

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

STATE OF MICHIGAN  
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS  
BUREAU OF PROFESSIONAL LICENSING

- - -

PUBLIC HEARING

MONDAY, MAY 17, 2021

AT ABOUT 9:00 A.M.

- - -

VIA ZOOM TELECONFERENCE

- - -

RE:     Cosmetology - General Rules  
          (MOHR #2020-50 LR)  
  
          Pharmacy - Animal Euthanasia and Sedation Rules  
          (MOHR #2019-86-LR)  
  
          Podiatric Medicine and Surgery - General Rules  
          (MOHR #2020-24 LR)

- - -

HEARING FACILITATOR:

DENA MARKS  
Bureau of Professional Licensing  
611 W. Ottawa Street  
Lansing, Michigan 48909

ALSO PRESENT:   Kerry Ryan Przybylo  
                  Kimberly Catlin  
                  Andria Ditschman

REPORTED BY:    Lori Anne Penn, CSR-1315

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

I N D E X

Opening Statement - Dena Marks 3

- - -

COMMENTS: PAGE

Katherine Pavlik - Cosmetology 6

Chakakhan Hill - Cosmetology 14

Cathy Anderson - Pharmacy 16

Shirene Cece-Clements - Pharmacy 17

Derek Dalling - Podiatric Medicine 19

Stacey Hettiger - Podiatric Medicine 19

- - -

Closing Statement - Dena Marks 21

1                   Lansing, Michigan

2                   Monday, May 17, 2021

3                   At 9:00 a.m.

4                   - - -

5                   (Public hearing commenced pursuant to due notice.)

6                   MS. MARKS: Good morning. My name is  
7                   Dena Marks, and I'm an analyst for the Bureau of  
8                   Professional Licensing in the Department of Licensing and  
9                   Regulatory Affairs. I will be conducting the hearing  
10                  today.

11                  This is a public hearing on the proposed  
12                  administrative rules entitled "Cosmetology - General  
13                  Rules", "Pharmacy - Animal Euthanasia and Sedation  
14                  Rules", and "Podiatric Medicine and Surgery - General  
15                  Rules". We are conducting the hearing as required by the  
16                  Administrative Procedures Act to allow the public to  
17                  comment on the proposed changes to these rule sets. As  
18                  with all other public hearings on draft rule sets, the  
19                  only items discussed during this hearing will be the  
20                  proposed changes to the rule sets. The hearing will not  
21                  be covering any questions or discussions on any other  
22                  issues.

23                  We are calling this hearing to order at  
24                  9:00 a.m. on May the 17th, 2021, via Zoom to comply with  
25                  measures designed to help prevent the spread of

                  Penn Reporting, LLC - lori.penn@yahoo.com

1 Coronavirus 2019, known as COVID-19, and the City of  
2 Lansing Resolution #2021-081. The notice of public  
3 hearing was published in three newspapers of general  
4 circulation, the Flint Journal, the Grand Rapids Press,  
5 and the Mining Journal on May the 4th, 2021, as well as  
6 the *Michigan Register*, Issue #8-2021, published on  
7 May the 15th of 2021.

8 All comments should relate directly to  
9 the proposed rules. If you have questions about the  
10 rules, you may place your comments on the record and the  
11 Department will review and consider them. If you have  
12 suggested changes to the proposed rules, please include  
13 the specific reasons why the changes would be in the  
14 public interest.

15 We will take comments in the following  
16 manner:

- 17 • For those of you using the Video Conference  
18 Portion (not calling on a telephone) please use  
19 the "Raise Your Hand" function in Zoom. I will  
20 call on individuals to speak and they will be  
21 unmuted at that time.
- 22 • For participants that are available only by  
23 telephone, we will ask if you wish to make a  
24 comment after the video participants have  
25 finished.

Penn Reporting, LLC - lori.penn@yahoo.com

- 1           • If you have a comment but do not wish to speak,  
2           please note that the Department will also accept  
3           written statements e-mailed or postmarked to the  
4           BPL-BoardSupport@Michigan.gov until 5:00 p.m.  
5           today.

6                        If you have previously submitted comments  
7           in writing to the Bureau, it is not necessary for you to  
8           repeat your comments on the record today. Comments made  
9           in writing will be reviewed and considered by the  
10          Department in the same manner as comments made during  
11          this public hearing.

