

From: [Linsey Goodwin](#) on behalf of [Linsey Goodwin <LGoodwin@azleg.gov>](#)
To: [Emily Rajakovich](#)
Subject: RE: re: HB2569 questions
Date: Tuesday, April 16, 2019 4:54:31 PM
Attachments: [2569 Constituent Information.docx](#)
[image001.png](#)

What we discussed on the phone.

Have a good night!

Linsey Goodwin
2019-04-16 16:54

From: Linsey Goodwin
Sent: Tuesday, April 16, 2019 3:55 PM
To: Emily Rajakovich <erajakovich@az.gov>
Subject: re: HB2569 questions

Emily,

I recall you and I discussing the phrase “jurisdiction” at some point to accompany the word “state” in HB2569. Individuals have reached out to me to see if a license in Puerto Rico would be applicable to this bill and after some digging I think it is, should the regulating entity determine “same practice level.”

To clarify, I spoke with our attorneys at legislative council who told me that the word “State,” as defined by A.R.S. § [1-215](#), “includes the District of Columbia, this state and the territories” (Paragraph 37). So it is my understanding that licenses from American Samoa, Guam, Northern Mariana Islands, Puerto Rico, or the U.S. Virgin Islands qualify for occupational licensing recognition/reciprocity.

I just wanted to chat with you and see how your boards are currently handling reciprocity for individuals licensed in U.S. Territories. I definitely don’t want to hand out incorrect information!

All the best,

Linsey Goodwin
Assistant Policy Advisor
Arizona House of Representatives
1700 West Washington
Phoenix, AZ 85007
2019-04-16 16:54



From: [Emily Rajakovich](#) on behalf of [Emily Rajakovich <erajakovich@az.gov>](#)
To: [Ryan Edmonson](#); [Kristina Gomez](#)
Subject: Fwd: Licensure by Credentials in AZ
Date: Wednesday, May 29, 2019 10:23:41 AM

Hi Ryan and Kristina

I will be working with boards to implement 2569--the universal recognition bill. I just wanted to share the information below that may be a bit of misinformation from board staff. There isn't a school requirement in 2569. A professional with a license in good standing may be qualified so long as they meet all other requirements in the bill, including establishing residency. Would you be able to assist here? We will be doing much more implementation work over the next 90 days, too.

Emily

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From: >
Date: Tue, May 28, 2019 at 2:46 PM
Subject: Re: Licensure by Credentials in AZ
To: Sherrie Biggs <sherrie.biggs@dentalboard.az.gov>, <erajakovich@az.gov>

Good afternoon, thank you for your response to my question about the application for licensing after passing of H.B. 2569. I will CC Ms. Emily Rajakovich at the governors office on this email thread to see if she perhaps have an update for both of us. I am in the process of negotiations with offices in AZ and would need to obtain the license fairly soon in order to sign a contract.

Thank you again,
Nima D. Sarmast, DDS

On May 28, 2019, at 15:15, Sherrie Biggs <sherrie.biggs@dentalboard.az.gov> wrote:

We do not have any specific information for graduates of a non accredited dental school graduate at this time.

Sherrie

Sherrie Biggs
Licensing Manager
Arizona State Board of Dental Examiners
1740 W. Adams Ste: 2470
Phoenix, AZ 85007
[dentalboard.az.gov](http://www.dentalboard.az.gov)

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On Mon, May 27, 2019 at 4:43 PM Nima

> wrote:

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On Feb 20, 2018, at 13:38, Sherrie Biggs <sherrie.biggs@dentalboard.az.gov> wrote:

Frequently Asked Questions | Arizona State Board of Dental Examiners

Dr. Sarmast:

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Sherrie

Sherrie Biggs
Licensure Manager
Arizona State Board of Dental Examiners
1740 W. Adams Ste: 2470
Phoenix, AZ 85007
Phone: 602.542.4453

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Emily Rajakovich | **Office of Arizona Governor Doug Ducey**
Director, Boards and Commissions

www.azgovernor.gov

From: [Emily Rajakovich](#) on behalf of [Emily Rajakovich <erajakovich@az.gov>](#)
To: [Ryan Edmonson](#); [Kristina Gomez](#)
Subject: Fwd: Licensure by Credentials in AZ
Date: Wednesday, May 29, 2019 10:25:01 AM

Kristina--sent it to your old email address by mistake. Please see the below email.

E

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From: [Kristina Gomez](#) on behalf of [Kristina Gomez <kristina.gomez@dentalboard.az.gov>](#)
To: [Emily Rajakovich](#)
Subject: Re: Licensure by Credentials in AZ
Date: Wednesday, May 29, 2019 10:37:36 AM

Hi Emily,

No problem! Thank you for sharing with me.

I hope you are having a good day!

Sincerely,
Kristina

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From: [Ryan Edmonson](#) on behalf of [Ryan Edmonson <ryan.edmonson@dentalboard.az.gov>](mailto:ryan.edmonson@dentalboard.az.gov)
To: [Emily Rajakovich](#)
Cc: [Kristina Gomez](#); [Sherrie Biggs](#)
Subject: Re: Licensure by Credentials in AZ
Date: Friday, May 31, 2019 8:21:51 AM

Thank you Emily for your email and for the opportunity to provide a response.

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Respectfully,

Ryan Edmonson

Executive Director



Arizona State Board of Dental Examiners
1740 West Adams Street, Suite 2470, Phoenix, AZ
85007
E: ryan.edmonson@dentalboard.az.gov
W: <https://dentalboard.az.gov/>

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From: [Ryan Edmonson](#) on behalf of [Ryan Edmonson <ryan.edmonson@dentalboard.az.gov>](#)
To: [Kristina Gomez](#)
Cc: [Emily Rajakovich](#); [Sherrie Biggs](#)
Subject: Fwd: Licensure by Credentials in AZ
Date: Friday, May 31, 2019 8:23:11 AM

Crazy, I did a reply all even after I knew that podiatry was not the correct address. Sorry.

Ryan Edmonson

Executive Director



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Nima Sarmast, DDS

On Feb 20, 2018, at 13:38, Sherrie Biggs
<sherrie.biggs@dentalboard.az.gov> wrote:

Frequently Asked Questions | Arizona State Board of Dental
Examiners

Dr. Sarmast:

In order to obtain licensure in Arizona, a dentist must graduate from an ADA accredited program and receive a diploma conferring a degree of DDS or DMD.

Sherrie

Sherrie Biggs
Licensure Manager
Arizona State Board of Dental Examiners
1740 W. Adams Ste: 2470
Phoenix, AZ 85007
Phone: 602.542.4453

On Sun, Feb 18, 2018 at 8:46 PM, Nima Sarmast

< > wrote:

Dear Ms. Biggs and the Dental Board of Arizona,
I have a question about becoming licensed as a dentist in the
state of Arizona by Credentials. I have read the laws of the
State and wanted to ask the following for clarification
purposes:

I am a US citizen and I hold current unrestricted/good standing
dental licenses in the states of Texas (2014-), Washington
(2015-) and California (2017-). I have successfully passed the
CDCA (NERB) endorsed by the state of TX in 2014 as well as
the National Boards I and II. I'm a periodontist and I earned
my advanced education certificate in Periodontics from the
State University of New York (SUNY, Stony Brook, NY) and
my dental degree (DDS) is originally from Sweden.

Based on the above, would I be eligible to apply for dental
license by credentials in Arizona?

I appreciate your response,
thank you,

Sincerely,
Nima D. Sarmast, DDS, MS, MPH

Emily Rajakovich | **Office of Arizona Governor Doug Ducey**
Director, Boards and Commissions

www.azgovernor.gov

From: [Emily Rajakovich](#) on behalf of [Emily Rajakovich <erajakovich@az.gov>](#)
To: [Jennifer Thomsen](#)
Subject: Re: Occupational Recognition
Date: Monday, June 10, 2019 9:55:27 AM

Hi Jenny-

Yes--there are a couple fact sheets. See below. Let me know if the links don't work.

As far as fees go: Yes, applicants using the universal recognition policy must pay licensing fees to the appropriate state board for their AZ license. For testing: out-of-state applicants ONLY need to take an exam in AZ if there is an Arizona state specific exam already required. If there is an Arizona state jurisprudence exam in statute or rule, applicants must take and pass that in AZ. Real estate agents, for example, have a state-specific exam in AZ so out-of-state applicants must still take and pass that exam. Out of state real estate agents do not have to sit for the required Arizona education courses/credits, however. The law also says that if an applicant's original state required an exam, the person must have taken and passed that exam.

A couple fact sheets:

<https://azgovernor.gov/sites/default/files/universallicensingrecognition.pdf>
https://azgovernor.gov/sites/default/files/universal_licensing_recognition.pdf

And the press release from when the bill was introduced: <https://azgovernor.gov/governor/news/2019/02/let-them-work-bill-introduced-reduce-barriers-employment>

Let me know what else you need! Good luck!
Emily

On Mon, Jun 10, 2019 at 7:40 AM Jennifer Thomsen <jthomsen@az.gov> wrote:

Hi Emily!

I'm at the American Defense Communities Summit in DC, and there's already been some discussion on AZ's new recognition bill. Do you have an FAQ or talking points I can use to hype up the policy? Especially in regards to how it works (do they take a test, pay a fee, etc?) I am attending a session tomorrow morning with other states to talk about licensing and I want to be prepared.

Thanks!

Jenny

--

Jennifer Thomsen

Policy Advisor, Public Safety and Military Affairs

Office of Arizona Governor Doug Ducey

1700 W Washington St

Phoenix AZ 85007

--

Emily Rajakovich | **Office of Arizona Governor Doug Ducey**
Director, Boards and Commissions

www.azgovernor.gov

From: [Jennifer Thomsen](#) on behalf of [Jennifer Thomsen <jthomsen@az.gov>](#)
To: [Emily Rajakovich](#)
Subject: Re: Occupational Recognition
Date: Tuesday, June 11, 2019 5:52:34 AM

Thank you so much, Emily!! This is really helpful!

On Mon, Jun 10, 2019 at 9:55 AM Emily Rajakovich <erajakovich@az.gov> wrote:

Hi Jenny-

Yes--there are a couple fact sheets. See below. Let me know if the links don't work.

As far as fees go: Yes, applicants using the universal recognition policy must pay licensing fees to the appropriate state board for their AZ license. For testing: out-of-state applicants ONLY need to take an exam in AZ if there is an Arizona state specific exam already required. If there is an Arizona state jurisprudence exam in statute or rule, applicants must take and pass that in AZ. Real estate agents, for example, have a state-specific exam in AZ so out-of-state applicants must still take and pass that exam. Out of state real estate agents do not have to sit for the required Arizona education courses/credits, however. The law also says that if an applicant's original state required an exam, the person must have taken and passed that exam.

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Let me know what else you need! Good luck!

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Thanks!

Jenny

--

Jennifer Thomsen

Policy Advisor, Public Safety and Military Affairs

Office of Arizona Governor Doug Ducey

[1700 W Washington St](#)

Phoenix AZ 85007

--

Emily Rajakovich | **Office of Arizona Governor Doug Ducey**
Director, Boards and Commissions

www.azgovernor.gov

--

Jennifer Thomsen

Policy Advisor, Public Safety and Military Affairs
Office of Arizona Governor Doug Ducey
1700 W Washington St
Phoenix AZ 85007

From: [Emily Rajakovich](#) on behalf of [Emily Rajakovich <erajakovich@az.gov>](#)
To: [Karen Donahue](#); [Karen Whiteford](#); [Margaret Whelan](#); [Megan Darian](#); [Judith Stapley](#); [David Geriminsky](#); [Sam J. Barcelona](#); [Jenna Jones](#); [John Confer](#); [Heather Broaddus](#)
Cc: [Martha Rudnick](#); [Brandon Kent](#); [Lauren Bouton](#)
Bcc: [Ben Blink](#); [Gretchen Conger](#)
Subject: E-licensing/HB2569 Universal Recognition Action Items
Date: Friday, July 12, 2019 10:34:29 AM
Attachments: [Business Requirements - Aggregate Template \(1\).xlsx](#)
[2569 Implementation Checklist.pdf](#)

Dear Executive Directors-

Thank you all for taking the time to meet with me on the implementation of HB2569-- universal recognition of occupational/professional licenses. This is an exciting new policy change and we want professionals to be able to take advantage of this new pathway to licensure starting on the effective date of August 27. I understand at least one board currently has pending applications that likely qualify for universal recognition and stands ready to grant those licenses on day 1. This is fantastic!! I hope to highlight many other successes from your boards. As I shared in our meetings, the Governor's management system is data driven and it will be important for regulatory boards to collect data on applications received and licenses granted under universal recognition.

I also understand from our recent meetings that making changes to your applications via the e-licensing system is a concern for implementation. **You are included on this email as an executive director of a board using the shared e-licensing system.**

As a follow-up, I met with Martha Rudnick and Branden Kent at ASET and asked what could be done to facilitate changes to the e-licensing applications to ensure applications are ready to capture information required to grant licenses under universal recognition before August 27.

Martha and Brandon stand ready to help boards accomplish changes or updates to the e-licensing system, as appropriate. If it's not something that can be accomplished in-house, they will provide recommendations to you. If a change requires outside expertise or may be delayed for complexity, I expect you to provide a plan B solution to accept universal recognition applications by August 27. Martha and Brandon will rely on each of you to help translate policy/legislation into e-licensing requirements.

Action Items

To help organize your needs, Brandon created the attached spreadsheet for you as executive directors to list out exactly what changes are needed to your e-licensing application process(es) to comply with HB2569. **There is an "Instruction" tab within the document.**

Please complete the spreadsheet and then send it directly to Martha Rudnick (on this email) and copy me (erajakovich@az.gov); Brandon Kent (on this email) and include the general engagement manger email (Engagement_Managers@azdoa.gov) to ensure ALL engagement mangers see your replies ASAP.

Please complete the spreadsheet and send it in ASAP or by next Wednesday, July 17 at the latest. Martha and Brandon will review submitted information quickly and help us all develop a plan. Your detailed input is critical.

I also attached an updated version of the HB2569 implementation summary I provided at our meetings. I added some information as you each brought up great questions that I wanted to

clarify in this document.

Thank you so much for the work on this important policy! I appreciate all you are doing. Let me know if you have any questions or if there are more ways I can help.

Emily

--

Emily Rajakovich | **Office of Arizona Governor Doug Ducey**
Director Boards and Commissions

www.azgovernor.gov

From: [Ryan Edmonson](#) on behalf of [Ryan Edmonson <ryan.edmonson@dentalboard.az.gov>](mailto:ryan.edmonson@dentalboard.az.gov)
To: [Emily Rajakovich](#)
Subject: Residency
Date: Friday, July 12, 2019 3:16:13 PM

Good Afternoon Emily,

In anticipation of the universal recognition implementation, I went to a local Arizona MVD office to see what they require for the new licenses to establish residency. Here is how their form reads: "Documents or mail issued from a business, organization or government agency that contain: applicant name and physical residential address."

Maybe this will help, in some way, the establishment of residency in Arizona?

Ryan Edmonson

Executive Director



Arizona State Board of Dental Examiners
1740 West Adams Street, Suite 2470, Phoenix, AZ
85007

E: ryan.edmonson@dentalboard.az.gov
W: <https://dentalboard.az.gov/>

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From: [Emily Rajakovich](#) on behalf of [Emily Rajakovich <erajakovich@az.gov>](#)
To: [Ryan Edmonson](#)
Subject: Re: Residency
Date: Friday, July 12, 2019 3:58:20 PM

Ryan

Good thought. Yes, I think this is very instructive toward residency requirement. Does that match any other references you have to residency in your statutes or rule?

Emily

On Fri, Jul 12, 2019 at 3:16 PM Ryan Edmonson <ryan.edmonson@dentalboard.az.gov> wrote:

Good Afternoon Emily,

In anticipation of the universal recognition implementation, I went to a local Arizona MVD office to see what they require for the new licenses to establish residency. Here is how their form reads: "Documents or mail issued from a business, organization or government agency that contain: applicant name and physical residential address."

Maybe this will help, in some way, the establishment of residency in Arizona?

Ryan Edmonson

Executive Director



Arizona State Board of Dental Examiners
1740 West Adams Street, Suite 2470, Phoenix, AZ
85007

E: ryan.edmonson@dentalboard.az.gov

W: <https://dentalboard.az.gov/>

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--

Emily Rajakovich | Office of Arizona Governor Doug Ducey

Director, Boards and Commissions

Office of the Governor

www.azgovernor.gov

From: [Ryan Edmonson](#) on behalf of [Ryan Edmonson <ryan.edmonson@dentalboard.az.gov>](#)
To: [Emily Rajakovich](#)
Subject: Re: Residency
Date: Friday, July 12, 2019 4:29:47 PM

The Board does not have any references to residency in their statutes or rules..., other than completion of a residency program .

Ryan Edmonson

Executive Director



Arizona State Board of Dental Examiners
1740 West Adams Street, Suite 2470, Phoenix, AZ
85007

E: ryan.edmonson@dentalboard.az.gov
W: <https://dentalboard.az.gov/>

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On Fri, Jul 12, 2019 at 3:58 PM Emily Rajakovich <erajakovich@az.gov> wrote:

Ryan

Good thought. Yes, I think this is very instructive toward residency requirement. Does that match any other references you have to residency in your statutes or rule?

Emily

On Fri, Jul 12, 2019 at 3:16 PM Ryan Edmonson <ryan.edmonson@dentalboard.az.gov> wrote:

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Ryan Edmonson

Executive Director

Arizona State Board of Dental Examiners



1740 West Adams Street, Suite 2470, Phoenix, AZ
85007

E: ryan.edmonson@dentalboard.az.gov

W: <https://dentalboard.az.gov/>

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--

Emily Rajakovich | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions

www.azgovernor.gov

From: [Emily Rajakovich](#) on behalf of [Emily Rajakovich <erajakovich@az.gov>](#)
To: [Ryan Edmonson](#)
Subject: Re: Residency
Date: Friday, July 12, 2019 4:38:03 PM

Got it. Then yes, I think looking at how other state agencies qualify and define residency is very instructive.

On Fri, Jul 12, 2019 at 4:29 PM Ryan Edmonson <ryan.edmonson@dentalboard.az.gov> wrote:

The Board does not have any references to residency in their statutes or rules..., other than completion of a residency program .

Ryan Edmonson

Executive Director



Arizona State Board of Dental Examiners
1740 West Adams Street, Suite 2470, Phoenix, AZ
85007

E: ryan.edmonson@dentalboard.az.gov
W: <https://dentalboard.az.gov/>

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Executive Director



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Emily Rajakovich | **Office of Arizona Governor Doug Ducey**
Director, Boards and Commissions

www.azgovernor.gov

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Emily Rajakovich | **Office of Arizona Governor Doug Ducey**
Director, Boards and Commissions

www.azgovernor.gov

From: [Judith Stapley](mailto:judith.stapley@funeralboard.az.gov) on behalf of [Judith Stapley <judith.stapley@funeralboard.az.gov>](mailto:judith.stapley@funeralboard.az.gov)
To: [Martha Rudnick](mailto:Martha.Rudnick)
Cc: [Brandon Kent](mailto:Brandon.Kent); [Emily Rajakovich](mailto:Emily.Rajakovich); ADOA - Engagement Managers; haley.greenberg@azdoa.gov
Subject: Re: E-licensing/HB2569 Universal Recognition Action Items
Date: Tuesday, July 16, 2019 8:20:41 AM
Attachments: [Business Requirements - HB2569.xlsx](#)

Hello Colleagues,

I have discussed the implications of Universal Recognition with the Funeral Board staff. We believe the online process could be approached with two possibilities.

1. An immediate "quick fix" would be to add the option to apply via "Universal Recognition" on the drop-down menu. Right now, we currently have "general" as the only option when an applicant must click "application by" and "application type". With this "quick fix," we would be able to identify who is applying through Universal Recognition and then go through the backside and uncheck all required documents and submissions that will now, not be required.
2. A long term fix would require the online process to recognize when an individual is asking to be licensed via Universal Recognition and then send them to a simplified application with the new requirements. We have included the required items for application via Universal Recognition, in the attached spreadsheet.

We would be happy to meet in person with our Engagement Manager to further clarify what would be different on the applications.

Judith Stapley
Executive Director
Arizona State Board of Funeral Directors and Embalmers

judith.stapley@funeralboard.az.gov

1740 W. Adams St., Suite 3006
Phoenix, Arizona 85007

On Fri, Jul 12, 2019 at 10:34 AM Emily Rajakovich <erajakovich@az.gov> wrote:

Dear Executive Directors-

Thank you all for taking the time to meet with me on the implementation of HB2569-- universal recognition of occupational/professional licenses. This is an exciting new policy change and we want professionals to be able to take advantage of this new pathway to licensure starting on the effective date of August 27. I understand at least one board currently has pending applications that likely qualify for universal recognition and stands ready to grant those licenses on day 1. This is fantastic!! I hope to highlight many other successes from your boards. As I shared in our meetings, the Governor's management system is data driven and it will be important for regulatory boards to collect data on applications received and licenses granted under universal recognition.

I also understand from our recent meetings that making changes to your applications via the e-licensing system is a concern for implementation. **You are included on this email as an executive director of a board using the shared e-licensing system.**

As a follow-up, I met with Martha Rudnick and Branden Kent at ASET and asked what could be done to facilitate changes to the e-licensing applications to ensure applications are ready to capture information required to grant licenses under universal recognition before August 27.

Martha and Brandon stand ready to help boards accomplish changes or updates to the e-licensing system, as appropriate. If it's not something that can be accomplished in-house, they will provide recommendations to you. If a change requires outside expertise or may be delayed for complexity, I expect you to provide a plan B solution to accept universal recognition applications by August 27. Martha and Brandon will rely on each of you to help translate policy/legislation into e-licensing requirements.

Action Items

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I also attached an updated version of the HB2569 implementation summary I provided at our meetings. I added some information as you each brought up great questions that I wanted to clarify in this document.

Thank you so much for the work on this important policy! I appreciate all you are doing. Let me know if you have any questions or if there are more ways I can help.

Emily

--

Emily Rajakovich | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions

www.azgovernor.gov

From: [John Confer](#) on behalf of [John Confer <john@rb.az.gov>](#)
To: [Emily Rajakovich](#)
Subject: Re: E-licensing/HB2569 Universal Recognition Action Items
Date: Wednesday, July 17, 2019 1:14:01 PM

Emily,

Can you provide some clarification if possible, it would aid in completion of the spreadsheet that you requested. Do you have the data set identified here? "As I shared in our meetings, the Governor's management system is data driven and it will be important for regulatory boards to collect data on applications received and licenses granted under universal recognition."

I need the specifications to compare to our current system to ensure that we are collecting the data required.

Also, if the out of state applicant does not establish residency or is not a resident of Arizona, they are not eligible to be licensed under this new, Universal Licensing Pathway, correct?

Thank you and Respectfully

On Fri, Jul 12, 2019 at 10:34 AM Emily Rajakovich <erajakovich@az.gov> wrote:

Dear Executive Directors-

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Thank you so much for the work on this important policy! I appreciate all you are doing. Let me know if you have any questions or if there are more ways I can help.

Emily

--

Emily Rajakovich | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions

www.azgovernor.gov

--

Jack Confer

Executive Director

Arizona Board of Respiratory Care Examiners

1740 West Adams Street, Suite 3406

Phoenix, AZ 85007

Suggestions? Comments? Survey here: <https://respiratoryboard.az.gov/survey>

From: [John Confer](#) on behalf of [John Confer <john@rb.az.gov>](mailto:john@rb.az.gov)
To: [Martha Rudnick](#); [Brandon Kent](#); Engagement_Managers@azdoa.gov
Cc: [Emily Rajakovich](#)
Subject: Business Requirements: E-licensing/HB2569 Universal Recognition Action
Date: Thursday, July 18, 2019 8:04:01 AM
Attachments: [Business Requirements - Aggregate Template.xlsx](#)

Team,

Please find the attached.

Respectfully,

--

Jack Confer

Executive Director

Arizona Board of Respiratory Care Examiners

1740 West Adams Street, Suite 3406

Phoenix, AZ 85007

Suggestions? Comments? Survey here: <https://respiratoryboard.az.gov/survey>

From: [David Geriminsky](#) on behalf of [David Geriminsky <david.geriminsky@acupuncture.az.gov>](#)
To: [Martha Rudnick](#)
Cc: [Brandon Kent](#); [Emily Rajakovich](#); [ADOA - Engagement Managers](#)
Subject: Acupuncture Universal Recognition Spreadsheet
Date: Thursday, July 18, 2019 10:42:19 AM
Attachments: [Business Requirements - Acupuncture Board \(1\).xlsx](#)

Please find the attached

Yours in Service,

David Geriminsky
Executive Director
Arizona Acupuncture Board of Examiners

www.acupunctureboard.az.gov

We have a NEW licensing database that will allow you to file your renewal application and pay for it online. Please utilize this system going forward. [E-Licensing System](#)

[Please take our Satisfaction Survey](#)

From: [Karen Donahue](#) on behalf of [Karen Donahue <karen.donahue@ptboard.az.gov>](#)
To: [Emily Rajakovich](#); [Martha Rudnick](#); [Engagement_Managers@azdoa.gov](#)
Subject: Re: E-licensing/HB2569 Universal Recognition Action Items
Date: Friday, July 19, 2019 10:45:28 AM
Attachments: [Business Requirements - Universal Licensure- Certification Request changes to eLicensure.xlsx](#)

Sorry for the delay due to being out of the office for the past 2 weeks. Attached is the spreadsheet with requested modifications to the eLicensing system. Please contact my office if you have any questions.

Karen

Karen Donahue PT, DPT

Executive Director

Arizona State Board of Physical Therapy

1740 West Adams Street, STE 2450

Phoenix, AZ 85013

www.ptboard.az.gov

On Fri, Jul 12, 2019 at 10:34 AM Emily Rajakovich <erajakovich@az.gov> wrote:

Dear Executive Directors-

Thank you all for taking the time to meet with me on the implementation of HB2569-- universal recognition of occupational/professional licenses. This is an exciting new policy change and we want professionals to be able to take advantage of this new pathway to licensure starting on the effective date of August 27. I understand at least one board currently has pending applications that likely qualify for universal recognition and stands ready to grant those licenses on day 1. This is fantastic!! I hope to highlight many other successes from your boards. As I shared in our meetings, the Governor's management system is data driven and it will be important for regulatory boards to collect data on applications received and licenses granted under universal recognition.

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I also attached an updated version of the HB2569 implementation summary I provided at our meetings. I added some information as you each brought up great questions that I wanted to clarify in this document.

Thank you so much for the work on this important policy! I appreciate all you are doing. Let me know if you have any questions or if there are more ways I can help.

