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V

Final Regulation Agency Background Document

Agency name	Department of Criminal Justice Services
Virginia Administrative Code (VAC) citation	6 VAC 20-171
Regulation title	Regulations Relating to Private Security Services
Action title	Comprehensive Revision – Regulations Relating to Private Security Services
Date this document prepared	December 18, 2012

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

Brief summary

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of the proposed new regulation, proposed amendments to the existing regulation, or the regulation proposed to be repealed.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

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

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 or board taking the action, and (3) the title of the regulation.

The Criminal Justice Services Board adopted, as final, the proposed regulations and final changes to the proposed Regulations Relating to Private Security Services, 6 VAC20-171 at their Board meeting on December 6, 2012. Final changes to sections 6VAC20-171-460-470 were adopted by the CJSB on May 9, 2013.

Legal basis

Please identify the state and/or federal legal authority to promulgate this proposed regulation, including (1) the most relevant citations to the Code of Virginia or General Assembly chapter number(s), if applicable, and (2) promulgating entity, i.e., agency, board, or person. Your citation should include a specific provision authorizing the promulgating entity to regulate this specific subject or program, as well as a reference to the agency/board/person’s overall regulatory authority.

The legal authority to review, amend or revise regulations relating to private security services is found in the Code of Virginia §9.1-141. Additionally, this review is in accordance with Executive Order 14 (2010). The Department has the statutory authority to adopt regulations pursuant to the Code of Virginia §2.2-4011 (B).

Purpose

Please explain the need for the new or amended regulation. 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.

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

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

Substance

Please 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.

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

6 VAC 20-171-10 – Definitions:

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

6 VAC 20-171-20 – Fees

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

6 VAC 20-171-30 – Fingerprint processing

Proposed amendments are included to reflect the current criminal history records search process utilized by the Department, including the requirement that detector canine handler examiners submit for a criminal history check pursuant to the Code and including language that establishes that an application for a credential must be submitted within 120 days of the fingerprint submittal.

6 VAC 20-171-50 – Initial business license application and 6VAC 20-171-60 Renewal license application

The proposed amendments incorporate the new categories of locksmith and detector canine business, clarify the fingerprint submittal requirements for an initial business, clarify what constitutes a legal entity change thus requiring a new license, removes the exemption for sole proprietors to incorporate without having to submit for new licensure, and specify the type of required general liability insurance. In addition, the restriction that a compliance agent can only work for one licensed business at a time has been deleted.

6 VAC 20-171-70 – Compliance Agent

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

6 VAC 20-171-80 to 6 VAC 20-171-90 - Initial and Renewal Training school certification

The proposed amendments establish the categories of training in which schools will be required to submit a category of training fee depending on the number of training categories provided by the training school.

Clarify what constitutes a legal entity change thus requiring a new school certifications, removes the exemption for sole proprietors to incorporate without having to submit for new certification, and specify the type of required general liability insurance.

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

Proposed amendments include a new category of training fee and range qualification requirements for firearms instructors to include patrol rifle if applicable to the instructor.

The proposed language also included new training requirements for instructors to complete an entry-level and in-service regulatory compliance training and included the training in a new section: *VAC-20-171-111*. Based on comments received, the Department is recommending that this language be removed and regulatory compliance training be included in the instructor development training requirements.

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

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

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

The amendments include the new categories of registration for locksmiths and detector canine handlers and removed the language for individuals to submit an electronic photo to the department.

6VAC20-171-135 – Firearms endorsements

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

6 VAC 20-171-160 – 6VAC20-171-170 - Additional category/Replacement Registration

Proposed language included the ability for certified individuals to add a category or request a replacement certification and replaced all instances of the term photo identification with registration or certification pursuant to the language in the Code.

6 VAC 20-171-180 – Reinstatement

Amendments to the reinstatement procedures have been inserted which allow a company to continue to operate during the reinstatement period and establishes continued authority by the Department. Language was also included to clarify that firearm endorsements are not eligible for reinstatement.

6VAC20-171-190 – Renewal extension

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

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

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

6 VAC 171-215 to 6 VAC20-171-280 – Administrative Requirements and Standards of Conduct

Amendments reflect new administrative requirements and standards of conduct for businesses, compliance agents, training schools, training school directors and instructors. These amendments include the removal of a provision that a business license or training school certification is null and void due to a lapse of insurance and inserts a clause that each day of uninsured activity would be construed as an individual violation. New provisions have been inserted for reporting requirements upon termination

of a compliance agent or training school director. Administrative requirements to maintain a use of force policy, maintain records for employees carrying intermediate weapons, and records in regard to detector canine handler teams have been added for businesses.

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

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

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

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

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

6VAC20-171-308 – Detector Canine Handler Examiners

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

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

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

6 VAC20-171-350 – Entry level training

The entry-level training has been restructured to include specific courses and hours for clarity. In addition, the minimum course and hour requirements for locksmiths and detector canine handlers have been added. The compulsory minimum training standards for armed security officers has increased from 40 hours to 50 hours based an additional 10 hours of firearms training and the hours for shotgun entry-level training having increased from 2 to 4 hours.

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

Signs of Terrorism has been included in all entry-level compulsory minimum training standards.

6VAC20-171-360 – In-service training

The amendments include in-service training requirements for locksmiths and detector canine handlers and combines the course content and minimum hour requirements within one section (Section B) thus eliminating the need for Section C. In addition, the electronic security subjects for the four electronic security related registrations have been combined into one in-service requirement.

6VAC20-171-365 through 400 – Firearms training

The entry-level firearms training compulsory minimum training standards have been amended and increased by 2 hours. An enhanced firearms training for armed security officers/couriers has been

inserted (6VAC20-171-375) and reflects an increase of 8 hours of training compared to the entry-level firearms training for all other armed registered categories. The entry-level handgun range qualification has been moved to a new section for clarity purposes (6VAC20-171-376).

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

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

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

Amendments to firearms retraining increases the classroom hours to 4 hours for all armed registered personnel with the exception of personal protection specialists who must complete advanced firearms retraining.

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

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

6VAC20-171-460-470 – In-Service and firearms training exemption.

This section has been amended to allow for the approval of training exemptions for in-service training taken within the 24-month registration period and allow for partial training exemptions for entry-level firearms training or range qualification.

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

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

Issues

Please identify the issues associated with the proposed regulatory action, including:

- 1) the primary advantages and disadvantages to the public, such as individual private citizens or businesses, of implementing the new or amended provisions;*
 - 2) the primary advantages and disadvantages to the agency or the Commonwealth; and*
 - 3) other pertinent matters of interest to the regulated community, government officials, and the public.*
- If there are no disadvantages to the public or the Commonwealth, please indicate.*

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

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

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.

The changes to the text since the publication of the proposed stage include the removal of all references that the Department issue a *photo identification card*, the Code requires that the Department issue a *registration card*. The Department does not have any control over the identity verification process and is concerned with the risk of providing a state issued photo identification without direct verification of identity. This final action removes many of the proposed amendments after receiving input from the industry, these include retaining the \$10.00 firearm endorsement fee, removing the requirement for additional training for instructors, retaining the requirement that businesses and schools maintain a physical address in Virginia for records and eliminating the proposal for self-audits. New language has been added that clarified the credentialing requirements for Detector Canine Handler Examiners and for the approval of online training programs. Training was amended for the Security Officer Handgun training and the training topic The Seven Signs of Terrorism, was amended to Signs of Terrorism.

This action has also combined the in-service training requirements for the electronic security registration categories into one electronic security in-service course that will meet the needs of all 4 categories thus eliminating duplication in training and allows for training waivers to be accepted for a 24 month period, allows for prior firearms training to be considered for requalification purposes and lastly eliminates language that allows for an individual to not report a conviction if they are currently appealing the conviction, or the time to appeal is still active.

Other changes were grammatical in nature.

Section number	Requirement at proposed stage	What has changed	Rationale for change
171-10	Definitions	Amended the definition of entry-level training, on-line training, and training requirement and inserted a definition for learning management system.	Based on public comment/suggestions and the need to establish terminology related to variances in methods of conducting training.
171-20	Fees Replacement Photo Identification	Removed all references of photo identification and reinserted the original	The Code directs the Department to issue a registration card, not a “photo” identification card. The practice of issuing a photo

	Application and a firearm endorsement fee of \$15.00	firearm endorsement fee of \$10.00	<p>identification card was implemented when the Department was able to partner with DMV. The individual's identity was verified prior to the issuance of the credential. Due to budget constraints and diminishing resource, the partnership was no longer feasible. As a result, the Department attempted to work with private training schools for the purposes of photo submittal. At this time the Department does not have any control or oversight over the identity verification process of an individual. In addition this goes above and beyond what is mandated by the current Code of Virginia to issue a registration card to eligible individuals.</p> <p>The firearm endorsement fee increase was removed based on the Department combining the registration card and firearm endorsement card into one credential.</p>
171-50 (B) (5-6)	<p>Initial License Application</p> <p>Proposed deleting the requirement to maintain a physical address.</p> <p>Compliance agents can only be designated for one licensee at a time.</p>	<p>Reinserted the requirement for businesses to maintain a physical address in Virginia where records will be maintained.</p> <p>Removed language that restricted a compliance agent from working for more than one business at a time.</p> <p>Reformatted due to amendments</p>	Based on public comment.
171-60 (C)(7)	<p>Renewal license application</p> <p>Required businesses to complete a self-audit as part of the renewal process.</p>	<p>Removed the proposed language for businesses to complete a self-audit as part of the license renewal process.</p> <p>Reformatted section numbers to reflect changes.</p>	Based on public comment.
171-80 (B)(5)	<p>Initial Training School Application</p> <p>Proposed deleting the requirement to maintain</p>	<p>Reinserted the requirement for training schools to maintain a physical address in Virginia</p>	Based on public comment.

	a physical address.	where records will be maintained. Reformatted based on amendments.	
171-90 (C)(7)	Renewal certification application Required schools to complete a self-audit as part of the renewal process.	Removed the proposed language for schools to complete a self-audit as part of the license renewal process. Reformatted section numbers to reflect changes.	Based on public comment.
171-100 (C) 171-110 (B)(1) 171- 110 (D)(4)	Instructor Certification and Renewal Instructor applications Required instructors to complete a 4 hour regulatory compliance training.	Removed the proposed language for instructors to complete instructor regulatory compliance training.	Based on public comment. This training will be incorporated into the general instructor development training and not as a separate course.
171-111	Instructor Regulatory Compliance Training The application process for instructor regulatory compliance training.	Removed the entire proposed section.	Section no longer needed when the requirement was removed in 171-100.
171-115 (A)(3-6) 171-115 (C)	Initial Detector Canine Handler Examiner Certification. Eligibility and application requirements for certification as a detector canine handler examiner.	Insert at the end of the sentence: <u>within the previous 10 years prior to application with the Department.</u> Delete or be sponsored by a certified DCJS private security services detector canine handler examiner; and insert the word <u>and</u> Delete # 5 which requires a written examination and performance evaluations according to department guidelines. Amend #6 to read #5 Delete Section C requiring regulatory compliance training Reformat paragraphs D-G to read C-F	Based on public comment and direct meetings with representatives from the Detector Canine Industry.

<p>171-116 (B) (2-3)</p>	<p>Renewal detector canine handler examiner certification.</p> <p>Required regulatory compliance training.</p>	<p>Delete subsection B.(2) requiring regulatory compliance in-service training. Renumber 3 to 2 and insert in private security services or related field after the word certified.</p>	<p>Based on public comment the regulatory compliance training was not necessary. Examiners must be employed by businesses or schools in which the compliance agent and school director complete regulatory training and are responsible for their employees adhering to the Code and Regulations.</p>
<p>171-117</p>	<p>Detector Canine handler examiner regulatory compliance training enrollment procedures</p>	<p>Delete the entire section 6VAC20-171-117 Detector canine handler examiner regulatory compliance training enrollment</p>	<p>No longer necessary since the requirement was removed from 171-115 and 171-116.</p>
<p>171-120 (B)(4) 171-130 (B)(3)</p>	<p>Initial and Renewal Registration application requirements. Required that individuals submit an electronic photo for the purposes of a photo ID.</p>	<p>Removed all requirements for a registrant to submit an electronic photo.</p>	<p>The Department is not mandated to provide photo identification cards.</p>
<p>171-170</p>	<p>Additional category/replacement registration requirements.</p>	<p>Deleted all references of photo identification card and replaced with registration or certification card.</p>	<p>The Department is not mandated to provide photo identifications cards.</p>
<p>171-220 (A)(1)</p>	<p>Business administrative requirements.</p> <p>Proposed removal of the requirement to maintain a physical address.</p>	<p>Reinserted the requirement to maintain a physical address in Virginia where records will be maintained Inserted an additional requirement to maintain physical addresses/locations in Virginia that are utilized by a licensee to provide regulated services.</p>	<p>Based on public comment.</p>
<p>171-220 (A)(7) 171-220 (A)(10)</p>	<p>Business administrative requirements.</p> <p>Only allowed designation of a compliance agent if they had not been designated by another licensee.</p>	<p>Deleted all language that restricted a compliance agent from being designated for more than one business at a time.</p>	<p>Based on public comment. The Department agrees that this requirement was restrictive and the employment of a compliance agent should be the decision of a business.</p>

<p>171-220 (A)(14)</p>	<p>Business administrative requirements.</p> <p>Requires the business to inform the department within 10 days of receiving knowledge of a conviction, unless it is under appeal.</p>	<p>Deleted all language relating to there being no appeal therefrom or the time for appeal having lapsed that exempted individuals from reporting criminal activity if they were appealing the conviction.</p>	<p>This was a public safety issue which allowed for registered individuals, who would be prohibited from working in the private security services industry, the opportunity to not report a criminal conviction if they were appealing such conviction.</p>
<p>171-220 (A)(19)</p>	<p>Business administrative requirements.</p> <p>Requires employees carry the department issued photo identification registration card.</p>	<p>Deleted all references to photo identification card</p>	<p>Not mandated by Code.</p>
<p>171-230 (A)(10)</p>	<p>Business standards of conduct</p> <p>Establishes that the licensee cannot be convicted of certain crimes unless under appeal.</p>	<p>Deleted all language relating to there being no appeal therefrom or the time for appeal having lapsed that exempted individuals from reporting criminal activity if they were appealing the conviction.</p>	<p>This was a public safety issue which allowed for registered individuals, who would be prohibited from working in the private security services industry, the opportunity to not report a criminal conviction if they were appealing such conviction. This language was in conflict to the eligibility requirements established in the Code.</p>
<p>171-240(A)(5,7) 171-240(A)(10)(d)</p>	<p>Compliance Agent administrative requirements and standards of conduct.</p>	<p>Deleted all language relating to there being no appeal therefrom or the time for appeal having lapsed that exempted individuals from reporting criminal activity if they were appealing the conviction.</p> <p>Deleted all references to a compliance agent designation for only one business at a time.</p> <p>Deleted all references to photo identification.</p> <p>Reformatted the sections based on amended language and other minor grammatical changes</p>	<p>Same rationale utilized in the business administrative requirements and standards of conduct under 6VAC20-171-220 and 230.</p>

<p>171-250 -280 250 (A)(9) 260 (A)(10) 280 (3,5)</p>	<p>Training School and Training school director administrative requirements and standards of conduct.</p>	<p>Deleted all language relating to there being no appeal therefrom or the time for appeal having lapsed that exempted individuals from reporting criminal activity if they were appealing the conviction.</p>	<p>Same rationale utilized in the business administrative requirements and standards of conduct under 6VAC20-171-220 and 230.</p>
<p>171-300 (D) (2,9, 12)</p>	<p>Private security services training session There will be no live ammunition permitted in the classroom.</p>	<p>Reformatted the sections based on amended language and other minor grammatical changes. Inserted language in regard to live ammunition being utilized or present in firearms training environments.</p>	<p>To clarify what environment is acceptable or unacceptable for live ammunition.</p>
<p>171-305</p>	<p>On-line in-service training programs. Outlines the requirements that a certified school must follow in order to provide on-line training.</p>	<p>Inserted additional requirements to ensure that on-line training courses met the minimum requirements pursuant to 171-360 for classroom training. Inserted a requirement that the on-line training must be delivered through a learning management system (LMS) and include student assessment instruments. Amended all references of training software to reflect a learning management system. Lastly amended the reporting requirements in regard to the certificate of completion documentation.</p>	<p>To allow for distance learning while ensuring that the minimum training requirements are still met.</p>
<p>171-308 (A)(3,-6) 171-308 (B)(2)</p>	<p>Detector Canine Handler administrative requirements and standards of training.</p>	<p>Included language to establish the standards that must be utilized when conducting an</p>	<p>Based on public comment and meetings with representative from Detector Canine industry</p>

		examination.	
171-310-320 310 (4) 320 (4, 8, 14)	Registered personnel administrative requirements and standards of conduct	Removed all references of photo identification card and inserted registration card.	Not mandated by Code
171-350 (D) (D) (1) (a)(4) (D) (3) (b) (D) (5)(a)(5) (D) (6) (a) (1) (D) (7) (a) (3) (D)(11) (a)(5) (D)(12)(a)(1)	Entry-level training	Modified the training standard "The Seven Signs of Terrorism" to read "Signs of Terrorism" and deleted all references to photo identification cards.	Based on public comment and to allow for a broader opportunity for the schools to establish their training curriculum.
171-360 (B) (8-11)	In-Service Training Individual job related in-service training requirements for Each ES category of registration	Replaced the individual in-service requirements for the four electronic security registrations to one in-service requirement of Electronic Security Subjects. Deleted all references to photo identification cards.	Based on public comment and the duplication of training. Photo identification cards are not mandated by Code.
171-365 (D)	Firearms Training Only allowed for entry-level as a prerequisite.	Inserted language that would allow the personal protection specialist to complete either the entry-level or armed security officer firearms training as a prerequisite of advanced training.	This was to fix an oversight by the Department. Both trainings should be utilized for a prerequisite to advanced firearms.
171-370 – 375 370 (A)(1) (e) (3) 375 (1) (a) (17-18) 375 (1)(c) (8-11)	Entry-level handgun training and Security Officer handgun training	Made amendments to the entry-level and armed security officer handgun training standards to include: negligent discharge prevention; tactical considerations;,, movement;,, cover and concealment; and multiple target drills.	Based on public comment and input from the PSSAB training committee.
171-390 (C) (3)	Advanced handgun training.	Deleted the word advanced from certified advanced firearms instructor.	The proper terminology is certified firearms instructor.
171-400 (A)	Firearms Retraining	Removed the reference of an alternate course as that section was	Remove unnecessary language.

		removed during the proposed stage.	
171-460	In-service training exemption	Increased time to complete training from 12 months to 24 months.	Training at a certified school can be completed anytime during the 24 month renewal period. This change would allow for alternative training to qualify if completed anytime within the 24 months versus the last 12 months of the renewal period. This was requested by the industry.
171-470	Prior firearms training exemption	Remove the restriction that exemptions are only accepted for in-service only.	This allows for firearms training that meets or exceeds the compulsory training standards to be utilized for both entry-level and in-service requirements.

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.

Commenter	Comment	Agency Response
*Lynn Comer *Dianne Rust *Jan Mathews	Out of state records - Expressed concerns about the proposal to remove the requirement that out of state companies must maintain a physical location in the Commonwealth where records must be maintained and available to the Department.	The Department reviewed the concerns and agreed that the requirement should remain in the regulations. The language has been reinserted
*Lt. William E. Sparks-American Security Group *AH. Mosrie - Training Director - Associated Security Training Center *Hall	6 VAC 20-171-400 – Expressed concerns over the necessity of increasing the hours for firearms retraining. Also commented on the increase of the firearm endorsement and the costs of additional training being burdensome. Proposed additional hours of training – generally applauds increased training hours/range/rounds of fire but is concerned with current economic situation. Recommends that consideration be given and comments that there comes a point of diminishing returns and in our effort to improve the security industry we must not lose sight of the human side of the equation. Mr. Hall commented on the economic issue of increased training.	The increase to firearms was the result of numerous meetings with the training committee of the PSSAB, which included industry members and firearms instructors. The necessity of this training is supported due to the high volume of unnecessary firearm discharges over the last few years and concerns of public safety. The Department took all measures to try and limit the costs associated with increased training and has also removed the increase fee for the firearm endorsement application.

<p>*K. W. Robinson</p>	<p>Communication – Expressed concern that a more concerted effort should be made to communicate law and regulation changes to training schools. Commented that instructors need to be provided with the information because they are the ones providing instruction to the industry.</p>	<p>The Department agrees and has taken steps to improve the communication between the Department and the regulated industries. We support all opportunities to maintain and strengthen the relationship between the industry and the regulatory agency in our mission in protecting the public</p>
<p>*Ross Nelson, Digital Fury Technologies LLC *Wayne Boggs, Richmond Alarm Company *Mary Kathryn Smith, Lynchburg Alarm Company *Jimmy Boggs, Richmond Alarm Co. Greg Allen</p>	<p>*Locksmiths and Electronic Security Technicians – Expressed concerns about the dual credentialing required of electronic security technicians and locksmiths as well as for the dual licensure for the companies providing a service that falls within two definitions. Requested amendments to the definitions and offered a suggestion: Allow those with electronic security licenses to perform functions related to electronic locking mechanisms without having to gain additional licenses for locksmithing.</p> <p>Exemption of ES Techs from Locksmith Regulation – Wayne Boggs expressed similar concerns and felt that maintaining a second registration did nothing to protect the public safety and only increases regulation and the costs to the individual.</p> <p>All individuals listed provided similar comments</p>	<p>The Department is sensitive to the concerns of both of these industries and agrees that a code change will clarify the difference for the two industries. The department is going to revisit this concern with their legal council to see if there is a way in which to work within the code definitions that are currently in place that will eliminate the redundancy of credentials</p>
<p>*Lynn Comer *Wayne Boggs, Rick *Heinig, LeMark *Butler, Patricia *Smith, Antoine *Jackson, Jason *Read, Wayne *Shemko and other members of Richmond Alarm Company *Mary Kathryn Smith, Lynchburg Alarm Company *Electronic Security Association of VA *Betsy Clark, Guardian Security Systems, Inc. Dianne Rust Stan Corn, Alarms, Inc. *Gina Demmert</p>	<p>Training – Expressed concern that training needed a complete overhaul. Received comments on the ethicality of some of the companies providing training in which individuals must take to meet the in-service training requirements. Suggested that the electronic security industry have the authority to train their own employees.</p> <p>Many of the comments repeated the same issues, the minimum training requirements did not meet the needs of the industry, the in-service training was duplicated for additional categories and companies wished to provide their own training.</p>	<p>Businesses currently have the option to apply for and obtain certification as a training school which would provide the credentialing needed for them to train their own employees. Based on meetings with the electronic industry, there was concern about the minimum compulsory training standards and the duplication of in-service training. The Department agrees that there is duplication and combined the individual electronic security related in-service trainings into one electronic security training requirement that would qualify for any of the electronic security registration categories. Eliminating the requirement for a business to obtain a training school certification would require statutory amendments.</p> <p>The regulations currently allow for individuals to take alternative training or</p>

<p>*Jonathan Brightwell *Chris Bishop *Tom Kenney *Greg Allen *Danielle Robinson *Keiosha Christian *Steve Wright *Jan Mathews</p>		<p>for schools to utilize guest lecturers or subject matter specialists. The regulations require that individuals meet compulsory minimum training standards and must ensure that alternative training meets or exceeds these standards. Businesses may choose to provide employees with additional training as they deem necessary.</p>
<p>*Meador & Company Locksmith LLC James Washburn</p>	<p>Mr. Washburn’s comments were similar and represented the locksmith industry’s interests, in addition Mr. Washburn recommended a code amendment that would allow for apprenticeships.</p>	<p>Please see response above.</p>
<p>*Lynn Comer *Dianne Rust *Electronic Security Association of VA *Wayne Boggs, Richmond Alarm Co. *Mary Kay Wakefield *Jimmy Boggs, Richmond Alarm Co. *Jan Mathews *Elizabeth Ball Townsend, Hanover Security, Inc. *Stan Corn, Alarms, Inc.</p>	<p>Self-Audits and Penalties – Comments reflecting opposition to the proposed requirement that businesses and schools conduct a self-audit prior to renewing a license or certification. Expressed concerns that this could result in self-incrimination and may be a Fifth Amendment issue as well as being an additional burden on the company.</p>	<p>The Department reviewed the concerns and removed the proposed language from the text.</p>
<p>*Wayne Boggs, Richmond Alarm Company *Electronic Security Association *Mary Kay Wakefield *Jimmy Boggs, Richmond Alarm *Dianne Rust *Stan Corn, Alarms, Inc. *Cynthia Washburn *Meador & Company Locksmith LLC James Washburn *John Kochensparger</p>	<p>Compliance Agent Requirements – Comments were received regarding eliminating the restriction that a compliance agent can only work for one licensee at a time. Currently a Compliance agent may represent only a single Private Security Business. The Electronic Security Industry is made up by and large by very small companies, whose owners have difficulty managing all the different responsibilities required by the myriad of regulations with which they must comply. In most other business areas responsible parties or registered agents may represent any number of businesses. To allow a Compliance Agent to represent multiple businesses would raise the level of professionalism and help to insure that Private Security Businesses would receive knowledgeable advice.</p> <p>Mr. Kochensparger concurs with these comments but also requested that businesses have the ability to 1099 compliance agents.</p>	<p>The Department concurs and eliminated the restriction. The Department believes that companies should be able to designate any individual who meets the eligibility and regulatory requirements and that this is a business decision.</p> <p>Currently the Code requires that compliance agents must be an employee of the business. Any changes would require a legislative amendment.</p>

