



Papadopoulos, Emily B <emily.b.papadopoulos@wv.gov>

Comments to proposed rule changes

1 message

Patrick Rymer <prymer@mckinleydelivers.com>
To: "Emily.B.Papadopoulos@wv.gov" <Emily.B.Papadopoulos@wv.gov>

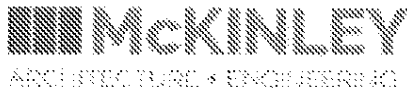
Fri, Jun 13, 2025 at 6:06 AM

Just a couple comments questions for the board:

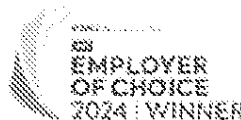
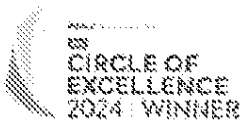
I believe the intent is to clarify that applying a date to the architect seal is optional under 9.6.2.2, but 9.6.3.3 seems to still require it with the word "and".

With the changes in 9.5.2, where now is guidance on what documents or submissions are required to be sealed?

Thanks for all your work.



PATRICK J RYMER, AIA, ALEP, NCARB
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Papadopoulos, Emily B <emily.b.papadopoulos@wv.gov>

Comments on proposed revised Rule

1 message

greg Williamson <gwilliamson2101@gmail.com>

Fri, Jun 13, 2025 at 11:27 AM

To: "Papadopoulos, Emily B" <Emily.B.Papadopoulos@wv.gov>

Emily...My comments on the proposed Legislative Rule are as follows:

2.7.7 The section adds the phrase "standard of care", which I also saw in a few other sections. I suggest that a definition be added in 2-1-2 for 'Standard of Care', unless it is already defined in the registration code/law.

5.2 The phrase "as a substitute for the section experience requirement if..." is confusing to me. Should this read "as a substitute for the this sections experience requirement" or is there a section of the Rule called Experience Requirement, in which case these two words should be capitalized?

6.2.2 The Board previously chose five years of practical experience over the newly inserted three years as non-NCARB certificate holders generally do not have an accredited degree in architecture. These additional two years were intended to supplement the applicant's knowledge that otherwise might have been received in an accredited program.

6.2.2 (2) Should the article "a" be stricken in the phrase "...direct supervision of ~~a~~ another registered..."

6.3 The new section 6.3 limits itself to reciprocal applicants under 6.1.1 and 6.1.2. Should it not also apply to reciprocal applicants under section 6.2?

8.4.5.c I do not understand the removal of this section. Does this mean that an out-of-state architect registered in multiple states (including WV) with differing continuing education requirements must meet WV's specific requirement regardless of what their home state may require? In my days on the Board, we intentionally avoided this as it can create a CEU management nightmare for many architects registered in multiple states. For instance, Florida requires 22 CEU hours (18 HSW) + a 2 hour mandatory Florida Building Code module to be completed in a 24 month period ending in even years (2026, 2028 etc.), while WV requires 12 health, safety, and welfare (HSW) CEU hours to be completed each year. For an architect registered in both states, but residing in Florida, they may choose to procrastinate in the odd ending year and obtain all CEU hours in the even ending year, which is perfectly acceptable in Florida. Florida does not require all hours to be HSW hours but WV requires all HSW (rightly so, in my opinion). In the past, the board has deemed meeting Florida's requirements as acceptable so long as Florida would accept meeting WV's requirement. For many busy architects, I think managing this could be a real headache. My recommendation is to at least discuss this section further and make certain this is what the Board really wants to do. Until the (glorious) day when all states and jurisdictions agree upon one continuing education requirement (which is unlikely to ever happen), I think the language in this existing section is important and necessary.

9.5.2.b The word 'such' was left in this phrase, but deleted in the similar phrase in 9.5.2.a. Was that intentional?

9.5.3 "A registered architect may include in technical submissions and may seal" ... This phrase seems incomplete to me. After the word include, should the phrase "their own work" or something like that be included?

9.6.2.2 Suggest changing "but a date is not required but may be applied" to "...application. Including a date is acceptable but not required."

Thanks for the opportunity to respond. Hope you and your family are all doing well.