Emily

--

Emily Rajakovich | Office of Arizona Governor Doug Ducey

Director, Boards and Commissions

700 North Central Avenue, Suite 1000

www.azgovernor.gov

From: [Emily Rajakovich](#) on behalf of [Emily Rajakovich <erajakovich@az.gov>](#)
To: [John Confer](#)
Subject: Re: E-licensing/HB2569 Universal Recognition Action Items
Date: Monday, July 22, 2019 2:56:24 PM

Jack

Sorry for my delay--I have been traveling for work and catching up. Thanks for proactively submitting the spreadsheet to ASET. I am sure it's great information. When I referenced the Governor's management system (aka management style) being data driven, I meant that it will be important for Boards to capture the number of applicants received and the number of licenses provided under "universal recognition" so we can report success stories from this new policy. We will want to collect the exact number of applications received and licenses granted. I will be checking in with boards periodically after implementation to gather these numbers.

You are correct about the residency requirement--an applicant must establish residency to qualify.

Let me know what else I can do.
Emily

On Wed, Jul 17, 2019 at 1:14 PM John Confer <john@rb.az.gov> wrote:

Emily,

Can you provide some clarification if possible, it would aid in completion of the spreadsheet that you requested. Do you have the data set identified here? "As I shared in our meetings, the Governor's management system is data driven and it will be important for regulatory boards to collect data on applications received and licenses granted under universal recognition."

I need the specifications to compare to our current system to ensure that we are collecting the data required.

Also, if the out of state applicant does not establish residency or is not a resident of Arizona, they are not eligible to be licensed under this new, Universal Licensing Pathway, correct?

Thank you and Respectfully

On Fri, Jul 12, 2019 at 10:34 AM Emily Rajakovich <erajakovich@az.gov> wrote:

Dear Executive Directors-

Thank you all for taking the time to meet with me on the implementation of HB2569--universal recognition of occupational/professional licenses. This is an exciting new policy change and we want professionals to be able to take advantage of this new pathway to licensure starting on the effective date of August 27. I understand at least one board currently has pending applications that likely qualify for universal recognition and stands ready to grant those licenses on day 1. This is fantastic!! I hope to highlight many other successes from your boards. As I shared in our meetings, the Governor's management system is data driven and it will be important for regulatory boards to collect data on applications received and licenses granted under universal recognition.

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Martha and Brandon stand ready to help boards accomplish changes or updates to the e-licensing system, as appropriate. If it's not something that can be accomplished in-house, they will provide recommendations to you. If a change requires outside expertise or may be delayed for complexity, I expect you to provide a plan B solution to accept universal recognition applications by August 27. Martha and Brandon will rely on each of you to help translate policy/legislation into e-licensing requirements.

Action Items

To help organize your needs, Brandon created the attached spreadsheet for you as executive directors to list out exactly what changes are needed to your e-licensing application process(es) to comply with HB2569. **There is an "Instruction" tab within the document.**

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Emily Rajakovich | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions

www.azgovernor.gov

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Jack Confer

Executive Director

Arizona Board of Respiratory Care Examiners

1740 West Adams Street, Suite 3406

Phoenix, AZ 85007

Suggestions? Comments? Survey here: <https://respiratoryboard.az.gov/survey>

--

Emily Rajakovich | **Office of Arizona Governor Doug Ducey**
Director, Boards and Commissions

www.azgovernor.gov

From: [John Confer](#) on behalf of [John Confer <john@rb.az.gov>](#)
To: [Emily Rajakovich](#)
Subject: Re: E-licensing/HB2569 Universal Recognition Action Items
Date: Monday, July 22, 2019 3:04:07 PM

Thanks! Safe travels!

On Mon, Jul 22, 2019 at 2:56 PM Emily Rajakovich <erajakovich@az.gov> wrote:

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Emily

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Emily Rajakovich | Office of Arizona Governor Doug Ducey

Director, Boards and Commissions

www.azgovernor.gov

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Jack Confer

Executive Director

Arizona Board of Respiratory Care Examiners

1740 West Adams Street, Suite 3406

Phoenix, AZ 85007

Suggestions? Comments? Survey here: <https://respiratoryboard.az.gov/survey>

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From: [Emily Rajakovich](#) on behalf of [Emily Rajakovich <erajakovich@az.gov>](#)
To: [Martha Rudnick](#)
Cc: [Brandon Kent](#)
Subject: Re: E-licensing/HB2569 Universal Recognition Action Items
Date: Monday, July 22, 2019 8:35:04 PM

Thanks, Martha! The Nursing Care Institution Administrators and Assisted Living Managers is not impacted by this new law since it only applies to Title 32 boards and NCIA falls under Title 36. Sorry—I should have mentioned that.

I have to admit I'm a little confused on any mismatch between what the boards provided—particularly the “business process change” vs “system change requirements.” My understanding was that I asked the boards just to tell us exactly what was needed for compliance with 2569 as it relates to accepting and processing application via their e-licensing portal. Brandon's original email to me also says the spreadsheet is for “business requirements.” I'm sorry to have missed the distinction.

For this meeting on Wednesday, I think we need to meet the boards where they are whether they are requesting a business or systems change and help them get from A to B with that. The definitions could potentially cause more confusion and push us backward—although a quick refresher at the beginning of the meeting is probably very helpful to level-set.

If the majority of the boards requested business process changes, we can all work together to figure out how/if that translates to system changes.

I do think it's great to use the meeting to more perfectly understand what the boards need. I plan to attend to listen and know we should be able to make progress quickly after this meeting. I appreciate the work it will take from ASET to estimate the scope of work after the meeting.

Thank you again for making this a priority!

With gratitude,
Emily

On Mon, Jul 22, 2019 at 2:49 PM Martha Rudnick <martha.rudnick@azdoa.gov> wrote:

Hello Emily!

Just keeping you updated on the progress of this activity.

We received responses from the following Boards:

- Physical Therapy
- Acupuncture
- Occupational Therapy
- Athletic Training
- Respiratory Care Examiners
- Podiatry
- Optometry
- Funeral Directors and Embalmers
- Psychologist Examiners

We did not receive responses from Dispensing Opticians, Board of Barbers or Nursing Care Institution Administrators and Assisted Living Managers.

We have reviewed the submissions and the information that was received was basically business process changes as opposed to system change requirements. As such we are scheduling a meeting with the Boards to explain and educate them with examples of system requirements. The meeting is tentatively scheduled for Wednesday at 10:00 AM and you are to be included should you wish to attend.

Once we have the meeting and get requirements from the Boards we will be better positioned to provide an estimate of the scope of the work involved as we discussed on the 10th.

If you have any questions, please do not hesitate to contact me.

Thank you!
Martha

Martha J. Rudnick
Manager, Service Management Office
ADOA-Arizona Strategic Enterprise Technology (ASET) Office | State of Arizona
100 N. 15th Avenue, Suite 400, Phoenix, AZ 85007
Phone: (602) 974-2000 | Martha.Rudnick@azdoa.gov
<http://aset.azdoa.gov>

How am I doing? Please take a moment to answer a few questions. <https://goo.gl/forms/gPW4VKZd56tma40c2>

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From: [Karen Donahue](#) on behalf of [Karen Donahue <karen.donahue@ptboard.az.gov>](mailto:karen.donahue@ptboard.az.gov)
To: [Damon Wellman](#); [Haley Greenberg](#); [Veronica Cardoza](#); [Monica Crowley](#); [Emily Rajakovich](#); [Charles Brown](#)
Subject: Modifications requested for Addition of Universal License/ Certification Application
Date: Monday, July 29, 2019 11:22:59 AM
Attachments: [Modifications for eLicensure for Universal Recognition license-certification.doc](#)

Please review attachment. Thanks!

Karen

Karen Donahue PT, DPT

Executive Director

Arizona State Board of Physical Therapy

1740 West Adams Street, STE 2450

Phoenix, AZ 85013

www.ptboard.az.gov



ARIZONA STATE BOARD OF PHYSICAL THERAPY

1740 W. ADAMS, SUITE 2450 PHOENIX, ARIZONA 85007
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Douglas A. Ducey
Governor

MARK CORNWALL, PT, PhD
President

NUSHKA REMEC, PT, MS, PCS
Vice President

KAREN BUSTILLO, PT
Secretary

PEGGY HUNTER, PTA, CLT
Professional Member

JOSHUA GREER
Public Member

KELLY KING PT, DPT
Professional Member

MICHAEL S. CLINTON, CPA
Public Member

KAREN DONAHUE PT, DPT
Executive Director

July 29, 2019

CC: damon.wellman@azdoa.gov
Haley.greenberg@azdoa.gov
erajakovich@az.gov

RE: Requested Modifications to eLicensing to Accommodate Universal Recognition Licenses and Certifications.

Below are the modifications required to accommodate the Universal Recognition Licenses and Certifications. The Board of Physical Therapy believes that these modifications can be made to the already existing endorsement application.

License selection

Select the board for which you are seeking a license. Next, select the license type and application type. Then select an account for business licenses applications or continue with the next steps.

Board*
--None--

License Type*
--None--

Application By*
--None--

Application by: **(ADD)** Universal Recognition

Eligibility

By answering the following questions, eligibility for the license application will be determined. Confirmation will be noted if eligibility is met. Provide the information necessary for the license application. Once finished, click which type of Save option desired.

The State's enterprise-Licensing system provides licensing services to individuals and businesses that are required to obtain and maintain a professional or occupational license to work in the State of Arizona. You are requesting to apply for a physical therapist license which will require you to be licensed in another jurisdiction outside the United States. (If you are currently licensed in another jurisdiction, you must use this application.)

Remove and replace with below modifications

1. Be of good moral character.
2. Complete the application process.
3. Be a graduate of a professional physical therapy education program that is accredited by a national accreditation agency approved by the board.
4. Have successfully passed the national examination approved by the board.
5. Have successfully passed a jurisprudence examination that tests the applicant's knowledge of board statutes and rules.
6. Obtain a valid fingerprint clearance card issued pursuant to section 41-1758.03.

If you currently do not hold a physical therapist/physical therapist assistant license/certificate in a jurisdiction other than Arizona, you should apply by examination.

Do you wish to proceed to the application?

Yes No

Modify the Eligibility as follows:

The State's enterprise-licensing system provides licensing services to individuals that are required to obtain and maintain a professional or occupational license to work in the state of Arizona. You are requesting to apply for a universal recognized license as a physical therapist (*or physical therapist assistant—both application types need this change*)

1. Be of good moral character.
2. Complete the application process.
3. Been licensed (*or certified*) in another state for at least one (1) year.
4. Be substantially equivalent to US degree requirements (If Foreign Educated).
5. Graduated from an approved CAPTE accredited school (If US Educated).
6. Provide proof of Arizona Residency.
7. Do not have a complaint, allegation or investigation pending before another regulating entity in another state or country that relates to unprofessional conduct.
8. Have successfully passed the jurisprudence examination approved by the board.
9. Obtain a valid fingerprint clearance card issued pursuant to section 41-1758.03.
10. Obtain verification of good standing in all previously and current licensed (*or certified*) jurisdictions.

If you do not meet the above criteria and hold a current physical therapist/physical therapist assistant license/certificate in another jurisdiction other than Arizona, you should apply by **endorsement**.

If you do not meet the above criteria and do not hold a physical therapist/physical therapist assistant license/certificate in a jurisdiction other than Arizona, you should apply by **examination**.

I do attest that I have been employed for one year or greater and wish to proceed to the application.

Yes No

Application Instructions

2. **Remove/ Add:** Proof of Arizona Residency (valid AZ drivers license; current AZ motor vehicle registration; Proof of filing AZ Income taxes; AZ voter registration card; Documentation of a mortgage for a primary AZ residence; Dated residential rental contract with proof of payment; Proof of major banking services in AZ or Proof of establishment of Arizona utilities.)

3. **Remove**

5. **Remove**

1. Complete all sections of the following application. Please note that all application fees are non-refundable by law.

2. Arizona Statement of Citizenship and Alien Status for State Public Benefits: Must be submitted along with proof of United States citizenship or Alien Status by every applicant for licensure. See form /instructions at <https://ptboard.az.gov>.

3. Request: Final official transcript (with date of graduation and degree earned) to be mailed directly to Arizona State Board of Physical Therapy (AZSBPT) by college or university. Please note that licensure will not be issued without the final transcript.

4. Request: Verification of licensure or certification from every state in which you hold or have ever held a license or certificate in physical therapy or in any medical related field regardless of whether current and including a statement of whether the applicant was ever denied a license by the agency and if so, an explanation.

5. Transfer your NPTE score at www.fsbpt.org. If you are unable to transfer online contact FSBPT* at 703-299-3100.

6. If a yes answer is given on "Good Moral Character Questions", Board staff cannot clear an applicant to test. The members of the Board must approve the request during a public session of the Arizona State Board of Physical Therapy which meets the fourth Tuesday of every month. All documentation relating to the Yes answer must be received before the Board may determine approval to test.

7. You must hold a valid Fingerprint Clearance Card. (A.R.S. §32-2022)
a. If you have a valid Arizona Fingerprint Clearance Card, submit a photocopy of the front and back. b. To obtain an Arizona Fingerprint Clearance Card, you may apply online at <http://fieldprintarizona.com> if you are in state. OR c. If you are out of state or do not have access to an internet connected device contact the Arizona Department of Public Safety (DPS) for a Fingerprint Clearance Card application packet. You may contact them by either calling 602.223.2279 or faxing your request to 602.223.2947. DPS office hours are Monday through Friday, 8:00 am to 5:00 pm.

~ All applicants are required to notify the Board immediately of any change of address, phone number, or name.

~ Title II of the Americans with Disabilities Act (ADA) prohibits the Arizona State Board of Physical Therapy from discriminating on the

Citizenship Status

1) Have you held a non-permanent status when you last submitted your statement of citizenship OR Have you had a change of status from either permanent to non-permanent status or from non-permanent to permanent status?

Remove/ add: Have you submitted proof of Arizona Residency?

Examination Details

1) Have you taken the examination?

Not Answered

Remove this section

2) Do you require ADA accommodations to take the examination?

Not Answered Yet

Good Moral Character

1) Have you been convicted of, pled guilty or no contest to, or entered into diversion in lieu of prosecution for any criminal offense in any jurisdiction of the United States or foreign country?

Not Answered Yet

2) Have you had an application for a professional or occupational license, certificate, or registration, other than a driver's license, denied, rejected, suspended, or revoked by any jurisdiction of the United States or foreign country?

Not Answered Yet

Attachments

If applicable, upload the Attachments for your license application by clicking the Choose Files button. It is necessary that the name of the file attachment is less than 80 characters in length for it to be received successfully. The character limit does include the file attachment extension, such as (.doc) and (.pdf).

Files must be less than 5MB in size. Accepted file types: .jpg, .jpeg, .png, .gif, .pdf, .doc, .docx, .ppt, .pptx, and .txt.

ACKNOWLEDGE BUTTON - For documentation that needs to be submitted directly to the Board or by hardcopy, please acknowledge by clicking the Acknowledge button.

If no attachment or attestation items appear, please click the Save and Continue button.

Final Official Transcript or Letter of Candidate for Graduation

REQUIRED

I acknowledge and understand that if I am accepted by the Board of Physical Therapy, I must have my Program Director send to the State of Arizona my official final transcripts. In addition, I must have my Program Director send to the State of Arizona my official final transcripts. In addition, I must have my Program Director send to the State of Arizona my official final transcripts. In addition, I must have my Program Director send to the State of Arizona my official final transcripts.

Remove

Fingerprint Clearance Card

REQUIRED

You must upload a front and back copy of your finger print clearance card issued by the department of public safety. To obtain an Arizona Fingerprint Clearance Card, you may apply online at <http://rfidprintarizona.com> if you are in state.

Arizona Statement of Citizenship and Alien Status for State Public Benefits

Remove/ add: Proof of Arizona Residency



[SUPPORT](#) [REGISTRATION GUIDE](#) [PRIVACY NOTICE](#) [WWW.AZ.GOV](#)

Arizona Statement of Citizenship and Alien Status for State Public Benefits

REQUIRED

You may download the form for State Public Benefits licensure. See form following the link below.

Remove: Add Proof of Arizona Residency. (valid AZ drivers license; current AZ motor vehicle registration; Proof of filing AZ Income taxes; AZ voter registration card; Documentation of a mortgage for a primary AZ residence; Dated residential rental contract with proof of payment; Proof of major banking services in AZ or Proof of establishment of Arizona utilities.)

Verification of Physical Therapist License

REQUIRED

You must upload a license verification for every jurisdiction in which you have had a license related to a health profession. If you do not upload the verification(s) you must have the verification(s) sent directly to the State of Arizona Board of Physical Therapy.

Proof of United States Citizenship or Alien Status

REQUIRED

You may download this required form for State Public Benefits: Must be completed by every applicant for licensure. See form following the link below.

Remove

board.az.gov. Arizona Statement of Citizenship or Alien Status United States citizenship or Alien Status by every applicant for licensure.

Photo

These are the modifications that the Board of Physical Therapy is requesting by August 27, 2019 in order for us to seamlessly and transparently receive and process applications under the Universal Recognition Law. If I can be of further assistance, please contact my office directly at 602-977-2020.

Thank you in advance for your assistance in modifying our eLicensing system to be able to accommodate this new application pathway.

Sincerely,

Karen

Karen Donahue PT, DPT
Executive Director
Arizona Board of Physical Therapy

From: [Tobi Zavala](#) on behalf of [Tobi Zavala <tobi.zavala@azbbhe.us>](#)
To: [Emily Rajakovich](#)
Subject: Universal Recognition
Date: Friday, August 2, 2019 7:47:53 AM

Good morning and happy Friday,

I am happy to report that we currently have 32 universal recognition applications. Twelve of them are deficient as they need proof of AZ residency but we have reached out to the applicant and hope to have them by August 27th.

Tobi Zavala, Executive Director



ARIZONA BOARD OF BEHAVIORAL HEALTH EXAMINERS
1740 W. Adams Street, Suite 3600, Phoenix, AZ 85007
Email: tobi.zavala@azbbhe.us
Board Website: www.azbbhe.us

THE BOARD IS GOING GREEN! Beginning October 1, 2018, renewal notifications will be sent via email rather than through USPS. Please ensure you have a current email on file to avoid missing important information.

Confidentiality and Nondisclosure Notice: This email message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by reply email and delete and/or destroy all copies of the original message.

To ensure compliance with the open meeting law, recipients of this message should not forward it to other members of the public body. Members of the public body may reply to this message, but they should not send a copy of their reply to other members.

From: [Emily Rajakovich](#) on behalf of [Emily Rajakovich <erajakovich@az.gov>](#)
To: [Emily Rajakovich](#)
Bcc: [Melissa Cornelius](#); [Sam J. Barcelona](#); [Kimberly Scoplitte](#); [Monica Petersen](#); [Heather Broaddus](#); [Lindsey Castro](#); [Ryan Edmonson](#); [Judith Stapley](#); [Gail Anthony](#); [Margaret Whelan](#); [Justin Bohall](#); [Karen Donahue](#); [Jenna Jones](#); [Victoria Whitmore](#); [David Geriminsky](#); [Tobi Zavala](#); [Karen Whiteford](#); [John Confer](#)
Subject: HB2569/Universal Recognition Implementation
Date: Friday, August 2, 2019 12:01:59 PM
Attachments: [2569 Implementation Checklist.pdf](#)

Dear Executive Directors-

Thank you so much for the meetings and conversations over the last several weeks on the implementation of HB2569--universal recognition of occupational/professional licenses. I appreciate the time each of you are putting into the implementation of this new law and all legislation that impacts your boards from this past legislative session. I write with a few quick follow-ups from our meetings on universal recognition.

First off, I am attaching the latest version of the one-pager I used during our meetings. I expanded upon a few things based on the conversations and hope this document is helpful.

Website language

Additionally, below is website language that should be used to explain the policy. **Please post it on your board's homepage.** My goal is to create uniformity; however, you may find it necessary to tweak the language to best align with your board's processes and terms what will be familiar with your applicants.

Applications

I know the boards utilizing the e-licensing system are working with ASET on system change requirements now. Until all changes for universal recognition licensure are fully implemented, please develop a plan B for accepting and tracking applications that will be ready by August 27. A fillable PDF or other secure online forms are good options in the short term to collect the information you need. All boards are expected to begin accepting and reviewing applications for universal recognition on August 27.

Finally, we will be eager to report on successes in issuing licenses under universal recognition. I know there are already some pending applications for universal recognition out there--great news! It will be important for each board to collect data on the number of applications *received* and *granted* under the new universal recognition policy. I will be following up regularly for a count.

Please let me know how I can be of help in these final weeks of implementation--and feel free to check in with questions or updates.

Thank you!
Emily Rajakovich

DRAFT WEBSITE LANGUAGE--*please put board-specific information in yellow highlighted areas.*

Licensure by Universal Recognition

On August 27, 2019 the **(NAME OF BOARD)** will begin accepting applications for licensure by universal recognition.

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- Prove residency in Arizona.
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(Provide link to application or best next step)

--

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Director, Boards and Commissions

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From: [Emily Rajakovich](#) on behalf of [Emily Rajakovich <erajakovich@az.gov>](#)
To: [Thomas Aughterton](#)
Subject: Fwd: HB2569/Universal Recognition Implementation
Date: Friday, August 2, 2019 12:05:22 PM
Attachments: [2569 Implementation Checklist.pdf](#)

Tom-

I just wanted to check in on legislation implementation since you are still relatively new in your role. I sent the below email to executive directors this morning but wanted to check in with you personally. Would you like to meet in person to further discuss implementation of universal recognition (HB2569) or any other policy? Please just let me know how I can be helpful.

Emily

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

From: **Emily Rajakovich** <erajakovich@az.gov>
Date: Fri, Aug 2, 2019 at 12:01 PM
Subject: HB2569/Universal Recognition Implementation
To: Emily Rajakovich <erajakovich@az.gov>

Dear Executive Directors-

Thank you so much for the meetings and conversations over the last several weeks on the implementation of HB2569--universal recognition of occupational/professional licenses. I appreciate the time each of you are putting into the implementation of this new law and all legislation that impacts your boards from this past legislative session. I write with a few quick follow-ups from our meetings on universal recognition.

First off, I am attaching the latest version of the one-pager I used during our meetings. I expanded upon a few things based on the conversations and hope this document is helpful.

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(Provide link to application or best next step)

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Emily Rajakovich | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions

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From: [Emily Rajakovich](#) on behalf of [Emily Rajakovich <erajakovich@az.gov>](#)
To: [Patricia McSorley](#)
Subject: Fwd: HB2569/Universal Recognition Implementation
Date: Friday, August 2, 2019 12:10:27 PM
Attachments: [2569 Implementation Checklist.pdf](#)

Pat-

Hope you are well. Just sharing the below info on 2569 I sent to board EDs early today. It applies mostly to the boards on the e-licensing system but wanted to share with you as well. It includes language that you can share on the MD and PA websites. I know each of these professions have their own nuances for licensure so let me know if changes need to be made to that website language. What else can I do to be helpful in implementation of universal recognition or any other legislation that impacts your boards? Let me know if a phone call is better.

Many, many thanks.

Emily

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

From: **Emily Rajakovich** <erajakovich@az.gov>
Date: Fri, Aug 2, 2019 at 12:01 PM
Subject: HB2569/Universal Recognition Implementation
To: Emily Rajakovich <erajakovich@az.gov>

Dear Executive Directors-

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(Provide link to application or best next step)

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Director, Boards and Commissions

www.azgovernor.gov

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Emily Rajakovich | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions

www.azgovernor.gov

From: [Emily Rajakovich](#) on behalf of [Emily Rajakovich <erajakovich@az.gov>](#)
To: [Kamlesh Gandhi](#)
Subject: Fwd: HB2569/Universal Recognition Implementation
Date: Friday, August 2, 2019 12:16:24 PM
Attachments: [2569 Implementation Checklist.pdf](#)

Hi Kam-

I know you and I have spoken a few times on "universal recognition" (HB2569) and that the Pharmacy Board already has a version of the policy that should make it relatively easy for you to implement. Just keeping you in the loop for the information I sent to other executive directors today. See the email below. It applies mostly to the boards on the e-licensing system but wanted to share with you as well. It also includes language to add on the Pharmacy Board website. I know you already have a notice about the effective date on your website, which is great.

What else can I do to be helpful in implementation of universal recognition or any other legislation that impacts your boards? Let me know if a phone call is better.

Many, many thanks.

Emily

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

From: **Emily Rajakovich** <erajakovich@az.gov>
Date: Fri, Aug 2, 2019 at 12:01 PM
Subject: HB2569/Universal Recognition Implementation
To: Emily Rajakovich <erajakovich@az.gov>

Dear Executive Directors-

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(Provide link to application or best next step)

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Director, Boards and Commissions

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From: [Kimberly Scoplitte](#) on behalf of [Kimberly Scoplitte <kscoplitte@azboc.gov>](#)
To: [Emily Rajakovich](#)
Subject: Re: HB2569/Universal Recognition Implementation
Date: Friday, August 2, 2019 12:32:59 PM

Good afternoon Emily,

Thank you for the information which is very helpful. I do have one question and I believe we have spoken on this before however, under the list "To qualify, an applicant must:" it is indicated "Take and pass any applicable exam on Arizona law". With that requirement does that mean applicants need to take the Infection Protection/Law Review class that applicants are required to take under our current reciprocity. I know through our conversations you have indicated that they would not, I just want to be clear as that requirement sounds contrary to what we have discussed. Please advise.

Sincerely,

Kimberly Scoplitte
Executive Director
Arizona State Board of Cosmetology
1740 W. Adams
Phoenix, AZ 85007

kscoplitte@azboc.gov

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On Fri, Aug 2, 2019 at 12:02 PM Emily Rajakovich <erajakovich@az.gov> wrote:

Dear Executive Directors-

Thank you so much for the meetings and conversations over the last several weeks on the implementation of HB2569--universal recognition of occupational/professional licenses. I appreciate the time each of you are putting into the implementation of this new law and all legislation that impacts your boards from this past legislative session. I write with a few quick follow-ups from our meetings on universal recognition.

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(Provide link to application or best next step)

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Director, Boards and Commissions

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From: [Emily Rajakovich](#) on behalf of [Emily Rajakovich <erajakovich@az.gov>](#)
To: [Joey Ridenour](#)
Subject: Fwd: HB2569/Universal Recognition Implementation
Date: Friday, August 2, 2019 3:10:29 PM
Attachments: [2569 Implementation Checklist.pdf](#)

Hi Joey-

Hope you are well. Just sharing the below info on 2569 I sent to board EDs early today. It applies mostly to the boards on the e-licensing system but wanted to share with you as well. It includes language that you can share on the Nursing Board website. I know there will be some special nuances for licensure with the Interstate Compact so let me know if changes need to be made to that website language. What else can I do to be helpful in implementation of universal recognition or any other legislation that impacts your boards? Let me know if a phone call is better.

Many, many thanks.

