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DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
LANSING

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DIRECTOR

**MICHIGAN BOARD OF PROFESSIONAL ENGINEERS
RULES COMMITTEE WORK GROUP
MEETING**

**MINUTES
NOVEMBER 15, 2019**

The Michigan Board of Professional Engineers Rules Committee Work Group, met on November 15, 2019, at 611 West Ottawa Street, Upper Level Conference Center Room 5, Lansing, Michigan 48933.

CALL TO ORDER

Weston MacIntosh, Analyst, Boards and Committees Section, called the meeting to order at 9:04 a.m.

ATTENDANCE

Members Present: Kelly Fedele, Professional Engineer
Lori Fobes, Professional Engineer
Charles Hookham, Professional Engineer
James Stevens, Professional Engineer

Members Absent: None

Staff Present: Weston MacIntosh, Analyst, Boards and Committees Section
Rich Roselle, Analyst, Licensing Division
Stephanie Wysack, Board Support, Boards and Committees Section

Public Present: James C. McLaughlin – Kettering University
Thomas C. Wheat, PE – Michigan Society of Professional Engineers
Robert Wheeler – Michigan Society of Professional Engineers

WELCOME

MacIntosh explained that the purpose of this meeting is to discuss only the public comments received during the open comment period and those made at the Public Hearing that was held on October 4, 2019.

RULES DISCUSSION – Public Hearing Comments (Copy of Draft Rules and Comments attached.)

In Re Proposed rule changes for Professional Engineers – objections to portions of the Regulatory Impact Statement & Cost-Benefit Analysis (RIS) transmitted to The Michigan Office of Administrative Hearings and Rules in August 2019.

MacIntosh stated this was not related to the rules and would not be covered.

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

R 339.16001 Definitions.

Subrule (1): MacIntosh read the public comment about removing the definition of distance learning.

Stevens stated that there is no need to distinguish separately as that is widespread practice.

Fobes and Fedele agreed with Stevens.

McLaughlin stated that removing the definition will cause problems with the audit process.

Roselle stated that removing the definition allows for a broader interpretation in the audit process.

R 339.16041 Acceptable continuing education; limitations.

Subrule (1)(c): MacIntosh read the public comment (1) about adding distance learning to this subrule. MacIntosh stated that there is currently no distinction about distance learning and removing the word “professional.”

Roselle stated that using the term “professional” defaults to the definition that is provided in statute.

Hookham stated that it would be difficult to create a definition that is broad enough to work for everyone.

Fedele agreed. It is up to the individual to determine if the course they are taking is specific to the area that they specialize in.

Hookham would like information from the audit team about any difficulty they have in identifying continuing education as “professional engineering.” MacIntosh will follow up with audit team.

Stevens pointed out that there have been no regulatory cases that have come before the Board during his term that have been related to the inability to find continuing education as acceptable as “professional engineering.”

R 339.16001 Definitions

Subrule (1)(d): MacIntosh read public comment (2) about receiving compensation for teaching and not being given credit for continuing education.

Fedele stated that an individual is not learning anything by teaching the same course repeatedly.

Hookham stated that continuing education is something that is earned beyond what the individual is teaching.

Stevens agrees with Fedele and Hookham.

Wheeler stated that core classes are settled classes, but new areas of study should be allowed as continuing education. MacIntosh stated that those classes are covered under R 339.16041(1)(d).

Fobes stated that there would be redundancy teaching the same class repeatedly.

Roselle stated that there is a limit on the amount of continuing education granted under R 339.16041(1)(d) which does not address the compensation comment for R 339.16001 (1)(d).

Stevens agreed with removing the compensation sentence in subrule (1)(d).

Fedele and Fobes agreed to removing the compensation sentence.

In Re Proposed changes to rules for Professional Engineers in Michigan.

R 339.16041 Acceptable continuing education; limitations.

MacIntosh read the public comment (1) about the disadvantage of the continuing education requirement for individuals who are more specialized and teaching/consulting.

Subrule (1)(d): Fobes stated that this subrule allows for teaching a course one time.

Stevens stated the subrule should remain as written.

Fobes stated that credit is given only for teaching the course, not the prep work involved. Prep work could be different for everyone, even if teaching the same course.

McLaughlin stated that the rule is narrow in its limitation, therefore too narrow for specialized engineers.

Fobes stated that credit can be obtained for other works under subrule (1)(e).

The Rules Committee did not agree to the requested change.

MacIntosh read public comment (2) about adding a subrule (1)(j) to allow for continuing education credit for membership in an engineering society and how much credit should be given.

Fobes stated that 20 hours of credit is too much for holding membership in an engineering society.

Fedele agreed with Fobes.

Hookham also agreed with Fobes. He stated that there would be no way to create a list that was inclusive. Activities done within engineering societies are covered under other activities within subrule (1).

McLaughlin stated that the paper/article comment was meant to mean reading, not writing along with a summary of the reading.

The Rules Committee did not agree to add a new subrule.

Subrule (1)(h): MacIntosh read the public comment about advising/mentoring thesis projects.

Hookham stated that an advisor/mentor is not learning anything new, as the individual should already have the knowledge to work in that role.

Stevens agreed with Hookham. He stated that there are organizations that have formal mentoring programs that focus solely on mentoring, not practice in the field.

Fedele and Fobes both agreed with Hookham.

Subrule (1)(c): MacIntosh read the public comment about including distance learning within the subrule.

MacIntosh stated this had already been covered in an earlier comment.

Subrule (1)(a): MacIntosh read the public comment from Steve Nichols about adding the American Council of Engineering Companies (ACEC) to the list.

Hookham stated that not all courses from the ACEC are valuable as continuing education.

Fobes stated that the Rules Committee did not want the appearance of advocating for a private firm when creating the list.

Fedele stated that the list is not all inclusive. It was created to give guidance.

Stevens asked if the Michigan Society of Professional Engineers (MSPE) offers continuing education.

Wheeler stated that the MSPE offers continuing education but understands the distinction in the subrule. He stated that listing a private society would give the appearance of endorsing.

Hookham stated that the subrule allows other organizations that could be comparable.

Stevens and Hookham stated that activities from private organizations are covered under other activities within the subrule (1).

The Rules Committee did not agree with the requested change.

R 339.16032 Professional engineer seal.

MacIntosh read the public comment about the need for a change in the license number on the seal.

MacIntosh stated that the 10 digits stand for the full license number.

