department.</u>
6VAC20-171-300.D	12	Private security services training session.	<b>Insert</b> provision to prohibit live ammunition in the classroom to prevent discharges in classrooms that could have been prevented, the use of live ammunition must be limited to a secure range facility only.;  <u>12. There will be no live ammunition permitted in the classroom.</u>
6VAC20-171-305.	<u>On-line In-Service Training Programs</u>		<b>Delete</b> previous language that is not needed and replace section with requirements for Online In-Service Training Programs.  <del>Article 3 Private Security Services Registered Personnel General Requirements All registered personnel are required to maintain administrative requirements and standards of conduct as determined by the Code of Virginia, department guidelines and this chapter.</del>
6VAC20-171-305.	1-10	Online In-Service Training Programs	<b>Insert</b> entire section addressing online training sessions, the requirements are consistent to those established for classroom training sessions. This allows the department and industry to move forward with evolving technology and will assist in reducing time and expense to regulated individuals as they meet their in-service training requirements.  <u>On-line training programs may only be offered for compulsory minimum in-service training requirements. On-line training programs shall meet the following requirements:</u> <u>1. All on-line schools shall maintain a private security services training school certification in good standing and meet all of the administrative requirements and standards</u>

			<p><u>of conduct specified in this chapter.</u></p> <p><u>2. All current on-line training material to include complete course content and performance objectives of mandated compulsory training requirements must be approved by the department prior to offering a course of instruction for enrollment.</u></p> <p><u>3. Students enrolled in an on-line training program shall successfully complete all course material within 30 days of the first log-on to the training school website or prior to the registration or certification expiration date or final reinstatement date, whichever comes first.</u></p> <p><u>4. Training schools offering on-line courses that accept credit card payments shall subscribe to an e-commerce solution service to protect the security and integrity of the monetary transaction.</u></p> <p><u>5. The training software programs used by a certified training school shall allow the department auditing access to the training system. Such auditing access shall be available 24 hours a day, seven days a week.</u></p> <p><u>6. The training software program shall be capable of generating a unique electronic notification of training completion for each student completing the course requirements and each course of instruction on a 24-hour a day basis.</u></p> <p><u>7. The training of completion shall include the following:</u></p> <ul style="list-style-type: none"> <li><u>a. A unique training completion number;</u></li> <li><u>b. The name, a unique identification number, and address of the individual;</u></li> <li><u>c. The name of the particular course that the individual completed;</u></li> <li><u>d. Dates of course completion/test passage;</u></li> <li><u>e. Name, address, telephone number, and license number of the training school; and</u></li> <li><u>f. Name, signature, and DCJS identification number of the school director and primary instructor.</u></li> </ul> <p><u>8. The training software program shall be capable of generating a training certificate for each student and each course of instruction that can be printed by the student's computer and printer. This training certificate shall only be made available to the student upon successful completion of all course material.</u></p> <p><u>9. The training software program shall be capable of capturing and archiving student information for a period of not less than three years.</u></p> <p><u>10. Training schools offering on-line training courses will designate one individual as the network administrator for that school's network server. The network administrator will be the technical contact between the department and the training school. Upon termination of the services of the designated network administrator, a new administrator shall be designated and notification made to the department within 10 days after effective date of the</u></p>
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<p><u>6VAC20-171-308.</u></p>	<p>A (1-10) B(1-12)</p>	<p><u>Detector Canine Handler Examiners administrative requirements and standards of conduct.</u></p>	<p><b>Insert</b> entire section of administrative requirements and standards of conduct for Detector Canine Handler examiners, pursuant to the authority granted under 9.1-138 et seq. The Department met with an ad hoc committee and members of the industry to establish the regulatory requirements for the Detector Canine Handler Examiners. The administrative requirements and standards of conduct are also consistent with all other regulated individuals within the regulations.</p> <p><b><u>6VAC20-171-308. Detector canine handler examiners administrative requirements and standards of conduct.</u></b></p> <p>A. Administrative requirements. An examiner shall:</p> <ol style="list-style-type: none"> <li>1. <u>Maintain at all times with the department his mailing address and email address if applicable. Written notification of any address change shall be in writing and received by the department no later than 10 days after the effective date of the change.</u></li> <li>2. <u>Inform the department, and the business or training school for which the individual is employed, if applicable, in writing within 10 days after pleading guilty or nolo contendere, and after being convicted or found guilty of any felony or of a misdemeanor as outlined in § 9.1-139 K of the Code of Virginia.</u></li> <li>3. <u>Inform the department, and the licensed business or training school for which the individual is employed or utilized, in writing within 10 days after having been found guilty by any court or administrative body of competent jurisdiction to have violated the private security services business statutes or regulations of that jurisdiction, there being no appeal therefrom or the time for appeal having elapsed.</u></li> <li>4. <u>Satisfy all judgments to include binding arbitrations related to private security services not provided.</u></li> <li>5. <u>Notify the department within 10 calendar days following termination of his employment as an examiner for a business or training school.</u></li> <li>6. <u>Conduct examinations pursuant to the requirements established by the department.</u></li> <li>7. <u>Notify the department within 10 calendar days following termination of any certification as a detector canine handler examiner or equivalent with any national organization, unit of the United States military, or other formal entity involved with certifying, training or setting standards for detection canines.</u></li> <li>8. <u>Notify the department in writing within 10 calendar days of determining that a detector canine handler or detector canine fails to successfully complete the certification examination.</u></li> </ol>

			<p><u>9. Maintain documentation and a photograph of the examined detector canine team for three years for all examinations conducted that verifies compliance with requirements pursuant to the Code of Virginia and this chapter.</u></p> <p><u>10. Utilize only department-approved certification examinations for the testing and certification of detector canine teams.</u></p> <p>B. Standards of conduct. An examiner shall:</p> <p><u>1. Conform to all requirements pursuant to the Code of Virginia and this chapter.</u></p> <p><u>2. Not have been convicted or found guilty in any jurisdiction of the United States of any felony or a misdemeanor involving moral turpitude, assault and battery, damage to real or personal property, controlled substances or imitation controlled substances as defined in Article 1 (§ 18.2-247 et seq.) of Chapter 7 of Title 18.2 of the Code of Virginia, prohibited sexual behavior as described in Article 7 (§ 18.2-61 et seq.) of Chapter 4 of Title 18.2 of the Code of Virginia, or firearms, from which no appeal is pending, the time for appeal having elapsed. Any plea of nolo contendere shall be considered a conviction for the purpose of this chapter. The record of conviction certified or authenticated in such form as to be admissible in evidence under the laws of the jurisdiction where convicted shall be prima facie evidence of such guilt.</u></p> <p><u>3. Not violate or aid and abet others in violating the provisions of Article 4 (§ 9.1-138 et seq.) of Chapter 1 of Title 9.1 of the Code of Virginia or this chapter.</u></p> <p><u>4. Not commit any act or omission that results in a private security license, registration, or certification being suspended, revoked, not renewed or being otherwise disciplined in any jurisdiction.</u></p> <p><u>5. Not obtain a license, license renewal, registration, registration renewal, certification, or certification renewal through any fraud or misrepresentation.</u></p> <p><u>6. Not engage in acts of unprofessional conduct in the practice of private security services.</u></p> <p><u>7. Not engage in acts of negligent or incompetent private security services.</u></p> <p><u>8. Not make any misrepresentation or false promise to a private security services business client or potential private security services business client.</u></p> <p><u>9. Not violate any state or local ordinances relating to private security services.</u></p> <p><u>10. Not publish or cause to be published any material relating to private security services that contain an assertion, representation, or statement of fact that is false, deceptive, or misleading.</u></p> <p><u>11. Not provide false or misleading information to representatives of the department.</u></p>
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6VAC20-171-310.3		Registered personnel administrative requirements.	<p><b>Insert</b> language to limit the reporting of convictions to those that could result in the ineligibility of a licensure/registration or certification pursuant to the Code.</p> <p>3. Inform the department, and the business for which the individual is employed if applicable, in writing within 10 days after pleading guilty or nolo contendere or being convicted or found guilty of any felony or of a misdemeanor <u>as outlined in §9.1-139 (K) of the Code of Virginia.</u></p>
6VAC20-171-320.7		Registered personnel standards of conduct	<p><b>Insert</b> proper terminology as well as include the categories of registration that are eligible to be employed for 90 days pursuant to §9.1-139(H)</p> <p>7. Carry a valid registration <u>card</u> or valid temporary <del>authorization</del> <u>registration</u> letter at all times while on duty. Individuals requiring registration as <u>an unarmed security officer</u>, an alarm respondent, <u>a locksmith</u>, a central station dispatcher, an electronic security sales representative or an electronic security technician may be employed for not more than 90 consecutive days in any category listed above while completing the compulsory minimum training standards and may not be employed in excess of 120 days without having been issued a registration or an exception from the department <u>and must carry a photo ID and authorization from their employer on a form provided by the Department at all times while on duty.</u></p>
6VAC20-171-320.8		Registered personnel standards of conduct	<p><b>Insert</b> proper terminology.</p> <p>8. Carry the private security state issued photo <u>registration</u> identification card at all times while on duty once the authorization has been approved from the department, except those individuals operating outside the Commonwealth of Virginia who shall obtain the state issued photo identification card prior to providing services when physically located in the Commonwealth.</p>
6VAC20-171-320.10		Registered personnel standards of conduct	<p><b>Insert</b> language that requires written authority by the business for regulated armed employees to utilize a patrol rifle.</p> <p>10. Possess a valid firearms training endorsement if he carries or has access to firearms while on duty and then only those firearms by type of action and caliber to which he has been trained on and is qualified to carry. <u>Carry or have access to a patrol rifle while on duty only with the expressed written authorization of the licensed private security services business employing the registrant.</u></p>



