



Final Regulation Agency Background Document

Agency name	DPOR/Board for Architects, Professional Engineers, Land Surveyors, Certified Interior Designers, and Landscape Architects (APELSCIDLA Board)
Virginia Administrative Code (VAC) citation	18 VAC 10 -20
Regulation title	Board for Architects, Professional Engineers, Land Surveyors, Certified Interior Designers, and Landscape Architects Regulations
Action title	To implement a mandatory continuing education program as required by HB1054 (2006)
Date this document prepared	October 13, 2008

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

Brief summary

Please provide a brief summary (no more than 2 short paragraphs) of the proposed new regulation, proposed amendments to the existing regulation, or the regulation proposed to be repealed. Alert the reader to all substantive matters or changes. If applicable, generally describe the existing regulation. Also, please include a brief description of changes to the regulation from publication of the proposed regulation to the final regulation.

The underlying legislation (§ 54.1-404.2 of the Code of Virginia, as established by HB1054 from the 2006 legislative session - see Chapter 683 of the 2006 Acts of Assembly) requires that the Board develop a continuing education program to require the equivalent of 16 hours per biennium of Board approved continuing education activities for the renewal or reinstatement of architect, professional engineer, and land surveyor licenses. The proposed changes are intended to fulfill the requirements of HB1054.

Other changes which may be necessary may also be considered.

Statement of final agency action

Please provide a statement of the final action taken by the agency including (1) the date the action was taken, (2) the name of the agency taking the action, and (3) the title of the regulation.

On September 17, 2008, the Board for Architects, Professional Engineers, Land Surveyors, Certified Interior Designers and Landscape Architects adopted final Board for Architects, Professional Engineers, Land Surveyors, Certified Interior Designers and Landscape Architects Regulations.

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 numbers, if applicable, and (2) promulgating entity, i.e., agency, board, or person. Describe the legal authority and the extent to which the authority is mandatory or discretionary.

Section 54.1-404.2 of the Code of Virginia, as established by HB1054 from the 2006 legislative session (see Chapter 683 of the 2006 Acts of Assembly), mandates that the Board promulgate regulations to create a continuing education program for the renewal and reinstatement of architect, professional engineer, and land surveyor licenses.

Purpose

Please explain the need for the new or amended regulation. Describe the rationale or justification of the proposed regulatory action. Detail the specific reasons it is essential to protect the health, safety or welfare of citizens. Discuss the goals of the proposal and the problems the proposal is intended to solve.

HB1054 was passed during the 2006 legislative session which mandates that the Board implement a continuing education program for the renewal and reinstatement of architect, professional engineer, and land surveyor licenses. This regulatory action is intended to fulfill the requirements as established by HB1054. Such a program should lead to better educated practitioners which should, thereby, increase the protection of the health, safety and welfare of the public.

Other changes which may be necessary may also be considered.

Substance

Please identify and explain the new substantive provisions, the substantive changes to existing sections, or both where appropriate. A more detailed discussion is required under the "All changes made in this regulatory action" section.

The Board will develop regulations to implement the continuing education program in accordance with the provisions of § 54.1-404.2 of the Code of Virginia. Provisions relating to the continuing education requirements (and the criteria for what is acceptable continuing education activity) will be included as well relevant administrative requirements (certification of completion, retention of records, grounds for disciplinary action, etc.).

Other changes which may be necessary may also be considered.

Issues

Please identify the issues associated with the proposed regulatory action, including:
 1) *the primary advantages and disadvantages to the public, such as individual private citizens or businesses, of implementing the new or amended provisions;*
 2) *the primary advantages and disadvantages to the agency or the Commonwealth; and*
 3) *other pertinent matters of interest to the regulated community, government officials, and the public. If there are no disadvantages to the public or the Commonwealth, please indicate.*

The public and the Commonwealth should be better served as licensed architects, professional engineers, and land surveyors will have to show compliance with the Board's continuing education requirements which should result in architects, professional engineers, and land surveyors being better educated and, therefore, less of a threat to the public due to inadequate knowledge. However, the cost of complying with the new requirements will most likely be passed on by licensed architects, professional engineers, and land surveyors to their customers.

Changes made since the proposed stage

Please describe all changes made to the text of the proposed regulation since the publication of the proposed stage. For the Registrar's office, please put an asterisk next to any substantive changes.

Section number	Requirement at proposed stage	What has changed	Rationale for change
18 VAC 10-20-683 B.		Removed the word "board"	For consistency throughout document

Public comment

Please summarize all comments received during the public comment period following the publication of the proposed stage, and provide the agency response. If no comment was received, please so indicate.

There were 761 comments received during public comment period (March 3, 2008 – May 2, 2008, with a public hearing held on March 19, 2008) regarding the proposed regulations. This represents less than 2% of our licensee population. The majority of the commenters were against implementation.

#	REGULATION #	SUMMARY OF COMMENT(S)
	COMMENTOR'S NAME	BOARD RESPONSE
1		The aforementioned commenters are against the implementation of a Mandatory Continuing Education program due to one or more of the following reasons: <ul style="list-style-type: none"> • Financial Burden • No Value Gained • No Demonstrated Need for CE • Time Burden • No Tangible Benefit

		<ul style="list-style-type: none"> • Impractical and Unnecessary • Will Diminish Regulant Population • Proposes too Many Constraints
	<p>Darrell S. Larsen, P.E.; William B. Bott, P.E.; Carey Johnston; R. Morgan Burrow, Jr., P.E.; Jay Maji, P.E.; James M. Gross, P.E.; Sachchida N. Gupta, P.E.; David Darling; Apxtect; James K. Fishback, P.E.; Maurice W. Pitt; Spencer Adsit; Bryan Jones, L.S.; Jim Purdy, P.E.; S. W. Scallion, P.E.; Craig W. Talcott, P.E.; Martin S. Lane; Joseph Pfab, P.E.; Pete Petersen; B. Shah, P.E.; Ragnath Parthasarathi, P.E.; Kipp J. Yule, P.E.; Arun Mehta, P.E.; Paul Quattrociocchi, P.E.; Joseph L. Spruill; Richard L. Larson; Shayne Smith, P.E.; Robert W. Jorgenson, P.E.; James F. Holdener, P.E.; William P. Corish, P.E.; Terence L. Bowers, P.E.; Will Aygarn; Jerry Kobylski; Robert H. Timmins, P.E.; Leonard W. Wagoner, P.E.; Rayford B. Smith; John D. Melnick; Roy Mondy; Richard B. Lanier; Lillian Pfluke, P.E.; Susan Benson, LSB; Scott C. Fleig, PE; Greg Budnick, P.E.; Brian Weaver, P.E.; Joseph Bonometti, P.E.; Timothy M. Scruby, P.E.; Daniel H. Davis, P.E.; Carl R. Klee, P.E.; Bill Loving, Registered Architect; Ted Achorn; Hunter Bristow, RA; Anatoly Gregor, P.E.; Gregory Flory, P.E.; Robert Hines; James C. Owens; John W. Ostergren, Jr., P.E.; Jay Maji, P.E.; James Kyle; R. H. Edwards; Chris Klasing; R. L., Licensed Architect; Frank P. Salzano, P.E.; Ralph A. Thompson; Brandon R. Bagwell, P.E.; Roger Thiesfeld, P.E.; James G. O'Neill; Stephen Rosen; David A. McDaniel; Charles B. Kruse, III, P.E.; Bruce Zimmerman; Dwight Baker, P.E.; Mark Lindsey; Joseph F. Iaquinto, P.E.; Anonymous P.E.; Henry Burruss; Harry L. Masten, P.E.; Ronald D. Williams, P.E.; Shawn Saunders; Robert F. Hynes, P.E.; Stephen M. Platt, P.E., L.S.; Elizabeth Platt, P.E.; Tom Nyman, P.E.; Mack M. B. Homs, P.E.; Jeff Carr, L.S.; Jeelani Gulam, P.E.; Chaz Weaver, P.E.; Jerry G. Williams, P.E.; Kevin Smola; Daniel Young, P.E.; Wayne Schleder; David A. Bess, L.S.; Jeffrey T. Collins, P.E., CLS; Hunter Bristow, RA; David A. Jones, P.E.; Ronald Grandmason; William A. Lucas, P.E.; Mark Lukhard, P.E.; Berton J. Braley, III; Michael Bogenreif, P.E.; Anonymous; Gregory A.</p>	<p>The law was passed by the General Assembly in 2006 (§54.1-404.2). After the law was passed, the APELSCIDLA Board was tasked with creating and implementing the regulations. The sixteen continuing education hours required at time of renewal do not have to be pre-approved by the Board so long as the activities are related to practice of the profession of the license being renewed, have a clear purpose and objective which will maintain, improve, or expand the skills and knowledge relevant to the licensee's area of practice as defined in Chapter 4 of Title 54.1 of the Code of Virginia. The required continuing education credit hours may be in areas related to business practice including project management, risk management, and ethics, which have demonstrated relevance to the licensee's area of practice as defined in Chapter 4 of Title 54.1 of the Code of Virginia. The regulations do not prohibit online courses that meet the above standards.</p>

