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# Memorandum

## VIA E-MAIL

**DATE:** August 13, 2021

**TO:** Representative Luke Meerman, Chairperson, JCAR  
Senator Jon Bumstead, Alternate Chairperson, JCAR  
Jonathan Shiflett, Senate Majority Policy Office  
Jimmy Biehl, House Republican Policy Office  
Tim Reeves, Counsel, JCAR  
Elizabeth Edberg, Counsel, JCAR

**FROM:** Derek Sova, Office of Policy and Legislative Affairs

**SUBJECT:** Joint Committee on Administrative Rules (JCAR) Briefing Memo for Podiatric Medicine and Surgery – General Rules (2020-24 LR)

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## Rules Primer

This rule set pertains to the licensure, relicensure, and license renewals of podiatrists. The rules will be amended to provide clarity pertaining to education, training, and testing requirements, telehealth, and continuing education.

## Summary of the Final Proposed Rule

The proposed rules will do all of the following:

- Clarify the length of the postgraduate residency requirement for licensure to reflect current program requirements for certification.
- The rule establishing a minimum English language standard for licensure will be included in the Public Health Code – General Rules, so the requirement will be removed from this rule set.
- Provide up-to-date information regarding the standards for educational programs to assist an applicant to meet licensure requirements.
- Clarify requirements and update the information pertaining to the standards applicable to board-approved providers to assist a licensee in accumulating the continuing education required for license renewal.

### **Stakeholder Engagement**

A public rules workgroup meeting was held on August 13, 2020. Additionally, the board discussed the rules and took comments from the public about the rules at a regularly scheduled board meeting on April 30, 2021.

### **Public Engagement and Public Hearing/Comment/Information**

The public comment period for this rule set opened May 4, 2021 and ended at 5 p.m. on May 17, 2021. The public hearing was held on May 17, 2021, at 9:00 a.m.

The department received comments by email and during the public hearing regarding rule 104. Rule 104 was not a part of the proposed rule set, so a change to that rule now, based on a public comment, would violate the Michigan Administrative Procedures Act. The Michigan Board of Podiatric Medicine and Surgery voted on April 30, 2021, to reopen the rules as soon as the current rule set closes to consider changes to rule 104. The comments received during this public comment period will be considered when the rules are reopened. No comments were received by mail.

### **Significant Issues Not Incorporated in the Final Proposed Rules**

There were no significant issues raised during the rules workgroup meeting that were not addressed in the final proposed rules.

cc/att:           Orlene Hawks, Director, LARA  
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