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STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
LANSING

ORLENE HAWKS
DIRECTOR

Memorandum

VIA E-MAIL

DATE: August 11, 2020

TO: Senator Peter Lucido, Chairperson, JCAR
Representative Matt Maddock, Alternate Chairperson, JCAR
Evan Keimach, Senate Majority Policy Office
Jimmy Biehl, House Republican Policy Office
Tim Reeves, Counsel, JCAR
Elizabeth Edberg, Counsel, JCAR

FROM: Marlon I. Brown, Director of Policy and Legislative Affairs *MB*

SUBJECT: Joint Committee on Administrative Rules (JCAR) Briefing Memo for Rule Set 2019-103 LR Sanitarians Registration – General Rules

Rules Primer

The rules revise the definitions of terms and the education, experience, and examination requirements that must be satisfied to receive a sanitarians registration. In addition, clarification of the requirements for re-registration and renewal were necessary.

Summary of the Final Proposed Rule

The proposed rules address the following items:

- Clarify definitions and the meaning of terms used in the rules.
- Update environmental health baccalaureate programs accreditation standards.
- Update environmental health graduate programs accreditation standards.
- Update higher institution educational program regional accreditation standards.
- Move educational requirements from the definitions to a rule in the educational section.
- Require applicants, who are graduates of programs that are only regionally accredited, to provide an evaluation of their educational credentials by a credential evaluation organization to the department.

- Revise the human trafficking rule to include a date of promulgation.
- Remove duplicative language from the former examination rule.
- Clarify and simplify registration by examination requirements, including the removal of departmental review of an alternative educational and training program.
- Add criteria related to good moral character and fingerprinting as conditions for re-registration of a sanitarian, as well as other relevant criteria, depending on the circumstances of the applicant.
- Add a rule that addresses the requirements for registration renewal.

Stakeholder Engagement

Development of the proposed rules occurred in consultation with members of the Sanitarian profession via a rules work group, which included representatives of the Michigan Association of Local Environmental Health Administrators (MALEHA) and the Michigan Environmental Health Association (MEHA). The web address for the work group minutes is https://www.michigan.gov/lara/0,4601,7-154-89334_72600_72603_27529_27553_91481-501188--,00.html.

Public Engagement and Public Hearing/Comment/Information

The public comment period for this rule set began on May 5, 2020 and ended at 5:00 p.m. on May 22, 2020. The notice of public comment period was published in various newspapers, as required, posted on the LARA website, and distributed via email listserv to all interested parties. The public hearing was held on May 22, 2020 at 9:00 a.m., and occurred virtually via Zoom, as permitted under Executive Order 2020-75. Two attendees spoke on the rules at the public hearing and three persons submitted written comments.

Modifications Made Due to Public Comment

There were no changes made to the proposed rules based on comments received during the public comment period.

Significant Issues Not Incorporated in the Final Proposed Rules

No significant issues were raised during the public comment period. Questions were related to the applicability of updated educational standards for initial registrations and registrations that have lapsed for more than three years. There is no impact on renewals for current registrants. In addition, there is no expected impact on other state acts, rules, or guidance documents that adopt and/or use the Registered Sanitarian credential within them.

These rules do not address a request for a longer registration cycle and/or a longer period for re-registration. Further, they do not address a request for incorporating

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continuing education under the Sanitarians Part 184 of the Public Health Code as there was not broad support for this action.

cc/att: Orlene Hawks, Director, LARA
 Kim Gaedeke, Chief Deputy Director, LARA
 Adam Sandoval, Deputy Director, LARA
 Debra Gagliardi, BPL Bureau Director, LARA
 Elizabeth Arasim, Regulatory Affairs Officer, LARA