Gregory A. Williamson
Williamson Architecture pllc
 45 Crystal Springs Drive
 Winfield, WV 25213
 304-807-0030



Papadopoulos, Emily B <emily.b.papadopoulos@wv.gov>

WV Arch Rule Changes

1 message

Chris Algmin <calgmin@pickeringusa.com>

Mon, Jun 16, 2025 at 12:09 PM

To: "Emily.B.Papadopoulos@wv.gov" <Emily.B.Papadopoulos@wv.gov>

I saw the changes to the seal requirements in 9.6.2.2. It seems more confusing now.

I'm concerned that "digital seal" and "digital signature" are not defined.

"A signature is required with the seal application..."

What is required of the signature?

Can an Architect use an image of an Architect's stamp with a signature and apply that as their seal to a drawing file?

Is an image of a signature a "digital signature"?

Is an image of a stamp a "digital signature"?

Do those need to be unique for each drawing set?

Is the change intended to match what is defined in WV 39A-3-1:

"(4) Digital signature consists of a message transformed using an asymmetric cryptosystem so that a person having the initial message and the signer's public key can accurately determine:

(A) Whether the transformed message was created using the private key that corresponds to the sender's public key; and,

(B) Whether the initial message has been altered since the message was transformed."

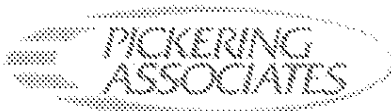
If so, do Architects have to submit the public key with the pdf when transmitted? Does the Public key need to be posted with a Certification Authority?

I want to comply with what is intended, but what is intended is not clear. What I see in the practice does not match the WV Code. Specific examples may help add clarity to the rules, or clearer definitions would also help.

Chris Algmin

Sent from my mobile device.

Chris Algmin, AIA, NCARB
Quality Manager
Principal Architect



Architects - Engineers - Surveyors

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6/16/25, 12:12 PM

State of West Virginia Mail - WV Arch Rule Changes

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Papadopoulos, Emily B <emily.b.papadopoulos@wv.gov>

RE: WV Arch Rule Changes

1 message

Chris Algmin <calgmin@pickeringusa.com>

Mon, Jul 7, 2025 at 9:38 AM

To: "Emily.B.Papadopoulos@wv.gov" <Emily.B.Papadopoulos@wv.gov>

I wanted to confirm you had received this comment on the revised Architect rules.

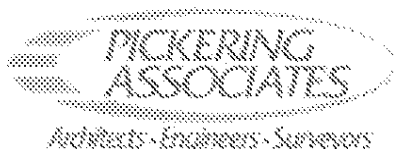
A condensed version of it for public use:

Please clarify the requirements of "Digital Signatures", verification requirements, and provide acceptable examples demonstrating their proper use.

Thank you,

Chris

Chris Algmin, AIA, NCARB
Quality Manager
Principal Architect



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Papadopoulos, Emily B <emily.b.papadopoulos@wv.gov>

Comments on Proposed Rules

1 message

Papadopoulos, Emily B <emily.b.papadopoulos@wv.gov>
To: Patrick Rymer <prymer@mckinleydelivers.com>
Cc: Emily B Papadopoulos <emily.b.papadopoulos@wv.gov>

Fri, Jul 11, 2025 at 1:10 PM

Dear Mr. Rymer:

Thank you for making comments on the proposed rule changes to the Board's registration rule. The Board appreciates you taking the time to review and comment on the draft rules. I apologize for my delayed response. As you know, registration renewals are during the month of June, so it has been really busy with renewals and the end of the fiscal year.

You were absolutely correct in noting that 9.6.2.3 references "and date" as if the date is required. Thanks for pointing that out. At the time the draft rules were posted, we were still conducting research on how other jurisdictions are dealing with this issue and also code officials' expectations and technical capacities. The Board has been looking at other jurisdictional rules in an attempt to make a change that is more "universal" instead of relying on a proprietary method of seal/signature security since this is a rapidly changing issue. The WVBOA Rules Committee wants the requirement to be flexible -- accounting for the technical savvy of some architects and the longevity and preference of others. Additionally, what we are considering for the revision will address the date issue.

