FAQs for Implicit Bias Training

March 23, 2023

What is Implicit Bias Training?

A: The requirement for Implicit Bias Training was added to the Public Health Code – General Rules in 2021 per Executive Directive 2020-07. The rule was subsequently updated in March 2023. The rule defines implicit bias as "an attitude or internalized stereotype that affects an individual's perception, action, or decision making in an unconscious manner and often contributes to unequal treatment of people based on race, ethnicity, nationality, gender, gender identity, sexual orientation, religion, socioeconomic status, age, disability, or other characteristic. (Rule 338.7001(c))

Training on Implicit Bias is required as a condition for initial licensure or registration as well as license or registration renewal. Unlike the human trafficking training requirement, this is not a "one time" training. Implicit Bias training is required every time you renew your license.

What professions need to comply with this rule regarding Implicit Bias Training?

A: All professions licensed or registered under the Michigan Public Health Code, except for Veterinary Medicine, are required to take Implicit Bias training. This includes the following:

- Acupuncture
- Athletic Trainers
- Audiologists
- Behavior Analysts
- Chiropractors
- Counselors
- Dentistry
- Genetic Counseling
- Marriage & Family Therapy
- Massage Therapy
- Medicine
- Midwifery
- Nursing
- Nursing Home Administrators
- Occupational Therapy
- Optometry
- Osteopathic Medicine & Surgery
- Pharmacy (Pharmacists, Pharmacy Technicians, etc.)
- Physical Therapy
- Physician's Assistants
- Podiatric Medicine & Surgery
- Psychology
- Respiratory Therapy
- Sanitarian
- Social Worker
- Speech-Language Pathology

When did this requirement begin?

A: The requirement took effect on June 1, 2022, which was one year after the promulgation of the rule. If the 90-day renewal window for your license or registration spanned across June 1, 2022, the training is not required if you renewed prior to June 1, 2022. However, if you choose to renew on or after June 1, 2022, the training was required.

Also, the training is required for all new applications for licensure or registration received on or after June 1, 2022.

How many hours of training do I need?

A: **New Applicants** for licensure or registration are required to have completed 2 hours of implicit bias training within the 5 years immediately preceding issuance of the license or registration.

Renewing licensees and registrants are required to complete 1 hour of implicit bias training for each year of their license or registration cycle. However, for ***initial*** renewal after June 1, 2021, licensees will only need to have 1 hour for each year since the rule's promulgation date of June 1, 2021.

For example, if you are scheduled to renew your license in August of 2022, you would only be required to have 1 hour of training, even if the length of your license was 3 years. If permitted by the Public Health Code and rules for your profession, this training may be used to satisfy other training or continuing education requirements.

Subsequent renewals will require 1 hour of implicit bias training for each year of the license or registration cycle.

Who can provide training?

A: The rule provides a detailed description of what the training should cover and who is an acceptable sponsor of the training. Any training that meets the requirements of the rule is acceptable. Please note the Department does not pre-approve these training programs. We recommend that applicants refer to the standards that have been established in rule for guidance on what is acceptable.

The rule also requires licensees to retain documentation of meeting the requirements of this rule for a period of 6 years from the date of applying for licensure, registration, or renewal.

If I took training that qualifies before June 1, 2021, can I count this training at my next renewal?

A: Training that was taken prior the promulgation of the rule (June 1, 2021) and within the license cycle that is up for renewal, qualifies toward the requirement for renewals. However, the rule allows new applicants for licensure or registration to complete the training within the 5 years immediately preceding issuance of the license or registration.

If I am required to have 3 hours of training to renew my 3-year license, can I take one three-hour class or do have to take 1 hour of training each year?

A: In this example you could take a single three-hour class to meet the training requirement. The rule does not require one hour IN each year of the license cycle only one hour FOR each year of the license or registration cycle.

What methods can be used to complete the training?

A: The rule was revised in 2023 to allow for more ways for licensees to take the training. Rule 338.7004(3)(d) now states the following:

> *(d) Acceptable modalities of training include any of the following:*
> *(i) A teleconference or webinar that allows live synchronous interaction that provides for the opportunity for participants to interact with the instructor and other participants.*
> *(ii) A live presentation that provides for the opportunity for participants to interact with the instructor and other participants.*
> *(iii) An asynchronous teleconference or webinar.*

How will the implicit bias training requirement be enforced?

A: At time of application and renewal an applicant, licensee or registrant will attest to compliance with the rule. Rule 338.7004(4) provides the following:

> The department may select and audit a sample of a licensees or registrants and request documentation of proof of compliance with this rule. If audited by the department, a licensee or registrant shall provide the proof of completion of training, including either of the following:
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> *(a) A completion certificate issued by the training program that includes the date of the training, the program sponsor's name, the title of the program, and licensee's or registrant's name.*
>
> *(b) A self-attestation by the licensee or registrant that includes the date of the training, the program sponsor's name, the title of the program, and licensee's or registrant's name.*