Fedele pointed out that the licensee has two years to obtain a new seal.

Wysack explained that the first 4-digits of the number represent the profession and the rest of the numbers are a rolling number, therefore could possibly be the same as an individual in another profession.

Roselle stated that all 10-digits are needed to verify an individual online.

McLaughlin stated that the Regulatory Impact Statement included a cost analysis of obtaining a new seal.

The Rules Committee agreed that this rule will remain as written.

MacIntosh read the public comment from Craig Hoff, on page 118 of the public hearing transcript, about not being able to obtain credit for taking classes through the Society of Automotive Engineers.

Stevens stated that credit is allowed under R 339.16041(1).

Hookham and Fobes both agreed with Stevens.

ADJOURNMENT

MacIntosh stated that the comments from the meeting would be put together in a summary document to present to the full board at the meeting in January 2020. Once the Board votes to approve the rules, they will then be presented to the Joint Committee on Administrative Rules.

Roselle adjourned the meeting at 10:30 a.m.

Prepared by:
Stephanie Wysack, Board Support
Bureau of Professional Licensing

November 20, 2019

DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS

DIRECTOR'S OFFICE

PROFESSIONAL ENGINEERS – GENERAL RULES

Filed with the secretary of state on

These rules take effect immediately upon filing with the secretary of state unless adopted under section 33, 44, or 45a(6) of the administrative procedures act of 1969, 1969 PA 306, MCL 24.233, 24.244, or 24.245a. Rules adopted under these sections become effective 7 days after filing with the secretary of state.

(By authority conferred on the board of **professional engineers** by section 308 of the **occupational code**, 1980 PA 299, MCL 339.308; and on the director of the department of licensing and regulatory affairs by ~~section~~**sections 205 and 2009** of the **occupational code**, 1980 PA 299, MCL 339.205; **and 339.2009**; and Executive Reorganization Order Nos. **1991-9**, 1996-2, 2003-1, ~~2008-4~~, and 2011-4, **MCL 338.3501**, ~~MCL 445.2001~~, ~~MCL 445.2011~~, ~~MCL 445.2025~~, and ~~MCL 445.2030~~)

R 339.16001, R 339.16021, R 339.16022, R 339.16025, R 339.16026, R 339.16031, R 339.16032, R 339.16040, and R 339.16041 of the Michigan Administrative Code are amended, and R 339.16024, R 339.16033, R 339.16034, R 339.16042, R 339.16043, and R 339.16044 are rescinded, as follows:

PART 1. GENERAL PROVISIONS

R 339.16001 Definitions.

Rule 1. (1) As used in these rules:

(a) **“Act” means the occupational code, 1980 PA 299, MCL 339.101 to 339.2677.**

(b) **“Board” means the Michigan board of professional engineers created under section 2002 of the act, MCL 339.2002.**

~~(a)~~(c) **“Continuing education” means an instructional course or activity designed to bring licensees up to date on a particular area of knowledge or skills relevant to a licensee’s area of professional practice.**

~~(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. Regular duties for compensation shall not be considered are not qualified activities, except for employer compensated continuing education activities.**

(e) **“Department” means the Michigan department of licensing and regulatory affairs.**

~~(c)~~ **“Distance learning” means any of the following:**

~~(i)~~ **Courses where an instructor and a licensee may be apart and instruction takes place through online or electronic media.**

~~—(ii) Courses which include, but are not limited to, instruction presented through interactive classrooms, at the job site, computer conferencing, and interactive computer systems.~~

(2) Terms defined in the act have the same meanings when used in these rules.

PART 2. LICENSURE

R 339.16021 ~~Degree acceptability; criteria; experience credit; transcripts.~~ **Educational requirement.**

Rule 21. ~~(1) A bachelor's degree shall be judged by the board for acceptability on the basis of criteria entitled "Criteria For Accrediting Engineering Programs in the United States" dated October 29, 2005, which are incorporated by reference. The accrediting criteria may be obtained at no cost from the Accreditation Board for Engineering and Technology (ABET), 7111 Market Place, Suite 1050, Baltimore, Maryland 21202, phone number:(410)347-7700; website: www.abet.org. The accrediting criteria are also available for review at the offices of the Michigan Board of Professional Engineers, 2501 Woodlake Circle, Okemos, Michigan 48864. An applicant for licensure shall submit to the department 1 of the following to satisfy the educational requirement under the act:~~

(a) **Transcripts verifying that he or she received a baccalaureate degree or higher degree in engineering from a program accredited by the Engineering Accreditation Commission of the Accreditation Board for Engineering and Technology, Inc. (EAC/ABET) or the Canadian Engineering Accreditation Board (CEAB).**

(b) **Transcripts verifying that he or she received a master's degree or doctorate in engineering from a school and program with an EAC/ABET-accredited or a CEAB-accredited baccalaureate degree program that is in the same engineering discipline as his or her master's degree or doctorate.**

(c) **A credentials evaluation from the National Council of Examiners for Engineering and Surveying (NCEES) that verifies all of the following:**

(i) **The applicant for licensure received either of the following:**

(A) **A baccalaureate degree in engineering from a non-United States-based program.**

(B) **A master's degree or doctorate in engineering from a non-EAC/ABET-accredited program.**

(ii) **The applicant for licensure completed not less than 32 college semester credit hours in the areas of mathematics and science.**

(iii) **The applicant for licensure completed not less than 48 college semester credit hours in engineering science or engineering design courses that satisfy the course requirements established under the NCEES Engineering Education Standard.**

(d) **A credentials evaluation that verifies he or she received a baccalaureate degree in engineering from an educational program that is substantially equivalent to an EAC/ABET-accredited baccalaureate degree program in engineering. The**

credentials evaluation must be generated by a company that is a current member of the National Association of Credential Evaluation Services (NACES).