<p>*Lynn Comer *Jimmy Boggs *Jan Mathews *Martha Clancy</p>	<p>Trainers needing to be Compliance officers – Opposed the proposal that instructors complete a separate regulatory compliance training and felt that it was an unnecessary burden without benefit. Felt that if the regulations were clearly written there would not need to be additional training.</p>	<p>The Department does not agree that regulatory compliance training is unnecessary. Based on compliance and enforcement records as well as input from the industry it is felt that instructors should receive administrative related training in regard to the Code and Regulations. These instructors at times have the first opportunity to ensure that regulated industries are provided with correct information. The Department does agree that a separate class will not be necessary and will incorporate the training in the general instructor course requirements.</p>
<p>*Sean Tate, PACC</p>	<p>6vac 20-171-32 paragraph 4 Convictions</p> <p>Mr. Tate commented that DCJS should be allowed to issue exemptions on a case by case basis in regard to individuals who have a criminal history record. He also was concerned that armed security officers would not be required to maintain a registration if working for a proprietary business.</p> <p>Lastly, Mr. Tate felt that the training standard that covered lead exposure was not necessary in firearms training.</p>	<p>Pursuant to the Code, the Director of the Department currently has the authority to waive the prohibition of credentialing based on previous criminal history records.</p> <p>Pursuant to the Code, an armed security officer working for a proprietary business must obtain a registration if they have direct contact with the general public.</p> <p>The Department disagrees that covering lead exposure is not necessary for firearms training.</p>
<p>*Jan Mathews, Shenandoah Valley Security</p> <p>*John Kochensparger</p>	<p>Eliminate manual processing fee – expressed concerns that a manual processing fee would be charged when the current on-line system was not functioning properly.</p> <p>Mr. Kochensparger’s comments addressed the same concern, in addition, he commented on the increase to the instructor certification application fees.</p>	<p>The manual processing fee will only be required if there is an available electronic method established by the Department. At this time, the on-line application system is not available and is currently being tested to ensure user friendly functionality.</p> <p>The instructor category fee is based on the application processing time required to review additional categories of training.</p>
<p>*James St. John</p>	<p>6VAC20-171-10. Definitions: commented that there was a conflict in the definition of classroom training based on an administrative requirement to not have live ammunition in a classroom. In addition Mr. St. John recommended that the definition of combat loading be amended and reinserted into the regulations.</p>	<p>The Department agreed that there was a conflict in the language and made the amendment to section 171-300 but did not agree that the regulations should define every aspect of training standards which includes combat loading.</p>

<p>*James St. John</p>	<p><u>6VAC20-171-180(F) and (H) (on reinstatement)</u>. Disagreed with the need to include additional language in regard to the Department’s authority during the period of time in which an applicant reinstates a license. Felt the language in the Code was enough.</p>	<p>This language was originally inserted because the Department did not have any authority over an individual who was not actively credentialed. Since this regulatory action was initiated, the code has been amended to give the Department authority over those individuals who are required to be licensed/registered or certified. The Department feels that this language should remain to clarify to individuals who fall within the reinstatement period that they can continue to work during the reinstatement period, are considered licensed/registered and are still required to maintain compliance with the regulations during this period.</p>
<p>*John St. James</p>	<p>Recommended various grammatical, formatting and language changes for clarity.</p> <p><u>6VAC20-171-365, 6VAC20-171-370, 6VAC20-171-375, 6VAC20-171-380, 6VAC20-171-390, 6VAC20-171-395</u> Expressed numerous concerns in regard to the firearms training and felt the changes did not make for a better schema than currently exists though well intended. He spoke to the issues generally and felt there were too many line item references to specify. He did point out that the way the language was written the basic firearms course was required prior to taking advanced, but the armed security officer did not qualify as a pre-requisite.</p> <p>Offered a recommendation that basic, intermediate and advanced be utilized as course titles. Also pointed out that there were not enough variances between the entry and the armed security to justify the increase of hours.</p> <p>Did not agree that familiarization should be part of the range qualification and that they were not a training exercise but an assessment.</p> <p>Mr. St. John felt like a full rework needed to be done on the firearms training segments of the regulations.</p>	<p>The Department thanks you for your comments.</p> <p>The changes to firearms training was the result of numerous meetings with the training committee of the PSSAB, which included industry members and firearms instructors. The necessity of this training is supported due to the high volume of unnecessary firearm discharges over the last few years and concerns of public safety. The Department took all measures to try and limit the costs associated with increased training and has removed the increase for the firearm endorsement.</p> <p>After receiving public comment the department included additional training objectives to the entry-level and armed security officer training.</p>
<p>*John St. James *Martha Clancy *Chuck Tobin</p>	<p>At 6VAC20-171-350 (D)(3)(...) “Expressed concerns with the inclusion of the training standard “Seven Signs of Terrorism. Commented that Terrorism certainly should be covered but so should other threats as well.</p> <p>In addition it was expressed that it was too restrictive</p>	<p>The Department changed the requirement to Signs of Terrorism to enable the schools to establish training that is current and relevant and still meet the recommendations of the Commonwealth Preparedness Panel.</p>

	for a course content requirement.	
*Mark Baldino	Locksmith Code or may use for all applicant divisions – recommended that the regulations require businesses to list all physical addresses in which business services are offered. Also recommended that all paid advertising must list a DCJS number and that fines be increased to \$10,000.	The Department concurs with the request to require physical addresses for all business locations and implemented this language into the document. In regard to the paid advertising and the increase to fines, both of these changes would require a statutory amendment.
*Wayne Boggs, Richmond Alarm Company *Meador & Company Locksmith LLC James Washburn	Use of Temporary Agencies – Expressed concerns that electronic security companies could not utilize staff hired through temporary agencies to do office work. Would like to be able to utilize individuals defined as electronic security services employees from a temporary agency.	The only way this can be accomplished is if the temporary agency maintains a private security services business license. Otherwise a statutory amendment would be required.
*Lynn Comer	Public Safety – commented that none of the proposed changes have any impact or only very remotely related to public safety.	The Department thanks you for your comment but believes that the regulations have been well vetted for the purposes of public safety.

<p>*J.C. St. John</p>	<p>Mr. St. John provided detailed comments as a response to the many comments received from the Electronic Security Industry.</p> <p>* disagreed with the suggestion to exempt Electronic Security instructors from the instructor certification requirements.</p> <p>*disagreed that ES subject matter has changed so drastically that no basic training could be developed and offered some resources that could be utilized to establish a basic curriculum.</p> <p>*commented that businesses could conduct their own training with proper credentialing.</p> <p>*disagreed that ES businesses should provide their own training without DCJS oversight</p> <p>*disagreed with the extremes that ES folks suggested in regard to making a single ES category but fundamentally agreed with their overall point.</p> <p>*felt that in-service job related training could be used for both ES categories.</p> <p>*agreed that a compliance agent should be able to work for multiple companies owned and operated by the same person.</p> <p>*questioned why the regulations appear to require persons who work for a PSS business to be an employee.</p>	<p>The Department appreciates your response to other comments presented during the public comment period and evaluated your positions in regard to the issues presented by the electronic security industry.</p>
<p>*Wayne Boggs, Richmond Alarm Company</p>	<p>Comments on other posts – Mr. Boggs provided a direct response to Mr. St. John’s comments in order to reaffirm his position on the electronic security issues as mentioned in his previous comments. Mr. Boggs provided additional information to support the type of training needed for the electronic security industry.</p>	<p>The Department appreciates your response to other comments presented during the public comment period.</p>

<p>*Wayne Boggs, Richmond Alarm Company</p>	<p>Central Station Training and U. L. Listing - Requested that individuals be exempted from minimum training based employment in a Central Station U.L. Listing. (Underwriters Laboratories Listed monitoring center). U. L. is the largest standards and testing laboratory in the world, and the accepted standard for central station operations. Each U. L. listed monitoring center undergoes an annual, on-site inspection by a U. L. engineer who inspects training records, operational procedures, and documentation, and queries operators and supervisors on their knowledge of those operations and procedures. UL Standards 681 and 1981 set forth in some detail the training required for all operators.</p>	<p>According to the Code, the Department may allow for only partial training exemption based on previous experience or training.</p>
<p>*Jimmy Boggs</p>	<p>Instructor Application - 6VAC 20-171-100-5 This is a good idea to make it easier for us to train instructors. This allows someone who is a good technician and a good communicator to now become an Instructor</p>	<p>The Department thanks you for your comment.</p>
<p>*Jimmy Boggs</p>	<p>Guest lecturer - 6VAC 20-171-290-B Guest lecturer. Requested language to allow Electronic and Locksmiths to use Factory Trained Representatives to provide in-service training.</p>	<p>This currently is possible in the regulations as a guest lecturer or subject matter specialist.</p>
<p>*Jimmy Boggs</p>	<p>Course Outlines - 6VAC 20-171-300-B-3 - Course Outline and learning objectives. Most of the electronic industry reps that need to be helping us with training do not have outlines and learning objectives that are in a form that DCJS will accept. If the purpose of the code and regs is to protect the public welfare, then allow those who manufacture the equipment to help us train on how to use it correctly. They always have power point presentations and handouts. That should be enough for in-service training. Not a Complete Lesson Plan.</p>	<p>Course outlines and training objectives are required to ensure that the training meets the minimum compulsory training requirements.</p>
<p>*Lynn Comer</p>	<p>ES and Locksmith Code and Regulations - comments that expressed the need to remove electronic security and locksmiths from under the DCJS regulatory umbrella because they are not a good fit with other categories.</p>	<p>This would require a legislative amendment.</p>
<p>*Cynthia Washburn</p>	<p>Regulation changes. Expressed an opinion that electronic security: alarms and locksmiths should be in a separate group within (or without) DCJS, since our functions vary greatly from others under DCJS. Provided additional support in regard to the need to complete mandated training and felt that having to stay abreast of new technology and new products in order to provide caliber service to clients should be sufficient.</p>	<p>The Department thanks you for your comments.</p>

	<p>Suggested the need to simplify requirements: background check, fingerprinting and a completed locksmith course and/or an apprenticeship and pass an exam, either by the locksmithing school or one that would be available through DCJS.</p> <p>This exam should be created by a small group of competent, knowledgeable locksmiths currently licensed in Virginia and be available on line. Continuing education should be required by employers and records of such submitted to DCJS by the licensee or compliance agent prior to renewal.</p>	
<p>*Martha Clancy Martha Clancy</p>	<p>Regulatory Review – Ms. Clancy thanked the Department for the diligence evidenced in the development of the proposed regulations and offered additional specific recommendations as well as suggested language for grammatical or clarification purposes.</p> <ol style="list-style-type: none"> 1. *Is an applicant required to submit proof of citizenship or legal resident alien status with an application? 2. *What are the definitions of "homeland security" and "documented threat" in 6VAC20-171-190A.4.? 3. *PSS registration and certification cards should be issued with photographs which are updated at each renewal to ensure that physical changes are reflected on these identification cards for security purposes. 4. Certification cards should be issued to every compliance agent and instructor certified by the Department indicating the category(s) in which the individual is certified. 5. Please consider requiring Armed Security Officers to carry a less lethal/intermediate weapon when armed. While there is mention of this as a record requirement, there does not appear to be a stated requirement that each Armed Officer must carry an intermediate weapon while on duty. 6. Training related to PSS-applicable sections of the <i>Code of Virginia</i> and the <i>Regulations Relating to the Private Security Services</i> should not be limited to a specific period of time. In the lesson plan, the 	<p>The Department appreciates your acknowledgement and thanks you for your comments.</p> <ol style="list-style-type: none"> 1. Documentation is submitted with the fingerprint processing application. 2. This language was included into the section that allows for individuals to request an extension to meet renewal requirements. The Department does not feel that defining these terms in the regulation would be all inclusive of the possible circumstances that would occur. 3. The Department is eliminating the practice of issuing state issued photo identification cards and will issue registration cards pursuant to the requirements of the Code. 4. The Department agrees and implemented language to issue certification cards. 5. This would require legislative action. 6. The time requirements for entry-level training are what is required to meet the minimum compulsory training standards. Schools have the option to provide additional training if necessary. In regard to the in-service requirements, this training should be geared towards job related training

	<p>Instructor should determine how most effectively to present this critical information to a specific category of students -emphasizing the content and practical application most pertinent to keeping them legal and in compliance. This applies to both entry-level and in-service training -- new laws and changes in the Regulations also require presentation and explanation to students.</p> <p>7. *Network Administrator - since this person will have access to confidential information regarding PSS personnel, he/she should be required to submit fingerprints for a federal criminal history check. This would also require legislation.</p> <p>8. *Firearms Training - the proposed changes to the entry-level and firearms retraining are drastic and would require excessive time and cost. The current curricula should remain in place.</p> <p>9. *When a registrant is sanctioned with a requirement for remedial training, please add a requirement that the training school and Instructor be notified regarding that student.</p>	<p>and the Department limited how long instruction should be utilized for code and regulatory review. Schools are welcome to provide additional regulatory training once the minimum training requirements have been met for job related topics.</p> <p>7. This would require legislative action.</p> <p>8. The firearms training has been vetted through numerous meetings and workgroup activity with the PSSAB and industry members and the increase to the training has been justified.</p> <p>9. This would go beyond the authority of the Department. Registrants are not employed by schools and as such a school does not have the right to know if a registrants has been sanctioned.</p>
<p>*Vince Apruzzese, AT&T</p>	<p>Regulations applicable to registering and training personnel in electronic security businesses. Provided support to the comments made by the electronic security industry. Pointed out that there should be distinctions between personnel utilized in electronic security businesses. Provided an example that business intend to offer security equipment through retail outlets, utilizing personnel that will <u>not</u>, among other things, go to a prospective customer's home or have access to sensitive information such as passwords or specific equipment placement. The regulations should be reviewed and revised as appropriate to reduce the burdens when businesses contract with in-store personnel who provide typical retail functions.</p> <p>AT&T also agrees with commenters who recommend that electronic security businesses be allowed to provide in-house training. In-house training is a valuable tool for retail sales representatives, in particular. A retail sales person may be one of the first contacts a prospective customer has with an electronic security business, and businesses will have the maximum incentive to train their sales personnel to be responsive and knowledgeable, given the competitive</p>	<p>The Department thanks you for your comments and agreed that some of the changes may require legislative amendments.</p>

	<p>marketplace and customer choice, particularly when it is much easier to leave a retail store than to decline an in-home sales pitch.</p> <p>AT&T looks forward to working with the Division of Criminal Justice Services to review and revise regulations to reflect the current and future state of the electronic security business market.</p>	
*Megan Kelley Explosive Countermeasures International, Inc.	<p>6VAC20 171 10 Private Security Amendments to Regulations – Expressed concerns and recommended amendments pertaining to the regulations of detector canine handlers and handler examiners.</p>	Members of the Department met with Ms. Kelly to address her concerns and concurred with the amendments that she requested.
*Megan Kelley Explosive Countermeasures International, Inc	<p>6VAC20-171-115. Initial detector canine handler examiner certification.</p> <p>We also strongly object to the phrasing included of: 4. <i>“or be sponsored by a certified DCJS private security services detector canine handler examiner”</i>. This verbiage serves no purpose other than to invalidate the first part of the provision.</p> <p>I propose alternate language: 4. Have received a verifiable certification as a detector canine handler examiner or equivalent credential from a department approved national organization, unit of the United States military, or other formal entity.</p>	The Department agrees.
*Megan Kelley Explosive Countermeasures International, Inc	<p>5. <i>Successfully pass a written examination and performance evaluations according to department guidelines;</i></p> <p>No provisions have been proposed as to performance evaluations. How will the department assess the performance of an evaluator? No provisions have been proposed as to who would be qualified to evaluate performance. Where will DCJS obtain a qualified evaluator to evaluate the evaluator? How exactly with the evaluation of an evaluator be conducted?</p>	The Department removed the language from the regulation.
*Megan Kelley Explosive Countermeasures International, Inc	<p>6VAC20-171-350. Entry level training.</p> <p><i>Expressed concern that the training must be completed within 12 months - Prior military training will not be accepted by the department. ECI minimum standards for prior experience is 3 years prior military experience. That would put a minimum of 36 months from training before eligible to work for ECI.</i></p>	If training is completed at a certified training school then application must be submitted within 12 months of training. The 12 months time period is not required for the purposes of training exemptions. This was explained to Ms. Kelley in meetings that were conducted after receiving comments.

	<p>6VAC20-171-445. Training exemptions. We have been advised by DCJS (verbally by phone) that a partial waiver will not be granted since Military Training was over 12 months prior to our submission for licensing/registration/certification. The 12 month limit is superseded and invalidates 9.1-141;</p> <p>The original intention was that core subjects would still be required, Virginia Laws regulations etc.. but that the prior MWD training would be accepted 6VAC20-171-350. Entry level training prevents 9.1-141 from being applied and requires a 160 hour course of 20 year experienced prior MWD handlers.</p>	<p>Again, the 12 month requirement is only for training that is completed at a private security services training school.</p>
<p>*Megan Kelley Explosive Countermeasures International, Inc.</p>	<p>Private Security Advisory Board We object to Detection Canine not being allowed a specific representation seat on the private Security Advisory Board. Detection Canine services are highly specialized and not easily understood nor explained. With very few Detection Canine Companies in the Commonwealth, it is unlikely that one of the 3 seats reserved for Private Security Businesses will be given to a Detection Canine Company.</p>	<p>Representatives from the Detector Canine industry are currently eligible for appointment to the Board in one of the three seats. To specify an individual requirement for a position only for Detector Canine would require a legislative amendment.</p>
<p>*Wayne Boggs</p>	<p>Training Instructor Requirements Recommended that the eligibility requirements for an instructor be removed. - DCJS could accept education and experience as qualifications for issuing the certification as training instructor. This would increase the pool of qualified and experienced instructors and provide better training to registrants.</p>	<p>The Department currently requires that an instructor complete a general instructor development course as well as having experience in the subject in which they are applying to be certified. This is the current practice to accept education and experience.</p>

<p>*Joseph Fasceski, Virginia Financial Investigations, LLC 11-3762</p>	<p>Comments on revised regulations 6VAC 20 171 Regulations relating to Private Security Services. Provided comments on regulations and government in general. Specific recommendations and observations regarding individual regulations are as follows:</p> <ul style="list-style-type: none"> • 6VAC20-171-110, expressed concern in regard to instructors having to complete instructor development within the previous 12 months of a two year registration. • Disagreed with the requirement that firearms instructors must qualify with all weapons and at 85% or 92% for patrol. Did not feel that a firearm instructor should be able to perform and there was no relationship between knowing how to do something and being able to teach it. • Disagreed that armed registrants must complete their annual qualification within 120 of the expiration. • 6VAC20-171-200 Expressed concern that the phrase “or just other cause” in reference to the ability of the department to deny or refuse to issue a credential was too vague and could be selectively used to deny licenses. . • 6VAC20-171-3400 P. 76/80 – expressed concerns in regard to the amount of ammo required. 	<p>Qualification on a firearm is an annual requirement. Individuals will take entry-level and then turn around and take their requalification immediately which could allow for them to go almost two years before they qualify again. This requirement will help eliminate that issue.</p> <p>The Department is required to afford any individual who is sanctioned or denied a credential for just cause an appeal process according to the Administrative Process Act which provides an appeal before the Director the Criminal Justice Services Board</p>
<p>*Elizabeth Ball Townsend, Hanover Security, Inc</p>	<p>Compliance Agent Application Requirements - Ms. Townsend’s comments were in regard to the eligibility of a compliance agent pursuant the Virginia Code and expressed concerns that the criteria would be relaxed.</p>	<p>The eligibility requirements for a compliance agent are established in the Virginia Code, any changes would require statutory amendment and are not being addressed in this regulatory action.</p>
<p>*Paul Ellis on behalf of Jennie McLamb, OMNISEC International Security Services, Inc.</p>	<p>Ms. McLamb provided comments in regard to the online in-service training requirements.. Many of Ms. McLamb’s suggestions were incorporated into the regulations.</p>	<p>The Department thanks you for your time and effort in reviewing the regulations and your recommendations in regard to the online training requirements. Many of Ms. McLamb’s recommendations were incorporated into the final regulatory package.</p>
<p>*Chuck Tobin President AT-RISK International, LLC</p>	<p>1. *Requested to include consulting into the Private security services business" definition.</p>	<p>1. Changes to the private security services definition would require a legislative amendment.</p>

	<p>2. 6VAC20-171-350. Entry level training – Requested that the Department separate the training standards dealing with Code and Regulations into one individual course rather than have it as part of the curriculum in each entry-level training.</p> <p>3. 6VAC20-171-375. [Basic Security officer] handgun training. – Expressed concerns over security officer learning turn and shoot drills and multiple targets. Concerned that it would give them a level of confidence beyond their skill set.</p> <p>4. Thanked the Department for the changes to the Advanced Handgun.</p>	<p>2. Based on public comment it was strongly preferred to have keep the reg and Code training in the individual training segments due to the need for flexibility to gear the subject matter toward the particular category of training being provided (i.e. PI, ESS, etc.). The Department will revisit this issue in the future and plans on establishing curriculum review committees to focus on the individual entry-level training requirements.</p> <p>3. The changes to firearms training was the result of numerous meetings with the training committee of the PSSAB, which included industry members and firearms instructors. The necessity of this training is supported due to the high volume of unnecessary firearm discharges over the last few years and concerns of public safety.</p> <p>4. The Department thanks you for your comments.</p>
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All changes made in this regulatory action

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

Current section number	Proposed new section number, if applicable	Current requirement	Proposed change, rationale, and consequences
6 VAC 20-171-10		Definitions	Amend the term “Assistant training director” insert the word <u>school</u> after the word training.
6 VAC 20-171-10		Definitions	Amend the definition for Certification, delete the word a after the word means and insert <u>the</u> . Insert <u>certified detector canine handler examiners</u> at the end of the sentence pursuant to §9.1-138.
6 VAC 20-171-10		Definitions	Insert the definition for “Classroom training” means <u>instruction conducted by an instructor in person to students in an organized manner utilizing a lesson plan</u> . This definition is needed to establish the difference between classroom and on-line training.
6 VAC 20-171-10		Definitions	Delete the definition of “Combat loading” and “Cruiser safe” these terms are not necessary to have defined in the regulations..
6 VAC 20-171-10		Definitions	Pursuant to §9.1-138 - Insert the definitions for “Detector canine” means <u>any dog that detects drugs</u>

			<p>or explosives.</p> <p><u>"Detector canine handler" means any individual who uses a detector canine in the performance of private security services.</u></p> <p><u>"Detector canine handler examiner" means any individual who examines the proficiency and reliability of detector canines and detector canine handlers in the detection of drugs or explosives.</u></p> <p><u>"Detector canine team" means the detector canine handler and his detector canine performing private security duties.</u></p>
6 VAC 20-171-10		Definitions	<p>Delete the definition for Electronic roster submittal. The Department is moving towards the implementation of a web-based licensing system as well as inserting additional requirements of reporting on the individual applicants. This new process will remove the need to charge an additional fee to the schools since the reporting of training will be shared.</p>
6 VAC 20-171-10		Definitions	<p>Insert the definition for <u>"Electronic images" means an acceptable method of maintaining required documentation through the scanning, storage and maintenance of verifiable electronic copies of original documentation.</u></p>
6 VAC 20-171-10		Definitions	<p>Insert the definition for <u>"Entry-level training" means the compulsory initial training for regulated categories and firearms training standards adopted by the Board for private security services business personnel who are either new registrants or failed to timely complete in-service training or firearms retraining within the prescribed time period.</u></p>
6 VAC 20-171-10		Definitions	<p>Amend the definition of "Firearms training verification" means verification of successful completion of either initial or retraining requirements for handgun, or shotgun or patrol rifle training, or both.</p>
6 VAC 20-171-10		Definitions	<p>Amend the definition for "Firm" means a business entity, regardless of method of organization, applying for a an initial or renewal private security services business license or for the renewal or reinstatement of same private security services training school certification.</p>
6 VAC 20-171-10		Definitions	<p>Inset the definition for <u>"Intermediate weapon" means a tool not fundamentally designed to cause deadly force with conventional use. This would exclude all metal ammunition firearms and/or edged weapons. These weapons include but are not limited to: baton/collapsible baton; chemical irritants; electronic restraining devices; projectiles and other less-lethal weapons as defined by the department.</u></p>
6 VAC 20-171-10		Definitions	<p>Insert the definition for <u>"Job-related training" means</u></p>

			<u>training specifically related to the daily job functions of a given category of registration or certification as defined in this chapter. Certifiable job-related training may include a maximum of 1 hour of instruction dedicated to the review of regulations.</u>
6 VAC 20-171-10		Definitions	Insert definition for “ <u>key cutting</u> ” means making duplicate keys from an existing key and includes no other locksmith services pursuant to §9.1-138.
6 VAC 20-171-10		Definitions	Insert definition for ““ <u>Learning Management System (LMS)</u> ” means a software application or Web-based technology used to plan, implement, monitor, and assess a specific learning process.
6 VAC 20-171-10		Definitions	Delete the definition for Locksmith security equipment
6 VAC 20-171-10		Definitions	Insert definition for “ <u>locksmith</u> ” means any individual that performs locksmith services, or advertises or represents to the general public that the individual is a locksmith even if the specific term locksmith is substituted with any other term by which a reasonable person could construe that the individual possesses special skills relating to locks or locking devices, including use of the words lock technician, lockman, safe technician, safeman, boxman, unlocking technician, lock installer, lock opener, physical security technician or similar descriptions. pursuant to §9.1-138.
6 VAC 20-171-10		Definitions	Insert definition “ <u>locksmith services</u> ” mean selling, servicing rebuilding, repairing, rekeying, repinning, changing the combination to an electronic or mechanical locking device; programming either keys to a device or the device to accept electronic controlled keys; originating keys for locks or copying keys; adjusting or installing locks or deadbolts, mechanical or electronic locking devices, egress control devices, safes, and vaults; opening, defeating or bypassing locks or latching mechanisms in a manner other than intended by the manufacturer; with or without compensation for the general public or on property not his own nor under his own or authority. pursuant to 9.1-138
6 VAC 20-171-10		Definitions	Insert definition “ <u>Network administrator</u> ” means an individual designated by a certified training school that provides online training who serves as the technical contact between the department and the certified training school.
6 VAC 20-171-10		Definitions	Insert definition “ <u>On-line training</u> ” means training approved by the department and offered via the internet or an intranet for the purpose of remote access on-demand or distance training that meets all requirements for compulsory minimum training standards.