Emily

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

From: **Emily Rajakovich** <erajakovich@az.gov>
Date: Fri, Aug 2, 2019 at 12:01 PM
Subject: HB2569/Universal Recognition Implementation
To: Emily Rajakovich <erajakovich@az.gov>

Dear Executive Directors-

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Thank you!
Emily Rajakovich

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Director, Boards and Commissions

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From: [Emily Rajakovich](mailto:erajakovich@az.gov) on behalf of [Emily Rajakovich <erajakovich@az.gov>](mailto:erajakovich@az.gov)
To: [Kimberly Scoplitte](mailto:kscoplitte@azboc.gov)
Subject: Re: HB2569/Universal Recognition Implementation
Date: Sunday, August 4, 2019 11:07:07 AM

Hi Kimberly-

Thanks for your diligence on this. Yes, I recall that conversation and my impression at the time is that applicants under universal recognition would not need to take the exam based on my understanding of the exam. However, I would confirm with your AG if they have not provided advice already. I really appreciate all your work, again. Keep me posted.

Also--what else do you need from me for the blow dry exemption legislation? I recall you were working on that implementation, too.

Emily

On Fri, Aug 2, 2019 at 12:32 PM Kimberly Scoplitte <kscoplitte@azboc.gov> wrote:

Good afternoon Emily,

Thank you for the information which is very helpful. I do have one question and I believe we have spoken on this before however, under the list "To qualify, an applicant must:" it is indicated "Take and pass any applicable exam on Arizona law". With that requirement does that mean applicants need to take the Infection Protection/Law Review class that applicants are required to take under our current reciprocity. I know through our conversations you have indicated that they would not, I just want to be clear as that requirement sounds contrary to what we have discussed. Please advise.

Sincerely,

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Arizona State Board of Cosmetology
1740 W. Adams
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kscoplitte@azboc.gov

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On Fri, Aug 2, 2019 at 12:02 PM Emily Rajakovich <erajakovich@az.gov> wrote:

Dear Executive Directors-

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Emily Rajakovich | **Office of Arizona Governor Doug Ducey**

Director, Boards and Commissions

602.974.4600

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Emily Rajakovich | **Office of Arizona Governor Doug Ducey**

Director, Boards and Commissions

602.974.4600

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From: [Ryan Edmonson](#) on behalf of [Ryan Edmonson <ryan.edmonson@dentalboard.az.gov>](#)
To: [Emily Rajakovich](#)
Cc: [Kristina Gomez](#)
Subject: Re: HB2569/Universal Recognition Implementation
Date: Monday, August 5, 2019 1:02:56 PM

Good Afternoon Emily,

Thank you for your follow up email. It's clear and concise and I appreciate your efforts. You have been a gem to work alongside.

One quick note that I would like to add to our website language will be to reference US jurisdiction versus state since there are five US territories who license professionals as well. That said, if you don't think that this new law covers all US jurisdictions, I will leave it as state?

Respectfully,

Ryan Edmonson

Executive Director



Arizona State Board of Dental Examiners
1740 West Adams Street, Suite 2470, Phoenix, AZ
85007

E: ryan.edmonson@dentalboard.az.gov
W: <https://dentalboard.az.gov/>

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On Fri, Aug 2, 2019 at 12:02 PM Emily Rajakovich <erajakovich@az.gov> wrote:

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(Provide link to application or best next step)

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Emily Rajakovich | **Office of Arizona Governor Doug Ducey**
Director, Boards and Commissions
www.azgovernor.gov

From: [Emily Rajakovich](#) on behalf of [Emily Rajakovich <erajakovich@az.gov>](#)
To: [Ryan Edmonson](#)
Subject: Re: HB2569/Universal Recognition Implementation
Date: Wednesday, August 7, 2019 9:51:37 AM

Thanks, Ryan. I believe you are correct on the jurisdiction issue. Please change as you see appropriate and guided by AG. Hope you are well!
Emily

On Mon, Aug 5, 2019 at 1:02 PM Ryan Edmonson <ryan.edmonson@dentalboard.az.gov> wrote:

Good Afternoon Emily,

Thank you for your follow up email. It's clear and concise and I appreciate your efforts. You have been a gem to work alongside.

One quick note that I would like to add to our website language will be to reference US jurisdiction versus state since there are five US territories who license professionals as well. That said, if you don't think that this new law covers all US jurisdictions, I will leave it as state?

Respectfully,

Ryan Edmonson

Executive Director



Arizona State Board of Dental Examiners
1740 West Adams Street, Suite 2470, Phoenix, AZ
85007

E: ryan.edmonson@dentalboard.az.gov
W: <https://dentalboard.az.gov/>

Confidentiality and Non-disclosure Notice: This email message, including any attachments, is for the sole purpose of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by reply email and delete and/or destroy all copies of the original message.

On Fri, Aug 2, 2019 at 12:02 PM Emily Rajakovich <erajakovich@az.gov> wrote:

Dear Executive Directors-

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Please let me know how I can be of help in these final weeks of implementation--and feel free to check in with questions or updates.

Thank you!
Emily Rajakovich

DRAFT WEBSITE LANGUAGE--*please put board-specific information in yellow highlighted areas.*

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(Provide link to application or best next step)

--

Emily Rajakovich | **Office of Arizona Governor Doug Ducey**
Director, Boards and Commissions

www.azgovernor.gov

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Emily Rajakovich | **Office of Arizona Governor Doug Ducey**
Director, Boards and Commissions

www.azgovernor.gov

From: [Emily Rajakovich](#) on behalf of [Emily Rajakovich <erajakovich@az.gov>](#)
To: [Brandon Kent](#); [Shelley Witt](#)
Subject: Re: Request for Time
Date: Monday, August 12, 2019 2:00:53 PM

Brandon

Thanks for this comprehensive follow-up! Great news about the testing phase for universal recognition.

Yes, let's get time to discuss the Psychology Board. Shelley is copied here--I think Thursday or Friday will work best.

On Mon, Aug 12, 2019 at 12:50 PM Brandon Kent <brandon.kent@azdoa.gov> wrote:

Hello Emily,

I wanted to see about getting some time with you to discuss Board of Psychologies Medical Examiners special line item from last year that allotted additional funds to the board for use on eLicense enhancements. With Jenna Jones leaving, she is looking to use this money for other purposes that do not fall under the same classification. I'd like to discuss some options that I believe will help the board to put to better use the system in which they are only partially using. Please let me know if you'd like to discuss this further.

On a similar note:

We have completed many of the designs for agencies to begin testing the "Universal License Recognition" this week. Our ask is to get feedback from agencies by EOD Wednesday so that we may make adjustments and have a 2nd round of testing take place next week before pushing into the live environment. At this time, we believe only three agencies will need to utilize a PDF on the website as we enter the 27th of August. (Psychology, Respiratory & Financial Institutions)

Reasoning:

Psychology has turned off all of their applications and created an intake process via PDF. As a result, we determined that we should be focused on fixing the process before using it to design additional applications.

Respiratory has not gone live with their use of the system. As a result, the effort to turn this feature on is much larger than adding a new license type

Financial Institutions: has not provided us with requirements and feels that their "reciprocity" license covers the universal requirements.

thanks,

[Brandon Kent](#)

[Sr. Engagement Manager - ASET - Business Engineering](#)

[Department of Administration | State of Arizona](#)

Brandon.Kent@azdoa.gov

How am I doing? Please take a moment to answer a few questions.

[CLICK HERE FOR SURVEY](#)

--

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Director, Boards and Commissions

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From: [Emily Rajakovich](#) on behalf of [Emily Rajakovich <erajakovich@az.gov>](#)
To: [Emily Rajakovich](#)
Bcc: [Melissa Cornelius](#); [Sam J. Barcelona](#); [Kimberly Scoplitte](#); [Monica Petersen](#); [Heather Broaddus](#); [Lindsey Castro](#); [Ryan Edmonson](#); [Judith Stapley](#); [Gail Anthony](#); [Margaret Whelan](#); [Justin Bohall](#); [Karen Donahue](#); [Jenna Jones](#); [Victoria Whitmore](#); [David Geriminsky](#); [Tobi Zavala](#); [Karen Whiteford](#); [John Confer](#); [Martin Kollasch](#)
Subject: Re: HB2569/Universal Recognition Implementation
Date: Thursday, August 22, 2019 10:30:44 AM

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Emily Rajakovich | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions
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www.azgovernor.gov

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Emily Rajakovich | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions

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From: [Emily Rajakovich](#) on behalf of [Emily Rajakovich <erajakovich@az.gov>](#)
To: [Emily Rajakovich](#)
Bcc: [Kamlesh Gandhi](#); [Joey Ridenour](#); [Patricia McSorley](#)
Subject: Fwd: HB2569/Universal Recognition Implementation
Date: Thursday, August 22, 2019 10:32:02 AM

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Emily Rajakovich | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions

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From: [Ryan Edmonson](#) on behalf of [Ryan Edmonson <ryan.edmonson@dentalboard.az.gov>](#)
To: [Emily Rajakovich](#)
Cc: [Kristina Gomez](#); [Sherrie Biggs](#)
Subject: Re: HB2569/Universal Recognition Implementation
Date: Thursday, August 22, 2019 10:43:16 AM

Thank you Emily for your email. I would just like provide you with the update that the Dental Board has already posted the website language and we will be adding a new and much better initial application to the Board's website on Tuesday morning. The new application will be more user friendly, including an online submission and payment, but more importantly, it will provide the option for individuals to be able to apply through the Governor's universal recognition pathway.

Respectfully,

Ryan Edmonson

Executive Director



Arizona State Board of Dental Examiners
1740 West Adams Street, Suite 2470, Phoenix, AZ
85007

E: ryan.edmonson@dentalboard.az.gov
W: <https://dentalboard.az.gov/>

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Director, Boards and Commissions

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From: [John Confer](#) on behalf of [John Confer <john@rb.az.gov>](#)
To: [Emily Rajakovich](#)
Subject: Re: HB2569/Universal Recognition Implementation
Date: Thursday, August 22, 2019 10:47:37 AM

Hi Emily,

Do you have a "logo" or any specific branding (picture) that you would like associated with the universal licensing pathway? I remember the RedTape campaign and we used that logo on our website.

Thanks

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Jack Confer

Executive Director

Arizona Board of Respiratory Care Examiners

1740 West Adams Street, Suite 3406

Phoenix, AZ 85007

Suggestions? Comments? Survey here: <https://respiratoryboard.az.gov/survey>

From: [Emily Rajakovich](#) on behalf of [Emily Rajakovich <erajakovich@az.gov>](#)
To: [John Confer](#)
Subject: Re: HB2569/Universal Recognition Implementation
Date: Thursday, August 22, 2019 10:49:46 AM

Great question. Not at this time but I will keep you posted. I appreciate all the work you are doing on this!

Emily

On Thu, Aug 22, 2019 at 10:47 AM John Confer <john@rb.az.gov> wrote:

Hi Emily,

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Jack Confer

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From: [Theresa Bunch](#) on behalf of [Theresa Bunch <tbunch@azboc.gov>](mailto:tbunch@azboc.gov)
To: [Emily Rajakovich](#)
Cc: [Kim Scoplitte](#)
Subject: Universal Recognition - Website Question
Date: Thursday, August 22, 2019 12:50:20 PM

Good Afternoon Emily

Just a quick question, I will be posting the information about the "Universal Recognition License" on the agencies front page of the website. Underneath the "Universal Recognition License" information, I would like to post the agencies other pathway "Licensing by Reciprocity" information too. This way it will explain the two different pathways of licensing to make sure our clients could licensed quicker and to be working in a short amount of time. Just wanting to make sure it is clear to the public. Please advise

Thank you for your time.

Theresa Bunch

**Deputy Director
Arizona State Board of Cosmetology**

1740 W Adams Suite #4400
Phoenix AZ 85007

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From: [Emily Rajakovich](#) on behalf of [Emily Rajakovich <erajakovich@az.gov>](#)
To: [Melissa Cornelius](#)
Cc: [Gretchen Conger](#)
Subject: Re: Board of Technical Registration Request to Enter Rulemaking
Date: Friday, August 23, 2019 1:32:30 PM

Melissa-

Thank you for following up and giving us the opportunity to review the rulemaking request package. I appreciate the thoughtfulness of the package and ideas. This email serves as rulemaking approval pursuant to Executive Order 2019-01 for your requests related to R4-30-106 (Fees) and R4-30-247 (Home Inspector Certifications).

At this time, the request for changes to R4-30-101(16) and for a newly created "retired status" are not approved. Our office finds that there are avenues for the board to effectively license and regulate without adding to the administrative code on these two topics.

Please also keep me updated on any rulemaking requirements as the board implements universal recognition (HB2569), as you mentioned in your cover letter.

As always, I welcome continued conversation on the agency and your processes. Thank you for the work you do--and extend my sentiments to Patty, as well.

Emily Rajakovich

On Wed, Jul 24, 2019 at 4:59 PM Melissa Cornelius <melissa.cornelius@azbtr.gov> wrote:

Hi Emily,

Ireland was beautiful--I will happily share photos with you, if you wish!

To your question regarding 'retired' status, the law in place now only allows for registrants to go 'inactive,' (A.R.S. § 32-127(E)) which they can do simply by sending us notice in writing. When staff receives these requests, we record them in the 'notes' fields in our computer system--we don't charge a fee for someone to go inactive and we have no plans to charge a fee to 'retire' from practice if allowed to enter into rulemaking.

As an aside, (and at the risk of raising more questions from you!) a person who has previously placed their license on 'inactive status' with the Board can request to reactivate that license pursuant to § 32-127(H). The statute requires that the person must complete a reactivation application and, if they have been out of practice for more than 5 years, they must take and pass the applicable professional competency examination.

We hope by creating an actual 'retirement' rule, we can distinguish between those who really wish to retire from practice and those who just simply move out of state but who might like to reactivate their licenses and return to work in subsequent years.

I hope this brief explanation answers your questions about our requested rule-making. Please let me know if you have further questions.

Melissa Cornelius, Executive Director
Arizona Board of Technical Registration
1110 W. Washington, Ste. 240

Phoenix, AZ 85007

This message and any attachments are intended only for the use of the individual or entity to which they are addressed. If the reader of this message or an attachment is not the intended recipient or the employee or agent responsible for delivering the message or attachment to the intended recipient you are hereby notified that any dissemination, distribution or copying of this message or any attachment is strictly prohibited. If you have received this communication in error, please notify us immediately by replying to the sender. The information transmitted in this message and any attachments may be privileged, is intended only for the personal and confidential use of the intended recipients, and is covered by the Electronic Communications Privacy Act, 18 U.S.C. §2510-2521.

On Mon, Jul 15, 2019 at 11:05 AM Patrice Pritzl <patrice.pritzl@azbtr.gov> wrote:
good morning Emily. Melissa has been doing the research and drafting of the retirement rule, so I think it best to leave it to her to respond to your questions. She gets back on the 22nd and we have a Board meeting on the 23rd, so it is possible that she may not respond until the 24th. I just wanted to give you a heads up so you know it did not get lost in spam or trash.
Sincerely,
Patrice Pritzl
Deputy Director
AZ Board of Technical Registration

On Fri, Jul 12, 2019 at 4:58 PM Emily Rajakovich <erajakovich@az.gov> wrote:
Hi Melissa and Patty-
No rush on this since I know, Melissa, you are still in Ireland. Hope it's a great time. I just have a clarifying question on the retired status proposal in the rulemaking exemption request.

Would the new "retired" status mean a lower (or no) fee level for the individual? In other words, what does this mean for fees? Can you expand on what the board does not for people who are retired now? Do those individuals just de-activate their license or let it lapse?
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On Tue, Jul 2, 2019 at 10:27 AM Melissa Cornelius <melissa.cornelius@azbtr.gov> wrote:

Hi Emily,

Please find attached the Board's request to enter rulemaking to address inevitable questions about the implementation of HB2569 and other 'housekeeping' issues that have arisen since the Board last had its rules updated in 2018. Please contact me or Patti if you have any questions. (I will be in Ireland until July 22!)

Have a Happy 4th of July.

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Emily Rajakovich | **Office of Arizona Governor Doug Ducey**
Director, Boards and Commissions

www.azgovernor.gov

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Emily Rajakovich | **Office of Arizona Governor Doug Ducey**
Director, Boards and Commissions

www.azgovernor.gov

From: [Melissa Cornelius](#) on behalf of [Melissa Cornelius <melissa.cornelius@azbtr.gov>](#)
To: [Emily Rajakovich](#)
Cc: [Gretchen Conger](#); [Patrice Pritzl \(Patrice.Pritzl@azbtr.gov\)](#)
Subject: Re: Board of Technical Registration Request to Enter Rulemaking
Date: Monday, August 26, 2019 9:37:36 AM

Thank you for your response, Emily. We will keep you informed about our rulemaking efforts.

Melissa Cornelius, Executive Director
Arizona Board of Technical Registration
1110 W. Washington, Ste. 240
Phoenix, AZ 85007

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Emily Rajakovich | **Office of Arizona Governor Doug Ducey**
Director, Boards and Commissions

(602) 542-4473

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--

Emily Rajakovich | **Office of Arizona Governor Doug Ducey**
Director, Boards and Commissions

(602) 542-4473

www.azgovernor.gov

From: [Emily Rajakovich](#) on behalf of [Emily Rajakovich <erajakovich@az.gov>](#)
To: [Margaret Whelan](#)
Subject: Fwd: HB2569/Universal Recognition Implementation
Date: Tuesday, August 27, 2019 11:45:30 AM
Attachments: [2569 Implementation Checklist.pdf](#)

Hi Margaret,

Just checking in on implementation of universal recognition. I saw that your board's application has a "universal recognition" option in the e-licensing application--which is great! However, I was looking for language on Optometry website and wasn't able to find information on the policy change to guide candidates. Would you send me the link where doctors can find out about how to apply under universal recognition on your website? My apologies if I missed it. My goal is for all boards to have similar language (provided below) posted prominently on each website. I imagine this language could go under the "announcements" section on your website or as part of the cover letter at this link: <https://optometry.az.gov/licensing>

Thank you!
Emily

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

From: **Emily Rajakovich** <erajakovich@az.gov>
Date: Fri, Aug 2, 2019 at 12:01 PM
Subject: HB2569/Universal Recognition Implementation
To: Emily Rajakovich <erajakovich@az.gov>

Dear Executive Directors-

Thank you so much for the meetings and conversations over the last several weeks on the implementation of HB2569--universal recognition of occupational/professional licenses. I appreciate the time each of you are putting into the implementation of this new law and all legislation that impacts your boards from this past legislative session. I write with a few quick follow-ups from our meetings on universal recognition.

First off, I am attaching the latest version of the one-pager I used during our meetings. I expanded upon a few things based on the conversations and hope this document is helpful.

Website language

Additionally, below is website language that should be used to explain the policy. **Please post it on your board's homepage.** My goal is to create uniformity; however, you may find it necessary to tweak the language to best align with your board's processes and terms what will be familiar with your applicants.

Applications

I know the boards utilizing the e-licensing system are working with ASET on system change requirements now. Until all changes for universal recognition licensure are fully implemented, please develop a plan B for accepting and tracking applications that will be ready by August 27. A fillable PDF or other secure online forms are good options in the short term to collect the information you need. All boards are expected to begin accepting and reviewing applications for universal recognition on August 27.

Finally, we will be eager to report on successes in issuing licenses under universal recognition. I know there are already some pending applications for universal recognition out there--great news! It will be important for each board to collect data on the number of applications *received* and *granted* under the new universal recognition policy. I will be following up regularly for a count.

Please let me know how I can be of help in these final weeks of implementation--and feel free to check in with questions or updates.

Thank you!
Emily Rajakovich

DRAFT WEBSITE LANGUAGE--*please put board-specific information in yellow highlighted areas.*

Licensure by Universal Recognition

On August 27, 2019 the **(NAME OF BOARD)** will begin accepting applications for licensure by universal recognition.

The universal recognition policy allows Arizona residents to use an out-of-state professional or occupational license to qualify for an Arizona license to work. To qualify, an applicant must:

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- Be in good standing in all states where currently or previously licensed or certified.
- Have met all applicable education, work, exam, and/or clinical supervision requirements in the other state where originally licensed or certified.
- Complete a criminal background check when required by law.
- Take and pass any applicable exam on Arizona state law.
- Pay all applicable fees to the **(NAME OF BOARD)**

(Provide link to application or best next step)

--

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UNIVERSAL RECOGNITION: HB2569 Implementation

What the new law does:

Under the new law, Arizona's licensing boards will recognize out-of-state occupational licenses for people who:

- Have been licensed in their profession for at least one year
- Are in good standing in all states where they are licensed
- Do not have any past or pending investigations or complaints
- Pay applicable Arizona fees
- Meet all residency, testing, and background check requirements per law.

Individuals seeking to work in occupations that require a background check will still need to complete those background checks. In addition, professionals receiving licenses under the new law can only become licensed in practice within areas they have been trained and certified to practice in their original state. Arizona licensing boards will be required to verify that an individual is in good standing in all states where they are licensed.

Individual boards may have several pathways to licensure already in statute (interstate compact, licensure by endorsement, reciprocity, etc.). There are various pathways to licensure. Universal recognition is not meant to be the replace these pathways licensure, but represents an important new pathway that broadens the options available.

What the new law does not do:

The new law DOES NOT recognize other states' occupational licenses automatically. For example, workers licensed in other states who move to Arizona still must apply for a license through the appropriate Arizona licensing board before working. However, under the new law, workers will not be required to duplicate training and other requirements that often needlessly delay or prevent them from getting to work.

Implementation

We are asking that language we provide gets placed on all applicable websites and forms. We expect boards to work with their Assistant Attorney Generals to determine how they should roll out the law. Additionally, if necessary, we are asking that boards do a staff training to ensure staff readiness to process applications and answer applicant/licensee questions.

Things to do:

- Add informational language to all **FORMS** that include application information (FAQs, brochures, checklists, etc.)
- Add a question or information regarding universal recognition directly on the **APPLICATION**
- Add informational language to board **WEBSITE**
- Conduct any necessary **STAFF TRAINING** to ensure staff ready to process applications and answer questions on the legislation

From: [Emily Rajakovich](#) on behalf of [Emily Rajakovich <erajakovich@az.gov>](#)
To: [James Knupp](#)
Cc: [Patrick Ptak](#)
Subject: Re: 1 - Cronkite News Questions - Universal Recognition Bill
Date: Tuesday, August 27, 2019 1:28:52 PM

Thank you, Jim. Great information to provide.

Patrick--would it be helpful to direct her to Dental Board as another good option?

Emily

On Tue, Aug 27, 2019 at 12:54 PM James Knupp <jim.knupp@roc.az.gov> wrote:

Cronkite student Amy Depaola, 562.505.0456, is calling boards and commissions to answer questions on impact of the universal recognition bill.

I returned her call. Below are her questions and generally my answers. I called Emily to give her a heads-up.

How many licensees do we have? 40k

Why is it important to have construction be licensed? Statute charges us with protecting the health, safety and welfare of the public and we do that by ensuring applicants meet minimum knowledge and experience requirements. Basically, we are ensuring they possess the knowledge and ability to complete the work they're contracting for.

What portion of our applications are from out of state? Just over 10 %

Is the number of applications increasing? Yes all of construction is currently growing in the state.

Are the number of applicants from out of state increasing over the passed several years? I don't have those numbers readily available.

Could I comment on the impact of the recognition bill? The ROC possesses a couple waivers already for those licensed in this state and out of state. The bill reduces additional burdens while still requiring minimum knowledge and experience be met.

I'm reading a study that says licensing helps people who lack higher education make higher wages, could you comment? I don't believe the ROC is going to fit into the narrative of the study you're reading as we issue business licenses to corporations and sole proprietorships; not individuals.

--

Emily Rajakovich | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions

www.azgovernor.gov

From: [Emily Rajakovich](#) on behalf of [Emily Rajakovich <erajakovich@az.gov>](#)
To: [Monica Petersen](#)
Subject: Re: HB2569/Universal Recognition Implementation
Date: Wednesday, August 28, 2019 10:28:26 AM

Excellent thank you! Could you send me the link where applicants find the information? I am sharing this information within our office.

Very much appreciated!

Emily

On Tue, Aug 27, 2019 at 3:34 PM Monica Petersen <mpetersen@azaccountancy.gov> wrote:
Emily,

Our website updates are completed and active as of today.

Monica L. Petersen
Executive Director
Arizona State Board of Accountancy
100 N. 15th Ave., Suite 165
Phoenix, AZ 85007

On Thu, Aug 22, 2019 at 10:30 AM Emily Rajakovich <erajakovich@az.gov> wrote:

Dear Executive Directors,

As you know, the effectiveness date for the all legislation is next Tuesday, August 27.

Thank you for all the work you have done these past few months to prepare your agency for changes.

If you have not already done so, please make sure your websites are updated with information regarding universal recognition of occupational/professional licenses (HB2569). **Please see the exact language at the bottom of this email, which I sent out earlier. The text should be placed prominently on your website.** As I mentioned, you may tweak the language to align with your board's specific processes or terms what will be more familiar to your applicants.

The expectation is that each board is ready to begin accepting applications and granting licenses under universal recognition next Tuesday.

I welcome updates on licenses granted by your board under universal recognition. Please also keep me apprised of issues or questions that come up on universal recognition or any of the new laws effective next week.

Many thanks again for your ongoing commitment to making implementation of all legislation a success.

Emily Rajakovich

On Fri, Aug 2, 2019 at 12:01 PM Emily Rajakovich <erajakovich@az.gov> wrote:

Dear Executive Directors-

Thank you so much for the meetings and conversations over the last several weeks on

the implementation of HB2569--universal recognition of occupational/professional licenses. I appreciate the time each of you are putting into the implementation of this new law and all legislation that impacts your boards from this past legislative session. I write with a few quick follow-ups from our meetings on universal recognition.

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Please let me know how I can be of help in these final weeks of implementation--and feel free to check in with questions or updates.

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From: [Margaret Whelan](#) on behalf of [Margaret Whelan <margaret.whelan@optometry.az.gov>](#)
To: [Emily Rajakovich](#)
Subject: Re: HB2569/Universal Recognition Implementation
Date: Wednesday, August 28, 2019 12:43:37 PM

Hi Emily,

It's under the eLicensing link along with the all of the options for licensure.
:)

Please let me know if I can be of further assistance.

Margaret Whelan, Executive Director
Arizona State Board of Optometry
www.optometry.az.gov

Fax (602) 883-7253

On Tue, Aug 27, 2019 at 11:45 AM Emily Rajakovich <erajakovich@az.gov> wrote:

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Director, Boards and Commissions

www.azgovernor.gov

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Director, Boards and Commissions

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From: [Monica Petersen](#) on behalf of [Monica Petersen <mpetersen@azaccountancy.gov>](#)
To: [Emily Rajakovich](#)
Subject: Re: HB2569/Universal Recognition Implementation
Date: Wednesday, August 28, 2019 12:46:48 PM

https://www.azaccountancy.gov/General/News_And_Updates.aspx

https://www.azaccountancy.gov/Certification/Laws2011Ch240_2019Ch55.aspx

Monica L. Petersen
Executive Director
Arizona State Board of Accountancy
100 N. 15th Ave., Suite 165
Phoenix, AZ 85007

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As you know, the effectiveness date for the all legislation is next Tuesday, August 27.
Thank you for all the work you have done these past few months to prepare your agency for changes.

