



A state society of the National Society of Professional Engineers

January 3, 2017

Board of Professional Engineering
ATTN: Rule Comment
Office of Professional Regulation
89 Main Street, 3rd Floor
Montpelier, Vermont 05620-3402
Sent via email: sos.engineers@sec.state.vt.us

RE: Proposed Administrative Rules of the Board of Professional Engineering

Dear Board of Professional Engineering:

This letter is in response to the Board of Professional Engineering's (PE Board's) December 7, 2016 request for feedback on the proposed updates to the "Administrative Rules of the Board of Professional Engineering" (Rules). The most significant update to the Rules is that licensees will be required to obtain 30 professional development hours (PDHs) as a prerequisite to the biennial license renewal starting on July 31, 2018. The Vermont Society of Professional Engineers (VSPE) is committed to the future of the licensed professional engineer across all the engineering disciplines our members serve, and fully supports that licensees meet the continuing professional competency requirements proposed in the update Rules. With that said, the following questions/comments about the Rules have been presented to the VSPE Board of Directors from our members that we would like the PE Board to consider:

1. It is our understanding that the Rules will be adopted during 2017, but licensees will be required to obtain the full 30 PDHs prior to the biennial license renewal deadline of July 31, 2018. Based on the likely adoption of the Rules taking place in 2017, approximately one year prior to the renewal deadline, we ask that the Board consider requiring half of the PDHs (15) with the first license renewal. The full 30 PDH prerequisite would start with biennial license renewal in 2020.
2. There are many non-practicing/retired professional engineers in Vermont that would like to maintain their professional title. The Rules, as drafted, do not provide an exemption from the continuing professional competency requirement for these individuals. We ask that the Board consider modifying the Rules to allow for an emeritus status for those professionals that no longer are practicing their profession, but wish to maintain their title.

We thank you for adding the continuing professional competency requirements to the Rules. VSPE believes this action is long overdue and will enhance the professional engineer's ability to protect the welfare of the public.

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If you have any questions, please feel free to contact me at 802-728-3755 or crivet@sanbornhead.com.

Sincerely,
Vermont Society of Professional Engineers



Christopher J. Rivet, PE
State President