

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Registered Sanitarian comments Rule 2019-103 LR  
**Date:** Thursday, May 21, 2020 8:47:34 AM

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**From:** Scott Johnston <S.Johnston@nwhealth.org>  
**Sent:** Thursday, May 21, 2020 8:47 AM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Cc:** Scott Johnston <S.Johnston@nwhealth.org>  
**Subject:** Registered Sanitarian comments Rule 2019-103 LR

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I would like to comment on the Department of Licensing and Regulatory Affairs  
Bureau of Professional Licensing

Administrative Rules for Sanitarians Registration- General Rules

Rule Set 2019-103 LR

The changes/clarifications look good EXCEPT in being equivalent or reciprocal to the NEHA credentials. I feel the State of Michigan should require , as NEHA and every other state does, that a licensed RS holders receive and submit 24 continuing education credits for the two year credential period. As it stands now you pay your fee and your good to go whereas, NEHA and other registrations require the education credits to keep up with current events and changing times for each renewal period.

Scott Johnston, REHS  
Health Department of Northwest Michigan  
95 Livingston Blvd.  
Gaylord, MI 49735  
989-350-4636

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**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Sanitarians Public Hearing and Open Comment Period  
**Date:** Tuesday, May 26, 2020 8:05:19 AM  
**Attachments:** [image001.png](#)

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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](mailto:BPL-BoardSupport@michigan.gov)



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**From:** Regina Young <[reginagyoung@gmail.com](mailto:reginagyoung@gmail.com)>  
**Sent:** Friday, May 22, 2020 10:27 AM  
**To:** BPL-BoardSupport <[BPL-BoardSupport@michigan.gov](mailto:BPL-BoardSupport@michigan.gov)>  
**Subject:** Re: Sanitarians Public Hearing and Open Comment Period

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Greetings,

Please confirm receipt of this email.

During the public hearing today, I provided comment regarding Registered Sanitarian Rules revisions. My public comment is to pose whether the change(s) will have any impact on state guidance documents and rules that adopt and/or use the Registered Sanitarian credential within them. The purpose of this email is to provide additional citation for my question.

Registered Sanitarian credential is referenced in the following:

1. The Land Division Act: <http://www.legislature.mi.gov/documents/mcl/pdf/mcl-Act-288-of-1967.pdf>, 560.105 (g)
2. Administrative Rules Part 4. Department of Environmental Quality On-site Water Supply and Sewage Disposal Rules for Land Divisions and Subdivisions, and adopted by reference in the Condominium Act 59 of 1978, 559.171 (a). (Available at: [https://www.michigan.gov/documents/deq/deq-wb-dwehs-ows-subdivision\\_rules\\_241122\\_7.pdf](https://www.michigan.gov/documents/deq/deq-wb-dwehs-ows-subdivision_rules_241122_7.pdf) ) Specifically: R560.401 Definitions, Rule 401 (x) Registered Sanitarian, Rule 560.417 Soil Absorption area for conventional treatment and disposal systems. Rule 417 (2)(c), Rule 418 (2)(c), Rule 420 (1)(c), Rule 421 (4)(c), Rule 421(5)(c), Rule 422 (5) (c) and Rule 423(2)(c).
3. The Michigan Criteria for Subsurface Sewage Disposal (MCSSD), April 1994, II. Definitions G., III Site Review Process A (Available at: [https://www.michigan.gov/documents/deq/deq-wb-dwehs-ows-mcssd\\_241120\\_7.pdf](https://www.michigan.gov/documents/deq/deq-wb-dwehs-ows-mcssd_241120_7.pdf) )
4. The MCSSD are adopted in the Part 22 Rules of Part 31, NREPA 451 of 1994 (Available at: [https://www.michigan.gov/egle/0,9429,7-135-3313\\_4117-9765--,00.html](https://www.michigan.gov/egle/0,9429,7-135-3313_4117-9765--,00.html) ) Specifically: R323.2210(a)(i) and in many locations of the Part 22 Rules thereafter.

Please consider the impact of the Sanitarian Registration Rules changes to these rules.

As an additional comment relative to the Registered Sanitarian-General rules revisions proposed I will add that as a currently registered sanitarian in good standing I achieved by R.S. after serving Michigan's then requirements for experience, education, and completion of an examination. My bachelors degree is from a then accredited Environmental Health program from Ferris State University. That program was dropped by FSU. I intend to keep my RS current; however, one never knows if extreme illness or other life challenge could result in me missing my next renewal. With this in mind my comment is essentially relative to grandfathering and relief of any burden of proof to re-register within a three year time period and requiring fingerprinting. I don't recall being finger printed before but if I was the prints on my right hand would likely not match. I had a blender accident that cut my right index, middle, and ring fingers but they healed. I would not want any comparative finger prints to prohibit my renewal.