If you have not already done so, please make sure your websites are updated with information regarding universal recognition of occupational/professional licenses (HB2569). **Please see the exact language at the bottom of this email, which I sent out earlier. The text should be placed prominently on your website.** As I mentioned, you may tweak the language to align with your board's specific processes or terms what will be more familiar to your applicants.

The expectation is that each board is ready to begin accepting applications and granting licenses under universal recognition next Tuesday.

I welcome updates on licenses granted by your board under universal recognition. Please also keep me apprised of issues or questions that come up on universal recognition or any of the new laws effective next week.

Many thanks again for your ongoing commitment to making implementation of all legislation a success.

Emily Rajakovich

On Fri, Aug 2, 2019 at 12:01 PM Emily Rajakovich <erajakovich@az.gov> wrote:

Dear Executive Directors-

Thank you so much for the meetings and conversations over the last several weeks on the implementation of HB2569--universal recognition of occupational/professional licenses. I appreciate the time each of you are putting into the implementation of this new law and all legislation that impacts your boards from this past legislative session. I write with a few quick follow-ups from our meetings on universal recognition.

First off, I am attaching the latest version of the one-pager I used during our meetings. I expanded upon a few things based on the conversations and hope this document is helpful.

Website language

Additionally, below is website language that should be used to explain the policy.

Please post it on your board's homepage. My goal is to create uniformity; however, you may find it necessary to tweak the language to best align with your board's processes and terms what will be familiar with your applicants.

Applications

I know the boards utilizing the e-licensing system are working with ASET on system change requirements now. Until all changes for universal recognition licensure are fully implemented, please develop a plan B for accepting and tracking applications that will be ready by August 27. A fillable PDF or other secure online forms are good options in the short term to collect the information you need. All boards are expected to begin accepting and reviewing applications for universal recognition on August 27.

Finally, we will be eager to report on successes in issuing licenses under universal recognition. I know there are already some pending applications for universal recognition out there--great news! It will be important for each board to collect data on the number of applications *received* and *granted* under the new universal recognition policy. I will be following up regularly for a count.

Please let me know how I can be of help in these final weeks of implementation--and feel free to check in with questions or updates.

Thank you!

Emily Rajakovich

DRAFT WEBSITE LANGUAGE--*please put board-specific information in yellow highlighted areas.*

Licensure by Universal Recognition

On August 27, 2019 the **(NAME OF BOARD)** will begin accepting applications for licensure by universal recognition.

The universal recognition policy allows Arizona residents to use an out-of-state professional or occupational license to qualify for an Arizona license to work. To qualify, an applicant must:

- Prove residency in Arizona.
- Be currently licensed or certified for at least **one year** in another U.S. state in the discipline applied for and at the same level of practice as recognized in Arizona.
- Be in good standing in all states where currently or previously licensed or certified.
- Have met all applicable education, work, exam, and/or clinical supervision requirements in the other state where originally licensed or certified.
- Complete a criminal background check when required by law.
- Take and pass any applicable exam on Arizona state law.
- Pay all applicable fees to the **(NAME OF BOARD)**

(Provide link to application or best next step)

--

Emily Rajakovich | Office of Arizona Governor Doug Ducey

Director, Boards and Commissions

O. (602) 542-1308

www.azgovernor.gov

--

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From: [Emily Rajakovich](#) on behalf of [Emily Rajakovich <erajakovich@az.gov>](#)
To: [Kimberly Scoplitte](#); [ken.hand@greatclips.net](#)
Subject: Great Clips/Cosmetology Board Connection
Date: Thursday, September 26, 2019 2:36:59 PM

Hi Kim and Ken-

I am so pleased to be able to introduce and connect you both.

Ken: Kim Scoplitte serves as the executive director of the Arizona Cosmetology Board. She has a deep knowledge of the board and I have appreciated her partnership with our office.

Kim: Ken Hand is with Great Clips, a large employer of licensed cosmetologists in Arizona. I just had the opportunity to chat with him on a few issues. He has been in the cosmetology field for over 30 years and works nationwide on licensure issues. He mentioned his past good working relationship with the Arizona and ability to share ideas/seek feedback on the industry.

Kim-Can you find some time in your schedule soon to meet with him? I hope you will share more on the implementation of universal recognition and other priorities to you are working on for licensure. I think it will be a very helpful and productive connection for both of you.

Thank you both! Please let me know what else I can do to help with a meeting, etc. I appreciate all the work you both do.

Emily Rajakovich

--

Emily Rajakovich | **Office of Arizona Governor Doug Ducey**
Director, Boards and Commissions

www.azgovernor.gov

From: [Kimberly Scoplitte](#) on behalf of [Kimberly Scoplitte <kscoplitte@azboc.gov>](#)
To: [Emily Rajakovich](#)
Subject: Re: Great Clips/Cosmetology Board Connection
Date: Friday, September 27, 2019 7:00:35 AM

Good morning Emily,

I would enjoy meeting with Ken, I will look at my schedule and will contact him to set a date and time.

Sincerely,

Kimberly Scoplitte
Executive Director
Arizona State Board of Cosmetology
1740 W. Adams
Phoenix, AZ 85007

kscoplitte@azboc.gov

Confidentiality Notice: Information contained in this email may be confidential or privileged. It is intended only for the specified recipient(s). If you are not an intended recipient, please immediately notify the sender or contact the Arizona State Board of Cosmetology at 602-974-5100. If you are not the intended recipient, please be advised that any distribution, dissemination or copying of this communication is strictly prohibited.

On Thu, Sep 26, 2019 at 2:37 PM Emily Rajakovich <erajakovich@az.gov> wrote:

Hi Kim and Ken-

I am so pleased to be able to introduce and connect you both.

Ken: Kim Scoplitte serves as the executive director of the Arizona Cosmetology Board. She has a deep knowledge of the board and I have appreciated her partnership with our office.

Kim: Ken Hand is with Great Clips, a large employer of licensed cosmetologists in Arizona. I just had the opportunity to chat with him on a few issues. He has been in the cosmetology field for over 30 years and works nationwide on licensure issues. He mentioned his past good working relationship with the Arizona and ability to share ideas/seek feedback on the industry.

Kim-Can you find some time in your schedule soon to meet with him? I hope you will share more on the implementation of universal recognition and other priorities to you are working on for licensure. I think it will be a very helpful and productive connection for both of you.

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Emily Rajakovich

--

Emily Rajakovich | Office of Arizona Governor Doug Ducey

Director, Boards and Commissions

602.974.1000

www.azgovernor.gov

From: [Emily Rajakovich](#) on behalf of [Emily Rajakovich <erajakovich@az.gov>](mailto:erajakovich@az.gov)
To: [Jennifer Michaelsen](#)
Subject: Gandolfo correspondence
Date: Thursday, November 7, 2019 12:38:53 PM

Hi Jennifer-

I was able to discuss universal recognition with Dr. Bohanske yesterday. I am working on a solution. Could you please send me a copy of the letter sent by the board to Dr. Gandolfo? I am asking for the letter with the board's justification for denial and option for her to withdraw her application. I would like the chance to review the full letter.

Also, are there other applicants who will be denied universal recognition by the board? Please send me any correspondence to any/all other applicant regarding a potential denial for a license universal recognition.

I realize this may take time to collect, so the letter to Dr. Gandolfo can be sent before any other correspondence.

Let me know what questions you may have. Happy to discuss further and appreciate the time on it.

Many thanks,
Emily

--

Emily Rajakovich | **Office of Arizona Governor Doug Ducey**
Director, Boards and Commissions
617 North Central Expressway, Suite 1000
Phoenix, AZ 85004
www.azgovernor.gov

From: [Jennifer Michaelsen](#) on behalf of [Jennifer Michaelsen <jennifer.michaelsen@psychboard.az.gov>](#)
To: [Emily Rajakovich](#)
Subject: Re: Gandolfo correspondence
Date: Thursday, November 7, 2019 1:59:02 PM
Attachments: [Dr. Gandolfo Email.pdf](#)

Hi Emily,

Thank you for your email. I'm glad that you were able to speak with Dr. Bohanske regarding this matter.

In regards to Dr. Gandolfo's case, the Board reviewed her application at its meeting on 11/1/2019. I subsequently sent Dr. Gandolfo an email on the same date explaining the Board's decision and her options. Please note that I did not send Dr. Gandolfo a letter, just the email. My email to Dr. Gandolfo is attached. If Dr. Gandolfo determines that she does not want to withdraw her application, which is at her discretion, a Notice of Denial will then be mailed to her. The Notice would include the appeal information.

The Board has not denied any other universal recognition applications. There are 2 universal applications that the Board recently reviewed where additional information was requested from both applicants. Staff is waiting for these applicants to submit the requested information. However, I do not know if these applications will ultimately be approved or denied by the Board.

If you need any additional information, please let me know.

Sincerely,

Jennifer Michaelsen

Interim Executive Director

Fax: 602-542-8279

Please note that the Board staff is prohibited from providing legal advice or interpretation. Legal advice could be described, but is not limited to offering interpretation of statute or of rules; recommending a course of action; reviewing advertisement media for possible violations; predicting a board decision and interpreting the meaning or effect of any board order or other judgment.

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On Thu, Nov 7, 2019 at 12:39 PM Emily Rajakovich <erajakovich@az.gov> wrote:

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withdraw her application. I would like the chance to review the full letter.

Also, are there other applicants who will be denied universal recognition by the board?
Please send me any correspondence to any/all other applicant regarding a potential denial for a license universal recognition.

I realize this may take time to collect, so the letter to Dr. Gandolfo can be sent before any other correspondence.

Let me know what questions you may have. Happy to discuss further and appreciate the time on it.

Many thanks,
Emily

--

Emily Rajakovich | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions

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Jennifer Michaelsen <jennifer.michaelsen@psychboard.az.gov>

Board of Psychologist Examiners

Jennifer Michaelsen <jennifer.michaelsen@psychboard.az.gov>

Fri, Nov 1, 2019 at 3:24 PM

To: "carolgandolfc

Cc: Kathy Fowkes <kathy.fowkes@psychboard.az.gov>

Dear Dr. Gandolfo,

At its meeting on November 1, 2019, the Arizona Board of Psychologist Examiners considered your application for licensure by universal recognition. The Board reviewed your application and voted to deny it based upon the fact that you did not obtain your doctoral degree from a regionally accredited educational institution and you have resided in Arizona for approximately 12 years. It is the Board's position that the newly enacted portion of A.R.S. 32-4302(A) relating to universal recognition is intended to apply to those applicants who have recently established a residence in Arizona, not someone who is a long term resident who would otherwise not qualify.

However, the Board also voted to provide you with the opportunity to withdraw your application from consideration. Please notify the Board office on or before 5:00 p.m. on November 14, 2019 of your decision whether to withdraw your application. If you do not withdraw your application or if the Board office does not hear from you before the time and date specified, you will receive a Notice of Denial thereafter. Please know that this letter **does not** serve as your Notice of Denial. You will receive a Notice of Denial only if your application is not withdrawn or we do not hear from you as indicated.

We look forward to hearing from you.

Sincerely,

Jennifer Michaelsen

Interim Executive Director

Fax: 602-542-8279

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Sincerely,

Jennifer Michaelsen

Interim Executive Director

Fax: 602-542-8279

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From: [Emily Rajakovich](#) on behalf of [Emily Rajakovich <erajakovich@az.gov>](#)
To: [Jennifer Michaelsen](#)
Subject: Re: Gandolfo correspondence
Date: Thursday, November 7, 2019 2:34:04 PM

Thank you, Jennifer. I really appreciate it. As we work through this, I think it's only fair that we offer the applicant some flexibility on the November 14 deadline since it seems there could be some ramifications if she does not respond. Would you be able to communicate with her on that point?

Emily

On Thu, Nov 7, 2019 at 1:58 PM Jennifer Michaelsen

<jennifer.michaelsen@psychboard.az.gov> wrote:

Hi Emily,

Thank you for your email. I'm glad that you were able to speak with Dr. Bohanske regarding this matter.

In regards to Dr. Gandolfo's case, the Board reviewed her application at its meeting on 11/1/2019. I subsequently sent Dr. Gandolfo an email on the same date explaining the Board's decision and her options. Please note that I did not send Dr. Gandolfo a letter, just the email. My email to Dr. Gandolfo is attached. If Dr. Gandolfo determines that she does not want to withdraw her application, which is at her discretion, a Notice of Denial will then be mailed to her. The Notice would include the appeal information.

The Board has not denied any other universal recognition applications. There are 2 universal applications that the Board recently reviewed where additional information was requested from both applicants. Staff is waiting for these applicants to submit the requested information. However, I do not know if these applications will ultimately be approved or denied by the Board.

If you need any additional information, please let me know.

Sincerely,

Jennifer Michaelsen

Interim Executive Director

Fax: 602-542-8279

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Let me know what questions you may have. Happy to discuss further and appreciate the time on it.

Many thanks,
Emily

--

Emily Rajakovich | **Office of Arizona Governor Doug Ducey**
Director, Boards and Commissions

www.azgovernor.gov

--

Emily Rajakovich | **Office of Arizona Governor Doug Ducey**
Director, Boards and Commissions

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From: [Jennifer Michaelsen](#) on behalf of [Jennifer Michaelsen <jennifer.michaelsen@psychboard.az.gov>](#)
To: [Emily Rajakovich](#)
Subject: Re: Gandolfo correspondence
Date: Friday, November 8, 2019 8:29:54 AM

Good morning Emily,

Yes, I can certainly give Dr. Gandolfo additional time to respond regarding her decision to withdraw/not withdraw. I am going to send her an email shortly that she has until 5 p.m. on Monday, November 25th, which gives Dr. Gandolfo an additional 11 days to consider.

Sincerely,

Jennifer Michaelsen

Interim Executive Director

Fax: 602-542-8279

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Emily

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send Dr. Gandolfo a letter, just the email. My email to Dr. Gandolfo is attached. If Dr. Gandolfo determines that she does not want to withdraw her application, which is at her discretion, a Notice of Denial will then be mailed to her. The Notice would include the appeal information.

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If you need any additional information, please let me know.

Sincerely,

Jennifer Michaelsen

Interim Executive Director

Fax: 602-542-8279

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Many thanks,
Emily

--

Emily Rajakovich | **Office of Arizona Governor Doug Ducey**
Director, Boards and Commissions

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--

Emily Rajakovich | **Office of Arizona Governor Doug Ducey**
Director, Boards and Commissions

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From: [Tobi Zavala](#) on behalf of [Tobi Zavala <tobi.zavala@azbbhe.us>](#)
To: [Trista Guzman Glover](#)
Subject: Re: Request for approval of rule making
Date: Thursday, February 27, 2020 3:12:33 PM
Attachments: [AZBBHE Proposed rules 2019.pdf](#)
[AZBBHE Rulemaking request.pdf](#)

Please see the attached proposed rules and ease of burden justification.

Tobi Zavala, Executive Director



ARIZONA BOARD OF BEHAVIORAL HEALTH EXAMINERS
1740 W. Adams Street, Suite 3600, Phoenix, AZ 85007
Phone: [602-364-0890](#) Fax: [602-364-0890](#)
Email: tobi.zavala@azbbhe.us
Board Website: www.azbbhe.us

THE BOARD IS GOING GREEN! Beginning October 1, 2018, renewal notifications will be sent via email rather than through USPS. Please ensure you have a current email on file to avoid missing important information.

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On Tue, Feb 25, 2020 at 8:11 AM Trista Guzman Glover <tguzman@az.gov> wrote:

Good Morning, Tobi -

Thanks for sending this over. Please let GRRC know that your rulemaking request is under review with our office.

When you can, please provide a summarized list identifying how each rule listed in your request eases burdens. If you have further questions, I'm happy to discuss.

Best,
Trista

On Mon, Feb 24, 2020 at 6:59 AM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:

Good morning,

I was following up on this submittal. We are scheduled for GRRC tomorrow and I suspect they will inquire about this.

Tobi Zavala, Executive Director



ARIZONA BOARD OF BEHAVIORAL HEALTH EXAMINERS
[1740 W. Adams Street, Suite 3600, Phoenix, AZ 85007](https://www.azbbhe.us)
Phone: 602-542-1617 Fax: 602-364-0890
Email: tobi.zavala@azbbhe.us
Board Website: www.azbbhe.us

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On Tue, Feb 18, 2020 at 12:21 PM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:
Please see attached.

Tobi Zavala, Executive Director



ARIZONA BOARD OF BEHAVIORAL HEALTH EXAMINERS
[1740 W. Adams Street, Suite 3600, Phoenix, AZ 85007](https://www.azbbhe.us)
Phone: 602-542-1617 Fax: 602-364-0890
Email: tobi.zavala@azbbhe.us
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--
Trista Guzman Glover | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions

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R4-6-101. Definitions

A. The definitions at A.R.S. § 32-3251 apply to this Chapter. Additionally, the following definitions apply to this Chapter, unless otherwise specified:

~~32. “Independent contractor” means a licensed behavioral health professional whose contract to provide services on behalf of a behavioral health entity qualifies for independent contractor status under the codes, rules, and regulations of the Internal Revenue Service of the United States.~~

49. “Regionally accredited college or university” means ~~approved~~ the institution has been approved by an entity recognized by the ~~Council for Higher Education Accreditation~~ as a regional accrediting organization.

- ~~a. New England Association of Schools and Colleges,~~
- ~~b. Middle States Commission on Higher Education,~~
- ~~c. North Central Association,~~
- ~~d. Northwest Commission on Colleges and Universities,~~
- ~~e. Southern Association of Colleges and Schools, or~~
- ~~f. Western Association of Schools and Colleges.~~

R4-6-211. Direct Supervision: Supervised Work Experience: General

A. A licensee subject to practice limitations pursuant to R4-6-210 shall practice in an entity with responsibility and clinical oversight of the behavioral health services provided by the licensee.

B. A masters level licensee working under direct supervision who operates or manages their own entity with immediate responsibility for the behavioral health services provided by the licensee shall provide the following to the board for approval prior to providing behavioral health services:

1. The name of their clinical supervisor who meets the following:
 - a. Is independently licensed by the board in the same discipline as the supervisee, and who has practiced as an independently licensed behavioral health professional for a minimum of two years beyond the supervisor’s licensure date;
 - b. Is in compliance with the clinical supervisor educational requirements specified in R4-6-214;
 - c. Is not prohibited from providing clinical supervision by a board consent agreement; and
2. A copy of the agreement between the clinical supervisor and supervisee demonstrating:
 - a. The supervisee and supervisor will meet individually for one hour for every 20 hours of direct client contact provided, to include an onsite meeting every 60 days;
 - b. Supervisee’s clients will be notified of clinical supervisor’s involvement in their treatment and the means to contact the supervisor;

- c. Supervision reports will be submitted to the board every six months;
- d. A 30 day notice is required prior to either party terminating the agreement;
- e. The supervisor and supervisee will notify the board within 10 days of the agreement termination date; and
- f. The supervisee will cease practicing within 60 days of the agreement termination date until such time as a subsequent agreement is provided to the board and approved.

C. A licensee complying with subsection B shall not provide clinical oversight and responsibility for the behavioral health services of another licensee subject to the practice limitations pursuant to R4-6-210.

~~C~~D. To meet the supervised work experience requirements for licensure, direct supervision shall:

- 1. Meet the specific supervised work experience requirements contained in Articles 4,5,6, and 7;
- 2. Be acquired after completing the degree required for licensure and receiving certification or licensure from a state regulatory entity;
- 3. Be acquired before January 1, 2006, if acquired as an unlicensed professional practicing under an exemption provided in A.R.S. § 32-3271;
- 4. Involve the practice of behavioral health; and
- 5. Be for a term of no fewer than 24 months.

~~D~~E. An applicant who acquired supervised work experience outside of Arizona may submit that experience for approval as it relates to the qualifications of the supervisor and the entity in which the supervision was acquired. The board may accept the supervised work experience as it relates to the supervisor and the entity if it met the requirements of the state in which the supervised work experience occurred. Nothing in this provision shall apply to the supervision requirements set forth in R4-6-403, R4-6-503, R4-6-603 and R4-6-705.

~~E~~F. If the Board determines that an applicant engaged in unprofessional conduct related to services rendered while acquiring hours under supervised work experience, including clinical supervision, the Board shall not accept the hours to satisfy the requirements of R4-6-403, R4-6-503, R4-6-603, or R4-6-706. Hours accrued before and after the time during which the conduct that was the subject of the finding of unprofessional conduct occurred, as determined by the Board, may be used to satisfy the requirements of R4-6-403, R4-6-503, R4-6-603, or R4-6-706 so long as the hours are not the subject of an additional finding of unprofessional conduct.

R4-6-212. Clinical Supervision Requirements

A. The Board shall accept hours of clinical supervision submitted by an applicant if the clinical supervision meets the requirements specified in R4-6-404, R4-6-504, R4-6-604, or R4-6-706, as applicable to the license for which application is made, and was provided by one of the following:

1. A clinical social worker, professional counselor, independent marriage and family therapist, or independent substance abuse counselor who:
 - a. Holds an active and unrestricted license issued by the Board, and
 - b. Has complied with the educational requirements specified in R4-6-214;
 2. A mental health professional who holds an active and unrestricted license issued under A.R.S. Title 32, Chapter 19.1 as a psychologist and has complied with the educational requirements specified in R4-6-214; or
 3. An individual who:
 - a. Holds an active and unrestricted license to practice behavioral health,
 - b. Is providing behavioral health services in Arizona:
 - i. Under a contract or grant with the federal government under the authority of 25 U.S.C. § ~~450-450(n)~~5301 or § 1601-1683, or
 - ii. By appointment under 38 U.S.C. § 7402 (8-11), and
 - c. Has complied with the educational requirements specified in R4-6-214.
- B.** Unless an exemption was obtained under R4-6-212.01, the Board shall accept hours of clinical supervision submitted by an applicant if the clinical supervision was provided by an individual who:
1. Was qualified under subsection (A), and
 2. Was employed by the behavioral health entity at which the applicant obtained hours of clinical supervision.
- C.** The Board shall accept hours of clinical supervision submitted by an applicant if the clinical supervision includes all of the following:
1. Reviewing ethical and legal requirements applicable to the supervisee's practice, including unprofessional conduct as defined in A.R.S. § 32-3251;
 2. Monitoring the supervisee's activities to verify the supervisee is providing services safely and competently;
 3. Verifying in writing that the supervisee provides clients with appropriate written notice of clinical supervision, including the means to obtain the name and telephone number of the supervisee's clinical supervisor;
 4. Contemporaneously written documentation by the clinical supervisor of at least the following for each clinical supervision session at each entity:
 - a. Date and duration of the clinical supervision session;
 - b. A detailed Ddescription of topics discussed and instruction provided. ~~Identifying information regarding clients is not required;~~

- c. Beginning on July 1, 2006, name and signature of the individual receiving clinical supervision;
 - d. Name and signature of the clinical supervisor and the date signed; and
 - e. Whether the clinical supervision occurred on a group or individual basis;
5. Maintaining the documentation of clinical supervision required under subsection (C)(4) for at least seven years;
 6. Verifying that clinical supervision was not acquired from a family member as prescribed in R4-6-101(A)(29);
 7. Conducting on-going compliance review of the supervisee's clinical documentation to ensure the supervisee maintains adequate written documentation;
 8. Providing instruction regarding:
 - a. Assessment,
 - b. Diagnosis,
 - c. Treatment plan development, and
 - d. Treatment;
 9. Rating the supervisee's overall performance as at least satisfactory, using a form approved by the Board; and
 10. Complying with the discipline-specific requirements in Articles 4 through 7 regarding clinical supervision.
- D.** The Board shall accept hours of clinical supervision submitted by an applicant for licensure if:
1. At least two hours of the clinical supervision were provided in a face-to-face setting during each six-month period;
 2. No more than 90 hours of the clinical supervision were provided by videoconference and telephone.
 3. No more than 15 of the 90 hours of clinical supervision provided by videoconference and telephone were provided by telephone; and
 4. Each clinical supervision session was at least 30 minutes long.
- E.** Effective July 1, 2006, the Board shall accept hours of clinical supervision submitted by an applicant if at least 10 of the hours involve the clinical supervisor observing the supervisee providing treatment and evaluation services to a client. The clinical supervisor may conduct the observation:
1. In a face-to-face setting,
 2. By videoconference,
 3. By teleconference, or
 4. By review of audio or video recordings.

- F. The Board shall accept hours of clinical supervision submitted by an applicant from a maximum of six clinical supervisors.
- G. The Board shall accept hours of clinical supervision obtained by an applicant in both individual and group sessions, subject to the following restrictions:
 - 1. At least 25 of the clinical supervision hours involve individual supervision, and
 - 2. Of the minimum 100 hours of clinical supervision required for licensure, the Board may accept:
 - a. Up to 75 of the clinical supervision hours involving a group of two supervisees; and
 - b. Up to 50 of the clinical supervision hours involving a group of three to six supervisees.
- H. If an applicant provides evidence that a catastrophic event prohibits the applicant from obtaining documentation of clinical supervision that meets the standard specified in subsection (C), the Board may consider alternate documentation.

R4-6-212.01. Exemptions to the Clinical Supervision Requirements

The Board shall accept hours of clinical supervision submitted by an applicant if the clinical supervision meets the requirements specified in R4-6-212 and R4-6-404, R4-6-504, R4-6-604, or R4-6-706, as applicable to the license for which application is made, unless an exemption is granted as follows:

- 1. An individual using supervised work experience acquired in Arizona may apply to the Board for an exemption from the following requirements:
 - a. Qualifications of the clinical supervisor. The Board may grant an exemption to the supervisor qualification requirements in R4-6-212(A) and R4-6-404, R4-6-504, R4-6-604, or R4-6-706, as applicable to the license for which application is made, if the Board determines the behavioral health professional who provided or will provide the clinical supervision has:
 - i. Education, training, and experience necessary to provide clinical supervision
 - ii. Complied with the educational requirements specified in R4-6-214, and:
 - iii.
 - ~~i. A qualified supervisor is not available because of the size and geographic location of the professional setting in which the clinical supervision will occur; or~~
 - ~~ii. The behavioral health professional who provided or will provide the clinical supervision~~ holds an active and unrestricted license issued under A.R.S. Title 32 as a physician under Chapter 13 or 17 with certification in psychiatry or addiction medicine or as a nurse practitioner under Chapter 15 with certification in mental health;
 - b. Employment of clinical supervisor. The Board may grant an exemption to the requirement in R4-6-212(B) regarding employment of the supervisor by the behavioral health entity at which

- the supervisee obtains hours of clinical supervision if the supervisee provides verification that:
- i. The supervisor and behavioral health entity have a written contract providing the supervisor the same access to the supervisee's clinical records provided to employees of the behavioral health entity, that is signed and dated by both parties, and
 - ii. Supervisee's clients authorized the release of their clinical records to the supervisor; and
- c. Discipline-specific changes. The Board may grant an exemption to a requirement in R4-6-404, R4-6-504, R4-6-604, or R4-6-706, as applicable to the license for which application is made, that changed on November 1, 2015, and had the effect of making the clinical supervision previously completed or completed no later than October 31, 2017, non-compliant with the clinical supervision requirements. If the Board grants an exemption under this subsection, the Board shall evaluate the applicant's clinical supervision using the requirements in existence before November 1, 2015.
2. An individual using supervised work experience acquired outside of Arizona may apply to the Board for an exemption from the clinical supervision requirements in R4-6-404, R4-6-504, R4-6-604, or R4-6-706, as applicable to the license for which application is made. The Board may grant an exemption for clinical supervised work experience acquired outside of Arizona if the Board determines that the behavioral health professional providing the supervision met one of the following:
- a. Complied with the educational requirements specified in R4-6-214,
 - b. Complied with the clinical supervisor requirements of the state in which the supervision occurred, or
 - c. Was approved to provide supervision to the applicant by the state in which the supervision occurred.