<p>Wolven, P.E.; P. Scott Morris; Chaz Weaver, P.E.; Mark Heinrich, P.E.; John Gorman; Michael K. Sheaffer, P.E.; Thomas Melton; John Osborne; John Daws; Arthur F. Edwards, L.S.; Scott Detienne, RA; Joe DuFresne; Len Dolby; Peter P. Andreu, Jr., Architect; Matthew D. Bliven, P.E.; Brian A. MacDonald; N. R. McKinley; George H. Gardner, P.E.; J. Michael Papit; Eric Fennell, P.E.; Paul S. Julian, P.E., PLS; John Yeisley; Jim Studer, Civil Engineer; Patrick Osborne, P.E.; John Piggott, P.E.; R. Gordon Kirk; Paul Becker; Eirc Zimmerman, P.E.; Robert Jones, P.E.; Richard Curd, RA; Dennis Neil Rankins; David Darling, P.E.; James B. Smith, P.E.; Nikolay Voutchkov; John Reeke, P.E.; Debra Gilliam, P.E.; Steven Sunderman; Roy Chapman, Architect; Aaron Park, P.E.; Ronald W. Trostel, P.E.; Marlin G. Lord, Architect; Mohammad Azmi, P.E.; Gary L. Brown, P.E.; Robert E. Coffey, Jr., P.E.; Robert Ellis, P.E.; Anthony Szewczyk; Timothy Cherry; Robert Berger; John J. Egan, AIA; Brent D. Phillips, P.E.; Randall N. Gattis; David Ford, P.E.; Greg Budnik, P.E.; Stephen J. Hatch, P.E.; Joseph R. Pincus; Charles H. Heaton; Charles E. Venditti, P.E.; Kevin J. Johnson, P.E.; Donald Prunty, Jr., P.E.; Charles N. Calvano; Robert D. Steele, P.E.; Robert Thompson, P.E.; Ronald Gordon, Jr., CLS; Paul Jennette; William Plymake, P.E.; Tom Welch, P.E.; Kenneth O. Peterson; Thomas L. Brandon, P.E.; Stephen W. Bobiak, Jr., P.E.; George W. Robertson; Anonymous; Krista Minotto Schauer, Architect; Susan Cheek, Architect; R. M. Lloyd, P.E.; Anonymous; Norton; William Eisenhauer, P.E.; Anonymous P.E.; Sung Kim; Anonymous; Richard M. Neville, P.E.; Anonymous PE; David Forsythe, P.E.; Dave Hornsby, P.E.; Andrew Miller, P.E.; Kristin L. Allen; Ed Morsi, P.E.; John Peterson, P.E.; Tara Anderson, P.E.; Alan Batson, Architect; Cathy C. Roberts, P.E.; Frank Mezzanotte, P.E.; Anonymous Architect; Thomas E. Brannen, P.E.; Henry Burke, P.E.; Anonymous P.E.; Richard Davenport, P.E.; Shawn Emmons; Marion C. David, RA; George H. Harris, P.E.; Russell McDaniel, P.E.; Stephen S. Szoke; Mohammed Yousuf; Brian K. Williams, P.E.; John S. Henley, P.E.; William G. Thomas, P.E.; Darin DeBlasio, RA; William</p>	
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<p>Fletcher; Donald L. Goddard, P.E.; Carl S. Pates, P.E.; Timothy J. Duffy; David K. O'Flynn, P.E.; Roberto Mata, P.E.; Peter Brunsgaard, P.E.; Stephen King, P.E.; Charles E. Rozier, L.S.; David Alcorn, P.E.; Macon Smith, Architect; K. M. Klaber; Anonymous; James Collins, P.E.; Joe Brown; Raymond A. Frost, LS; Cliff Conner; Jeffrey C. Head, P.E.; James L. Getaz, III, P.E.; Chris Hamilton, P.E.; Rick Vollmer, P.E.; William A. Fox, P.E.; David Duerr, P.E.; James Bates, RA; S. G. Papadopoulos, P.E.; Thomas Trenkle, P.E.; Dan R. Brooks, P.E.; Herbert G. Zeller, RA; Ken Peterson; Carl L. Sisemore, P.E.; Byron Dickson, Architect; David J. Lyles, P.E.; James Campbell, P.E.; William Boyd; Sushil Nagpaul; William P. Gimbel, LS; Dennis Hall, LS; Jerry Dixon; Rod Smith, P.E.; Joseph Fuentes; Mark Stevenson; A. S. McGraw, II, P.E.; William L. Bush, P.E.; Steven Giannino; Marshall E. Caudle, RA; Gene Mach; T. Varnum, P.E.; Harry R. Abendroth; Anonymous; Anonymous; Gerald Friedel, P.E.; Ray Schneider; Clinton E. Kisner, Architect; Timothy M. Tilley, P.E.; Richard D. Martin, Architect; Robert Schemmerling, P.E.; Roy Waugh; Daniel H. Davis, P.E.; Jonathan Adams, P.E.; Harley E. Joseph, Jr., P.E.; Tin Nguyen; Harvey Beckham; Mark Brinkerhoff, RA; Yao Q. Lu; Michael A. Grigsby; Will Roberts, P.E.; Robert R. Daniels, P.E.; Brad Payne; Christopher Meehan, P.E.; Mark Woodward; James Kainec; Brian F. Cleary, P.E.; Anonymous P.E.; John Miles; Steve Zellner; Valery Tsimmerman, P.E.; Anonymous; Gary Moline, P.E.; Robert Boucheron, Architect; Douglas Potts, SIT; Don Rainey; Ralph V. Locurcio, P.E.; Gregory Cross, P.E.; Mike Paoli, P.E.; Robert Osborne; Russell J. Neithammer; Mark J. Wenger; Daniel Mullins, P.E.; Kevin Bingley, P.E.; Jack L. Eden, P.E.; Michael A. Bohlmann, P.E.; William Jones; Beida Xie; Dave S.; Robert Eure; Ion Stanciu; William W. Hays, III; Jeffrey Tubello; Robert Floersheim; Lawrence Lussier, P.E.; Charlie Kubic, P.E.; Stephen Rodgers, P.E.; Douglas A. Campbell, P.E.; Al Snyder, P.E.; Brian W. Russell, P.E.; John J. Muller, P.E.; Sean Brady, P.E.; Tim Hayes, P.E.; John F. Kolb, P.E.; Maurice Najarian, P.E.; Jeff Hinson; Anonymous; Hilary Spencer; Clyde W.</p>	
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<p>Bragg, Jr., P.E.; Mark S. Jones; Lindy R. Bryant, P.E.; Greg Kemp; Cody Francis, P.E.; Janet P. Procida, Architect; Pete Aitcheson; Dennis P. Murtland, P.E.; Terry Watson, P.E.; Robert Brown; Harold Seelig, P.E.; Jason Wright, RA; Ronald Lee White, RA; Frederick Clapp; Del J. Ventruella, P.E.; Allen Smith; Ronnie Trout; Donald H. Jones, Jr., P.E.; Jay Rule; Wendell A. Trivette, P.E.; J. Robert Blawas; Albert Genetti; Dan Friedman; Patrick W. Collins, RA; Ziba Parsa; Jennifer Gibbs, P.E.; Thomas B. Leiby, P.E.; Richard A. Loftis; Grier Fleischauer, P.E.; Paul Kidd; David J. Van Patten, P.E.; Greg Budnick, P.E.; Thomas Buford; Thomas E. Richards, P.E.; Reinhard O'Neill; Thomas Carcaterra, P.E.; Arnold Guevara; Katherine Garstang, Architect; Charles Rich; Andrew Kestner; Rosemary F. Owens, P.E.; T. Timm, P.E.; Joseph E. Suhoski, P.E.; Martin Stakes Lane, P.E.; John S. Duckworth, P.E.; Monte Lewis; Blackwell Engineering; Norman James Willis, Architect; John Ryan, P.E.; Keith Scott; James E. Wirkner, P.E.; Paul S. Muller, P.E.; Peter Collis, P.E.; Steven M. McLain, P.E.; Louis Robbins, P.E.; James R. Scavone; James Kern, P.E.; Bill Pearson, P.E.; Russell Deane, P.E.; Benjamin Tritt; Avis Stanley; Chris Campbell; Klaus J. Worrell, P.E.; Sean Cantrell; Anonymous LS; Jerry B. Robertson, P.E.; L. P. Delaney, RA; Neil E. Bristow; Charles Yarbrough; Gary K. Rogers, P.E.; John Gartland, RA; Matthew L. Rush, P.E.; John Parris; Zan Cartwright, Architect; Robert C. Leary; John R. Anderson, P.E.; John R. Julian; Eric Krupacs, P.E.; David A. McDaniel, P.E.; Dan Mason, P.E.; John E. Pandolf, P.E.; Elizabeth Easter, P.E.; Peter J. Rayna, P.E.; Walter Legg, P.E.; Robert D. Prince, P.E.; Frank Salzano, P.E.; Reid Church; James Williams, P.E.; L. Baxter Lawrence, Architect; Eric W. Inman; Jack MacDonald, Architect; Joseph W. Mulholland; David C. Smith; Mike Stevens, Architect; Rupert Chandler, P.E.; J. Albert Rolston, P.E.; Robert Tempest, P.E.; Ron Kedzierski, P.E.; John Moore, Architect; Carlyle Brady; James L. Patton, P.E.; Sean Brady, P.E.; Steve Sill; Anthony Basile; Nick Alten, P.E.; Thomas Graham, RA; Anonymous; Dave Turner; Samuel Hepford; Brian Clapp, P.E.; Uday Kari; Rudi J. van Leeuwen, P.E.;</p>	
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	Robert Moore, P.E.; Loren D. Raap, P.E.; Phillip Garber, P.E.; Darryl Hampton; Robert Prior; Roger Morgan; Jim Plowden; Rick Schoenthaler; Brian W. Caro; Jeffrey Zehner; Anonymous P.E.; Gerald H. Crowther, P.E.; William A. Blackwell, P.E.; Michael S. Abbott, P.E.; Steve K. Yates, P.E.; Chad Clothower; James C. Owens, P.E.	
2		The aforementioned commentors request an "Emeritus" Status be added to the proposed regulations, which would allow them to continue to use their professional title while retired.
	Guy A. Sadler; Q. G. Gennaro; Glenn G. Jenkins, P.E.; Walter J. Ramsey; Darrell S. Larsen, P.E.; David W. Rudy, P.E.; William Hoge, P.E.; Robert A. Kinsey; William (Bill) Sikes; B. Meredith Winn, Jr., P.E.; Salvatore J. Vitale, Jr., P.E.; C. D. Cobb, P.E.; Gina Dubbe; George W. Moore, Jr., P.E.; Nelson Burks; Harry B. Adreon; Otto H. Hartenstein, RA; Hugh Gouldman; R. Bradley Chewning, P.E.; Vince Renaud	The Virginia APELSCIDLA Board does not have a retired or inactive license status. Section 54.1-405 Regulants already have the ability to use their professional title while retired. Although you cannot practice with an expired license, a license is valid during the life of the holder until revoked or suspended by the Board. A license holder must register with the Board to practice in the Commonwealth.
3		The aforementioned commentors are in support of the Proposed Continuing Education regulations.
	David Dent; Craig S. Moore; Frank R. Richardson; Morgan Hurley; Michael W. Hoover, L.S.; Kenneth R. Stock; Steven A. Jones, P.E.; Karl Lahm, P.E.; Joel Edillon, P.E.; Mark Taylor; John Roberts, L.S.; Siddharth Shah, P.E.; Thomas F. O'Kane, Jr.; John Ozmore; Gary Simpson, L.S.; Robin Neff, P.E.; Nickie D. Mills, P.E.; Jerome Hall, P.E.; Dennis W. Heuer, P.E.; David W. Clark; Jeffrey Smeraldo, L.S.; Paul deC. Holt, Jr., L.S.; Troy D. Williams, L.S.; Richard Fralin, L.S.; Brent Evans, L.S.; Peter Skaredoff, P.E.; A. Sidney Roberts, Jr., P.E.; Donald Caskie; Will Nash, L.S.; Mark Perry, LSIT; Dale Otterness, P.E.; Doug Richmond; Matthew Hilbush,; David A. Bockian; Curtis R. Jennings, Jr.; Leslie S. Vincent, P.E.; Paul Cimaglia, P.E.; Mohamed Kadasi, P.E.; Chuck Fleming, P.E.; André J. Perrin; Steve Herzog; John Boyd, P.E.; Edward C. Bishop, P.E.; American Institute of Architects; Joshua W. Elvove, P.E.; Douglas Richmond; Craig D. Perl, P.E.; Daniel Gradishar, P.E.; Daniel E. Mossien, RA; Matt Pesce; G. Christian Guvernator, IV; Jeffrey S. LaPierre, P.E.; Anonymous L.S.; Craig Weaver, P.E.; Paul	The Board concurs with these commentors.

	Crumpler, P.E.; Chris Capozzi, L.S.; Frank R.; Sam Kirby, P.E.; Frank Richardson	
4		In support of the proposed continuing education regulations; however, believes there should be exceptions for those regulants living outside of the Commonwealth of Virginia
	Guy A. Sadler; Ersin Kasirga; S. Frank Szymkowski, P.E.	The law does not provide an exemption for licensees living outside of Virginia. As the Board is not pre-approving courses, licensees have the flexibility to meet their continuing education requirements by various methods of instruction and a variety of courses.
5		There should be exceptions for those licensees who are disabled so that they may maintain their license in case they are required to or wish to return to work at a future date
	Q. G. Gennaro	If you can not renew, we have reinstatement which would include continuing education at that time. 18 VAC 10-20-687 of the proposed regulations (pursuant to §54.1-404.2 of the Code of Virginia, as amended), which states in part, the board may grant exemptions or waive or reduce the number of continuing education activities required in cases of certified illness or undue hardship. However, such exemptions, waivers, or reductions shall not relieve the individual of their obligation to comply with any other requirements of this chapter....
6		There should be an allowance of 24 months (instead of the proposed 12 months) after the effective date of the regulations for regulants to obtain the 16 hours of required education; states there should be an allowance for credit when a regulant is issued a patent as patents require much research of technical data; and feels that the definition for “discipline” or “sanction” should be made clearer when reading the regulations
	Glenn G. Jenkins, P.E.; Ted Rappaport, P.E.; Arthur M. Valente, Architect	The law was passed over two years ago in 2006. Licensees were initially notified via post card by U.S. mail in March 2008. The proposed regulations are still not in effect and once the regulations are promulgated, licensees will again be notified via post card. Additionally proposed regulation 18 VAC 10-20-683. A. allows for a twelve month delayed enactment clause.
7		There should be exemptions within the proposed regulations for those not involved in mainstream engineering where the health

		and safety of the public is not at risk
	Walter J. Ramsey	The Virginia APELSCIDLA Board does not license engineers by discipline; therefore, the regulations pertain to all licensees.
8		There should be an allowance made for regulants who initiate self study techniques which affords them the ability to maintain knowledge at minimal cost
	Darrell S. Larsen, P.E.; Debbi LoCicero; William P. Corish, P.E.; Scott C. Flieg, PE; Timothy M. Scruby, PE; Darrell S. Larsen, PE	The proposed regulations do permit self-directed continuing education activities as outlined in 18 VAC 10-20-683C.5. To be considered, self study would have to meet the requirements as outlined under self-directed continuing education activity.
9		Regulants should have the ability to put their license on "inactive status" for the purpose of maintaining licensure while not practicing
	Gina Dubbe; Vince Renauld; James N. Michel, P.E.; Kurt J. Heinz, P.E.; Todd West; Shawn Saunders; Robert H. White, PE; Q. G. Gennaro; Cathy Roth; D. B. Darling, PE; William Irby, PE	According to §54.1-405 of the Code of Virginia, licensees already have the ability to use their professional title while not practicing. Although you cannot practice with an expired license, a license is valid during the life of the holder until revoked or suspended by the Board. A license holder must register with the Board to practice in the Commonwealth.
10		Suggests that Virginia provide the funding for regulants to take the required coursework; Virginia should only be allowed to audit each professional once in their career and regulants with shortfalls found in audits shall be notified via certified letter; inactive status should be allowed; Virginia should publish a list of accredited courses to be published monthly; and teachers, active military, regulants registered in more than one state, regulants with a MS or PhD, Mensa members, and regulants with more than 20 years of experience should be exempt from the proposed regulations
	D. B. Darling, P.E.; Dan Stoddard, P.E.; Patrick Hogenboom; William B. Pott, P.E.; James C. Owens, PE; Ted Achorn	The APELSCIDLA Board is self-funded by regulants fees. In order to provide funding, fees would have to be increased substantially. The regulations pertaining to continuing education, as currently proposed, provide for exemption or waiver only in cases of certified illness or undue hardship (18 VAC 1-20--687).
11		Requirements should be standardized and compatible with other states requirements; Virginia should wave the requirement for regulants who have met their "home" state requirements; regulants should be allowed to average credit hours from year to year;

		and CE transcripts from national professional organizations should be accepted
	Phillip D. Ozell; Glen Anders; Stephen G. Kopach, L.S.; Erich B. Strong; Thomas Wayne Harding, P.E.; Vincent Riccobono, PE; John Hamilton	The regulations as proposed do not preclude acceptance of continuing education credit hours from sponsors outside the Commonwealth so long as the continuing education meets the standards outlined in 18 VAC 10-20-683.
12		Credits need to be extended for membership in engineering societies and subscriptions to technical magazines which would limit the need to attend seminars and would provide credit for reading and research done on a daily basis
	Miles M. Potter	The proposed regulations allow the granting of credit for the initial development or substantial updating of a continuing education activity or initial teaching of a course which otherwise meets the requirements as outlined in 18 VAC 10-20-683.e. The board committee considered activities such as the ones mentioned above, however ultimately decided not to accept all such activities as not all of the above are educational.
13		Requirements should be compatible, and in line with other states requirements; each state should accept all courses eligible in other states
	Jeffrey Roberts, P.E.; Robert P. Sutton, P.E.; Brady E. Todd, P.S.; Dennis Tignor, P.E.; Richard A. Rader; Jonathan Trail, P.E.; Frank H. Annessi, P.E.; Lloyd English, L.S. & P.E.; Thomas Storrs; Mirali Mirtaghavi; Kelly Beard-Tittone; Bruce Houser, P.E.; Ray Ullrich; William C. Douty, P.E.; Robert H. Midkiff, Jr.; Scott Richards, P.E.; Jitendra B. Singh; J. Paul Davis, P.E.; Kenneth R. Stock; Steven A. Jones, PE; Karl Lahm, PE; Mark Taylor; John Roberts, LS; Dennis W. Heuer, PE; David W. Clark; Paul deC. Holt Jr., LS; Jeffery Smeraldo, LS; Scott C. Flieg, PE; Daniel H. Davis, PE; Bruce Zimmerman; Robert F. Hynes, PE; David Rasnick; Ed Harris; John M. McConaghy, PE; Walter Tuttle	The proposed regulations do not preclude acceptance of continuing education from other states as long as the requirements of 18 VAC 10-20-683 are met.
14		Regulants age 65 and older should have a grandfather clause exempting them from the proposed requirements
	J. Calvin Holcombe, Architect; Jerome S. Johnson, P.E.; Robert Hines; Jay Maji, PE; James Kyle; Ralph A. Thompson, PE; Shawn Saunders; Guy A. Sadler, Architect; Dennis Merida; Gordon S. Quesenberry;	The Virginia APELSCIDLA Board does not have a retired or inactive license status. §54.1-405 of the Code of Virginia provides licensees with the ability to use their professional title while retired. Although you