6VAC20-171-10		Definitions	Delete the proposed definition for open breach loading. This term is not necessary to have defined.
6 VAC 20-171-10		Definitions	Amend the definition of "Private security services business" to include the business category of locksmiths and canine categories. "Private security services business" means any person engaged in the business of providing, or who undertakes to provide, armored car personnel, security officers, personal protection specialists, private investigators, couriers, security canine handlers, security canine teams, detector canine handlers, detector canine teams, alarm respondents, locksmiths, central station dispatchers, electronic security employees, electronic security sales representatives or electronic security technicians and their assistants to another person under contract, express or implied.
6 VAC 20-171-10		Definitions	Amend the definition of "Private security services business personnel" to include the registration category of locksmith and detector canine handler.
6 VAC 20-171-10		Definitions	Amend the definition of "Private security services registrant" to include the registration category of locksmith and detector canine handler. Insert locksmith after the words alarm respondents and detector canine handler after the words security canine handler pursuant to §9.1-138
6 VAC 20-171-10		Definitions	Amend the definition of "Reciprocity" means the relation existing between Virginia and any other state, commonwealth or providence <u>province</u> as established by agreements approved by the board.
6 VAC 20-171-10		Definitions	Amend the definition of "Recognition" means the relation of accepting various application requirements between Virginia and any other state, commonwealth or providence <u>province</u> as established by agreements approved by the board.
6 VAC 20-171-10		Definitions	Amend the definition of "Registration category" to include the category of <u>detector canine handler</u> and <u>locksmith</u> pursuant to §9.1-138. "Registration category" means any one of the following categories: (i) unarmed security officer and armed security officer/courier, (ii) security canine handler, (iii) armored car personnel, (iv) private investigator, (v) personal protection specialist, (vi) alarm respondent, (vii) central station dispatcher, (viii) electronic security sales representative, or (ix) electronic security technician, or (x) electronic security technician's assistant, (xi) <u>detector canine handler</u> or (xii) <u>locksmith</u> .

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

Part II - Application Fees			
6VAC20-171-20.		Fees	Amend the fee structure to include an option for businesses to obtain a one year or two year initial license, an additional category fee for training schools and instructors and a separation of certification application fees and required regulatory compliance training fees. The electronic roster submittal fee has been deleted and instructor training development fees have been removed from the regulation. There is also a new manual processing service fee for applications not submitted by available electronic methods. Strike all references to photo identification cards and other amendments involve a restructuring of the fee schedule for clarity.
		<p>CATEGORIES</p> <p><u>CRIMINAL HISTORY RECORDS CHECK</u></p> <p><u>Fingerprint Processing Application</u></p> <p><u>LICENSE</u></p> <p>Initial business license</p> <p> <u>1 Year License</u></p> <p> <u>2 Year License</u></p>	<p>FEEES</p> <p><u>\$50.00</u></p> <p><u>\$800</u></p> <p><u>\$550</u></p> <p><u>\$800</u></p>

Business license renewal (<u>2 Year License</u>)	\$500
Business license category fee	\$50
<u>CERTIFICATIONS</u>	-
Initial compliance agent certification (includes training)	\$100 \$50
Compliance agent certification renewal (includes training)	\$50 \$25
- Initial registration	\$25
- Registration renewal	\$20
- Firearms endorsement (annual)	\$10
Initial training school	\$800
Training school renewal	\$500
<u>Training school category fee</u>	\$50
Training school electronic roster submittal authorization	\$500
Initial instructor certification	\$100\$50
Instructor certification renewal	\$50 \$25
<u>Instructor certification category fee</u>	\$10
<u>Initial Detector Canine Handler Examiner certification</u>	\$50
<u>Detector Canine Handler Examiner Certification renewal</u>	\$25
Initial certification	\$25
Certification renewal	\$20
<u>REGISTRATION</u>	
<u>Initial registration</u>	\$25
<u>Registration renewal</u>	\$20
<u>Additional registration category form</u>	\$20
<u>Replacement photo identification registration card</u>	\$20
<u>TRAINING RELATED</u>	
<u>Firearm Endorsement</u>	\$10
<u>Application for Entry Level partial -training exemption</u>	\$25
<u>In Service Training Alternative Credit Evaluation</u>	\$25
<u>Regulatory Compliance entry-level training</u>	\$75
<u>Regulatory Compliance In-service training</u>	\$50
- Fingerprint card processing	\$50
- Additional registration category form	\$20
- Replacement photo identification letter	\$15
Training completion roster form	\$30
General instructor development course	\$300
General instructor in service training	\$50
Firearms instructor development course	\$300
Firearms instructor in service training	\$50
Technical assistant training	\$50

6VAC20-171-20B1		Fees	Insert language for clarity – referring constituents to reinstatement provision. B. Reinstatement fee. 1. The department shall collect a reinstatement fee for registration, license, or certification renewal applications not received on or before the expiration date of the expiring registration, license, or certification pursuant to 6VAC 20-171-180.
6VAC20-171-20C		Fees	Amend for grammar. C. Dishonor of fee payment due to <u>nonsufficient</u> <u>insufficient</u> funds.

6VAC20-171-20C1		Fees	<p>Strike unneeded language: 1. The department may suspend the registration, license, certification, or authority it has granted any person, licensee or registrant who submits a check or similar instrument for payment of a fee required by statute or regulation which is not honored by the financial institution upon which the check or similar instrument is drawn.</p>
6VAC20-171-20C2		Fees	<p>Strike accompany and Insert accompanies after the word regulation in the second sentence.</p>
6VAC20-171-20	D	Fees	<p>Insert subsection in order to provide an explanation of the manual processing service fee. The Department is moving towards a web-based licensing system and the including a fee will reduce the excessive amounts of paperwork when the system will allow for electronic submittal. This will enable to department to provide more efficient and effective service to the industry.</p> <p><u>D. Manual processing service fee. The department shall collect a \$5.00 service fee for any applications under this chapter that are submitted to the department by other means than the available electronic methods established by the department.</u></p>
6VAC20-171-30A		Fingerprint processing.	<p>Insert <u>detector canine handler examiner</u> certification pursuant to 9.1-138 et seq. and strike the language “or private security certificate” in the last sentence for grammatical purpose.</p> <p>A. On or before the first date of hire, each person applying for licensure as a private security services business, including principals, supervisors, and electronic security employees; certification as a private security services training school; certification as a compliance agent, <u>detector canine handler examiner</u> or instructor; or a private security registration or private security certification shall submit to the department:</p>
6VAC20-171-30A1		Fingerprint processing.	<p>Amend to reflect current process. The Department moved to a scanning process in which only one card is scanned and then electronically submitted to the state police and the FBI.</p> <p>1. Two<u>One</u> completed fingerprint card<u>card</u> provided by the department or another electronic method approved by the department;</p>
6VAC20-171-30C		Fingerprint processing.	<p>Amend paragraph to reflect the current process.</p> <p>C. Fingerprints cards found to be unclassifiable will be returned to the applicant. Action on the application will be suspended <u>suspend all action on</u></p>

			<p>the application pending the resubmittal resubmission of a classifiable fingerprint cards card. The applicant shall be so notified in writing and shall <u>must</u> submit a new fingerprint cards card and the applicable, nonrefundable fee to the department within 30 days of notification before the processing of his application shall resume. However, no such fee may be required if the rejected fingerprint cards are included and attached to the new fingerprint cards when resubmitted and the department is not assessed additional processing fees. If a fingerprint card is not submitted within the 30 days, the initial fingerprint application process will be required to include applicable application fees.</p>
6VAC20-171-30E		Fingerprint processing.	<p>Insert paragraph to reflect current policy within the department. Criminal history checks are a point in time review. Applicants are required to submit for a criminal history check and some categories of registration have up until 120 days to complete the registration process. <u>E. Fingerprint applications will be active for 120 days from the date of submittal. Application for licenses, registrations and certifications must be submitted within that 120 day period or initial fingerprint submittal will be required.</u></p>
6VAC20-171-50B1		Initial business license application.	<p>Insert fingerprint requirement for electronic security services employee pursuant to §9.1-145. B. 1. For each principal and supervisor of the applying business, their fingerprints pursuant to 6VAC20-171-30; <u>for each electronic security employee of an electronic security services business, their fingerprints pursuant to 6VAC20-171-30;</u></p>
6VAC20-171-50B2		Initial business license application.	<p>Amend to clarify insurance requirements. 2. Documentation verifying that the applicant has secured a surety bond in the amount of \$100,000 executed by a surety company authorized to do business in Virginia, or a certificate of insurance reflecting the department as a certificate holder, showing a policy of comprehensive general liability insurance with a minimum coverage of \$100,000 <u>per individual occurrence</u> and \$300,000 <u>general aggregate</u> issued by an insurance company authorized to do business in Virginia;</p>

6VAC20-171-50B4		Initial business license application.	Amend to allow for the department to implement electronic application submittal. 4. For each applicant for a license as a private security services business except sole proprietor or partnership, on a form provided by the department the identification number issued by the Virginia State Corporation Commission for verification that the entity is authorized to conduct business in the Commonwealth;
6VAC20-171-50B5		Initial business license application.	Reinsert paragraph. 5. A physical address in Virginia where records required to be maintained by the Code of Virginia and this chapter are kept and available for inspection by the department. A post office box is not a physical address;
6VAC20-171-50B6	B5	Initial business license application.	Renumber subsection and strike the language in reference to compliance agent not being designated for another licensee. 65. 6. 6. On the license application, designation of at least one individual as compliance agent who is not designated as compliance agent for any other licensee, and who is certified or eligible for certification pursuant to 6VAC20-171-70;
6VAC20-171-50B7	B6	Initial business license application.	Renumber subsection 76. 7. 7. The applicable, nonrefundable license application fee; and
6VAC20-171-50B8	B7	Initial business license application.	Renumber subsection, amend language for clarity and insert business categories of private security services pursuant to §9.1-138 87. 8. 8. Designation on the license application of the type of private security business license the applicant is seeking. The initial business license fee includes one category. A separate fee will be charged for each additional category. The separate categories are identified as follows: security officers/couriers (armed and unarmed), private investigators, electronic security <u>personnel</u> , armored car <u>personnel</u> , personal protection specialists, <u>locksmiths</u> , <u>detector canine handlers</u> and security canine handlers. Alarm respondents crossover into both the security officer and electronic security category; therefore, if an applicant is licensed in either of these categories, he can provide these services without purchasing an additional category <u>fee</u> .
6VAC20-171-50E		Initial business license application.	Insert specific descriptions of what changes would constitute a new legal entity. The department receives numerous inquiries that reflect the need to provide specificity in the regulations. E. A new license is required whenever there is any

			<p>change in the ownership or type of organization of the licensed entity that results in the creation of a new legal entity. <u>Such changes include but are not limited to:</u></p> <ol style="list-style-type: none"> 1. <u>Death of a sole proprietor;</u> 2. <u>Death or withdrawal of a general partner in a general partnership or the managing partner in a limited partnership; and</u> 3. <u>Formation or dissolution of a corporation, a limited liability company, or an association or any other business entity recognized under the laws of the Commonwealth of Virginia.</u>
6VAC20-171-50F		Initial business license application.	<p>Strike exception. This exception did not provide for consistency for all licensees.</p> <p>F. Each license shall be issued to the legal business entity named on the application, whether it be <u>is</u> a sole proprietorship, partnership, corporation, or other legal entity, and shall be valid only for the legal entity named on the license. No license shall be assigned or otherwise transferred to another legal entity, with the exception of a sole proprietorship or partnership that incorporates to form a new corporate entity where the initial licensee remains as a principal in the newly formed corporation. This exception shall not apply to any existing corporation that purchases the business or assets of an existing sole proprietorship.</p>
6VAC20-171-60		Renewal license application	<p>Amend title to read: Renewal <u>business</u> license application.</p>
6VAC20-171-60C2		Renewal license application.	<p>Amend to clarify insurance requirements.</p> <p>2. Documentation verifying that the applicant has secured a surety bond in the amount of \$100,000 executed by a surety company authorized to do business in Virginia, or a certificate of insurance reflecting the department as a certificate holder, showing a policy of comprehensive general liability insurance with a minimum coverage of \$100,000 <u>per individual occurrence</u> and \$300,000 <u>general aggregate</u> issued by an insurance company authorized to do business in Virginia;</p>
6VAC20-171-60C5		Renewal license application.	<p>Insert language for clarity of fee requirements</p> <p>C. 5. The applicable, nonrefundable license renewal fee <u>and applicable category of service fees; and and</u></p>
6VAC20-171-60C6		Renewal license application.	<p>Delete the proposed language (and)</p> <p>6. On the first day of employment, each new and additional supervisor's fingerprints submitted to the</p>

			department pursuant to § <u>9.1-139</u> H of the Code of Virginia; and
6VAC20-171-60C	7	Renewal license application.	Delete inserted language requiring a new provision that businesses complete a self audit at time of renewal. 7. A completed business license self audit form issued by the Department.
6VAC20-171-60D		Renewal license application.	Amend subsection for clarity and to remove duplicate language. A compliance agent is held to the same standard under the Compliance agent requirements. In addition, the requirement was too broad the department added the language “in a private security services or related field”, which reflected the industries under the Board’s purview. D. Each principal and compliance agent listed on the business applying for a license renewal application shall be in good standing in every jurisdiction where licensed, registered or certified <u>in a private security services or related field</u> . This subsection shall not apply to any probationary periods during which the individual is eligible to operate under the license, registration or certification.
6VAC20-171-70		Compliance agent training and certification	Amend section title. The Training requirements have been established under a new subsection. Compliance agent training and certification requirements .
6VAC20-171-70B2		Compliance agent training and certification	Amend to reflect current procedure. Cards are now scanned by the Department and only one card is required. B. 2. Fingerprint cards <u>card</u> pursuant to 6VAC20-171-30;
6VAC20-171-70C		Compliance agent training and certification	Strike paragraph, this language is relocated to a new section 6 VAC 20-171-72 C. Following review of all application requirements, the department shall assign the applicant to an entry level compliance agent training session provided by the department, at which the applicant must successfully complete the applicable entry level compliance agent training requirements pursuant to this chapter and achieve a passing score of 80% on the compliance agent examination.
6VAC20-171-70	C 1-4	Compliance agent training	Insert new language to reflect the application process, this information was never clearly outlined

		and certification	<p>in the regulations.</p> <p><u>C. The department may issue a certification for a period not to exceed 24 months when the following are received by the department:</u></p> <ol style="list-style-type: none"> <u>1. A properly completed application provided by the department;</u> <u>2. The applicable, nonrefundable certification fee;</u> <u>3. Verification of eligibility pursuant to §9.1-139 (A) of the Code of Virginia; and</u> <u>4. Verification of satisfactory completion of department regulatory compliance entry-level training requirements pursuant to 6VAC20-171-72 of this chapter.</u>
6VAC20-171-70D		Compliance agent training and certification	<p>Strike paragraph, this language is relocated to a new section 6 VAC 20-171-71 which outlines the renewal process.</p> <p>D. Following completion of the entry level training requirements, the compliance agent must complete in-service training pursuant to the compulsory minimum training standards set forth by this chapter.</p>
6VAC20-171-70	D	Compliance agent training and certification	<p>Reformat outline</p> <p>D. Each compliance agent shall comply with all applicable administrative requirements and standards of conduct and shall not engage in any acts prohibited by applicable sections of the Code of Virginia and this chapter.</p>
6VAC20-171	<u>6VAC20-171-71.</u>	<u>Compliance Agent Certification Renewal Requirements</u>	<p>Insert entire section. This process was spread throughout the regulations in different sections. This section will specifically focus on the renewal requirements for compliance agents and thus provide for a clear, concise process, eliminating confusion.</p> <p><u>6VAC20-171-71. Compliance agent certification renewal requirements.</u></p> <p><u>A. Applications for certification renewal should be received by the department at least 30 days prior to expiration. The department will provide a renewal notification to the last known mailing address or email address provided by the certified compliance agent. However, if a renewal notification is not received by the compliance agent, it is the responsibility of the compliance agent to ensure renewal requirements are filed with the department. Certification renewal applications received by the department after the expiration date shall be subject to all applicable,</u></p>

			<p><u>nonrefundable renewal fees plus reinstatement fees.</u></p> <p><u>B. Each person applying for compliance agent certification renewal shall meet the minimum requirements for eligibility as follows:</u></p> <p><u>1. Successfully apply on an application provided by the department, and complete the in-service regulatory compliance agent classroom training session provided by the department, or successfully complete an approved online in-service training session pursuant to 6VAC20-171-72. Training must be completed within the 12 months immediately preceding the expiration date of the current certification pursuant to the certification training standards in 6VAC20-171-72; and</u></p> <p><u>2. Be in good standing in every jurisdiction where licensed, registered, or certified in private security services or related field. This subdivision shall not apply to any probationary periods during which the individual is eligible to operate under the license, registration, or certification.</u></p> <p><u>C. The department may renew a certification for a period not to exceed 24 months.</u></p> <p><u>D. The department may renew a certification when the following are received by the department:</u></p> <p><u>1. A properly completed renewal application provided by the department;</u></p> <p><u>2. The applicable, nonrefundable certification renewal fee; and</u></p> <p><u>3. Verification of satisfactory completion of department regulatory compliance agent in-service training pursuant to 6VAC20-171-72.</u></p> <p><u>E. Any renewal application received after the expiration date of a certification shall be subject to the requirements set forth by the reinstatement provisions of this chapter.</u></p>
	<p><u>6VAC20-171-72.</u></p>	<p><u>Compliance Agent Regulatory Compliance Training Requirements.</u></p>	<p>Insert entire section. This process was spread throughout the regulations in different sections. This section will specifically focus on the training requirements for compliance agents and thus provide for a clear, concise process, eliminating confusion.</p> <p><u>6VAC20-171-72. Compliance agent regulatory compliance training requirements.</u></p> <p><u>A. Each eligible person applying to attend a regulatory compliance entry-level or in-service</u></p>

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

		application.	5. A physical location in Virginia where records required to be maintained by the Code of Virginia and this chapter are kept and available for inspection by the department. A post office box is not a physical location;
6VAC20-171-80B6-11	5-7	Initial training school application.	Renumber subsections 65. <u>6.</u> On the training school certification application, designation of at least one individual as training director who is not designated as training director for any other training school, and who is certified as an instructor pursuant to Article 5 (6VAC20-171-100 et seq.) of this part. A maximum of four individuals may be designated as an assistant training director; 76. <u>7.</u> A copy of the curriculum in course outline format for each category of training to be offered, including the hours of instruction with initial and in-service courses on separate documents; 87. <u>8.</u> A copy of the training school regulations;
6VAC20-171-80B9		Initial training school application.	Delete requirement 9. A copy of the training completion certificate to be used by the training school;
6VAC20-171-80B10	8	Initial training school application.	Renumber 10-9. <u>9.</u> A copy of the range regulations to include the assigned DCJS range identification number if firearms training will be offered; and
6 VAC20-171 80B	11	Initial training school application	Delete inserted language 40. The applicable nonrefundable training school certification application fee.
6VAC20-171-80B	10-12	Initial training school application.	Insert new subsection that lists the categories of training for private security services training schools in which a fee is required for each additional category requested. <u>9. 10. On the certification application, selection of the category of training the applicant is seeking to provide. The initial training school certification application fee includes one category. A separate fee will be charged for each additional category of training. The separate categories are identified as follows: (i) security officers/couriers/alarm respondent (armed and unarmed) to include arrest authority, (ii) private investigators, (iii) locksmiths, electronic security personnel to include central station dispatchers, (iv) armored car personnel, (v) personal protection specialists, (vi) detector canine handlers, security canine handlers, (vii) special conservators of the peace pursuant to § 9.1-150 of the Code of Virginia, (viii) bail bondsmen pursuant</u>

			<p><u>to § 9.1-185 of the Code of Virginia, bail enforcement agents pursuant to § 9.1-186 of the Code of Virginia and (ix) firearms.</u></p> <p><u>10. 11. The applicable, nonrefundable category fee; and</u></p> <p><u>14. 12. The applicable, nonrefundable school certification application fee.</u></p>
6VAC20-171-80C		Initial training school application.	<p>Amend the paragraph to reflect current procedures</p> <p>C. When the department has received and processed a completed application and accompanying material, the department shall <u>may</u> inspect the training facilities to ensure conformity with department policy, including an inspection of the firearms range, if applicable, to ensure conformity with the minimum requirements set forth by this chapter.</p>
6VAC20-171-80F		Initial training school application.	<p>Insert specific descriptions of what changes would constitute a new legal entity. The department receives numerous inquiries that reflect the need to provide specificity in the regulations.</p> <p>F. A new certification is required whenever there is any change in the ownership or type of organization of the certified entity that results in the creation of a new legal entity. <u>Such changes include but are not limited to:</u></p> <ol style="list-style-type: none"> <u>1. Death of a sole proprietor;</u> <u>2. Death or withdrawal of a general partner in a general partnership or the managing partner in a limited partnership; and</u> <u>3. Formation or dissolution of a corporation, a limited liability company, or an association or any other business entity recognized under the laws of the Commonwealth of Virginia.</u>
6VAC20-171-80G		Initial training school application.	<p>Strike exception. This exception did not provide for consistency for all schools.</p> <p>G. Each certification shall be issued to the legal entity named on the application, whether it be <u>is</u> a sole proprietorship, partnership, corporation, or other legal entity, and shall be valid only for the legal entity named on the certification. No certification shall be assigned or otherwise transferred to another legal entity, with the exception of a sole proprietorship or partnership that incorporates to form a new corporate entity</p>

			<p>where the initial licensee remains as a principal in the newly formed corporation. This exception shall not apply to any existing corporation that purchases the training school or assets of an existing sole proprietorship.</p>
6VAC20-171-90A		Renewal training school application.	<p>Insert the requirement that schools provide an email address to the department. This is an attempt to move towards a paperless system.</p> <p>A. Applications for certification renewal should be received by the department at least 30 days prior to expiration. The department will provide a renewal notification to the last known mailing address of <u>or email address provided by the certified training school.</u></p>
6VAC20-171-90C2		Renewal training school application.	<p>Amend to clarify insurance requirements.</p> <p>2. Documentation verifying that the applicant has secured a surety bond in the amount of \$100,000 executed by a surety company authorized to do business in Virginia, or a certificate of insurance reflecting the department as a certificate holder, showing a policy of comprehensive general liability insurance with a minimum coverage of \$100,000 <u>per individual occurrence</u> and \$300,000 <u>general aggregate</u> issued by an insurance company authorized to do business in Virginia;</p>
6VAC20-171-90C5		Renewal training school application.	<p>Insert language for clarity of fee requirements.</p> <p>5. The applicable, nonrefundable certification renewal fee- <u>and category fees; and</u></p>
6VAC20-171-90C6		Renewal training school application.	<p>Insert language for clarity of fee requirements and reference the section that specifies the categories of training.</p> <p><u>6. Any documentation required pursuant to 6VAC20-171-80 for any new categories of training; and</u></p>
6VAC20-171-90C7		Renewal training school application.	<p>Delete inserted requirement for schools to conduct a self audit at time of renewal.</p> <p>7. A completed training school certification self audit form issued by the Department.</p>
6VAC20-171-90D		Renewal training school application.	<p>Amend subsection for clarity and to remove duplicate language. An instructor is held to the same standard under the Instructor requirements. In addition, the requirement was too broad, the department added the language "in a private</p>