<p>6VAC20-171-320.11</p>		<p>Registered personnel standards of conduct</p>	<p><b>Insert</b> the requirement that the authorization to carry concealed while on the job is documented by the private security services business.</p> <p>11. Carry a firearm concealed while on duty only with the expressed <u>written</u> authorization of the licensed private security services business employing the registrant and only in compliance with § 18.2-308 of the Code of Virginia.</p>
<p>6VAC20-171-320.14</p>		<p>Registered personnel standards of conduct</p>	<p><b>Amend</b> language for clarity.</p> <p>14. Engage in no conduct which <u>shall mislead or misrepresent</u> through word, deed or appearance <del>suggests</del> that a registrant is a law-enforcement officer, or other government official.</p>
<p>6VAC20-171-320.15</p>		<p>Registered personnel standards of conduct</p>	<p><b>Amend to read:</b></p> <p>15. Display one's <u>photo identification</u> registration or <u>temporary registration along with a photo ID</u> while on duty in response to the request of a law-enforcement officer, department personnel or client. <u>Individuals providing private security services as authorized pursuant to paragraph 7 of this section who have not received their registration must display a state issued photo identification and authorization letter while on duty in response to request of a law-enforcement officer, department personnel or client.</u></p>
<p>6VAC20-171-320.17</p>		<p>Registered personnel standards of conduct</p>	<p><b>Delete obsolete language.</b></p> <p>17. b. Include no patch or other writing (i) containing the word "police" or any other word suggesting a law-enforcement officer; (ii) containing the word "officer" unless used in conjunction with the word "security"; or (iii) resembling any uniform patch or insignia of any duly constituted law-enforcement agency of this Commonwealth, its political subdivisions or of the federal government. <del>This restriction shall not apply to individuals who are also duly sworn special police officers, to the extent that they may display words that accurately represent that distinction.</del></p>
<p>6VAC20-171-320.18</p>		<p>Registered personnel standards of conduct</p>	<p><b>Amend</b> to ensure consistency with Business requirements: alarm verification</p> <p>18. When providing <u>central station monitoring services as a central station dispatcher</u>, attempt to verify the legitimacy of a burglar alarm activation by <del>contacting an authorized individual at the site where an alarm signal originated before dispatching authorities</del> <u>calling the site of the alarm. If unable to make contact, call one additional number provided by the alarm user who has the authority to cancel the dispatch.</u> This shall not apply if the alarm user has provided written authorization requesting immediate dispatch <u>or one call dispatch to both their local</u></p>

			<u>police department and their dealer of record</u> . This shall not apply to duress or hold-up alarms.
6VAC20-171-320.26		Registered personnel standards of conduct	<b>Insert</b> the requirement that binding arbitrations are also satisfied in order to protect the general public utilizing private security services  26. Satisfy all judgments <u>to include binding arbitrations</u> related to private security services not provided.
6VAC20-171-320.	27-28	Registered personnel standards of conduct	<b>Insert</b> provision to reduce the impediment of active investigations for noncompliance or violations of the Code and Regulations.  <u>27. Not provide false or misleading information to representatives of the department.</u> <u>28. Not provide materially incorrect, misleading, incomplete or untrue information on any email, application or any other document filed with the department.</u>
6VAC20-171-350.A		Entry level training.	<b>Insert</b> categories of registration pursuant to Virginia Code 9.1-138 et seq. In addition delete any reference to compliance agents. Compliance agent requirements have been relocated to Section 6 VAC20-171-70-72 for clarity.  A. Each person employed by a private security services business or applying to the department for registration as an unarmed security officer, armed security officer/courier, personal protection specialist, armored car personnel, security canine handler, <u>explosives detector canine handler, narcotics detector canine handler, private investigator, alarm respondent, locksmith, central station dispatcher, electronic security sales representative, electronic security technician, or electronic security technician's assistant as defined by § 9.1-138 of the Code of Virginia, or for certification as a compliance agent as required by § 9.1-139 of the Code of Virginia, who has not met the compulsory minimum training standards prior to July 13, 1994,</u> must meet the compulsory minimum training standards herein established, unless provided for otherwise in accordance with this chapter.
6VAC20-171-350.B		Entry level training.	<b>Delete</b> certification which is covered under the certification requirements. This section should reference entry-level training for registered personnel only. In addition, there is no way the Department can verify when a document is submitted, which requires the change to the word "received".  B. Training will be credited only if application for registration <del>or certification is submitted to</del> <u>received by</u> the department within 12 months of completion of training.
6VAC20-171-350.C		Entry level	The entry-level training has been restructured to include

		<p>training.</p>	<p>specific courses and hours for clarity. In addition, the minimum course and hour requirements for locksmiths and detector canine handlers have been added. The compulsory minimum training standards for armed security officers have increased from 40 hours to 50 hours due to an increase in firearms training hours and the hours for shotgun entry-level training have increased from 2 to 4 hours.</p> <p>C. <del>Hour</del> <u>Course and minimum hour</u> requirement. The compulsory minimum entry level training <u>courses and specific minimum</u> hour requirement by category, excluding examinations, practical exercises and range qualification, shall be:</p>
<p>6VAC20-171-350.C1-12</p>		<p>Entry level training.</p>	<p><b>Amend</b> entire section C to specify the training courses required of each registration category. This amendment includes the course code, hours and title of the mandated training, in addition, the training requirements have been inserted for detector canine handlers and locksmiths in accordance with the authority granted under 9.1-138 et seq.</p> <p>C. <del>Hour</del> <u>Course and minimum hour</u> requirement. The compulsory minimum entry level training <u>courses and specific minimum</u> hour requirement by category, excluding examinations, practical exercises and range qualification, shall be:</p> <ol style="list-style-type: none"> <li>1. Unarmed security officer —18 hours             <ol style="list-style-type: none"> <li>a. <u>01E: Security Officer Core Subjects – 18 hours</u></li> </ol> </li> <li>2. Armed security officer/courier —<del>40 hours</del> – <u>50 hours (53 hours including shotgun training)</u> <p><del>*There are 8 hours of Arrest Powers, Policies, Procedures that are included in the Armed Security Officer Training. These 8 hours are mandatory for armed security officers only.</del></p> <ol style="list-style-type: none"> <li>a. <u>01E: Security Officer Core Subjects – 18 hours</u></li> <li>b. <u>05E: Armed Security Officer Arrest Authority – 8 hours</u></li> <li>c. <u>75E: Security Officer Handgun – 24 hours</u></li> <li>d. <u>08E: Entry-level Shotgun – 3 hours (if applicable*) * To also have access to a shotgun while on duty, the additional shotgun course is required.</u></li> </ol> </li> <li>3. Armored car personnel —<del>26 hours</del> – <u>28 hours (31 hours with shotgun)</u> <ol style="list-style-type: none"> <li>a. <u>03E: Armored Car Procedures – 12 hours</u></li> <li>b. <u>07E: Entry-level Handgun – 16 hours</u></li> <li>c. <u>08E: Entry-level Shotgun – 3 hours (if applicable*) * To also have access to a shotgun while on duty, the additional shotgun course is required.</u></li> </ol> </li> <li>4. Security canine handler —30 hours (<u>excluding basic obedience training</u>)             <ol style="list-style-type: none"> <li>a. <u>01E: Security Officer Core Subjects – 18 hours</u></li> </ol> </li> </ol>

