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IRRC

January 10, 2014

Independent Regulatory Review Commission  
333 Market Street, 14th Floor  
Harrisburg, PA 17101  
[irrc@irrc.state.pa.us](mailto:irrc@irrc.state.pa.us)

2014 JAN 10 PM 3:26

RE: IRRC #2994/ Regulation #16-A-6110 Continuing Education and Elimination of Registration without Examination

On behalf of the American Society of Landscape Architects, I am writing in support of the adoption of Regulation 16-A-6110. Based upon my experience working with regulations across the United States, both areas that are being amended in this proposal are consistent with national standards for professional regulation of landscape architecture. ASLA appreciated the opportunity to testify before the Board of Landscape Architects on this proposal at their November meeting.

Registration without Examination

Examination is essential as an objective measure of an applicant's ability to protect the public health, safety, and welfare. States typically include a grandfather clause upon enactment of regulation to ensure that existing practitioners are not unfairly impacted by new regulation; however, this exemption is rarely extended on an ongoing basis. Removal of these rules will not only conform to Act 24 of 2009, but also establish a standard for applicants consistent with other states.

Continuing Education

The increase of continuing education hours from 10 to 24 hours per biennium also meets the prevailing trends in continuing education (CE) nationwide, particularly in the Mid-Atlantic region. The average number of hours needed each biennium among the 35 states that require CE is 22.7 hours. Many states have a comparable requirement of 24 hours (or more), including Alabama, Alaska, Connecticut, Indiana, Iowa, Kansas, Kentucky, Minnesota, Mississippi, Missouri, New Hampshire, New Jersey, New Mexico, New York, Ohio, Oklahoma, Oregon, South Dakota, Tennessee, Texas, Washington, and Wisconsin. Furthermore, all design professions are exploring the standardization of regulations so that all states would move to a 12 hour/year requirement. The proposal's change to require registrants to keep a six-year record is not overly burdensome. In fact, under the Landscape Architecture Continuing Education System (LA CES), which approves CE providers, all providers must retain attendee records for six years.

ASLA is confident that the changes proposed in this regulation are consistent with national standards and will not create an undue burden for landscape architects. I'd like to commend the Pennsylvania State Board of Landscape Architects and its staff for their tireless work to craft a fair and workable regulation. Thank you for your consideration of this matter.

Sincerely,

Handwritten signature of Julia M. Lent in black ink.  
Julia M. Lent, Hon. ASLA  
Managing Director, Government Affairs

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