	Antonio P. Ballestero, PE; Bernard C. Voyten Jr., PE; Mario B. Ginnetti; James S. Taylor; Bill McHale, PE; Greg Knight; Edward De Santis, PE; Norman J. Cohen; William Sykes; Vince Renaud	cannot practice with an expired license, a license is valid during the life of the holder until revoked or suspended by the Board. A license holder must register with the Board to practice in the Commonwealth.
15		Imposes a great financial burden which will not be paid by employers; requirements should be in line with other states; and regulants should not be required to submit documentation for CE upon renewal a certification from the professional should be sufficient
	Larry Stearns; Emil Matula	Documentation does not have to be provided upon renewal. The licensee only has to certify compliance. Documentation will only need to be provided to the board if the licensee is selected for a random audit. Furthermore, please note proposed regulation 18 VAC 10-20-680.A reads in part, "individual license holders applying for reinstatement are required to provide evidence of compliance with the continuing education requirements as contained in this chapter."
16		Should not have to attend a course in a university or college to qualify for CE credit
	Bahram Jamei	The proposed regulations do not limit licensees to university or college classroom courses.
17		Proposed regulations should be written more clearly to explain what is acceptable outside of taking a course of study; maybe should model Virginia regulation after Florida
	Donald J. Liberatore, P.E.	The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods and courses as long as the coursework meets the regulations of 18 VAC 10-20-683.
18		If studies are required, the requirement should be that studies are to be technical in nature in order to keep up with the profession; also Virginia should provide the funding for the courses
	Michael L. Stallard, P.E.	Pursuant to regulation 18 VAC 10-20-683 C. 1. which states in part activities must be related to practice of the profession of the license being renewed, have a clear purpose and objective which will maintain, improve, or expand the skills and knowledge relevant to the licensee's area of practice.... The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a

		variety of methods and courses as long as the coursework meets the regulations of 18 VAC 10-20-683.
19		Classes should be pre-approved and structured
	Roy E. Easter; Stephen Know, P.E.; Stephen L. Barcena, L.S.; David Ray Finnell, P.E.; Michael Klemen; R. Wayne Farmer; George Miller, P.E.; Kyle Ivar Winter, P.E.; Gary Simpson, LS; Robin Neff, PE; Darrell S. Larsen II, PE; Mark Perry, SIT; Richard Fralin, LS; Anonymous Surveyor; Frank R.; Charles E. A. Bowles LS; M. E. Duff, Jr., LS; Michael L. Parrish, LS; Bob Farmer; Kevin Wood, LS; Marc D. Doiron, LS	As the Board is not pre-approving courses, licensees who are located not only in Virginia but worldwide, have the flexibility to meet their continuing education requirements through courses available to them regardless of their geographical location.
20		Credit should be given for the following activities: 1) attending a professional trade show or EXPO; 2) attending a seminar conducted by a vendor; 3) article or research submission and teaching seminars; 4) independent study using a standard textbook or self-study guide; 5) viewing workshop DVD or Webinars; 6) prepare for and take an exam or quiz that is published in a professional magazine; 7) participate in, conduct, or advise on a pro-bono project; and/or 8) attend a monthly or annual meeting of a professional society
	Albert Masetti; Dean C. Westman; Isam Z. Bandak, P.E.; Phil Ronnerud; James B. Jones	The proposed regulations allow the granting of credit for the initial development or substantial updating of a continuing education activity or initial teaching of a course which otherwise meets the requirements as outlined in 18 VAC 10-20-683.e. The board committee considered activities such as the ones mentioned above, however ultimately decided not to accept all such activities as not all of the above are educational.
21		Regulations should allow for reciprocity or credit for participating in Engineers and Surveyors Institute annual continuing education program
	Weldon Spurling, II	Pursuant to regulation 18 VAC 10-20-683 which states in part activities must be related to practice of the profession of the license being renewed, have a clear purpose and objective which will maintain, improve, or expand the skills and knowledge relevant to the licensee's area of practice....The ESI coursework may be acceptable as long as it meets the requirements of regulation 18 VAC 10-20-683.
22		Course taught for the FE and PE students

		should be counted for CE
	Jaydeb Maji, P.E.	Pursuant to regulation 18 VAC 10-20-683 which states in part activities must be related to practice of the profession of the license being renewed, have a clear purpose and objective which will maintain, improve, or expand the skills and knowledge relevant to the licensee’s area of practice....
23		Term “CEU” should be removed and replaced with “PDH” or “PDC” to describe type of unit to be required
	John Clarke, L.S.; Paul W. Mayne, PE	The law and draft of the regulations do not use the term “CEU” .
24		Cost involved should not be excessive and web-based training would be a nice concept to be approved
	Jeffrey L. Adelman, P.E.; Dean Westman; Anatoly Gregor, PE; Mark Lindsey	As the Board is not pre-approving courses, licensees who are located not only in Virginia but worldwide, have the flexibility to meet their continuing education requirements by various methods of instruction. Pursuant to regulation 18 VAC 10-20-683 C. 1. which states in part activities must be related to practice of the profession of the license being renewed, have a clear purpose and objective which will maintain, improve, or expand the skills and knowledge relevant to the licensee’s area of practice....
25		Courses should be pre-approved; the Board should demonstrate flexibility in approving courses with clear language; and the requirement should only apply to regulants who actively work in fields that directly impact public health and safety; also explain how to determine if a course not listed would be approved
	Marc Kreider, P.E.; Troy D. Williams, LS; Richard Fralin, LS; Brent Evans, LS; Mark Perry, SIT; Dale Otterness, PE	As the Board is not pre-approving courses, licensees who are located not only in Virginia but worldwide, have the flexibility to meet their continuing education requirements by various methods of instruction. Pursuant to regulation 18 VAC 10-20-683 C. 1. which states in part activities must be related to practice of the profession of the license being renewed, have a clear purpose and objective which will maintain, improve, or expand the skills and knowledge relevant to the licensee’s area of practice....
26		Business practices should not be acceptable as continuing education credit as they do not assist in the protection and safety of the public – credit should only be given for subjects which reflect areas required to pass

		the licensing exams
	William A. Stuart, II, P.E.	Proposed regulation 18 VAC 10-20-683.C.1. states, in part, the required continuing education credit hours may be in areas related to business practices including project management, risk management, and ethics, which have demonstrated relevance to the licensee's area of practice as defined in Chapter 4 of Title 54.1 of the Code of Virginia. Courses related to business practices which do not have relevance are not permitted (such as increasing profits).
27		Credit should be allowed for contributions to Codes and Standards and/or educational activities and articles written for educational journals
	William Q. Cellini, Jr.	The proposed regulations allow the granting of credit for the initial development or substantial updating of a continuing education activity or initial teaching of a course which otherwise meets the requirements as outlined in 18 VAC 10-20-683.e.
28		Course acceptance should not be restrictive and Board should be receptive to education courses submitted
	Craig T. Hammer, P.E.	As the Board is not pre-approving courses, licensees have the flexibility to meet their continuing education requirements by various methods of instruction and a variety of courses.
29		The following should be accepted under the proposed regulations: 1) activity under item C 5 e should include time spent by professionals in presentation to students at "Career Day" and the supervision of events such as "Trig Star" or other community services such as Boy Scout Merit Badge instruction; 2) activity should also include review of professional practice rules and regulations – regulants convicted of any non-compliance issue should be required to complete the 16 hours of education and regulants not convicted of any non-compliance issue should only be required to complete 8 hours in a two year renewal period; 3) item C 5 e should allow for 16 hours of CE be equivalent to 1 semester hour of approved college coursework; 4) should include requirements that sponsors of CE activities have sufficient resources to document course completion
	Darryl G. Merchant, J. Dan Kinard, P.E.	As drafted, the proposed regulation does not allow the activities listed in the comment.

		The proposed regulation does not differentiate between non-compliant licensees and those in compliance. All licensees are required to complete 16 hours of continuing education for renewal or reinstatement of their license per §54.1-404.2 of the Code.
30		Training provided by FEMA on the National Incident Management System should be accepted as continuing education as well as other emergency management training
	Randolph W. Bartlett, P.E.	Pursuant to regulation 18 VAC 10-20-683 C. 1. which states in part activities must be related to practice of the profession of the license being renewed, have a clear purpose and objective which will maintain, improve, or expand the skills and knowledge relevant to the licensee’s area of practice....If the training provided by FEMA on the NIMS meets the board’s criteria it would be acceptable.
31		Regulants who serve as expert witnesses only should be exempt – and those who serve as expert witnesses only should be required to complete education limited to a focus on regulatory changes in their specific field(s)
	Harold M. Miller, Jr., P.E.	The proposed regulations do not make provision for those who serve as expert witnesses to be exempt. Licensees who serve as expert witnesses need to be current in order to carry out their responsibilities as an expert witness.
32		AIA documentation should be acceptable of CE; special requirements should not apply to out-of-state residents; and requirement should be 12 hours not 16 hours
	Clark A. Buchner; Cary Gill; Hunter Bristow, RA	Since the Board is not pre-approving courses, licensees who are located not only in Virginia but worldwide, have the flexibility to meet their continuing education requirements by various methods of instruction and courses. Pursuant to regulation 18 VAC 10-20-683 C. 1. which states in part activities must be related to practice of the profession of the license being renewed, have a clear purpose and objective which will maintain, improve, or expand the skills and knowledge relevant to the licensee’s area of practice.... As outlined in Section 54.1-404.2 of the Code of Virginia requires completion of the equivalent of 16 hours per biennium of board approved continuing education activities....
33		Requirement for CE should be less than 16

		hours
	James Davis, P.E.	Section 54.1-404.2 of the Code of Virginia requires the completion of the equivalent of 16 hours per biennium of board approved continuing education activities....
34		Ethics cannot be taught, you either have them or your don't
	Reid Church	The regulations as proposed do not specifically address what types of continuing education activities or courses licensees must complete. Pursuant to regulation 18 VAC 10-20-683 C. 1. which states in part activities must be related to practice of the profession of the license being renewed, have a clear purpose and objective which will maintain, improve, or expand the skills and knowledge relevant to the licensee's area of practice.... Additionally, proposed regulation 18 VAC 10-20-683.C.1. states, in part, the required continuing education credit hours may be in areas related to business practices including project management, risk management, and ethics, which have demonstrated relevance to the licensee's area of practice as defined in Chapter 4 of Title 54.1 of the Code of Virginia.
35		Regulants should not be required to have CE hours on a specific topic
	Michele Schwartz	The regulations as proposed do not specifically address what types of continuing education activities or courses licensees must complete. Pursuant to regulation 18 VAC 10-20-683 C. 1. which states in part activities must be related to practice of the profession of the license being renewed, have a clear purpose and objective which will maintain, improve, or expand the skills and knowledge relevant to the licensee's area of practice.... Additionally, proposed regulation 18 VAC 10-20-683.C.1. states, in part, the required continuing education credit hours may be in areas related to business practices including project management, risk management, and ethics, which have demonstrated relevance to the licensee's area of practice as defined in Chapter 4 of Title 54.1 of the Code of Virginia.
36		A distance learning program sanctioned by the Board should be implemented to keep personal travel costs down
	Robert Hynes	The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework falls within the 18 VAC 10-20-

