

>>> H. Scott Laird URSCorp. 4/1/2011 1:35 PM >>>

Dear Karen,

I offer the following comments on the questionnaire as constructive feedback for consideration by the LSRP Licensing Board. I appreciate the opportunity to participate.

Questionnaire Section B.

In questions B6,9, and 10, the word "ever" places an unnecessary burden on the respondent because, after the initial audit, it would require the respondent to re-evaluate work that has already been audited previously. I strongly recommend that the question state more clearly the (narrower) period covered by the audit. For example, "If this is your first audit, for the applicable period since the date you received your LSRP license, have you...etc", ... and "If you have been previously audited, since the date of your previous audit, have you...." etc.

Question B15 - I find this question to be confusing because "known" discharges can be understood to mean different things depending on the situation. A known discharge can be one in which it has already been reported by others to the state and has an existing case number, as well as a discharge that was recently discovered and had not been reported. I believe the former is not the intent of the question or Section 16k.

Questions B15,16,17,18, and 20. My comment relates to my uncertainty as to intended meaning of "NA" and the necessity to provide an explanation. For instance, in question 15, if a known discharge exists at a site and had been already reported by others to the Hotline and a case number exists, the LSRP needn't re-report it. Therefore, the answer should not be "No" but "NA". Why is an explanation of a response of "NA" necessary? Note that in Question 20, no such response is asked for. Please clarify the potential confusion between a response that appears to be a contravention of the statutory requirement versus a "Not Applicable" response, and don't require an explanation of NA unless you specify the condition that would indeed warrant one. As currently worded, the respondent is needlessly burdened with preparing explanations that aren't really warranted.

Questionnaire: Update of Previous Submissions Concerning your LSRP License

Please identify the relevant information sections of the LSRP application that could need updating. I suggest that an edited version of that section(s) be included in the questionnaire (if feasible) and submitted so that the information can be accurately entered in the Board's database. Does the LSRP need to submit this information separately to NJDEP?

Questionnaire Section C.

If the LSRP has another current professional license (e.g., P.G./P.E.), it is likely that it already requires 24 professional development hours biannually. I recommend that the Board allow Continuing Education PDHs or CEUs required to be obtained for another professional license as satisfying the continuing education requirement for LSRPs, and that they only need to submit proof of a current license.

Questionnaire Section D.

The SRRA requires that references be provided as a condition of being issued an LSRP license. However, to my reading, this is not explicitly required by SRRA and should be eliminated from the audit questionnaire. Moreover, it is not standard practice of other professional licensing boards to require references as part of the audit or license renewal process.

I hope you find these comments beneficial. Thank you again for the opportunity to participate.

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"A problem can't be solved at the same level of awareness which created it. / Imagination is more important than knowledge." -- Albert Einstein

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