

2762

RECEIVED

June 1, 2009

2009 JUN -6 AM 9:44

Thomas A. Blackburn, Esq.  
State Registration Board for Professional Engineers, Land Surveyors and Geologists  
P.O. Box 2649  
Harrisburg, PA 17105-2649

Dear Mr. Blackburn:

I am submitting comments on the State Registration Board for Professional Engineers, Land Surveyors and Geologists' Proposed Regulations 16A-4710 (continuing education) published in the May 2, 2009 Pennsylvania Bulletin on behalf for my lobbying clients the *American Council of Engineering Companies of Pennsylvania* (ACEC/PA) and the *Pennsylvania Society of Land Surveyors* (PSLS).

As you may be aware, both organizations are pursuing a legislative effort have Pennsylvania's Continuing Education requirements align as closely as possible the National Council of Examiners of Engineering and Surveying (NCEES) requirements. The current language of the Act does not seem to allow this close alignment.

In §37.1 Definitions an hour of continuing education is defined as Sixty minutes of actual instruction in an approved course of continuing education. NCEES defines an hour of continuing education as 50 minutes of instruction. We would urge that the Pennsylvania regulations mirror NCEES Model Regulations on this issue.


We applaud the Board for its handling of licensees with multiple licenses in § 37.111; recognizing that each license is individual but the same course may apply to more than one license.

§ 37.113 states that a licensee only receives credit for attending courses and in (e) goes so far as to specifically exclude means of earning credit that a specifically allowed by NCEES. We feel that there are a variety of ways that a professional can upgrade their skills and urge that the regulations reflect this. We do recognize that there is debate as to whether the current law would allow this which makes the case for a change in the law.

In § 37.115 (e)(5) states "For each course of continuing education, the provider shall: . Evaluate the program through the use of questionnaires of the participants and instructors." Who will generate this questionnaire; the provider or the board?

Thank you for the opportunity to comment on these proposed regulations.

Sincerely,



Andrew J. Hilt  
Executive Vice President  
PA Design Association Center