			<p><u>(prerequisite for 04ES)</u></p> <p><u>b. Prerequisite for 04ES – Basic Obedience Training</u></p> <p><u>c. 04ES: Security Canine Handler – 12 hours</u></p> <p>5. Private investigator —60 hours</p> <p><u>a. 02E: Private Investigator Subjects – 60 hours</u></p> <p>6. Personal protection specialist —60 hours</p> <p><u>a. 32E: Personal Protection Specialist –60 hours</u></p> <p><u>b. 07E Entry-level Handgun – 16 hours (prerequisite for 09E Advanced Handgun)</u></p> <p><u>c. 09E: Advanced Handgun – 14 hours (for armed personal protection specialists)</u></p> <p>7. Alarm respondent —18 hours</p> <p><u>a. 01E: Security Officer Core Subjects – 18 hours</u></p> <p>8. Central station dispatcher —8 hours</p> <p><u>a. 30E: Electronic Security Core Subjects –4 hours</u></p> <p><u>b. 38E: Central Station Dispatcher – 4 hours</u></p> <p>9. Electronic security sales representative —8 hours</p> <p><u>a. 30E: Electronic Security Core Subjects – 4 hours</u></p> <p><u>b. 39E: Electronic Security Sales – 4 hours</u></p> <p>10. Electronic security technician —14 hours</p> <p><u>a. 30E: Electronic Security Core Subjects – 4 hours</u></p> <p><u>b. 35E: Electronic Security Technician – 10 hours</u></p> <p>11. Electronic security technician's assistant —4 hours</p> <p><u>a. 30E: Electronic Security Core Subjects – 4 hours</u></p> <p><u>12. Detector Canine Handler – 160 hours (excluding certification examination)</u></p> <p><u>a. 04ED: Detector Canine Handler – 160 hours</u></p> <p><u>b. Certification exam by a Certified Detector Canine Handler Examiner</u></p> <p><u>13. Locksmith – 18 hours</u></p> <p><u>a. 25E: Locksmith – 18 hours</u></p>
<p>6VAC20-171-350.C12</p>		<p>Entry level training.</p>	<p><b>Strike</b> reference to compliance agents, this section has been amended to address training requirements for registered personnel only. Compliance agent requirements are outlined in 6VAC20-171-70 of this chapter.</p> <p><u>12. Compliance agent —6 hours</u></p>

<p>6VAC20-171-350.D1-12</p>	<p>D1-D14</p>	<p>Entry level training.</p>	<p>The course content has been <b>amended</b> to reflect changes to the content for armed security officer classroom training, and the hour requirements for each individual section of a course has been removed. The proposed regulations reflect the course content for locksmiths and detector canine handler examiners and all training provisions for compliance agents has been deleted and added to section 6 VAC 20-171-70-172. In addition, pursuant to the recommendation of the Secure Commonwealth Panel the Seven Signs of Terrorism topic has been included in the mandated entry-level training curriculum for private security personnel.</p> <p>D. Course content. The compulsory minimum entry level training course content by <del>category</del> <u>specific course</u>, excluding examinations, mandated practical exercises and range qualification, shall be as provided in this subsection.</p> <p>1. <u>Security officer core subjects. (01E) – 18 hours (excluding examination)</u></p> <p>The entry level curriculum for unarmed security officer, armed security officer/courier, security canine handler, and alarm respondent sets forth the following areas identified as:</p> <p>a. Orientation —2 hours</p> <p>(1) <del>Virginia law and regulations</del> <u>Applicable sections of the Code of Virginia and Regulations Relating to Private Security Services</u></p> <p>(2) Code of ethics</p> <p>(3) General duties and responsibilities</p> <p><u>(4) The Seven Signs of Terrorism</u></p> <p>b. Law —4 hours</p> <p>c. Security patrol, access control and communications —2 hours</p> <p>d. Documentation —4 hours</p> <p>e. Emergency procedures —4 hours</p> <p>f. Confrontation management —2 hours</p> <p><u>g. Use of force</u></p> <p><u>h. Written comprehensive examination</u></p> <p>Total hours (excluding exam) —18 hours</p> <p>2. <del>Armed security officer/courier</del> <u>Armed Security Officer Arrest Authority (05E) – 8 hours (excluding examination)</u></p> <p><u>a. Arrest powers, policies and procedures</u></p> <p><u>b. Written comprehensive examination</u></p> <p><del>a. Security officer core subjects —18 hours</del></p> <p><del>b. Entry level handgun training (refer to Article 2</del></p>
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			<p><del>(6VAC20-171-365 et seq.) of this part) —14 hours (includes dry fire, and judgmental shooting and low level light shooting familiarization)</del></p> <p><del>c. Arrest powers, policies, procedures —8 hours</del></p> <p><del>d. Entry level shotgun training, if applicable (refer to Article 2 (6VAC20-171-365 et seq.) of this part) —2 hours</del></p> <p><del>Total hours (excluding examinations, shotgun classroom instruction and range qualification) —40 hours</del></p> <p><u>3. Armored car personnel. (03E) – 12 hours (excluding examination)</u></p> <p><del>a. Administration and armored car orientation —1 hour</del></p> <p><u>(1) The Seven Signs of Terrorism</u></p> <p><del>b. Applicable sections of the Code of Virginia and DCJS regulations [Regulations Relating to Private Security Services] —1 hour</del></p> <p><del>c. Armored car procedures —10 hours</del></p> <p><del>d. Written comprehensive examination</del></p> <p><del>e. Entry level handgun training (refer to Article 2 (6VAC20-171-365 et seq.) of this part) —14 hours (includes 4 hours of range dry fire and low level lighting)</del></p> <p><del>f. Entry level shotgun training, if applicable (refer to Article 2 (6VAC20-171-365 et seq.) of this part) —2 hours</del></p> <p><del>Total hours (excluding examinations, shotgun classroom instruction and range qualification) —26 hours</del></p> <p><u>4. Security canine handler. (04ES) 12 hours (excluding examination and basic obedience training)</u></p> <p><u>a. Prerequisites for security canine handler entry level (official documentation required): Successful completion of basic obedience training.</u></p> <p><u>b. Demonstration of proficiency. The student must demonstrate his proficiency in the handling of a security canine to satisfy the minimum standards</u></p> <p><u>c. Evaluation by a certified private security canine handler instructor and basic obedience retraining</u></p> <p><u>d. Security canine handler orientation/legal authority</u></p> <p><u>e. Canine patrol techniques</u></p> <p><u>f. Written comprehensive examination</u></p> <p><del>Complete entry level training requirements pursuant to Article 3 (6VAC20-171-430 et seq.) of this part.</del></p> <p><u>5. Private investigator. (02E) –60 hours (excluding</u></p>
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			<p><u>examination and practical exercises)</u></p> <p><del>a. Orientation: applicable sections of the Code of Virginia; Administrative Code 6VAC20-171; standards of professional conduct; and ethics – 6 hours</del></p> <p><u>(1) Applicable sections of the Code of Virginia</u></p> <p><u>(2) Administrative Code 6VAC 20-171 et seq. Regulations Relating to Private Security Services</u></p> <p><u>(3) Standards of professional conduct</u></p> <p><u>(4) Ethics</u></p> <p><u>(5) The Seven Signs of Terrorism</u></p> <p><del>b. Law: basic law; legal procedures and due process; civil law; criminal law; evidence; and legal privacy requirements – 16 hours plus one practical exercise</del></p> <p><u>(1) Basic law</u></p> <p><u>(2) Legal procedures and due process</u></p> <p><u>(3) Criminal and Civil law</u></p> <p><u>(4) Evidence</u></p> <p><u>(5) Legal privacy requirements</u></p> <p><del>c. General investigative skills, tools and techniques: surveillance; research; and interviewing – 16 hours plus one practical exercise</del></p> <p><u>(1) Tools and techniques</u></p> <p><u>(2) Surveillance</u></p> <p><u>(3) Research</u></p> <p><u>(4) Interviewing</u></p> <p><del>d. Documentation: Report preparations; photography; audio recording; general communication; and courtroom testimony – 8 hours plus one practical exercise</del></p> <p><u>(1) Report preparations</u></p> <p><u>(2) Photography</u></p> <p><u>(3) Audio recording</u></p> <p><u>(4) General communication</u></p> <p><u>(5) Courtroom testimony</u></p> <p><del>e. Types of investigations: accident; insurance; background; domestic; undercover; fraud and financial; missing persons and property; and criminal – 14 hours plus one practical exercise</del></p> <p><u>(1) Accident</u></p> <p><u>(2) Insurance</u></p> <p><u>(3) Background</u></p> <p><u>(4) Domestic</u></p> <p><u>(5) Undercover</u></p>
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			<p><del>e. <u>b.</u> Overview of electronic security —1 hour</del></p> <p><del>d. <u>c.</u> False alarm prevention —1 hour</del></p> <p><del>e. <u>d.</u> Written <u>comprehensive</u> examination</del></p> <p><del>Total hours (excluding examination)—4 hours</del></p> <p><del>9.8. Central station dispatcher. (38E) — 4 hours (excluding examination)</del></p> <p><del>a. Electronic security subjects —4 hours</del></p> <p><del>b. <u>a.</u> Central station dispatcher subjects —4 hours</del></p> <p><del>(1) Duties and responsibilities</del></p> <p><del>(2) Communications skills</del></p> <p><del>(3) Emergency procedures</del></p> <p><del>e. <u>b.</u> Written <u>comprehensive</u> examination</del></p> <p><del>Total hours (excluding examination)—8 hours</del></p> <p><del>10.9. Electronic security sales representative. (39E) 4 hours (excluding examination)</del></p> <p><del>a. Electronic security subjects —4 hours</del></p> <p><del>b. <u>a.</u> Electronic security sales representative subjects —4 hours</del></p> <p><del>(1) Duties and responsibilities</del></p> <p><del>(2) System design/components</del></p> <p><del>(3) False alarm prevention</del></p> <p><del>e. <u>b.</u> Written <u>comprehensive</u> examination</del></p> <p><del>Total hours (excluding examination)—8 hours</del></p> <p><del>14.10. Electronic security technician. (35E) — 4 hours (excluding examination)</del></p> <p><del>a. Electronic security subjects —4 hours</del></p> <p><del>b. <u>a.</u> Electronic security technician subjects — 10 hours</del></p> <p><del>(1) Duties and responsibilities</del></p> <p><del>(2) Electronics</del></p> <p><del>(3) Control panels</del></p> <p><del>(4) Protection devices and application</del></p> <p><del>(5) Test equipment</del></p> <p><del>(6) Power and grounding</del></p> <p><del>(7) National electrical code</del></p> <p><del>(8) Job safety</del></p> <p><del>e. <u>b.</u> Written <u>comprehensive</u> examination</del></p> <p><del>Total hours (excluding examination)—14 hours</del></p> <p><del>12. Compliance agent.</del></p> <p><del>a. Industry overview and responsibilities</del></p> <p><del>b. Regulations review</del></p> <p><del>c. Business practices and ethical standards</del></p>
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			<p>d. <u>Records requirements and other related issues</u></p> <p>e. <u>Written examination</u></p> <p>Total hours (excluding written examination) — 6 hours</p> <p><u>11. Detector Canine Handler (04ED) – 160 hours to include practical exercises (excluding certification exam)</u></p> <p><u>a. Introduction/orientation/administration</u></p> <p><u>(1) Code of Ethics</u></p> <p><u>(2) General Duties and Responsibilities</u></p> <p><u>(3) Legal</u></p> <p><u>(4) Applicable sections of the Code of Virginia and Regulations Relating to Private Security Services</u></p> <p><u>(5) The Seven Signs of Terrorism</u></p> <p><u>b. Working Canines</u></p> <p><u>(1) Historical Perspective</u></p> <p><u>(2) Terms and Definitions</u></p> <p><u>(3) Methodology and Application</u></p> <p><u>(4) Training Documentation</u></p> <p><u>(5) Search Patterns</u></p> <p><u>c. Basic Canine Handling (including practical exercises)</u></p> <p><u>(1) Training</u></p> <p><u>(2) Care and Health</u></p> <p><u>(3) Emergency Medical Care</u></p> <p><u>d. Detector Canine Deployment</u></p> <p><u>Canine Behavior: Reading and Understanding</u></p> <p><u>e. Explosive or Narcotics Familiarization (including practical exercises)</u></p> <p><u>(1) Illegal Narcotics Familiarization</u></p> <p><u>(2) Explosives Substance and I.E.D. Familiarization</u></p> <p><u>(3) Safety</u></p> <p><u>f. Written comprehensive exam</u></p> <p><u>12. Locksmith (25E) – 18 hours (excluding examination)</u></p> <p><u>a. Code of Virginia and Regulations Relating to Private Security Services</u></p> <p><u>(1) The Seven Signs of Terrorism</u></p> <p><u>b. Orientation to Locksmithing</u></p> <p><u>(1) History of locksmithing</u></p> <p><u>(2) Ethics</u></p> <p><u>(3) Trade resources</u></p> <p><u>(4) Terminology</u></p>
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			<p><u>(5) Professional conduct</u></p> <p><u>(6) Job safety</u></p> <p><u>c. Public Safety Codes</u></p> <p><u>(1) NFPA (80, 101)</u></p> <p><u>(2) Overview of Authorities Having Jurisdiction (AHJs)</u></p> <p><u>(3) ADA</u></p> <p><u>(4) Terminology</u></p> <p><u>(5) Safety code resources</u></p> <p><u>d. Technical Applications</u></p> <p><u>(1). Terminology (to include definition/purpose/function)</u></p> <p><u>(2) Locks/types</u></p> <p><u>(3) Handing</u></p> <p><u>(4) Master keying</u></p> <p><u>(5) Key records and codes</u></p> <p><u>(6) Key blanks and keyways</u></p> <p><u>(7) Physical security</u></p> <p><u>(8) Types of client sites</u></p> <p><u>(9) Safes/vaults</u></p> <p><u>(10) Access control</u></p> <p><u>(11) Handling restricted keys</u></p> <p><u>(12) Door system components</u></p> <p><u>(13) Automotive</u></p> <p><u>e. Written comprehensive examination</u></p>
6VAC20-171-360.A		In-service training	<p>The <b>amendments</b> include in-service training requirements for locksmiths and detector canine handlers and combines the course content and minimum hour requirements within one section (Section B) thus eliminating the need for Section C.</p> <p>A. Each person registered with the department as an armed security officer/courier, personal protection specialist, armored car personnel, security canine handler, <u>narcotics detector canine handler; explosives detector canine handler, private investigator, alarm respondent, locksmith, central station dispatcher, electronic security sales representative, electronic security technician, unarmed security officer or electronic security technician's assistant, or certified by the department to act as a compliance agent</u> shall complete the compulsory in-service training standard once during each 24-month period of registration or certification.</p>
6VAC20-171-360.A1		In-service training	<p><b>Delete</b> the training requirements for compliance agents and instructors. This information is inserted into the</p>