		683. As the Board is not pre-approving courses, licensees who are located not only in Virginia but worldwide, have the flexibility to meet their continuing education requirements by various methods of instruction and courses.
37		Active participation on a committee should be acceptable CE as well as limited credit for active participation on a related civic Board which should be restricted to only 3 to 4 hours of the 16 hours required; carry-over of hours from renewal period to renewal period should be acceptable
	Andy Zoutewelle; Samuel Rodgers, P.E.	Section 54.1-404.2 of the Code of Virginia requires the completion of the equivalent of 16 hours per biennium of board approved continuing education activities.... The board committee considered activities such as the ones mentioned above, however ultimately decided not to accept all such activities as not all of the above are educational.
38		Environmental presentations offered by the EPA as well as an attendance requirement for college coursework
	Kelly Beard-Tittone	The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods and courses as long as the coursework meets the regulations of 18 VAC 10-20-683.
39		A standard test featuring fundamental and general questions should be sent out to regulants for evidence of required knowledge at renewal periods and to weed out those who are not competent, those who fail the test would have a suspended license until the test is satisfactorily passed; implementation should be 24 months instead of 12 months; estimated costs should factor in the numbers of regulants who will fail to renew their license due to CE requirements
	Barrett J. Short, P.E.	Due to the different professions (professional engineers, architects, and land surveyors) and the specialties within each profession, to develop, administer, and score relevant examinations would require a significant increase in regulants fees as the Board is self-funding. The law was passed over two years ago in 2006. Licensees were initially notified via post card by U.S. mail in March, 2008. The proposed regulations are still not in effect and once the regulations are promulgated, licensees will again be notified via post card. Additionally the proposed regulation 18 VAC 10-20-683. A. allows for a

		twelve month delayed enactment clause.
40		Allow requirements for CE in one discipline to be acceptable for dual license holders
	Gay Rehnback, P.E.	The proposed regulations as drafted do not prohibit acceptance of a continuing education activity for dual credit, as long as the activities meet the board's regulations.
41		Effort should be taken to ensure courses are accredited and relevant to the professionals line of work and Board should identify legitimate sources of acceptable CE credits
	Ken Hall	Since the Board is not pre-approving courses, licensees who are located not only in Virginia but worldwide, have the flexibility to meet their continuing education requirements by various methods of instruction and courses. The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods and courses as long as the coursework meets the regulations of 18 VAC 10-20-683.
42		Course should only be taught by licensed professionals and not by academics who do not know the field; requirements need to clearly state that 16 hours can be fulfilled in a two day 16 hour period
	Hank Berry	Proposed regulation 18 VAC 10-20-683.3. states, in part, course instructors must be competent in the subject being taught, either by education or experience. Additionally, the proposed regulations do not preclude the requirements being met in a two-day period and simply state that individuals are required to complete at least sixteen continuing education credit hours in the biennium.
43		Allow flexibility in taking the course hours and permit on-line, CD, and other forms of self-instruction as well as in-person education; develop a list of pre-approved providers; and allow courses that deal with fundamentals of practice
	Harvey A. Kagan, P.E.; Gregory Flory, PE	Since the Board is not pre-approving courses, licensees who are located not only in Virginia but worldwide, have the flexibility to meet their continuing education requirements by various methods of instruction and courses. The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods and courses as long as the coursework meets the regulations of 18 VAC 10-20-683.

44		Consistency in terms should be used within the proposed regulations (ex: regulant, licensee, and individual are all used to mean the same person)
	Don Hart	To this requirement, regulants are all architects, professional engineers, land surveyors, certified interior designers, and landscape architects as well as firms. Licensees are architects, professional engineers, and land surveyors only. Individuals are people not firms. Continuing education only applies to license holders and the language is specific.
45		For those with dual licenses – only require 16 hours per renewal period (not 16 hours of LS coursework and 16 hours of PE coursework); too large of a cost to all licensees
	Frank B. Caldwell, III	The proposed regulations as drafted do not prohibit acceptance of a continuing education activity for dual credit, as long as the activities meet the board’s regulations.
46		Credit for attending technical seminars should be acceptable CE and CE requirement should be waived for the first license renewal that becomes due within less than the two year period after the final effective date of the regulation
	Mohinder Sharma, P.E.	Credit for attending technical seminars should be acceptable continuing education if it meets the board’s requirements. The law was passed over two years ago in 2006. Licensees were initially notified via post card by U.S. mail in March, 2008. The proposed regulations are still not in effect and once the regulations are promulgated, licensees will again be notified via post card. Additionally the proposed regulation 18 VAC 10-20-683. A. allows for a twelve month delayed enactment clause.
47		Requirements should be 10 hours per year; require that ethics, technical, and legal subjects be taken at least every 4 years; and require that 80% of hours are directly related to ones professional field
	James McKnight	Section 54.1-404.2 of the Code of Virginia, requires completion of the equivalent of 16 hours per biennium of board approved continuing education activities.
48		If a 1 semester college course is worth 15 hours of CE the requirements in the proposed regulations should be 15 hours per renewal period, not 16 hours
	Benjamin D. Tice; Dennis Ray Varney, P.E., L.S.; Rayford B. Smith, P.E.; John	Section 54.1-404.2 of the Code of Virginia, requires completion of the equivalent of 16

	Pataky, L.S.; Roger Goodwin, PE; Tom Shelmerdine; David A. McDaniel, PE; Dan Schleicher, PE	hours per biennium of board approved continuing education activities. College coursework is not the only acceptable coursework.
49		A more global approach to fulfilling the requirements of HB 1054 should be taken, an approach such as the one used at www.PMI.org should be considered
	Bob Coates, P.E.	PMI requires 60 Professional Development Units (PDU) per three year Continuing Certification Requirement cycle. PMI has five categories for PDUs. The regulations as proposed would appear to recognize four of these categories.
50		Presenters of courses in one's field should be accepted as CE credit
	Charles Brunner, P.E.	Pursuant to proposed regulation 18 VAC 10-20-683.5.e. which states, in part, a licensee may be granted credit for the initial development or substantial updating of a continuing education activity or his initial teaching of a course which otherwise meets the requirements of this chapter....
51		Requirement should allow carryover and consideration should be taken to use the language in the EIA
	Kenneth J. Shirely, P.E.; David Loduca, P.E.; Charles M. Watson, Jr., P.E.; Siddharth Shah, PE	Section 54.1-404.2 of the Code of Virginia, requires completion of the equivalent of 16 hours per biennium of board approved continuing education activities. College coursework is not the only acceptable coursework. The EIA is prepared by the Department of Planning and Budget and not the board.
52		The Board should provide a list of pre-approved providers of continuing education; the requirement should explain a regulant's recourse if an audit turns up an unacceptable course therefore not meeting the requirements of 16 hours
	David J. Thomas, P.E.	As the Board is not pre-approving courses, licensees who are located not only in Virginia but worldwide, have the flexibility to meet their continuing education requirements by various methods of instruction and courses. Licensee will be given appropriate due process for any deficiencies found during an audit (see APA and regulation 18 VAC 10-20-683.E).
53		Requirements should be modeled after Arkansas: 2 PDHs for active participation in professional and technical societies (each organization); 1 PDH for each hour of professional development at seminars, and professional or technical presentations; 45

		PDHs for 1 college or unit semester hour of credit received; and 10 PDHs for each published paper, article, or book
	Randy L. Weingart; Morgan Hurley; Greg Budnik, PE	The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework meets the requirements of 18 VAC 10-20-683.
		A group should be created who would review and designate courses as eligible for CE credit
54	Douglas C. Gilman, P.E.	The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements as the coursework meets the requirements of 18 VAC 10-20-683. As the Board is not pre-approving courses, licensees who are located not only in Virginia but worldwide, have the flexibility to meet their continuing education requirements by various methods of instruction and courses.
		Wide latitude on acceptance of courses should be allowed; and a petition process should be implemented to allow professionals in a degree program to either use their existing course work to meet the CE requirement or waive the CE requirement until the degree program is completed
55	John Thompson	The proposed regulations do not preclude acceptance of course work from degree programs so long as the coursework meets the requirements of, regulation 18 VAC 10-20-683.
		The proposed requirements should clearly state who needs to complete CE and who does not; "holes" within the requirements need to be filled as to who has to complete the requirements and who is exempt
56	Anonymous	Regulation 18 VAC 10-20-683.A. states, "Individuals whose licenses expire, or apply to reinstate, after [DATE – 12 months after the effective date of these regulations] shall be required to comply with the continuing education provisions of this chapter."
		16 hours of CE every 2 years is excessive
57	Hunter L. Barnes	Section 54.1-404.2 of the Code of Virginia, requires completion of the equivalent of 16 hours per biennium of board approved continuing education activities.
		Work experience should be acceptable CE credit so that non-practicing professional are the ones targeted by the requirement
58	Jen Burrell; Joseph F. Iaquinto, PE	Section 54.1-404.2 of the Code of Virginia

		requires continuing education in order to renew a license. The board's regulations do not differentiate between active and non-practicing licensees.
59		The following should be acceptable ways to achieve CE credit: in-house training sessions through one's employer, lunch and learns, attendance to society meetings which include training, and rep training. As well as web-based training, personal reading, and informal training
	Douglas Henderson, P.E.; Milford Brinton, P.E.; Brian Weaver, PE, Ted Rappaport, P.E.	The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods and courses as long as the coursework meets the regulations of 18 VAC 10-20-683. The board committee considered activities such as the ones mentioned above, however ultimately decided not to accept all such activities as not all of the above are educational.
60		Some questions to be answered: will there be anything required of the sponsors? And how long is a sponsor organization to keep records of attendance for auditing purposes
	Debra L. Brand	The board has no authority over sponsors; it is up to the licensee to ensure the coursework meets the board's requirements and obtain proof of completion.
61		Courses in ethics should be a mandatory requirement every 5 years and courses that acquaint professionals with project review procedures
	James Stangenberg	The regulations as proposed do not specifically address what types of continuing education activities or courses licensees must complete. Regulation 18 VAC 10-20-683 C. 1. states in part activities must be related to practice of the profession of the license being renewed, have a clear purpose and objective which will maintain, improve, or expand the skills and knowledge relevant to the licensee's area of practice.... Additionally, proposed regulation 18 VAC 10-20-683.C.1. states, in part, the required continuing education credit hours may be in areas related to business practices including project management, risk management, and ethics, which have demonstrated relevance to the licensee's area of practice as defined in Chapter 4 of Title 54.1 of the Code of Virginia.
62		A broad spectrum of activities should be considered when determining what course

		meet the requirements; allow credit for attendance at professional seminars/workshops/symposia, and rotational assignments which amount to on-the-job training; the Board should institute its own web-based continuous learning modules which would be accepted as CE credit
	Donald Jacobson, P.E.; Carey Johnston	The proposed regulations do not specifically address the topics or subject matter of the continuing education activities. However, proposed regulation 18 VAC 10-20-683.C.1., states in part, activities must be related to practice of the profession of the license being renewed, have a clear purpose and objective which will maintain, improve, or expand the skills and knowledge relevant to the licensee's area of practice.... Additionally, pursuant to proposed regulation 18 VAC 10-20-683.5.b., which reads in part, the sponsor of the continuing education activity must have predetermined the number of continuing education credit hours that an activity shall take to complete.... To develop, administer, and score course work would require a significant increase in regulants fees as the Board is self-funded.
63		Instructor qualifications, minimum standards, and course requirements should be stated in the requirements
	Bruce A. Tschantz, P.E.	Minimum standards and coursework requirements are contained in 18 VAC 10-20-683. Instructor qualifications are contained in 18 VAC 10-20-683.C.3.
64		Business practices should be broadened to include leadership, communication, claims avoidance, and succession planning; curriculum section should give further guidance as to what a curriculum should include; standards and procedures for approval should be more clearly stated as to what is acceptable forms of CE credit; methods of instruction should be consistent with the purpose and objective and include standard classroom setting, on-line learning, professional conferences, university and college courses as acceptable methods
	Eileen M. Leininger, P.E.	Proposed regulation 18 VAC 10-20-683.C.1. states, in part, the required continuing education credit hours may be in areas related to business practices including project management, risk management, and ethics, which have demonstrated relevance to the licensee's area of practice as defined in Chapter 4 of Title 54.1 of the Code of

		Virginia. Courses related to business practices which do not have relevance are not permitted (such as increasing profits).
65		Economic analysis grossly underestimates the total cost of this regulation by ignoring the impact on firms; the proposal creates a hardship on professionals whose license expires 12 months after the implementation of the requirements – the phase in should be 12 to 24 months after the effective date of the regulations to only require 8 hours and 24 months after implementation the full 16 hours would be required; the CE hours should also be interchangeable for dual license holders
	Paul A. Sweet, Architect, P.E.	Section 54.1-404.2 of the Code of Virginia, requires completion of the equivalent of 16 hours per biennium of board approved continuing education activities. The law was passed over two years ago in 2006. Licensees were initially notified via post card by U.S. mail in March, 2008. The proposed regulations are still not in effect and once the regulations are promulgated, licensees will again be notified via post card. Additionally the proposed regulation 18 VAC 10-20-683. A. allows for a twelve month delayed enactment clause. The proposed regulations as drafted do not prohibit acceptance of a continuing education activity for dual credit, as long as the activities meet the board's regulations.
66		The Board allows certified Landscape Architects to practice some engineering; CLAs should be required to complete CEUs in areas of overlap. ABET programs do not require instructors teaching architecture, engineering, or surveying to be duly licensed; therefore, "competent in the subject being taught" implies course instructors are licensed. How will the Board handle a course defined by ASCE? No CE credit shall be given for a college credit unless the credit has an evaluation and the participant received a satisfactory grade. Updating of course content shall be prorated to match the percentage of updates introduced. CE credit shall be given for authoring, editing, or reviewing publications; serving as an advisor, committee member; membership in a professional organization or technical committee. Exceptions for those who are audited. Carryover of CE credits. Consideration of professors learning new technology and submission of papers,