12                      Those making comments during this hearing  
13          should clearly and slowly say and spell your name and  
14          advise if you are speaking on behalf of an organization.  
15          We will limit comments to three minutes per person.  
16          Please remember that only one person should speak at a  
17          time.

18                      The Department staff from the Bureau of  
19          Professional Licensing includes me, Kimberly Catlin,  
20          Andria Ditschman, and Kerry Przybylo.

21                      Is there anyone who wishes to make  
22          comments on the Cosmetology - General Rules? Again, if  
23          you are using your video, please use the "Raise Your  
24          Hand" function and we will call on you.

25                      MS. PRZYBYLO: Okay. I think --

                    Penn Reporting, LLC - lori.penn@yahoo.com

1 MS. MARKS: Kathy Pavlik, can you unmute  
2 yourself, and then you may speak, please.

3 KATHERINE PAVLIK: Yes. I have quite a  
4 few things I want to speak on as far as the Cosmetology  
5 Rules are concerned.

6 COURT REPORTER: Can we have your  
7 spelling of your name, please?

8 KATHERINE PAVLIK: Katherine,  
9 K-a-t-h-e-r-i-n-e, last name Pavlik, P-a-v-l-i-k.

10 MS. MARKS: And are you representing an  
11 organization, Kathy?

12 KATHERINE PAVLIK: I work for Michigan  
13 College of Beauty in Troy, Michigan.

14 MS. MARKS: Thank you. Go ahead with  
15 your comments.

16 KATHERINE PAVLIK: Okay. Let me get them  
17 ready, I didn't think we were going to do them this  
18 quick.

19 So my first -- some of mine are  
20 clarifications and then some of them are comments or  
21 concerns on the actual rule. So my first one is on page  
22 2, Rule No. 338.2171a. It states that we have to -- let  
23 me see, read it here exactly. It says, it talks about  
24 the grade level, but it doesn't state what grade level,  
25 the requirement, where before we used to have a ninth

1 grade education grade level, this doesn't specify. So  
2 I'm just clarifying, is that still the case?

3 MS. MARKS: We'll take a look at that,  
4 Kathy. Thank you for your comment. You can go ahead.

5 KATHERINE PAVLIK: Okay. The second one  
6 is also on page 2, it's Rule 338.2171a, minimum practical  
7 applications has been removed as a definition. And I do  
8 agree with the practical hours needing to be in there as  
9 a definition, however, we still have to have minimum  
10 practical applications in the curriculum grid, so  
11 therefore I think we still need to have a definition of  
12 what minimum practical applications are. I know that  
13 they tried to take them out because they tried to remove  
14 minimum practical applications from the grid, but it  
15 stayed, so I think the definition needs to stay.

16 MS. PRZYBYLO: This is Kerry Przybylo  
17 speaking. Kathy, did you have any further comments?

18 KATHERINE PAVLIK: Yes. I was waiting  
19 for a response that you guys were comfortable with --

20 MS. PRZYBYLO: We don't respond. This is  
21 just our time to --

22 (Multiple speakers.)

23 KATHERINE PAVLIK: Okay. So I'll just  
24 keep rolling then. Okay. I'm sorry. I misunderstood.  
25 So I have a lot.

1                   On page 3, Rule No. R 338.2121a, just  
2                   again for clarification purposes, I know that we're going  
3                   with the new NBCP examination, I was just wondering if we  
4                   could get clarification as to when bulletins and  
5                   information would be available for schools to get the  
6                   students prepared, and if there would be a meeting or a  
7                   training on that for the schools.

8                   And then on page 7, Rule 338.2180(10)(b),  
9                   again on page 7, I had a question or for some  
10                  clarification. It talks about the, not having branch  
11                  facilities anymore but each school having its own  
12                  individual license and that each instructor working for  
13                  the school has to have their license hung in the separate  
14                  premise location. Would the e-mailed copy that we  
15                  receive when we get our license, would that be accepted,  
16                  or would we have to have an actual -- purchase a new  
17                  license for each building? So again, clarification on  
18                  that.

19                  I did have page 9, but page 9 again is  
20                  just the removal of the minimum practical applications.  
21                  And so on Rule 338.2136(2)(b), I think that we need to  
22                  put the minimum practical applications in there as well  
23                  when we're transferring students' training hours and  
24                  practical hours, that we should be transferring their  
25                  applications as well since they are part of the

1 curriculum still.