Regarding your question about 9.5.2, please know the Board was attempting to make a very difficult passage of the rules easier for architects, code officials and the public to understand. I think by referencing the definition of "technical submissions," which is defined in W.Va. 30-12-2.8, I think we can further clarify what documents must be sealed.

More information will be available as we move forward and with a revised draft.

Thank you for your engagement and for commenting.

Sincerely,
Emily

Emily Papadopoulos

Executive Director

West Virginia Board of Architects

405 Capitol Street, Mezzanine Suite 3

Charleston, WV 25301

304-558-1406

Emily.B.Papadopoulos@wv.gov

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Papadopoulos, Emily B <emily.b.papadopoulos@wv.gov>

Comments on Proposed Rules

1 message

Papadopoulos, Emily B <emily.b.papadopoulos@wv.gov>
To: Chris Algin <calgin@pickeringusa.com>
Cc: Emily B Papadopoulos <emily.b.papadopoulos@wv.gov>

Fri, Jul 11, 2025 at 1:10 PM

Dear Mr. Algin:

Thank you for making comments on the proposed rule changes to the Board's registration rule. I apologize for my delayed response. As you know, registration renewals are during the month of June, so it has been really busy.

We are very appreciative of your comments (past and present) related to digital seals and signatures. All of those have been taken into account as the board has worked on its rule revisions. At the time the draft rules were posted, we were still conducting research on how other jurisdictions are dealing with this issue and also code officials' expectations and technical capacities. The Board has been looking at other jurisdictional rules in an attempt to make a change that is more "universal" instead of relying on a proprietary method of seal/signature security since this is a rapidly changing issue. The WVBOA Rules Committee wants the requirement to be flexible – accounting for the technical savvy of some architects and the longevity and preference of others.

Once a rule change is adopted, the board will provide acceptable examples demonstrating the proper use of signatures and seals on the website and in the newsletter.

More information will be available as we move forward with a revised draft.

Thank you for your engagement and counsel on this issue.

Sincerely,
Emily

Emily Papadopoulos

Executive Director

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Papadopoulos, Emily B <emily.b.papadopoulos@wv.gov>

Comments on Proposed Rules

1 message

Papadopoulos, Emily B <emily.b.papadopoulos@wv.gov>
To: greg Williamson <gwilliamson2101@gmail.com>
Cc: Emily B Papadopoulos <emily.b.papadopoulos@wv.gov>

Fri, Jul 11, 2025 at 1:16 PM

Dear Greg:

Thank you for making comments on the proposed rule changes to the Board's registration rule. The Board appreciates you taking the time to review and comment on the draft rules. I apologize for my delayed response. As you know, registration renewals are during the month of June, so it has been really busy with renewals and the end of the fiscal year. We are very appreciative of your keen eye, historical perspective, and interest in making the rules better understood by the public, architects, and code officials.

I will be meeting with the Rules Committee to discuss your comments and those of others, but wanted to give you a little feedback and invite you to make further review as we have a revised draft available.

2.7.27

I agree that a definition of "Standard of Care" is a good idea and will provide a draft of one for board review.

5.2.

There is a superfluous word in the first sentence, and you found it. It is the word "section," which should have been part of the strike-through.

6.2.2

The Board is considering this change because architects without an accredited degree have been eligible to acquire the NCARB certificate after three years of experience. At the most recent NCARB Annual Business Meeting, a resolution passed that would eliminate the three years of experience following registration in a jurisdiction for architects who complete one of the two education alternatives and are seeking a NCARB certificate. The current thinking of the Board is that three years of experience following registration following AXP is enough to demonstrate competency. Further, with the new path to reciprocity for West Virginia residents with no experience required created by the passage of SB 458, the Board believes that making the change now from five years of experience following registration in another jurisdiction to three is appropriate for reciprocal applicants who are non-NCARB certificate holders. You are also absolutely correct that there was an extra "a" in the next to the last line of this section before the word "another." This will be removed.

6.3.

We are going to have this reviewed by the attorney again, but I think this section is okay because it is referring only to the subsections 6.1.1 and 6.1.2 rather than "NCARB Certificate Holders."

8.4.5.c.