			<p>sections addressing each individual certification and removed from this section which addresses in-service training for registered personnel.</p> <p><del>1. Compliance agent.</del>  <del>a. In-service training must be completed within 12 months immediately preceding the expiration date.</del>  <del>b. Individuals who fail to complete in-service training prior to the established expiration date may complete in-service training within 30 days after the expiration date if a completed in-service training enrollment application and a \$25 delinquent training fee is received by the department.</del>  <del>2. Instructor. All private security instructors must complete instructor in-service training within 12 months immediately preceding the individual's expiration date.</del></p>
<p>6VAC20-171-360.B</p>		<p>In-service training</p>	<p><b>Amend</b> language to combine the course content and minimum hour requirements within one section (Section B) thus eliminating the need for Section C.</p> <p><u>B. Course Content and minimum hour</u> <del>Hour</del> requirement. The compulsory minimum in-service training <u>content and minimum</u> hour requirement by category, excluding examinations, practical exercises and range qualification, shall be as follows:</p>
		<p>In-service training</p>	<p>These <b>amendments</b> include in-service training requirements for locksmiths and detector canine handlers and combines the course content and minimum hour requirements within one section (Section B) thus <u>eliminating the need for Section C</u>. These amendments also include the in-service training requirements for security canine handlers which were deleted from VAC20-171-430. The in-service training requirements for compliance agents and general instructors was deleted from this section and inserted in the sections addressing the individual certification requirements.</p> <p>1. Unarmed security officer: <u>(01I) Security Officer Core Subjects In-Service</u> – 4 hours  <u>Job-related training</u></p> <p>2. Armed security officer/courier <u>(01I) Security Officer Core Subjects In-Service</u> – 4 hours <u>(not including range retraining)</u>  <u>Job-related training</u></p> <p>3. Armored car personnel <u>(03I) Armored Car Personnel In-Service</u> – 4 hours <u>(not including range retraining)</u>  <u>Job-related training</u></p> <p>4. Security canine handler <u>(04IS) Security Canine Handler In-Service</u> – 8 hours  <u>a. Basic obedience evaluation and retraining</u>  <u>b. Canine grooming, feeding, and health care</u>  <u>c. Apprehension techniques</u></p>