			<p>security services or related field”, which reflected the industries under the Board’s purview</p> <p>D. Each principal and instructor listed on the training school applying for a license certification renewal application shall be in good standing in every jurisdiction where licensed, registered or certified in private security services or related field. This subsection shall not apply to any probationary periods during which the individual is eligible to operate under the license, registration or certification.</p>
6VAC20-171-90E		Renewal training school application.	<p>Insert language for clarity – referring constituents to reinstatement provision.</p> <p>E. Any renewal application received after the expiration date of a certification shall be subject to the requirements set forth by the reinstatement provisions of this chapter pursuant to 6 VAC 20-20-171-180.</p>
6VAC20-171-100A		Initial instructor application.	<p>Amend sentence to correct grammar.</p> <p>A. Each person applying for certification as <u>an</u> instructor shall meet the following minimum requirements for eligibility:</p>
6VAC20-171-100A4		Initial instructor application.	<p>Amend sentence to correct grammar.</p> <p>4. Have a minimum of (i) three years management or supervisory experience with a private security services business or with any federal, military police, state, county or municipal law-enforcement agency, or in a related field; or (ii) five years general experience in a private security services business, with a federal, state or local law-enforcement agency, or in a related field; or (iii) one year experience as an instructor or teacher at an accredited educational institution or agency in the subject matter for which certification is requested, or in a related field; and</p>
6VAC20-171-100A5		Initial instructor application.	<p>Insert sentence to reflect current eligibility requirements, this information was previously listed under B4 of this section.</p> <p><u>5. Have previous training and a minimum of two years work experience for those subjects in which certification is requested; and</u></p>
6VAC20-171-100A5	A6	Initial instructor application.	<p>Renumber</p> <p>56. Be a United State<u>States</u> citizen or legal resident alien of the United States.</p>

6VAC20-171-100B		Initial instructor application.	<p>Amend to correct grammar.</p> <p>B. Each person applying for certification as <u>an</u> instructor shall file with the department:</p>
6VAC20-171-100B2.		Initial instructor application.	<p>Amend to reflect current process. The Department utilizes scanning procedures which removes the need for two cards.</p> <p>2. Fingerprint cards <u>card</u> pursuant to 6VAC20-171-30;</p>
6VAC20-171-100B4.		Initial instructor application.	<p>Strike paragraph, the requirement was inserted under section 100A</p> <p>4. Official documentation verifying previous instructor experience, training, work experience and education for those subjects in which certification is requested. The department will evaluate qualifications based upon the justification provided;</p>
6VAC20-171-100B.	4	Initial instructor application.	<p>Insert new subsection that lists the categories of training for private security services instructors in which a fee is required for each additional category requested.</p> <p><u>4. On the certification application, selection of the category of training the applicant is seeking to provide. The initial instructor certification fee includes one category. A separate fee will be charged for each additional category of training. The separate categories are identified as follows: (i) security officers/couriers/alarm respondent (armed and unarmed) to include arrest authority, (ii) private investigators, (iii) locksmiths, electronic security personnel to include central station dispatchers, (iv) armored car personnel, (v) personal protection specialists, (vi) detector canine handlers, security canine handlers, (vii) special conservators of the peace pursuant to § 9.1-150 of the Code of Virginia, (viii) bail bondsmen pursuant to § 9.1-185 of the Code of Virginia, bail enforcement agents pursuant to § 9.1-186 of the Code of Virginia and (ix) firearms;</u></p>
6VAC20-171-100B5.	B5	Initial instructor application.	<p>Amend to include category fee requirements</p> <p>5. The applicable, nonrefundable <u>instructor certification application fee and category fee(s) if applicable;</u> and</p>
6VAC20-171-100	C	Initial instructor application.	<p>Delete the inserted subsection to provide for entry-level compliance regulatory training procedures:</p> <p>C. Following review of all application requirements, the department shall verify eligibility</p>

			and authorize the applicant to submit a regulatory compliance training enrollment application for an entry level instructor regulatory compliance classroom training session provided by the department, or approve the applicant for taking the approved online training session pursuant to 6VAC20-171-111, at which the applicant must successfully complete the applicable entry level regulatory compliance training requirements pursuant to this chapter and achieve a passing score of 80% on the regulatory compliance examination.
6VAC20-171-100C	D	Initial instructor application.	Amend due to reformatting C-D. C. In addition to the instructor qualification requirements described in subsections A and B through C and B of this section, each applicant for certification as a firearms instructor shall submit to the department:
6VAC20-171-100D2.		Initial instructor application.	Insert language for firearms instructors. This amendment is upon the recommendation of members of the industry and the Private Security Services Advisory Board to ensure the proper competency of the firearms instructors. Additional language has been inserted to reflect a course of fire for patrol rifle. 2. Official documentation <u>in the form of a signed, dated range sheet with the qualification score and course of fire</u> that the applicant has successfully qualified, with a minimum range qualification of 85%, with each of the following: a. A revolver; b. A semi-automatic handgun; and c. A shotgun.

<p>6VAC20-171-100D3.</p>	<p>D3-5</p>	<p>Initial instructor application.</p>	<p>Insert language for firearms instructors. This amendment is upon the recommendation of members of the industry and the Private Security Services Advisory Board to ensure the proper competency of the firearms instructors. Additional language has been inserted to reflect a course of fire for patrol rifle.</p> <p><u>3. Firearms instructors applying to provide patrol rifle training in accordance with 6 VAC 20-171-395 must submit official documentation in the form of a signed, dated range sheet that the applicant has successfully qualified, with a minimum range qualification of 85%, with a patrol rifle.</u></p> <p><u>4. Range qualifications must have been completed within the 12 months immediately preceding the instructor application date and have been completed at a Virginia criminal justice agency, training academy, correctional facility or a department approved range utilized by a certified private security training school. The qualifications must be documented by another instructor certified as a law enforcement firearms instructor or private security services firearms instructor.</u></p> <p>35. The firearms instructor training must have been completed within the three years immediately preceding the date of the instructor application; or in the event that the school completion occurred prior to three years, the applicant shall have provided firearms instruction during the three years immediately preceding the date of the instructor application.</p>
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<p>6VAC20-171-100D-G.</p>	<p>E-H</p>	<p>Initial instructor application.</p>	<p>Reformat D-E. D. Upon completion of the initial instructor application requirements, the department may issue an initial certification for a period not to exceed 24 months. E-F. E. The department may issue a letter of temporary certification to instructors for not more than 120 days while awaiting the results of the state and national fingerprint search provided the applicant has met the necessary conditions and requirements. F-G. F. Each certification shall be issued to the individual named on the application and shall be valid only for use by that individual. No certification shall be assigned or otherwise transferred to another individual. G-H. G. Each instructor shall comply with all applicable administrative requirements and standards of conduct and shall not engage in any acts prohibited by applicable sections of the Code of Virginia and this chapter.</p>
<p>6VAC20-171-110A</p>		<p>Renewal instructor application.</p>	<p>Insert the requirement that instructors provide an email address to the department. This is an attempt to move towards a paperless system. A. Applications for certification renewal should be received by the department at least 30 days prior to expiration. The department will provide a renewal notification to the last known mailing address of <u>or email address provided by the</u> certified instructor.</p>
<p>6VAC20-171-110B1</p>		<p>Renewal instructor application.</p>	<p>Strike the reference to section 360. The training requirements have been included in this section under B2. Stike newly inserted language. B. 1. Successfully complete the in-service training regulatory compliance classroom or online training session provided by the department within the 12 months immediately preceding the expiration date of the current certification; pursuant to the compulsory minimum training standards in 6VAC20-171-360; and</p>
<p>6VAC20-171-110B</p>	<p>B2</p>	<p>Renewal instructor application.</p>	<p>Insert continuing education requirement, this provision relocated from section 6VAC20-171-360. Renumber paragraph 2. <u>2. 1. Successfully complete a minimum of 4 hours of continuing education in instructor development. Training must be completed within the 12 months immediately preceding the expiration date of the current certification; and</u></p>

6VAC20-171-110B.3		Renewal instructor application	Delete inserted language 3. Successfully complete a minimum of 2 hours of professional development for topics related to each category of instructor certification during the certification period; and this language has been moved to administrative requirements.
6VAC20-171-110B4		Renewal instructor application.	Insert language for specificity and renumber for formatting. The requirement was too broad, the department added the language “in a private security services or related field”, which reflected the industries under the Board’s purview 2. 3.2. Be in good standing in every jurisdiction where licensed, registered or certified <u>in a private security services or related field</u> . This subdivision shall not apply to any probationary periods during which the individual is eligible to operate under the license, registration or certification.
6VAC20-171-110D1-2		Renewal instructor application.	Amend for grammatical purpose. D.1. A properly completed renewal application provided by the department; and 2. The applicable, nonrefundable certification renewal fee- and applicable category fees;
6VAC20-171-110D	D3-8	Renewal instructor application.	Insert specific requirements for instructor renewal. Section 3 and 6 are new requirements. Members of the industry as well as the Private Security Services Advisory Board training committee recommended additional continuing education and specific documentary evidence for firearms instructors in order to ensure continued competency in the categories of service the instructor was certified to instruct. Delete the proposed language of number 4 and reformat numbering. <u>3. Any documentation required pursuant to 6VAC20-171-100 for any new categories of training.</u> 4. Verification of satisfactory completion of regulatory compliance in service training provided by the department. <u>5 4. Verification of satisfactory completion of instructor development continuing education requirements;</u> <u>6. 5. For firearms instructors, official documentation in the form of a signed, dated range sheet along with the qualification score and course of fire, with a minimum range qualification of 85%, with each of the following:</u> <u>a. A revolver;</u>

			<p>b. <u>A semi-automatic handgun; and</u></p> <p>c. <u>A shotgun.</u></p> <p><u>7. 6. Firearms instructors applying to provide patrol rifle training in accordance with 6VAC20-171-395 must submit official documentation in the form of a signed, dated range sheet that the applicant has successfully qualified, with a minimum range qualification of 85%, with a patrol rifle.</u></p> <p><u>8. 7. Range qualifications must have been completed within the 12 months immediately preceding the instructor application date and have been completed at a Virginia criminal justice agency, training academy, correctional facility, or a department approved range utilized by a certified private security training school. The qualifications must be documented by another instructor certified as a law-enforcement firearms instructor or private security services firearms instructor.</u></p>
<p>6VAC20-171-110 E</p>		<p>Renewal instructor application</p>	<p>Delete of this chapter and insert pursuant to 6VAC20-171-180</p>
	<p><u>6VAC20-171-111.</u></p>	<p><u>Instructor Regulatory Compliance Training Requirements.</u></p>	<p>Delete inserted section – this training will be included in general instructor developmental training requirements.</p> <p><u>6VAC20-171-111. Instructor regulatory compliance training requirements.</u></p> <p><u>A. Each eligible person applying to attend a regulatory compliance entry level or in-service training session provided by the department shall file with the department:</u></p> <p><u>1. A properly completed application provided by the department; and</u></p> <p><u>2. The applicable, nonrefundable application fee.</u></p> <p><u>Upon receipt of the training enrollment application the department will assign the applicant to a regulatory compliance training session provided by the department. Applicants for initial certification as an instructor must achieve a minimum passing score of 80% on the entry level regulatory compliance examination.</u></p> <p><u>B. Department entry level regulatory compliance training must be completed within 12 months of approval of application for an initial instructor certification.</u></p>

	<p><u>6VAC20-171-115.</u></p>	<p><u>Initial Detector Canine Handler Examiner Certification.</u></p>	<p>Amend the inserted section in regard to the certification of Detector Canine Handler Examiners pursuant to §9.1-138 et seq. The Department met with members of the Detector Canine industry to establish the qualifications and processes necessary to ensure competency of certified examiners.</p> <p><u>6VAC20-171-115. Initial detector canine handler examiner certification.</u></p> <p><u>A. Each person applying for certification as a detector canine handler examiner shall meet the following minimum requirements for eligibility:</u></p> <ol style="list-style-type: none"> <u>1. Be a minimum of 18 years of age;</u> <u>2. Have a high school diploma or equivalent (GED);</u> <u>3. Have a minimum of five years experience as a detector canine handler and a minimum of two years experience as a detector canine trainer within the previous 10 years prior to application with the Department;</u> <u>4. Have an active certification as a detector canine handler examiner or equivalent credential from a department approved national organization, unit of the United States military, or other formal entity; or be sponsored by a certified DCJS private security services detector canine handler examiner; and</u> <u>5. Successfully pass a written examination and performance evaluations according to department guidelines; and</u> <u>6. 5. Be a United States citizen or legal resident alien of the United States.</u> <p><u>B. Each person applying for certification as a detector canine handler examiner shall file with the department:</u></p> <ol style="list-style-type: none"> <u>1. A properly completed application provided by the department;</u> <u>2. Fingerprint card pursuant to 6VAC20-171-30;</u> <u>3. Official documentation according to subdivisions A 3 and 4 of this section; and</u> <u>4. The applicable, nonrefundable application fee.</u> <p><u>C. Following review of all application requirements, the department shall verify eligibility and authorize the applicant to submit a regulatory compliance training enrollment application pursuant to 6VAC20-171-117 for an entry-level classroom training session provided by the department, or approve the applicant for taking the approved online training session pursuant to 6VAC20-171-117, at which the applicant must</u></p>
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			<p>successfully complete the applicable entry level regulatory compliance training requirements pursuant to this chapter and achieve a passing score of 80% on the examination.</p> <p>D.C. Upon completion of the initial detector canine handler examiner application requirements, the department may issue an initial certification for a period not to exceed 24 months.</p> <p>E. D.The department may issue a letter of temporary certification to detector canine handler examiners for not more than 120 days while awaiting the results of the state and national fingerprint search provided the applicant has met the necessary conditions and requirements.</p> <p>F. E. Each certification shall be issued to the individual named on the application and shall be valid only for use by that individual. No certification shall be assigned or otherwise transferred to another individual.</p> <p>G. F. Each detector canine handler examiner shall comply with all applicable administrative requirements and standards of conduct and shall not engage in any acts prohibited by applicable sections of the Code of Virginia and this chapter.</p>
-	<p><u>6VAC20-171-116.</u></p>	<p><u>Renewal Detector Canine Handler Examiner Certification</u></p>	<p>Amend the inserted section in regard to the renewal certification of Detector Canine Handler Examiners pursuant to §9.1-138 et seq. The Department met with members of the Detector Canine industry to establish the qualifications and processes necessary to ensure the continued competency of certified examiners.</p> <p><u>6VAC20-171-116. Renewal detector canine handler examiner certification.</u></p> <p><u>A. Applications for certification renewal should be received by the department at least 30 days prior to expiration. The department will provide a renewal notification to the last known mailing address of the certified examiner. However, if a renewal notification is not received by the examiner, it is the responsibility of the examiner to ensure renewal requirements are filed with the department. Certification renewal applications received by the department after the expiration date shall be subject to all applicable, nonrefundable renewal fees plus reinstatement fees.</u></p> <p><u>B. Each person applying for examiner certification renewal shall meet the minimum requirements for eligibility as follows:</u></p> <ol style="list-style-type: none"> <u>1. Have maintained certification as a detector</u>

			<p><u>canine handler examiner or equivalent credential according to 6VAC20-171-115 A 4 and demonstrate the completion of a minimum of 16 hours of continuing education during the previous certification period; and</u></p> <p>2. Successfully complete the in-service regulatory compliance classroom or online training session provided by the department within the 12 months immediately preceding the expiration date of the current certification; and</p> <p>3. 2. Be in good standing in every jurisdiction where licensed, registered, or certified in private security services or related field. This subdivision shall not apply to any probationary periods during which the individual is eligible to operate under the license, registration, or certification.</p> <p><u>C. The department may renew a certification for a period not to exceed 24 months.</u></p> <p><u>D. The department may renew a certification when the following are received by the department:</u></p> <p><u>1. A properly completed renewal application provided by the department;</u></p> <p><u>2. The applicable, nonrefundable certification renewal fee; and</u></p> <p><u>3. Official documentation according to subsection B.</u></p> <p><u>E. Any examiner renewal application received by the department shall meet all renewal requirements prior to the expiration date of a certification or shall be subject to the requirements set forth by the reinstatement provisions of this chapter.</u></p>
	<p><u>6VAC20-171-117.</u></p>	<p><u>Detector Canine Handler Examiner Regulatory Compliance Training Enrollment</u></p>	<p>Delete the entire inserted section.</p> <p><u>6VAC20-171-117. Detector canine handler examiner regulatory compliance training enrollment.</u></p> <p><u>A. Each eligible person applying to attend a regulatory compliance entry level or in-service training session provided by the department shall file with the department:</u></p> <p><u>1. A properly completed application provided by the department; and</u></p> <p><u>2. The applicable, nonrefundable application fee.</u></p> <p><u>Upon receipt of the training enrollment application the department will assign the applicant to a regulatory compliance examiner training session</u></p>

			<p>provided by the department, at which the applicant must successfully complete the applicable training requirements. Applicants for initial certification as an examiner must achieve a minimum passing score of 80% on the entry level examination.</p> <p>B. Department entry level regulatory compliance training must be completed within 12 months of approval of application for an initial examiner certification.</p>
6VAC20-171-120A		Initial registration application.	<p>Amend the language to include new categories of registration pursuant to §9.1-138 et seq. In addition provide a reference to the firearm endorsement requirements outlined in the regulations.</p> <p>A. Individuals required to be registered, pursuant to § 9.1-139 C of the Code of Virginia, in the categories of armored car personnel, courier, unarmed security officer, armed security officer, security canine handler, <u>explosives detector canine handler, narcotics detector canine handler, private investigator, personal protection specialist, alarm respondent, locksmith, central station dispatcher, electronic security sales representative, electronic security technician, or electronic security technician's assistant</u> shall meet all registration requirements in this section. Prior to the issuance of a registration, the applicant shall meet or exceed the requirements of registration and application submittal to the department as set forth in this section. Individuals who carry or have access to a firearm while on duty must have a valid registration with a firearm endorsement <u>pursuant to 6 VAC 20-171-140</u>. If carrying a handgun concealed, the individual must also have a valid concealed handgun permit and the written permission of his employer pursuant to § 18.2-308 of the Code of Virginia.</p>
6VAC20-171-120B2		Initial registration application.	<p>Amend reference to reflect reformatting of the training standards sections.</p> <p>B. 2. Successfully complete all initial training requirements for each registration category <u>requested</u>, including firearms endorsement if applicable, requested pursuant to the compulsory minimum training standards in 6VAC20-171-360<u>6VAC20-171-350</u>; and</p>
6VAC20-171-120B	4	Initial registration application.	<p>Delete the inserted provision. The Department will no longer issue photo identification cards. 4. Have a photo taken by a certified private security</p>

			services training school or other site approved by the department.
6VAC20-171-120C3		Initial registration application.	Amend language to reflect current process. The department scans fingerprint cards thus eliminating the need for two cards. C. 3. Fingerprint cards <u>card</u> pursuant to 6VAC20-171-30; and
6VAC20-171-120C4	4-5	Initial registration application.	Delete the inserted provision. The Department will no longer issue photo identification cards. 4. A photo taken by a certified private security services training school or other site approved by the department; and. Reformat numbering for C5 to C4
6VAC20-171-120D		Initial registration application.	Insert the registration category of locksmith according to §9.1-139 (H) D. Each person seeking or required to seek registration as unarmed security officer, alarm respondent, <u>locksmith</u> , central station dispatcher, electronic security sales representative, electronic security technician, or electronic security technician's assistant may be employed for a period not to exceed 90 consecutive days in any categories listed above while completing the compulsory minimum training standards, provided:
6VAC20-171-120D1		Initial registration application.	Amend language to reflect current process. The department scans fingerprint cards thus eliminating the need for two cards. 1. Fingerprint cards <u>Fingerprints</u> have been submitted pursuant to 6VAC20-171-30;
6VAC20-171-120E		Initial registration application.	Strike language in regard to a registration letter being submitted to DMV. The Department no longer utilizes DMV to issue credentials. E. Upon completion of the initial registration application requirements, the department may issue an initial registration letter for a period not to exceed 24 months. This registration letter shall be submitted by the applicant to the Virginia Department of Motor Vehicles or other specified entity for a state-issued photo identification card.
6VAC20-171-120F.		Initial registration application.	Insert the word valid after the word registration.
6VAC20-171-130A		Renewal registration application.	Insert language to clarify that all renewal requirements must be met prior to submittal of the renewal application and provide the option to send renewals electronically in an attempt to move towards a paperless system.

			<p>A. Applications for registration renewal <u>shall meet all renewal requirements and</u> should be received by the department at least 30 days prior to expiration. The department will provide a renewal notification to the last known mailing address <u>of or email address provided by the registered individual.</u> However, if a renewal notification is not received by the individual, it is the responsibility of the individual to ensure renewal requirements are filed with the department. Registration renewal applications received by the department after the expiration date shall be subject to all applicable, nonrefundable renewal fees plus reinstatement fees.</p>
6VAC20-171-130B	3	Renewal registration application.	<p>Delete the inserted language, the department will no longer be issuing photo identification cards. 3. Upon the request of the department, have a new digital photo taken by a certified private security services training school or other site approved by the department.</p>
6VAC20-171-130C2		Renewal registration application.	<p>Amend language to reflect the need for one card. The department instituted a scanning process that eliminates the need for duplicate cards. C. 2. For individuals applying for renewal with the category of armored car personnel, fingerprint cards <u>card</u> submitted pursuant to 6VAC20-171-30;</p>
6VAC20-171-130C3		Renewal registration application.	<p>Amend for grammatical purpose 3. The applicable, nonrefundable registration renewal fee; and</p>
6VAC20-171-130C4		Renewal registration application.	<p>Amend reference to reflect changes in the firearms section of the regulations. 4. For individuals with firearms endorsements, evidence of completion of annual firearms retraining in accordance with 6VAC20-171-400. <u>Part V, Article 2 of this chapter.</u></p>
6VAC20-171-130C5	5	Renewal registration application.	<p>Delete the inserted language, the department will no longer be issuing photo identification cards. 5. Upon the request of the department, a new photo taken by a certified private security services training school or other site approved by the department.</p>
6VAC20-171-130D		Renewal registration application.	<p>Strike requirements in regard to submitting a letter to DMV. The department no longer utilizes DMV to issue credentials. D. Upon completion of the renewal registration application requirements, the department may issue a registration letter for a period not to exceed 24 months. This registration letter shall be submitted by the applicant to the Virginia</p>

			Department of Motor Vehicles or other specified entity for a state-issued photo-identification card.
6VAC20-171-130E.		Renewal registration application.	Insert reference to reinstatement provisions. E. Any renewal application received by the department shall meet all renewal requirements prior to the expiration date of a registration or shall be subject to the requirements set forth by the reinstatement provisions pursuant to <u>6 VAC 20-171-180.</u>
	6VAC20-171-135	Firearms Endorsement	Insert section specific to firearms endorsements. The requirements have not changed but adding a specific section provides clear and concise information to the applicant on the requirements and the application and training processes formally spread throughout the regulations. <u>6VAC20-171-135. Firearms endorsement.</u> A. <u>A firearms endorsement is required for all private security services business personnel who carry or have access to a firearm while on duty. Each person who carries or has access to firearms while on duty shall qualify with each type of action and caliber of firearm to which he has access.</u> B. <u>Each person applying for a firearms endorsement shall meet the minimum requirements for eligibility as follows:</u> 1. <u>Must be registered in a regulated category.</u> 2. <u>Must complete entry-level handgun, and if applicable, shotgun and patrol rifle training as described in Part V, Article 2 (6VAC20-171-365 et seq.) of this chapter.</u> C. <u>All armed private security services business personnel with the exception of personal protection specialist must satisfactorily complete firearms retraining prescribed in 6VAC20-171-400.</u> D. <u>All armed personal protection specialist must satisfactorily complete firearms retraining prescribed in 6VAC20-171-420.</u> E. <u>Firearms endorsements are issued for a period not to exceed 12 months. Individuals must complete firearms retraining within the 90 days prior to the expiration of their current firearm endorsement or will be required to complete entry-level training requirements prior to applying for an active endorsement.</u>
6VAC20-171-160C		Additional category application	Delete the words or certification based on the new instructor category fee requirements of 6VAC20-171-100.
6VAC20-171-170.		Replacement state issued	Amend title and the first sentence by striking the words “photo identification” and “letter” and

		photo identification letter.	inserting <u>registration or certification card</u> to reflect proper language. The Department no longer issues a letter but issues the actual registration card. Delete all references to photo identification and replace with registration or certification Registered or certified individuals seeking a replacement state issued photo identification letter <u>registration or certification card</u> shall submit to the department:
6VAC20-171-180A		Reinstatement	Amend first sentence of paragraph to include specific certification categories according to §9.1-138. A. Any business license, training school, <u>instructor, compliance agent, detector canine handler examiner</u> certification, instructor certification or registration not renewed on or before the expiration date shall become null and void. Pursuant to the Code of Virginia, all such persons must currently be licensed, registered or certified with the department to provide private security services.
6VAC20-171-180B		Reinstatement	Insert the word certification in the section, this language was inadvertently left out. In addition the language in regard to the prohibition of reinstating a license or school has been stricken . Requiring an entity to resubmit for an initial credential causes an undue hardship and the department will handle lapses in insurance through disciplinary measures. B. A renewal application must be received by the department within 60 days following the expiration date of the license, <u>certification</u> or registration in order to be reinstated by the department providing all renewal requirements have been met. The department shall not reinstate renewal applications received after the 60-day reinstatement period has expired. It is unlawful to operate without a valid registration, <u>certification</u> , or license including during reinstatement period. The department shall not reinstate business licenses or training school certifications that have become null and void due to not maintaining required insurance or surety bond coverage.
6VAC20-171-180	E	Reinstatement	Insert new provision that reflects the current procedures utilized when reinstating a credential. The department receives numerous inquiries in regard to the process and adding this provision will clarify the process <u>E. When a license, certification or registration is reinstated, the applicant shall continue to have the same DCJS number and shall be assigned an expiration date two years from the previous</u>

