

# Guidance Document

To: Regulators & Other Members of the Public  
From: Virginia Board for Architects, Professional Engineers, Land Surveyors, Certified Interior Designers, and Landscape Architects (APELSCIDLA Board)  
Date: June 12, 2012  
Re: Comity Applicant Criteria of the Board's Current Regulations (eff. July 1, 2010)

---

## Purpose

The purpose of this document is to clarify the application requirements for those persons applying to the Board for licensure or certification via comity based on licensure or certification in a jurisdiction outside of Virginia.

## Architects

Applicants for architect licensure via comity must be currently licensed as an architect (and in good standing) in another jurisdiction of the United States or a province of Canada. Applicants without a NCARB certificate must meet (as of today) the Virginia licensing requirements that they would have needed to meet when they were first licensed as an architect by another jurisdiction of the United States or a province of Canada.

For example: John Smith was first licensed as an architect in Ohio on 11/17/1985. He is presently licensed in Texas and is in good standing. He is applying for a Virginia architect license via comity. The Board regulations in effect on 11/17/1985 (the date Mr. Smith was first licensed) were last updated 10/18/1985. Therefore, Mr. Smith must demonstrate that, as of today, he meets the requirements of the Board's regulations effective 10/18/1985.

Applicants for architect licensure via comity who hold a valid NCARB certificate, are currently licensed as an architect, and in good standing are not required to demonstrate they meet any other education, examination, or experience requirements of the Board's current regulations effective 7/1/2010.

Applicants who do not meet either of the above two circumstances must satisfy the initial licensing requirements of the Board's current regulations effective 7/1/2010. These requirements are the same requirements which first-time license applicants must meet.

## Professional Engineers (PE)

Applicants for PE licensure via comity must be currently licensed as a PE (and in good standing) in another jurisdiction of the United States. Applicants must successfully demonstrate that their first PE license was issued based on having met education, experience, and examination requirements which were substantially equivalent to Virginia's requirements at the same time of the applicant's original licensure. Additionally, comity applicants must submit three current references.

For example: Adam Jones was first licensed as a PE in Florida on 5/22/1994. He is presently licensed in California and is in good standing. He is applying for a Virginia PE license via comity. The Board regulations in effect on 5/22/1994 (the date Mr. Jones was first licensed) were last updated 5/19/1994. Therefore, Mr. Jones must demonstrate that when he was first licensed in Florida, he would have met the licensing requirements of the Board's regulations effective 5/19/1994. He must also submit three references.

If Mr. Jones cannot demonstrate that he met the Board's PE licensure requirements when he was first licensed in Florida on 5/22/1994, he must satisfy the initial licensing requirements of the Board's current regulations effective 7/1/2010. These requirements are the same requirements which first-time license applicants must meet.

## Land Surveyors

Applicants for land surveyor licensure via comity must be currently licensed as a land surveyor (and in good standing) in another jurisdiction of the United States. Applicants must successfully demonstrate that their first land surveyor license was issued based on having met education, experience, and examination requirements which were substantially equivalent to Virginia's requirements at the same time of the applicant's original licensure. Applicants must also pass the Virginia state-specific examination.

For example: Susan Johnson was first licensed as a land surveyor in North Carolina on 4/5/2001. She is presently licensed in Maryland and is in good standing. She is applying for a Virginia land surveyor license via comity. The Board regulations in effect on 4/5/2001 (the date Ms. Johnson was first licensed) were last updated 12/1/1999. Therefore, Ms. Johnson must demonstrate that when she was first licensed in NC, she would have met the requirements of the Board's regulations effective 12/1/1999. She is also required to pass the Virginia state-specific examination regardless of any other examinations she has completed.

If Ms. Johnson cannot demonstrate that she met the Board's land surveyor licensure requirements when she was first licensed in NC, she must satisfy the initial licensing requirements of the Board's current regulations effective 7/1/2010. These requirements are the same requirements which first-time license applicants must meet.

## Landscape Architects

Applicants for landscape architect licensure via comity must be currently licensed as a landscape architect (and in good standing) in another jurisdiction of the United States. Applicants must successfully demonstrate that their first landscape architect license was issued based on having met education, experience, and examination requirements which were not in conflict with, and at least as rigorous as, Virginia's statutory and regulatory requirements at the same time of the applicant's original licensure.

For example: Brad Moore was first licensed as a landscape architect in New Jersey on 8/14/2004. He is presently licensed in Massachusetts and is in good standing. He is applying for a Virginia landscape architect license via comity. The Board regulations in effect on 8/14/2004 (the date Mr. Moore was first licensed) were last updated 3/1/2002. Therefore, Mr. Moore must demonstrate that when he was first licensed in NJ, he would have met the requirements of the Board's regulations effective 3/1/2002.

Applicants for landscape architect licensure via comity who hold a valid CLARB certificate, are currently licensed as a landscape architect, and in good standing are not required to demonstrate they meet any other education, examination, or experience requirements of the Board's regulations.

If Mr. Moore cannot demonstrate that he met the Board's landscape architect licensure requirements on 8/14/2004, he must satisfy the initial licensing requirements of the Board's current regulations effective 7/1/2010. These requirements are the same requirements which first-time license applicants must meet.

## Interior Designers

Applicants for interior designer certification via comity must be currently licensed or certified as an interior designer (and in good standing) in another jurisdiction of the United States. Applicants must successfully demonstrate that their first interior designer license or certification was issued based on having met education, experience, and examination requirements which were equal to the Board's requirements at the same time of the applicant's original licensure or certification.

For example: Jane Smith was first licensed as an interior designer in New York on 12/4/2005. She is presently certified in Georgia and is in good standing. She is applying for Virginia interior designer certification via comity. The Board regulations in effect on 12/4/2005 (the date Ms. Smith was first licensed or certified) were last updated 12/1/2004. Therefore, Ms. Smith must demonstrate that when she was first licensed in New York, she would have met the requirements of the Board's regulations effective 12/1/2004.

If Ms. Smith cannot demonstrate that she met Virginia's interior designer certification requirements on 12/4/2005, she must satisfy the initial certification requirements of the Board's current regulations effective 7/1/2010. These requirements are the same requirements which first-time certification applicants must meet.

## Summary

Applicants for architect licensure via comity must either have a NCARB certificate or demonstrate that they meet (as of today) the Board requirements which were in effect when their first architect license was issued.

Applicants for PE, land surveyor, and landscape architect (without a CLARB certificate) licensure via comity must demonstrate that they would have met the Board's requirements had they applied in Virginia at the same point in time during which they were first licensed by a state other than Virginia. This means that all supporting documentation must clearly show that the experience, examination, and education requirements were satisfied *at the time* their first license was issued.

Applicants for interior designer certification by comity must demonstrate that they would have met the Board's requirements had they applied in Virginia at the same point in time during which they were first certified or licensed by a state other than Virginia. This means that all supporting documentation must clearly show that the experience, examination, and education requirements were satisfied *at the time* their first license or certification was issued.