~~-(2) The department may accept 1 or both of the following as prima facie proof of a bachelor's degree in engineering, or its equivalent, acceptable to the board:~~

~~-(a) Official transcripts verifying a degree which is granted by an educational institution in a program which meets the current criteria of the accreditation board for engineering and technology for programs in engineering in the United States.~~

~~-(b) Official transcripts verifying possession of a master's degree in engineering from a school and program with an Engineering Accreditation Commission/Accreditation Board for Engineering and Technology (EAC/ABET) or Canadian Engineering Accreditation Board (CEAB) accredited bachelor's degree in the same engineering discipline as the master's degree.~~

~~-(3) All other bachelor's degrees shall be evaluated individually through an analysis of the equivalency between the applicant's programs and the program criteria referred to in subrule (2) of this rule.~~

~~-(4) The holder of a bachelor's degree in engineering accepted by the board shall be granted 4 years of experience credit toward the 8-year experience requirement established by the act.~~

~~-(5) The holder of a master's degree or doctorate degree in engineering accepted by the board shall be granted an additional 1 year of experience credit, for each degree, toward the 8-year experience requirement established by the act.~~

~~-(6) An applicant shall provide official transcripts and other documents as required by the department for evaluation and determination of acceptability of a degree, including documentation by the educational institution verifying that the course content of the degree meets the criteria specified in this rule.~~

~~-(7) The department may accept an official transcript from an accredited educational institution as proof of completion of the required number of humanities/social science credits.~~

R 339.16022 Professional engineering experience; credit for work experience; credit for educational experience.

~~Rule 22. (1) Acceptable professional work experience required by the act for an examination applicant shall be engineering work which requires the application of engineering principles and data, such as consultation, investigation, evaluation, planning, design, or review of materials and completed phases of work in construction, alteration, or repair in connection with a public or private utility, structure, building, machine, equipment, process, work, or project. Pursuant to section 2004(2)(a) of the act, MCL 339.2004(2)(a), an applicant for professional engineer licensure shall document at least 8 years of professional experience in engineering work, including not more than 5 years of education granted under subrule (4) of this rule. An applicant shall satisfy the requirements of this rule to receive credit for professional experience.~~

(2) An applicant for licensure shall submit either of the following to the department to receive credit for professional experience in engineering work:

(a) Proof acceptable to the department verifying that he or she has obtained not less than 4 years of experience practicing as a licensed or registered professional engineer in another state.

(b) All of the following:

(i) The dates of performing engineering work that qualifies as professional experience under subrule (3) of this rule.

(ii) The supervising individual's name and license or registration number and the state in which the supervising individual is licensed or registered as a professional engineer.

(iii) Documentation from the supervising individual attesting to the work experience, dates of work, and supervision.

~~(2) (3) Acceptable professional experience in engineering is experience which is achieved after receiving a baccalaureate degree in engineering or its equivalent. Engineering experience obtained prior to graduation may be acceptable if of a professional nature as described in subrule (1) of this rule. Engineering work that satisfies all of the following requirements qualifies as professional experience:~~

~~(a) The work involves the use of engineering principles and data.~~

~~(b) The work is in the form of consultation, investigation, evaluation, planning, design, or review of materials or completed phases of work in the construction, alteration, or repair in connection with a public or private utility, structure, building, machine, equipment, process, work, or project.~~

~~(c) The work is performed while under the direction of a professional engineer licensed in Michigan or licensed or registered in another state.~~

~~(3) (4) Acceptable experience, as defined in subrule (1) of this rule, shall be performed by the applicant under the direction of a licensed professional engineer or a person of equivalent professional standing. The department shall grant not more than 5 years of professional experience credit to an applicant holding a degree that satisfies the requirements under R 339.16021. Credit shall be limited to the following amounts:~~

~~(a) Not more than 4 years of professional experience for a baccalaureate degree in engineering. Experience shall be granted for only 1 baccalaureate degree.~~

~~(b) Not more than 1 year of professional experience for a post-baccalaureate degree in engineering. Experience shall be granted for only 1 post-baccalaureate degree.~~

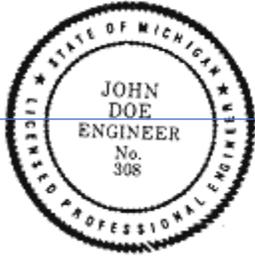
~~(4) An applicant shall provide the department with a description of work experience with the examination application and shall cause verification of work experience to be filed with the department by persons familiar with the nature of the work performed by the applicant.~~

R 339.16024 Professional engineer seal; use; validation. **Rescinded.**

~~Rule 24. (1) After meeting the licensing requirements prescribed by the act and these rules, an applicant shall be licensed by the department according to the act.~~

~~(2) Upon being licensed, a licensee shall obtain a seal authorized by the board. As prescribed by the act, the seal of a professional engineer shall have the following design:~~

Figure for 339.16024



~~No other design for a seal shall be used~~

~~-(3) A licensee's seal shall be used by the licensee whose name appears thereon for so long as the license remains in effect. A licensee shall be responsible for the security of the licensee's seal.~~

R 339.16025 Licensure-Relicensure requirements.

~~Rule 25. (1) For licensure by reciprocity, the board may consider educational requirements equivalent to those in effect in Michigan at the time of primary licensing. An applicant whose license has lapsed for less than 3 years after the expiration date of the last license may be relicensed under section 411(3) of the act, MCL 339.411(3), by satisfying all of the following requirements:~~

~~(a) Submitting a completed application on a form provided by the department.~~

~~(b) Paying the required fee to the department.~~

~~(c) Submitting proof to the department verifying that he or she has completed 15 hours of continuing education in activities approved under R 339.16041 during the 12 months immediately preceding the date of filing the relicensure application. If the department determines that the amount of continuing education hours submitted with the application is deficient, the applicant has 1 year from the date of filing the application to provide proof of completing the deficient hours.~~

~~(2) An applicant who holds a valid professional engineering license in another United States jurisdiction may submit verification of 5 years of licensed practice in responsible charge of engineering work acceptable to the board as equivalent to satisfactory completion of the fundamentals of engineering (FE) examination. An applicant whose license has lapsed for 3 years or more after the expiration date of the last license may be relicensed under section 411(4) of the act, MCL 339.411(4), by satisfying all of the following requirements:~~

~~(a) Submitting a completed application on a form provided by the department.~~

~~(b) Paying the required fee to the department.~~

~~(c) Establishing that he or she has met all of the requirements for initial licensure under the act and these rules.~~

~~(d) Submitting proof to the department verifying that he or she has completed 30 hours of continuing education in activities approved under R 339.16041 during the 24 months immediately preceding the date of filing the relicensure application. If the department determines that the amount of continuing education hours submitted with the application is deficient, the applicant has 1 year from the date of filing the application to provide proof of completing the deficient hours.~~

~~(3) An applicant who holds a valid professional engineer's license in another United States jurisdiction may submit verification of 15 years of licensed practice in responsible charge of engineering works acceptable to the board as equivalent to satisfactory completion of the principles and practice of engineering (PE) examination.~~