			<p><u>d. Obedience</u></p> <p>5. Private investigator (02I) <u>Private Investigator In-Service – 8 hours</u></p> <p><u>Job-related training</u></p> <p>6. Personal protection specialist (32I) <u>Personal Protection Specialist In-Service – 8 hours (not including range retraining for armed)</u></p> <p><u>Job-related training</u></p> <p>7. Alarm respondent (01I) <u>Security Officer Core Subjects In-Service – 4 hours</u></p> <p><u>Job-related training</u></p> <p>8. Central station dispatcher (38I) <u>Central Station Dispatcher In-Service – 4 hours</u></p> <p><u>Job-related training</u></p> <p>9. Electronic security sales representative (39I) <u>Electronic Sales Representative In-Service – 4 hours</u></p> <p><u>Job-related training</u></p> <p>10. Electronic security technician (35I) <u>Electronic Technician In-Service – 4 hours</u></p> <p><u>Job-related training</u></p> <p>11. Electronic security technician's assistant (30I) <u>Electronic Security Subjects In-Service – 2 hours</u></p> <p><u>Job-related training</u></p> <p>12. <del>Compliance agent — 4 hours</del> <u>Detector canine handler (04ID) Detector Canine Handler In-Service – 8 hours (excluding certification exam)</u></p> <p><u>a. Detector canine team retraining and problem solving</u></p> <p><u>b. Search techniques</u></p> <p><u>c. Terrorist/criminal intelligence updates and team safety</u></p> <p><u>d. Certification exam (conducted by a certified detector canine handler examiner)</u></p> <p>13. <del>Firearms instructor — 4 hours</del> <u>Locksmith (25I) Locksmith In-Service – 4 hours</u></p> <p><u>Job-related training</u></p> <p>14. <del>General instructor — 4 hours</del></p>
6VAC20-171-360.C		In-service training	<b>Delete</b> section C
6VAC20-171-365	A	General firearms training requirements.	<p><b>Insert</b> outline due to insertion of additional subsections.</p> <p><u>A.</u> Firearms training endorsement is required for all private security services business personnel who carry or have immediate access to a firearm while on duty. Each person who carries or has immediate access to firearms while on duty shall qualify with each type of action and caliber of firearm to which he has access.</p>

6VAC20-171-365	B-D	General firearms training requirements.	<p><b>Insert</b> subsections to address fundamental, basic and advanced firearms training requirements. These changes are the result of the recommendation of the Private Security Services Advisory Board Training Committee with the input of certified firearms instructors and interested members of the industry. An enhanced firearms training for armed security officers/couriers and personal protection specialist has been inserted (6VAC20-171-375) and reflects an increase of 10 hours of training compared to the basic firearms training for all other armed registered categories and the advanced handgun training has been amended with a decrease of 10 hours of training.</p> <p><u>.B. Each person registered as armored car personnel, security canine handler, detector canine handler, private investigator, alarm respondent, locksmith, central station dispatcher, electronic security sales representative, electronic security technician or electronic security technician’s assistant must complete entry-level handgun training in order to apply for a firearms endorsement.</u></p> <p><u>.C. Each person applying for a registration as an armed security officer/courier must complete security officer handgun training in order to apply for a firearms endorsement.</u></p> <p><u>.D. Each person registered as a personal protection specialist must complete entry-level handgun training and advanced handgun training in order to apply for a firearms endorsement.</u></p>
Entry level handgun training.			
6VAC20-171-370.		Entry level handgun training.	<p><b>Amend</b> the entry-level firearms training compulsory minimum training standards in order to improve the training provided to the industry. These changes are the result of the recommendation of the Private Security Services Advisory Board Training committee with the input of certified firearms instructors and interested members of the industry. A firearms training for armed security officers/couriers and personal protection specialist has been inserted (6VAC20-171-375) and reflects an increase of hours of training compared to the entry-level firearms training for all other armed registered categories.</p> <p>A. Handgun classroom training.          1. The entry level handgun classroom training will include but not be limited to the following:  <del>a. The proper care and maintenance of the firearm;</del>  <del>b. Civil liability of the use of firearms;</del>  <del>c. Criminal liability of the use of firearms;</del>  <del>d. Firearms retention and storage;</del>          e. Deadly force;          f. Justifiable deadly force;  <del>g. Range safety;</del></p>

			<p>h. Principles of marksmanship;  i. Practical firearms handling and safety;  j. Judgmental shooting; and  k. Low level light shooting familiarization.</p> <p><u>a. Practical Handgun Handling</u>  (1) Identification of Handgun parts  (2) Draw  (3) Reholstering  (4) Ready Position  (5) Loading  (6) Administrative Loading  (7) Tactical reloading  (8) Rapid Unloading  (9) Unloading  (10) Malfunctions  (11) Immediate Actions Procedures  (12) Remedial action  (13) Proper care and maintenance  (14) Firearms Retention  (15) Ammunition Identification and Management  (16) Range Safety</p> <p><u>b. Fundamentals of Marksmanship</u>  (1) Grip  (2) Stance (Position)  (3) Sight Alignment  (4) Sight Picture  (5) Trigger Control  (6) Breathing  (7) Follow through</p> <p><u>c. Dim Light / Low Light / Reduced Light Practice and Familiarization</u>  (1) Identification of Target/Threat/Background  (2) Unaided Training  (3) Aided Training  (4) Flashlight Use  (5) Re-loading during low light conditions  (6) Malfunctions  (7) Range Safety</p> <p><u>d. Use of Force</u>  (1) Deadly force  (2) Justifiable deadly force</p> <p><u>e. Liability</u>  (1) Criminal liability  (2) Civil liability</p> <p><u>f. Lead exposure</u>  Total Hours (excluding written examination) —44 <u>16</u> hours  2. Written examination required.</p>
<p>6VAC20-171-370.B-D</p>		<p>Range qualification, Course of Fire and Low Light course.</p>	<p><b>Delete</b> entire section. This section has been amended and moved to 6 VAC20-171-376</p>
	<p><u>6VAC20-</u></p>	<p><u>Basic</u></p>	<p><b>Insert</b> a new section addressing basic firearms training.</p>

	<p><u>171-375.</u></p>	<p><u>handgun training.</u></p>	<p>These changes are the result recommendations of the Private Security Services Advisory Board Training committee with the input of certified firearms instructors and interested members of the industry. Improved training is required in order to reduce the high volume of negligent firearms discharge incidents and raise the standards for the purpose of the safety and welfare of the armed regulated individuals and the general public. The intermediate firearms training reflects an increase of 10 hours of training compared to the basic firearms training for all other armed registered categories.</p> <p><u>A. Handgun classroom training.</u></p> <p><u>1. The basic handgun classroom training will include but not be limited to the following:</u></p> <p><u>a. Practical Handgun Handling</u></p> <ul style="list-style-type: none"> <li><u>(1) Identification of Handgun parts</u></li> <li><u>(2) Draw</u></li> <li><u>(3) Reholstering</u></li> <li><u>(4) Ready Position</u></li> <li><u>(5) Loading</u></li> <li><u>(6) Administrative Loading</u></li> <li><u>(7) Tactical reloading</u></li> <li><u>(8) Rapid Unloading</u></li> <li><u>(9) Unloading</u></li> <li><u>(10) Malfunctions</u></li> <li><u>(11) Immediate Actions Procedures</u></li> <li><u>(12) Remedial action</u></li> <li><u>(13) Proper care and maintenance</u></li> <li><u>(14) Firearms Retention</u></li> <li><u>(15) Ammunition Identification and Management</u></li> <li><u>(16) Range Safety</u></li> </ul> <p><u>b. Fundamentals of Marksmanship</u></p> <ul style="list-style-type: none"> <li><u>(1) Grip</u></li> <li><u>(2) Stance (Position)</u></li> <li><u>(3) Sight Alignment</u></li> <li><u>(4) Sight Picture</u></li> <li><u>(5) Trigger Control</u></li> <li><u>(6) Breathing</u></li> <li><u>(7) Follow through</u></li> </ul> <p><u>c. Dim Light / Low Light / Reduced Light Practice and Familiarization</u></p> <ul style="list-style-type: none"> <li><u>(1) Identification of Target/Threat/Background</u></li> <li><u>(2) Unaided Training</u></li> <li><u>(3) Aided Training</u></li> <li><u>(4) Flashlight Use</u></li> <li><u>(5) Re-loading during low light conditions</u></li> <li><u>(6) Malfunctions</u></li> <li><u>(7) Range Safety</u></li> </ul> <p><u>d. Use of Force</u></p> <ul style="list-style-type: none"> <li><u>(1) Deadly force</u></li> <li><u>(2) Justifiable deadly force</u></li> </ul> <p><u>e. Liability</u></p> <ul style="list-style-type: none"> <li><u>(1) Criminal liability</u></li> <li><u>(2) Civil liability</u></li> </ul>
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			<p><u>(3) Negligent discharge prevention</u>  <u>f. Judgmental shooting: Judgmental shooting scenarios will be conducted in the classroom/range</u>  <u>(1) Shoot/don't shoot judgment</u>  <u>(2) Turn and fire drills</u>  <u>(3) Failure to stop drills</u>  <u>(4) Multiple target drills</u>  <u>g. Lead exposure</u>  <u>Total Hours (excluding written examination) —24 hours</u>  <u>2. Written examination required.</u></p>
	<p><u>6VAC20-171-376.A</u></p>	<p><u>Handgun range qualification.</u></p>	<p><b>Insert</b> and amend the section for handgun qualifications to include range qualifications, course of fire and low-light course of fire and advanced handgun course of fire. These requirements were included under the current regulations 6 VAC20-171-370B-D. These changes are the result recommendations of the Private Security Services Advisory Board Training committee with the input of certified firearms instructors and interested members of the industry. Improved training is required in order to reduce the high volume of negligent firearms discharge incidents and raise the standards for the purpose of the safety and welfare of the armed regulated individuals and the general public.</p> <p><u>A. Range qualification (no minimum hours). The purpose of the range qualification course is to provide practical firearms training and qualification to individuals desiring to become armed private security services business personnel.</u></p> <p><u>1. Prior to the date of range training, it will be the responsibility of the school director to ensure that all students are informed of the proper attire and equipment to be worn for the firing range portion of the training. Equipment needed: handgun, belt with directional draw holster, i.e., one that is worn on the same side of the body as the shooting hand, two speed loaders or three magazines, ammunition (100 rounds)</u></p> <p><u>2. Each student will fire a minimum of 22 rounds of factory loaded ammunition for familiarization prior to qualification. (There is no course of fire and it is not scored; it is at the firearms instructor's discretion on how the round will be utilized.)</u></p> <p><u>3. Course shall be fired double action or double/single action, except for single action semi-automatic handguns.</u></p> <p><u>4. All qualifications shall be conducted using a B-27 silhouette target or the FBI "Q" target. Alternate targets may be utilized with prior approval by the department.</u></p> <p><u>5. With prior approval of the department, a reasonable modification of the firearms course may be approved to accommodate qualification on indoor ranges.</u></p> <p><u>6. For those utilizing semi-automatic firearms, it is not necessary to reload after every stage so long as there are at least 3 tactical reloads during the course of fire.</u></p>