2 Now on page 10, Rule 338.2139, Rule  
3 39(1), there's no longer a passing score requirement like  
4 specified, before it used to be a student had to pass  
5 with a 75 percent or above, it just states that we have  
6 to pass with a passing score. So is it up to the school  
7 to determine the passing score? Are we going to follow  
8 the passing score of the NBCP examination when we get  
9 that? So again, more clarification, it's not very clear  
10 as to what the new passing score should be.

11 And then page 24 through 26 is where we  
12 have the biggest concern, and it's the cosmetology table  
13 for the curriculum, and I can e-mail you a copy of what I  
14 typed out as well because it might be a little bit more  
15 helpful. But the concern is -- there's a lot of concerns  
16 with the curriculum. So first and foremost, the theory  
17 hours, the way it's broken down now, the students in  
18 section (a), the health and safety related to skin care  
19 and then it goes into anatomy, chemistry, diseases,  
20 disorders, laws and rules, occupational safety,  
21 professional hygiene, sanitation equipment, all of that  
22 is now only 75 hours, whereas before it was 155. And so  
23 for that much sanitation and infection control and  
24 diseases and disorders, I don't think that that's  
25 sufficient theory hours, especially when we're also

1 having to train in, more in depth in manicuring and  
2 aesthetics in those categories as well. But more  
3 concerning is when we take a look at part (b), (c), and  
4 (d) with the theory and practical hours, so when we break  
5 it down -- let me take a look at my math here. When we  
6 break it down, the cosmetology students' practical  
7 hours -- oh, and I do believe that the 125 is too much in  
8 the sanitation.

9           But moving on, if we look into the hair  
10 services, they receive 600 hours in practical hours and  
11 425 minimum practical applications to be completed within  
12 that 600 hours; so if we were to do the math on that, we  
13 are giving the student an hour, 1 hour .41, so not quite  
14 an hour and a half to perform. If we look at the  
15 categories, they have 15 topics, so if we were just to  
16 take those 15 topics, we are giving them about just less  
17 than an hour and a half to perform one of those, and as a  
18 cosmetologist, a hair color service alone could take  
19 upwards to 2, 3, 6 hours; whereas if we looked at the  
20 aesthetics or the manicuring services, they have 150  
21 practical hours to perform 25 services, that's giving  
22 them approximately 6 hours per task to do, and we're only  
23 looking at 4 tasks in aesthetics and 3 tasks in  
24 manicuring. So I really think that the table is  
25 overweighted in practical and theory for aesthetics and

1 skin care -- I'm sorry -- skin care services and  
2 manicuring services and not heavily weighted enough in  
3 hair services. Does that make sense, what I'm trying  
4 explain?

5 And it also falls true when we're looking  
6 at the theory portion of it. So if we were to look at  
7 the theory portion of it, in hair -- in nail services  
8 anesthetic services, the theory portion, we're giving  
9 them 20 hours per topic in manicuring services of theory  
10 and we're giving them 16.66 hours per topic in theory and  
11 aesthetics, but they're only receiving 8 hours per topic  
12 in theory -- I'm sorry, not 8 -- 15 hours in theory. Let  
13 me double check my note here, I'm making an error, I know  
14 I am. Yes, 15 hours in cosmetology services. So again,  
15 it's just, I think that what we were trying to do was get  
16 them more training in skin and nails, which I agree with,  
17 however, now we've tipped the scale so much into nails  
18 and manicuring and not enough into cosmetology services.

19 And also, when we look at the textbook  
20 support that's offered, we have Pivot Point or Milady as  
21 our training books that are accepted by the State. If  
22 you were to look at those, they're only giving us like 37  
23 hours in skin and 34-35 hours in nails. Unfortunately,  
24 what is the school to do? They're going to have to  
25 purchase a cosmetology, a manicuring, and an aesthetics

1 book and pass that cost down to the students, which a  
2 majority of the students in the cosmetology program don't  
3 have that much desire in skin and nails, they'd rather  
4 learn more about the trendy hair services, the cutting  
5 and the colors and things of that nature. So I just  
6 think that we need to take a more thorough look at those  
7 grids and those curriculums because it's too heavily  
8 weighted in the nails and in the manicuring and not  
9 enough in the hair services. So I think that's pretty  
10 much it on the grid.