		<p>being a member of a professional organization, creation of courses, reading articles submitted by professional organizations, advisors on thesis and dissertations. Also require certain number of credits dealing with the regulations. ASCE workshop CEU conversions</p>
	<p>Craig Moore</p>	<p>The law and proposed regulations do not address continuing education activities for those individuals who are not licensed (certified landscape architects are certified; not licensed). The phrase “competent in the subject being taught” does not imply instructors are licensed; proposed regulation 18 VAC 10-20-683.C.3., continues that competency will be by “education or experience.” Regulation 18 VAC 10-20-683.C.5.c. states in part, one semester credit hour of approved college credit shall equal 15 continuing education credit hours....18 VAC 10-20-683.C.5.e. states in part, a licensee may be granted credit for the initial development or substantial updating of a continuing education activity or his initial teaching of a course which otherwise meets the requirements of this chapter at twice the amount of credit that students of the course or activity would receive....Proposed regulation 18 VAC 10-20-683. E. which states notwithstanding the provisions of 18 VAC 10-20-683.D., continuing education activities during a licensing renewal cycle to satisfy the continuing education requirements of the preceding licensing renewal cycle shall be valid only for that preceding license renewal cycle and shall not be accepted for any subsequent renewal cycles or reinstatement. Regulation 18 VAC 10-20-683C. 5 of the proposed regulations states in part that continuing education activity must have predetermined the number of continuing education credit hours that an activity shall take to complete. For self-directed continuing education activity, there must be an assessment by the sponsor at the conclusion of the activity to verify that the individual has achieved the purpose and objective of the continuing education activity; credit will not be awarded if the individual has not successfully achieved the purpose and objective of the continuing education activity based upon the results of the assessment. The proposed regulations do not specifically address the topics or subject matter of the continuing</p>

		education activities. However, proposed regulation 18 VAC 10-20-683.C.1., states in part, activities must be related to practice of the profession of the license being renewed, have a clear purpose and objective which will maintain, improve, or expand the skills and knowledge relevant to the licensee's area of practice....
67		Firms with fewer than two licensed professionals should be exempt from the requirement.
	Ronald A. Quinn, Architect	Section 54.1-404.2 of the Code of Virginia requires completion of at least sixteen continuing education credit hours of board-approved continuing education activities for any license renewal or reinstatement regardless of the number of people in a firm.
68		Have a board liaison to contact to determine if a course is approved and that the proposed CEUs meet the board's requirements.
	David Dent	As the Board is not pre-approving courses, licensees who are located not only in Virginia but worldwide, have the flexibility to meet their continuing education requirements by various methods of instruction and courses. Board staff is always available to provide guidance and added information will be provided on the board's website.
69		Conditionally extend a valid license if credits are rejected by the Board and have a formal appeal process in place.
	Michael W. Hoover, LS	As the Board is not pre-approving courses, licensees who are located not only in Virginia but worldwide, have the flexibility to meet their continuing education requirements by various methods of instruction and courses. Licensee will be given appropriate due process for any deficiencies found during an audit (see APA and regulation 18 VAC 10-20-683.E).
70		Work requires extensive travel outside the US. This curtails time for attending CE courses.
	Joel Edillon, PE	The law does not provide an exemption for licensees living outside of Virginia. As the Board is not pre-approving courses, licensees have the flexibility to meet their continuing education requirements by various methods of instruction and courses.
71		Consult agencies for the different professions involved, create guidelines, and enforce them.
	John Ozmore	Comments were provided by VSPE, ACEC –

		<p>Virginia, and VSAIA during the development of the proposed regulations. Proposed regulation 18 VAC 10-20-683 addresses the guidelines for complying with the continuing education requirements. 18 VAC 10-20-790 discusses the sanctions that may be imposed for failure to comply.</p>
		<p>Allow individuals to further their own education, pursue education that benefits their expertise in specific areas, minimize expense, minimize reporting requirements, allow carryover, provide consistency with requirements in other states, and consider the administrative and financial burden of any new government responsibilities.</p>
<p>72</p>	<p>Nickie D. Mills, PE</p>	<p>As the Board is not pre-approving courses, licensees who are located not only in Virginia but worldwide, have the flexibility to meet their continuing education requirements by various methods of instruction. Pursuant to regulation 18 VAC 10-20-683 C. 1. which states in part activities must be related to practice of the profession of the license being renewed, have a clear purpose and objective which will maintain, improve, or expand the skills and knowledge relevant to the licensee's area of practice.... Pursuant to proposed regulation 18 VAC 10-20-683.G. states periodically, the board may conduct a random audit of its licensees who have applied for renewal to determine compliance. Licensees who are selected for audit shall provide all documentation of all continuing education activities utilized to renew their license within 21 calendar days of receiving notification of audit. However, pursuant to 18 VAC 10-20-683.D.2. Individuals shall maintain records of completion of continuing education activities that comply with the requirements of this chapter for three years from the date of expiration of the license for which the continuing education activities are being used to renew the license. Individuals shall provide such records to the board or its duly authorized agents upon request. Proposed regulation 18 VAC 10-20-683. E. which states notwithstanding the provisions of 18 VAC 10-20-683.D., continuing education activities during a licensing renewal cycle to satisfy the continuing education requirements of the preceding licensing renewal cycle shall be valid only for that preceding license renewal cycle and shall</p>

		not be accepted for any subsequent renewal cycles or reinstatement.
73		Have close cooperation between state societies and have the board pre-approve courses. Should have credit or exemption given to those taking college courses directly related to their field.
	Jeffery Smeraldo, LS	As the Board is not pre-approving courses, licensees who are located not only in Virginia but worldwide, have the flexibility to meet their continuing education requirements by various methods of instruction and courses. The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework meets the requirements of 18 VAC 10-20-683.
74		Follow the NSPE Code of Ethics statement (III.8.e) which states, in part, "...by engaging in professional practice, participating in continuing education courses, reading the technical literature, and attending professional meetings and seminars."
	Jerome Hall, PE	The proposed regulations allow the granting of credit for the initial development or substantial updating of a continuing education activity or initial teaching of a course which otherwise meets the requirements as outlined in 18 VAC 10-20-683.e. The board committee considered activities such as the ones mentioned above, however ultimately decided not all of the activities would meet the requirements.
75		Not in favor of pre-approval of courses as it is restrictive and limiting.
	Douglas Richmond	As the Board is not pre-approving courses, licensees who are located not only in Virginia but worldwide, have the flexibility to meet their continuing education requirements by various methods of instruction. The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework falls within the proposed regulation 18 VAC 10-20-683.C.1.
76		The equivalent of one full day per renewal period, or 8 PDHs, is sufficient and will avoid burdening the professional.
	Matthew Hillbush	Section 54.1-404.2 of the Code of Virginia, requires completion of the equivalent of 16 hours per biennium of board approved continuing education activities.
77		Please consider ex-patriot engineers with

		special constraints in enacting this policy.
	Lillian Pfluke, PE	As the Board is not pre-approving courses, licensees who are located not only in Virginia but worldwide, have the flexibility to meet their continuing education requirements by various methods of instruction and courses. The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework falls within the proposed regulation 18 VAC 10-20-683.C.1.
		Pre-approval of courses, also in favor of some exemptions especially as it relates to military; new professionals; physical disability, illness, or other extenuating circumstances; "inactive" licensees.
78	Will Nash, LS	As the Board is not pre-approving courses, licensees who are located not only in Virginia but worldwide, have the flexibility to meet their continuing education requirements by various methods of instruction and courses. The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework falls within the proposed regulation 18 VAC 10-20-683.C.1. 18 VAC 10-20-687 of the proposed regulations pursuant states in part, the board may grant exemptions or waive or reduce the number of continuing education activities required in cases of certified illness or undue hardship. However such exemptions, waivers, or reductions shall not relieve the individual of their obligation to comply with any other requirements of chapter.... The Virginia APPELSCIDLA Board does not have a retired or inactive license status. § 54.1-405 of the Code of Virginia provides licensees with the ability to use their professional title while retired. Although you cannot practice with an expired license, a license is valid during the life of the holder until revoked or suspended by the Board. A license holder must register with the Board to practice in the Commonwealth.
79		The state take on the process via on-line courses to ensure key safety concerns and most current information is taught. Provide an exception for those willing to certify they will not do any professional work in the State until they meet the CE requirement.

	Joseph Bonometti, PE	Due to the different professions (professional engineers, architects, and land surveyors) and the specialties within each profession, to develop, administer, and score relevant examinations would require a significant increase in licensees fees as the Board is self-funding. The Virginia APESCIDLA Board does not have a retired or inactive license status. A license holder must register with the Board to practice in the Commonwealth.
80		Current engineers should be exempt. CE should only apply to new registrants.
	Frank P. Salzano, PE; Brandon R. Bagwell, PE; David A. McDaniel; Stephen M. Platt, PE, LS; Elizabeth Platt, PE; Robert G. Brooks, PE; Sidney M. Skjei, PE; Norman J. Cohen;	Section 54.1-404.2 of the Code of Virginia, requires completion of the equivalent of 16 hours per biennium of board approved continuing education activities.
81		Regulations should allow credit for 1) actively working in the engineering field 2) authoring/co-authoring papers, books, or presentations 3) serving on technical standards committees 4) attending professional/technical society meetings/conferences. Additionally, delete the requirement to maintain records of completion for three years from the date of expiration of the license. The Board's ability to audit CE requirements should be limited only to active licenses and renewal applications.
	Todd Bockwoldt	The proposed regulations allow the granting of credit for the initial development or substantial updating of a continuing education activity or initial teaching of a course which otherwise meets the requirements as outlined in 18 VAC 10-20-683.e. The board committee considered activities such as the ones mentioned above, however ultimately decided not to accept such activities as not all activities are educational. 18 VAC 10-20-683 requires licensees to maintain records of completion of continuing education activities. Documentation does not have to be provided upon renewal. The licensee only has to certify compliance. Documentation will only need to be provided to the board if the licensee is selected for a random audit.
82		Identify criteria for CE content/subject matter and determining instructor competency. Have advance approval of CEUs. Develop a CE conversion chart for activities such as college courses, correspondence, on-line/televised/other short course tutorials;

		participation in seminars, committees, conventions; design of material, teaching/instructing courses; published papers, articles, etc.; non-traditional opportunities such as mentoring, cross-training, etc. Establish an appeals process if CE is determined to be unacceptable; allow for waivers/exemptions for retirement, active duty, illness/injury, personal hardship.
	Jimmie D. Jenkins, PE	The proposed regulations allow the granting of credit for the initial development or substantial updating of a continuing education activity or initial teaching of a course which otherwise meets the requirements as outlined in 18 VAC 10-20-683.e. The board committee considered activities such as the ones mentioned above, however ultimately decided not to accept such activities as not all activities are educational. Regulation 18 VAC 10-20-683.A through G. addresses content and subject matter of continuing education activities, curriculum, sponsors and instructors, method of instruction, computation of credit, maintenance of documentation of completion, and random audits and compliance. Regulation 18 VAC 10-20-687 addresses exemptions and waivers.
83		Virginia's lack of a CE requirement could be used to refuse comity in other states.
	Peter Skaredoff, PE	The Virginia board has no control over other state licensing boards CE or comity requirements.
84		Take any business classes of our choice and the courses should be pre-approved. Pre-approved courses should include the following: waterline design, computer courses, business management, public speaking, physical fitness, landscaping, soil, architectural, etc. The approved courses should be in any field we deal with, not just our own
	Susan Benson, LSB	As the Board is not pre-approving courses, licensees who are located not only in Virginia but worldwide, have the flexibility to meet their continuing education requirements by various methods of instruction. Pursuant to regulation 18 VAC 10-20-683 C. 1. which states in part activities must be related to practice of the profession of the license being renewed, have a clear purpose and objective which will maintain, improve, or expand the skills and knowledge relevant to the licensee's

		area of practice....The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework falls within the proposed regulation 18 VAC 10-20-683.C.1.
85		State requirement should be 200 hours minimum.
	Anonymous	Section 54.1-404.2 of the Code of Virginia, requires completion of the equivalent of 16 hours per biennium of board approved continuing education activities.
86		I would like to think that a professional in any field would want to upgrade his skills without mandatory education. With the wide variety of continuing education programs available, there is always something of value to every engineer.
	Thomas Wallen, PE	Section 54.1-404.2 of the Code of Virginia, requires completion of the equivalent of 16 hours per biennium of board approved continuing education activities. The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework falls within the proposed regulation 18 VAC 10-20-683.C.1.
87		<p>Problems with the proposed CE:</p> <ul style="list-style-type: none"> - \$18M in training costs annually, with lost productivity and billable hours double that; annual cost to Virginia >\$50M - No standards for formal courses in terms of content or quality - No certification process for instructors - No flexibility for professionals who work for government but do not design or stamp drawings - No self-accreditation for CE through everyday work, reading technical material, and consulting with colleagues - No reciprocity with other states or professional organizations
	Kurt Sisson	An Economic Impact Analysis was prepared by the Department of Planning and Budget. Regulation 18 VAC 10-20-683 C. 1. states in part activities must be related to practice of the profession of the license being renewed, have a clear purpose and objective which will maintain, improve, or expand the skills and knowledge relevant to the licensee's area of practice.... The proposed regulations