R 339.16026 Examination ~~equivalency~~ **requirements.**

Rule 26. ~~The department may consider an applicant for licensure to have satisfied the requirements of MCL 339.2004(2)(b) who satisfies both of the following:~~ **An applicant for professional engineer licensure shall submit to the department both of the following to satisfy the examination requirements under the act:**

(a) ~~Has passed the principles and practice examination and~~ **Verification that he or she achieved a passing score as determined by NCEES on either of the following examinations:**

(i) **The NCEES Principals and Practice of Engineering examination.**

(ii) **Both components of the NCEES Structural Engineering examination, known as SE-I and SE-II.**

(b) ~~Has passed the fundamentals of engineering examination or holds a doctoral degree in engineering from a school with an EAC/ABET or CEAB accredited bachelor's degree in the same engineering discipline as the doctoral degree, provided that the applicant's bachelor's degree is equivalent to an EAC/ABET or CEAB accredited degree.~~

Verification of either of the following:

(i) **He or she achieved a passing score as determined by NCEES on the NCEES Fundamentals of Engineering examination.**

(ii) **He or she received a doctorate in engineering from a school and program with an EAC/ABET-accredited or a CEAB-accredited baccalaureate degree program that is in the same engineering discipline as his or her doctorate in engineering.**

PART 3. STANDARDS OF PRACTICE AND PROFESSIONAL CONDUCT

R 339.16031 ~~Solicitation of employment; restrictions; exception.~~ **Professional conduct; requirements; restrictions.**

Rule 31. (1) ~~In the solicitation of employment, a licensee shall not falsify or permit misrepresentation of the academic or professional qualifications of the licensee or the licensee's associates. A licensee shall comply with all of the rules of conduct under this part.~~

(2) ~~A licensee shall not offer to pay or give, or pay or give, directly or indirectly, to a client, potential client, the agent of a client, or the agent of a potential client, a commission, contribution, gift, or other substantial valuable consideration to secure or retain engineering work. This restriction does not include payments to an employment agency for the purpose of securing employment or employees for salaried positions. A licensee shall do all of the following:~~

(a) If he or she is the person in responsible charge, he or she shall notify his or her employer or client, and any other appropriate authority when his or her judgment is overruled under circumstances that endanger life or property.

(b) If he or she is not the person in responsible charge, he or she shall notify the person in responsible charge when his or her judgment is overruled under circumstances that endanger life or property.

(c) Participate in phases of a project in which he or she is competent.

(d) Undertake assignments in which he or she is qualified by education or experience in the specific technical field involved.

(e) Complete, sign, seal, or approve engineering documents that conform with the law and applicable professional standards.

(f) Be objective and truthful in professional reports, statements, or testimony and include all relevant and pertinent information in these reports, statements, or testimony.

(g) Disclose to an employer, client, or public body on which he or she serves all known or potential conflicts of interest that could influence or appear to influence his or her judgment or the quality of his or her services.

~~(3) A licensee shall seek professional employment on the basis of the licensee's qualifications, competence, and ability to properly accomplish the employment sought.~~

A licensee shall not do any of the following:

(a) Disclose confidential information obtained in a professional capacity without the prior consent of the client or employer, unless authorized or required by law or these rules.

(b) Partner, practice, or offer to practice with any person or firm or assist any person or firm that he or she knows is engaged in fraudulent or dishonest business or professional practices or the unlawful practice of professional engineering.

(c) Falsify his or her qualifications or the qualifications of his or her associates or permit misrepresentations of his or her qualifications or the qualifications of his or her associates.

(d) Misrepresent or exaggerate his or her experience or qualifications.

(e) Knowingly make statements containing a material misrepresentation of fact or omitting a material fact or knowingly make statements that deceive the public.

(f) Attempt to injure, maliciously or falsely, directly or indirectly, the professional reputation, prospects, practice, or employment of other licensed professional engineers.

(g) Give or offer to give, directly or indirectly, to a client, potential client, the agent of a client, or the agent of a potential client, a commission, contribution, gift, or other valuable consideration to secure or retain engineering work. This restriction does not include payments to an employment agency for securing employment or employees for salaried positions.

(h) Solicit or accept a compensation, contribution, gift, or other valuable consideration, directly or indirectly, from more than 1 party for services on the same project, or for services pertaining to the same project, unless the circumstances are fully disclosed and agreed to by all interested parties.

(i) Solicit or accept a commission, contribution, gift, or other valuable consideration, directly or indirectly, from other parties dealing with his or her

clients or employers, or from outside agents who have no dealings with his or her client or employer, in connection with the work for which he or she is responsible, unless the circumstances are fully disclosed and agreed to by all interested parties.

(j) Solicit or accept a commission, contribution, gift, or other valuable consideration, directly or indirectly, under circumstances in which his or her judgment may be compromised.

(k) Complete, sign, seal, or approve engineering documents that do not conform with the law or applicable professional standards.

(4) Work for which the licensee is responsible, the procedures followed, and the decisions made by persons under the licensee's supervision must be subject to sustained review and approval by the licensee.

R 339.16032 ~~Conflict of interest.~~ **Professional engineer seal.**

Rule 32. (1) ~~To avoid a conflict of interest, a licensee shall promptly inform, in writing, an employer or client of the licensee or a public body on which the licensee serves of any employment, business association, interest, duty, or circumstance if the employment, business association, interest, duty, or circumstance is with another and involves the current or prospective work assignment of the licensee with that employer, client, or public body.~~ **Effective 2 years after the promulgation of this rule, the seal of a professional engineer must include the licensee's full name and license number, as shown on his or her state-issued professional engineer license, and indicate "State of Michigan" and "Licensed Professional Engineer" in the legend surrounding the seal. The seal must have a design substantially similar to figure 32 below.**

(2) ~~A licensee shall not accept compensation, financial or otherwise, from more than 1 party for services performed on the same project or assignment, unless the circumstances are fully disclosed to all parties that pay, or are required to approve payment, for the work performed by the licensee.~~ **A licensee's seal shall be used by the licensee whose name appears on the seal for as long as the license remains in effect. A licensee is responsible for the security of his or her seal.**

FIGURE 32



~~(3) A licensee shall not solicit or accept gratuities, directly or indirectly, from contractors, their agents, or other parties dealing with the client or employer of the licensee in connection with work for which the licensee is responsible. A licensee shall~~