R4-6-214. Clinical Supervisor Educational Requirements

- A. The Board shall consider hours of clinical supervision submitted by an applicant only if the individual who provides the clinical supervision is qualified under R4-6-212(A) and complies with the following:
1. Completes one of the following:
 - a. At least 12 hours of training that meets the standard specified in R4-6-802(D), addresses clinical supervision, and includes the following:
 - i. Role and responsibilities of a clinical supervisor;

- ii. Skills in providing effective oversight of and guidance to supervisees who diagnose, create treatment plans, and treat clients;
 - iii. Supervisory methods and techniques; and
 - iv. Fair and accurate evaluation of a supervisee's ability to plan and implement clinical assessment and treatment;
- b. An approved clinical supervisor certification from the National Board for Certified Counselors/Center for Credentialing and Education;
 - c. A clinical supervisor certification from the International Certification and Reciprocity Consortium; or
 - d. A clinical member with an approved supervisor designation from the American Association of Marriage and Family Therapy; and
2. Beginning January 1, 2018, completes ~~at the~~ three clock hour ~~Board approved tutorial on Board statutes and rules~~ Clinical Supervision Tutorial on Arizona Statutes/Regulations.
- ~~B. Through December 31, 2017, the Board shall consider hours of clinical supervision submitted by an applicant if the individual who provided the clinical supervision was licensed at an independent level, qualified under R4-6-212(A), and the supervision was provided during the first two years the individual was licensed at the independent level.~~
- ~~1. For the Board to continue to accept hours of clinical supervision provided by the individual described under subsection (B), the individual shall have obtained at least 12 hours of training described in subsection (A)(1)(a):~~
 - ~~a. Before the individual's license expired for the first time; or~~
 - ~~b. Before providing supervision if the 12 hours of training described in subsection (A)(1)(a) were obtained after the individual's license expired;~~
 - ~~2. For the Board to continue to accept hours of clinical supervision provided by the individual described under subsection (B)(1), the individual shall have obtained at least six hours of training described in subsection (A)(1)(a) before the individual's license expires again and during each subsequent license period expiring before January 1, 2018;~~
 - ~~3. For the Board to continue to accept hours of clinical supervision provided by the individual described under subsection (B)(2), the individual shall comply fully with subsection (C) before the individual's license expires for the first time on or after January 1, 2018.~~
- ~~C. To continue providing clinical supervision, an individual qualified under subsection (A)(1)(a) shall, at least every three years, complete a minimum of nine hours of continuing training that:~~
1. Meets the standard specified in R4-6-802(D);
 2. Concerns clinical supervision;

3. Addresses the topics listed in subsection (A)(1)(a); and
4. Beginning January 1, 2018, includes ~~three clock hours of a Board approved tutorial on Board statutes and rules~~ the three clock hour Clinical Supervision Tutorial on Arizona Statutes/Regulations.

DC.To continue providing clinical supervision, an individual qualified under subsections (A)(1)(b) through (d) shall:

1. Provide documentation that the national certification or designation was renewed before it expired, and
2. Beginning January 1, 2018, complete ~~at the three clock hour Board approved tutorial on Board statutes and rules~~ Clinical Supervision Tutorial on Arizona Statutes/Regulations.

D. An applicant submitting hours of clinical supervision by an individual qualified by meeting the clinical supervision education requirements in effect before the effective date of this Section shall provide documentation that the clinical supervisor was compliant with the education requirements during the period of supervision.

R4-6-215. Fees and Charges

A. Under the authority provided by A.R.S. § 32-3272, the Board establishes and shall collect the following fees:

1. Application for license by examination: \$250;
2. Application for license by endorsement: \$250;
- ~~3. Issuance of license: \$100;~~
- ~~4~~3. Application for a temporary license: \$50;
- ~~5~~4. Application for approval of educational program: \$500;
- ~~6~~5. Application for approval of an educational program change: \$250
- ~~7~~6. Biennial renewal of first area of licensure: \$325;
- ~~8~~7. Biennial renewal of each additional area of licensure if all licenses are renewed at the same time: \$163;
- ~~9~~8. Late renewal penalty: \$100 in addition to the biennial renewal fee;
- ~~10~~9. Inactive status request: \$100; and
- ~~11~~0. Late inactive status request: \$100 in addition to the inactive status request fee.

B. The Board shall charge the following amounts for the services it provides:

1. Issuing a duplicate license: \$25;
2. Criminal history background check: \$40;
3. Paper copy of records: \$.50 per page after the first four pages;

4. Electronic copy of records: \$25;
 5. Copy of a Board meeting audio recording: \$20;
 6. Verification of licensure: \$20 per discipline or free if downloaded from the Board's web site;
 7. Board's rules and statutes book: \$10 or free if downloaded from the Board's web site;
 8. Mailing list of licensees: \$150, and
 9. Returned check due to insufficient funds: \$50.
- C. The application fees in subsections (A)(1) and (2) are non-refundable. Other fees established in subsection (A) are not refundable unless the provisions of A.R.S. § 41-1077 apply.
- D. The Board shall accept payment of fees and charges as follows:
1. For an amount of \$40 or less, a personal or business check;
 2. For amounts greater than \$40, a certified check, cashier's check, or money order; and
 3. By proof of online payment by credit card for the following:
 - a. All fees in subsection (A);
 - b. The charge in subsection (B)(2) for a criminal history background check; and
 - c. The charge in subsection (B)(8) for a mailing list of licensees.
- ~~E. An applicant shall make payment for a criminal history background check separate from payment for other fees and charges.~~

R4-6-216. Foreign Equivalency Determination

The Board shall accept as qualification for licensure a degree from an institution of higher education in a foreign country if the degree is substantially equivalent to the educational standards required in this Chapter for professional counseling, marriage and family therapy, and substance abuse counseling licensure. To enable the Board to determine whether a foreign degree is substantially equivalent to the educational standards required in this Chapter, the applicant shall, at the applicant's expense, have the foreign degree evaluated by an ~~entity approved by the Board~~ evaluation service that is a member of the National Association of Credentials Evaluation Services, Inc.

- A. Any document that is in a language other than English shall be accompanied by a translation with notarized verification of the translation's accuracy and completeness. This translation shall be completed by an individual, other than the applicant, and demonstrates no conflict of interest. The individual providing the translation may be college or university language faculty, a translation service, or an American consul.

R4-6-304. Application for a License by Endorsement

An applicant who meets the requirements specified under A.R.S. § 32-3274 for a license by endorsement shall submit a completed application packet, as prescribed in R4-6-301, and the following:

1. The name of one or more other jurisdictions where the applicant is certified or licensed as a behavioral health professional by a state or federal regulatory entity, and has been for at least three years;
2. A verification of each certificate or license identified in subsection (1) by the state regulatory entity issuing the certificate or license that includes the following:
 - a. The certificate or license number issued to the applicant by the state regulatory entity;
 - b. The issue and expiration date of the certificate or license;
 - c. Whether the applicant has been the subject of disciplinary proceedings by a state regulatory entity ~~including whether there are any unresolved complaints pending against the applicant;~~ and
 - d. Whether the certificate or license is active and in good standing;
3. If applying at a practice level listed in A.R.S. § 32-3274(B), include:
 - a. An official transcript as prescribed in R4-6-301(6); and
 - b. If applicable, a foreign degree evaluation prescribed in R4-6-216 or R4-6-401; and
4. Documentation of completion of the ~~Board approved tutorial on Board statutes and rules~~ Arizona Statutes/Regulations Tutorial.

R4-6-402. Examination

- A.** To be licensed as a baccalaureate social worker, an applicant shall receive a passing score on the bachelors, masters, advanced generalist, or clinical examination offered by ASWB.
- B.** To be licensed as a master social worker, an applicant shall receive a passing score on the masters, advanced generalist, or clinical examination offered by ASWB.
- C.** ~~Except as specified in subsection (G)(2),~~ To be licensed as a clinical social worker, an applicant shall receive a passing score on the clinical examination offered by ASWB.
- D.** An applicant for baccalaureate, master, or clinical social worker licensure shall receive a passing score on an approved examination for the level of licensure requested within 12 months after receiving written examination authorization from the Board. An applicant shall not take an approved licensure examination more than three times during the 12-month testing period.
- E.** If an applicant does not receive a passing score on an approved licensure examination within the 12 months referenced in subsection (D), the Board shall close the applicant's file with no recourse to

appeal. To receive further consideration for licensure, an applicant whose file is closed shall submit a new application and fee.

F. The Board may grant a one-time 90-day examination extension request to an applicant who demonstrates good cause as specified under R4-6-305(G).

~~**G.** To be licensed by endorsement as a clinical social worker, an applicant shall receive a passing score on:~~

~~— 1. The clinical examination offered by ASWB; or~~

~~— 2. The advanced generalist examination offered by ASWB if the applicant:~~

~~—— a. Was licensed as a clinical social worker before July 1, 2004;~~

~~—— b. Met the examination requirement of the state being used to qualify for licensure by endorsement; and~~

~~—— c. Has been licensed continuously at the same level since passing the examination.~~

R4-6-501. Curriculum

A. An applicant for licensure as an associate or professional counselor shall have a master's or higher degree with a major emphasis in counseling from:

1. A program accredited by CACREP or CORE that consists of at least 60 semester or 90 quarter credit hours, including a supervised counseling practicum as prescribed under subsection (E);

2. An educational program previously approved by the Board under A.R.S. § 32-3253(A)(14) that consists of at least 60 semester or 90 quarter credit hours, including a supervised counseling practicum as prescribed under subsection (E); or

3. A program from a regionally accredited college or university that consists of at least 60 semester or 90 quarter credit hours, meets the requirements specified in subsections (C) and (D), and includes a supervised counseling practicum as prescribed under subsection (E).

B. To assist the Board to evaluate a program under subsection (A)(3), an applicant who obtained a degree from a program under subsection (A)(3) shall attach the following to the application required under R4-6-301:

1. Published college or university course descriptions for the year and semester enrolled for each course submitted to meet curriculum requirements,

2. Verification, using a form approved by the Board, of completing the supervised counseling practicum required under subsection (E); and

3. Other documentation requested by the Board.

- C. The Board shall accept for licensure the curriculum from a program not accredited by CACREP or CORE if the curriculum includes at least 60 semester or 90 quarter credit hours in counseling-related coursework, of which at least three semester or 4 quarter credit hours are in each of the following eight core content areas:
1. Professional orientation and ethical practice: Studies that provide a broad understanding of professional counseling ethics and legal standards, including but not limited to:
 - a. Professional roles, functions, and relationships;
 - b. Professional credentialing;
 - c. Ethical standards of professional organizations; and
 - d. Application of ethical and legal considerations in counseling;
 2. Social and cultural diversity: Studies that provide a broad understanding of the cultural context of relationships, issues, and trends in a multicultural society, including but not limited to:
 - a. Theories of multicultural counseling, and
 - b. Multicultural competencies and strategies;
 3. Human growth and development: Studies that provide a broad understanding of the nature and needs of individuals at all developmental stages, including but not limited to:
 - a. Theories of individual and family development across the life-span, and
 - b. Theories of personality development;
 4. Career development: Studies that provide a broad understanding of career development and related life factors, including but not limited to:
 - a. Career development theories, and
 - b. Career decision processes;
 5. Helping relationship: Studies that provide a broad understanding of counseling processes, including but not limited to:
 - a. Counseling theories and models,
 - b. Essential interviewing and counseling skills, and
 - c. Therapeutic processes;
 6. Group work: Studies that provide a broad understanding of group development, dynamics, counseling theories, counseling methods and skills, and other group work approaches, including but not limited to:
 - a. Principles of group dynamics,
 - b. Group leadership styles and approaches, and
 - c. Theories and methods of group counseling;

7. Assessment: Studies that provide a broad understanding of individual and group approaches to assessment and evaluation, including but not limited to:
 - a. Diagnostic process including differential diagnosis and use of diagnostic classification systems such as the Diagnostic and Statistical Manual of Mental Disorders and the International Classification of Diseases,
 - b. Use of assessment for diagnostic and intervention planning purposes, and
 - c. Basic concepts of standardized and non-standardized testing; and
 8. Research and program evaluation: Studies that provide a broad understanding of recognized research methods and design and basic statistical analysis, including but not limited to:
 - a. Qualitative and quantitative research methods, and
 - b. Statistical methods used in conducting research and program evaluation.
- D.** In evaluating the curriculum required under subsection (C), the Board shall assess whether a core content area is embedded or contained in more than one course. The applicant shall provide information the Board requires to determine whether a core content area is embedded in multiple courses. The Board shall not accept a core content area embedded in more than two courses unless the courses are succession courses. The Board shall allow subject matter in a course to qualify in only one core content area.
- E.** The Board shall accept a supervised counseling practicum that is part of a master's or higher degree program if the supervised counseling practicum meets the following standards:
1. Consists of at least 700 clock hours in a professional counseling setting,
 2. Includes at least 240 hours of direct client contact,
 3. Provides an opportunity for the supervisee to perform all activities associated with employment as a professional counselor,
 4. Oversight of the counseling practicum is provided by a faculty member, and
 5. Onsite supervision is provided by an individual approved by the college or university.
- F.** The Board shall require that an applicant for professional counselor licensure who received a master's or higher degree before July 1, 1989, from a program that did not include a supervised counseling practicum complete three years of post-master's or higher degree work experience in counseling under direct supervision. One year of a doctoral-clinical internship may be substituted for one year of supervised work experience.
- G.** The Board shall accept for licensure only courses that the applicant completed with a passing grade.
- H.** The Board shall deem ~~that an applicant who holds an active associate counselor license issued by the Board and in good standing~~ to meets the curriculum requirements for professional counselor licensure if the applicant:-

1. 1. Holds an active and in good standing associate counselor license issued by the Board; and
2. 2. Met the curriculum requirements with a master's degree in a behavioral health field from a regionally accredited university when the associate counselor license was issued.

R4-6-502. Examination

- A. The Board approves the following examinations for applicants for counselor licensure:
1. National Counselor Examination for Licensure and Certification offered by the National Board for Certified Counselors,
 2. National Clinical Mental Health Counseling Examination offered by the National Board for Certified Counselors, and
 3. Certified Rehabilitation Counselor Examination offered by the Commission on Rehabilitation Counselor Certification.
- B. An applicant for counselor licensure shall receive a passing score on an approved licensure examination.
- C. An applicant shall pass an approved examination within 12 months after receiving written examination authorization from the Board. An applicant shall not take an examination more than three times during the 12-month testing period.
- D. If an applicant does not receive a passing score as required under subsection (B) within the 12 months referenced in subsection (C), the Board shall close the applicant's file with no recourse to appeal. To receive further consideration for licensure, an applicant whose file is closed shall submit a new application and fee.
- E. The Board may grant a one-time 90-day examination extension request to an applicant who demonstrates good cause as specified under R4-6-305(G).
- F. The Board shall deem an applicant for professional counselor licensure to meet the exam requirement if the applicant holds an active and in good standing associate counselor license issued by the Board pursuant to A.R.S. § 32-3274 or A.R.S. § 32-4302.

R4-6-504. Clinical Supervision for Professional Counselor Licensure

- A. An applicant for professional counselor licensure shall demonstrate that the applicant received at least 100 hours of clinical supervision that meet the requirements specified in subsection (B) and R4-6-212 during the supervised work experience required under R4-6-503.
- B. The Board shall accept hours of clinical supervision for professional counselor licensure from the following behavioral health professionals who meet the educational requirements under R4-6-214if:

1. ~~At least 50 hours are supervised by a professional counselor licensed by the Board, and licensed professional counselor;~~
 2. ~~The remaining hours are supervised by an individual qualified under R4-6-212(A), or A licensed clinical social worker;~~
 3. A licensed marriage and family therapist;
 4. A licensed psychologist; or
 5. ~~The hours are supervised by a~~An individual for whom an exemption was obtained under R4-6-212.01.
- C. The Board shall not accept hours of clinical supervision provided by a substance abuse counselor for professional counselor licensure.

R4-6-601. Curriculum

- A. An applicant for licensure as an associate marriage and family therapist or a marriage and family therapist shall have a master's or higher degree from a regionally accredited college or university in a behavioral health science program that :
1. Is accredited by COAMFTE;
 2. Was previously approved by the Board under A.R.S. § 32-3253(A)(14); or
 3. Includes at least three semester or four quarter credit hours in each of the number of courses specified in the six core content areas listed in subsection (B).
- B. A program under subsection (A)(3) shall include:
1. Marriage and family studies: Three courses from a family systems theory orientation that collectively contain at minimum the following elements:
 - a. Introductory family systems theory;
 - b. Family development;
 - c. Family systems, including marital, sibling, and individual subsystems; and
 - d. Gender and cultural issues;
 2. Marriage and family therapy: Three courses that collectively contain at minimum the following elements:
 - a. Advanced family systems theory and interventions;
 - b. Major systemic marriage and family therapy treatment approaches;
 - c. Communications; and
 - d. Sex therapy;
 3. Human development: Three courses that may integrate family systems theory that collectively contain at minimum the following elements:

- a. Normal and abnormal human development;
 - b. Human sexuality; and
 - c. Psychopathology and abnormal behavior;
4. Professional studies: One course including at minimum:
- a. Professional ethics as a therapist, including legal and ethical responsibilities and liabilities;
and
 - b. Family law;
5. Research: One course in research design, methodology, and statistics in behavioral health science; and
6. Supervised practicum: Two courses that supplement the practical experience gained under subsection (D).
- C.** In evaluating the curriculum required under subsection (B), the Board shall assess whether a core content area is embedded or contained in more than one course. The applicant shall provide information the Board requires to determine whether a core content area is embedded in multiple courses. The Board shall not accept a core content area embedded in more than two courses unless the courses are succession courses. The Board shall allow subject matter in a course to qualify in only one core content area.
- D.** A program's supervised practicum shall meet the following standards:
1. Provides an opportunity for the enrolled student to provide marriage and family therapy services to individuals, couples, and families in an educational or professional setting under the direction of a faculty member or supervisor designated by the college or university;
 2. Includes at least 300 client-contact hours provided under direct supervision;
 3. Has supervision provided by a designated licensed marriage and family therapist.
- E.** An applicant may submit a written request to the ARC for an exemption from the requirement specified in subsection (D)(3). The request shall include the name of the behavioral health professional proposed by the applicant to act as supervisor of the practicum, a copy of the proposed supervisor's transcript and curriculum vitae, and any additional documentation requested by the ARC. The ARC shall grant the exemption if the ARC determines the proposed supervisor is qualified by education, experience, and training to provide supervision.
- F.** The Board shall deem an applicant ~~who holds an active associate marriage and family therapist license issued by the Board and in good standing meets~~ to meet the curriculum requirements for marriage and family therapist licensure if the applicant:-
1. Holds an active and in good standing associate marriage and family therapist license issued by the Board; and

2. Met the curriculum requirements with a master's degree in a behavioral health field from a regionally accredited university when the associate marriage and family therapist license was issued.

R4-6-602. Examination

- A. The Board approves the marriage and family therapy licensure examination offered by the Association of Marital and Family Therapy Regulatory Boards.
- B. An applicant for associate marriage and family therapist or marriage and family therapist licensure shall receive a passing score on the approved licensure examination.
- C. An applicant shall pass the approved examination within 12 months after receiving written examination authorization from the Board. An applicant shall not take the examination more than three times during the 12-month testing period.
- D. If an applicant does not receive a passing score as required under subsection (B) within the 12 months referenced in subsection (C), the Board shall close the applicant's file with no recourse to appeal. To receive further consideration for licensure, an applicant whose file is closed shall submit a new application and fee.
- E. The Board may grant a one-time 90-day examination extension request to an applicant who demonstrates good cause as specified under R4-6-305(G).
- F. The Board shall deem an applicant for marriage and family therapist licensure to meet the exam requirement if the applicant holds an active and in good standing associate marriage and family therapist license issued by the Board pursuant to A.R.S. § 32-3274 or A.R.S. § 32-4302.

R4-6-604. Clinical Supervision for Marriage and Family Therapy Licensure

- A. An applicant for marriage and family therapy licensure shall demonstrate that the applicant received at least 100 hours of clinical supervision that meets the requirements specified in subsection (B) and R4-6-212 during the supervised work experience required under R4-6-603.
- B. The Board shall accept hours of clinical supervision for marriage and family therapist licensure if:
 - 1. The hours are supervised by an individual who meets the educational requirements under R4-6-214;
 - 2. At least ~~75~~50 of the hours are supervised by:
 - a. ~~A~~ marriage and family therapist licensed by the Board; or
 - b. An independently licensed behavioral health professional who holds an Approved Supervisor designation from the American Association for Marriage and Family Therapy; and
 - 3. The remaining hours are supervised by one or more of the following:

- a. A professional counselor licensed by the Board;
 - b. A clinical social worker licensed by the Board;
 - c. A marriage and family therapist licensed by the Board; or
 - d. A psychologist licensed under A.R.S. Title 32, Chapter 19.1; or
4. The hours are supervised by an individual for whom an exemption is obtained under R4-6-212.01.
- C. The Board shall not accept hours of clinical supervision provided by a substance abuse counselor for marriage and family therapy licensure.

R4-6-701. Licensed Substance Abuse Technician Curriculum

- A. An applicant for licensure as a substance abuse technician shall have:
- 1. An associate's or bachelor's degree from a regionally accredited college or university in a program accredited by NASAC;
 - 2. An associate's or bachelor's degree from a regionally accredited college or university in an educational program previously approved by the Board under A.R.S. § 32-3253(A)(14); or
 - 3. An associate's or bachelor's degree from a regionally accredited college or university in a behavioral health science program that includes coursework from the seven core content areas listed in subsection (B).
- B. An associate's or bachelor's degree under subsection (A)(3), shall include at least three semester or four quarter credit hours in each of the following core content areas:
- 1. Psychopharmacology, including but not limited to:
 - ~~a. Nature of psychoactive chemicals;~~
 - ~~b. Behavioral, psychological, physiological, and social effects of psychoactive substance use;~~
 - ~~c. Symptoms of intoxication, withdrawal, and toxicity;~~
 - ~~d. Toxicity screen options, limitations, and legal implications; and~~
 - ~~e. Use of pharmacotherapy for treatment of addiction~~effects on mood, behavior, cognition and physiology;
 - 2. Models of treatment and relapse prevention: Including but not limited to philosophies and practices of generally accepted and scientifically evidence-supported models of:
 - ~~a. Treatment,~~
 - ~~b. Recovery,~~
 - ~~c. Relapse prevention, and~~
 - ~~d. Continuing care for addiction and other substance use related problems;~~

3. Group work: Group dynamics and processes as they relate to addictions and substance use disorders;
 4. Working with diverse populations: Issues and trends in a multicultural and diverse society as they relate to substance use disorder and addiction;
 5. Co-occurring disorders; ~~including but not limited to philosophies and practices of generally accepted and evidence-supported models~~
 - ~~a. Symptoms of mental health and other disorders prevalent in individuals with substance use disorders or addictions;~~
 - ~~b. Screening and assessment tools used to detect and evaluate the presence and severity of co-occurring disorders; and~~
 - ~~c. Evidence based strategies for managing risks associated with treating individuals who have co-occurring disorders;~~
 6. Ethics, including but not limited to:
 - a. Legal and ethical responsibilities and liabilities;
 - b. Standards of professional behavior and scope of practice;
 - c. Client rights, responsibilities, and informed consent; and
 - d. Confidentiality and other legal considerations in the practice of behavioral health; and
 7. Assessment, diagnosis, and treatment. Use of assessment and diagnosis to develop appropriate treatment interventions for substance use disorders or addictions.
- C.** The Board shall waive the education requirement in subsection (A) for an applicant requesting licensure as a substance abuse technician if the applicant demonstrates all of the following:
1. The applicant provides services under a contract or grant with the federal government under the authority of 25 U.S.C. § ~~450—450(n)5301~~ or § 1601 – 1683;
 2. The applicant has obtained at least the equivalent of a high school diploma;
 3. Because of cultural considerations, obtaining the degree required under subsection (A) would be an extreme hardship for the applicant; and
 4. The applicant has completed at least 6400 hours of supervised work experience in substance abuse counseling, as prescribed in R4-6-705(C), in no less than 48 months within the seven years immediately preceding the date of application.
- D.** In evaluating the curriculum required under subsection (B), the Board shall assess whether a core content area is embedded or contained in more than one course. The applicant shall provide information the Board requires to determine whether a core content area is embedded in multiple courses. The Board shall not accept a core content area embedded in more than two courses unless the

courses are succession courses. The Board shall allow subject matter in a course to qualify in only one core content area.

- E. An applicant for licensure as a substance abuse technician who completed the applicant's educational training before the effective date of this Section or no later than October 31, 2017, may request that the Board evaluate the applicant's educational training using the standards in effect before the effective date of this Section.

R4-6-704. Examination

- A. The Board approves the following licensure examinations for an applicant for substance abuse technician licensure:
 - 1. Alcohol and Drug Counselor and Advanced Alcohol and Drug Counselor Examinations offered by the International Certification and Reciprocity Consortium, and
 - 2. Level I or higher examinations offered by the NAADAC, the Association of Addiction Professionals.
- B. The Board approves the following licensure examinations for an applicant for associate or independent substance abuse counselor licensure:
 - 1. Advanced Alcohol and Drug Counselor Examination offered by the International Certification and Reciprocity Consortium,
 - 2. Level II or higher examinations offered by the NAADAC, the Association of Addiction Professionals, and
 - 3. Examination for Master Addictions Counselors offered by the National Board for Certified Counselors.
- ~~C. For an applicant for associate or independent substance abuse counselor licensure who received written examination authorization from the Board before the effective date of this Section, the Board shall accept an examination listed in subsection (A) through expiration of the written examination authorization provided by the Board.~~
- DC.** The Board shall deem an applicant for independent substance abuse counselor licensure as meeting the examination requirements if all of the following apply:
 - 1. The applicant has an active associate substance abuse counselor license;
 - 2. The applicant passed a written examination listed in subsection (A) before November 1, 2015; and
 - 3. The applicant submitted an application to the Board on or after November 1, 2015.