		are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework falls within the proposed regulation 18 VAC 10-20-683.C.1. The Virginia board has no control over other state licensing boards CE or comity requirements.
88	Sunil Kabra	The state should produce quality courses and place them on a website with free access for licensees. The state should charge an additional \$50 per renewal period to cover the cost of developing the courses on a continuous basis.
		Due to the different professions (professional engineers, architects, and land surveyors) and the specialties within each profession, to develop, administer, and score relevant examinations would require a significant increase in licensee fees as the Board is self-funding.
89	Mark E. Cacamis	Adopt Alabama's PDH process. Do not adopt Florida's, which requires courses to be certified as well as requiring a course in licensing law every renewal period.
		Upon review of Alabama's PDH process for engineers, it appears there are similarities to Virginia's continuing education requirement. However, Alabama has a more stringent record-keeping requirement, a PDH requirement of 15 hours per year, and discourage acquisition of PDH by distance learning. The proposed Virginia regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework falls within the proposed regulation 18 VAC 10-20-683.
90		There will be no additional burden, so long as board approved CEU in any state are acceptable in Virginia. When each state has CE requirements with independent content, acquisition of CEU specific to each state becomes costly and burdensome. Other means of meeting the requirement outside a classroom such as attending association meetings, authoring publications, speaking at seminars and teaching should be made available.
	Kevin Nelson, LS	The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework falls within the proposed regulation 18 VAC 10-20-683.C.1. The

		proposed regulations allow the granting of credit for the initial development or substantial updating of a continuing education activity or initial teaching of a course which otherwise meets the requirements as outlined in 18 VAC 10-20-683.e. The board committee considered activities such as the ones mentioned above, however ultimately decided not to accept all such activities as not all of the above are educational.
91		<p>Mandatory CE provisions should adhere, at a minimum to the following:</p> <ul style="list-style-type: none"> - Regulations for the number of hours should not exceed those established by the AIA - Regulations must interface, coordinate, and compliment the established reporting/recording procedure used by AIA - Pre-approved courses, as approved and accepted by AIA, should be accepted - No conditions/requirements that conflict, contradict, and/or exceed the AIA requirements should be included - No provision in conflict with any NCARB provision/procedure or with other states jurisdictions, that may restrict licensure reciprocity
	Steve Hinrichs	<p>As outlined in Section 54.1-404.2 of the Code of Virginia, which states in part, such regulations shall require completion of the equivalent of 16 hours per biennium of board approved continuing education activities.... The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework falls within the proposed regulation 18 VAC 10-20-683.C.1. While it is hoped that continuing education activities that meet the criteria established in proposed regulation 18 VAC 10-20-683.C.1. would also meet other state's requirements, the Virginia board has no control over other state licensing boards CE or comity requirements.</p>
92		I support continuing education when offered by NCARB, State Code Agencies, OSHA, and qualified Universities. I do not support CE offered by various "for profit" groups or manufacturers.
	Harold W. Cox, Architect	The proposed regulations are drafted

		broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework falls within the 18 VAC 10-20-683.
93		I would not be against an on-line course for a minimum of 3 CEUs to keep current. This requirement could be on a five-year cycle.
	Willis C. Barrow, PE	The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework meets the requirements of 18 VAC 10-20-683. Section 54.1-404.2 of the Code of Virginia, requires completion of the equivalent of 16 hours per biennium of board approved continuing education activities.
94		I have a concern whether applicable and appropriate CE opportunities will be available and offered at a reasonable cost. How will the board assist sponsors in getting CEUs approved and predetermining credits? <ul style="list-style-type: none"> - A dually licensed individual should complete at least five of the 16 credits in surveying related coursework or activities. - Exemption and waiver to include individuals deployed on active military duty. - Carryover of credits, with a maximum of 16 of the remaining credits carried into the following renewal period. - Consider authoring published papers, articles or books (to be used once and only in the year published); being an officer or active committee member of an engineering or surveying society; attending satellite video courses where attendance is verified and program material meets requirements.
	Amy Wyks	As the Board is not pre-approving courses, licensees have the flexibility to meet their continuing education requirements by various methods of instruction and a variety of courses. The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework meets the requirements of 18 VAC 10-20-683. The regulations as drafted do not prohibit acceptance of a continuing education activity for dual credit, as long as the activities relate to the practice of the profession of the license being renewed, have a clear purpose and objective which will maintain, improve, or expand the skills and knowledge relevant to the licensee's area of practice.... 18 VAC

		<p>10-20-687 states in part, the board may grant exemptions or waive or reduce the number of continuing education activities required in cases of certified illness or undue hardship. Proposed regulation 18 VAC 10-20-683. E. which states notwithstanding the provisions of 18 VAC 10-20-683.D., continuing education activities during a licensing renewal cycle to satisfy the continuing education requirements of the preceding licensing renewal cycle shall be valid only for that preceding license renewal cycle and shall not be accepted for any subsequent renewal cycles or reinstatement. The proposed regulations allow the granting of credit for the initial development or substantial updating of a continuing education activity or initial teaching of a course which otherwise meets the requirements as outlined in 18 VAC 10-20-683.e. The board committee considered activities such as the ones mentioned above, however ultimately decided not to accept all such activities as not all of the above are educational.</p>
<p>95</p>		<p>The Board should have final authority with respect to approval of courses, credit, PDH value, etc.</p> <ul style="list-style-type: none"> - credit for college/community college approved courses will be based upon course credit established by the college - credit for qualifying seminars/workshops; the board should not pre-approve providers or specific courses, each engineer should determine what meets the requirement - credit for active participation in professional and technical societies and require a licensee serve as an officer - teaching credit should be valid <p>Computation of course credit:</p> <ul style="list-style-type: none"> - 1 classroom hour of an ABET accredited college or university = 1 PDH or 3 credit hours for a full semester = 45 PDH (similar computation for the quarter system) - 1 CEU = 10 PDH - 1 hour for attendance in course work, seminars or professional/technical presentations made at meetings, conventions, or conferences = 1 PDH

		<ul style="list-style-type: none"> - PDH credits doubled for teaching Published technical/professional papers, articles or books = 10 PDH
	Chris Lowe, PE	<p>The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework meets the requirements of 18 VAC 10-20-683. Additionally, regulation 18 VAC 10-20-683.A. through C. as proposed addresses content and subject matter, curriculum, sponsors and instructors, methods of instruction, and computation of credit. The proposed regulations allow the granting of credit for the initial development or substantial updating of a continuing education activity or initial teaching of a course which otherwise meets the requirements as outlined in 18 VAC 10-20-683.e. The board committee considered activities such as the ones mentioned above, however ultimately decided not to accept all such activities as not all of the above are educational.</p>
96		<p>Lacking is a clear definition of the nature of activities that will qualify as CE under the regulation. How an entity, especially one not located in Virginia, may be certified as qualified to offer CE activities and what is considered a reasonable charge for one CEU.</p> <p>Examples that should qualify:</p> <ul style="list-style-type: none"> - Attend Transportation Research Board annual meetings held in Washington DC - Attend a meeting of the Virginia Section of the Institute of Transportation Engineers - Attend a meeting of the Virginia Transit Association <p>What procedures will be adopted to obtain board approval of continuing education activities?</p>
	Frank Spielberg, PE	<p>The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework meets the requirements of 18 VAC 10-20-683. As the Board is not pre-approving courses, licensees who are located not only in Virginia but worldwide, have the flexibility to meet their continuing education requirements by various methods of instruction. The proposed regulations allow the granting of credit for the initial</p>

		development or substantial updating of a continuing education activity or initial teaching of a course which otherwise meets the requirements as outlined in 18 VAC 10-20-683.e. The board committee considered activities such as the ones mentioned above, however ultimately decided not to accept all such activities as not all of the above are educational.
97		Exempt CE requirements for those with advanced degrees (Master's, PhD) as do other states.
	Anonymous	Section 54.1-404.2 of the Code of Virginia, requires completion of the equivalent of 16 hours per biennium of board approved continuing education activities....No exemption has been provided for licensees with advanced degrees.
98		I have no problem with CEUs, just the dates for completion. There is no consistency between states. This needs to be worked out with all states to gain a uniform time for credits.
	James C. Buie	Continuing education requirements vary from state to state, as do renewal cycles. The Virginia board has no control over other state licensing boards CE requirements or renewal cycles.
99		Other organizations (CPE, MD) have extensive and well conceived CE programs. If we can learn from their efforts (taking the pro and avoiding the con) I would support our own continuing ed program.
	Michael Stumbaugh	The statutory requirements for the CE programs for the mentioned professions are unique to those professions. The board's continuing education program is based on the requirements contained in Section 54.1-404.2 of the Code of Virginia. In addition, the board considered input from affected constituent groups as well as examining other continuing education programs.
100		Those not notified as part of the exam process be grandfathered and not required to take further courses.
	Doug Bellomo, PE	Section 54.1-404.2 of the Code of Virginia, requires completion of the equivalent of 16 hours per biennium of board approved continuing education activities....The proposed regulations make no provision for grandfathering existing licensees.
101		I would like to see the board address how courses will be credited with more specificity. I recommend the board and staff issue, after some appropriate review period,

		a listing of vendors who provide unacceptable training.
	Brendan M. Burns, PE	The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework meets the requirements of 18 VAC 10-20-683. Further, regulation 18 VAC 10-20-683 addresses content and subject matter, curriculum, sponsors and instructors, methods of instruction, and computation of credit. The board will not be pre-approving or disapproving sponsors/instructors/vendors of training.
		Make sure that the system doesn't place more burdens to the providers than it provides in benefits to the public. I have to participate in CE for several certifications I hold. There should be a vehicle to allow me to apply training from any of them for the Virginia PE requirement. The BiCSi model of submitting a seminar/training for approval should be used. The applicant can submit the agenda, certificate and supporting material documenting the training. There should be no exemptions for educators or anyone based on their discipline or career path.
102	Malcolm Lyle, PE	The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework meets the requirements of 18 VAC 10-20-683. Licensees are only required to submit documentation of all continuing education activities utilized to renew their license if they are selected during a random audit. The statutory requirements for the CE programs for BiCSi is unique to that organization. The board's continuing education program is based on the requirements contained in Section 54.1-404.2 of the Code of Virginia. In addition, the board considered input from affected constituent groups as well as examining other continuing education programs. Regulation 18 VAC 10-20-687 addresses exemptions or waivers for certified illness or undue hardship. No provisions are made for specific disciplines, career paths, or educators.
103		How do you define a sponsor or instructor? Under the proposed regulations, I believe that the ASC – NCS events qualify as continuing education hours.

	Dean C. Westman, PE	Sponsors of continuing education activities must meet the requirements of regulation 18 VAC 10-20-683. Course instructors must be competent in the subject being taught, either by education or experience. ASC-NCS events may qualify if they meet the requirements in regulation 18 VAC 10-20-683.
104		Standards of technical competency must change with time as science and engineering develops advancements. CE must be viewed and designed as it will last in the future without end and be a system that is as dynamic, or more dynamic, than the original licensing test standards. If an engineer feels he or she is obtaining enough technical advancements on the job, let that person take a one or two hour exam to avoid taking a 16 hour CE course.
	John C. Roderique, PE	The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework meets the requirements of 18 VAC 10-20-683. Additionally, regulation 18 VAC 10-20-683.A. through C. as proposed addresses content and subject matter, curriculum, sponsors and instructors, methods of instruction, and computation of credit. Due to the different professions (professional engineers, architects, and land surveyors) and the specialties within each profession, to develop, administer, and score relevant examinations would require a significant increase in regulants fees as the Board is self-funding.
105		Keep the CE necessities up to the Professional to select the time, place and subject commensurate to their individual area of expertise.
	Frank F. Potts Jr., LS	The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework meets the requirements of regulation 18 VAC 10-20-683.
106		How can the Board intelligently expect a "one size fits all" solution to the myriad career paths that a design professional can undertake? The expense of taking CE courses is not insignificant. The Board is remiss in not providing quasi-definitive details regarding the implementation of this regulation. Go back to the drawing board, revise and resubmit.