I discussed this section with a Board member after receiving your comments, and we'll discuss this at our upcoming meeting when we seek approval of the Agency Approved Rules. I was informed that West Virginia was an early adopter of CE requirements when some states didn't have them. Pennsylvania just finally passed a CE requirement last year. Leadership on this issue from

NCARB might make a rule like 8.4.5.c. easier to administer, and elimination of rules that are difficult to administer was one of the charges of the Governor's Executive Order. Also, previously, as you know, the Board was on the "horror system" regarding CE. Now with the adoption of new technology, we have the ability to have registrants demonstrate that they have met the annual CE requirement in 8.4.1, and the submissions are easily audited.

9.5.2.b.

I am in agreement that "such" should likely stay in 9.5.2.a and b since it references "a registered architect" in the section above it.

9.5.3

We are revising this for clarification.

9.6.2.2.

Thanks for the recommended wording. We have received some other comments related to digital seals and signatures and have been looking at other states' rules to find some language that the Board hopes could be "universal" and also flexible enough to accommodate the wide range of technical capacity among architects and code officials while also being straightforward and clear.

Let me know if you are interested in seeing a revised draft the Board will be considering for its Agency Approved Rules. I remain very grateful for your input, expertise, and generosity in trying to serve the public.

Hoping you had a wonderful July 4th holiday weekend and will enjoy the upcoming weekend!

Thanks again for your review and engagement.

Sincerely,
Emily

Emily Papadopoulos

Executive Director

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Emily.B.Papadopoulos@wv.gov

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Papadopoulos, Emily B <emily.b.papadopoulos@wv.gov>

RE: Comments on Proposed Rules

1 message

Chris Algmin <calgmin@pickeringusa.com>

Fri, Jul 11, 2025 at 2:23 PM

To: "Papadopoulos, Emily B" <emily.b.papadopoulos@wv.gov>

Cc: Antonia Edwardson <antonia@aiawv.org>

I appreciate the feedback. Acceptable examples will be very beneficial in understanding the intent.

CC'ing Antonia with AIAWV so she can see the response. I had sent my comment for AIA's awareness, too.

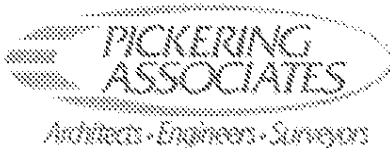
I appreciate all you do! Have a great weekend.

Chris

Chris Algmin, AIA, NCARB

Quality Manager

Principal Architect



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From: Papadopoulos, Emily B <emily.b.papadopoulos@wv.gov>
Sent: Friday, July 11, 2025 1:11 PM
To: Chris Algin <calgin@pickeringusa.com>
Cc: Emily B Papadopoulos <emily.b.papadopoulos@wv.gov>
Subject: Comments on Proposed Rules

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Dear Mr. Algin:

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Sincerely,

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Papadopoulos, Emily B <emily.b.papadopoulos@wv.gov>

Re: Comments on Proposed Rules

1 message

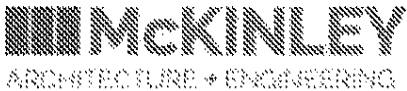
Patrick Rymer <prymer@mckinleydelivers.com>
To: Emily B Papadopoulos <emily.b.papadopoulos@wv.gov>

Fri, Jul 11, 2025 at 2:51 PM

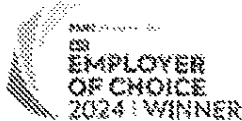
No problem, thanks for the clarification, and all the work you and the Board do for our profession.

BTW I appreciate the flexibility as I do prefer keeping my "digital" seal and signature under my control and affixing a date as another layer of control. I'm also helping our organization navigate the different sealing customs and traditions and rules of various states, which can be confusing. So I truly appreciate your efforts. Also, the donut hole where all technical submissions are required to be sealed by architects but the engineering practice law that only final documents are sealed creates some issues in submissions with various A/E professionals contributing.

If I can be a resource in sharing any knowledge and research in this area, feel free to reach out.



PATRICK J RYMER, AIA, ALEP, NCARB
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On Jul 11, 2025, at 1:10 PM, Papadopoulos, Emily B <emily.b.papadopoulos@wv.gov> wrote:

Dear Mr. Rymer:

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Sincerely,
Emily

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