11           And then moving on from the curriculum,  
12 on page 71 -- I'm sorry -- 33, it's Rule 71(e) on page  
13 33. There's a new statement here that states, and I'm  
14 not really clear on it, "The manufacturer-labeled  
15 container of each disinfectant and sterilant that is  
16 used." I'm not really sure what that means. Are they  
17 requiring that we use the disinfectant in the  
18 manufacturer-labeled bottle? I'm not really sure what  
19 you're asking for. And if that's the case, what is  
20 schools and salons supposed to do that purchase it in  
21 gallons and then dilute it down and put it into a  
22 separate disinfecting bottle? So I just, again, more  
23 clarification there because that's kind of confusing.

24           And then on page 34, again, Rule No.  
25 71(1)(b)(i), it states manicuring -- so it talks about

1 having to disinfect tools in a covered container that's  
2 fully submerged. Does that now change the requirement  
3 for manicuring tools? So prior to this rule, in most  
4 states and most salons and schools used a jar where the  
5 working surface of the tool is submerged into the  
6 disinfectant and a good part of the handle is out of the  
7 jar; so would those no longer be allowed, or would we  
8 have to switch our disinfection container? What is the  
9 detailed specific protocol for disinfecting manicuring  
10 schools?

11 And then I just have two more. Page 34  
12 still, Rule 71a(4), it states that we have to now launder  
13 towels, neck strips, and capes in a detergent with hot  
14 water up to 160 degrees Fahrenheit for not less than  
15 24 -- 25 minutes in a wash and rinse cycle. I mean I'm  
16 not that young, my washing machine at home and my washing  
17 machine at work doesn't state in temperature 160 degrees,  
18 so I just want clarification as to how do we determine  
19 that we're using that water temperature if the state  
20 board inspector was to come in, what are they going to do  
21 to check this, what do we need to do on our end to make  
22 sure that we're not in default or problem with that?

23 And then my last one is on page 35,  
24 71b(b), and it talks about sanitizing hands. I think  
25 that the cosmetology or hair services should be included

1 in that statement. I agree that we should sanitize our  
2 hands with electrology, manicuring, and skin care, but  
3 why not cosmetology hair services; especially in the day  
4 of COVID right now, I definitely think we need to add  
5 hair services to that as well. And that's all my  
6 concerns.

7 MS. MARKS: Thank you, Kathy.

8 KATHERINE PAVLIK: Thank you.

9 MS. MARKS: Are there any other comments  
10 from those attending by video? Again, please use the  
11 "Raise Your Hand" function. Comments about the  
12 Cosmetology Rules? I'm not seeing any others.

13 Let's move on to those attending by  
14 phone. If there's anyone attending by phone who would  
15 like to make a comment about the Cosmetology Rules, hit  
16 \*6, it will unmute your phone, and you may add your  
17 comment to the record.

18 MS. PRZYBYLO: I don't see comments,  
19 Dena. Oh, there's -- hold on one second. The person  
20 whose number ends in 8230, did you have a comment?

21 CHAKAKHAN HILL: Actually, I just wanted  
22 to confirm that I accepted the invitation to attend.

23 MS. PRZYBYLO: Okay. Hold on one second,  
24 please. Could you please first identify yourself for our  
25 court reporter.

1 CHAKAKHAN HILL: Yes. Chakakhan Hill,  
2 first name spelled C-h-a-k-a-k-h-a-n, last name Hill,  
3 H-i-l-l.

4 MS. PRZYBYLO: And what was your comment,  
5 Ms. Hill?

6 CHAKAKHAN HILL: I confirm accepting  
7 invitation to attend this General Rules - Cosmetology  
8 hearing because I am a licensed cosmetologist, and that's  
9 all.

10 MS. PRZYBYLO: All right. Thank you.

11 MS. MARKS: Okay. If there are no other  
12 comments on the Cosmetology - General Rules. Is there  
13 anyone here who wishes to make comments on the Pharmacy -  
14 Animal Euthanasia and Sedation Rules? If so and you're  
15 attending by video, please use the "Raise Your Hand"  
16 function and we will call on you to make those comments  
17 now. I'm not seeing any, are you, Kerry?