	Pio F. Masone, PE	The board does not propose a “one size fits all” solution and recognizes the different professions and career paths affected. That is why the regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework meets the requirements of regulation 18 VAC 10-20-683.
107		Long overdue, perhaps now we will smoke out all those Wisconsin & Texas write-in PEs.
	Anonymous	The continuing education requirement should lead to better educated licensees which should thereby increase the protection of the health, safety, and welfare of the public.
108		Request/advise that Virginia not have proprietary CE classes and that we are able to certify that we have met our home state requirements and that the requirements are comparable.
	Richard Galpin, PE	The board does not have propriety continuing education activities. The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods. Upon renewal, licensees will be required to certify they have met Virginia’s continuing education requirements. Continuing education used for your home state may be acceptable in Virginia as long as it meets the requirements of regulation 18 VAC 10-20-683.
109		Give us a chance to be successful with a wide variety of training subjects and formats.
	E. Daryl Merryman, PE	The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework meets the requirements of regulation 18 VAC 10-20-683.
110		CE requirement could be addressed by having associated engineers certify, via use of their stamp in necessary, that the sum total of the regulatory briefing, law updates, ethics training, etc. would constitute 16 hours over the license period.
	Rudolph F. Guercia	Documentation does not have to be provided upon renewal. The licensee only has to certify compliance. Documentation will only need to be provided to the board if the licensee is selected for a random audit. In addition, the proposed regulations are drafted broadly to allow licensees the

		flexibility to meet continuing education requirements through a variety of methods as long as the coursework meets the requirements of regulation 18 VAC 10-20-683. Furthermore, please note proposed regulation 18 VAC 10-20-680.A reads in part, "individual license holders applying for reinstatement are required to provide evidence of compliance with the continuing education requirements as contained in this chapter."
111		Do not compound costs by requiring separate continuing education credits for each state of licensure. NY State requires each professional to maintain a record of the courses attended during each renewal period. These must be available if requested by the board. Look at what other states have done. Don't reinvent the wheel.
	Donald DeWolfe Ehre, PE	The board does not have propriety continuing education activities. The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods. Upon renewal, licensees will be required to certify they have met Virginia's continuing education requirements. Continuing education used for another state may be acceptable in Virginia as long as it meets the requirements of regulation 18 VAC 10-20-683.
112		Accommodations should be written into the requirements to allow for a Professional who through circumstances beyond his control is unable to achieve the 16 hours required during the 2 year registration period.
	Richard C. Elliott, PE	18 VAC 10-20-687 of the proposed regulations pursuant to §54.1-404.2 of the Code of Virginia, states in part, the board may grant exemptions or waive or reduce the number of continuing education activities required in cases of certified illness or undue hardship.
113		Neither internal training opportunities or professional meetings provide CE credits and therefore would not satisfy the requirement. An additional requirement for 16 credits is overly burdensome and unnecessary. The effective date should be no less than two years after the regulation is final.
	Charles Ader, PE	Section 54.1-404.2 of the Code of Virginia, requires completion of the equivalent of 16 hours per biennium of board approved continuing education activities.... The law

		was passed over two years ago in 2006. Licensees were initially notified via post card by U.S. mail in March, 2008. The proposed regulations are still not in effect and once the regulations are promulgated, licensees will again be notified via post card. Additionally the proposed regulation 18 VAC 10-20-683. A. allows for a twelve month delayed enactment clause.
114	John F. Horn	Internet based CE is the most important service. The second is record keeping and agency notification. I would encourage you to use at least these two criteria in allowing which services are allowed to provide CE. Let us not confine this to Virginia based CE firms only.
		The board does not have propriety continuing education activities. As the Board is not pre-approving courses, licensees who are located not only in Virginia but worldwide, have the flexibility to meet their continuing education requirements by various methods of instruction.
115	Steve Kernodle	Any type of continuing education program must be thought about carefully to avoid undue monetary or time strains to the individual. On-line courses offer the future in the best of both worlds. Think in terms of what will benefit the individual and public without putting a significant strain on resources.
		The board does not have propriety continuing education activities. As the Board is not pre-approving courses, licensees who are located not only in Virginia but worldwide, have the flexibility to meet their continuing education requirements by various methods of instruction.
116	John Neal Dalton, PE	Paragraph 18 VAC 10-20-683 C.5.b provides to receive credit the sponsor must predetermine the amount of CE credits. This language may nullify otherwise good CE opportunities. Information exchanged through serving on standards development boards/committees is invaluable but there are no pre-determined CE hours associated with these.
		The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework meets the requirements of regulation 18 VAC 10-20-683. The board committee considered activities such as the one mentioned above, however ultimately

		such an activity cannot be accepted as there are no pre-determined CE hours as required by the regulation.
117		Must have a diverse, yet certifiable means of meeting CE requirements.
	A. Sidney Roberts Jr., PE	The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework meets the requirements of regulation 18 VAC 10-20-683.
118		CE credits should be only for technical subjects directly related to the practice area. To protect the professionalism, we need to be grounded in ethics and current with technology.
	Donald Caskie	The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework meets the requirements of regulation 18 VAC 10-20-683. The continuing education requirement should lead to better educated licensees which should thereby increase the protection of the health, safety, and welfare of the public.
119		Allow manufacturer seminars and equipment demonstrations; allow trade show presentations; allow individual architect/engineer to determine which courses are helpful; allow CE approved in other states where regulant is registered; suspend CE requirement for any year in which Virginia implements new codes or automatically give A/E 8 hours credit when new codes are in effect. Allow multiple hours for any college/community course credit. Any CE requirements should be consistent with neighboring states.
	John W. Ostergren Jr., PE	The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods. Continuing education used for another state may be acceptable in Virginia as long as it meets the requirements of regulation 18 VAC 10-20-683. Section 54.1-404.2 of the Code of Virginia, requires completion of the equivalent of 16 hours per biennium of board approved continuing education activities. No exemption for suspension of continuing education requirements has been provided when there are changes to the Code. Computation of credits is defined in the regulations.

120		Make any requirements state developed, concise (12 hours per year), less costly to acquire (web based and as part of license fee), easily documented, and related to HSW issues only.
	R. H. Edwards	Due to the different professions (professional engineers, architects, and land surveyors) and the specialties within each profession, to develop and administer coursework would require a significant increase in regulants fees as the Board is self-funding. Section 54.1-404.2 of the Code of Virginia, requires completion of the equivalent of 16 hours per biennium of board approved continuing education activities. The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework meets the requirements of regulation 18 VAC 10-20-683. Documentation does not have to be provided upon renewal. The licensee only has to certify compliance. Documentation will only need to be provided to the board if the licensee is selected for a random audit. The continuing education requirement should lead to better educated licensees which should thereby increase the protection of the health, safety, and welfare of the public.
121		Do not mandate CE for professional engineering registration for those who have been registered for a long time. Engineering is too broad to mandate CE
	Chris Klasing	Section 54.1-404.2 of the Code of Virginia, requires completion of the equivalent of 16 hours per biennium of board approved continuing education activities. 18 VAC 10-20-687 of the proposed regulations pursuant to §54.1-404.2 of the Code of Virginia, as amended, which states in part, the board may grant exemptions or waive or reduce the number of continuing education activities required in cases of certified illness or undue hardship.
122		Permit liberal/flexible standards for approved credit, thereby respecting the ability of the licensed professionals to determine what efforts are germane to their work and which endeavors represent productive use of their time.
	R.L.	The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements

		through a variety of methods as long as the coursework meets the requirements of regulation 18 VAC 10-20-683.
123		The Economic Impact Analysis (EIA) is “full of errors.” Salary per hour is “unreal”; current rates are much higher. Travel cost of \$100 per hour should be used. The EIA failed to account for time and office supplies when “selected for audit”. EIA failed to account for the cost to administer, monitor, enforce, and audit the requirement.
	Roger Thiesfeld, PE	The Economic Impact Analysis was prepared by the Department of Planning and Budget.
124		Biennium requirement should have a biennium transition period (individuals should have two years from date of enactment to comply).
	Robert G. Semeisberger, PE	The law was passed in 2006. Licensees were initially notified via post card by U.S. mail in March 2008. The proposed regulations are still not in effect and once the regulations are promulgated, licensees will again be notified via post card. Additionally the proposed regulation 18 VAC 10-20-683. A. allows for a twelve month delayed enactment clause.
125		A full-time Professional (not administrative/secretarial) group that establishes standards for training; organizes training opportunities; rapidly pre-approves training proposed by members; maintains training records; and baselines the current information of licensees.
	James G. O’Neill, PE	As the Board is not pre-approving courses, licensees who are located not only in Virginia but worldwide, have the flexibility to meet their continuing education requirements by various methods of instruction. Due to the different professions (professional engineers, architects, and land surveyors) and the specialties within each profession, to develop, administer, and update coursework and training opportunities would require a significant increase in regulants fees as the Board is self-funded.
126		Require a short refresher on-line test in your field of specialty every five years.
	Stephen Rosen	Due to the different professions (professional engineers, architects, and land surveyors) and the specialties within each profession, to develop, administer, and update examinations would require a significant increase in regulants fees as the

		Board is self-funded.
127		Individual engineers should have an avenue to apply for exclusion based upon their unique circumstances.
	Charles B. Kruse, III, PE	18 VAC 10-20-687 of the proposed regulations pursuant to §54.1-404.2 of the Code of Virginia, as amended, states in part, the board may grant exemptions or waive or reduce the number of continuing education activities required in cases of certified illness or undue hardship.
128		Participation in standards committees or professional society meetings may be the only technically relevant activities. Restrictive and inconsistent language is inconsistent with standards in other states; Virginia will provide an incentive for engineering activities to relocate to other states.
	Dwight Baker, PE	As the Board is not pre-approving courses, licensees who are located not only in Virginia but worldwide, have the flexibility to meet their continuing education requirements by various methods of instruction as long as it meets the requirements of regulation 18 VAC 10-20-683. The board committee considered activities such as the ones mentioned above, however ultimately decided not to accept all such activities as not all of the above are educational.
129		What will constitute a CE credit?
	Anonymous, PE	Computation of credit is defined in regulation 18 VAC 10-20-683.C.5.
130		Without continuing education, will not the reciprocity process between Virginia and other states with CE requirements be in jeopardy?
	Henry Burruss	The continuing education requirement should lead to better educated licensees which should thereby increase the protection of the health, safety, and welfare of the public. Continuing education used for another state may be acceptable in Virginia as long as it meets the requirements of regulation 18 VAC 10-20-683.
131		Facilities engineering consultant to the Owner to supervise the architectural and engineering design work. Separate the engineering and architectural contracts on a project with the architect and engineer from separate firms working directly for the Owner. Have first design done in pencil and paper before computer generation.
	Harry L. Masten, PE	The board is unclear how this relates to the

		public comment period for continuing education.
132		Inclusion of a provision that engineering faculty satisfy the requirement through their regular activities. Department sponsorship of a set of CE classes available on-line at no charge. A licensee developing a class would receive credit at twice the student rate but licensee does not receive credit for subsequent offerings of the class; this does not appear adequate to reflect the effort and understanding. Further it appears the student can receive credit for repeating the same class while the regulation prevents the licensee who teaches the class from receiving credit in the same licensure period.
	Ronald D. Williams, PE	The regulations do not provide for satisfaction of the continuing education requirement through the performance of daily activities. The proposed regulations allow the granting of credit for the initial development or substantial updating of a continuing education activity or initial teaching of a course which otherwise meets the requirements as outlined in 18 VAC 10-20-683. Regulation 18 VAC 10-20-683.C.5.f. as drafted states a licensee will not receive credit for completing the same continuing education activity with the same content more than once during the license period immediately prior to the expiration date of the license for renewal or during the two years immediately prior to the date of receipt of a complete reinstatement application. Due to the different professions (professional engineers, architects, and land surveyors) and the specialties within each profession, to develop, administer, and update coursework and training opportunities would require a significant increase in regulants fees as the Board is self-funded.
133		Courses available and approved by the state prior to the regulation taking effect; a credit for the hours spend in counseling/educating staff and younger professionals; credit for teaching relevant courses without having to attend the course you already teach.
	Tom Nyman, PE	As the Board is not pre-approving courses, licensees who are located not only in Virginia but worldwide, have the flexibility to meet their continuing education requirements by various methods of instruction. After review of activities such as

		the ones mentioned above, the board committee ultimately decided all such activities must meet the requirements of 18 VAC 10-20-683. A licensee may be granted credit for the initial development or substantial updating of a continuing education activity or his initial teaching of a course which otherwise meets the requirements of this chapter at twice the amount of credit that students of the course or activity would receive....
134		Exemption for those not involved in mainstream engineering where the health and safety of the public is not at risk. Consideration of those who are older, near retirement or working part-time.
	Walter J. Ramsey	Regulation 18 VAC 10-20-687 states in part, the board may grant exemptions or waive or reduce the number of continuing education activities required in cases of certified illness or undue hardship. The Virginia APESCIDLA Board does not have a retired or inactive license status. Section 54.1-405 of the Code of Virginia provides regulants with the ability to use their professional title while retired. Although you cannot practice with an expired license, a license is valid during the life of the holder until revoked or suspended by the Board. A license holder must register with the Board to practice in the Commonwealth.
135		May allow Virginia professionals to register via comity in states with PDH requirements.
	Marvin H. Wright, PE	Continuing education requirements vary from state to state. The board has no control over what continuing education activities may be accepted by other states.
136		Boards should require businesses that offer engineering or engineering services records of continuous employment of a suitably licensed engineer "in responsible charge" on a continuous basis within that state jurisdiction. Employers should be suitably and proactively monitored relative to engineering licensing requirements.
	Del J. Ventruella, PE	The board is unclear how this relates to the public comment period for continuing education.
137		DPOR should provide a free on-line CE system
	Y. Wang; Robert Hynes	Due to the different professions (professional engineers, architects, and land surveyors) and the specialties within each profession, to develop, administer, and update coursework and training

		opportunities would require a significant increase in regulants fees as the Board is self-funded.
138		There should be a recognition of an equivalence to the accumulation of Continuing Education Units.
	Jules Cohen, PE	The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework meets the requirements of regulation 18 VAC 10-20-683.
139		Allow AIA credits and other states' comp requirements.
	Frank D. Mileto	The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods. Continuing education used for another state may be acceptable in Virginia as long as it meets the requirements of regulation 18 VAC 10-20-683.
140		On-the-job training should count and record keeping rules amended. The requirements regarding the sponsoring organization to maintain records goes beyond the scope and ability of the organization. Oregon's rules for CE were much better [included excerpt from OSBEELS].
	Darrin Geldert, PE	The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework meets the requirements of regulation 18 VAC 10-20-683. The board has no authority over sponsors; it is up to the licensee to ensure the coursework meets the board's requirements and obtain proof of completion.
141		The regulation is too restrictive on what constitutes a qualifying continuing education experience. Georgia is not as restrictive [included excerpt from George PE Regulations].
	Joseph Dove	The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework meets the requirements of regulation 18 VAC 10-20-683.
142		Postpone the requirement. Include informal study as a substitute for institutional education.
	Mike Greiser, PE	The law was passed in 2006. Licensees were initially notified via post card by U.S.

