

**To: Licensed Health Professionals**

**From: Bureau of Professional Licensing**

**Date: Friday, July 17, 2020**

On Monday, July 13, 2020 the Governor signed [Executive Order 2020-150](#) regarding licensing and certification requirements and rescinded [Executive Order 2020-61](#), which was previously relied upon for guidance in this area. The new Executive Order remains in effect until any state of emergency or disaster related to the COVID-19 pandemic ends. Currently the state of emergency is scheduled to end on August 11, 2020 (*note: now extended to October 1, 2020*).

While some provisions of EO 2020-61 were continued in EO 2020-150, many provisions were not and are therefore no longer in effect. We would encourage you to read both the new and old Executive Orders and note the changes.

Here are some of the key points and changes:

- Many scope of practice and supervision exemption provisions that were in EO 2020-61 have been removed in EO 2020-150 and are no longer in effect. Since these changes were immediate and understanding the problems this may cause for providers, the Department of Licensing and Regulatory Affairs (“Department”) will give providers through 11:59 pm, August 31, 2020 to return to normal order. If the Bureau of Professional Licensing (BPL) receives any complaints covering the timeframe under EO 2020-61 through August 31, 2020 related to scope, supervision and delegation concerns, the bureau will review each complaint on a case by case basis as it has throughout the pandemic.
- The provision under EO 2020-150 allowing those licensed and in good standing in other states or territories to practice in Michigan without a Michigan license has been removed. However, they still may fall under the exemption from licensure provision under MCL 333.16171: [BPL Clarification: Exemption of Michigan Licensure Time of Disaster/State of Emergency](#). Generally this provision of the Public Health Code allows for licensees in good standing from other states to practice in Michigan under this type of emergency situation.
- Executive Order 2020-150, continues to allow the Department to waive an exam as a condition of licensure for health professions “to the extent that the exam’s administration has been canceled while the emergency declaration is in effect.”
  - As noted on our web page ([www.michigan.gov/bpl](http://www.michigan.gov/bpl)) individuals who applied after 12:00 am on July 2, 2020, or thereafter, where the entity offering the exams is scheduling exams, those professions and applicants will not be eligible for an exam waiver. Those who applied prior to that date where the exam was waived, will need to meet all the other requirements for licensure in order to be approved to receive a license.

- BPL will continue to waive the licensing test requirement for professions where the testing center is not open or is not administering the licensing exam. Currently this is mainly dental professions, but you can contact BPL at [BPLHelp@michigan.gov](mailto:BPLHelp@michigan.gov) or 517-241-0199 to confirm.
  - BPL will not have the legal authority to waive exam requirements for applications received after EO 2020-150 or other subsequent EOs are rescinded or when the state of emergency expires.
  - Those receiving a license whose exam was waived during the state of emergency, will be required to take, and pass that exam in order to keep his/her license after the state of emergency expires. Licensees in this situation will be given six months from the end of the declared state of emergency to take and pass the exam. Failure to do this will result in the license being null and void and no longer in effect. Pursuant to the Public Health Code, [MCL 333.16181\(2\)](#), nurses who received Temporary Nursing Licenses have one year from the issuance date of their Temporary License to meet all the requirements for full licensure (passing the exam).
  - However, BPL encourages applicants for licensure of a health profession, including Nursing, to schedule and take the exam now versus delaying taking the exam.
  - More information can be found in this document: [Examination Waiver Guidance](#).
- Executive Order 2020-150 continues to allow the Department to waive continuing education requirements as part of the renewal process for health professionals. This provision only applies to individuals whose license renewal period occurs while the emergency is in effect. To take advantage of this provision, individuals may want to renew as soon as their license renewal period occurs during the state of emergency. Again, the state of emergency is currently scheduled to end on August 11, 2020 (*note: now extended to October 1, 2020*).
  - While not addressed in any current Executive Orders, [Executive Order 2020-82](#) allowed the Department to recognize hours worked by health professionals responding to the COVID-19 pandemic as hours toward continuing education courses or programs required for licensure. Since EO 2020-82 was rescinded the Department will recognize hours worked responding to COVID-19 between March 17, 2020 and June 9, 2020 as continuing education hours at your next renewal, even if that renewal is after the emergency ends. In other words, the hours need to be accumulated during the license cycle you are renewing.
  - Please note all Michigan health professionals are still required to renew their license before the expiration date. No Executive Order waives the license requirement and as such licensees will want to continue to renew on-time or during the 60-day late renewal grace period.
  - Additionally, the provision allowing those licensed and in good standing in another country is not included in EO 2020-150. If an individual was granted a license under this provision, the license will be valid for the duration of the state of emergency.