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**HB 2265 Department of Criminal Justice Services; photo identification.** Provides that the Department of Criminal Justice Services shall cause to be issued, to every person who is issued a private security services registration by the Department, a plastic photo identification card containing the name, registration number, registration category, and photograph of the person; the date the card was issued; the card's expiration date; and "Department of Criminal Justice Services, Commonwealth of Virginia."

**POSITION: PIAVA URGES YOUR SUPPORT FOR HB 2265**

**COMMENTARY:** Due to the nature of services performed by a Private Investigator, they at times come in contact with law enforcement personnel and/or are in direct contact with members of the public, often times in or around their private residences and/or place of business. The **Private Investigator's Association of Virginia, Inc. (PIAVA)** believes strongly that both law enforcement personnel and/or citizens of the Commonwealth at times experience a legitimate need for a timely, practical and reasonably effective means to validate the identity and authorization of an individual to perform private investigative services. Such circumstances require ***immediate access to an identification issued by DCJS, which demonstrates on its face, whether its bearer has been authorized to perform regulated services.*** Critical components of that identification include the name, photograph, and key descriptive data of the registrant which are sufficient to permit a reviewer to establish whether it is applicable.

Creating a statutory requirement for the Department of Criminal Justice Services (DCJS) to issue a photo identification card to its registrants requires that the agency return to its past policy and practice of doing so. (Note: DCJS changed its past practice with the promulgation of a new regulation in 2012, which removed photos from its issued identification cards). Various private security industries regulated by DCJS, including the private investigative industry, have advised that a DCJS registration card must bear a photo of a registrant to assure that law enforcement and/or the general public have an effective means to validate the identity of a registrant and his authorization to perform private security services. In that regard, PIAVA believes that the absence of a photo on the current registration card issued by DCJS creates a public safety issue which warrants immediate resolution. After a review of current DCJS policy and practice in the issuance of registration cards, the Private Security Services Advisory Board concurred on January 19, 2015 with the opinion voiced by PIAVA and other segments of the private security on the issue, and voted unanimously to support HB 2265.

Enactment of HB 2265 as passed by the House will be cost neutral as DCJS is authorized by Virginia Code to "Levy and collect fees for registration...that are sufficient to cover all expenses for administration and operation of a program of registration...for private security services..." (see §9.1-141.C.5. of Virginia Code). To that end, the bill includes a \$4 surcharge to defer upfront costs associated with the issuance of the card. PIAVA urges your support for HB 2265.