~~not solicit or accept financial or other valuable consideration from another for specifying products or services.~~

~~R 339.16033 —Participation in engineering projects; competence required. **Rescinded.**
—Rule 33. A licensee shall undertake to participate only in those phases of a project in which the licensee is competent. In the areas of a project involving architecture, professional engineering, and land surveying in which the licensee lacks competence, the licensee shall retain licensed professional associates for those phases of that project.~~

~~R 339.16034 —Work review and approval of procedures and decisions of persons under licensee's supervision. **Rescinded.**
—Rule 34. On work for which the licensee is responsible, the procedures followed and the decisions made by persons under the licensee's supervision shall be subject to sustained review and approval by the licensee.~~

PART 4. LICENSE RENEWAL AND CONTINUING EDUCATION

~~R 339.16040 Continuing education required for renewal; certification of compliance; document retention; continuing education waiver license renewal; requirements.~~

~~Rule 40. (1) A licensee shall obtain continuing education, as specified in R 339.16042.~~
An applicant for license renewal who has been licensed during the 2-year period immediately preceding the expiration date of the license shall obtain not less than 30 hours of continuing education in activities approved under R 339.16041 during the 2-year period immediately preceding the expiration date of the license.

~~(2) A licensee shall certify the completion of continuing education requirements as a condition for licensure renewal in a format prescribed by the department.~~
Submission of an application for renewal constitutes the applicant's certification of compliance with this rule and R 339.16041.

~~(3) The department shall not renew a license if the continuing education requirements have not been completed.~~
A licensee shall retain documentation of satisfying the requirements of this rule and R 339.16041 for a period of 4 years from the date of filing the application for license renewal.

~~(4) A licensee shall submit to the department evidence of fulfillment of the continuing education requirements within 45 days of a request from the department for the evidence to be submitted.~~
A licensee is subject to audit under this part and may be required to submit documentation as described by R 339.16041 upon request of the department.

~~(5) A request for a continuing education waiver pursuant to section 204(2) of the act, MCL 339.204(2), must be received by the department before the expiration date of the license.~~

R 339.16041 Acceptable continuing education; limitations.

Rule 41. (1) **The department shall grant credit for continuing education hours that satisfy the requirements in the following chart:**—Continuing education hours may be acquired in another jurisdiction.

~~(2) Continuing education hours shall be relevant to the occupation and may be earned as follows:~~

- ~~(a) Successfully completing a college course.~~
- ~~(b) Successfully completing a continuing education course.~~
- ~~(c) Successfully completing a distance learning course.~~
- ~~(d) Presenting or attending a seminar, in-house course, workshop, or professional or technical presentation made at a meeting, convention, or conference.~~
- ~~(e) Teaching, instructing, or presenting an acceptable course or activity listed in subrule 2(a) to (d) of this rule.~~
- ~~(f) Publishing a peer reviewed paper, article, or book in the licensee's area of professional practice.~~
- ~~(g) Serving as a member of the state board of professional engineers or attending a state board of professional engineers meeting.~~
- ~~(h) Participating in a company sponsored seminar or training that is designed to enhance professional development in the licensee's area of professional practice.~~
- ~~(i) Serving as a mentor to an engineering student in a school sponsored program.~~
- ~~(j) Obtaining patents related to engineering.~~

~~(3) Continuing education hours shall be granted once during a renewal period in which the hours were earned for the same course or activity that a licensee completed as either a licensee, instructor, or presenter.~~

~~(4) Continuing education hours shall be granted once for the first time a course is offered or presented provided that the course is not associated with a licensee's regular duties as a member of a faculty.~~

~~(5) Continuing education hours shall not be earned for any of the following activities:~~

- ~~(a) Passing an examination to obtain licensure.~~
- ~~(b) Completing a course that does not provide a licensee access to an instructor during the course.~~
- ~~(c) Completing a course that is not designed to bring licensees up to date on a particular area of knowledge or skills in the licensee's area of professional practice.~~
- ~~(d) Attending a cultural performance, entertainment, or recreational meeting or activity, or participation in a travel group.~~

~~(6) The conversion of other units of credit per renewal cycle shall be as follows:~~

- ~~(a) 1 college semester credit hour equals 45 continuing education hours.~~
- ~~(b) 1 college quarter credit hour equals 30 continuing education hours.~~
- ~~(c) Publishing a peer reviewed paper, article, or book in the licensee's area of professional practice equals 6 continuing education hours.~~
- ~~(d) Serving as a member of the state board of professional engineers or attending a state board of professional engineers meeting equals 2 continuing education hours.~~
- ~~(e) Serving as a mentor for an engineering student in a school sponsored program equals 4 continuing education hours.~~
- ~~(f) Obtaining patents related to engineering equals 10 continuing education hours.~~

Activity Code	Activity and Proof Required	Number of Continuing Education Hours Granted for Activity
(a)	<p>Completing a continuing education program or activity related to professional engineering that is approved or offered for continuing education credit by any of the following:</p> <ul style="list-style-type: none"> • Another state’s board of engineers. • Michigan Society of Professional Engineers. • NCEES. • ABET. <p>If audited, a licensee shall submit documentation or certificate of completion showing the licensee’s name, total continuing education credits earned, sponsor name and contact information, program title, and the date the program was held or completed.</p>	<p>The number of continuing education hours approved by the approving entity are granted for this activity.</p>
(b)	<p>Passing an academic course related to professional engineering offered by a college or university that offers a baccalaureate degree or higher degree in an engineering program that is accredited by EAC/ABET or CEAB.</p> <p>If audited, a licensee shall submit a copy of the transcript showing the number of credit hours of the academic courses related to professional engineering.</p>	<p>Fifteen continuing education hours are granted for each semester credit or 10 continuing education hours are granted for each quarter credit.</p>
(c)	<p>Attending a seminar, in-house course, workshop, or professional or technical presentation related to professional engineering.</p> <p>If audited, the licensee shall submit a copy of the presentation notice or advertisement showing the date of the presentation, the licensee’s name listed as a presenter or attendee, and the name of the organization that approved or offered the presentation.</p>	<p>One continuing education hour is granted for every 50 minutes attending the activity.</p>