			<p><u>7. A certified firearms instructor must be present on the range directly controlling the firing line during all phases of firearms training. There shall be a minimum of one certified firearms instructor per five shooters on the line.</u></p> <p><u>8. The range qualification of individuals shall be scored as follows:</u></p> <p><u>a. B27 target: (use indicated K-value) 7, 8, 9, 10 X rings — value 5 points, other hits on silhouette —value 0 points: divide points scored by maximum possible score to obtain decimal and convert to percentage, e.g., <math>225 \div 300 = .75 = 75\%</math>.</u></p> <p><u>b. FBI Q target: all hits inside the bottle —value 5 points; hits outside the bottle —value 0 points.</u></p> <p><u>9. Although not scored, each student is required to complete the low light range/night time practice as outlined in Section C and the familiarization course of fire.</u></p>
	<p><u>6VAC20-171-376.B-C</u></p>	<p><u>Handgun range qualification. Virginia Course of Fire for Handguns</u></p>	<p><b>Insert</b> and amend the section for handgun qualifications to include range qualifications, course of fire and low-light course of fire and advanced handgun course of fire. These requirements were included under the current regulations 6 VAC20-171-370B-D. These changes are the result recommendations of the Private Security Services Advisory Board Training committee with the input of certified firearms instructors and interested members of the industry. Improved training is required in order to reduce the high volume of negligent firearms discharge incidents and raise the standards for the purpose of the safety and welfare of the armed regulated individuals and the general public.</p> <p><u>B. Course: Virginia private security course of fire for handguns. The course of fire shall be conducted using, at a minimum, the requirements set forth in this subsection. Strong/weak hand refers to the primary hand used in firing the firearm. The opposite hand may be used for support. The course of fire shall be conducted in the following phases:</u></p> <p><u>1. Phase 1: 3 yards, utilizing weaver, modified weaver, or isosceles stance, 18 rounds:</u></p> <p><u>a. Load 6 rounds and holster loaded firearm.</u></p> <p><u>b. On command, draw and fire 2 rounds (3 seconds), repeat 2 times.</u></p> <p><u>c. Load 6 rounds and holster loaded firearm.</u></p> <p><u>d. On command, draw and fire 6 rounds with strong hand.</u></p> <p><u>e. Unload, reload 6 rounds and fire 6 rounds with weak hand (25 seconds.)</u></p> <p><u>2. Phase 2: 7 yards, utilizing weaver, modified weaver or isosceles stance, 24 rounds:</u></p> <p><u>a. Load 6 rounds and holster loaded firearm.</u></p> <p><u>b. On command, draw and fire 1 round (2 seconds),</u></p>

			<p><u>repeat 5 times.</u></p> <p><u>c. Load 6 rounds and holster loaded firearm.</u></p> <p><u>d. On command, draw and fire 2 rounds (3 seconds), repeat 2 times.</u></p> <p><u>e. Load 6 rounds and holster loaded firearm.</u></p> <p><u>f. On command, draw and fire 6 rounds, reload 6 rounds, fire 6 rounds (30 seconds).</u></p> <p><u>3. Phase 3: 15 yards, 70 seconds, 18 rounds</u></p> <p><u>a. Load 6 rounds and holster loaded firearm.</u></p> <p><u>b. On command, assume kneeling position, draw and fire 6 rounds with strong hand.</u></p> <p><u>c. Assume standing position, unload, reload and fire 6 rounds from weak-hand barricade position.</u></p> <p><u>d. Unload, reload and fire 6 rounds from strong-hand barricade position (kneeling position may be fired using barricade position) (70 seconds).</u></p> <p><u>C. Low light course: Virginia private security low light familiarization course of fire for handguns. The course of fire shall be conducted using, at a minimum, the requirements set forth in this subsection. Equipment needed: belt with directional draw holster, handgun, two speed loaders or three magazines, range ammunition (18 rounds). Equipment provided by instructor: A range that can simulate low light or a pair of welders goggles for each student that simulates low light. Strong/weak hand refers to the primary hand used in firing the firearm. The opposite hand may be used for support. The course of fire shall be conducted in the following phases:</u></p> <p><u>1. Phase 1; 3 yards, utilizing weaver or isosceles stance, 6 rounds:</u></p> <p><u>a. Load 6 rounds and come to ready</u></p> <p><u>b. On command, fire 2 rounds (3 seconds) repeat 2 times(30 seconds)</u></p> <p><u>2. Phase 2; 7 yards, utilizing weaver or isosceles stance, 12 rounds</u></p> <p><u>a. Load 6 rounds and come to ready</u></p> <p><u>b. On command, fire 2 rounds (5 seconds), repeat 2 times</u></p> <p><u>c. Load 6 rounds and come to ready</u></p> <p><u>d. On command, draw and fire 3 rounds (6 seconds), and repeat.</u></p>
6VAC20-171-380.		Entry level shotgun training.	<p><b>Amend</b> the entry-level shotgun firearms compulsory minimum training standards in order to improve the training provided to the industry. These changes are the result of the recommendation of the Private Security Services Advisory Board Training committee with the input of certified firearms instructors and interested members of the industry. have been amended. The amendments reflect an increase of 2 hours of training.</p>

			<p>A. Shotgun classroom training. <u>Individual must first successfully complete entry-level or security officer handgun training.</u> The <del>entry-level</del> <u>entry-level</u> shotgun classroom instruction will emphasize but not be limited to:</p> <ol style="list-style-type: none"> <li><del>1. Safe and proper use and handling of shotgun;</del></li> <li><del>2. Nomenclature;</del></li> <li><del>3. Positions and combat loading techniques;</del></li> <li><del>4. Decision-making for the officer with the shotgun;</del></li> <li><del>5. Transition from sidearm to shotgun; and</del></li> <li><del>6. Shotgun retention and proper use of a sling.</del></li> </ol> <p><del>Total hours — 2 hours</del></p> <ol style="list-style-type: none"> <li><u>1. Shotgun handling techniques</u> <ol style="list-style-type: none"> <li><u>a. Identification of shotgun parts</u></li> <li><u>b. Slings – traditional sling, single point sling, 3 point sling</u></li> <li><u>c. Cruiser carry conditions</u></li> <li><u>d. Cruiser safe</u></li> <li><u>e. Chambering</u></li> <li><u>f. Reloading</u></li> <li><u>g. Transition from handgun to shotgun/shotgun to handgun (if applicable)</u></li> <li><u>h. Malfunctions</u> <ol style="list-style-type: none"> <li><u>(1) Immediate actions procedures</u></li> <li><u>(2) Remedial action</u></li> </ol> </li> <li><u>i. Proper care and maintenance</u></li> <li><u>j. Shotgun retention</u></li> <li><u>k. Ammunition management and identification</u></li> <li><u>l. Range safety</u></li> <li><u>m. Dim light/low light</u></li> </ol> </li> <li><u>2. Fundamentals of shotgun marksmanship</u> <ol style="list-style-type: none"> <li><u>a. Grip</u></li> <li><u>b. Stance (position)</u></li> <li><u>c. Sight alignment</u></li> <li><u>d. Sight picture</u></li> <li><u>e. Trigger control</u></li> <li><u>f. Breathing</u></li> <li><u>g. Follow through</u></li> </ol> </li> <li><u>3. Written examination</u></li> </ol> <p><u>Total hours excluding examination (3 hours)</u></p>
6VAC20-171-380.		Entry level shotgun training.	<p><b>Amend</b> the entry-level shotgun firearms range qualification requirements and course of fire in order to improve the training provided to the industry. These changes are the result of the recommendation of the Private Security Services Advisory Board Training committee with the input of certified firearms instructors</p>