ED. An applicant shall pass an approved examination within 12 months after receiving written examination authorization from the Board. An applicant shall not take an approved examination more than three times during the 12-month testing period.

FE. If an applicant does not receive a passing score on an approved licensure examination within the 12 months referenced in subsection (D), the Board shall close the applicant's file with no recourse to appeal. To receive further consideration for licensure, an applicant whose file is closed shall submit a new application and fee.

GF. The Board may grant a one-time 90-day examination extension request to an applicant who demonstrates good cause as specified under R4-6-305(G).

R4-6-706. Clinical Supervision for Substance Abuse Counselor Licensure

A. During the supervised work experience required under R4-6-705, an applicant for substance abuse counselor licensure shall demonstrate that the applicant received, for the level of licensure sought, at least the number of hours of clinical supervision specified in R4-6-705 that meets the requirements in subsection (B) and R4-6-212.

B. The Board shall accept hours of clinical supervision for substance abuse licensure if the focus of the supervised hours relates to substance use disorder and addiction and:

1. At least 50 hours are supervised by:
 - a. An independent substance abuse counselor licensed by the Board; or
 - b. An independently licensed behavioral health professional who:
 - i. Provides evidence of knowledge and experience in substance use disorder treatment; and
 - ii. Is approved by the ARC or designee, and
2. The remaining hours are supervised by an individual qualified under R4-6-212(A), or
3. The hours are supervised by an individual for whom an exemption was obtained under R4-6-212.01.

R4-6-802. Continuing Education

A. A licensee who maintains more than one license may apply the same continuing education hours for renewal of each license if the content of the continuing education relates to the scope of practice of each license.

B. For each license period, a licensee may report a maximum of:

1. Ten clock hours of continuing education for first-time presentations by the licensee that deal with current developments, skills, procedures, or treatments related to the practice of behavioral health.

The licensee may claim one clock hour for each hour spent preparing, writing, and presenting information;

2. Six clock hours of continuing education for attendance at a Board meeting where the licensee is not:
 - a. A member of the Board,
 - b. The subject of any matter on the agenda, or
 - c. The complainant in any matter that is on the agenda; and
3. Ten clock hours of continuing education for service as a Board or ARC member.

C. For each license period, a licensee shall report:

1. A minimum of three clock hours of continuing education sponsored, approved, or offered by an entity listed in subsection (D) in:
 - a. Behavioral health ethics or mental health law, and
 - b. Cultural competency and diversity; and
2. Beginning January 1, 2018, in addition to the requirement under subsection (C)(1), complete ~~at the~~ three clock hour Board-approved tutorial on Board statutes and rules Arizona Statutes/Regulations Tutorial.

D. A licensee shall participate in continuing education that relates to the scope of practice of the license held and to maintaining or improving the skill and competency of the licensee. The Board has determined that in addition to the continuing education listed in subsections (B) and (C), the following continuing education meets this standard:

1. Activities sponsored or approved by national, regional, or state professional associations or organizations in the specialties of marriage and family therapy, professional counseling, social work, substance abuse counseling, or in the allied professions of psychiatry, psychiatric nursing, psychology, or pastoral counseling;
2. Programs in behavioral health sponsored or approved by a regionally accredited college or university;
3. In-service training, courses, or workshops in behavioral health sponsored by federal, state, or local social service agencies, public school systems, or licensed health facilities or hospitals;
4. Graduate or undergraduate courses in behavioral health offered by a regionally accredited college or university. One semester-credit hour or the hour equivalent of one semester hour equals 15 clock hours of continuing education;
5. Publishing a paper, report, or book that deals with current developments, skills, procedures, or treatments related to the practice of behavioral health. For the license period in which publication

occurs, the licensee may claim one clock hour for each hour spent preparing and writing materials; and

6. Programs in behavioral health sponsored by a state superior court, adult probation department, or juvenile probation department.

E. The Board has determined that a substance abuse technician, associate substance abuse counselor, or an independent substance abuse counselor shall ensure that at least 20 of the 30 clock hours of continuing education required under R4-6-801(B) are in the following categories:

1. Pharmacology and psychopharmacology,
2. Addiction processes,
3. Models of substance use disorder and addiction treatment,
4. Relapse prevention,
5. Interdisciplinary approaches and teams in substance use disorder and addiction treatment,
6. Substance use disorder and addiction assessment and diagnostic criteria,
7. Appropriate use of substance use disorder and addiction treatment modalities,
8. Substance use disorder and addiction as it related to diverse populations,
9. Substance use disorder and addiction treatment and prevention,
10. Clinical application of current substance use disorder and addiction research, or
11. Co-occurring disorders.

R4-6-1101. Consent for Treatment

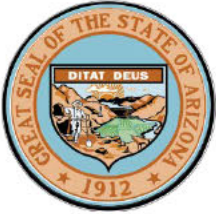
A licensee shall:

1. Provide treatment to a client only in the context of a professional relationship based on informed consent for treatment;
2. Document in writing for each client the following elements of informed consent for treatment:
 - a. Purpose of treatment;
 - b. General procedures to be used in treatment, including benefits, limitations, and potential risks;
 - c. The client's right to have the client's records and all information regarding the client kept confidential and an explanation of the limitations on confidentiality;
 - d. Notification of the licensee's supervision or involvement with a treatment team of professionals;
 - e. Methods for the client to obtain information about the client's records;
 - f. The client's right to participate in treatment decisions and in the development and periodic review and revision of the client's treatment plan;

- g. The client's right to refuse any recommended treatment or to withdraw consent to treatment and to be advised of the consequences of refusal or withdrawal; and
 - h. The client's right to be informed of all fees that the client is required to pay and the licensee's refund and collection policies and procedures; and
3. Obtain a dated and signed informed consent for treatment from a client or the client's legal representative before providing treatment to the client and when a change occurs in an element listed in subsection (2) that might affect the client's consent for treatment; ~~and~~
 4. Obtain a dated and signed informed consent for treatment from a client or the client's legal representative before audio or video taping the client or permitting a third party to observe treatment provided to the client; and
 5. Include a dated signature from an authorized representative of the behavioral health entity.

R4-6-1106. Telepractice

- A. Except as otherwise provided by statute, an individual who provides counseling, social work, marriage and family therapy, or substance abuse counseling via telepractice to a client located in Arizona shall be licensed by the Board.
- B. Except as otherwise provided by statute, a licensee who provides counseling, social work, marriage and family therapy, or substance abuse counseling via telepractice to a client located outside Arizona shall comply with not only A.R.S. Title 32, Chapter 33, and this Chapter but also the laws and rules of the jurisdiction in which the client is located.
- C. An individual who provides counseling, social work, marriage and family therapy, or substance abuse counseling via telepractice shall:
 1. In addition to complying with the requirements in R4-6-1101, document the limitations and risks associated with telepractice, including but not limited to the following:
 - a. Inherent confidentiality risks of electronic communication,
 - b. Potential for technology failure,
 - c. Emergency procedures when the licensee is unavailable, and
 - d. Manner of identifying the client when using electronic communication that does not involve video;
 2. In addition to complying with the requirements in R4-6-1103, include the following in the progress note required under R4-6-1103(H):
 - a. Mode of session, whether interactive audio, video, or electronic communication; ~~and~~
 - b. Physical location of the client during the session; and
 - c. Client's local emergency contacts.



STATE OF ARIZONA
BOARD OF BEHAVIORAL HEALTH EXAMINERS
1740 WEST ADAMS STREET, SUITE 3600
PHOENIX, AZ 85007
PHONE: (602) 364-0890 FAX: 602.364.0890
Board Website: www.azbbhe.us
Email Address: information@azbbhe.us

DOUGLAS A. DUCEY
Governor

TOBI ZAVALA
Executive Director

February 27, 2020

Trista Guzman Glover
Director – Boards and Commissions
1700 West Washington St, Suite 250
Phoenix, AZ 85007

RE: Request for Approval of Rule Making

Dear Ms. Guzman Glover,

In response to your request, following is a summarized list of proposed rule changes and a description of how the revision would reduce burdens or clarify the rule.

Rule changes recommended for purposes of reducing/eliminating burdens

R4-6-215 – proposing eliminating the \$100 license issuance fee and allowing one payment for multiple fees.

- *Currently all applicants recommended for licensure are required to pay a \$100 issuance fee. Eliminating the fee reduces a financial burden on applicants and reduces the time required to issue licenses.*
- *Applicants have been required to pay their criminal background check fee on a separate payment from their application fee. Eliminating this restriction will allow applicants to submit one payment for multiple fees.*

R4-6-216 – proposing expanding the options for foreign equivalency evaluation services.

- *Current rule requires that an applicant with education in a foreign country submit an evaluation by an entity approved by the Board. Expanding that to include evaluation services who are members of a national accrediting body allows applications more options to receive this service.*

R4-6-304 – proposing removing the requirement that other states verify that an applicant has no pending complaints.

- *Many states (including Arizona) will not disclose their licensees' pending complaint status to the public, so often applicants cannot comply with this requirement. Board applications include a background question regarding pending complaints, so applicants are required to self-disclose if they currently have an open complaint, so it's unnecessary for it to be included on the state verification of licensure.*

R4-6-502 – proposing deeming associate level counselors who acquired their license through Universal Recognition or endorsement to meet the examination requirements.

- *Applicants who acquire their associate level license by endorsement or Universal Recognition are deemed to have met the exam requirements in their previous state. Under current rule, when they apply for independent licensure in Arizona, they are no longer using the endorsement process, so they would need to pass a Board approved examination to be able to upgrade. Adding the proposed revision removes the burden of a future examination for those who have been licensed in Arizona by endorsement or Universal Recognition.*

R4-6-504 – proposing expanding the options for associate level counselors to receive clinical supervision

- *Current rule requires an associate level counselor to receive a minimum of 50 hours of clinical supervision from a Licensed Professional Counselor. Removing this restriction allows associate level counselors to receive supervision from other qualified behavioral health professionals which reduces the burden of having to hire a clinical supervisor when an LPC is unavailable at the agency or practice in which supervision occurs.*

R4-6-602 – proposing deeming associate level marriage and family therapists who acquired their license through Universal Recognition or endorsement to meet the examination requirements.

- *Applicants who acquire their associate level license by endorsement or Universal Recognition are deemed to have met the exam requirements in their previous state. Under current rule, when they apply for independent licensure in Arizona, they are no longer using the endorsement process, so they would need to pass a Board approved examination to be able to upgrade. Adding the proposed revision removes the burden of a future examination for those who have been licensed in Arizona by endorsement or Universal Recognition.*

R4-6-604 – proposing expanding the options for associate level marriage and family therapists to receive clinical supervision.

- *Current rule requires an associate level marriage and family therapist to receive a minimum of 75 hours of clinical supervision from a Licensed Marriage and Family Therapist. Reducing this requirement to 50 hours and allowing other behavioral health professionals holding an AAMFT Approved Supervisor designation to provide them expands access for associate level marriage and family therapists to receive supervision, which reduces the burden of having to hire a clinical supervisor from outside the agency or practice.*

R4-6-701 – proposing removing specificity from coursework required for substance abuse licensure.

- *Current rule lists specific elements which must be covered in required core content area courses to meet the curriculum requirements for substance abuse licensure. Removing some of the specificity reduces the burden of having a course rejected because it may not cover one of many elements listed.*

R4-6-706 – proposing expanding the options for associate level substance abuse counselors to receive clinical supervision.

- *Current rule requires an associate level substance abuse counselor to receive a minimum of 50 hours of clinical supervision from a Licensed Independent Substance Abuse Counselor. Allowing other behavioral health professionals with knowledge and experience in substance use disorder treatment to provide supervision expands access for associate level substance abuse counselors to receive it, which reduces the burden of having to hire a clinical supervisor from outside the agency or practice.*

Rule changes recommended for purposes of providing clarification and reducing confusion

R4-6-101 – proposing removing an unused definition (does not appear in text of rule any more) and updating the definition of regionally accredited.

R4-6-211 – proposing clarifying the limitations for associate level licensees who opt to participate in supervised private practice.

R4-6-212 – proposing clarifying the documentation requirements for clinical supervision sessions and citations related to Indian Health Services changed in USC.

R4-6-212.01 – proposing eliminating an exemption which will be unnecessary when the options for clinical supervision are expanded in R4-6-504, 604, and 706 (above). Also proposing clarifying the acceptance of clinical supervision hours for applicants acquiring supervised work experience outside of Arizona.

R4-6-214 – proposing removing outdated language and simplifying the clinical supervision educational requirements, and naming the Board approved tutorial to avoid confusion.

R4-6-402 – proposing removing outdated language not in alignment with A.R.S. § 32-3274 (effective August 3, 2018) which removed the exam requirement for applicants by endorsement.

R4-6-501 – proposing clarifying curriculum requirements for associate level licensees that earned their license by endorsement and subsequently apply for independent licensure by examination.

R4-6-601 – proposing clarifying curriculum requirements for associate level licensees that earned their license by endorsement and subsequently apply for independent licensure by examination.

R4-6-704 – proposing removing outdated language referring to the period prior to 11/1/2015.

R4-6-802 – proposing naming the Board approved tutorial to avoid confusion.

R4-6-1101 – proposing aligning the rule with the definition in R4-6-101(36).

R4-6-1106 – proposing clarifying the progress note requirement of an emergency plan for clients treated through telepractice.

Thank you for your consideration of this request. I am available to answer any questions pertaining to this request at 520-964-7000.

Sincerely,



Tobi Zavala
Executive Director

From: [Patricia Mcsorley](mailto:Patricia.Mcsorley@azmd.gov) on behalf of [Patricia Mcsorley <patricia.mcsorley@azmd.gov>](mailto:Patricia.Mcsorley@azmd.gov)
To: [Trista Guzman \(tguzman@az.gov\)](mailto:Trista.Guzman@az.gov)
Subject: Fwd: 30316 Puterbaugh.Merlin Universal Application-DNQ
Date: Wednesday, March 4, 2020 9:53:46 AM

PURSUANT TO EXECUTIVE ORDER, THE MEDICAL BOARD ASKS THAT YOU REVIEW THIS REQUEST TO DENY A UNIVERSAL LICENSE BECAUSE Dr. PUTERBAUGH DOES NOT HOLD AN ACTIVE LICENSE.

Dr. Puterbaugh does not qualify because he does not have an active license. It has been the policy of the Agency if the physician applicant does not meet the qualifications for a Universal Recognition License, that the fee paid is transferred to the application for an initial license.

Best regards,

Pat

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

From: **Laura Bryan** <laura.bryan@azmd.gov>
Date: Tue, Mar 3, 2020 at 12:48 PM
Subject: 30316 Puterbaugh.Merlin Universal Application-DNQ
To: Patricia Mcsorley <patricia.mcsorley@azmd.gov>
Cc: Kristina Fredericksen <kristina.fredericksen@azmd.gov>

Hi Pat,

Dr. Puterbaugh does not qualify because he does not have an active license. He has already applied online as a regular MD initial application no fees.

Let me know if I can move forward with withdrawing the Universal application and transfer fee to the regular MD application.

Best regards,

Laura B

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

From: **Mary Dunavant** <mary.dunavant@azmd.gov>
Date: Fri, Feb 21, 2020 at 7:35 AM
Subject: 30316 Puterbaugh.Merlin Universal Application-DNQ
To: Laura Bryan <laura.bryan@azmd.gov>, Joseph Nardo <joseph.nardo@azmd.gov>

Laura and Jor,

This application does not qualify for the Universal Recognition Application as the physician does not have an active license in another jurisdiction.

Thank you.

Mary Dunavant

Senior Licensing Coordinator
Arizona Medical Board and
Arizona Regulatory Board of Physician Assistants
1740 W. Adams, Suite 4000
Phoenix, AZ 85007
Phone (480) 551-2704 Fax (480) 551-2704



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Patricia McSorley

Executive Director

Arizona Medical Board

Arizona Regulatory Board of

Physician Assistants

From: [Trista Guzman Glover](mailto:tguzman@az.gov) on behalf of [Trista Guzman Glover <tguzman@az.gov>](mailto:tguzman@az.gov)
To: [Patricia Mcsorley](mailto:patricia.mcsorley@azmd.gov)
Subject: Re: 30316 Puterbaugh.Merlin Universal Application-DNQ
Date: Wednesday, March 4, 2020 3:06:08 PM

Good Afternoon, Pat -

Thanks for your email. Two questions - what state does the applicant have an inactive license; and does the applicant have an active license in any other states?

Trista

Trista Guzman Glover | **Office of Arizona Governor Doug Ducey**

Director, Boards and Commissions

www.azgovernor.gov



On Wed, Mar 4, 2020 at 9:53 AM Patricia Mcsorley <patricia.mcsorley@azmd.gov> wrote:

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Phoenix, AZ 85007
Fax (480) 551-2704



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Patricia McSorley

Executive Director

Arizona Medical Board

Arizona Regulatory Board of

Physician Assistants

From: [Patricia Mcorley](#) on behalf of [Patricia Mcorley <patricia.mcorley@azmd.gov>](#)
To: [Trista Guzman Glover](#)
Subject: Re: 30316 Puterbaugh.Merlin Universal Application-DNQ
Date: Wednesday, March 4, 2020 3:39:28 PM
Attachments: [image.png](#)

Trista,

Below is the information from the American Medical Association document the Board uses to verify licensure status. As you can see, Dr. Puterbaugh does not hold any active license in any state at this time. He allowed his Arizona license to lapse in 2016.

Current and/or historical medical licensure

License No.	MD / DO	Jurisdiction	Date Granted	Expiration Date	Renewal Date	Status	License Type	Last Reported
C00029719	MD	CA	12/19/1967	12/31/2017		INACTIVE	UNLTD	02/05/2020
MD30316	MD	AZ	05/10/2002	04/12/2016	12/19/2013	INACTIVE	UNLTD	02/03/2020
35023687	MD	OH	08/26/1959	12/31/1972	01/01/2000	INACTIVE	UNLTD	02/06/2020

Thanks
Pat

On Wed, Mar 4, 2020 at 3:06 PM Trista Guzman Glover <tguzman@az.gov> wrote:
Good Afternoon, Pat -

Thanks for your email. Two questions - what state does the applicant have an inactive license; and does the applicant have an active license in any other states?

Trista

Trista Guzman Glover | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions

www.azgovernor.gov



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Mary Dunavant

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Patricia McSorley
Executive Director
Arizona Medical Board
Arizona Regulatory Board of
Physician Assistants

--

Patricia McSorley
Executive Director
Arizona Medical Board
Arizona Regulatory Board of
Physician Assistants

From: [Trista Guzman Glover](#) on behalf of [Trista Guzman Glover <tguzman@az.gov>](#)
To: [Patricia Mcsorley](#)
Subject: Re: 30316 Puterbaugh.Merlin Universal Application-DNQ
Date: Wednesday, March 4, 2020 4:19:31 PM
Attachments: [image.png](#)

Pat -

Thanks for the information and for elevating this information to our office. I agree that this applicant does not meet the universal recognition requirements, and I appreciate your team's help in having the individual apply for an initial license and making that process as easy as possible.

Trista

Trista Guzman Glover | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions

www.azgovernor.gov



On Wed, Mar 4, 2020 at 3:39 PM Patricia Mcsorley <patricia.mcsorley@azmd.gov> wrote:

Trista,

Below is the information from the American Medical Association document the Board uses to verify licensure status. As you can see, Dr. Puterbaugh does not hold any active license in any state at this time. He allowed his Arizona license to lapse in 2016.

Current and/or historical medical licensure

License No.	MD / DO	Jurisdiction	Date Granted	Expiration Date	Renewal Date	Status	License Type	Last Reported
C00029719	MD	CA	12/19/1967	12/31/2017		INACTIVE	UNLTD	02/05/2020
MD30316	MD	AZ	05/10/2002	04/12/2016	12/19/2013	INACTIVE	UNLTD	02/03/2020
35023687	MD	OH	08/26/1959	12/31/1972	01/01/2000	INACTIVE	UNLTD	02/06/2020

Thanks

Pat

On Wed, Mar 4, 2020 at 3:06 PM Trista Guzman Glover <tguzman@az.gov> wrote:

Good Afternoon, Pat -

Thanks for your email. Two questions - what state does the applicant have an inactive license; and does the applicant have an active license in any other states?

Trista

Trista Guzman Glover | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions

www.azgovernor.gov



On Wed, Mar 4, 2020 at 9:53 AM Patricia Mcsorley <patricia.mcsorley@azmd.gov> wrote:

PURSUANT TO EXECUTIVE ORDER, THE MEDICAL BOARD ASKS THAT YOU REVIEW THIS REQUEST TO DENY A UNIVERSAL LICENSE BECAUSE Dr. PUTERBAUGH DOES NOT HOLD AN ACTIVE LICENSE.

Dr. Puterbaugh does not qualify because he does not have an active license. It has been the policy of the Agency if the physician applicant does not meet the qualifications for a Universal Recognition License, that the fee paid is transferred to the application for an initial license.

Best regards,

Pat

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

From: **Laura Bryan** <laura.bryan@azmd.gov>

Date: Tue, Mar 3, 2020 at 12:48 PM

Subject: 30316 Puterbaugh.Merlin Universal Application-DNQ

To: Patricia Mcsorley <patricia.mcsorley@azmd.gov>

Cc: Kristina Fredericksen <kristina.fredericksen@azmd.gov>

Hi Pat,

Dr. Puterbaugh does not qualify because he does not have an active license. He has already applied online as a regular MD initial application no fees.

Let me know if I can move forward with withdrawing the Universal application and transfer fee to the regular MD application.

Best regards,

Laura B

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

From: **Mary Dunavant** <mary.dunavant@azmd.gov>

Date: Fri, Feb 21, 2020 at 7:35 AM

Subject: 30316 Puterbaugh.Merlin Universal Application-DNQ

To: Laura Bryan <laura.bryan@azmd.gov>, Joseph Nardo <joseph.nardo@azmd.gov>

Laura and Jor,

This application does not qualify for the Universal Recognition Application as the physician does not have an active license in another jurisdiction.

Thank you.

Mary Dunavant

Senior Licensing Coordinator
Arizona Medical Board and
Arizona Regulatory Board of Physician Assistants
1740 W. Adams, Suite 4000
Phoenix, AZ 85007
Fax (480) 551-2704



--

Patricia McSorley

Executive Director

Arizona Medical Board

Arizona Regulatory Board of

Physician Assistants

--

Patricia McSorley

Executive Director

Arizona Medical Board

Arizona Regulatory Board of

Physician Assistants

From: [Trista Guzman Glover](#) on behalf of [Trista Guzman Glover <tguzman@az.gov>](#)
To: [Patricia Mcsorley](#)
Cc: [Laura Bryan](#); [Joseph Nardo](#); [Laura Canez](#)
Subject: Re: Prashant Krishnan, MD
Date: Monday, March 16, 2020 9:31:48 AM

Good Morning, Pat -

Thanks for the information and for elevating this information to our office. I agree that this applicant does not meet the universal recognition requirements, and I appreciate your team's help in having the individual apply for an initial license and making that process as easy as possible.

Be well,
Trista

Trista Guzman Glover | **Office of Arizona Governor Doug Ducey**
Director, Boards and Commissions
500 Washington Street, Suite 1000
www.azgovernor.gov



On Fri, Mar 13, 2020 at 5:13 PM Patricia Mcsorley <patricia.mcsorley@azmd.gov> wrote:
Trista,

Dr. Krishnan, #59689, does not qualify for the Universal License, as he does not meet the residency requirement. Please see Dr. Krishnan's attached application where both his practice and home address are in Colorado Springs, CO. As is our policy, Staff would like to get your approval to continue him on the regular initial application track and apply the fee from the Universal Application to the initial application.

Please advise.

Pat

Patricia McSorley

Executive Director

Arizona Medical Board

Arizona Regulatory Board of

Physician Assistants

From: [Trista Guzman Glover](#) on behalf of [Trista Guzman Glover <tguzman@az.gov>](#)
To: [Tobi Zavala](#)
Subject: Re: Wilmer Soto Galindez
Date: Tuesday, September 8, 2020 2:42:41 PM

Thanks for this information, Tobi. This email serves as approval for your request.

Best,
Trista

Trista Guzman Glover | **Office of Arizona Governor Doug Ducey**
Director, Boards and Commissions

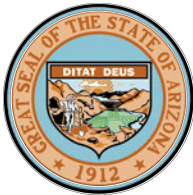
www.azgovernor.gov



On Mon, Aug 31, 2020 at 1:45 PM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:

Pursuant to EO 2020-02 I request approval for our Board to deny Mr. Galindez licensure under Universal Recognition. Mr. Galindez has a certificate in Puerto Rico for substance abuse addiction; however it is not from a regulatory entity as outlined in ARS 32-4302(A)(1). Please let me know if you approve or if you need any additional information.

Tobi Zavala, Executive Director



ARIZONA BOARD OF BEHAVIORAL HEALTH EXAMINERS
1740 W. Adams Street, Suite 3600, Phoenix, AZ 85007
Phone: [602-542-1617](tel:602-542-1617) Fax: [602-364-0890](tel:602-364-0890)
Email: tobi.zavala@azbbhe.us
Board Website: www.azbbhe.us

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From: [Kimberly Scoplitte](#) on behalf of [Kimberly Scoplitte <kscoplitte@azboc.gov>](mailto:kscoplitte@azboc.gov)
To: [Trista Guzman Glover](#)
Cc: [Theresa Bunch](#); [Irma Telles](#)
Subject: Universal Recognition Application
Date: Monday, November 16, 2020 10:55:30 AM

Good morning Trista,

We have a Universal Recognition Application which needs to be denied. To my understanding any Universal Recognition Application that is denied needs to be sent to the Governor's Office to review prior to being denied. Please know that the agency has never denied a Universal Recognition Application however, this individual who has applied was found to be working prior licensure which this would be an automatic denial as licensees can not start working until they have received their license. Generally this type of a violation would go before the Board and would be granted licensure upon a civil penalty being paid prior to receiving their license.

An individual can not work prior to receiving their license pursuant to 32-574 (A)(1)(2) Unlawful acts; violation; classification.

(A) A person shall not:

(1) Perform or attempt to perform cosmetology, aesthetics, nail technology or hairstyling without a license in that category issued pursuant to this chapter, or practice in a category in which the person does not hold a license.

(2) Display a sign or in any way advertise or hold oneself out as a cosmetologist, aesthetician, nail technician or hairstylist or as being engaged in the practice or business of cosmetology, aesthetics, nail technician or hairstyling without being licensed pursuant to this chapter.

Please advise as to whether the Board can proceed with the denial process.

Thank you.