18 MS. PRZYBYLO: No.

19 MS. MARKS: If you are phoning in and  
20 would like to make a comment on the Pharmacy - Animal  
21 Euthanasia and Sedation Rules, please hit \*6, and you may  
22 add your comment to the record at this time.

23 MS. PRZYBYLO: Cathy Anderson has a  
24 comment.

25 MS. MARKS: Thank you. Go ahead, Cathy.

1 Can you unmute yourself, Cathy?

2 CATHY ANDERSON: Sorry about that. Hi.

3 MS. MARKS: That's okay. First and last  
4 name with spelling, and identify any organization you're  
5 representing, please.

6 KATHERINE PAVLIK: Absolutely. I am  
7 Dr. Cathy Anderson, C-a-t-h-y, Anderson, A-n-d-e-r-s-o-n,  
8 and I am speaking on behalf of the MVMA, Michigan  
9 Veterinary Medical Association. Thank you.

10 I wanted to briefly introduce myself and  
11 tell you why I'm on this call. I am a shelter  
12 veterinarian, you probably hear my patients in the  
13 background; I am also an instructor for shelter personnel  
14 in the state-required euthanasia by injection course, as  
15 well as the chemical immobilization course, so I do offer  
16 instruction in both of those courses that are impacted by  
17 this proposed rule change. And as I've said, I'm also  
18 the, a member of the Michigan Veterinary Medical  
19 Association, and am indeed the chairperson of the  
20 legislative advisory committee for that group.

21 We were one of the stakeholders involved  
22 in the drafting of the original House Bill that went  
23 through and subsequently became part of the Public Health  
24 Code, and it was our group, which included Michigan  
25 Department of Ag, Michigan Humane, Michigan Association

Penn Reporting, LLC - lori.penn@yahoo.com

1 of Animal Control Officers, that brought forth that law  
2 change.

3 I am representing the MVMA and would like  
4 to say thank you so much for all the work you've done on  
5 drafting the rules surrounding this amendment, but I do  
6 want to ask that, respectfully, that you all review a  
7 letter that we have already sent in with some proposed  
8 changes to the language that, with the current draft that  
9 you have put forward. We are hoping that you will  
10 consider the edits we have suggested prior to formally  
11 submitting the draft of these rules. And that's all I  
12 have to say. Thank you.

13 MS. MARKS: Thank you.

14 MS. PRZYBYLO: Thank you, Dr. Anderson.

15 MS. MARKS: Are there any other comments  
16 concerning the Pharmacy - Animal Euthanasia and Sedation  
17 Rules?

18 MS. PRZYBYLO: Shirene Cece, is her hand  
19 raised?

20 SHIRENE CECE-CLEMENTS: Yes. I am  
21 Shirene Cece-Clements, so S-h-i-r-e-n-e C-e-c-e hyphen  
22 C-l-e-m-e-n-t-s. I am a veterinarian with Michigan  
23 Human, I'm also a member of the MVMA.

24 And so I would just like to -- I'm also  
25 an instructor for the euthanasia training in the State of  
Penn Reporting, LLC - lori.penn@yahoo.com

1 Michigan, and I would just like to put my support behind  
2 what Cathy -- Dr. Anderson has already said, and hopeful  
3 that you will look at our changes and hope that you will  
4 address those and see that they're making improvements.  
5 So that's all I need to say. Thank you very much for  
6 your time.

7 MS. MARKS: Thank you. Are there any  
8 other attending by video who would like to make comments  
9 concerning the Pharmacy - Animal Euthanasia and Sedation  
10 Rules? Not seeing any.

11 Again, if you are attending by phone and  
12 would like to make comments about those Rules, hit \*6,  
13 and that will unmute your phone and you may speak at this  
14 time.

15 MS. PRZYBYLO: I think we can move on,  
16 Dena.

17 MS. MARKS: All right. If there are no  
18 further comments on that rule set --

19 SHIRENE CECE-CLEMENTS: Well, that wasn't  
20 as painful as I thought. Never been to one of these  
21 before, so.

22 MS. MARKS: Is there anyone who would  
23 like to make comments on the Podiatric Medicine and  
24 Surgery - General Rules? If you are attending by video,  
25 please use the "Raise Your Hand" function. I see two

1 people. Derek Dalling, would you like to make comments  
2 at this time?