Lastly, I have 32 plus years and ongoing practice as a sanitarian. I passed the state RS examination, attained a bachelor's degree in Industrial and Environmental Health Management. from an accredited Environmental Health program at Ferris State College. It seems to me that the rules revisions could grant more than 3 years for renewals or grant relief from the burden of proof of education, and experience AND the expense of obtaining third party verification of information that the state could easily through electronic servers store for more than 3 years. I would suggest a longer period for renewal and/or ability to waive verification when adequate documentation is on file (for longer period) with the State. I am thinking of the younger professionals with an RS who could become ill, fight a long health battle, lapse renewal for more than 3 years and then meet a burden to re-credential in order to perform work as identified in the rules and guidance documents

above.

Thank you for your consideration in this regard,

Regina Young R.S.  
3820 Mountain Ridge Dr.  
Freeport MI 49325  
[REDACTED]

Please don't release my personal identifying information or health related information in an FOIA requests. Redaction requested.

On Thu, May 21, 2020 at 3:30 PM Regina Young <[reginagyoung@gmail.com](mailto:reginagyoung@gmail.com)> wrote:

Greetings,

I would like to speak with an analyst prior to the hearing scheduled for tomorrow. My Registration license number is 6701000928. I have questions regarding administrative procedures of these rules changes, the impact to me and others like me who are State Registered Sanitarians (NOT NEHA R.E.H. S.), and the impact of these changes for requirements as reference in the Michigan Criteria for Subsurface Sewage Disposal as adopted in part 31, PA 451, 1994 and/or other state rules.

I was not provided notice of this pending hearing until my state association sent me an email.

I've reviewed the 2019 Committee Meeting Minutes and version of the rules at that time to the current ones and there are changes since 2019 workgroup.

I work for the EGLE, State of Michigan as an Environmental Quality Analyst. Attending a Hearing with such short notice is problematic at best.

**PLEASE contact me at [REDACTED] today if at all possible.**

Sincerely,

Regina Gayle Young  
3820 Mountain Ridge Dr.  
Freeport, MI 49325  
[REDACTED]

----- Forwarded message -----

From: **Regina Young** <[reginagyoung@gmail.com](mailto:reginagyoung@gmail.com)>

Date: Thu, May 21, 2020, 1:42 PM

Subject: Fwd: Sanitarians Public Hearing and Open Comment Period

To: <[BPLHelp@michigan.gov](mailto:BPLHelp@michigan.gov)>

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Sincerely,

Regina Gayle Young  
3820 Mountain Ridge Dr.  
Freeport, MI 49325  
[REDACTED]

----- Forwarded message -----

From: **Michigan Environmental Health Association** <[donotreply@meha.net](mailto:donotreply@meha.net)>

Date: Wed, May 20, 2020 at 4:30 PM

Subject: Sanitarians Public Hearing and Open Comment Period

To: Regina Young <[reginayoung@gmail.com](mailto:reginayoung@gmail.com)>



Sanitarians Public Hearing and Open Comment Period



**Hello Regina,**

This email is for anyone that holds a Registered Sanitarian (R.S.) credential in Michigan.

Michigan Department of Licensing and Regulatory Affairs Bureau of Professional Licensing has scheduled a public hearing to review the proposed revised Sanitarians' administrative rules.

This will take place on Friday, May 22, 2020. Below is a link to the Notice of Public Hearing and the latest draft of the proposed revised rules. The hearing is your opportunity to voice any comments or concerns regarding the revisions.

Hope everyone is doing well!

MEHA Board

[Notice of Public Hearing](#)

[Proposed Rule Revisions](#)

MEHA, P.O. Box 13276, Lansing, MI 48901 517-485-9033

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**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Sanitarians Public Hearing and Open Comment Period  
**Date:** Tuesday, May 26, 2020 8:01:42 AM  
**Attachments:** [image001.png](#)

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I'm sorry this wasn't forwarded to you but I was off Thursday afternoon and my furlough day is Friday. I'm not sure if you were able to speak to this person.