Kimberly Scoplitte
Executive Director
Arizona State Board of Cosmetology
1740 W. Adams
Phoenix, AZ 85007

kscoplitte@azboc.gov

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From: [Kimberly Scoplitte](#) on behalf of [Kimberly Scoplitte <kscoplitte@azboc.gov>](mailto:kscoplitte@azboc.gov)
To: [Trista Guzman Glover](#)
Cc: [Theresa Bunch](#); [Irma Telles](#)
Subject: Universal Recognition Application
Date: Tuesday, November 17, 2020 9:45:18 AM

Good morning Trista,

We have a Universal Recognition Application which needs to be denied. To my understanding any Universal Recognition Application that is denied needs to be sent to the Governor's Office to review prior to being denied. Please know that the agency has never denied a Universal Recognition Application however, this individual who has applied was found to be working prior licensure which this would be an automatic denial as licensees can not start working until they have received their license. Generally this type of a violation would go before the Board and would be granted licensure upon a civil penalty being paid prior to receiving their license.

An individual can not work prior to receiving their license pursuant to 32-574 (A)(1)(2) Unlawful acts; violation; classification.

(A) A person shall not:

(1) Perform or attempt to perform cosmetology, aesthetics, nail technology or hairstyling without a license in that category issued pursuant to this chapter, or practice in a category in which the person does not hold a license.

(2) Display a sign or in any way advertise or hold oneself out as a cosmetologist, aesthetician, nail technician or hairstylist or as being engaged in the practice or business of cosmetology, aesthetics, nail technician or hairstyling without being licensed pursuant to this chapter.

Please advise as to whether the Board can proceed with the denial process.

Thank you.

Kimberly Scoplitte
Executive Director
Arizona State Board of Cosmetology
1740 W. Adams
Phoenix, AZ 85007

kscoplitte@azboc.gov

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From: [Trista Guzman Glover](#) on behalf of [Trista Guzman Glover <tguzman@az.gov>](#)
To: [Kimberly Scoplitte](#)
Cc: [Theresa Bunch](#); [Irma Telles](#)
Subject: Re: Universal Recognition Application
Date: Tuesday, November 17, 2020 9:46:59 AM

How is the civil penalty determined? In an instance like this, will the individual still have to pay a civil penalty?

Trista

Trista Guzman Glover | **Office of Arizona Governor Doug Ducey**

Director, Boards and Commissions

600 North Central Expressway, Suite 1000

www.azgovernor.gov



On Tue, Nov 17, 2020 at 9:45 AM Kimberly Scoplitte <kscoplitte@azboc.gov> wrote:

Good morning Trista,

We have a Universal Recognition Application which needs to be denied. To my understanding any Universal Recognition Application that is denied needs to be sent to the Governor's Office to review prior to being denied. Please know that the agency has never denied a Universal Recognition Application however, this individual who has applied was found to be working prior licensure which this would be an automatic denial as licensees can not start working until they have received their license. Generally this type of a violation would go before the Board and would be granted licensure upon a civil penalty being paid prior to receiving their license.

An individual can not work prior to receiving their license pursuant to 32-574 (A)(1)(2) Unlawful acts; violation; classification.

(A) A person shall not:

- (1) Perform or attempt to perform cosmetology, aesthetics, nail technology or hairstyling without a license in that category issued pursuant to this chapter, or practice in a category in which the person does not hold a license.
- (2) Display a sign or in any way advertise or hold oneself out as a cosmetologist, aesthetician, nail technician or hairstylist or as being engaged in the practice or business of cosmetology, aesthetics, nail technician or hairstyling without being licensed pursuant to this chapter.

Please advise as to whether the Board can proceed with the denial process.

Thank you.
Kimberly Scoplitte
Executive Director

Arizona State Board of Cosmetology
1740 W. Adams
Phoenix, AZ 85007

kscoplitte@azboc.gov

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From: [Kimberly Scoplitte](#) on behalf of [Kimberly Scoplitte <kscoplitte@azboc.gov>](#)
To: [Trista Guzman Glover](#)
Cc: [Theresa Bunch](#); [Irma Telles](#)
Subject: Re: Universal Recognition Application
Date: Tuesday, November 17, 2020 11:37:38 AM

Good morning Trista,

We have answered your questions below.

1. How is the civil penalty determined? **The Board follows the approved recommended parameters for civil penalties.**

2. In an instance like this, will the individual still have to pay a civil penalty? **Yes, the law 32-574 (A)(1)(2) Unlawful acts; violation; classification (indicated in the prior email) along with A.A.C. R4-10-106 (F) Licensing Time Frame states an individual shall not practice as an aesthetician, cosmetologist, instructor or nail technician until the individual receives and posts the license at the individual's place of employment. Any individual who is found working prior to receiving their license whether it is through the Boards Reciprocity application or Reciprocity through the Universal Recognition application would go through the denial process and will be issued a civil penalty of \$250. Once the civil penalty has been paid the license will be issued to the individual. The law is the same and should be applied in the same manner no matter how an individual obtains a license in the state. Reciprocity individuals who are licensed through another state are instructed in school they must have a current license to perform services.**

We hope this information is helpful as we are looking for you to give us the ok to move forward in the process as this case needs to go before the Board.

We thank you for your consideration in this matter.

Sincerely,

Kimberly Scoplitte
Executive Director
Arizona State Board of Cosmetology
1740 W. Adams
Phoenix, AZ 85007
kscoplitte@azboc.gov

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On Tue, Nov 17, 2020 at 9:47 AM Trista Guzman Glover <tguzman@az.gov> wrote:

How is the civil penalty determined? In an instance like this, will the individual still have to pay a civil penalty?

Trista

Trista Guzman Glover | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions

www.azgovernor.gov



On Tue, Nov 17, 2020 at 9:45 AM Kimberly Scoplitte <kscoplitte@azboc.gov> wrote:
Good morning Trista,

We have a Universal Recognition Application which needs to be denied. To my understanding any Universal Recognition Application that is denied needs to be sent to the Governor's Office to review prior to being denied. Please know that the agency has never denied a Universal Recognition Application however, this individual who has applied was found to be working prior licensure which this would be an automatic denial as licensees can not start working until they have received their license. Generally this type of a violation would go before the Board and would be granted licensure upon a civil penalty being paid prior to receiving their license.

An individual can not work prior to receiving their license pursuant to 32-574 (A)(1)(2) Unlawful acts; violation; classification.

(A) A person shall not:

(1) Perform or attempt to perform cosmetology, aesthetics, nail technology or hairstyling without a license in that category issued pursuant to this chapter, or practice in a category in which the person does not hold a license.

(2) Display a sign or in any way advertise or hold oneself out as a cosmetologist, aesthetician, nail technician or hairstylist or as being engaged in the practice or business of cosmetology, aesthetics, nail technician or hairstyling without being licensed pursuant to this chapter.

Please advise as to whether the Board can proceed with the denial process.

Thank you.
Kimberly Scoplitte
Executive Director
Arizona State Board of Cosmetology
1740 W. Adams
Phoenix, AZ 85007

kscoplitte@azboc.gov

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Cosmetology at 400.411.2373. If you are not the intended recipient, please be advised that any distribution, dissemination or copying of this communication is strictly prohibited.

From: [Kimberly Scoplitte](#) on behalf of [Kimberly Scoplitte <kscoplitte@azboc.gov>](mailto:kscoplitte@azboc.gov)
To: [Trista Guzman Glover](#)
Cc: [Theresa Bunch](#); [Irma Telles](#)
Subject: Re: Universal Recognition Application
Date: Wednesday, November 18, 2020 10:09:57 AM

Good morning Trista,

We wanted to see if you had received the email sent yesterday and if you have made a decision to allow the Board to proceed as this case is to be heard at the Board meeting on Friday.

We have included additional information that may help in making a decision.

Additional Information:

September 14, 2020, the individual was found operating and performing a pedicure service at a salon with the individual's Missouri license posted during a routine inspection. The Board had not yet received an application from the individual. September 18, 2020, Board office received the Arizona Universal Licensing application from the applicant.

October 6, 2020, Board staff mailed a Send-Back Letter to the applicant requesting certification letter from the State of Missouri,

As of October 19, 2020, the applicant has not contacted the Board office nor has the certification letter from the State of Missouri been received.

We thank you again for your consideration in this matter.

Sincerely,

Kimberly Scoplitte
Executive Director
Arizona State Board of Cosmetology
1740 W. Adams
Phoenix, AZ 85007
kscoplitte@azboc.gov

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From: [Kimberly Scoplitte](#) on behalf of [Kimberly Scoplitte <kscoplitte@azboc.gov>](#)
To: [Trista Guzman Glover](#)
Subject: Re: Universal Recognition Application
Date: Thursday, November 19, 2020 8:31:05 AM
Attachments: [AZ Universal Licensing Recognition Application.pdf](#)

Good morning Trista,

We are going to remove the denial case from the agenda as we must post the agenda by 8:45 a.m. this morning and we will put the case back on for the December Board meeting in hopes we will have been advised prior to the meeting that the Board can move forward.

Also please find attached the Arizona Universal Licensing Recognition Application in sections 6 specifies licensee responsibility & 7 is where the applicant has acknowledged that they have read and understood this application.

We thank you for your time in this matter.

Sincerely,

Kimberly Scoplitte
Executive Director
Arizona State Board of Cosmetology
1740 W. Adams
Phoenix, AZ 85007
kscoplitte@azboc.gov

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ARIZONA UNIVERSAL LICENSING RECOGNITION APPLICATION

A.R.S. § 32-4302

PART I: PERSONAL DATA (Please print)

Full Name: First, Middle, Last Name (All names must match)			PLACE CURRENT 2X2 PHOTO HERE USE A PAPERCLIP
First Name	Middle Name	Last Name	
Address:			
City:	State:	Zip:	
Date of Birth: mm/dd/yyyy	Social Security #: XXX-XX-XXXX		
Check one: <input type="checkbox"/> Male <input type="checkbox"/> Female	Phone #:	Email Address:	

PART II: APPLICATION FEE

\$140.00 - Pay by either cashier's check or money order only. Personal checks or cash are not accepted. Fees are NON refundable. Pursuant to **A.R.S. § 41-1080.01**, if this is your first time applying and your family income does not exceed 200% of the Federal Poverty Guidelines, you may qualify for a one-time waiver of the Board's first time license of \$140.00. If you think you may qualify for this fee waiver, please check here and enclose a copy of your family's previous year's submitted and signed Federal tax returns. <https://familiesusa.org/product/federal-poverty-guidelines>

If fee is enclosed

***Incomplete applications will be returned and will delay process of license**

PART III: LICENSING

Which license type are you seeking?

Cosmetology Hairstyling Aesthetic Nail Technology

Instructor type: Cosmetology Hairstyling Aesthetic Nail Technology

- Have you ever held a cosmetologist, hairstyling, aesthetician, nail technician or instructor's license in Arizona?
 - Yes - License #: _____ Name on license: _____ No
- If you are Military or Military spouse: check here Submit a copy of your military orders

List all state in which you are currently licensed or certified in: **(below)** Is it in "Good Standings": Yes No

***Certification of license or certification is required to be emailed to: azboard@azboc.gov**

List State(s):

PART IV: PROOF OF RESIDENCE

Proof type of residency: Submit one the following (Check box)

Valid Arizona driver's license Current Arizona motor vehicle registration Arizona voter registration A dated residential rental contract with proof of payment Proof of establishment of Arizona utilities Proof of enrollment of children in Arizona schools Grades K - 12 Documentation demonstrating a change in permanent address on all pertinent records Military form 2058

Valid Arizona driver's license Current Arizona motor vehicle registration Arizona voter registration A dated residential rental contract with proof of payment Proof of establishment of Arizona utilities Proof of enrollment of children in Arizona schools Grades K - 12 Documentation demonstrating a change in permanent address on all pertinent records Military form 2058

PART V: ARIZONA STATEMENT OF CITIZENSHIP OR ALIEN STATUS FOR STATE PUBLIC BENEFITS

Check if completed and attached: Yes, I have completed the attached form for Statement of Citizenship or Alien Status for State Public Benefits and submitted required documents. No, state why?

PART VI: LICENSEE RESPONSIBILITY

You, as a licensee, will be responsible for the following:

- **License Renewal**

- * Check your expiration date on the license. Arizona personal license expires every two (2) years. You will not receive a reminder, post it on your calendar. Late fees will be applied to any license that is not renewed on time. Your current license must be posted at all times when working.

- **Compliance with Laws and Rules**

- * As a licensee, you are responsible for ensuring compliance with all applicable laws and rules. Laws and rules can be found at: <https://boc.az.gov/licensing/laws-rules>
 - Review and know: A.A.C. § R4-10-112 Infection Control and Safety Standards

- **Notice of Changes**

- If you change your legal name or address, you must notify the Board. Address changes may be completed online at:
<https://azbocprod.glsuite.us/GLSuiteWeb/clients/azboc/private/renewals/login.aspx> or contact the Board. Name changes must be reported by mail or in person with proper documentation A.A.C. § R4-10-107 (A)(2)(b)

*PART VII APPLICATION CERTIFICATION

I hereby certify under penalty of perjury, that I have read and understood this application for Arizona Universal Licensing Recognition, and know that contents thereof; that all my statements and information disclosed herein and in the attached forms, including all supporting documents, are true, accurate and correct in every respect; and that I have not failed to disclose any information that might affect my application, with full knowledge that the information submitted in this application may constitute a violation of the law and may be grounds for denial of my application for disciplinary action against my application/license.

Applicant Signature:

Date:

Pursuant to section 41-1093.01, Arizona Revised Statute, an agency shall limit all occupational regulations to regulations that are demonstrated to be necessary to specifically fulfill a public health, safety or welfare concern. Pursuant to sections 41-1093.02 and 41-1093.03, Arizona Revised Statutes, you have the right to petition this agency to repeal or modify the occupational regulation or bring an action in a court of general jurisdiction to challenge the occupational regulation and to ensure compliance with section 41-1093.01, Arizona Revised Statutes.

From: [Trista Guzman Glover](#) on behalf of [Trista Guzman Glover <tguzman@az.gov>](#)
To: [Kimberly Scoplitte](#)
Subject: Re: Universal Recognition Application
Date: Thursday, November 19, 2020 10:14:40 AM

Hi, Kim -

I guess my biggest question is, if this individual receives a civil penalty from the board and pays that, are they then able to apply again for another UR license and have it granted at that time?

Trista

Trista Guzman Glover | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions

www.azgovernor.gov



On Thu, Nov 19, 2020 at 8:31 AM Kimberly Scoplitte <kscoplitte@azboc.gov> wrote:

Good morning Trista,

We are going to remove the denial case from the agenda as we must post the agenda by 8:45 a.m. this morning and we will put the case back on for the December Board meeting in hopes we will have been advised prior to the meeting that the Board can move forward.

Also please find attached the Arizona Universal Licensing Recognition Application in sections 6 specifies licensee responsibility & 7 is where the applicant has acknowledged that they have read and understood this application.

We thank you for your time in this matter.

Sincerely,

Kimberly Scoplitte
Executive Director
Arizona State Board of Cosmetology
1740 W. Adams
Phoenix, AZ 85007

kscoplitte@azboc.gov

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recipient, please immediately notify the sender or contact the Arizona State Board of Cosmetology at 1-800-700-0000. If you are not the intended recipient, please be advised that any distribution, dissemination or copying of this communication is strictly prohibited.

From: [Trista Guzman Glover](mailto:tguzman@az.gov) on behalf of [Trista Guzman Glover <tguzman@az.gov>](mailto:tguzman@az.gov)
To: [Kimberly Scoplitte](mailto:kscoplitte@azboc.gov)
Cc: [Theresa Bunch](mailto:theresa.bunch@azboc.gov); [Irma Telles](mailto:irma.telles@azboc.gov)
Subject: Re: Universal Recognition Application
Date: Thursday, November 19, 2020 2:36:09 PM

Kim -

Thank you for explaining the process to me. The denial of the UR license is approved. Please make sure to communicate the process to the applicant and let them know once they complete all steps of the process they will then be able to get their license through Universal Recognition. Thanks, again.

Trista

Trista Guzman Glover | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions

www.azgovernor.gov



On Tue, Nov 17, 2020 at 11:37 AM Kimberly Scoplitte <kscoplitte@azboc.gov> wrote:
Good morning Trista,

We have answered your questions below.

1. How is the civil penalty determined? **The Board follows the approved recommended parameters for civil penalties.**
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forward in the process as this case needs to go before the Board.

We thank you for your consideration in this matter.

Sincerely,

Kimberly Scoplitte
Executive Director
Arizona State Board of Cosmetology
1740 W. Adams
Phoenix, AZ 85007

kscoplitte@azboc.gov

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On Tue, Nov 17, 2020 at 9:47 AM Trista Guzman Glover <tguzman@az.gov> wrote:

How is the civil penalty determined? In an instance like this, will the individual still have to pay a civil penalty?

Trista

Trista Guzman Glover | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions

www.azgovernor.gov



On Tue, Nov 17, 2020 at 9:45 AM Kimberly Scoplitte <kscoplitte@azboc.gov> wrote:
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An individual can not work prior to receiving their license pursuant to 32-574 (A)(1)(2) Unlawful acts; violation; classification.

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(2) Display a sign or in any way advertise or hold oneself out as a cosmetologist, aesthetician, nail technician or hairstylist or as being engaged in the practice or business of cosmetology, aesthetics, nail technician or hairstyling without being licensed pursuant to this chapter.

Please advise as to whether the Board can proceed with the denial process.

Thank you.

Kimberly Scoplitte

Executive Director

Arizona State Board of Cosmetology

1740 W. Adams

Phoenix, AZ 85007

...

kscoplitte@azboc.gov

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From: [Kimberly Scoplitte](#) on behalf of [Kimberly Scoplitte <kscoplitte@azboc.gov>](#)
To: [Trista Guzman Glover](#)
Subject: Re: Universal Recognition Application
Date: Thursday, November 19, 2020 2:39:13 PM

Trista, your welcome and thank you.

Sincerely,

Kimberly Scoplitte
Executive Director
Arizona State Board of Cosmetology
1740 W. Adams
Phoenix, AZ 85007
kscoplitte@azboc.gov

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Trista

Trista Guzman Glover | **Office of Arizona Governor Doug Ducey**
Director, Boards and Commissions

www.azgovernor.gov



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We thank you for your consideration in this matter.

Sincerely,

Kimberly Scoplitte
Executive Director
Arizona State Board of Cosmetology
1740 W. Adams
Phoenix, AZ 85007
Phone: 480-784-4632
kscoplitte@azboc.gov

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Trista

Trista Guzman Glover | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions
www.azgovernor.gov



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Please advise as to whether the Board can proceed with the denial process.

Thank you.

Kimberly Scoplitte
Executive Director
Arizona State Board of Cosmetology
1740 W. Adams
Phoenix, AZ 85007

kscoplitte@azboc.gov

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From: [Pat Mcsorley](#) on behalf of [Pat Mcsorley <patricia.mcsorley@azmd.gov>](#)
To: [Gabee Lepore](#)
Subject: Re: Universal Recognition Request
Date: Monday, December 7, 2020 3:03:56 PM

Will do.
Pat

On Mon, Dec 7, 2020 at 2:58 PM Gabee Lepore <glepore@az.gov> wrote:

Hi Pat,

I hope you are well! I spoke to a gentleman today who is a doctor licensed in California and is looking to be licensed here. He is a resident here and has been for some time. He is 87 years old, so I wanted to ask if you would mind having someone reach out to him to answer his questions.

Dr. Richard Hochman

C.R. 2020000000

H. 2020000000

[www.azgovernor.gov](#)

Thank you very much! Let me know if you have any questions.

Gabee

--

Gabriella Lepore | Office of Arizona Governor Doug Ducey
Deputy Director, Boards and Commissions

[www.azgovernor.gov](#)

www.azgovernor.gov



--

Patricia McSorley

Executive Director

Arizona Medical Board

Arizona Regulatory Board of

Physician Assistants

From: [Gabee Lepore](#) on behalf of [Gabee Lepore <glepore@az.gov>](#)
To: [Pat Mcsorley](#)
Subject: Re: Universal Recognition Request
Date: Monday, December 7, 2020 3:04:40 PM

Thank you! I appreciate it.

On Mon, Dec 7, 2020 at 3:03 PM Pat Mcsorley <patricia.mcsorley@azmd.gov> wrote:

Will do.
Pat

On Mon, Dec 7, 2020 at 2:58 PM Gabee Lepore <glepore@az.gov> wrote:

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Dr. Richard Hochman

Chief

Head

of

the

Department

of

Health

Services

Arizona

State

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Arizona

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Thank you very much! Let me know if you have any questions.

Gabee

--

Gabriella Lepore | Office of Arizona Governor Doug Ducey
Deputy Director, Boards and Commissions

G. 602.540.1055

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www.azgovernor.gov



--

Patricia McSorley

Executive Director

Arizona Medical Board

Arizona Regulatory Board of

Physician Assistants

--

Gabriella Lepore | **Office of Arizona Governor Doug Ducey**
Deputy Director, Boards and Commissions

g.lepore@azgovernor.gov

www.azgovernor.gov



From: [Kimberly Scoplitte](#) on behalf of [Kimberly Scoplitte <kscoplitte@azboc.gov>](#)
To: [Trista Guzman Glover](#)
Cc: [Theresa Bunch](#); [Irma Telles](#); [Rosa Rodriguez](#); [Mini Ahmetovic](#)
Subject: Re: Universal Recognition Application
Date: Wednesday, December 9, 2020 1:57:56 PM

Good afternoon Trista,

Regarding the above matter, you had asked us to keep you informed regarding this matter and this is what we know to date . The individual has not contacted the Board since they applied back in September. A letter was generated and mailed out to the individual regarding the missing certification letter and there has been no change on her account since then nor has Board staff heard from the individual.

We will continue to keep you updated on this.

Sincerely,

Kimberly Scoplitte
Executive Director
Arizona State Board of Cosmetology
1740 W. Adams
Phoenix, AZ 85007
Phone: (602) 974-2000
kscoplitte@azboc.gov

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Trista

Trista Guzman Glover | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions
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Arizona State Board of Cosmetology
1740 W. Adams
Phoenix, AZ 85007
Phone: 480-784-4632
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Trista Guzman Glover | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions

www.azgovernor.gov



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Kimberly Scoplitte
Executive Director
Arizona State Board of Cosmetology
1740 W. Adams
Phoenix, AZ 85007

kscoplitte@azboc.gov

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From: [Trista Guzman Glover](#) on behalf of [Trista Guzman Glover <tguzman@az.gov>](#)
To: [Kimberly Scoplitte](#)
Cc: [Irma Telles](#); [Mini Ahmetovic](#); [Rosa Rodriguez](#); [Theresa Bunch](#)
Subject: Re: Universal Recognition Application
Date: Wednesday, December 9, 2020 2:06:00 PM

Thanks, Kim.
Trista

On Wed, Dec 9, 2020 at 1:57 PM Kimberly Scoplitte <kscoplitte@azboc.gov> wrote:
Good afternoon Trista,

Regarding the above matter, you had asked us to keep you informed regarding this matter and this is what we know to date . The individual has not contacted the Board since they applied back in September. A letter was generated and mailed out to the individual regarding the missing certification letter and there has been no change on her account since then nor has Board staff heard from the individual.

We will continue to keep you updated on this.

Sincerely,

Kimberly Scoplitte
Executive Director
Arizona State Board of Cosmetology
[1740 W. Adams](#)
[Phoenix, AZ 85007](#)
kscoplitte@azboc.gov

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Trista Guzman Glover | **Office of Arizona Governor Doug Ducey**
Director, Boards and Commissions
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Sincerely,

Kimberly Scoplitte
Executive Director
Arizona State Board of Cosmetology
[1740 W. Adams](https://www.azboc.gov)
[Phoenix, AZ 85007](https://www.azboc.gov)
Phone: (602) 709-1100
kscoplitte@azboc.gov

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Trista

Trista Guzman Glover | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions

www.azgovernor.gov



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Thank you.
Kimberly Scoplitte
Executive Director
Arizona State Board of Cosmetology

[1740 W. Adams](#)
[Phoenix, AZ 85007](#)
Phone: (602) 944-1100
kscopierre@azboc.gov

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--

Trista Guzman Glover | **Office of Arizona Governor Doug Ducey**
Director, Boards and Commissions

www.azgovernor.gov



From: [Kimberly Scoplitte](#) on behalf of [Kimberly Scoplitte <kscoplitte@azboc.gov>](#)
To: [Trista Guzman Glover](#)
Subject: Re: Universal Recognition Application
Date: Wednesday, December 9, 2020 2:16:14 PM

You're very welcome.

Kimberly Scoplitte
Executive Director
Arizona State Board of Cosmetology
1740 W. Adams
Phoenix, AZ 85007
Phone: 480-731-1100
kscoplitte@azboc.gov

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Phone: 480-731-1100
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Trista Guzman Glover | Office of Arizona Governor Doug Ducey

Director, Boards and Commissions

www.azgovernor.gov



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Executive Director
Arizona State Board of Cosmetology
[1740 W. Adams](#)
[Phoenix, AZ 85007](#)
kscoplitte@azboc.gov

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Trista

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(A) A person shall not:

(1) Perform or attempt to perform cosmetology, aesthetics, nail technology or hairstyling without a license in that category issued pursuant to this chapter, or practice in a category in which the person does not hold a license.

(2) Display a sign or in any way advertise or hold oneself out as a cosmetologist, aesthetician, nail technician or hairstylist or as being engaged in the practice or business of cosmetology, aesthetics, nail technician or hairstyling without being licensed pursuant to this chapter.

Please advise as to whether the Board can proceed with the denial process.

Thank you.

Kimberly Scoplitte

Executive Director

Arizona State Board of Cosmetology

[1740 W. Adams](#)

[Phoenix, AZ 85007](#)

[Phone: 602.962.1100](#)

kscoplitte@azboc.gov

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--

Trista Guzman Glover | **Office of Arizona Governor Doug Ducey**

Director, Boards and Commissions

1111 North Central Expressway

www.azgovernor.gov

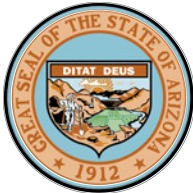


From: [Tobi Zavala](#) on behalf of [Tobi Zavala <tobi.zavala@azbbhe.us>](mailto:tobi.zavala@azbbhe.us)
To: [Trista Guzman Glover](#)
Subject: Request pursuant to EO 2020-02
Date: Friday, January 22, 2021 11:07:17 AM

Pursuant to EO 2020-02 I request approval for our Board to deny Mr. Jayme Helgeson licensure under Universal Recognition. The applicant does not meet the Universal License requirement pursuant to A.R.S. § 32-4302 (A)(1) because he is not currently licensed in another state in the discipline applied for and at the same practice level as determined by the regulating entity because his masters in counseling is not from a regionally accredited college or university.

Please let me know if you need additional information.

Tobi Zavala, Executive Director



ARIZONA BOARD OF BEHAVIORAL HEALTH EXAMINERS
1740 W. Adams Street, Suite 3600, Phoenix, AZ 85007
Phone: (602) 964-2311 Fax: 602-364-0890
Email: tobi.zavala@azbbhe.us
Board Website: www.azbbhe.us

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From: [Trista Guzman Glover](#) on behalf of [Trista Guzman Glover <tguzman@az.gov>](#)
To: [Tobi Zavala](#)
Subject: Re: Request pursuant to EO 2020-02
Date: Monday, January 25, 2021 9:33:42 AM

Thanks, Tobi. Approval to move forward with denial.

