

## **BOMATS Request for Changes to the Michigan Athletic Training General Rules**

My name is Matthew Hambleton, and I am the Michigan Athletic Trainer's Society Governmental Affairs Committee Chair. The intent of this letter is to issue a public comment regarding a proposal of alternative options to address the Athletic Training General Rules and the continuing education (CEU) requirements for maintaining a Michigan athletic trainer (AT) license.

Previously I have submitted in writing a request to change the license renewal requirements for ATs from having to complete 75 CEUs within a 3-year renewal cycle to simply having to show proof of being current with the Board of Certification (or BOC) national standards. The BOC requires 50 CEUs within a 2-year renewal cycle in order to maintain the national ATC certification credential. Both the Michigan licensing requirements and the national BOC certification requirements indicate needing to acquire an average of 25 CEUs per year. For ATs who choose to maintain both sets of credentials it poses a certain challenge.

Under these circumstances, ATs must be careful and plan to receive no more than 25 CEUs per year depending on the reporting cycle. This can be challenging depending on what CEU opportunities that may present each year.

So long as the AT receives no more or no less than 25 CEUs each year then there is not any foreseen issues. However, if the AT earns an excessive amount of CEUs in one year, it could cause the AT to then need to earn more CEUs in a subsequent year, and therefore create the need for additional coursework as well as increase their financial burden. (See Appendix for an example of a potential scenario).

Allowing for this proposed standard, there would still be the result of the AT earning an average of 25 CEUs per year, but it would also eliminate the challenges in complying with both the State and the National requirements.

This proposal would also be in compliance with the recent State law, Public Act 19 of 2020. This ACT states, "the rules must adopt, by reference, the continuing education standards for athletic trainers issued by the Board of Certification, Inc. that are in existence on the effective date" ... And that "The department may incorporate by reference, in whole or in part, existing standards in the rules."

In addition, the Act states that "The department, in consultation with the board, shall promulgate rules to require licensees seeking renewal to furnish evidence acceptable to the department and the board of the successful completion, during the preceding license cycle, of those continuing education requirements."

It is not unreasonable to say that "acceptable evidence" would include the licensee simply having to show proof that they have met the national standards of the BOC since they too require 25 CEUs per year. The idea is that if an AT that can show proof that they are in good standing with the BOC requirements then they must also be in good standing with the Michigan licensing requirements.

A second, and more preferable proposal, would simply be to lower the number of CEUs required to maintain the Michigan athletic training license. After analyzing the requirements for all of the other licensed health professionals in Michigan, it is apparent that the requirements for maintaining an athletic training license is set at a far higher standard than it is for the other licensed health professionals in Michigan. With the exception physicians, ATs require about 10 to 15 more CEUs per year than any other health profession. See here for examples:

HEALTH PROFESSION	REQUIRED NUMBER of CEUs / YEAR
Acupuncturist	15
<b>Athletic Trainer</b>	<b>25</b>
Audiologist	10
Chiropractor	15
Dental Hygienist	12
Dentist	20
<b>Medical Doctor</b>	<b>50</b>
Nurse RN	12.5
Nursing Home Administrator	18
Occupational Therapist	10
Optometrist	20
<b>Osteopathic Medicine and Surgery</b>	<b>50</b>
Pharmacist	15
Physical Therapist	12
Physician's Assistant	0
<b>Podiatrist</b>	<b>50</b>
Psychology (Full Doctoral)	15
Social Worker Masters (LMSW)	15
Speech Language Pathologist	10

With the new knowledge of this information, I am proposing to reduce the number of CEUs required for ATs from 25 CEUs per year to 15 CEUs per year. This could be implemented with a requirement of 30 CEUs within a 2-year renewal cycle. This standard would also be supported by Public Act 19 of 2020 of which accomplished the following actions:

- Deletes a requirement that LARA issue an athletic trainer license for a three-year license cycle. And it also
- Deletes a 75-clock-hour continuing education requirement for athletic trainers.