(d)	<p>Teaching, instructing, or presenting a subject related to professional engineering.</p> <p>If audited, a license shall submit documentation by the college or university confirming the licensee as the teacher, instructor, or presenter of the academic course, the dates of the course or presentation, the number of classroom hours spent teaching, instructing, or presenting, and the course title.</p>	<p>Two continuing education hours are granted for every 50 minutes of teaching, instruction or presenting.</p> <p>A maximum of 12 continuing education hours are granted for this activity during each renewal period.</p>
(e)	<p>Publication of a peer-reviewed paper, article, or book related to professional engineering.</p> <p>If audited, the licensee shall submit a copy of the publication that identifies the licensee as the author or a publication acceptance letter.</p>	<p>Six continuing education hours are granted for this activity.</p> <p>Credit is not granted for multiple publications of the same peer-review paper, article, or book.</p> <p>A maximum of 18 continuing education hours are granted for this activity during each renewal period.</p>
(f)	<p>Serving as a voting member on a state or national committee, board, council, or association related to professional engineering. To receive credit, a licensee must participate in at least 50% of the regularly scheduled meetings of the committee, board, council, or association.</p> <p>If audited, a licensee shall submit documentation satisfactory to the department verifying the licensee's participation in at least 50% of the regularly scheduled meetings of the committee, board, council, or association and provide verification of the licensee's status as a voting member on the committee, board, council, or association.</p>	<p>Three continuing education hours are granted for the year in which the licensee serves as a member.</p> <p>A maximum of 6 continuing education hours are granted for this activity during each renewal period.</p>
(g)	<p>Attending a Michigan board of professional engineers meeting. To receive credit, the licensee shall obtain a form provided by the department from a department employee</p>	<p>One continuing education hour is granted for each meeting attended.</p>

	<p>present at the meeting and have that employee complete, sign, and date the form. The licensee shall present a valid government-issued photo identification to the department employee for verification.</p> <p>If audited, the licensee shall submit a copy of the form completed, signed, and dated by the department employee who was present at the meeting.</p>	<p>A maximum of 6 continuing education hour are granted for this activity during each renewal period.</p>
(h)	<p>Serving as a school-sponsored mentor to an engineering student in a school-sponsored program. To receive credit, this activity must not be part of the licensee's regular job description.</p> <p>If audited, the licensee shall submit a letter from an authorized official from the school verifying the licensee's role and the number of mentoring hours the licensee provided.</p>	<p>Four continuing education hours are granted for this activity.</p> <p>A maximum of 8 continuing education hours are granted for this activity during each renewal period.</p>
(i)	<p>Participating in a company-sponsored or hosted seminar or training that is designed to enhance professional development in the licensee's area of professional practice.</p> <p>If audited, a licensee shall submit documentation or a certificate of completion issued by the company presenting the seminar or training showing the licensee's name, company name, subject of seminar or training, and the date on which the seminar or training was held.</p>	<p>One continuing education hour is granted for every 50 minutes of the seminar or training.</p>

(2) Continuing education hours are not granted for a program or activity that has substantially the same content of a program or activity for which the applicant has already earned continuing education hours during the renewal period.

(3) Not more than 12 continuing education hours shall be earned during a 24-hour period.

R 339.16042 ~~Continuing education hours required; renewal.~~ **Rescinded.**

~~—Rule 42. Continuing education hours required for renewal shall be as follows:~~

~~—(a) A licensee who holds a license for more than 12 months, but less than 24 months from the date of initial licensure shall obtain 15 hours of continuing education for the first renewal period.~~

~~—(b) A licensee who holds a license for 24 months or more from the date of initial licensure shall obtain 30 hours of continuing education for the renewal period.~~

~~R 339.16043 Determination of credit; forms; record keeping. **Rescinded.**~~

~~—Rule 43. A licensee shall maintain records of continuing education hours earned for 4 consecutive years. The records shall include the following:~~

~~—(a) The courses or activities completed, the dates when the courses or activities were held and the duration of the courses or activities, the sponsoring organization, the instructor's or speaker's name, and the hours earned.~~

~~—(b) Verification of attendance at a course or activity, such as completion certificates or other supporting documentation.~~

~~R 339.16044 Auditing. **Rescinded.**~~

~~—Rule 44. The department may establish a process for auditing licensees regarding continuing education for compliance with the act and these rules.~~

Department of Licensing and Regulatory Affairs
Bureau of Professional Licensing– Boards and Committees Section
P.O. Box 30670 Lansing, MI 48909-8170
Attention: Policy Analyst Email: BPL-BoardSupport@michigan.gov

In Re Proposed rule changes for Professional Engineers - objections to portions of the Regulatory Impact Statement & Cost-Benefit Analysis (RIS) transmitted to The Michigan Office of Administrative Hearings and Rules in August 2019

To: Michigan Board of Professional Engineers

Sections of the RIS numbered 12, 19, 29, and 34 indicate (Section 12 (A)) “There is no identified burden on individuals as a result of the proposed rules.” or the like.

As will be developed, the actual burden is expected to have a cost in the neighborhood of at least \$3,000.

The majority of licensed Professional Engineers are reasonably believed to be Civil Engineers. The ASCE has conducted an extensive survey and found that the median income of licensed civil engineers was \$115,000 per year in 2018 - nominally \$2,300 a week. The required 30 hours of CE easily encumber an entire week of lost productivity. Add cost of transportation to CE courses and tuition at a typical \$25 per hour results in a typical burden of well over \$3,000. Additionally, one needs to expend administrative time and effort to keep track of CE hours. Any reasonable person with knowledge of what is needed to satisfy the PE CE requirements would conclude that satisfying the requirement is burdensome.

Parenthetically, one could imagine a “thrifty” PE ignoring the CE requirement knowing he or she has only a 7% chance of paying a \$1750 fine and then performing 30 hours of CE.

Clearly, the RIS was crafted without knowledge of the burden. It is requested that future RIS include reasonable estimates of the actual burden required to satisfy the PE’s CE requirement.

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
JCM@Kettering.Edu September 23, 2019 One Page

Department of Licensing and Regulatory Affairs
Bureau of Professional Licensing– Boards and Committees Section
P.O. Box 30670 Lansing, MI 48909-8170
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

JCM@Kettering.Edu

September 23, 2019

Two Pages

Department of Licensing and Regulatory Affairs
Bureau of Professional Licensing– Boards and Committees Section
P.O. Box 30670 Lansing, MI 48909-8170
Attention: Policy Analyst Email: BPL-BoardSupport@michigan.gov

In Re Proposed changes to rules for Professional Engineers in Michigan.