			<p>and interested members of the industry. have been amended. The amendments reflect an increase of 2 hours of training.</p> <p>B. Range qualification (no minimum hours). The purpose of the range firing course is to provide practical shotgun training <u>and qualification</u> to those individuals who carry or have immediate access to a shotgun in the performance of their duties.</p> <p><del>1. For certification, 12 gauge, double aught "00" buckshot ammunition shall be used. Five rounds.</del></p> <p><del>2. Scoring — 70% of available pellets must be within silhouette.</del></p> <p><u>1. Familiarization: Prior to the qualification course, all shooters are required to fire a familiarization exercise consisting of 5 rounds minimum using 12 gauge, double aught "00" buckshot or rifle slug ammunition and 6 rounds minimum of handgun rounds. The exercise shall include transition drills from handgun to shotgun and shotgun to handgun. This exercise is not scored and the distance is at the discretion of the instructor.</u></p> <p><u>2. Qualification: Fire 5 rounds of shotgun rounds (buckshot and/or rifled slugs if issued) on a daylight course using B27 single/multiple targets with 70% accuracy.</u></p>
6VAC20-171-390.		Advanced handgun training	<p><b>Amend</b> the advanced handgun training curriculum required for personal protection specialists. The topics have been amended to address concealed carry laws and use of force. The hours are reduced due to the removal of duplicate training objectives already addressed in the basic firearms training requirements which is a prerequisite for the advanced handgun training.</p> <p>B. Advanced handgun classroom training.</p> <p>1. The advanced handgun training will include but not be limited to:</p> <ul style="list-style-type: none"> <li>a. <del>Proper care of the weapon</del>Firearms safety;</li> <li>b. <del>Civil and criminal liability of the use of firearms;</del></li> <li>c. <del>Criminal liability of the use of firearms</del>Concealed carry law and authority;</li> <li>d. <del>Weapons retention</del>Function of firearms in close protection operations;</li> <li>e. <del>Deadly force</del>Deployment of firearms in close protection operations;</li> <li>f. <del>Justifiable deadly</del> Use of force;</li> <li>g. <del>Range safety;</del></li> <li>h. <del>Practical firearms handling;</del></li> <li>ig. Principles of Advanced marksmanship; and</li> <li>jh. Decision-making for the personal protection specialist.</li> </ul> <p>Total hours (excluding written examination) —<del>24 hours</del> — <u>14 hours</u></p> <p>2. Written examination required.</p>
6VAC20-171-390.D2		Advanced handgun	<p><b>Amend</b> the 2<sup>nd</sup> paragraph, 1<sup>st</sup> and 5<sup>th</sup> sentence to insert numerical language for grammatical purpose.</p>

		training	<p>D. Course: Virginia Private Security Advanced Handgun Course of Fire.</p> <p>2. Stage Two: Turn-and-fire drill.</p> <p>All handguns are loaded with <del>six</del> <u>6</u> rounds of ammunition and safely holstered.</p> <p>Once facing the target and in a stable position, they must safely draw and fire <del>two</del> <u>2</u> rounds at the designated target circle.</p>
6VAC20-171-390.D3		Advanced handgun training	<p><b>Amend</b> the 1<sup>st</sup> paragraph, and the 2<sup>nd</sup> paragraph, to replace with numerical language for grammatical purpose.</p> <p>3. Stage Three: Failure to stop drill. Stage three of the advanced handgun course of fire is held at a firing range and consists of failure to stop drills fired from the <del>seven-yard</del> <u>7-yard</u> line (straight draw hip holsters only).</p> <p>All handguns are loaded with <del>six</del> <u>6</u> rounds of ammunition and are safely holstered. Shooters are positioned with their backs to the targets, facing the instructor up-range. The instructor will command all shooters to walk at a normal pace, directly away from the target. Upon the command "fire," given at approximately the <del>seven-yard</del> <u>7-yard</u> line, each shooter must safely turn around while acquiring a firm grip on their weapon as performed in the previous drill. Once facing the target, the students will draw and fire <del>two</del> <u>2</u> rounds at the 8-inch body circle, and then one immediate round to the 4-inch head circle. The student will then safely reholster. The drill will be repeated three times.</p>
6VAC20-171-390.D4		Advanced handgun training	<p><b>Amend</b> the last sentence in the 2<sup>nd</sup> paragraph to replace text with numerical language for grammatical purpose.</p> <p>4. Stage Four:</p> <p>Each two-round pair must be fired within <del>four</del> <u>4</u> seconds of the called command. Direction commands will be called at 3-5 yards, 5-7 yards, and then 8-10 yards.</p>
6VAC20-171-390.D5		Advanced handgun training	<p><b>Amend</b> the last sentence in the 2<sup>nd</sup> and 3<sup>rd</sup> paragraph to replace text with numerical language for grammatical purpose.</p> <p>5. Stage Five: Judgmental shooting.</p> <p>There is a <del>four-second</del> <u>4-second</u> time limit at this stage for any "shoot" situation.</p> <p>If two targets are used, then the time limit is raised to <del>six</del> <u>6</u> seconds, regardless of whether two hostile targets are used or one hostile with one friendly.</p>
	<u>6VAC20-171-395.A</u>	<u>Entry-level patrol rifle training.</u>	<p><b>Insert</b> new section establishing minimum firearms training standards and course of fire for patrol rifle. Patrol rifles are being utilized by security companies but are the only use of firearm not yet regulated. This training program will ensure a minimum qualification standard is met.</p>

			<p><b><u>6VAC20-171-395. Entry-level patrol rifle training.</u></b></p> <p><u>A. Patrol rifle classroom training. Individual must first successfully complete security officer handgun training. The entry-level patrol rifle classroom instruction will emphasize but not be limited to:</u></p> <ol style="list-style-type: none"> <li><u>1. Rifle handling techniques</u> <ol style="list-style-type: none"> <li><u>a. Nomenclature/identification of rifle parts</u></li> <li><u>b. Field stripping and reassembling</u></li> <li><u>c. Loading and unloading</u></li> <li><u>d. Chambering</u></li> <li><u>e. Reloading</u></li> <li><u>f. Slings</u> <ol style="list-style-type: none"> <li><u>(1) Traditional sling</u></li> <li><u>(2) Single point sling</u></li> <li><u>(3) 3-Point sling</u></li> </ol> </li> <li><u>g. Transition from handgun to rifle/rifle to handgun</u></li> <li><u>h. Malfunctions</u></li> <li><u>i. Immediate actions procedures</u></li> <li><u>j. Remedial action</u></li> <li><u>k. Proper care and maintenance</u></li> <li><u>l. Rifle retention</u></li> <li><u>m. Ammunition management and identification</u></li> <li><u>n. Range safety</u></li> <li><u>o. Dim light/low light</u></li> </ol> </li> <li><u>2. Fundamentals of rifle marksmanship</u> <ol style="list-style-type: none"> <li><u>a. Grip</u></li> <li><u>b. Stance (position)</u></li> <li><u>c. Sight alignment</u></li> <li><u>d. Sight picture</u></li> <li><u>e. Trigger control</u></li> <li><u>f. Breathing</u></li> <li><u>g. Follow through</u></li> </ol> </li> <li><u>3. Zeroing iron sights</u> <ol style="list-style-type: none"> <li><u>a. Establishing mechanical zero</u></li> <li><u>b. Zeroing process</u></li> </ol> </li> <li><u>4. Dim light shooting</u> <ol style="list-style-type: none"> <li><u>a. Hours of darkness/dim light</u></li> <li><u>b. Identification requirements</u></li> <li><u>c. Unaided reduced light shooting techniques</u></li> <li><u>d. Aided reduced light shooting techniques</u></li> </ol> </li> <li><u>5. Shooting positions</u> <ol style="list-style-type: none"> <li><u>a. Fundamentals of shooting positions</u></li> <li><u>b. Basic patrol positions</u></li> </ol> </li> <li><u>6. Use of force</u></li> </ol>
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	<u>6VAC20-171-395.B</u>	<u>Entry-level patrol rifle training.</u>	<p><b>Insert</b> new section establishing the range qualification and course of fire for patrol rifle. Patrol rifles are being utilized by security companies but are the only use of firearm not yet regulated. This training program will ensure a minimum qualification standard is met</p> <p><u>B. Range qualification (no minimum hours). The purpose of the range firing course is to provide practical patrol rifle training and qualification to those individuals who carry or have immediate access to a patrol rifle in the performance of their duties with the sighting system that will be carried on duty.</u></p>
	<u>6VAC20-171-395.C</u>	<u>Entry-level patrol rifle training.</u>	<p><b>Insert</b> new section establishing the range qualification and course of fire for patrol rifle. Patrol rifles are being utilized by security companies but are the only use of firearm not yet regulated. This training program will ensure a minimum qualification standard is met</p> <p><u>C. Patrol rifle qualification course.</u></p> <p><u>1. All rifle qualification will be done with a law-enforcement type and caliber rifle. A total of 60 rounds of ammunition will be fired for rifle qualification.</u></p> <p><u>2. All rifle qualification firing will be done with iron sights. In addition, if an officer is using an optic while on duty, they must qualify with that optic.</u></p> <p><u>3. All indoor rifle qualification firing will be done at a range that accommodates a distance of 25 yards between the shooter and the target. No variances of this distance are allowed. The indoor target system will contain two targets per shooter mounted side by side. The targets will be FBI Q-R, half-sized silhouette targets. Use of this target type will simulate shooting at 50 yards.</u></p> <p><u>4. All outdoor rifle qualification firing will be done at 50 yards using the FBI Q silhouette full-sized targets. Two of these targets will be mounted side by side for each shooter.</u></p> <p><u>5. FBI Q silhouette targets are used for rifle qualification, scoring will be all hits inside the bottle – value 5 points; outside the bottle – value 0 points. With these targets a maximum score of 300 points is possible. Minimum qualification is 85% or 255 points.</u></p> <p><u>D. Patrol rifle course of fire.</u></p> <p><u>1. Prior to qualification, all shooters are required to fire a minimum of 30 familiarization rounds which will include transition drills from handgun to rifle and rifle to handgun. Shooters will fire a minimum of 10 rounds with a handgun. This exercise is not scored and the distance is at the discretion of the instructor.</u></p>