3 DEREK DALLING: Yes, thank you. Good  
4 morning.

5 MS. MARKS: Good morning.

6 DEREK DALLING: Derek Dalling, D-e-r-e-k,  
7 last name D-a-l-l-i-n-g. Just want to quickly -- oh, on  
8 behalf of the Michigan Podiatric Medical Association, by  
9 the way.

10 Wanted to just thank the Department staff  
11 for work on these rules, we greatly appreciate all of  
12 you, especially amending the rules that were some recent  
13 changes. Those most recent changes will help podiatric  
14 residents from around the country be able to come to our  
15 state, practice legally. In light of some changes from  
16 the COVID pandemic, one of their exams was not allowed,  
17 and these rule changes will allow them to practice here  
18 without any interference. So we greatly appreciate that  
19 rule change and greatly appreciate all the Department  
20 staff's help for making those changes for us. Thank you.

21 MS. MARKS: Thank you for your comments.  
22 Stacey Hettiger.

23 STACEY HETTIGER: Good morning. Thank  
24 you so much for the opportunity to speak. My name is  
25 Stacey Hettiger, I'm the senior director of Medical and  
Penn Reporting, LLC - lori.penn@yahoo.com

1 Regulatory Policy at the Michigan State Medical Society.  
2 First name is spelled S-t-a-c-e-y, last name is  
3 H-e-t-t-i-g-e-r.

4 And I just wanted to bring to your  
5 attention and request an amendment to the Podiatry Rules.  
6 As Derek Dalling mentioned, there was a situation as a  
7 result of the pandemic where the National Board of  
8 Podiatric Medical Examiners voted not to do the component  
9 of the Part 2 examination, and because of that decision,  
10 there really is no opportunity for those residents to  
11 take the exam, and so no opportunity to have a passing  
12 score to provide to LARA. So we are asking that the  
13 rules be amended, specifically Rule 104, subsections (2)  
14 and (3), to provide a waiver for the class of 2021, as  
15 well as any potential future classes where the exam might  
16 not be provided. We have also submitted those comments  
17 in writing with more detail. So thank you so much, and  
18 have a nice day.

19 MS. MARKS: Thank you. Are there any  
20 other participants attending by video who would like to  
21 make comments about the Podiatric Medicine Rules? I'm  
22 not seeing any others.

23 Again, if you are attending by phone and  
24 would like to make comments about that rule set, please  
25 hit \*6, and you may add your comments at this time.

Penn Reporting, LLC - lori.penn@yahoo.com

1                   If there are no other persons who wish to  
2 speak at this time, we are going to take a ten-minute  
3 break to allow anyone else who would like to join and  
4 make comments about any of those three rule sets today to  
5 do so at that time. So we are on recess for ten minutes.  
6 Thank you.

7                   (At 9:29 a.m., there was a ten-minute recess.)

8                   MS. MARKS: We will go back on the  
9 record. Are there any other comments about any of the  
10 three rule sets? Again, if you're attending by video,  
11 please use the "Raise Your Hand" function; if you are  
12 attending by phone, please hit \*6 to unmute yourself to  
13 speak.

14                   If there are no further comments at this  
15 time, I hereby declare the hearing closed. The record  
16 will remain open until today at 5:00 p.m. for any other  
17 comments you may wish to share about the proposed rules.  
18 Thank you for attending today's hearing.

19                   (At 9:40 a.m., the public hearing concluded.)

20                   - - -

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

C E R T I F I C A T E

I, Lori Anne Penn, do hereby certify that I reported in stenotype via Zoom Teleconference the proceedings had in the within-entitled matter, that being Cosmetology - General Rules (MOAHR #2020-50 LR), Pharmacy - Animal Euthanasia and Sedation Rules (MOAHR #2019-86 LR), and Podiatric Medicine and Surgery - General Rules (MOAHR #2020-24 LR), Dena Marks, hearing facilitator for the Department of Licensing and Regulatory Affairs, Bureau of Professional Licensing, Lansing, Michigan, on Monday, May 17, 2021; and do further certify that the foregoing transcript, consisting of 22, is a true and correct transcript of my stenotype notes.

*Lori Anne Penn*

---

Lori Anne Penn, CSR-1315  
Penn Reporting, LLC  
lori.penn@yahoo.com

Dated: **May 18, 2021**