			<u>expiration date of the license, certification or registration.</u>
6VAC20-171-180	F-I	Reinstatement	<p>Insert provisions in regard to the period of reinstatement. Under the current regulations the applicant must cease and desist all operations which may cause undue hardship on a business/school or individual. In addition, the department did not have authority over the applicant should they either have continued to provide regulated services and were in noncompliance of the Code and Regulations. These provisions fully supported by the department were recommended by members of the industry.</p> <p><u>F. An applicant who reinstates shall be regarded as having been continuously licensed, certified or registered without interruption. Therefore the applicant shall remain under the disciplinary authority of the department during this entire period and may be held accountable for his activities during this period.</u></p> <p><u>G. A person who fails to reinstate his license, certification or registration shall be regarded as unlicensed, uncertified or unregistered from the expiration date of the license, certification or registration forward.</u></p> <p><u>H. Nothing in this chapter shall divest the department of its authority to discipline a person for a violation of the law or regulations during the period of time for which the person was licensed, certified or registered.</u></p> <p><u>I. Firearms endorsements are not eligible for reinstatement. If renewal requirements are not met pursuant to 6VAC20-171-135, the applicant shall meet all initial application requirements, including applicable initial firearms training requirements.</u></p>
6VAC20-171-190A4		Renewal extension	<p>Insert a specific description of an emergency temporary assignment. This recommendation is was submitted by members of the industry and supported by the Department to ensure clarification of what the department will issue an extension for.</p> <p>A. 4. Any emergency temporary assignment of private security personnel <u>for purposes of (i) natural disaster, (ii) homeland security or (iii) documented threat,</u> by the private security services business or training school for which he is employed.</p>
6VAC20-171-190B1		Renewal extension	<p>Insert a provision at the end of the paragraph that allows for the department to waive this requirement based on justifiable circumstances.</p> <p>B. 1. Be submitted in writing, dated and signed by</p>

			the individual or principal of a licensed entity prior to the expiration date of the time limit required for completion of the requirements. <u>This requirement may be waived by the department based on an evaluation of the justification for waiver.</u>
6VAC20-171-190B3		Renewal extension	Insert language for consistency with 190A4. 3. Include a copy of the physician's record of the injury or illness, or a copy of the government orders or documentation of emergency temporary assignment.
6VAC20-171-190C		Renewal extension	Strike this provision based on the inclusion of allowing the department to waive the restrictions of an extension under B1. C. No extension will be approved for registrations, certifications, or business licenses that have expired.
6VAC20-171-190D		Renewal extension	Reformat outline D. Applications for additional extensions may be approved upon written request of the person, business, or training school.
6VAC20-171-190	D	Renewal extension	Insert provision that specifies the current policy utilized by the Department. Providing more than a 12 month extension could result in an individual having more then 3 years of time with out continuing education. <u>D. The total time for renewal extension, including additional extensions, shall not exceed 12 months beyond the original expiration date. If renewal requirements are not met during the period of extension, the individual must complete all initial training requirements to include applicable entry-level training.</u>
6VAC20-171-190E.		Renewal extension	Amend to allow for an emergency exemption pursuant to 9.1-139. E. The private security services person, business, or training school shall be nonoperational during the period of extension <u>unless otherwise issued a temporary exemption has been authorized by the department pursuant to §9.1-139 of the Code of Virginia.</u>
6VAC20-171-200B.		Denial, probation, suspension and revocation.	Insert language. The requirement was too broad, the department added the language “in a private security services or related field”, which reflected the industries under the Board’s purview B. The department may deny a license, registration or certification in which any person or principal of an applying business or training school has not

			maintained good standing in every jurisdiction where licensed, registered or certified <u>in a private security services or related field</u> ; or has had his license, registration or certification denied upon initial application, suspended, revoked, surrendered, or not renewed; or has otherwise been disciplined in connection with a disciplinary action prior to applying for licensing, registration or certification in Virginia.
6VAC20-171-200D		Denial, probation, suspension and revocation.	Amend language to include all credentials under the authority of the Department and Board. D. The department may deny licensure to a firm, <u>certification or registration</u> for other just cause.
6VAC20-171-200E		Denial, probation, suspension and revocation.	Insert detector canine handler examiner certification in accordance with §9.1-138. E. A licensee, training school, compliance agent, instructor, <u>detector canine handler examiner</u> , or registered individual shall be subject to disciplinary action for violations or noncompliance with the Code of Virginia or this chapter. Disciplinary action shall be in accordance with procedures prescribed by the Administrative Process Act. The disciplinary action may include but is not limited to a letter of censure, fine, probation, suspension or revocation.
6VAC20-171-200	F	Denial, probation, suspension and revocation.	Insert a provision to contact the employer if a regulated individual is subject to disciplinary action. This was recommended by the industry and the department supports this provision. <u>F. If a registrant or certified person is subject to disciplinary action for violations or noncompliance with the Code of Virginia or this chapter, the department will notify the last known licensed or certified private security services business or training school by which they were employed or affiliated.</u>
6VAC20-171-215.		General requirements.	Insert all regulated entities in this sentence and remove all further references in articles within this part of the chapter. All private security <u>services registered and certified personnel, licensed businesses and certified training schools</u> are required to maintain administrative requirements and standards of conduct as determined by the Code of Virginia, department guidelines and this chapter.
6VAC20-171-220.1		Business administrative requirements.	Insert the requirement that schools provide an email address to the department. This is an attempt to move towards a paperless system and reinsert the language to maintain a physical address for records and insert a requirement to list

			<p>all addresses of business.</p> <p>1. Maintain at all times with the department its physical location in Virginia where records required to be maintained by the Code of Virginia and this chapter are kept and available for inspection by the department address in Virginia where records required to be maintained by the Code of Virginia and this chapter are kept and available for inspection by the department, the physical address of all locations in Virginia utilized by the licensee in which regulated services are offered and email address if applicable. A post office box is not a physical location address. Such notification Notification of any change shall be in writing and received by the department no later than 10 days after the effective date of the change.</p>
6VAC20-171-220.2		Business administrative requirements.	<p>Insert language to include fictitious names. It is a requirement that a business file fictitious names with the department and this language was inadvertently left out of administrative requirements.</p> <p>2. Maintain at all times with the department its current operating name and all fictitious names.</p>
6VAC20-171-220.5		Business administrative requirements.	<p>Amend provision to reflect changes made in the section addressing reinstatement under 6VAC20-181B. Requiring an entity to resubmit for an initial credential causes an undue hardship and the department will handle lapses in insurance through disciplinary measures.</p> <p>5. Maintain at all times current liability coverage at least in the minimum amounts prescribed by the application requirements of this chapter. Failure of the business to do so shall result in the license becoming null and void. Each day of uninsured activity would be construed as an individual violation of this requirement.</p>
6VAC20-171-220.7		Business administrative requirements.	<p>Amend sentence to delete requirement that a compliance agent cannot be designated for more than one licensee. 7. Employ at all times at least one individual designated as compliance agent who is in good standing and is certified pursuant to 6VAC20-171-70 and who is not currently designated as compliance agent for another licensee. In the event there is more than one compliance agent designated for the business, designate one as the primary compliance agent and point of contact.</p>
6VAC20-171-220.8		Business administrative	<p>Insert or electronic images in order to stay abreast of evolving technology and initiatives to create a</p>

		requirements.	<p>paperless process.</p> <p>8. Maintain at all times and for a period of not less than three years from the date of termination of employment the following documentation concerning all regulants: <u>documentation or electronic images</u> of the date of hire in the regulated category, documentation that the fingerprint processing application was submitted on the date of hire, verification that the employee is a U.S. citizen or legal resident alien and is properly registered/certified and trained, current physical and mailing addresses for all regulated employees and telephone numbers if applicable.</p>
6VAC20-171-220.9		Business administrative requirements.	<p>Insert a sentence requiring the business to provide a notification of the individual who will be responsible for the company and regulated employees compliance during the interim period.</p> <p>9. Upon termination of employment of a certified compliance agent, notify the department in writing within 10 calendar days. <u>This notification shall include the name of the individual responsible for the licensee's adherence to applicable administrative requirements and standards of conduct during the period of replacement.</u></p>
6VAC20-171-220.10		Business administrative requirements.	<p>Amend the paragraph : strike in the first sentence after the word chapter and who is not currently designated for another licensee. In the last sentence, strike the word Such and insert the word <u>This</u>.</p>
6VAC20-171-220.13		Business administrative requirements.	<p>Insert language to limit the reporting of convictions to those that could result in the ineligibility of a licensure/registration or certification pursuant to the Code.</p> <p>13. Inform the department in writing within 10 days of receiving knowledge of any principal, partner, officer, compliance agent or employee regulated or required to be regulated by this chapter pleading guilty or nolo contendere or being convicted or found guilty of any felony or of a misdemeanor <u>as outlined in §9.1-139 (K) of the Code of Virginia.</u></p>
6VAC20-171-220.14		Business administrative requirements.	<p>Strike the language there being no appeal therefrom or the time for appeal having elapsed from the end of the sentence.</p>
6VAC20-171-220.15		Business administrative requirements.	<p>Amend for grammatical correction</p> <p>15. On a form provided by the department and within 10 calendar days of receiving knowledge of the an incident, submit a report of any incident in which any registrant has discharged a firearm while</p>

			on duty, excluding any training exercise.
6VAC20-171-220.18		Business administrative requirements.	<p>Insert language to include the transferring of monitoring services to ensure that all circumstances are addressed.</p> <p>18. In the event a licensee sells or otherwise transfers the ownership of a monitoring agreement of an electronic security customer in <u>Virginia</u>, notify the end user, in writing, within 30 days of the transfer of monitoring services. No licensee shall <u>sell or otherwise transfer</u> to an entity not licensed in Virginia.</p>
6VAC20-171-220.19		Business administrative requirements.	<p>Amend the language to reflect the current process in place</p> <p>19. Ensure that all regulated employees carry a state the department issued photo identification registration card along with their registration or certification card, unless the card is one in the same or temporary registration letter along with a <u>photo ID while on duty.</u></p>
6VAC20-171-220.	20	Business administrative requirements.	<p>Insert provision for businesses to require employees who provide regulated services for up to 120 days while completing training and obtaining their registrations to carry a photo id and department documentation.</p> <p><u>20. Ensure that all regulated employees authorized to provide private security services while completing compulsory minimum training standards pursuant to §9.1-139 (H) of the Code of Virginia carry a photo ID along with an authorization form provided by the Department while on duty.</u></p>
6VAC20-171-220.	21	Business administrative requirements.	<p>Insert provision for written use of force policies. Many businesses were not maintaining a use of force policy and investigative records reflect numerous situations of negligence use of firearms and reports of injury to citizens. This provision will provide documentation as well as ensure verification that a business is aware of which employees utilize firearms or intermediate weapons and set individual business standards.</p> <p><u>21. Maintain a written use of force policy dictating the business' policy for using deadly force and for use of less lethal force. A statement certifying that the employee has read and understands the</u></p>

			<u>business' use of force policy must be signed by each employee who is permitted to carry firearms or intermediate weapons and maintained in the employee's file.</u>
6VAC20-171-220.	22	Business administrative requirements.	<p>Insert provision to ensure that the business is aware of the regulated individuals utilizing intermediate weapons have completed proper training. This information is not maintained by the Department and must be maintained by the individual businesses for the purpose of public safety.</p> <p><u>22. Maintain records for individual employees permitted to carry intermediate weapons while on duty to verify training in the use of the permitted intermediate weapons.</u></p>
6VAC20-171-220.	23	Business administrative requirements.	<p>Insert provision in accordance with setting business administrative requirements pursuant to the Code §9.1-138 et seq. in regard to businesses that provide detector canine services.</p> <p><u>23. Maintain at all times and for a period of not less than three years from the date of termination, decertification or other separation, records of detector canine handler team certifications to include a photo of detector canine teams utilized to provide regulated private security services as defined in this chapter.</u></p>
6VAC20-171-230.4b		Business standards of conduct.	<p>Amend subsection to include proper terminology for armed alarm respondents and to include detector canine handlers pursuant to the Code §9.1-139.</p> <p>4.b. A licensee shall not allow individuals requiring registration as armored car personnel, armed security officers/couriers, <u>armed alarm</u> respondents with firearm endorsement, private investigators, personal protection specialists, <u>detector canine handlers</u> or security canine handlers to perform private security services until such time as the individual has been issued a registration by the department;</p>
6VAC20-171-230.4c		Business standards of conduct.	<p>Amend subsection to include proper terminology for unarmed alarm respondents and armored car driver and to include locksmiths and remove armored car drivers pursuant to the Code §9.1-139(H)</p> <p>c. A licensee may employ individuals requiring registration as <u>unarmed alarm</u> respondent without</p>

			<p>firearm endorsement, locksmith, central station dispatcher, electronic security sales representative, electronic security technician, unarmed armored car driver, unarmed security officer or electronic security technician's assistant for a period not to exceed 90 consecutive days in any registered category listed above while completing the compulsory minimum training standards provided:</p> <p>(1) delete cards have and insert <u>card has</u></p>
6VAC20-171-230.7		Business standards of conduct.	<p>Insert <u>electronic images</u> in order to stay abreast of evolving technology and initiatives to create a paperless process.</p> <p>7. Permit the department during regular business hours to inspect, review, or copy those documents, <u>electronic images, business records or training records</u> that are required to be maintained by the Code of Virginia and this chapter.</p>
6VAC20-171-230.10		Business standards of conduct.	<p>Delete the inserted proposed language ensure that regulated employees of the business have not and strike the language from which no appeal is pending, the time for appeal having elapsed from the paragraph.</p>
6VAC20-171-230.11		Business standards of conduct.	<p>Amend language to restrict individuals from assisting others in receiving a credential through fraud or misrepresentation.</p> <p>11. Not obtain <u>or aid and abet others to obtain a license, license renewal, registration, registration renewal, certification, certification renewal, or firearms endorsement through any fraud or misrepresentation.</u></p>
6VAC20-171-230.12		Business standards of conduct.	<p>Amend language to provide specific clarity for businesses that contract with other businesses in providing private security services.</p> <p>12. Include the business license number issued by the department on all business advertising materials pursuant to the Code of Virginia. <u>Business advertising materials containing information regarding more than one licensee must contain the business license numbers of each licensee identified.</u></p>
6VAC20-171-230.18		Business standards of conduct.	<p>Amend language to provide specificity of what is authorized by the Code.</p> <p>18. Utilize vehicles for private security services using or displaying a-an <u>amber flashing light</u> only as specifically authorized by § 46.2-1025.9 of the Code of Virginia.</p>

6VAC20-171-230.19		Business standards of conduct.	<p>Insert <u>of the Commonwealth</u> to provide clarity.</p> <p>19. Not use or display the state seal of Virginia or the seal of the Department of Criminal Justice Services, or any portion thereof, or the seal of any political subdivision <u>of the Commonwealth</u>, or any portion thereof, as a part of any logo, stationery, letter, training document, business card, badge, patch, insignia or other form of identification or advertisement.</p>
6VAC20-171-230.25		Business standards of conduct.	<p>Insert the requirement that binding arbitrations are also satisfied in order to protect the general public utilizing private security services</p> <p>25. Satisfy all judgments <u>to include binding arbitrations</u> related to private security services not provided.</p>
6VAC20-171-230.26		Business standards of conduct.	<p>Strike language that limits the type of material that is prohibited to be published.</p> <p>26. Not publish or cause to be published any written business material relating to private security services that contains an assertion, representation, or statement of fact that is false, deceptive or misleading.</p>
6VAC20-171-230.27		Business standards of conduct.	<p>Insert <u>or otherwise prohibited under federal law.</u> Current verbiage implies that use of "pretext" is otherwise legal, when it can be illegal under certain circumstances, and specifically under several federal laws.</p> <p>27. Not conduct private security business under a fictitious or assumed name unless the name is on file with the Department of Criminal Justice Services. This does not apply to a private investigator conducting a "pretext," provided that the private investigator does not state that he is representing a private security business that does not exist <u>or otherwise prohibited under federal law.</u></p>
6VAC20-171-230.	28	Business standards of conduct.	<p>Insert provision to prevent undisclosed persons who may not have submitted for a criminal history check or are otherwise ineligible to provide private security services.</p> <p>28. Not act as or be an ostensible licensee for <u>undisclosed persons who do or will control directly or indirectly the operations of the licensee's business.</u></p>
6VAC20-171-230.	29	Business standards of	<p>Insert provision to reduce the impediment of active investigations for noncompliance or violations of</p>

		conduct.	the Code and Regulations. <u>29. Not provide false or misleading information to representatives of the department.</u>
6VAC20-171-230.	30	Business standards of conduct.	Delete the proposed requirement 30. Not refuse to cooperate with an investigation being conducted by the department and Insert provisions to reduce the impediment of active investigations for noncompliance or violations of the Code and Regulations. <u>30. Not provide materially incorrect, misleading, incomplete or untrue information on any email, application, or any other document filed with the department.</u>
6VAC20-171-240.2		Compliance agent <u>administrative requirements and standards of conduct</u>	Insert the requirement that compliance agents provide an email address to the department. This is an attempt to move towards a paperless system. 2. Maintain at all times with the department his mailing address and email address if applicable. Written notification of any change of address shall be in writing and received by the department no later than 10 days after the effective date of the change.
6VAC20-171-240.5		Compliance agent <u>administrative requirements and standards of conduct</u>	Strike the language from which no appeal is pending, the time for appeal having elapsed.
6VAC20-171-240.6		Compliance agent <u>administrative requirements and standards of conduct</u>	Insert language to limit the reporting of convictions to those that could result in the ineligibility of a licensure/registration or certification pursuant to the Code. 6. Inform the department, and the licensee for which the individual is designated as compliance agent if applicable, in writing within 10 days after pleading guilty or nolo contendere or being convicted or found guilty of any felony or of a misdemeanor <u>as outlined in §9.1-139 (K) of the Code of Virginia.</u>
6VAC20-171-240.7		Compliance agent <u>administrative requirements and standards of conduct</u>	Strike the language there being no appeal therefrom or the for appeal having elapsed.
6VAC20-171-240.9		Compliance agent	Strike the entire sentence 9. Only be designated with the department and acting as a compliance

		<u>administrative requirements and standards of conduct</u>	agent for one licensed entity.
6VAC20-171-240.10d		Compliance agent administrative requirements and standards of conduct	<p>Strike the language “or certification”. This language is obsolete in regard to a photo id card and add temporary registration information and renumber.</p> <p>40. 9. d. Ensure that all regulated employees carry a state the department issued photo identification registration card unless the card is one in the same along with their registration or certification card. or temporary registration letter along with a photo ID while on duty.</p>
6VAC20-171-240.10	9e	Compliance agent administrative requirements and standards of conduct	<p>Insert the language for individuals who provide private security services prior to obtaining a valid registration and renumber section.</p> <p>40. 9. e. Ensure that all regulated employees authorized to provide private security services while completing compulsory minimum training standards pursuant to §9.1-139 (H) of the code of Virginia carry a photo ID along with an authorization form provided by the Department while on duty.</p> <p>Reformat numbers 11- 21 to read 10-20</p>
6VAC20-171-240.14		Compliance agent administrative requirements and standards of conduct	<p>Insert the requirement that binding arbitrations are also satisfied in order to protect the general public utilizing private security services. Renumber</p> <p>44. 13. Satisfy all judgments to include binding arbitrations related to private security services not provided.</p>
6VAC20-171-240.15		Compliance agent administrative requirements and standards of conduct	<p>Strike language that limits the type of material that is prohibited to be published. Renumber</p> <p>45. 14. Not publish or cause to be published any written business material relating to private security services that contain an assertion, representation, or statement of fact that is false, deceptive or misleading.</p>
6VAC20-171-240.16		Compliance agent <u>administrative requirements and standards of conduct</u>	<p>Insert <u>or otherwise prohibited under federal law.</u> Current verbiage implies that use of “pretext” is otherwise legal, when it can be illegal under certain circumstances, and specifically under several federal laws. Renumber</p> <p>46. 15. Not conduct private security business under</p>

			a fictitious or assumed name unless the name is on file with the Department of Criminal Justice Services. This does not apply to a private investigator conducting a "pretext," provided that the private investigator does not state that he is representing a private security business that does not exist <u>or otherwise prohibited under federal law.</u>
6VAC20-171-240.	16	Compliance agent administrative requirements and standards of conduct	Insert provision, this standard of conduct is required of all other regulated persons and was inadvertently left out for compliance agents. Renumber <u>17</u> 16. Not violate any state or local ordinances related to private security services.
6VAC20-171-240.	17	Compliance agent administrative requirements and standards of conduct	Insert provisions to reduce the impediment of active investigations for noncompliance or violations of the Code and Regulations. Renumber <u>18</u> .17. Not provide false or misleading information to representatives of the department.
6VAC20-171-240.	18-19	Compliance agent <u>administrative requirements and standards of conduct</u>	Insert provisions for purposes of security of information, compliance agents have enhanced access to the department's licensing system that enables them to view information on the business employees. Renumber <u>19</u> . 18. Not use access to the department's database information for any other purpose than verifying employee's application status. <u>20</u> . 19. Not allow another to use access granted to the department's database for any purpose.
6VAC20-171-240.	20	Compliance agent <u>administrative requirements and standards of conduct</u>	Insert provision to reduce the impediment of active investigations for noncompliance or violations of the Code and Regulations. Renumber <u>24</u> . 20. Not provide materially incorrect, misleading, incomplete or untrue information on any email, application or any other document filed with the department.
6VAC20-171-245.		General Requirements	Repeal Section – addressed all general requirements under 6VAC20-171-215 All training schools are required to maintain administrative requirements and standards of conduct as determined by the Code of Virginia, department guidelines and this chapter.

<p>6VAC20-171-250.1</p>		<p><u>Training school administrative requirements.</u></p>	<p>Insert the requirement that schools provide an email address to the department. This is an attempt to move towards a paperless system. 1. Maintain at all times with the department its physical location in Virginia where records required to be maintained by the Code of Virginia and this chapter are kept and available for inspection by the department. address and email address if applicable. A post office box is not a physical location address. Such notification Notification of any change shall be in writing and received by the department no later than 10 days after the effective date of the change.</p>
<p>6VAC20-171-250.2</p>		<p>Training school administrative requirements</p>	<p>Insert the word school after the word training Assistant training school director..</p>
<p>6VAC20-171-250.7</p>		<p>Training school administrative requirements.</p>	<p>Amend provision to reflect changes made in the section addressing reinstatement under 6VAC20-181B. Requiring an entity to resubmit for an initial credential causes an undue hardship and the department will handle lapses in insurance through disciplinary measures. 7. Maintain at all times current liability coverage at least in the minimum amounts prescribed by the application requirements of this chapter. Failure of the training school to do so shall result in the certification training school becoming null and void. Each day of uninsured activity would be construed as an individual violation of this requirement.</p>
<p>6VAC20-171-250.8</p>		<p>Training school administrative requirements.</p>	<p>Insert language to limit the reporting of convictions to those that could result in the ineligibility of a licensure/registration or certification pursuant to the Code. 8. Inform the department in writing within 10 days, for any principal, partner, officer, instructor or employee regulated or required to be regulated by this chapter pleading guilty or nolo contendere or being convicted or found guilty of any felony or of a misdemeanor as outlined in §9.1-139 (K) of the Code of Virginia.</p>
<p>6VAC20-171-250.9</p>		<p>Training school administrative requirements.</p>	<p>Strike the language, there being no appeal therefrom or the time for appeal having elapsed.</p>
<p>6VAC20-171-250.11</p>		<p>Training school administrative requirements.</p>	<p>Insert language to include fictitious names. It is a requirement that a school file fictitious names with the department and this language was inadvertently left out of administrative requirements. 11. Maintain at all times with the department its</p>

			current operating name <u>and fictitious names</u> . Any name change reports shall be submitted in writing within 10 days after the occurrence of such change and accompanied by certified true copies of the documents that establish the name change.
6VAC20-171-250.21		Training school administrative requirements.	Amend for clarity and grammatical purpose 21. On a form provided by the department and within 10 calendar days of the <u>an</u> incident, submit a report of any incident in which any instructor, student or employee has discharged a firearm while on duty, excluding any training exercise.
6VAC20-171-250.	23	Training school administrative requirements.	Insert provision to ensure that a business does not continue to utilize a person not qualified to carry a firearm and also allows for the Department to follow up to ensure compliance. <u>23. Inform the department and compliance agent of the employing business if applicable, in a format prescribed by the department within seven days of any person regulated under this chapter who fails to requalify with a minimum passing score on the range.</u>
6VAC20-171-260.5		Training school standards of conduct.	Insert <u>electronic images</u> in order to stay abreast of evolving technology and initiatives to create a paperless process. 5. Permit the department during regular business hours to inspect, review, or copy those documents, <u>electronic images, business records</u> or training records that are required to be maintained by the Code of Virginia and this chapter.
6VAC20-171-260.10		Training school administrative requirements.	Strike the language, from which no appeal is pending, the time for appeal having elapsed.
6VAC20-171-260.11		Training school standards of conduct.	Amend language to restrict schools from assisting others in receiving a credential through fraud or misrepresentation. 11. Not obtain <u>or aid and abet others to obtain</u> a license, license renewal, registration, registration renewal, certification or certification renewal through any fraud or misrepresentation.
6VAC20-171-260.12		Training school standards of conduct.	Amend the word entry-level and Insert language <u>unless otherwise authorized by the department to allow for a combination of entry-level training and in-service training under certain circumstances.</u>
6VAC20-171-260.18		Training school standards of	Insert <u>of the Commonwealth</u> after the word subdivision.

