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GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
LANSING

MARLON I. BROWN, DPA
DIRECTOR

October 16, 2024

Joint Committee on Administrative Rules
Boji Tower, Third Floor
124 W. Allegan St.
P.O. Box 30036
Lansing, MI 48909-7536

RE: Request to Waive Remaining Session days for LARA rule sets

Chair Wojno, Alternate Chair Haadsma, and Committee Members:

As the Director of the Office of Policy and Legislative Affairs (OPLA) for the Department of Licensing and Regulatory Affairs (LARA), I respectfully request that the Joint Committee on Administrative Rules (JCAR) waive the remaining session days, under the authority provided in the Administrative Procedures Act, MCL 24.245a(1), for the following LARA rule sets:

- Construction Code – Rehabilitation Code (2022-58 LR)
- Construction Code – Part 4 Building Codes (2022-57 LR)
- Audiology – General Rules (2023-037 LR)
- Construction Code – Part 10a Energy Code (2021-49 LR)
- Securities (2023-40 LR)
- Professional Surveyors – General Rules (2023-49 LR)
- Architects – General Rules (2023-47 LR)
- Real Estate Appraisers – General Rules (2023-32 LR)
- Nursing Home Administrators – General Rules (2022-67 LR)
- Professional Engineers – General Rules (2023-48 LR)
- Optometry – General Rules (2023-73 LR)
- Chiropractic – General Rules (2023-35 LR)
- Pharmacy – Program for Utilization of Unused Prescription Drugs (2022-62 LR)
- Mortuary Science (2023-17 LR)
- Uniform System of Accounts for Major and Nonmajor Electric Utilities (2024-7 LR)
- Osteopathic Medicine and Surgery – General Rules (2023-36 LR)
- Psychology – General Rules (2023-52 LR)

These rules address outdated standards in construction codes, professional licensing requirements, and educational requirements, while also streamlining the administration of regulations for the professional licenses that LARA oversees to better serve Michigan's citizens. Many of these rules were developed over years of work with stakeholders and represent a collaborative partnership to better promote efficient administration and the health and safety of Michiganders. Additionally, some of these rules align with federal and regional standards, with implementation deadlines starting in January 2025.

Given the approaching new session, the delay in resubmitting these rules when a new Joint Committee on Administrative Rules is formed, the pressing deadlines, and the impact these new requirements will have on licenses and the public, LARA respectfully asks that the committee waive the remaining balance of sessions days that the committee has for reviewing the rules.

Thank you for considering this request. Please contact me at (517) 241-4580 with any questions or concerns.

Sincerely,



Paige Fults
Director of Policy and Legislative Affairs
Michigan Department of Licensing and Regulatory Affairs

cc/att: Rachel Hugart, Counsel, JCAR
Tim Reeves, Counsel, JCAR
Desmond Miller, Michigan Senate Democratic Policy Office
Coffiann Hawthorne, Michigan House Democratic Policy Office
Marlon I. Brown, Director, LARA
Courtney Pendleton, Chief Operating Officer, LARA
Adam Sandoval, Chief Legal Officer and Deputy Director, LARA
Andrew Brisbo, Director, Bureau of Construction Codes, LARA
Linda Clegg, Director, Corporation, Securities and Commercial Licensing Bureau, LARA
Amy Gumbrecht, Director, Bureau of Professional Licensing, LARA
Dan Scripps, Chair, Michigan Public Service Commission
Katie Wienczewski, Director, Administrative Rules Division, MOAHR