

Department of Licensing and Regulatory Affairs  
Bureau of Professional Licensing– Boards and Committees Section  
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Attention: Policy Analyst      Email: BPL-BoardSupport@michigan.gov

**In Re Proposed changes to rules for Professional Engineers in Michigan - Section 1.**

To: Michigan Board of Professional Engineers

1. Objection is made to the removal of current Rule 1 (1)( c) that defines Distance Learning, and objection is made to the deletion of Distance Learning Courses from Rule 41(2)( c). Since in today’s world significant use of Distance Learning is common, continuing to include its definition will maintain clarity of what is commonly used to effect CE requirements Proposed Rule 41 (1)( c) should be augmented explicitly to include Distance Learning Courses related to engineering. Proposed Rule 4 (1)(a) includes courses approved for CE credit by “Another state’s board of engineers.” Some of those courses use distance learning, so including distance learning in proposed rule (1)( c) adds clarity.

It is proposed that current Rule 1(1)( c) be retained in the new rules and that the content of proposed Rule 41 (1)( c) be augmented to read as follows:

Rule 41 (1)( c) Attending a seminar, in-house or distance-learning course, workshop, or professional or technical presentation related to engineering.

2. Objection is made to the last sentence in old Rule 1 (1)(b) [proposed Rule 1 (1)(d)]. One teaching an engineering course that would provide a student with CE credit should receive credit even if the teacher receives compensation for teaching. This is grossly inequitable. How an applicant for renewal is compensated is independent from whether the applicant has satisfied CE requirements.

It is proposed that the last sentence of current Rule 1 (1)(b) - proposed Rule 1 (1)(d) - be stricken so that the rule is this:

~~(b)~~ (d) "Course" means any qualifying activity with a clear purpose and objective that will maintain, improve, or expand the skills and knowledge relevant to the licensee's area of professional practice.

The PE Board and its staff are thanked for formal consideration of the above.

Sincerely, James C. Mc Laughlin; PE, JD Associate Counsel for Kettering University

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