To: Michigan Board of Professional Engineers

On May 8, 2019 the PE Board voted to accept changes to the rules for PE in Michigan generated in an apparently unannounced meeting of a subset of the board on April 12, 2019. Comments prior to final rule making is appropriate.

Current rules, especially those of Section 4 dealing with CE requirements for renewal of PE license, are inappropriately disadvantaged to Professional Engineers who are consulting engineers or engineering researchers or engineering faculty at ABET accredited engineering universities. Inappropriateness would be continued by the proposed rule changes.

Professional Engineers who are consultants or who are engaged in engineering research or who are professors of engineering in an ABET accredited engineering program maintain currency (presumed to be the goal of MCL 339.2009 authorizing CE requirements) in ways either not included in current or proposed rules or that are inappropriately attenuated by current or proposed rules.

For this communication, Professional Engineers who are consultants or who are engaged in engineering research or who are professors of engineering in an ABET accredited engineering program shall be called High Level Professional Engineers (HLPE).

Clearly, HLPE engineers of necessity to their level of engineering, are continually engaging in CE. However, the means for HLPE engineers to receive CE credit are either attenuated or not included in the current CE rules nor in the proposed rules.

About proposed rules and several proposed augmentations to the rules in Section 4:

1. The CE aspects of what engineering faculty at ABET accredited universities perform in order to teach engineering courses is not appropriately included in the proposed Rule 41 (1)(d). Such courses taken by a PE would receive CE credit. Significant and continuing study and preparation is needed by engineering faculty at ABET accredited universities to maintain the high level expected by the university and ABET. An addition to the proposed Rule 41 chart is proposed that mirrors proposed Rule 41 (1)(b) as follows:

Rule 41 (1)(■) Teaching an academic course related to engineering by a faculty member at a college or university that offers a baccalaureate degree or higher in an engineering program that is accredited by EAC/ABET or CEAB even if paid to do so.

If audited, a licensee shall submit a statement from his/her department head, or dean of engineering, indicating for each distinct engineering course taught at least once per renewal period the course name, number as seen in university's catalog, course credit hours, and a short description of the course content and goals.

Once per renewal period, for each distinct engineering course taught by an engineering faculty member at an ABET accredited university:

Fifteen continuing hours are granted for each semester credit and ten continuing education hours are granted for each quarter credit with a maximum of 30 CE credit hours..

2. For many Professional Engineers, much of their continuing education is effected through the reading and study of the content of publications from significant engineering societies. This major means of continuing education is not effectively included in the proposed rules. To avoid uncertainty about what constitutes a significant engineering society, it is wise to have an inclusive list of same. An addition to the proposed Rule 41 chart is proposed as follows:

Rule 41 (1)(■) Membership in a significant engineering society including good-faith study of the advanced engineering content of society's journal or journals. Societies include: Society of Automotive Engineers; Institute of Electrical and Electronics Engineers; American Society of Civil Engineers; Applied Computational Electromagnetics Society; American Institute of Chemical Engineers; American Society of Mechanical Engineers; American Institute of Mining, Metallurgical, and Petroleum Engineers; Society for the Advancement of Material and Process Engineering; American Society for Nondestructive Testing; Institute of Transportation Engineers; Society of Manufacturing Engineers

If audited, a licensee shall submit evidence of membership in each society. For each society, a reference to a paper/article that was particularly relevant to the licensee's continuing education shall be provided including title, short abstract, and citation.

Ten hours of continuing education are granted for each membership with a maximum of 20 hours for this activity during each renewal period.

3. Faculty at ABET accredited universities regularly act as advisors and mentors to thesis projects of engineering students. Proposed Rule 41 (1)(h) does not capture the high level of thesis advising. The CE aspects of this activity is obvious and a rule is proposed to encompass this as follows:

Rule 41 (1)(■) Advising and mentoring an engineering student's thesis to completion as a faculty member at a college or university that offers a baccalaureate degree or higher in an engineering program that is accredited by EAC/ABET or CEAB even if paid to do so.

If audited, a licensee shall submit the thesis student's name, thesis title (unless confidential), date of completion of the thesis, and type of engineering involved (Chemical, Civil, Electrical, Mechanical . . .)

Fifteen hours of credit are granted for each completed thesis with a maximum of 30 hours for this activity during each renewal period.

4. As proposed in a separate paper dealing mostly with Section 1 of the PE Rules, “Distance Learning” should be included in proposed Rule 41 (1) (c) As follows:

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

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

JCM@Kettering.Edu

September 23, 2019

Four Pages

I am Steve Nichols representing the American Council of Engineering Companies of Michigan often referred to as ACEC/Michigan. ACEC/ Michigan represents more than 100 engineering companies in Michigan who have over 6,000 employees, the majority being licensed professionals. ACEC Michigan is also a registered continuing education provider through the Registered Continuing Education Program (RCEP.net). Through ACEC/Michigan programs, conferences, workshops, and seminars, nearly 100 hours of continuing education are offered each year to our member firms and other professionals. Many of the professional engineers have licenses in multiple states and use the ACEC/Michigan educational programs to satisfy the continuing education requirements in other states.

Acceptable Cont Edu Part 4 R339.1604

Based on these factors, ACEC should be listed in the chart under Rule 41. (1) (a) as an approved continuing education provider in Michigan.

change to Rule 41. (1)(a)

ACEC/M Educational Programs:

- MDOT/ACEC Workshop
- Michigan Infrastructure Conference
- Emerging Leaders Program
- CEO Roundtables
- NHI Training and Refresher Courses
- PSMJ Bootcamps (2)
- On-line Seminars through ACEC/National
- Joint Training Sessions with Michigan Department of Transportation
- Speakers at Engineers, Architects and Surveyors Legislative Day

From: [BPL-BoardSupport](#)
To: [MacIntosh, Weston \(LARA\)](#)
Subject: FW: License Number on Seal
Date: Thursday, October 03, 2019 4:12:52 PM

I believe this is an Engineer comment.

