



**National Society of  
Professional Engineers®**

October 18, 2013

Kimberly A. Holden  
Deputy Associate Director, Recruitment and Hiring  
U.S. Office of Personnel Management  
1900 E Street, NW  
Washington, DC 20415-1000

Dear Ms. Holden,

On behalf of the more than 35,000 members of the National Society of Professional Engineers (NSPE), I would like to comment on the proposed draft revision to the qualification standard for professional engineering positions, 0800, that would add ABET-accredited engineering technology bachelor degrees as qualifying for professional engineering occupations.

As you may know, NSPE is the national society of licensed professional engineers from all engineering disciplines that promotes ethical and competent practice, advocates licensure, and enhances the image and well-being of its members. Founded in 1934, NSPE serves more than 35,000 members and the public through 53 state and territorial societies and more than 400 chapters.

While we greatly value the important role of the engineering technologists as part of the engineering team, the “professional engineer” is a protected term in all 50 states. To qualify as a professional engineer (PE) in most states, one must earn a four-year bachelor's degree in engineering from an ABET-accredited program, pass both the Fundamentals of Engineering (FE) and Principles and Practice (PPE) examinations as prepared and administered by the National Council of Examiners for Engineering and Surveying (NCEES), and obtain at least four years of professional experience. In addition, over forty states have now established mandatory continuing education requirements for professional engineer licensure renewal.

The existing individual occupational requirements for a professional engineering position in the federal government do not meet these requirements. In fact, in certain instances, the federal government considers education alone a sufficient qualification for professional engineer status. By revising the qualification standards to require only a bachelor's degree in engineering technology, OPM will be further eroding basic and long-established standards for the professional engineering practice.

Licensed professional engineers have always and continue to play a critically important role in designing innovative solutions to societal challenges and in protecting the public health, safety and welfare. At a time when the federal government is seeking to promote broad economic prosperity and to enhance our national security, all federal agencies must show leadership and establish and



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maintain high engineering qualifications and standards for employees in the federal workforce

NSPE strongly urges the OPM to instead revise the qualification standard for professional engineering positions to require a PE for professional engineering occupations. NSPE and OPM share a common mission to ensure that our engineers' foremost priority is to protect the public health, safety, and welfare. A PE's rigorous training and demonstrated expertise is a prerequisite to meeting this goal.

We appreciate the opportunity to provide this comment. Should you have any questions, comments, or concerns regarding this issue, please feel free to contact NSPE Manager of Government Relations Arielle Eiser at 703-684-2844 or [aeiser@nspe.org](mailto:aeiser@nspe.org).

Sincerely,

Robert A. Green, P.E., F.NSPE  
President  
NSPE