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](mailto:BPL-BoardSupport@michigan.gov)



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**Sent:** Thursday, May 21, 2020 3:30 PM  
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Sincerely,

Regina Gayle Young  
3820 Mountain Ridge Dr.  
Freeport, MI 49325  
[REDACTED]

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To: <[BPLHelp@michigan.gov](mailto:BPLHelp@michigan.gov)>

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3820 Mountain Ridge Dr.  
Freeport, MI 49325  
[REDACTED]

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From: **Michigan Environmental Health Association** <[donotreply@meha.net](mailto:donotreply@meha.net)>

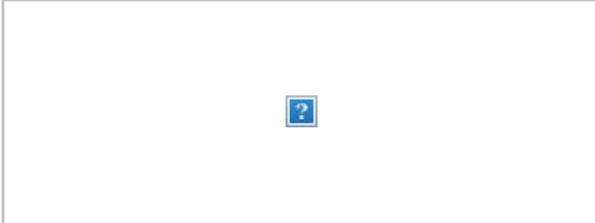
Date: Wed, May 20, 2020 at 4:30 PM

Subject: Sanitarians Public Hearing and Open Comment Period

To: Regina Young <[reginagyoung@gmail.com](mailto:reginagyoung@gmail.com)>



## Sanitarians Public Hearing and Open Comment Period



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Hope everyone is doing well!

MEHA Board

[Notice of Public Hearing](#)

[Proposed Rule Revisions](#)

MEHA, P.O. Box 13276, Lansing, MI 48901 517-485-9033

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# Michigan Association of Local Environmental Health Administrators MALEHA

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*Representing Local Environmental Public Health Departments in Michigan*

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May 21, 2020

### **President**

Matt Bolang  
Livingston County  
(517) 552 6870

Wes MacIntosh  
Senior Policy Analyst  
Michigan Department of Licensing and Regulatory Affairs  
Bureau of Professional Licensing - Boards and Committees Section  
P.O. Box 30670  
Lansing, MI 48909

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Macomb County  
(586) 466 4135

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(810) 245 5791

Kevin Green (2022)  
Calhoun County  
(269) 969 6398

Dan Thorell (2022)  
Grand Traverse County  
(231) 995 6021

Dear Mr. MacIntosh:

As you are aware, the Michigan Association of Local Environmental Health Administrators (MALEHA) represents the environmental health divisions of all 45 Local Health Departments (LHDs) in Michigan. We are an organization of leaders that promote and strengthen all facets of environmental health, including food safety, drinking water, wastewater, recreational water and air quality.

Local Health Departments are the main employer of environmental health professionals in Michigan who hold either the Registered Sanitarian (RS) credential through Michigan and/or the Registered Environmental Health Specialist (REHS) credential through the National Environmental Health Association (NEHA). As such, we have a vested interest in the current rule revision LARA is proposing for the Registered Sanitarian.

Thank you for the opportunity to provide initial comments (July 2019). As an organization we are pleased that the revised Administration Rules have incorporated these comments and suggestions, most notably aligning with the requirements for the NEHA REHS credential.

One potential concern for MALEHA is that there does not appear to be a clear indication in the revised rules whether or not those individuals that currently hold the Michigan RS would be grandfathered under the revised rules when renewing their registration. It is our preference for language to be included to make it clear that those currently holding the Michigan RS would not be required to meet the revised standards at the time of renewal and that these revisions would only apply for those registered from the date of adoption of these revisions forward.

I included some suggested clarifying language in the section below (in red).

*R 338.3931 Registration renewal; requirements.*

*Rule 31. An applicant for registration renewal who has been registered for the 2-year period immediately preceding the application for renewal shall submit to the department the required fee and a completed application on a form provided by the department. Upon the effective date of these rules, anyone currently holding the*



# Michigan Association of Local Environmental Health Administrators MALEHA

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*Representing Local Environmental Public Health Departments in Michigan*

*Michigan Registered Sanitarian (R.S.) credential is considered to have met the education training requirements at the time of registration, notwithstanding R388.3913 (1) through (4), and a currently held R.S is a registration that is approved by the department and eligible for renewal under this rule.*

Separate of this one concern, MALEHA supports the proposed changes to the Administration Rule regarding the Sanitarian Registration. Please contact me at 517-552-6870 or [mbolang@livgov.com](mailto:mbolang@livgov.com) if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Matt Bolang".

Matt Bolang  
MALEHA President

**From:** [Matt Bolang](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Cc:** [BPL-BoardSupport](#)  
**Subject:** Public Comment - Registered Sanitarian  
**Date:** Thursday, May 21, 2020 12:45:19 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[MALEHA Sanitarian Registration Support - 052120.pdf](#)

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Hi Wes,

I am the current president of MALEHA and have attached our comments regarding the proposed revisions. We did also provide comments last summer and it appears those items have been addressed, thank you. We have one concern regarding "grandfathering" and that is detailed in the attached letter. Please feel free to contact me should you have any questions. It sounds like there will be some of our membership participating in the hearing tomorrow as well.

-Matt

**Matt Bolang, MSA, REHS**  
**Deputy Health Officer**  
**Director of Environmental Health**  
Livingston County Health Department  
2300 East Grand River  
Howell, MI 48843

517-552-6870 | [www.lchd.org](http://www.lchd.org)



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