Adopting this second proposal would be preferable since it would affect all ATs, and not just those who choose to maintain both their state of Michigan license and their national BOC certification credentials. In addition, this high CEU requirement appears to be an unreasonably excessive standard in comparison to what is required of nearly all the other licensed health professionals in the state.



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**Appendix: Example of Potential Scenario (also refer to chart below)**

There is an AT that has earned 25 CEUs for the first year of the BOC renewal cycle, and in the second year they have already earned 5 CEUs. However, the AT then receives an opportunity to attend, and to speak at, the annual GLATA conference. This conference offers up to 20 CEUs, and this individual will also receive another 10 CEUs for speaking. This means, that for the second year they would then earn 35 CEUs for a total of 60 CEUs for the renewal period. It is understood that this could be an issue regardless of the Michigan license renewal standards, but there is now a potential carry-over effect.

This same year where the AT earned 35 CEUs is the second year of the BOC cycle, but it is also the first year of the Michigan license cycle. These 35 CEUs may be applied to the first year of this Michigan licensing cycle. During the next cycle, the BOC and the Michigan licensing renewal cycles will end in the same year.

The problem is that in the next two years, the AT will need to earn 50 CEUs in order to maintain their BOC certification, but they will only need to earn 40 CEUs in order to maintain their Michigan license. The AT is now forced to earn an extra 10 CEUs that are applicable to the license in order to comply with the BOC standard requirements. The AT will have then earned 85 CEUs during the 3-year Michigan licensing cycle when only 75 CEUs are needed.

The AT is faced with the dilemma of either having to choose to deny themselves the opportunity to attend the GLATA conference, or they will have to pay out more money than they should need to in order to pay for the extra 10 CEUs that they need for their BOC certification, but that they do not need in order to maintain their Michigan license. For these individuals that choose to maintain both credentials, it makes sense that they should simply need to have to show proof that they are up to date and current with the BOC certification standards in order to alleviate these potential financial burdens.

POTENTIAL SCENARIOS		BOC REQUIREMENTS		MI LICENSE REQUIREMENTS		EXAMPLES / NOTES
YEAR	Example CEUs Earned	BOC DUE	BOC TOTAL CEUS	MI LICENSE DUE	MI LICENSE TOTAL CEUs	
2024	25		25		25	
2025	25	50	50		50	
2026	25		25	75	75	
2027	35	50	60		35	Already earned 5 CEUs. Invited to speak at GLATA = 30 CEUs. Overpaid by 10 CEUs
2028	25		25		60	
2029	25	50	50	75	85	Overpaid by 10 CEUs

## **REFERENCES**

Administrative Rule:

<https://ars.apps.lara.state.mi.us/AdminCode/DeptBureauAdminCode?Department=Licensing%20and%20Regulatory%20Affairs&Bureau=Bureau%20of%20Professional%20Licensing>

MCL 333.16104 (Public Health Code):

[http://www.legislature.mi.gov/\(S\(hmppyldlidi4splng5gceqh\)\)/mileg.aspx?page=getObject&objectName=mcl-333-16104](http://www.legislature.mi.gov/(S(hmppyldlidi4splng5gceqh))/mileg.aspx?page=getObject&objectName=mcl-333-16104)

MCL 333.17901 (Public Health Code):

[http://www.legislature.mi.gov/\(S\(ehokqwf5gszmwubq4kteukve\)\)/mileg.aspx?page=getObject&objectName=mcl-333-17901](http://www.legislature.mi.gov/(S(ehokqwf5gszmwubq4kteukve))/mileg.aspx?page=getObject&objectName=mcl-333-17901)

Public Act 19 of 2020:

<http://legislature.mi.gov/documents/2019-2020/publicact/pdf/2020-PA-0019.pdf>

Senate Bill (Public Act 19) of 2020 Legislative Analysis

<http://legislature.mi.gov/documents/2019-2020/billanalysis/Senate/pdf/2019-SFA-0184-U.pdf>