

Control Systems Information

The following article was printed in the Board's May 2007 newsletter and is also posted on the Web site. The article prompted questions that were discussed by Board members in June 2007 and are answered here.

In recent months, questions have been raised with the Board regarding licensure and registration requirements for control systems design and systems integration activities. The Board has determined that designing control systems is considered the practice of engineering and requires professional engineer licensure. Assembling or constructing control systems from an engineer's design is not considered to be the practice of engineering.

Companies that provide systems integration services that include the design of control systems and selection of system components are considered to be providing engineering services and must have a Certificate of Authorization from the Board. Therefore, those firms must also have licensed engineers who are in responsible charge of that work.

Follow-up questions and answers:

Does the Board's decision affect individuals as well as firms?

Individuals designing control systems to include selection of system components must be licensed engineers. An individual practicing as a sole proprietor, under his or her own name, does not require a COA.

Is all control systems work under this blanket?

Designing control systems to include selection of system components requires licensure. A COA (Certificate of Authorization, or firm license) is also required if the practice is within a firm.

Does this apply to Original Equipment Manufacturers (OEMs) for their own equipment? Control systems components design by an equipment manufacturer does not require a licensed engineer or a COA when that component is supplied to be used in a system. In the system, that equipment and its controls will usually interface with other equipment and an overall controls system and strategy. The overall system design does fall under this requirement. If the OEM is providing the overall system to the end user, they would be required to have a licensed engineer and a COA.

Will all systems integrators now be required to have a Control Systems PE (CSE) on staff?

South Carolina does not issue licenses by discipline. Licensed engineers are prohibited from providing services that are outside of their areas of expertise. As an example, a licensed engineer with an electrical engineering background and with experience and expertise in control systems should be qualified to provide control systems design services. It is the responsibility of the licensed engineer to provide services only in areas where he or she believes they are qualified to do so. Therefore, the answer is that systems integrators do need licensed engineers, qualified to provide control systems design, on their staff.

Board decision, June 2007