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

		administrative requirements and standards of conduct	8. Not violate any state or local ordinances <u>relating to private security services.</u>
6VAC20-171-270.9		Training school director administrative requirements and standards of conduct	Insert the requirement that binding arbitrations are also satisfied in order to protect the general public utilizing private security services 9. Satisfy all judgments <u>to include binding arbitrations</u> relating to private security services not provided.
6VAC20-171-270.10		Training school director administrative requirements and standards of conduct	Strike language that limits the type of material that is prohibited to be published. 10. Not publish or cause to be published any written business material relating to private security services that contains an assertion, representation, or statement of fact that is false, deceptive or misleading.
6VAC20-171-270.	11-12	Training school director administrative requirements and standards of conduct	Insert provisions for purposes of security of information, training school directors have enhanced access to the department's licensing system that enables them to view information on the trainees as well as submit authorized records to the department. <u>11. Use access to the department's database information only for the purpose of verifying employed instructors' or students' application status.</u> <u>12. Not allow another to use access granted to the department's database for any purpose.</u>
6VAC20-171-270.	13	Training school director administrative requirements and standards of conduct	Insert provision to ensure that a business does not continue to utilize a person not qualified to carry a firearm and also allows for the Department to follow up to ensure compliance. <u>13. Inform the department and compliance agent of the employing business if applicable, in a format prescribed by the department within seven days of any person regulated under this chapter who fails to requalify with a minimum passing score on the range.</u>
6VAC20-171-280.2		Private security services instructor administrative requirements	Insert the requirement that instructors provide an email address to the department. This is an attempt to move towards a paperless system. 2. Maintain at all times with the department his mailing address <u>and email address if applicable.</u>

		and standards of conduct.	Written notification of any address change shall be in writing and received by the department no later than 10 days after the effective date of the change.
6VAC20-171-280.3		Private security services instructor administrative requirements and standards of conduct.	Strike the language, from which no appeal is pending, the time for appeal having elapsed.
6VAC20-171-280.4		Private security services instructor administrative requirements and standards of conduct.	Insert language to limit the reporting of convictions to those that could result in the ineligibility of a licensure/registration or certification pursuant to the Code. 4. Inform the department, and the training school for which the individual is designated as an instructor if applicable, in writing within 10 days after pleading guilty or nolo contendere or being convicted or found guilty of any felony or of a misdemeanor as outlined in §9.1-139 (K) of the <u>Code of Virginia</u> .
6VAC20-171-280.5		Private security services instructor administrative requirements and standards of conduct.	Strike the language, there being no appeal therefrom or the time for appeal having elapsed.
6VAC20-171-280.14		Private security services instructor administrative requirements and standards of conduct.	Amend to specify what is in the Department's purview. 14. Not violate any state or local ordinances <u>relating to private security services</u> .
6VAC20-171-280.15		Private security services instructor administrative requirements and standards of conduct.	Insert provision that instructors obtain continuing education in their area of certification once every two years or certification period. <u>15. Maintain documentation of successful completion of a minimum of 2 hours of professional development for topics related to each category of instructor certification as established in 6VAC20-171-100 B.6 during each certification period; or successful completion of compulsory in-service training by another private security services certified instructor if also registered in the same categories.</u>
6VAC20-171-280.	16	Private	Insert provision to be consistent with other

		security services instructor administrative requirements and standards of conduct.	regulated individuals standards of conduct. <u>16. Not publish or cause to be published any material relating to Private Security Services which contain an assertion, representation, or statement of fact that is false, deceptive or misleading.</u>
6VAC20-171-280.	17-18	Private security services instructor administrative requirements and standards of conduct.	Insert provision to reduce the impediment of active investigations for noncompliance or violations of the Code and Regulations. <u>17. Not provide false or misleading or misleading information to representatives of the department.</u> <u>18. Not provide materially incorrect, misleading, incomplete or untrue information on any email, application or any other document filed with the department.</u>
6VAC20-171-280.	19	Private security services instructor administrative requirements and standards of conduct.	Insert provision to include firearms instructors for the purpose of safety, health and welfare of students. Armed registrants are also held to this standard of conduct. <u>19. Transport, carry and utilize firearms while on duty only in a manner that does not endanger the public health, safety and welfare.</u>
6VAC20-171-280.	20	Private security services instructor administrative requirements and standards of conduct.	Insert provision to ensure that the training school director is informed and able to report the incident to the business and the department. This will allow the business to discontinue to utilize a person not qualified to carry a firearm and also allows for the Department to follow up to ensure compliance. <u>20. Report in writing to the training school director within 24 hours of any person regulated under this chapter who fails to re-qualify with a minimum passing score on the range.</u>
6VAC20-171-280.	21	Private security services instructor administrative requirements and standards of conduct.	Insert provision to ensure that an individual is properly noticed and does not continue to utilize a firearm that he is not qualified to carry. <u>21. Provide any person who fails to requalify with a minimum passing score on the range with a failure to re-qualify notice provided by the department.</u>
6VAC20-171-290.	A3	Instructor Alternatives	Insert subsection to clarify the policy utilized by the department and is consistent with the period of time instructor certifications are issued.

			<u>A. 3. The department may issue a written authorization for a period not to exceed 24 months.</u>
6VAC20-171-300.		Private security training session.	Insert the word <u>services</u> after the word security in the title.
6VAC20-171-300. B	3	Private security services training session.	Insert provision under administrative requirements to ensure schools submit new training courses for approval during school certification period. <u>3. Course outline and training objectives must be approved by the department prior to offering a course of instruction for enrollment.</u>
6VAC20-171-300. B3	4	Private security services training session.	Insert language that details the information a school will be required to capture on a training completion form, this information will be needed as the department moves towards a web-based licensing system. .34. On a form provided by the department, the The training school director shall issue an original training completion form <u>provided by the department and training certificate</u> to each student who satisfactorily completes a training session no later than five business days following the training completion date. Delete the proposed language a-g.
6VAC20-171-300. B4	5	Private security services training session.	Amend 4.5. In a manner approved by the department, the training school director shall submit an original training completion roster to the department affirming each student's successful completion of the session. The training completion roster shall be received by the department within seven calendar days, or postmarked if mailed, no later than five business days following the training completion date. The training completion roster for each session must be <u>and</u> accompanied by the applicable, nonrefundable processing fee.
6VAC20-171-300. B5	6	Private security services training session.	Delete reference to compliance agents. All requirements for compliance agents are established under 6VAC20-171-(70-72.) This section should only address the training provided for registered personnel. In addition, insert language referencing practical exercises that require grading. 5-6. A written examination shall be administered at the conclusion of each entry level training session.

			<p>The examination shall be based on the applicable learning objectives. The student must attain a minimum grade of 80% for compliance agent entry-level training or 70% for all other entry-level training examinations and pass any applicable practical exercises, to satisfactorily complete the training session.</p> <p>Reformat numbering for 6-10</p>
6VAC20-171-300. B8	9	Private security services training session.	<p>Insert language to decipher between the entry-level and advanced firearms range training.</p> <p>8.9. To successfully complete the <u>handgun or shotgun</u> firearms range training, the individual must achieve a minimum qualification score of 75% of the scoring value of the target.</p>
6VAC20-171-300. B9-11		Private security services training session.	<p>Delete language, this language is no longer needed due to amendments to the regulations this information has been placed in other areas of the regulations to ensure clear concise requirements-</p> <p>9. To successfully complete the private investigator entry level training session, the individual must: a. Successfully complete each of the four graded practical exercises required; and b. Pass the written examination with a minimum score of 70%.</p> <p>10. To successfully complete the personal protection specialist entry level training session, the individual must: a. Complete each of the five graded practical exercises required under protective detail operations pursuant to 6VAC20-171-350 E 6 (the practical exercises must be successfully completed prior to the written examination); and b. Pass the written examination with a minimum score of 70%.</p> <p>11. The unarmed security officer must: a. Complete the required training; and b. Successfully pass the written examination with a minimum score of 70%.</p>
6VAC20-171-300. B	10	Private security services training session.	<p>Insert provision under the training session referencing the qualification score requirements for advanced firearms. This information was inadvertently left out and should be included in this section for clarity of all training session requirements.</p> <p>10. To successfully complete the advanced firearms range training, the individual must achieve a minimum qualification score of 92% of the scoring value of the target.</p>

6VAC20-171-300B	11	Private security services training session.	<p>Insert new requirement for patrol rifle training</p> <p><u>11. To successfully complete the patrol rifle firearms range training, the individual must achieve a minimum qualification score of 85% of the scoring value of the target</u></p>
6VAC20-171-300.C2		Private security services training session.	<p>Delete the make-up training may be completed at the next available session offered by the training school, training should be completed timely and 60 days is ample time to make up tardiness and absenteeism to ensure the student is getting the best possible instruction.</p> <p>C. Attendance. 2. Tardiness and absenteeism will not be permitted. Individuals violating these provisions will be required to make up any training missed. Such <u>All training must be completed within 60 days after the completion of the training session or at the next available session offered by the training school the 12 months prior to application of a registration or certification.</u> Individuals not completing the required training within this period are required to complete the entire training session.</p>
6VAC20-171-300.C3		Private security services training session.	<p>Amend language for clarity and in preparation of the new web-based licensing database and training reporting requirements.</p> <p>3. Individuals that <u>who</u> do not successfully complete the compulsory minimum training standards of the training session shall not be reported to the department except where required pursuant to this chapter issued a training completion form or training certificate.</p>
6VAC20-171-300D2		Private security services training session.	<p>Insert language that will require an instructor to be present during all periods of instruction, this eliminate instructors from conducting training sessions utilizing videos and leaving the classroom which reduces the time students receive continued instruction.</p> <p>D. Standards of conduct. 2. Training sessions will be conducted by certified instructors or other individuals authorized to provide instruction pursuant to this chapter <u>and each of whom must be present for all periods of instruction unless otherwise authorized by the department.</u></p>
6VAC20-171-300D5		Private security services	<p>Amend language, replacing may with the word shall.</p>

		training session.	5. Training sessions may shall not exceed nine hours of classroom instruction per day. Range qualification and practical exercises shall not be considered classroom instruction; however, total training, including the maximum allotment of nine hours classroom instruction and applicable range qualification and practical exercises, shall not exceed 12 hours per day. This does not include time allotted for breaks, meals and testing.
6VAC20-171-300. D9		Private security services training session.	Amend sentence to read: 9. Mandated training conducted that is not conducted in accordance with the Code of Virginia and this chapter is null and void.
6VAC20-171-300. D	11	Private security services training session.	Insert provision to limit regulatory training for registrants to a maximum of one hour during job related in-service training. <u>11. Certifiable in-service training may include a maximum of one hour of instruction dedicated to the review of regulations unless otherwise authorized by the department.</u>
6VAC20-171-300. D	12	Private security services training session.	Amend inserted provision to prohibit live ammunition in the classroom to prevent discharges in classrooms that could have been prevented, the use of live ammunition must be limited to a secure range facility only. 12. There will be no live ammunition permitted in the classroom. Live ammunition, pyrotechnics, and explosives are not to be utilized or present in any firearms training environment except on a firing range approved by the department.
6VAC20-171-305.	<u>On-line In-Service Training Programs</u>		Delete previous language that is not needed and replace section with requirements for Online In-Service Training Programs. Article 3 Private Security Services Registered Personnel General Requirements All registered personnel are required to maintain administrative requirements and standards of conduct as determined by the Code of Virginia, department guidelines and this chapter.
6VAC20-171-305.	1-10	Online In-Service Training Programs	Amend the inserted section addressing online training sessions, the requirements are consistent to those established for classroom training sessions. This allows the department and industry to move forward with evolving technology and will assist in reducing time and expense to regulated individuals as they meet their in-service training requirements.

		<p><u>On-line training programs may only be offered for compulsory minimum in-service training requirements. On-line training programs shall meet the following requirements:</u></p> <ol style="list-style-type: none"> 1. <u>All on-line schools shall maintain a private security services training school certification in good standing and meet all of the administrative requirements and standards of conduct specified in this chapter.</u> 2. <u>All online training courses must meet the minimum compulsory in-service training standards pursuant to 6VAC20-171-360 to include topic and hour requirements.</u> 3. <u>All on-line training courses must provide that a private security services instructor certified in the category of training in which the course is being offered is available to the students during normal business hours.</u> 4. <u>All on-line training material to include complete course content, and performance objectives and other applicable instructional material of mandated compulsory training requirements must be approved by the department prior to offering a course of instruction for enrollment.</u> 5. <u>Certifiable in-service training may include a maximum of one hour of instruction dedicated to the review of regulations unless otherwise authorized by the department</u> 6. <u>All on-line training course content, lesson plans, course objectives and other applicable instructional material must be updated every two years to ensure curriculum is current.</u> 7. <u>All on-line training must be delivered through a learning management system (LMS) capable of managing training records, delivering course content, monitoring participation, assessing performance and creating and editing course content.</u> 8. <u>Students enrolled in an on-line training program shall successfully complete all</u>
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			<p><u>course material within 30 days of the first log-on to the training school Learning Management System or prior to the registration or certification expiration date or final reinstatement date.</u></p> <p><u>9. All online training must include assessment instruments which evaluate student performance.</u></p> <p><u>10. Training schools offering on-line courses that accept credit card payments shall subscribe to an e-commerce solution service to protect the security and integrity of the monetary transaction.</u></p> <p><u>11. The learning management system used by a certified training school shall allow the department auditing access to the training system. Such auditing access shall be available 24 hours a day, seven days a week.</u></p> <p><u>12. The Learning Management System shall be capable of generating a unique electronic notification of training completion for each student completing the course requirements and each course of instruction on a 24-hour a day basis.</u></p> <p><u>13The training of completion shall include the following:</u></p> <ul style="list-style-type: none"> <u>a. The name, a unique identification number, and address of the individual;</u> <u>b. The name of the particular course that the individual completed;</u> <u>c. Dates of course completion;</u> <u>d. Name, address, telephone number, and license number of the training school; and</u> <u>e Name, and DCJS identification number of the school director and primary instructor.</u> <p><u>14. The Learning Management System shall be capable of generating a training certificate for each student and each course of instruction that can be printed by the student's computer and printer. This training certificate shall only be made available to the student upon successful completion of all course material.</u></p> <p><u>15. The Learning Management System shall be capable of capturing and archiving student information for a period of not less</u></p>
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			<p><u>than three years.</u></p> <p><u>10. Training schools offering on-line training courses will designate one individual as the network administrator for that school's network server. The network administrator will be the technical contact between the department and the training school. Upon termination of the services of the designated network administrator, a new administrator shall be designated and notification made to the department within 10 days after effective date of the change.</u></p>
<p><u>6VAC20-171-308.</u></p>	<p>A (1-10) B(1-12)</p>	<p><u>Detector Canine Handler Examiners administrative requirements and standards of conduct.</u></p>	<p>Insert entire section of administrative requirements and standards of conduct for Detector Canine Handler examiners, pursuant to the authority granted under 9.1-138 et seq. The Department met with an ad hoc committee and members of the industry to establish the regulatory requirements for the Detector Canine Handler Examiners. The administrative requirements and standards of conduct are also consistent with all other regulated individuals within the regulations.</p> <p><u>6VAC20-171-308. Detector canine handler examiners administrative requirements and standards of conduct.</u></p> <p><u>A. Administrative requirements. An examiner shall:</u></p> <ol style="list-style-type: none"> <u>1. Maintain at all times with the department his mailing address and email address if applicable. Written notification of any address change shall be in writing and received by the department no later than 10 days after the effective date of the change.</u> <u>2. Inform the department, and the business or training school for which the individual is employed, if applicable, in writing within 10 days after pleading guilty or nolo contendere, and after being convicted or found guilty of any felony or of a misdemeanor as outlined in § 9.1-139 K of the Code of Virginia.</u> <u>3. Inform the department, and the licensed business or training school for which the individual is employed or utilized, in writing within 10 days after having been found guilty by any court or administrative body of competent jurisdiction to have violated the private security services business statutes or regulations of that jurisdiction.</u> <u>4. Satisfy all judgments to include binding arbitrations related to private security services not provided.</u>

		<p>5. <u>Notify the department within 10 calendar days following termination of his employment as an examiner for a business or training school.</u></p> <p>6. <u>Conduct examinations in accordance with the standards of the Department of Defense Military Working Dog program Scientific Working Group on Dog and Orthogonal Detector Guidelines, or other nationally recognized organization approved by the Department.</u></p> <p>7. <u>Notify the department within 10 calendar days following termination of any certification as a detector canine handler examiner or equivalent with any national organization, unit of the United States military, or other formal entity involved with certifying, training or setting standards for detection canines.</u></p> <p>8. <u>Notify the department in writing within 10 calendar days of determining that a detector canine handler or detector canine fails to successfully complete the certification examination.</u></p> <p>9. <u>Maintain documentation and a photograph of the examined detector canine team for three years for all examinations conducted that verifies compliance with requirements pursuant to the Code of Virginia and this chapter.</u></p> <p>10. <u>Utilize only department-approved certification examinations for the testing and certification of detector canine teams.</u></p> <p><u>B. Standards of conduct. An examiner shall:</u></p> <p>1. <u>Conform to all requirements pursuant to the Code of Virginia and this chapter.</u></p> <p>2. <u>Not have been convicted or found guilty in any jurisdiction of the United States of any felony or a misdemeanor involving moral turpitude, assault and battery, damage to real or personal property, controlled substances or imitation controlled substances as defined in Article 1 (§ 18.2-247 et seq.) of Chapter 7 of Title 18.2 of the Code of Virginia, prohibited sexual behavior as described in Article 7 (§ 18.2-61 et seq.) of Chapter 4 of Title 18.2 of the Code of Virginia, or firearms. Any plea of nolo contendere shall be considered a conviction for the purpose of this chapter. The record of conviction certified or authenticated in such form as to be admissible in evidence under the laws of the jurisdiction where convicted shall be prima facie evidence of such guilt.</u></p> <p>3. <u>Not violate or aid and abet others in violating the provisions of Article 4 (§ 9.1-138 et seq.) of Chapter 1 of Title 9.1 of the Code of Virginia or this chapter.</u></p> <p>4. <u>Not commit any act or omission that results in a private security license, registration, or certification</u></p>
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	Article 4	Private Security Services Registered Personnel	Insert Article Title
6VAC20-171-310.3		Registered personnel administrative requirements.	<p>Insert language to limit the reporting of convictions to those that could result in the ineligibility of a licensure/registration or certification pursuant to the Code.</p> <p>3. Inform the department, and the business for which the individual is employed if applicable, in writing within 10 days after pleading guilty or nolo contendere or being convicted or found guilty of any felony or of a misdemeanor <u>as outlined in §9.1-139 (K) of the Code of Virginia.</u></p>
6VAC20-171-310.4		Registered personnel administrative requirements.	Delete the language there being no appeal therefrom or the time for appeal having elapsed.
6VAC20-171-320.4		Registered personnel standards of conduct.	Delete the language from which no appeal is pending, the time for appeal having elapsed.
6VAC20-171-		Registered	Insert proper terminology as well as include the

<p>320.7</p>		<p>personnel standards of conduct</p>	<p>categories of registration that are eligible to be employed for 90 days pursuant to §9.1-139(H)</p> <p>7. Carry a valid registration <u>card</u> or valid temporary authorization <u>registration letter</u> at all times while on duty. Individuals requiring registration as <u>an unarmed security officer, an alarm respondent, a locksmith, a central station dispatcher, an electronic security sales representative or an electronic security technician</u> may be employed for not more than 90 consecutive days in any category listed above while completing the compulsory minimum training standards and may not be employed in excess of 120 days without having been issued a registration or an exception from the department <u>and must carry a photo ID and authorization from their employer on a form provided by the Department at all times while on duty.</u></p>
<p>6VAC20-171-320.8</p>		<p>Registered personnel standards of conduct</p>	<p>Insert proper terminology and delete all references to photo identification.</p> <p>8. Carry the private security state issued photo registration identification <u>card</u> at all times while on duty once the authorization has been approved from the department, except those individuals operating outside the Commonwealth of Virginia who shall obtain the state issued photo identification <u>registration card</u> prior to providing services when physically located in the Commonwealth.</p>
<p>6VAC20-171-320.10</p>		<p>Registered personnel standards of conduct</p>	<p>Insert language that requires written authority by the business for regulated armed employees to utilize a patrol rifle.</p> <p>10. Possess a valid firearms training endorsement if he carries or has access to firearms while on duty and then only those firearms by type of action and caliber to which he has been trained on and is qualified to carry. <u>Carry or have access to a patrol rifle while on duty only with the expressed written authorization of the licensed private security services business employing the registrant.</u></p>
<p>6VAC20-171-320.11</p>		<p>Registered personnel standards of conduct</p>	<p>Insert the requirement that the authorization to carry concealed while on the job is documented by the private security services business.</p> <p>11. Carry a firearm concealed while on duty only with the expressed <u>written</u> authorization of the licensed private security services business employing the registrant and only in compliance with § 18.2-308 of the Code of Virginia.</p>

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

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

			<p>B. Training will be credited only if application for registration or certification is <u>submitted to received</u> by the department within 12 months of completion of training.</p>
6VAC20-171-350.C		Entry level training.	<p>The entry-level training has been restructured to include specific courses and hours for clarity. In addition, the minimum course and hour requirements for locksmiths and detector canine handlers have been added. The compulsory minimum training standards for armed security officers have increased from 40 hours to 50 hours due to an increase in firearms training hours and the hours for shotgun entry-level training have increased from 2 to 4 hours.</p> <p>C. Hour <u>Course and minimum hour</u> requirement. The compulsory minimum entry level training <u>courses and specific minimum</u> hour requirement by category, excluding examinations, practical exercises and range qualification, shall be:</p>
6VAC20-171-350.C1-12		Entry level training.	<p>Amend entire section C to specify the training courses required of each registration category. This amendment includes the course code, hours and title of the mandated training, in addition, the training requirements have been inserted for detector canine handlers and locksmiths in accordance with the authority granted under 9.1-138 et seq. In addition all proposed references to a separate private security orientation course (10E) were removed.</p> <p>C. Hour <u>Course and minimum hour</u> requirement. The compulsory minimum entry level training <u>courses and specific minimum</u> hour requirement by category, excluding examinations, practical exercises and range qualification, shall be:</p> <ol style="list-style-type: none"> 1. Unarmed security officer —18 hours <ol style="list-style-type: none"> a. <u>01E: Security Officer Core Subjects – 18 hours</u> 2. Armed security officer/courier —40 hours — <u>50 hours (53 hours including shotgun training)</u> <p>*There are 8 hours of Arrest Powers, Policies, Procedures that are included in the Armed Security Officer Training. These 8 hours are mandatory for armed security officers only.</p> <ol style="list-style-type: none"> a. <u>01E: Security Officer Core Subjects – 18 hours</u> b. <u>05E: Armed Security Officer Arrest Authority – 8 hours</u> c. <u>75E: Security Officer Handgun – 24 hours</u> d. <u>08E: Entry-level Shotgun – 3 hours (if applicable*)</u> * To also have access to a shotgun

