



September 25, 2017

Keith Simila, PE  
Idaho Board of PE/PLS  
SENT VIA EMAIL

**RE: State of Idaho Review of Idaho Board of Licensure for Professional Engineers and Professional Land Surveyors.**

Dear Keith and Board:

This joint letter represents the opinions of ACEC Idaho, ISPE, and ISPLS regarding the state of the Idaho Board of Licensure for Professional Engineers and Professional Land Surveyors ("IBPEPLS" or "Board"). We hope it helps in the Governor's office review of the Board in terms of value to the professionals they help regulate and the citizens of Idaho.

Statements of opinion:

1. We are all for efficiency and costs savings when the public health, safety or welfare are not impacted. A review is a good idea to see if there are any opportunities in that regard. We applaud the executive branch in conducting this review for all professions.
2. PE/PLS are professions that demand rigorous licensure processes due to the nature of our work. The need is fully justified and has been set as a national and international standard.
3. ISPE, ISPLS, ACEC have worked closely with the IBPEPLS for decades to create laws and rules that best serve the public safety, health, and welfare and license holders. The population regulated by the Board is engaged with the Board continuously.
4. We believe the current Board, laws, and rules are operating well and don't believe any drastic changes are warranted.
5. We believe the Board should be its own entity and not part of the Bureau of Occupational Licensure. The nature of this practice necessitates its own Board.
6. We believe Certificates of Authorization are important so firms behave in accordance with rules that protect the public safety, health, and welfare.


7. We believe the fees and Continuing Professional Development requirements currently administered are reasonable and fair.
8. We believe the current Board make up is appropriate for regulating the industry and we believe the staffing level is also justified given the scope of necessary Board functions. We think it's also appropriate for the Executive Director to be a licensed professional engineer and/or land surveyor.
9. We are not in favor of any significant reduction in the requirements for licensure. Those requirements establish base competency levels and are important for interstate practice (professional comity). In fact, many believe base requirements for licensure should be raised due to increasing body of knowledge.
10. We are not in favor of any reduction in the requirements to maintain licensure. Some of the reasons are our obligation to protect the public safety, health, and welfare and comity issues.
11. We are in favor of the Board's continued monitoring of the practice and just administration of law and rule violations. In particular, we want rigorous review for determination of engineering practice and administration of practice overlap issues.

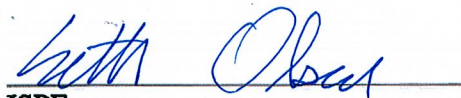
In summary, we do not believe the existence and operation of this Board is an undue burden on the past, current, or future employment of professional engineers and land surveyors in the State of Idaho. We recommend it remain intact and functioning as currently in statute. The work that professional engineers and professional land surveyors engage in directly impacts the public safety, health, and welfare in very significant ways. An independent licensing board is needed to ensure those professions are regulated to protect the citizens they serve.


We would like to review the results of the review and have the opportunity to provide input about any changes before they are made. We remain committed to work with the IBPEPLS to continue to work to improve efficiency of the system as opportunities arise in the future.

Thank you. If you have any questions, please contact any of the undersigned.

Sincerely,

  
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ACEC of Idaho

  
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ISPE

  
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ISPLS