		<p>mail in March 2008. The proposed regulations are still not in effect and once the regulations are promulgated, licensees will again be notified via post card. Additionally the proposed regulation 18 VAC 10-20-683. A. allows for a twelve month delayed enactment clause. Self-directed continuing education activities must meet the requirements in regulation 18 VAC 10-20-683.</p>
		<p>Proposed rules are vague; more explicit implementation on acceptable education [references the NC Board]. Gradual implementation, such as none for 2009 renewals, half for 2010, and full for 2011 renewals. Allow a limited number of carryover hours [references NC Board]. Exemptions to the CE requirement such as active duty, inactive licensees, etc. [references NC Board]. -683.5 (f) is vague and open to misinterpretation and does not allow credit for new developments that may occur.</p>
143	Thomas A. Westbrook, PE	<p>The law was passed in 2006. Licensees were initially notified via post card by U.S. mail in March, 2008. The proposed regulations are still not in effect and once the regulations are promulgated, licensees will again be notified via post card. Additionally the proposed regulation 18 VAC 10-20-683. A. allows for a twelve month delayed enactment clause. The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework meets the requirements of regulation 18 VAC 10-20-683. The board may grant exemptions or waive or reduce the number of continuing education activities required in cases of certified illness or undue hardship.</p>
144	Karyn Moreland, PE	<p>Be flexible as possible in accepting webinars, mentoring, professional organization meetings, committees and offices held, etc. Give careful consideration to accepting as many different forms of "education" as possible.</p> <p>The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework meets the requirements of regulation 18 VAC 10-20-683. The board committee considered activities such as the ones mentioned above, however ultimately</p>

		decided not to accept all such activities as not all of the above are educational.
145		Required reading in lieu of classes; a review of the significant problems identified in board proceedings that impacted other license holders would be efficient and effective.
	Jack Martin	The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework meets the requirements of regulation 18 VAC 10-20-683. For self-directed continuing education activity, there must be an assessment by the sponsor at the conclusion of the activity to verify that the individual has achieved the purpose and objective of the continuing education activity; credit will not be awarded if the individual has not successfully achieved the purpose and objective of the continuing education activity based upon the results of the assessment.
146		Any CE requirements for Architects and Engineers should be extended to code officials. Would like to see broad alternatives for those not engaged in traditional practice. The state law should not be proprietary to the AIA monopoly.
	Jeremy Fretts	The board has no authority over code officials. The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework meets the requirements of regulation 18 VAC 10-20-683.
147		Holding an elective office in an active professional society or appointment to a board, committee, or commission by a Virginia state official should count as equivalent to 8 hours of CE. Attendance at a technical conference should count as 8 hours of CE for every two days of attendance.
	C. Flint Webb, PE	The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework meets the requirements of regulation 18 VAC 10-20-683. The board committee considered activities such as the ones mentioned above, however ultimately decided not to accept such activities as not all of the above are educational. Attendance at technical conferences may be acceptable

		provided it meets the requirements of regulation 18 VAC 10-20-683.
148		Any differences in amounts or reporting requirements from those established by AIA would be burdensome. Other states accept the AIA transcripts as acceptable reports; we urge the board to do the same.
	Goldfarb Notkins + Others	The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework meets the requirements of regulation 18 VAC 10-20-683. The board may not delegate its authority to AIA or any other professional society.
149		Will there be consideration for PEs working for the Government where the PE license is a credential rather than used in actual practice?
	Fernando Angelelli Jr.	Section 54.1-404.2 of the Code of Virginia, requires completion of the equivalent of 16 hours per biennium of board approved continuing education activities.
150		Carryover credits should be allowed up to 50%. Courses taken in 2008 should be allowed towards first year credits. Hour for hour credits for course work, seminars, workshops, professional conventions, serving on professional and association boards. Annual retraining for certification required by federal and state agencies should count. Except for attendance, assessments should be dropped.
	James Roger Jones	Section 54.1-404.2 of the Code of Virginia, requires completion of the equivalent of 16 hours per biennium of board approved continuing education activities. The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework meets the requirements of regulation 18 VAC 10-20-683. The board committee considered activities such as the ones mentioned above, however ultimately decided not to accept such activities as not all of the above are educational. Annual retraining for certification required by federal and state agencies may be acceptable provided it meets the requirements of regulation 18 VAC 10-20-683. Assessments are only required for self-directed continuing education activities.
151		Board should mandate a specific amount of time be spent in predefined areas. The onus

		for approval is placed on the provider as the board has stated review and approval of classes “will be onerous and lengthy.” Will not receive credit for taking the second class under the regulations as written. Inability to carryover excess hours is “ludicrous”. PEs should be required to attend CE for land surveyors.
	John F. Hill Jr., LS	The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework meets the requirements of regulation 18 VAC 10-20-683. Taking the same class more than once is not acceptable. Section 54.1-404.2 of the Code of Virginia, requires completion of the equivalent of 16 hours per biennium of board approved continuing education activities.
152		Allow credit for being an officer in an engineering association and would be consistent with other states. Proposed documentation requirements for acceptable CE is too narrow and arbitrary.
	Carolyn Langelotti, PE	The board committee considered activities such as the one mentioned above, however ultimately decided not to accept such activities as some may not be educational.
153		Keep what qualifies as CE as open as possible.
	Dennis Johnson	The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework meets the requirements of regulation 18 VAC 10-20-683.
154		AIA credits should be accepted as well as other states’ education units. Additional opportunities are available through the internet or periodicals.
	Al Cox	The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework meets the requirements of regulation 18 VAC 10-20-683.
155		Members of the military serving overseas be granted a waiver from the CE requirement.
	Pete Stemniski, PE	Section 54.1-404.2 states in part, the board may grant exemptions or waive or reduce the number of continuing education activities required in cases of certified illness or undue hardship.
156		Allowable content and subject matter should be as broad as possible. Criteria defining

		<p>what is allowable training should be included as well as who determines this. Either eliminate the audit or include a process to get advance approval of CE training. Carryover credit should be allowed for any excess credits. How to document classes taught by a professional is unclear. One semester credit hour of approved college credit equal 16 (not 15) CE hours. Waiver process is needed for special circumstances, retirees, etc. Who makes the determination regarding the competency of course instructors? When enacted, all licensees should have a minimum of two years to complete the required 16 credits.</p>
	<p>Ronald N. Kirkpatrick, PE</p>	<p>Pre-approving courses would be burdensome to the board and would be too restrictive for the broad spectrum of course providers (our regulants are located worldwide and practice in many different areas). As the Board is not pre-approving courses, licensees have the flexibility to meet their continuing education requirements by various methods of instruction. Section 54.1-404.2 of the Code of Virginia, requires completion of the equivalent of 16 hours per biennium of board approved continuing education. Regulation 18 VAC 10-20-683 states the board may conduct a random audit of its licensees who have applied for renewal. The law was passed in 2006. Licensees were initially notified via post card by U.S. mail in March, 2008. The proposed regulations are still not in effect and once the regulations are promulgated, licensees will again be notified via post card. Additionally the proposed regulation 18 VAC 10-20-683. A. allows for a twelve month delayed enactment clause.</p>
<p>157</p>	<p>Kimberly Belfour</p>	<p>Completion of AIA CE fulfills the requirement. Excess CEUs are carried forward into the next year. Allow a six month minimum reprieve if CEUs are insufficient before license is placed in inactive status. No additional fees associated with reactivation of license other than proof CEUs are completed. AIA reports sent directly to Virginia without additional effort/paperwork from licensee.</p> <p>The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework meets the requirements of regulation 18 VAC 10-20-683. Section 54.1-</p>

		<p>404.2 of the Code of Virginia, requires completion of the equivalent of 16 hours per biennium of board approved continuing education. Documentation does not have to be provided upon renewal. The licensee only has to certify compliance. Documentation will only need to be provided to the board if the licensee is selected for a random audit. Licensee will be given appropriate due process for any deficiencies found during an audit (see APA and regulation 18 VAC 10-20-683.E). Furthermore, please note proposed regulation 18 VAC 10-20-680.A reads in part, "individual license holders applying for reinstatement are required to provide evidence of compliance with the continuing education requirements as contained in this chapter."</p>
158		<p>Allow flexibility and rely on the wide variety of professional education opportunities available. Encourage research and new approaches with an emphasis on what is learned rather than how it is learned. Keep the process simple.</p>
	Thom Lowther	<p>The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework meets the requirements of regulation 18 VAC 10-20-683.</p>
159		<p>CE content should not be limited to the professional's primary discipline. Criteria should be specific regarding allowable coursework. Carryover credit should be allowed. Coordinate requirements with other states requiring CE. Provide allowance of webinars, on-line coursework, etc. Allow non-structured experiences to substitute for formal CE, such as participation on advisory boards or committees, etc. Consider waivers for special situations such as non-practicing professionals, retirees, etc.</p>
	John G. Kuykendall, PE	<p>The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework meets the requirements of regulation 18 VAC 10-20-683. Section 54.1-404.2 of the Code of Virginia, requires completion of the equivalent of 16 hours per biennium of board approved continuing education. The board committee considered activities such as the ones mentioned above, however ultimately decided not to</p>

		accept such activities as not all of the above are educational. Regulation 18 VAC 10-20-687 states in part, the board may grant exemptions or waive or reduce the number of continuing education activities required in cases of certified illness or undue hardship.
160		In favor of Continuous Learning requirements for PEs if the requirements are similar to DoD policy.
	Jason T. Marshall, PE	The proposed regulations are drafted broadly to allow licensees the flexibility to meet continuing education requirements through a variety of methods as long as the coursework meets the requirements of regulation 18 VAC 10-20-683. The DoD coursework may be acceptable as long as it meets the requirements of 18 VAC 10-20-683.
161		The Board should carefully evaluate related experiences such as ASCE discussions, the experience of other State Boards, and the experience of professional associations such as Engineers and Surveyors Institute in NOVA to help create a model policy.
	Mohamed Kadasi, PE	As the Board is not pre-approving courses, licensees who are located not only in Virginia but worldwide, have the flexibility to meet their continuing education requirements by various methods of instruction. Comments were provided by VSPE, ACEC – Virginia, and VSAIA during the development of the proposed regulations. The ESI coursework may be acceptable as long as it meets the requirements of 18 VAC 10-20-683.
162		1) Substitute the term “board-approved” for “approved” in 18 VAC 10-20-683.C to provide consistency within the regulations 2) Modify 18 VAC 10-20-683.C.5.c to include the following as the last 2 sentences: “A passing grade is required for approval of college course-based continuing education credit hours. Continuing education credit hours cannot be claimed for audited purposes.” 3) requests that the Board consider allowing carry-over credits from one renewal period to the next with reasonable Board-imposed limitations (maximum carry-over credit) as §54.1-404.2 does not seem to exclude this 4) Clarification needs to be made as to the types of records to be maintained by regulants as required by 18 VAC 10-20-683.D.2 and the Board should stipulate the required content of continuing education

	Edward Westerman, P.E.	records. 1) The language contained in 18 VAC 10-20-683 has been modified to consistently use the term "approved". 2) Regulation 18 VAC 10-20-683.C.5.c., requires the individual to receive credit for college/university courses for it to be acceptable (licensees do not receive course credit with a failing grade). 3) According to the proposed regulations, continuing education requirements are valid only for the preceding license renewal cycle and shall not be accepted for subsequent renewal cycles or reinstatement. 4) As various methods of meeting the continuing education activity requirements may be utilized, a variety of documentation supporting successful completion will be considered.
163		1 hour of CE should be required to be ethics related
	Ted Rappaport, P.E.	The Board is not pre-approving courses. Regulation 18 VAC 10-20-683 states in part activities must be related to practice of the profession of the license being renewed, have a clear purpose and objective which will maintain, improve, or expand the skills and knowledge relevant to the licensee's area of practice....

All changes made in this regulatory action

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

Current section number	Proposed new section number, if applicable	Current requirement	Proposed change and rationale
18 VAC 10-20-670	Same	N/A	Sixteen hours continuing education required for licensees upon renewal to better protect the public
18-VAC 10-20-680	Same	N/A	Sixteen hours continuing education required for licensees upon reinstatement to better protect the public.
Doesn't exist	18 VAC 10-20-683	N/A	Sixteen hours continuing education required for licensees upon renewal to better protect public
Doesn't	18 VAC 10-	N/A	Exemptions and waivers are available.

exist	20-687		
18 VAC 10-20-790	18 VAC 10-20-790	N/A	Allows the Board to take action against licensees who do not meet continuing education requirements.

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 regulations were developed with consideration that the affected industries consist of small businesses. The Board considers that the regulatory methods implemented were promulgated to accomplish the applicable law while minimizing the adverse impact on small businesses and are consistent with the regulation of small businesses of other professions.

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 contemplated changes are not anticipated to have any significant impact on Virginia’s families.