Thank you,
Stephanie Wysack
Departmental Technician
Boards and Committees Section
Bureau of Professional Licensing
Michigan Department of Licensing and Regulatory Affairs
Phone: 517-241-7500
Email: BPL-BoardSupport@michigan.gov

-----Original Message-----

From: Tom Campbell <tomc.pe@gmail.com>
Sent: Thursday, October 3, 2019 3:45 PM
To: [BPL-BoardSupport <BPL-BoardSupport@michigan.gov>](mailto:BPL-BoardSupport@michigan.gov)
Subject: License Number on Seal

My seal is as depicted in the revised rules except that the license number is a 5 digit number rather than the 10 digit number now appearing on my license, the same number except having a 5 digit prefix added to it. The revised rules state the number on the seal shall be "as shown on his or her state-issued professional engineer license". This will require thousands of engineers to get new seals at considerable expense. What compelling government interest is served in requiring a new seal with the extra digits, especially where the identifying digits have not changed?

Thanks,

Thomas E. Campbell, PE
7237 Mountain Ash Dr. SE
Grand Rapids, MI 49546

1 then speak in the microphone. And everyone's limited to
2 two minutes. The time cards are up here. We'll show you
3 when you have one minute left and when it's time to stop.

4 And I think that's -- oh. If you have
5 something in writing that you're submitting and you're
6 going to read from that we ask that you put a copy up
7 here for the Court Reporter so they have that in case
8 there was issues or questions about that. And I think
9 that's it.

10 We want you to spell your name when you come up
11 here. Say your name and spell your name and then what
12 organization you're from at the beginning. So, I'm just
13 kind of repeating that.

14 So, once again, pharmacy general rules or
15 pharmacy CE rules, anybody else?

16 Professional engineers. Anyone here to speak
17 for professional engineers? Come on up here.

18 STEPHEN NICHOLS: Hi. My name is Stephen
19 Nichols. Steven is spelled S-T-E-P-H-E-N, Nichols,
20 N-I-C-H-O-L-S. I'm here today representing the American
21 Council of Engineering Companies of Michigan often
22 referred to as ACEC/Michigan.

23 ACEC/Michigan represents more than a hundred
24 engineering companies in Michigan who employ over 6,000
25 people. The majority of these are licensed

1 professionals. ACEC/Michigan is also registered for
2 continuing education, a continuing education provider
3 through the registered continuing education program,
4 RCEP.net.

5 Through ACEC/Michigan programs, conferences,
6 workshops, seminars there are nearly a hundred hours of
7 continuing education offered each year to licensed
8 professionals under the engineering licensure. Many of
9 the professional engineers have licenses in multiple
10 states and use the ACEC/Michigan programs to satisfy
11 these continuing education requirements.

12 Based on these facts we believe ACEC/Michigan
13 should be listed under Part 4, Part 339.16041, Rule 41,
14 Section 1A as a continuing, is an approved continuing
15 education provider in Michigan, so we would like the
16 regulations changed to add ACEC/Michigan to that chart.
17 Thank you.

18 MS. DITSCHMAN: Okay. Anybody else here for
19 professional engineers?

20 So, we're going to move on to architects.
21 Anyone here to speak on behalf of the architect rules?
22 No.

23 Occupational therapy?

24 SARA CLARK: Hello. My name is Sara Clark,
25 S-A-R-A, C-L-A-R-K. I'm a licensed occupational

1 will be abandoned if you implement these LARA
2 regulations. Thank you.

3 MR. MacINTOSH: We're going to pause the
4 counseling rules for a second. We have two folks who are
5 going to speak to the engineer's rules.

6 JAMES McLAUGHLIN: Thank you, Madam Chairman.
7 I'm thoroughly chilled, but my voice is still working. I
8 do have some written comments.

9 I'm James McLaughlin. I am associate counsel
10 for Kettering University. I'm also a PE. I'm also a
11 patent attorney. And I'm speaking about the, as we see
12 it, deficiency in the continuing education requirements
13 for people who are particularly in academia who did
14 research and are not civil engineers necessarily. I have
15 submitted to the good lady here some written suggestions
16 on augmenting the rules, particularly in continuing
17 education.

18 What we do is research. What we do is high end
19 things. And the rules as proposed and is as existing
20 make it very difficult for us to appear to satisfy the
21 rules. But, of course, we're continually doing that kind
22 of thing. Again, I warmly encourage the passing of the
23 written materials on down the chain.

24 And I note that we had no inkling that we
25 should be here at 9:00 o'clock, no inkling at all. And

1 I'm sorry to have interrupted the flow of things. These
2 good people out here have been so civil. This is the way
3 the constitution intended petitioning the government.
4 There's no flattery in that. Thank you kindly.

5 And next is our dean of engineering who wants
6 to tell you some more of the things that are not covered
7 by the present rules.

8 CRAIG HOFF: Hi. I'm Dr. Craig Hoff, the Dean
9 of engineering at Kettering University, and I'm
10 representing 12 faculty members who are mechanical and
11 electrical engineers, and the issue is the requirements
12 for continuing education.

13 While this is a really important thing and that
14 we need to have this done, the rules as they are written
15 right now doesn't really cover our particular
16 circumstance. So, as an automotive engineer I would want
17 to take classes through the Society of Automotive
18 Engineers. As the rule is written I couldn't do that for
19 continuing education credit. Instead, the offerings are
20 through professional engineering organizations which are
21 geared toward civil engineers. And I would just like to
22 broaden what those options are.

23 The other thought is as an engineering
24 researcher we are actually developing the knowledge
25 that's going to be passed down through future continuing

1 education courses. Right now I'm working in the area of
2 connected and autonomous vehicles. So, cars are going to
3 be different. And you can't go take a class on this
4 stuff. But I'm working on writing the rules and writing
5 the education. And there ought to be a way to better get
6 recognized for that as staying current in the discipline.
7 So, with that, that's my comments. Thank you very much.

8 MS. DITSCHMAN: So, we're going back to
9 counseling rules.

10 KEITH MATTHEWS: My name is Keith Matthews.
11 K-E-I-T-H, M-A-T-T-H-E-W-S. I'm a licensed professional
12 counselor in Michigan. I have my own practice. I work
13 primarily with single parents and their families. And
14 with any war those in the military know you have to have
15 BOG, boots on ground, and that's what LPCs are. We're
16 the front line. Without intelligence you can't win a
17 war.

18 I have a student/client that I was informed
19 that threatened to kill a teacher. When I went to the
20 school and asked about it the teacher told me she was
21 told not to make waves. Now, I'm obligated to report it.
22 Once I reported it we had a school hearing. At that
23 school hearing seven different teachers had statements
24 that this young man threatened to shoot and kill them.
25 It was not reported. I had to report it to the board. I