			<p><u>2. Stage 1; 50 yards/25 yards (indoors) – Shooters will load their rifle with a magazine of 20 rounds and place the selector on safe. From the standing position with the rifle in the sling carry position, on command the shooters will fire 5 rounds from the standing position, place the selector on safe, assume a kneeling position and fire 5 rounds, place the selector on safe shooter will assume the prone position, the shooter will fire 10 rounds. All 20 rounds of this stage will be fired at the left hand target. (1 minute) When firing is complete shooters will place the selector on safe and await further command.</u></p> <p><u>3. Stage 2; 25 yards – Shooters will load their rifle with a magazine of 15 rounds and place the selector on safe. From the standing position with the rifle in the sling carry position, on command the shooters will fire 5 rounds from the standing position, place the selector on safe, assume a kneeling position and fire 5 rounds, place the selector on safe shooter will assume the prone position, the shooter will fire 5 rounds. All 15 rounds of this stage will be fired at the right hand target. (45 seconds) When firing is complete shooters will place the selector on safe and await further command.</u></p> <p><u>4. Stage 3; 15 yards - On command shooters will assume the standing position and load rifle with a magazine of 10 rounds. On command shooters will fire 5 rounds at the right-hand target, place the selector on safe, assume the kneeling position and fire 5 rounds at the left-hand target in 15 seconds.</u></p> <p><u>5. Stage 4; 7 yards - On command shooters will load rifle with a magazine of 20 rounds, selector in the safe position, and then place the rifle in the sling carry position. On command shooters will fire 2 rounds into the right target with a 2 second time limit. Upon completion of firing shooters will place the selector on safe and the rifle in the sling carry position. This exercise will be fired 5 times with a total of 10 rounds expended.</u></p> <p><u>6. Stage 5; 5 yards - On command shooters will load rifle with a magazine of 5 rounds, selector in the safe position, and then place the rifle in the sling carry position. On command shooters will fire 1 round into the left target head with a 2 second time limit. Upon completion of firing shooters will place the selector on safe and the rifle in the sling carry position. This exercise will be fired 5 times with a total of 5 rounds expended.</u></p>
	<p><u>6VAC20-171-395.C</u></p>	<p><u>Entry-level patrol rifle training.</u></p>	<p><b>Insert</b> new section establishing the low light/dim light course of fire for patrol rifle. Patrol rifles are being utilized by security companies but are the only use of firearm not yet regulated. This training program will ensure a minimum qualification standard is met</p> <p><u>E. Low light/dim light qualification course of fire.</u></p> <p><u>7 yards - Under low-light conditions, on command shooters will fire 5 rounds at the left target, place the selector in the safe position, assume the kneeling position</u></p>

			<u>and fire 5 rounds at the right target. A time limit of 1 minute is allowed for this stage.</u>
6VAC20-171-400.		Firearms retraining.	<b>Amend</b> title to remove handgun/shotgun, firearms training also includes patrol rifle as well.
6VAC20-171-400.		Firearms retraining.	<p><b>Amend</b> the subsection to incorporate the amendments to firearms training requirements and establish the retraining standards.</p> <p><u>A. All armed private security services business personnel with the exception of personal protection specialists, must satisfactorily complete <del>two</del> 4 hours of firearms classroom training or practical exercises and range training, and requalify as prescribed in paragraph B and C of section <del>6VAC20-171-370</del> 6 VAC 20-171-376 for handgun. Firearms instructors who have received prior approval from the department may substitute the alternative course specified in 6VAC20-171-370.D and the low-light course specified in Section 6 VAC20-171-370 C for re-qualification firing with a semi-automatic handgun, and 6VAC20-171-380 for shotgun, if applicable, on an annual basis prior to the issuance of the Firearms Endorsement, as follows:</u></p> <p>1. Classroom retraining or practical exercises — 2 hours                  2. Range qualification with handgun and/or shotgun, if applicable (no minimum hours)                  Total hours (excluding range qualification) — 2 hours</p>
6VAC20-171-400.	B	Firearms retraining.	<p><b>Amend</b> the subsection to incorporate the amendments to firearms training requirements and establish the retraining standards.</p> <p><u>B. Re-qualification training with the shotgun shall be comprised of 3 hours of classroom training or practical exercises and range training and re-qualification firing as specified in 6 VAC20-171-380.B.</u></p>
6VAC20-171-400.		Firearms retraining.	<p><b>Amend</b> the subsection to incorporate the amendments to firearms training requirements and establish the retraining standards.</p> <p><u>C. Re-qualification training with the patrol rifle shall be comprised of 4 hours of firearms classroom training or practical exercises and range training and re-qualification firing as specified in 6VAC20-171-395 for Patrol Rifle .</u></p>
6VAC20-171-400.		Firearms retraining.	<p><b>Amend</b> the subsection to incorporate the amendments to firearms training requirements and establish the retraining standards.</p> <p><u>D. All applicable firearms retraining must be completed and documented with the department on an annual basis prior to the issuance of a firearms endorsement.</u></p>
6VAC201-171-420		Advanced handgun retraining	<p>Amend to read:</p> <p>All armed private security services business personnel</p>

			registered in the category of personal protection specialist or other armed category seeking advanced handgun designation must satisfactorily complete advanced handgun retraining, which includes eight hours of firearms classroom training and range training, and requalify as prescribed in <a href="#">6VAC20-171-390</a> C for handgun <del>within the 12-month period immediately preceding the expiration date of his registration</del> as follows:
6VAC20-171-420.		Advanced handgun retraining.	<b>Delete</b> specific content hours. This provides the training school and instructor with control of the content and hours required for each submitted objective within a total minimum 8 hour course.  1. Legal authority and decision making —4 hours 2. Handgun safety, marksmanship and skill development —4 hours
Article 3 Security Canine Handler Training Requirements 6VAC20-171-430.		Entry level security canine handler training.	<b>Delete</b> entire article and section, the Security canine handler entry-level training has been moved to its appropriate section under 6VAC20-171-350 – Entry-level training for registered personnel.
6VAC20-171-440.		Security canine handler retraining.	<b>Delete</b> entire section, the Security canine handler in-service training has been moved to its appropriate section under 6VAC20-171-360 – In Service training for registered personnel.
6VAC20-171-445		Training Exemptions	<b>Amend</b> Article 4 to Article 3
6VAC20-171-500B8		Disciplinary action; sanctions; publication of records.	<b>Insert</b> conditional agreements as an additional sanction to reflect the current policies and procedures utilized in the Department. B. <u>8. Conditional agreements.</u>
6VAC20-171-550		Appeals	<b>Delete</b> Agency mailing address
6VAC20-171-560		Court Review	<b>Delete</b> Agency mailing address
FORMS (6VAC20-171)		Forms	<b>Amend</b> section to include new and updated forms utilized in the regulation of Private Security Services