		<p><u>while on duty, the additional shotgun course is required.</u></p> <p>3. <u>Armored car personnel —26 hours — 28 hours (31 hours with shotgun)</u></p> <p>a. <u>03E: Armored Car Procedures — 12 hours</u></p> <p>b. <u>07E: Entry-level Handgun — 16 hours</u></p> <p>c. <u>08E: Entry-level Shotgun — 3 hours (if applicable*) * To also have access to a shotgun while on duty, the additional shotgun course is required.</u></p> <p>4. <u>Security canine handler —30 hours (excluding basic obedience training)</u></p> <p>a. <u>01E: Security Officer Core Subjects — 18 hours (prerequisite for 04ES)</u></p> <p>b. <u>Prerequisite for 04ES — Basic Obedience Training</u></p> <p>c. <u>04ES: Security Canine Handler — 12 hours</u></p> <p>5. <u>Private investigator —60 hours</u></p> <p>a. <u>02E: Private Investigator Subjects — 60 hours</u></p> <p>6. <u>Personal protection specialist —60 hours</u></p> <p>a. <u>32E: Personal Protection Specialist —60 hours</u></p> <p>b. <u>07E Entry-level Handgun — 16 hours (prerequisite for 09E Advanced Handgun)</u></p> <p>c. <u>09E: Advanced Handgun — 14 hours (for armed personal protection specialists)</u></p> <p>7. <u>Alarm respondent —18 hours</u></p> <p>a. <u>01E: Security Officer Core Subjects — 18 hours</u></p> <p>8. <u>Central station dispatcher —8 hours</u></p> <p>a. <u>30E: Electronic Security Core Subjects —4 hours</u></p> <p>b. <u>38E: Central Station Dispatcher — 4 hours</u></p> <p>9. <u>Electronic security sales representative —8 hours</u></p> <p>a. <u>30E: Electronic Security Core Subjects — 4 hours</u></p> <p>b. <u>39E: Electronic Security Sales — 4 hours</u></p> <p>10. <u>Electronic security technician —14 hours</u></p> <p>a. <u>30E: Electronic Security Core Subjects — 4 hours</u></p> <p>b. <u>35E: Electronic Security Technician — 10 hours</u></p> <p>11. <u>Electronic security technician's assistant —4 hours</u></p> <p>a. <u>30E: Electronic Security Core Subjects — 4 hours</u></p> <p>12. <u>Detector Canine Handler — 160 hours (excluding certification examination)</u></p> <p>a. <u>04ED: Detector Canine Handler — 160 hours</u></p> <p>b. <u>Certification exam by a Certified Detector Canine Handler Examiner</u></p> <p>13. <u>Locksmith — 18 hours</u></p> <p>a. <u>25E: Locksmith — 18 hours</u></p>
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6VAC20-171-350.C12		Entry level training.	<p>Strike reference to compliance agents, this section has been amended to address training requirements for registered personnel only. Compliance agent requirements are outlined in 6VAC20-171-70 of this chapter.</p> <p>12. Compliance agent — 6 hours</p>
6VAC20-171-350.D1-12	D1-D14	Entry level training.	<p>The course content has been amended to reflect changes to the content for armed security officer classroom training, and the hour requirements for each individual section of a course has been removed. The proposed regulations reflect the course content for locksmiths and detector canine handler examiners and all training provisions for compliance agents has been deleted and added to section 6 VAC 20-171-70-172. In addition, pursuant to the recommendation of the Secure Commonwealth Panel the Seven Signs of Terrorism topic was included in the mandated entry-level training curriculum for private security personnel and has been amended to read Signs of Terrorism.</p> <p>D. Course content. The compulsory minimum entry level training course content by category <u>specific course</u>, excluding examinations, mandated practical exercises and range qualification, shall be as provided in this subsection.</p> <p>1. Security officer core subjects. <u>(01E) – 18 hours (excluding examination)</u></p> <p>The entry level curriculum for unarmed security officer, armed security officer/courier, security canine handler, and alarm respondent sets forth the following areas identified as:</p> <p>a. Orientation —2 hours</p> <p>(1) Virginia law and regulations-Applicable sections of the Code of Virginia and Regulations Relating to Private Security Services</p> <p>(2) Code of ethics</p> <p>(3) General duties and responsibilities</p> <p><u>(4) The Seven Signs of Terrorism</u></p> <p>b. Law —4 hours</p> <p>c. Security patrol, access control and communications —2 hours</p>

		<p>d. Documentation —4 hours</p> <p>e. Emergency procedures —4 hours</p> <p>f. Confrontation management —2 hours</p> <p>g. <u>Use of force</u></p> <p>h. <u>Written comprehensive examination</u> Total hours (excluding exam) —18 hours</p> <p>2. <u>Armed security officer/courier. Armed Security Officer Arrest Authority (05E) – 8 hours (excluding examination)</u></p> <p>a. <u>Arrest powers, policies and procedures</u></p> <p>b. <u>Written comprehensive examination</u></p> <p>a. Security officer core subjects —18 hours</p> <p>b. <u>Entry level handgun training (refer to Article 2 (6VAC20-171-365et seq.) of this part) —14 hours (includes dry fire, and judgmental shooting and low level light shooting familiarization)</u></p> <p>c. <u>Arrest powers, policies, procedures—8 hours</u></p> <p>d. <u>Entry level shotgun training, if applicable (refer to Article 2 (6VAC20-171-365et seq.) of this part) —2 hours</u> Total hours (excluding examinations, shotgun classroom instruction and range qualification) —40 hours</p> <p>3. <u>Armored car personnel. (03E) – 12 hours (excluding examination)</u></p> <p>a. Administration and armored car orientation —1 hour</p> <p><u>(1) The Seven Signs of Terrorism</u></p> <p>b. <u>Applicable sections of the Code of Virginia and DCJS regulations-Regulations Relating to Private Security Services] —1 hour</u></p> <p>c. Armored car procedures —10 hours</p> <p>d. <u>Written comprehensive examination</u></p> <p>e. <u>Entry level handgun training (refer to Article 2 (6VAC20-171-365 et seq.) of this part) —14 hours (includes 4 hours of range dry fire and low level lighting)</u></p> <p>f. <u>Entry level shotgun training, if applicable (refer to Article 2 (6VAC20-171-365 et seq.) of this part) —2 hours</u> Total hours (excluding examinations, shotgun classroom instruction and range qualification) —26 hours</p>
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		<p>4. <u>Security canine handler. (04ES) 12 hours (excluding examination and basic obedience training)</u></p> <p><u>a. Prerequisites for security canine handler entry level (official documentation required): Successful completion of basic obedience training.</u></p> <p><u>b. Demonstration of proficiency. The student must demonstrate his proficiency in the handling of a security canine to satisfy the minimum standards</u></p> <p><u>c. Evaluation by a certified private security canine handler instructor and basic obedience retraining</u></p> <p><u>d. Security canine handler orientation/legal authority</u></p> <p><u>e. Canine patrol techniques</u></p> <p><u>f. Written comprehensive examination</u></p> <p><u>Complete entry level training requirements pursuant to Article 3 (6VAC20-171-430 et seq.) of this part.</u></p> <p>5. <u>Private investigator. (02E) –60 hours (excluding examination and practical exercises)</u></p> <p><u>a. Orientation: applicable sections of the Code of Virginia; Administrative Code 6VAC20-171; standards of professional conduct; and ethics –6 hours</u></p> <p><u>(1) Applicable sections of the Code of Virginia</u></p> <p><u>(2) Administrative Code 6VAC 20-171 et seq. Regulations Relating to Private Security Services</u></p> <p><u>(3) Standards of professional conduct</u></p> <p><u>(4) Ethics</u></p> <p><u>(5) The Seven Signs of Terrorism</u></p> <p><u>b. Law: basic law; legal procedures and due process; civil law; criminal law; evidence; and legal privacy requirements – 16 hours plus one practical exercise</u></p> <p><u>(1) Basic law</u></p> <p><u>(2) Legal procedures and due process</u></p> <p><u>(3) Criminal and Civil law</u></p> <p><u>(4) Evidence</u></p> <p><u>(5) Legal privacy requirements</u></p> <p><u>c. General investigative skills, tools and</u></p>
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		<p>techniques: surveillance; research; and interviewing – 16 hours plus one practical exercise</p> <p><u>(1) Tools and techniques</u></p> <p><u>(2) Surveillance</u></p> <p><u>(3) Research</u></p> <p><u>(4) Interviewing</u></p> <p>d. Documentation: Report preparations; photography; audio recording; general communication; and courtroom testimony – 8 hours plus one practical exercise</p> <p><u>(1) Report preparations</u></p> <p><u>(2) Photography</u></p> <p><u>(3) Audio recording</u></p> <p><u>(4) General communication</u></p> <p><u>(5) Courtroom testimony</u></p> <p>e. Types of investigations: accident; insurance; background; domestic; undercover; fraud and financial; missing persons and property; and criminal – 14 hours plus one practical exercise</p> <p><u>(1) Accident</u></p> <p><u>(2) Insurance</u></p> <p><u>(3) Background</u></p> <p><u>(4) Domestic</u></p> <p><u>(5) Undercover</u></p> <p><u>(6) Fraud and financial</u></p> <p><u>(7) Missing persons and property</u></p> <p><u>(8) Criminal</u></p> <p>f. Written comprehensive examination</p> <p>Total hours in classroom (excluding written examination and practical exercises) – 60 hours</p> <p>6. Personal protection specialist. <u>(32E) –60 hours (excluding written examination and practical exercises)</u></p> <p>a. Administration and personal protection orientation –3 hours</p> <p><u>(1) The Seven Signs of Terrorism</u></p> <p>b. Applicable sections of the Code of Virginia and DCJS regulations –1 hour</p> <p>c. Assessment of threat and protectee vulnerability –8 hours</p> <p>d. Legal authority and civil law –8 hours</p>
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		<p>e. Protective detail operations —28 hours</p> <p>f. Emergency procedures —12 hours</p> <p>(1) CPR</p> <p>(2) Emergency first aid</p> <p>(3) Defensive preparedness</p> <p>g. Performance evaluation – Five practical exercises</p> <p>h. Written <u>comprehensive</u> examination</p> <p>Total hours (excluding written examination and performance evaluation) — 60 hours</p> <p>7. Alarm respondent.</p> <p>Security officer core subjects —18 hours</p> <p>8.7. Electronic security <u>core</u> subjects. (30E) – 4 hours (excluding examination) The entry level electronic security subjects curriculum for central station dispatcher, electronic security sales representative, electronic security technician and electronic security technician's assistant sets forth the following areas identified as:</p> <p>a. Administration and orientation to private security —1 hour <u>a. Administration and orientation</u></p> <p>(1) Applicable sections of the Code of Virginia</p> <p>(2) Administrative Code 6VAC20-171 et seq. Regulations Relating to Private Security Services</p> <p>(3) The Seven Signs of Terrorism</p> <p>b. Applicable sections of the Code of Virginia and DCJS regulations —1 hour</p> <p>e. <u>b.</u> Overview of electronic security —1 hour</p> <p>d. <u>c.</u> False alarm prevention —1 hour</p> <p>e. <u>d.</u> Written <u>comprehensive</u> examination</p> <p>Total hours (excluding examination) —4 hours</p> <p>9.8. Central station dispatcher. (38E) – 4 hours (excluding examination)</p> <p>a. Electronic security subjects —4 hours</p> <p>b. <u>a.</u> Central station dispatcher subjects —4 hours</p> <p>(1) Duties and responsibilities</p> <p>(2) Communications skills</p> <p>(3) Emergency procedures</p> <p>e. <u>b.</u> Written <u>comprehensive</u> examination</p> <p>Total hours (excluding examination) — 8 hours</p>
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		<p>40.9. Electronic security sales representative. (39E) 4 hours (excluding examination)</p> <p>a. Electronic security subjects—4 hours</p> <p>b. a. Electronic security sales representative subjects—4 hours</p> <p>(1) Duties and responsibilities</p> <p>(2) System design/components</p> <p>(3) False alarm prevention</p> <p>e. b. Written <u>comprehensive</u> examination</p> <p>Total hours (excluding examination)—8 hours</p> <p>44.10. Electronic security technician. (35E) – 4 hours (excluding examination)</p> <p>a. Electronic security subjects—4 hours</p> <p>b. a. Electronic security technician subjects – 10 hours</p> <p>(1) Duties and responsibilities</p> <p>(2) Electronics</p> <p>(3) Control panels</p> <p>(4) Protection devices and application</p> <p>(5) Test equipment</p> <p>(6) Power and grounding</p> <p>(7) National electrical code</p> <p>(8) Job safety</p> <p>e. b. Written <u>comprehensive</u> examination</p> <p>Total hours (excluding examination)—14 hours</p> <p>12. Compliance agent.</p> <p>a. Industry overview and responsibilities</p> <p>b. Regulations review</p> <p>c. Business practices and ethical standards</p> <p>d. Records requirements and other related issues</p> <p>e. Written examination</p> <p>Total hours (excluding written examination)—6 hours</p> <p><u>11. Detector Canine Handler (04ED) – 160 hours to include practical exercises (excluding certification exam)</u></p> <p><u>a. Introduction/orientation/administration</u></p> <p><u>(1) Code of Ethics</u></p> <p><u>(2) General Duties and Responsibilities</u></p> <p><u>(3) Legal</u></p>
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		<p><u>(4) Applicable sections of the Code of Virginia and Regulations Relating to Private Security Services</u></p> <p><u>(5) The Seven Signs of Terrorism</u></p> <p><u>b. Working Canines</u></p> <p><u>(1) Historical Perspective</u></p> <p><u>(2) Terms and Definitions</u></p> <p><u>(3) Methodology and Application</u></p> <p><u>(4) Training Documentation</u></p> <p><u>(5) Search Patterns</u></p> <p><u>c. Basic Canine Handling (including practical exercises)</u></p> <p><u>(1) Training</u></p> <p><u>(2) Care and Health</u></p> <p><u>(3) Emergency Medical Care</u></p> <p><u>d. Detector Canine Deployment</u></p> <p><u>Canine Behavior: Reading and Understanding</u></p> <p><u>e. Explosive or Narcotics Familiarization (including practical exercises)</u></p> <p><u>(1) Illegal Narcotics Familiarization</u></p> <p><u>(2) Explosives Substance and I.E.D. Familiarization</u></p> <p><u>(3) Safety</u></p> <p><u>f. Written comprehensive exam</u></p> <p><u>12. Locksmith (25E) – 18 hours (excluding examination)</u></p> <p><u>a. Code of Virginia and Regulations Relating to Private Security Services</u></p> <p><u>(1) The Seven Signs of Terrorism</u></p> <p><u>b. Orientation to Locksmithing</u></p> <p><u>(1) History of locksmithing</u></p> <p><u>(2) Ethics</u></p> <p><u>(3) Trade resources</u></p> <p><u>(4) Terminology</u></p> <p><u>(5) Professional conduct</u></p> <p><u>(6) Job safety</u></p> <p><u>c. Public Safety Codes</u></p> <p><u>(1) NFPA (80, 101)</u></p> <p><u>(2) Overview of Authorities Having Jurisdiction (AHJs)</u></p> <p><u>(3) ADA</u></p> <p><u>(4) Terminology</u></p>
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			<p><u>(5) Safety code resources</u></p> <p><u>d. Technical Applications</u></p> <p><u>(1). Terminology (to include definition/purpose/function)</u></p> <p><u>(2) Locks/types</u></p> <p><u>(3) Handing</u></p> <p><u>(4) Master keying</u></p> <p><u>(5) Key records and codes</u></p> <p><u>(6) Key blanks and keyways</u></p> <p><u>(7) Physical security</u></p> <p><u>(8) Types of client sites</u></p> <p><u>(9) Safes/vaults</u></p> <p><u>(10) Access control</u></p> <p><u>(11) Handling restricted keys</u></p> <p><u>(12) Door system components</u></p> <p><u>(13) Automotive</u></p> <p><u>e. Written comprehensive examination</u></p>
6VAC20-171-360.A		In-service training	<p>The amendments include in-service training requirements for locksmiths and detector canine handlers and combines the course content and minimum hour requirements within one section (Section B) thus eliminating the need for Section C.</p> <p>A. Each person registered with the department as an armed security officer/courier, personal protection specialist, armored car personnel, security canine handler, <u>narcotics detector canine handler</u>, <u>explosives detector canine handler</u>, private investigator, alarm respondent, <u>locksmith</u>, central station dispatcher, electronic security sales representative, electronic security technician, unarmed security officer or electronic security technician's assistant, or certified by the department to act as a compliance agent shall complete the compulsory in-service training standard once during each 24-month period of registration or certification.</p>
6VAC20-171-360.A1		In-service training	<p>Delete the training requirements for compliance agents and instructors. This information is inserted into the sections addressing each individual certification and removed from this section which addresses in-service training for registered personnel.</p> <p>1. Compliance agent.</p> <p>a. In service training must be completed within 12 months immediately preceding the expiration date.</p>

			<p>b. Individuals who fail to complete in-service training prior to the established expiration date may complete in-service training within 30 days after the expiration date if a completed in-service training enrollment application and a \$25 delinquent training fee is received by the department.</p> <p>2. Instructor. All private security instructors must complete instructor in-service training within 12 months immediately preceding the individual's expiration date.</p>
6VAC20-171-360.B		In-service training	<p>Amend language to combine the course content and minimum hour requirements within one section (Section B) thus eliminating the need for Section C.</p> <p>B. <u>Course Content and minimum hour</u> Hour requirement. The compulsory minimum in-service training <u>content and minimum</u> hour requirement by category, excluding examinations, practical exercises and range qualification, shall be as follows:</p>
6VAC20-171-360.B 1-14		In-service training	<p>These amendments include in-service training requirements for locksmiths and detector canine handlers and combines the course content and minimum hour requirements within one section (Section B) thus <u>eliminating the need for Section C</u>. These amendments also include the in-service training requirements for security canine handlers which were deleted from VAC20-171-430. The in-service training requirements for compliance agents and general instructors was deleted from this section and inserted in the sections addressing the individual certification requirements.</p> <p>Amend the training under 8-11 to incorporate one Electronic Security Subjects In-Service training for Central station dispatchers, Electronic security sales reps, technicians and tech assistants.</p> <p>1. Unarmed security officer: <u>(01I) Security Officer Core Subjects In-Service</u> – 4 hours <u>Job-related training</u></p> <p>2. Armed security officer/courier <u>(01I) Security Officer Core Subjects In-Service</u> – 4 hours <u>(not including range retraining)</u> <u>Job-related training</u></p> <p>3. Armored car personnel <u>(03I) Armored Car Personnel In-Service</u> – 4 hours <u>(not including range retraining)</u> <u>Job-related training</u></p> <p>4. Security canine handler <u>(04IS) Security Canine Handler In-Service</u> – 8 hours</p>

			<p><u>a. Basic obedience evaluation and retraining</u></p> <p><u>b. Canine grooming, feeding, and health care</u></p> <p><u>c. Apprehension techniques</u></p> <p><u>d. Obedience</u></p> <p>5. <u>Private investigator (02I) Private Investigator In-Service – 8 hours</u></p> <p><u>Job-related training</u></p> <p>6. <u>Personal protection specialist (32I) Personal Protection Specialist In-Service – 8 hours (not including range retraining for armed)</u></p> <p><u>Job-related training</u></p> <p>7. <u>Alarm respondent (01I) Security Officer Core Subjects In-Service – 4 hours</u></p> <p><u>Job-related training</u></p> <p>8. <u>Central station dispatcher (38I) Central Station Dispatcher (30I) Electronic Security Subjects In-Service – 4 hours</u></p> <p><u>Job-related training</u></p> <p>9. <u>Electronic security sales representative (39I) Electronic Sales Representative 30I) Electronic Security Subjects In-Service – 4 hours</u></p> <p><u>Job-related training</u></p> <p>10. <u>Electronic security technician (35I) Electronic Technician 30I) Electronic Security Subjects In-Service – 4 hours</u></p> <p><u>Job-related training</u></p> <p>11. <u>Electronic security technician's assistant (30I) Electronic Security Subjects In-Service – 2 4 hours</u></p> <p><u>Job-related training</u></p> <p>12. <u>Compliance agent – 4 hours <u>Detector canine handler (04ID) Detector Canine Handler In-Service – 8 hours (excluding certification exam)</u></u></p> <p><u>a. Detector canine team retraining and problem solving</u></p> <p><u>b. Search techniques</u></p> <p><u>c. Terrorist/criminal intelligence updates and team safety</u></p> <p><u>d. Certification exam (conducted by a certified detector canine handler examiner)</u></p> <p>13. <u>Firearms instructor – 4 hours <u>Locksmith (25I) Locksmith In-Service – 4 hours</u></u></p> <p><u>Job-related training</u></p> <p>14. <u>General instructor – 4 hours</u></p>
6VAC20-171-360.C		In-service training	Delete section C
6VAC20-171-365	A	General firearms	Insert outline due to insertion of additional subsections.

		training requirements.	<p><u>A.</u> Firearms training endorsement is required for all private security services business personnel who carry or have immediate access to a firearm while on duty. Each person who carries or has immediate access to firearms while on duty shall qualify with each type of action and caliber of firearm to which he has access.</p>
6VAC20-171-365	B-D	General firearms training requirements.	<p>Insert subsections to address fundamental, basic and advanced firearms training requirements. These changes are the result of the recommendation of the Private Security Services Advisory Board Training Committee with the input of certified firearms instructors and interested members of the industry. An enhanced firearms training for armed security officers/couriers and personal protections specialist has been inserted (6VAC20-171-375) and reflects an increase of 10 hours of training compared to the basic firearms training for all other armed registered categories and the advanced handgun training has been amended with a decrease of 10 hours of training.</p> <p><u>.B. Each person registered as armored car personnel, security canine handler, detector canine handler, private investigator, alarm respondent, locksmith, central station dispatcher, electronic security sales representative, electronic security technician or electronic security technician's assistant must complete entry-level handgun training in order to apply for a firearms endorsement.</u></p> <p><u>.C. Each person applying for a registration as an armed security officer/courier must complete security officer handgun training in order to apply for a firearms endorsement.</u></p> <p><u>D. Each person registered as a personal protection specialist must complete entry-level or armed security officer handgun training and advanced handgun training in order to apply for a firearms endorsement.</u></p>
Entry level handgun training.			
6VAC20-171-370.		Entry level handgun training.	<p>Amend the entry-level firearms training compulsory minimum training standards in order to improve the training provided to the industry. These changes are the result of the recommendation of the Private Security Services Advisory Board Training committee with the input of certified firearms instructors and interested members of the industry. A firearms training for</p>

		<p>armed security officers/couriers and personal protection specialist has been inserted (6VAC20-171-375) and reflects an increase of hours of training compared to the entry-level firearms training for all other armed registered categories.</p> <p>A. Handgun classroom training.</p> <p>1. The entry level handgun classroom training will include but not be limited to the following:</p> <ul style="list-style-type: none"> a. The proper care and maintenance of the firearm; b. Civil liability of the use of firearms; c. Criminal liability of the use of firearms; d. Firearms retention and storage; e. Deadly force; f. Justifiable deadly force; g. Range safety; h. Principles of marksmanship; i. Practical firearms handling and safety; j. Judgmental shooting; and k. Low level light shooting familiarization. <ul style="list-style-type: none"> <u>a. Practical Handgun Handling</u> <ul style="list-style-type: none"> <u>(1) Identification of Handgun parts</u> <u>(2) Draw</u> <u>(3) Reholstering</u> <u>(4) Ready Position</u> <u>(5) Loading</u> <u>(6) Administrative Loading</u> <u>(7) Tactical reloading</u> <u>(8) Rapid Unloading</u> <u>(9) Unloading</u> <u>(10) Malfunctions</u> <u>(11) Immediate Actions Procedures</u> <u>(12) Remedial action</u> <u>(13) Proper care and maintenance</u> <u>(14) Firearms Retention</u> <u>(15) Ammunition Identification and Management</u> <u>(16) Range Safety</u> <u>b. Fundamentals of Marksmanship</u> <ul style="list-style-type: none"> <u>(1) Grip</u> <u>(2) Stance (Position)</u> <u>(3) Sight Alignment</u> <u>(4) Sight Picture</u> <u>(5) Trigger Control</u> <u>(6) Breathing</u> <u>(7) Follow through</u> <u>c. Dim Light / Low Light / Reduced Light Practice and Familiarization</u> <ul style="list-style-type: none"> <u>(1) Identification of Target/Threat/Background</u> <u>(2) Unaided Training</u> <u>(3) Aided Training</u> <u>(4) Flashlight Use</u> <u>(5) Re-loading during low light conditions</u> <u>(6) Malfunctions</u> <u>(7) Range Safety</u>
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			<p>d. <u>Use of Force</u></p> <p>(1) <u>Deadly force</u></p> <p>(2) <u>Justifiable deadly force</u></p> <p>e. <u>Liability</u></p> <p>(1) <u>Criminal liability</u></p> <p>(2) <u>Civil liability</u></p> <p>(3) <u>Negligent discharge prevention</u></p> <p>f. <u>Lead exposure</u></p> <p>Total Hours (excluding written examination) — 44 16 hours</p> <p>2. Written examination required.</p>
6VAC20-171-370.B-D		Range qualification, Course of Fire and Low Light course.	Delete entire section. This section has been amended and moved to 6 VAC20-171-376
	<u>6VAC20-171-375.</u>	<u>Basic handgun training.</u>	<p>Insert a new section addressing basic firearms training. These changes are the result of recommendations of the Private Security Services Advisory Board Training committee with the input of certified firearms instructors and interested members of the industry. Improved training is required in order to reduce the high volume of negligent firearms discharge incidents and raise the standards for the purpose of the safety and welfare of the armed regulated individuals and the general public. The intermediate firearms training reflects an increase of 10 hours of training compared to the basic firearms training for all other armed registered categories.</p> <p><u>A. Handgun classroom training.</u></p> <p><u>1. The basic handgun classroom training will include but not be limited to the following:</u></p> <p><u>a. Practical Handgun Handling</u></p> <p>(1) <u>Identification of Handgun parts</u></p> <p>(2) <u>Draw</u></p> <p>(3) <u>Reholstering</u></p> <p>(4) <u>Ready Position</u></p> <p>(5) <u>Loading</u></p> <p>(6) <u>Administrative Loading</u></p> <p>(7) <u>Tactical reloading</u></p> <p>(8) <u>Rapid Unloading</u></p> <p>(9) <u>Unloading</u></p> <p>(10) <u>Malfunctions</u></p> <p>(11) <u>Immediate Actions Procedures</u></p> <p>(12) <u>Remedial action</u></p> <p>(13) <u>Proper care and maintenance</u></p> <p>(14) <u>Firearms Retention</u></p> <p>(15) <u>Ammunition Identification and Management</u></p> <p>(16) <u>Range Safety</u></p> <p>(17) <u>Tactical considerations</u></p> <p>(18) <u>Movement</u></p>

			<p><u>(19) Cover and concealment</u></p> <p>-</p> <p><u>b. Fundamentals of Marksmanship</u></p> <p><u>(1) Grip</u></p> <p><u>(2) Stance (Position)</u></p> <p><u>(3) Sight Alignment</u></p> <p><u>(4) Sight Picture</u></p> <p><u>(5) Trigger Control</u></p> <p><u>(6) Breathing</u></p> <p><u>(7) Follow through</u></p> <p><u>c. Dim Light / Low Light / Reduced Light Practice and Familiarization</u></p> <p><u>(1) Identification of Target/Threat/Background</u></p> <p><u>(2) Unaided Training</u></p> <p><u>(3) Aided Training</u></p> <p><u>(4) Flashlight Use</u></p> <p><u>(5) Re-loading during low light conditions</u></p> <p><u>(6) Malfunctions</u></p> <p><u>(7) Range Safety</u></p> <p><u>(8) Tactical considerations</u></p> <p><u>(9) Movement</u></p> <p><u>(10) Cover and concealment</u></p> <p><u>(11) Multiple target drills</u></p> <p><u>d. Use of Force</u></p> <p><u>(1) Deadly force</u></p> <p><u>(2) Justifiable deadly force</u></p> <p><u>e. Liability</u></p> <p><u>(1) Criminal liability</u></p> <p><u>(2) Civil liability</u></p> <p><u>(3) Negligent discharge prevention</u></p> <p><u>f. Judgmental shooting: Judgmental shooting scenarios will be conducted in the classroom/range</u></p> <p><u>(1) Shoot/don't shoot judgment</u></p> <p><u>(2) Turn and fire drills</u></p> <p><u>(3) Failure to stop drills</u></p> <p><u>(4) Multiple target drills</u></p> <p><u>g. Lead exposure</u></p> <p><u>Total Hours (excluding written examination) —24 hours</u></p> <p><u>2. Written examination required.</u></p>
	<p><u>6VAC20-171-376.A</u></p>	<p><u>Handgun range qualification.</u></p>	<p>Insert and amend the section for handgun qualifications to include range qualifications, course of fire and low-light course of fire and advanced handgun course of fire. These requirements were included under the current regulations 6 VAC20-171-370B-D. These changes are the result recommendations of the Private Security Services Advisory Board Training committee with the input of certified firearms instructors and interested members of the industry. Improved training is required in order to reduce the high volume of negligent firearms discharge incidents and raise the standards for the purpose of the safety and welfare of the armed regulated</p>

		<p>individuals and the general public.</p> <p><u>A. Range qualification (no minimum hours). The purpose of the range qualification course is to provide practical firearms training and qualification to individuals desiring to become armed private security services business personnel.</u></p> <p><u>1. Prior to the date of range training, it will be the responsibility of the school director to ensure that all students are informed of the proper attire and equipment to be worn for the firing range portion of the training. Equipment needed: handgun, belt with directional draw holster, i.e., one that is worn on the same side of the body as the shooting hand, two speed loaders or three magazines, ammunition (100 rounds)</u></p> <p><u>2. Each student will fire a minimum of 22 rounds of factory loaded ammunition for familiarization prior to qualification. (There is no course of fire and it is not scored; it is at the firearms instructor's discretion on how the round will be utilized.)</u></p> <p><u>3. Course shall be fired double action or double/single action, except for single action semi-automatic handguns.</u></p> <p><u>4. All qualifications shall be conducted using a B-27 silhouette target or the FBI "Q" target. Alternate targets may be utilized with prior approval by the department.</u></p> <p><u>5. With prior approval of the department, a reasonable modification of the firearms course may be approved to accommodate qualification on indoor ranges.</u></p> <p><u>6. For those utilizing semi-automatic firearms, it is not necessary to reload after every stage so long as there are at least 3 tactical reloads during the course of fire.</u></p> <p><u>7. A certified firearms instructor must be present on the range directly controlling the firing line during all phases of firearms training. There shall be a minimum of one certified firearms instructor per five shooters on the line.</u></p> <p><u>8. The range qualification of individuals shall be scored as follows:</u></p> <p><u>a. B27 target: (use indicated K-value) 7, 8, 9, 10 X rings —value 5 points, other hits on silhouette — value 0 points: divide points scored by maximum possible score to obtain decimal and convert to percentage, e.g., $225 \div 300 = .75 = 75\%$.</u></p> <p><u>b. FBI Q target: all hits inside the bottle —value 5 points; hits outside the bottle —value 0 points.</u></p> <p><u>9. Although not scored, each student is required to complete the low light range/night time practice as</u></p>
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			<p><u>outlined in Section C and the familiarization course of fire.</u></p>
	<p><u>6VAC20-171-376.B-C</u></p>	<p><u>Handgun range qualification. Virginia Course of Fire for Handguns</u></p>	<p>Insert and amend the section for handgun qualifications to include range qualifications, course of fire and low-light course of fire and advanced handgun course of fire. These requirements were included under the current regulations 6 VAC20-171-370B-D. These changes are the result recommendations of the Private Security Services Advisory Board Training committee with the input of certified firearms instructors and interested members of the industry. Improved training is required in order to reduce the high volume of negligent firearms discharge incidents and raise the standards for the purpose of the safety and welfare of the armed regulated individuals and the general public.</p> <p><u>B. Course: Virginia private security course of fire for handguns. The course of fire shall be conducted using, at a minimum, the requirements set forth in this subsection. Strong/weak hand refers to the primary hand used in firing the firearm. The opposite hand may be used for support. The course of fire shall be conducted in the following phases:</u></p> <p><u>1. Phase 1: 3 yards, utilizing weaver, modified weaver, or isosceles stance, 18 rounds:</u></p> <p><u>a. Load 6 rounds and holster loaded firearm.</u></p> <p><u>b. On command, draw and fire 2 rounds (3 seconds), repeat 2 times.</u></p> <p><u>c. Load 6 rounds and holster loaded firearm.</u></p> <p><u>d. On command, draw and fire 6 rounds with strong hand.</u></p> <p><u>e. Unload, reload 6 rounds and fire 6 rounds with weak hand (25 seconds.)</u></p> <p><u>2. Phase 2: 7 yards, utilizing weaver, modified weaver or isosceles stance, 24 rounds:</u></p> <p><u>a. Load 6 rounds and holster loaded firearm.</u></p> <p><u>b. On command, draw and fire 1 round (2 seconds), repeat 5 times.</u></p> <p><u>c. Load 6 rounds and holster loaded firearm.</u></p> <p><u>d. On command, draw and fire 2 rounds (3 seconds), repeat 2 times.</u></p> <p><u>e. Load 6 rounds and holster loaded firearm.</u></p> <p><u>f. On command, draw and fire 6 rounds, reload 6 rounds, fire 6 rounds (30 seconds).</u></p> <p><u>3. Phase 3: 15 yards, 70 seconds, 18 rounds</u></p> <p><u>a. Load 6 rounds and holster loaded firearm.</u></p>

			<p><u>b. On command, assume kneeling position, draw and fire 6 rounds with strong hand.</u></p> <p><u>c. Assume standing position, unload, reload and fire 6 rounds from weak-hand barricade position.</u></p> <p><u>d. Unload, reload and fire 6 rounds from strong-hand barricade position (kneeling position may be fired using barricade position) (70 seconds).</u></p> <p><u>C. Low light course: Virginia private security low light familiarization course of fire for handguns. The course of fire shall be conducted using, at a minimum, the requirements set forth in this subsection. Equipment needed: belt with directional draw holster, handgun, two speed loaders or three magazines, range ammunition (18 rounds). Equipment provided by instructor: A range that can simulate low light or a pair of welders goggles for each student that simulates low light. Strong/weak hand refers to the primary hand used in firing the firearm. The opposite hand may be used for support. The course of fire shall be conducted in the following phases:</u></p> <p><u>1. Phase 1; 3 yards, utilizing weaver or isosceles stance, 6 rounds:</u></p> <p><u>a. Load 6 rounds and come to ready</u></p> <p><u>b. On command, fire 2 rounds (3 seconds) repeat 2 times(30 seconds)</u></p> <p><u>2. Phase 2; 7 yards, utilizing weaver or isosceles stance, 12 rounds</u></p> <p><u>a. Load 6 rounds and come to ready</u></p> <p><u>b. On command, fire 2 rounds (5 seconds), repeat 2 times</u></p> <p><u>c. Load 6 rounds and come to ready</u></p> <p><u>d. On command, draw and fire 3 rounds (6 seconds), and repeat.</u></p>
<p>6VAC20-171-380.</p>		<p>Entry level shotgun training.</p>	<p>Amend the entry-level shotgun firearms compulsory minimum training standards in order to improve the training provided to the industry. These changes are the result of the recommendation of the Private Security Services Advisory Board Training committee with the input of certified firearms instructors and interested members of the industry. have been amended. The amendments reflect an increase of 2 hours of training.</p> <p>A. Shotgun classroom training. Individual must first successfully complete entry-level or security officer handgun training. The entry level entry-level shotgun classroom instruction will emphasize but not be limited to:</p>

			<p>1. Safe and proper use and handling of shotgun; 2. Nomenclature; 3. Positions and combat loading techniques; 4. Decision making for the officer with the shotgun; 5. Transition from sidearm to shotgun; and 6. Shotgun retention and proper use of a sling.</p> <p><u>Total hours — 2 hours</u></p> <p><u>1. Shotgun handling techniques</u></p> <p><u>a. Identification of shotgun parts</u></p> <p><u>b. Slings – traditional sling, single point sling, 3 point sling</u></p> <p><u>c. Cruiser carry conditions</u></p> <p><u>d. Cruiser safe</u></p> <p><u>e. Chambering</u></p> <p><u>f. Reloading</u></p> <p><u>g. Transition from handgun to shotgun/shotgun to handgun (if applicable)</u></p> <p><u>h. Malfunctions</u></p> <p><u>(1) Immediate actions procedures</u></p> <p><u>(2) Remedial action</u></p> <p><u>i. Proper care and maintenance</u></p> <p><u>j. Shotgun retention</u></p> <p><u>k. Ammunition management and identification</u></p> <p><u>l. Range safety</u></p> <p><u>m. Dim light/low light</u></p> <p><u>2. Fundamentals of shotgun marksmanship</u></p> <p><u>a. Grip</u></p> <p><u>b. Stance (position)</u></p> <p><u>c. Sight alignment</u></p> <p><u>d. Sight picture</u></p> <p><u>e. Trigger control</u></p> <p><u>f. Breathing</u></p> <p><u>g. Follow through</u></p> <p><u>3. Written examination</u></p> <p><u>Total hours excluding examination (3 hours)</u></p>
6VAC20-171-380.		Entry level shotgun training.	<p>Amend the entry-level shotgun firearms range qualification requirements and course of fire in order to improve the training provided to the industry. These changes are the result of the recommendation of the Private Security Services Advisory Board Training committee with the input of certified firearms instructors and interested members of the industry. have been amended. The amendments reflect an increase of 2 hours of training.</p>

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

390.C3		handgun training	certified.
6VAC20-171-390.D2		Advanced handgun training	<p>Amend the 2nd paragraph, 1st and 5th sentence to insert numerical language for grammatical purpose.</p> <p>D. Course: Virginia Private Security Advanced Handgun Course of Fire.</p> <p>2. Stage Two: Turn-and-fire drill.</p> <p>All handguns are loaded with six <u>6</u> rounds of ammunition and safely holstered.</p> <p>Once facing the target and in a stable position, they must safely draw and fire two <u>2</u> rounds at the designated target circle.</p>
6VAC20-171-390.D3		Advanced handgun training	<p>Amend the 1st paragraph, and the 2nd paragraph, to replace with numerical language for grammatical purpose.</p> <p>3. Stage Three: Failure to stop drill. Stage three of the advanced handgun course of fire is held at a firing range and consists of failure to stop drills fired from the seven-yard <u>7-yard</u> line (straight draw hip holsters only).</p> <p>All handguns are loaded with six <u>6</u> rounds of ammunition and are safely holstered. Shooters are positioned with their backs to the targets, facing the instructor up-range. The instructor will command all shooters to walk at a normal pace, directly away from the target. Upon the command "fire," given at approximately the seven-yard <u>7-yard</u> line, each shooter must safely turn around while acquiring a firm grip on their weapon as performed in the previous drill. Once facing the target, the students will draw and fire two <u>2</u> rounds at the 8-inch body circle, and then one immediate round to the 4-inch head circle. The student will then safely reholster. The drill will be repeated three times.</p>
6VAC20-171-390.D4		Advanced handgun training	<p>Amend the last sentence in the 2nd paragraph to replace text with numerical language for grammatical purpose.</p> <p>4. Stage Four:</p> <p>Each two-round pair must be fired within four <u>4</u> seconds of the called command. Direction commands will be called at 3-5 yards, 5-7 yards, and then 8-10 yards.</p>
6VAC20-171-390.D5		Advanced handgun training	<p>Amend the last sentence in the 2nd and 3rd paragraph to replace text with numerical language for grammatical purpose.</p> <p>5. Stage Five: Judgmental shooting.</p> <p>There is a four-second <u>4-second</u> time limit at this</p>

			<p>stage for any "shoot" situation.</p> <p>If two targets are used, then the time limit is raised to six <u>6</u> seconds, regardless of whether two hostile targets are used or one hostile with one friendly.</p>
	<p><u>6VAC20-171-395.A</u></p>	<p><u>Entry-level patrol rifle training.</u></p>	<p>Insert new section establishing minimum firearms training standards and course of fire for patrol rifle. Patrol rifles are being utilized by security companies but are the only use of firearm not yet regulated. This training program will ensure a minimum qualification standard is met.</p> <p><u>6VAC20-171-395. Entry-level patrol rifle training.</u></p> <p><u>A. Patrol rifle classroom training. Individual must first successfully complete security officer handgun training. The entry-level patrol rifle classroom instruction will emphasize but not be limited to:</u></p> <ol style="list-style-type: none"> <u>1. Rifle handling techniques</u> <ol style="list-style-type: none"> <u>a. Nomenclature/identification of rifle parts</u> <u>b. Field stripping and reassembling</u> <u>c. Loading and unloading</u> <u>d. Chambering</u> <u>e. Reloading</u> <u>f. Slings</u> <ol style="list-style-type: none"> <u>(1) Traditional sling</u> <u>(2) Single point sling</u> <u>(3) 3-Point sling</u> <u>g. Transition from handgun to rifle/rifle to handgun</u> <u>h. Malfunctions</u> <u>i. Immediate actions procedures</u> <u>j. Remedial action</u> <u>k. Proper care and maintenance</u> <u>l. Rifle retention</u> <u>m. Ammunition management and identification</u> <u>n. Range safety</u> <ol style="list-style-type: none"> <u>o. Dim light/low light</u> <p><u>2. Fundamentals of rifle marksmanship</u></p> <ol style="list-style-type: none"> <u>a. Grip</u> <u>b. Stance (position)</u> <u>c. Sight alignment</u> <u>d. Sight picture</u> <u>e. Trigger control</u> <u>f. Breathing</u> <u>g. Follow through</u>

			<p><u>3. Zeroing iron sights</u></p> <p><u>a. Establishing mechanical zero</u></p> <p><u>b. Zeroing process</u></p> <p><u>4. Dim light shooting</u></p> <p><u>a. Hours of darkness/dim light</u></p> <p><u>b. Identification requirements</u></p> <p><u>c. Unaided reduced light shooting techniques</u></p> <p><u>d. Aided reduced light shooting techniques</u></p> <p><u>5. Shooting positions</u></p> <p><u>a. Fundamentals of shooting positions</u></p> <p><u>b. Basic patrol positions</u></p> <p><u>6. Use of force</u></p> <p><u>7. Criminal and civil liability</u></p> <p><u>8. Written comprehensive examination</u></p> <p><u>Total hours (excluding examination) 16 hours</u></p>
	<p><u>6VAC20-171-395.B</u></p>	<p><u>Entry-level patrol rifle training.</u></p>	<p>Insert new section establishing the range qualification and course of fire for patrol rifle. Patrol rifles are being utilized by security companies but are the only use of firearm not yet regulated. This training program will ensure a minimum qualification standard is met</p> <p><u>B. Range qualification (no minimum hours).</u> <u>The purpose of the range firing course is to provide practical patrol rifle training and qualification to those individuals who carry or have immediate access to a patrol rifle in the performance of their duties with the sighting system that will be carried on duty.</u></p>
	<p><u>6VAC20-171-395.C</u></p>	<p><u>Entry-level patrol rifle training.</u></p>	<p>Insert new section establishing the range qualification and course of fire for patrol rifle. Patrol rifles are being utilized by security companies but are the only use of firearm not yet regulated. This training program will ensure a minimum qualification standard is met</p> <p><u>C. Patrol rifle qualification course.</u></p> <p><u>1. All rifle qualification will be done with a law-enforcement type and caliber rifle. A total of 60 rounds of ammunition will be fired for rifle qualification.</u></p> <p><u>2. All rifle qualification firing will be done with iron sights. In addition, if an officer is using an optic while on duty, they must qualify with that optic.</u></p> <p><u>3. All indoor rifle qualification firing will be done at a range that accommodates a distance of 25 yards between the shooter and the target. No variances of this distance are allowed. The indoor target system will contain two targets per shooter</u></p>

		<p>mounted side by side. The targets will be FBI Q-R, half-sized silhouette targets. Use of this target type will simulate shooting at 50 yards.</p> <p>4. All outdoor rifle qualification firing will be done at 50 yards using the FBI Q silhouette full-sized targets. Two of these targets will be mounted side by side for each shooter.</p> <p>5. FBI Q silhouette targets are used for rifle qualification, scoring will be all hits inside the bottle – value 5 points; outside the bottle – value 0 points. With these targets a maximum score of 300 points is possible. Minimum qualification is 85% or 255 points.</p> <p><u>D. Patrol rifle course of fire.</u></p> <p>1. Prior to qualification, all shooters are required to fire a minimum of 30 familiarization rounds which will include transition drills from handgun to rifle and rifle to handgun. Shooters will fire a minimum of 10 rounds with a handgun. This exercise is not scored and the distance is at the discretion of the instructor.</p> <p>2. Stage 1; 50 yards/25 yards (indoors) – Shooters will load their rifle with a magazine of 20 rounds and place the selector on safe. From the standing position with the rifle in the sling carry position, on command the shooters will fire 5 rounds from the standing position, place the selector on safe, assume a kneeling position and fire 5 rounds, place the selector on safe shooter will assume the prone position, the shooter will fire 10 rounds. All 20 rounds of this stage will be fired at the left hand target. (1 minute) When firing is complete shooters will place the selector on safe and await further command.</p> <p>3. Stage 2; 25 yards – Shooters will load their rifle with a magazine of 15 rounds and place the selector on safe. From the standing position with the rifle in the sling carry position, on command the shooters will fire 5 rounds from the standing position, place the selector on safe, assume a kneeling position and fire 5 rounds, place the selector on safe shooter will assume the prone position, the shooter will fire 5 rounds. All 15 rounds of this stage will be fired at the right hand target. (45 seconds) When firing is complete shooters will place the selector on safe and await further command.</p> <p>4. Stage 3; 15 yards - On command shooters will assume the standing position and load rifle with a magazine of 10 rounds. On command shooters will fire 5 rounds at the right-hand target, place the selector on safe, assume the kneeling position and fire 5 rounds at the left-hand target in 15 seconds.</p>
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			<p><u>5. Stage 4; 7 yards - On command shooters will load rifle with a magazine of 20 rounds, selector in the safe position, and then place the rifle in the sling carry position. On command shooters will fire 2 rounds into the right target with a 2 second time limit. Upon completion of firing shooters will place the selector on safe and the rifle in the sling carry position. This exercise will be fired 5 times with a total of 10 rounds expended.</u></p> <p><u>6. Stage 5; 5 yards - On command shooters will load rifle with a magazine of 5 rounds, selector in the safe position, and then place the rifle in the sling carry position. On command shooters will fire 1 round into the left target head with a 2 second time limit. Upon completion of firing shooters will place the selector on safe and the rifle in the sling carry position. This exercise will be fired 5 times with a total of 5 rounds expended.</u></p>
	<u>6VAC20-171-395.C</u>	<u>Entry-level patrol rifle training.</u>	<p>Insert new section establishing the low light/dim light course of fire for patrol rifle. Patrol rifles are being utilized by security companies but are the only use of firearm not yet regulated. This training program will ensure a minimum qualification standard is met</p> <p><u>E. Low light/dim light qualification course of fire.</u> <u>7 yards - Under low-light conditions, on command shooters will fire 5 rounds at the left target, place the selector in the safe position, assume the kneeling position and fire 5 rounds at the right target. A time limit of 1 minute is allowed for this stage.</u></p>
6VAC20-171-400.		Firearms retraining.	Amend title to remove handgun/shotgun, firearms training also includes patrol rifle as well.
6VAC20-171-400.		Firearms retraining.	<p>Amend the subsection to incorporate the amendments to firearms training requirements and establish the retraining standards.</p> <p><u>A. All armed private security services business personnel with the exception of personal protection specialists, must satisfactorily complete two 4 hours of firearms classroom training or practical exercises and range training, and requalify as prescribed in paragraph B and C of section 6VAC20-171-370 6 VAC 20-171-376 for handgun. Firearms instructors who have received prior approval from the department may substitute the alternative course specified in 6VAC20-171-370.D and the low light course specified in Section 6 VAC20-171-370 C for re-qualification firing with a semi-automatic handgun, and 6VAC20-171-380 for</u></p>

			<p>shotgun, if applicable, on an annual basis prior to the issuance of the Firearms Endorsement, as follows:</p> <p>1. Classroom retraining or practical exercises—2 hours</p> <p>2. Range qualification with handgun and/or shotgun, if applicable (no minimum hours)</p> <p>Total hours (excluding range qualification)—2 hours</p>
6VAC20-171-400.	B	Firearms retraining.	<p>Amend the subsection to incorporate the amendments to firearms training requirements and establish the retraining standards.</p> <p><u>B. Re-qualification training with the shotgun shall be comprised of 3 hours of classroom training or practical exercises and range training and re-qualification firing as specified in 6 VAC20-171-380.B.</u></p>
6VAC20-171-400.		Firearms retraining.	<p>Amend the subsection to incorporate the amendments to firearms training requirements and establish the retraining standards.</p> <p><u>C. Re-qualification training with the patrol rifle shall be comprised of 4 hours of firearms classroom training or practical exercises and range training and re-qualification firing as specified in 6VAC20-171-395 for Patrol Rifle .</u></p>
6VAC20-171-400.		Firearms retraining.	<p>Amend the subsection to incorporate the amendments to firearms training requirements and establish the retraining standards.</p> <p><u>D. All applicable firearms retraining must be completed and documented with the department on an annual basis prior to the issuance of a firearms endorsement.</u></p>
6VAC201-171-420		Advanced handgun retraining	<p>Amend to read:</p> <p>All armed private security services business personnel registered in the category of personal protection specialist or other armed category seeking advanced handgun designation must satisfactorily complete advanced handgun retraining, which includes eight hours of firearms classroom training and range training, and requalify as prescribed in 6VAC20-171-390 C for handgun within the 12-month period immediately preceding the expiration date of his registration as follows:</p>
6VAC20-171-420.		Advanced handgun retraining.	<p>Delete specific content hours. This provides the training school and instructor with control of the content and hours required for each submitted objective within a total minimum 8 hour course.</p> <p>1. Legal authority and decision making —4 hours</p>

			2. Handgun safety, marksmanship and skill development —4 hours
Article 3 Security Canine Handler Training Requirements 6VAC20-171-430.		Entry level security canine handler training.	Delete entire article and section, the Security canine handler entry-level training has been moved to its appropriate section under 6VAC20-171-350 – Entry-level training for registered personnel.
6VAC20-171-440.		Security canine handler retraining.	Delete entire section, the Security canine handler in-service training has been moved to its appropriate section under 6VAC20-171-360 – In Service training for registered personnel.
6VAC20-171-445		Training Exemptions	Amend Article 4 to Article 3 and Insert <u>for entry-level training</u> after the word exemption in the last sentence.
6VAC20-171-460		In-Service training exemption	Strike the number 12 and insert the number 24. In order to properly list items 1-3, strike the word and from number 1 to number 2. Persons who have completed training which meets or exceeds the compulsory minimum training standards promulgated by the board for the in-service training required for the individual's particular category may be authorized credit for such training, provided the training has been completed within [12 <u>24</u>] months of the expiration date of the registration period during which in-service training is required. Such training must be provided by a third party organization category. Official documentation of the following must accompany the application for in-service training credit: 1. Information regarding the sponsoring organization, including documentation regarding the instructor for each session; [and] 2. An outline of the training session material, including the dates, times and specific subject matter [; <u>and</u>] 3. Proof of attendance and successful completion.
6VAC20-171-470		Prior firearms training exemption	Strike the word in-service after the word partial from the last sentence of the paragraph.
6VAC20-171-500B8		Disciplinary action; sanctions; publication of records.	Insert conditional agreements as an additional sanction to reflect the current policies and procedures utilized in the Department. B. <u>8. Conditional agreements.</u>
6VAC20-171-550		Appeals	Delete Agency mailing address
6VAC20-171-560		Court Review	Delete Agency mailing address
FORMS (6VAC20-		Forms	Amend section to include new and updated forms

171)			utilized in the regulation of Private Security Services
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Enter any other statement here