Trista

Trista Guzman Glover | **Office of Arizona Governor Doug Ducey**
Director, Boards and Commissions
P (602) 542-1000
www.azgovernor.gov

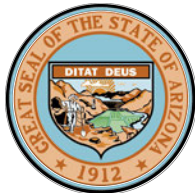


On Fri, Jan 22, 2021 at 11:07 AM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:

Pursuant to EO 2020-02 I request approval for our Board to deny Mr. Jayme Helgeson licensure under Universal Recognition. The applicant does not meet the Universal License requirement pursuant to A.R.S. § 32-4302 (A)(1) because he is not currently licensed in another state in the discipline applied for and at the same practice level as determined by the regulating entity because his masters in counseling is not from a regionally accredited college or university.

Please let me know if you need additional information.

Tobi Zavala, Executive Director



ARIZONA BOARD OF BEHAVIORAL HEALTH EXAMINERS
1740 W. Adams Street, Suite 3600, Phoenix, AZ 85007
Phone: [602-364-8887](tel:602-364-8887) Fax: 602-364-0890
Email: tobi.zavala@azbbhe.us
Board Website: www.azbbhe.us

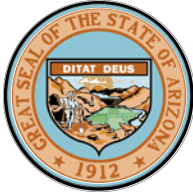
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From: [Tobi Zavala](#) on behalf of [Tobi Zavala <tobi.zavala@azbbhe.us>](mailto:tobi.zavala@azbbhe.us)
To: [Trista Guzman Glover](#)
Subject: Re: Request pursuant to EO 2020-02
Date: Monday, January 25, 2021 9:52:10 AM

Thank you.

Tobi Zavala, Executive Director



ARIZONA BOARD OF BEHAVIORAL HEALTH EXAMINERS
1740 W. Adams Street, Suite 3600, Phoenix, AZ 85007
Phone: [602-542-1630](tel:602-542-1630) Fax: [602-364-0890](tel:602-364-0890)
Email: tobi.zavala@azbbhe.us
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On Mon, Jan 25, 2021 at 9:33 AM Trista Guzman Glover <tguzman@az.gov> wrote:
Thanks, Tobi. Approval to move forward with denial.

Trista

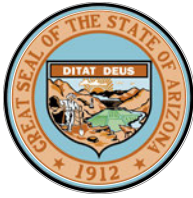
Trista Guzman Glover | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions
600 North Central Avenue
www.azgovernor.gov



On Fri, Jan 22, 2021 at 11:07 AM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:
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Please let me know if you need additional information.

Tobi Zavala, Executive Director



ARIZONA BOARD OF BEHAVIORAL HEALTH EXAMINERS

1740 W. Adams Street, Suite 3600, Phoenix, AZ 85007

Phone: [602-364-0890](tel:602-364-0890) Fax: 602-364-0890

Email: tobi.zavala@azbbhe.us

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From: [Tobi Zavala](#) on behalf of [Tobi Zavala <tobi.zavala@azbbhe.us>](mailto:tobi.zavala@azbbhe.us)
To: [Trista Guzman Glover](#)
Subject: Clarification on Request Pursuant to EO 2020-02
Date: Monday, January 25, 2021 10:58:13 AM

After receiving your approval it was pointed out to me by one of my staff that my choice of verbiage may have been unintentionally misleading so I would like to clarify my request for Mr. Helgeson.

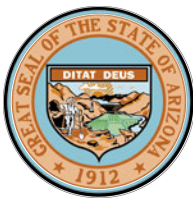
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Tobi Zavala, Executive Director



ARIZONA BOARD OF BEHAVIORAL HEALTH EXAMINERS
1740 W. Adams Street, Suite 3600, Phoenix, AZ 85007
Phone: [602-364-6667](tel:602-364-6667) Fax: [602-364-0890](tel:602-364-0890)
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From: [Tobi Zavala](#) on behalf of [Tobi Zavala <tobi.zavala@azbbhe.us>](mailto:tobi.zavala@azbbhe.us)
To: [Trista Guzman Glover](#)
Subject: Re: Clarification on Request Pursuant to EO 2020-02
Date: Tuesday, January 26, 2021 2:15:35 PM

Following up to confirm your approval.

Tobi Zavala, Executive Director



ARIZONA BOARD OF BEHAVIORAL HEALTH EXAMINERS
1740 W. Adams Street, Suite 3600, Phoenix, AZ 85007
Phone: [602-364-0890](tel:602-364-0890) Fax: [602-364-0890](tel:602-364-0890)
Email: tobi.zavala@azbbhe.us
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On Mon, Jan 25, 2021 at 10:57 AM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:

After receiving your approval it was pointed out to me by one of my staff that my choice of verbiage may have been unintentionally misleading so I would like to clarify my request for Mr. Helgeson.

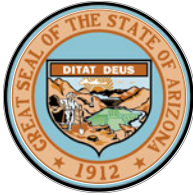
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Tobi Zavala, Executive Director



ARIZONA BOARD OF BEHAVIORAL HEALTH EXAMINERS

1740 W. Adams Street, Suite 3600, Phoenix, AZ 85007

Phone: [602-364-0890](tel:602-364-0890) Fax: 602-364-0890

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From: [Trista Guzman Glover](#) on behalf of [Trista Guzman Glover <tguzman@az.gov>](#)
To: [Tobi Zavala](#)
Subject: Re: Clarification on Request Pursuant to EO 2020-02
Date: Wednesday, January 27, 2021 3:55:25 PM

Good Afternoon, Tobi –

Thank you for the clarification. ARS 32-4302(A)(3) only requires that an applicant met the other state’s minimum education and other requirements at the time of licensure; so as long as Mr. Hegelson met the other state’s licensing requirements, he is entitled to a universal license in Arizona provided he meets all other requirements in ARS 32-4302.

Additionally, with regard to ARS 32-4302(A)(1) and same practice level, that provision applies to whether an individual was licensed to practice the same level of care in the other state as they are seeking to practice in Arizona (example: a dentist administering general anesthesia).

The request to deny Mr. Hegelson a universal license is denied.

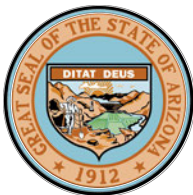
Please let me know if you have any questions.
Trista

Trista Guzman Glover | **Office of Arizona Governor Doug Ducey**
Director, Boards and Commissions
700 Washington Blvd, Phoenix, AZ 85003
www.azgovernor.gov



On Tue, Jan 26, 2021 at 2:15 PM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:
Following up to confirm your approval.

Tobi Zavala, Executive Director



ARIZONA BOARD OF BEHAVIORAL HEALTH EXAMINERS
1740 W. Adams Street, Suite 3600, Phoenix, AZ 85007
Phone: [602-364-0890](tel:602-364-0890) Fax: 602-364-0890
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On Mon, Jan 25, 2021 at 10:57 AM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:

After receiving your approval it was pointed out to me by one of my staff that my choice of verbiage may have been unintentionally misleading so I would like to clarify my request for Mr. Helgeson.

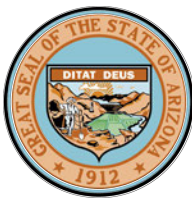
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Tobi Zavala, Executive Director



ARIZONA BOARD OF BEHAVIORAL HEALTH EXAMINERS

1740 W. Adams Street, Suite 3600, Phoenix, AZ 85007

Phone: [602-530-7111](tel:602-530-7111) Fax: [602-364-0890](tel:602-364-0890)

Email: tobi.zavala@azbbhe.us

Board Website: www.azbbhe.us

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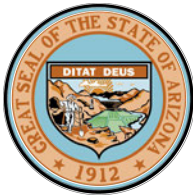
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From: [Tobi Zavala](#) on behalf of [Tobi Zavala <tobi.zavala@azbbhe.us>](#)
To: [Trista Guzman Glover](#)
Subject: Re: Clarification on Request Pursuant to EO 2020-02
Date: Wednesday, January 27, 2021 4:13:31 PM

I respectfully ask you to reconsider. Our Board has determined that the same practice level is a master degree from a regionally accredited institution. This would be the same requirement for any of our licenses as well as our own very robust endorsement license which is separate from UR. A.R.S. § 32-3274(B) is clear and unambiguous regarding the educational requirements for licensure in that the applicant “**must** have earned a master’s or higher degree in the applicable field of practice **granted by a regionally accredited college or university.**” ARS 32-3274, Licensure by Endorsement, they would not meet the educational requirements and would be denied. I do not believe that the laws are intended to have disparate results.

In the 2020 calendar year we issued 661 licenses by endorsement (3 years licensed in another state) and 264 UR (1 year licensed in another state).

Tobi Zavala, Executive Director



ARIZONA BOARD OF BEHAVIORAL HEALTH EXAMINERS
1740 W. Adams Street, Suite 3600, Phoenix, AZ 85007
Phone: [602-364-0890](tel:602-364-0890); Fax: 602-364-0890
Email: tobi.zavala@azbbhe.us
Board Website: www.azbbhe.us

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On Wed, Jan 27, 2021 at 3:55 PM Trista Guzman Glover <tguzman@az.gov> wrote:

Good Afternoon, Tobi –

Thank you for the clarification. ARS 32-4302(A)(3) only requires that an applicant met the other state’s minimum education and other requirements at the time of licensure; so as long as Mr. Hegelson met the other state’s licensing requirements, he is entitled to a universal license in Arizona provided he meets all other requirements in ARS 32-4302.

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anesthesia).

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Please let me know if you have any questions.

Trista

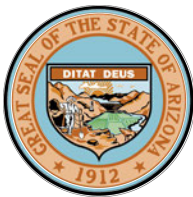
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Director, Boards and Commissions

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On Tue, Jan 26, 2021 at 2:15 PM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:
Following up to confirm your approval.

Tobi Zavala, Executive Director



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1740 W. Adams Street, Suite 3600, Phoenix, AZ 85007
Phone: [602-364-0890](tel:602-364-0890) Fax: 602-364-0890
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On Mon, Jan 25, 2021 at 10:57 AM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:

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Request:

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Tobi Zavala, Executive Director



ARIZONA BOARD OF BEHAVIORAL HEALTH EXAMINERS

1740 W. Adams Street, Suite 3600, Phoenix, AZ 85007

Phone: [602-542-1611](tel:602-542-1611) Fax: 602-364-0890

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From: [Trista Guzman Glover](#) on behalf of [Trista Guzman Glover <tguzman@az.gov>](#)
To: [Tobi Zavala](#)
Subject: Re: Clarification on Request Pursuant to EO 2020-02
Date: Thursday, January 28, 2021 1:49:36 PM

Tobi -

I believe that back in July 2019, all boards received a memo from the AG's office regarding the universal recognition statute. In that memo, the AG's office has interpreted the universal recognition statute in the same manner. Specifically, the AG's Office states that for A.R.S. 32-4302(A)(3), "the out-of-state licensee must meet educational and any work experience and clinical supervision requirements *that were required at the time of licensure...*"

Trista

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Director, Boards and Commissions
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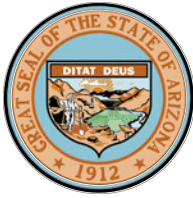
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ARIZONA BOARD OF BEHAVIORAL HEALTH EXAMINERS
1740 W. Adams Street, Suite 3600, Phoenix, AZ 85007
Phone: [602-364-0890](tel:602-364-0890) Fax: 602-364-0890
Email: tobi.zavala@azbbhe.us
Board Website: www.azbbhe.us



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Trista

Trista Guzman Glover | Office of Arizona Governor Doug Ducey
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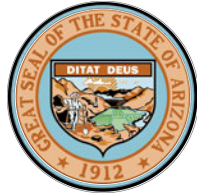
www.azgovernor.gov



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ARIZONA BOARD OF BEHAVIORAL HEALTH EXAMINERS
1740 W. Adams Street, Suite 3600, Phoenix, AZ 85007
Phone: 602-364-1617 Fax: 602-364-0890
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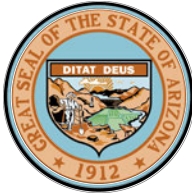
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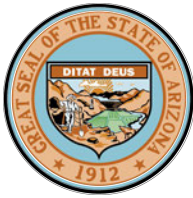
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From: [Tobi Zavala](#) on behalf of [Tobi Zavala <tobi.zavala@azbbhe.us>](#)
To: [Trista Guzman Glover](#)
Subject: Re: Clarification on Request Pursuant to EO 2020-02
Date: Thursday, January 28, 2021 2:14:19 PM

Can we please discuss this. Please

see: https://www.azbbhe.us/sps_pdfs/Universal%20Recognition%20requirements%202019-01.pdf

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Trista

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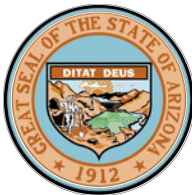


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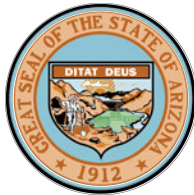
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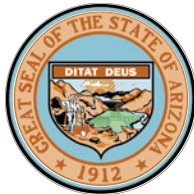
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From: [Trista Guzman Glover](#) on behalf of [Trista Guzman Glover <tguzman@az.gov>](#)
To: [Tobi Zavala](#)
Subject: Re: Clarification on Request Pursuant to EO 2020-02
Date: Thursday, January 28, 2021 2:58:36 PM

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Trista Guzman Glover | Office of Arizona Governor Doug Ducey
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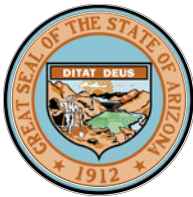


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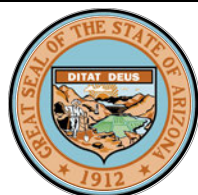


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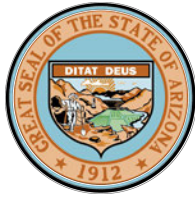
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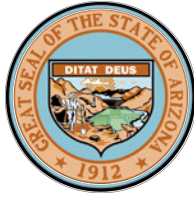
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To: [Trista Guzman Glover](#)
Subject: Re: Clarification on Request Pursuant to EO 2020-02
Date: Thursday, January 28, 2021 3:08:26 PM

Can we please discuss this? It is not the same level of practice as determined by our Board. Our Board has issued some of the highest numbers of UR as we support what UR means. A nationally accredited school is not the same level as determined by our Board. With that said, we have denied before EO and have strongly shared that this was a requirement along the way. This decision would have a chilling effect on so many past decisions. The state of Az does not want our behavioral health practitioners being licensed from a non-regionally accredited school.

Tobi Zavala, Executive Director



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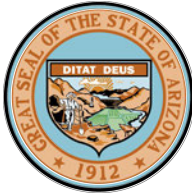


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Email: tobi.zavala@azbbhe.us

Board Website: www.azbbhe.us

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Tobi -

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Trista

Trista Guzman Glover | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions

www.azgovernor.gov

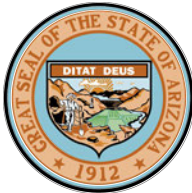


On Wed, Jan 27, 2021 at 4:13 PM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:

I respectfully ask you to reconsider. Our Board has determined that the same practice level is a master degree from a regionally accredited institution. This would be the same requirement for any of our licenses as well as our own very robust endorsement license which is separate from UR. A.R.S. § 32-3274(B) is clear and unambiguous regarding the educational requirements for licensure in that the applicant **“must have earned a master’s or higher degree in the applicable field of practice granted by a regionally accredited college or university.”** ARS 32-3274, Licensure by Endorsement, they would not meet the educational requirements and would be denied. I do not believe that the laws are intended to have disparate results.

In the 2020 calendar year we issued 661 licenses by endorsement (3 years licensed in another state) and 264 UR (1 year licensed in another state).

Tobi Zavala, Executive Director



ARIZONA BOARD OF BEHAVIORAL HEALTH EXAMINERS
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Board Website: www.azbbhe.us

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he is entitled to a universal license in Arizona provided he meets all other requirements in ARS 32-4302.

Additionally, with regard to ARS 32-4302(A)(1) and same practice level, that provision applies to whether an individual was licensed to practice the same level of care in the other state as they are seeking to practice in Arizona (example: a dentist administering general anesthesia).

The request to deny Mr. Hegelson a universal license is denied.

Please let me know if you have any questions.

Trista

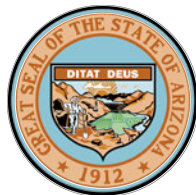
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Director, Boards and Commissions

www.azgovernor.gov



On Tue, Jan 26, 2021 at 2:15 PM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:
Following up to confirm your approval.

Tobi Zavala, Executive Director



ARIZONA BOARD OF BEHAVIORAL HEALTH EXAMINERS
1740 W. Adams Street, Suite 3600, Phoenix, AZ 85007
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On Mon, Jan 25, 2021 at 10:57 AM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:
After receiving your approval it was pointed out to me by one of my staff that

my choice of verbiage may have been unintentionally misleading so I would like to clarify my request for Mr. Helgeson.

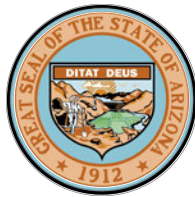
Request:

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Clarification:

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Tobi Zavala, Executive Director



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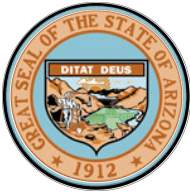
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From: [Tobi Zavala](#) on behalf of [Tobi Zavala <tobi.zavala@azbbhe.us>](#)
To: [Trista Guzman Glover](#)
Subject: Re: Clarification on Request Pursuant to EO 2020-02
Date: Tuesday, February 2, 2021 8:33:55 AM

Good morning Trista,

Thank you for your time on Friday. I want to circle back on this. I was transparent in this whole process because our Board has some of the highest numbers in issuing UR licenses. It's our understanding you want the same qualified individuals in Arizona as else well. It was always our understanding that the practice level would be determined by the Board. Our Board determines the same practice level to be a Master's from a regionally accredited university. If it was a bachelor's from a regionally accredited it too would be denied. Please vet this further with Emily and allow me to be part of that process. Thank you in advance.

Tobi Zavala, Executive Director



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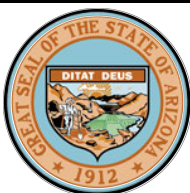
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On Thu, Jan 28, 2021 at 3:07 PM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:

Can we please discuss this? It is not the same level of practice as determined by our Board. Our Board has issued some of the highest numbers of UR as we support what UR means. A nationally accredited school is not the same level as determined by our Board. With that said, we have denied before EO and have strongly shared that this was a requirement along the way. This decision would have a chilling effect on so many past decisions. The state of AZ does not want our behavioral health practitioners being licensed from a non-regionally accredited school.

Tobi Zavala, Executive Director



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Trista

Trista Guzman Glover | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions

602-542-1138
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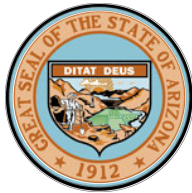


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see: https://www.azbbhe.us/sps_pdfs/Universal%20Recognition%20requirements%202019-01.pdf

Tobi Zavala, Executive Director



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1740 W. Adams Street, Suite 3600, Phoenix, AZ 85007
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1740 W. Adams Street, Suite 3600, Phoenix, AZ 85007



Phone: 602-364-0890 Fax: 602-364-0890

Email: tobi.zavala@azbbhe.us

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The request to deny Mr. Hegelson a universal license is denied.

Please let me know if you have any questions.
Trista

Trista Guzman Glover | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions

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Tobi Zavala, Executive Director



ARIZONA BOARD OF BEHAVIORAL HEALTH EXAMINERS

1740 W. Adams Street, Suite 3600, Phoenix, AZ 85007

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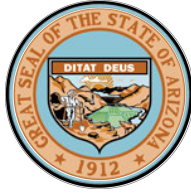
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Tobi Zavala, Executive Director



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From: [Trista Guzman Glover](#) on behalf of [Trista Guzman Glover <tguzman@az.gov>](#)
To: [Tobi Zavala](#)
Subject: Re: Clarification on Request Pursuant to EO 2020-02
Date: Friday, February 5, 2021 2:22:24 PM

Hi, Tobi -

Thanks again for the robust conversation around this issue. I've gone back through Emily's inbox and notes and spoken to her as well. We cannot find any information about the substantive policy statement and Emily does not recall seeing it.

Our office stands by the denial to deny Mr. Helgeson a license under universal recognition. He should be granted a license under universal recognition because he met requirements of licensure from the original state of licensure at the time of licensure.

Trista

Trista Guzman Glover | Office of Arizona Governor Doug Ducey

Director, Boards and Commissions

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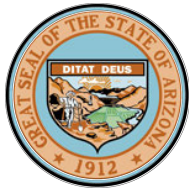


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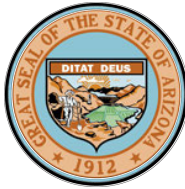
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Tobi Zavala, Executive Director



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Trista

Trista Guzman Glover | Office of Arizona Governor Doug Ducey

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602.974.4400

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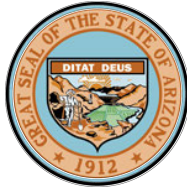


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Tobi Zavala, Executive Director



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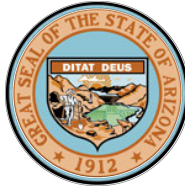


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In the 2020 calendar year we issued 661 licenses by endorsement (3 years licensed in another state) and 264 UR (1 year licensed in another state).

Tobi Zavala, Executive Director



ARIZONA BOARD OF BEHAVIORAL HEALTH EXAMINERS
1740 W. Adams Street, Suite 3600, Phoenix, AZ 85007
Phone: [602-542-1177](tel:602-542-1177) Fax: [602-364-0890](tel:602-364-0890)
Email: tobi.zavala@azbbhe.us
Board Website: www.azbbhe.us

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Additionally, with regard to ARS 32-4302(A)(1) and same practice level, that provision applies to whether an individual was licensed to practice the same level of care in the other state as they are seeking to practice in Arizona (example: a dentist administering general anesthesia).

The request to deny Mr. Hegelson a universal license is denied.

Please let me know if you have any questions.
Trista

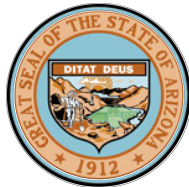
Trista Guzman Glover | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions

www.azgovernor.gov



On Tue, Jan 26, 2021 at 2:15 PM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:
Following up to confirm your approval.

Tobi Zavala, Executive Director



ARIZONA BOARD OF BEHAVIORAL HEALTH EXAMINERS
1740 W. Adams Street, Suite 3600, Phoenix, AZ 85007
Phone: 602-512-1117 Fax: 602-364-0890
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After receiving your approval it was pointed out to me by one of my staff that my choice of verbiage may have been unintentionally misleading so I would like to clarify my request for Mr. Helgeson.

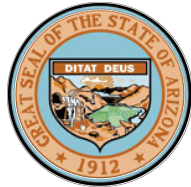
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1740 W. Adams Street, Suite 3600, Phoenix, AZ 85007

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Board Website: www.azbbhe.us

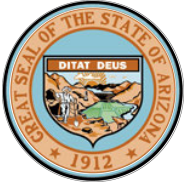
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From: [Tobi Zavala](#) on behalf of [Tobi Zavala <tobi.zavala@azbbhe.us>](mailto:tobi.zavala@azbbhe.us)
To: [Trista Guzman Glover](#)
Subject: Re: Clarification on Request Pursuant to EO 2020-02
Date: Friday, February 5, 2021 2:25:29 PM

To clarify, we will be licensing individuals with an associate degree and bachelor's degree moving forward. Scary for the people of Arizona.

Tobi Zavala, Executive Director



ARIZONA BOARD OF BEHAVIORAL HEALTH EXAMINERS
1740 W. Adams Street, Suite 3600, Phoenix, AZ 85007
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Trista

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Director, Boards and Commissions

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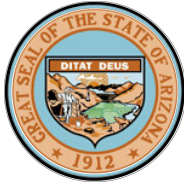


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Good morning Trista,

Thank you for your time on Friday. I want to circle back on this. I was transparent in this whole process because our Board has some of the highest numbers in issuing UR licenses. It's our understanding you want the same qualified individuals in Arizona as else well. It was always our understanding that the practice level would be determined by the Board. Our Board determines the same practice level to be a Master's from a regionally accredited university. If it was a bachelor's from a regionally accredited it too would be denied. Please vet this further with Emily and allow me to be part of that process. Thank you in advance.

Tobi Zavala, Executive Director



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Tobi Zavala, Executive Director



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Tobi -

Universal recognition and licensure by endorsement are two separate paths to licensure. These are not the same path to licensure. As such, each should follow the list of requirements outlined in statute.

Trista

Trista Guzman Glover | Office of Arizona Governor Doug Ducey

Director, Boards and Commissions

500 Washington Street, Suite 1000

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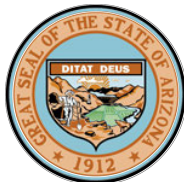


On Thu, Jan 28, 2021 at 2:14 PM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:

Can we please discuss this. Please

see: https://www.azbbhe.us/sps_pdfs/Universal%20Recognition%20requirements%202019-01.pdf

Tobi Zavala, Executive Director



ARIZONA BOARD OF BEHAVIORAL HEALTH EXAMINERS

1740 W. Adams Street, Suite 3600, Phoenix, AZ 85007

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On Thu, Jan 28, 2021 at 1:49 PM Trista Guzman Glover <tguzman@az.gov> wrote:
Tobi -

I believe that back in July 2019, all boards received a memo from the AG's office regarding the universal recognition statute. In that memo, the AG's office has interpreted the universal recognition statute in the same manner. Specifically, the AG's Office states that for A.R.S. 32-4302(A)(3), "the out-of-state licensee must meet educational and any work experience and clinical supervision requirements *that were required at the time of licensure...*"

Trista

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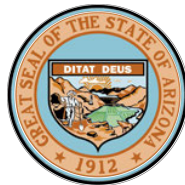


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Please let me know if you have any questions.
Trista

Trista Guzman Glover | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions

602-364-8900
www.azgovernor.gov



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Tobi Zavala, Executive Director



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1740 W. Adams Street, Suite 3600, Phoenix, AZ 85007
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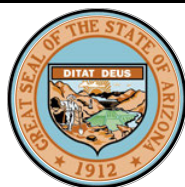
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ARIZONA BOARD OF BEHAVIORAL HEALTH EXAMINERS

1740 W. Adams Street, Suite 3600, Phoenix, AZ 85007

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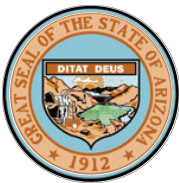
From: [Tobi Zavala](#) on behalf of [Tobi Zavala <tobi.zavala@azbbhe.us>](mailto:Tobi.Zavala@azbbhe.us)
To: [Trista Guzman Glover](#)
Subject: Re: Clarification on Request Pursuant to EO 2020-02
Date: Friday, February 5, 2021 4:08:44 PM

In all due respect, who else do I need to speak with. This is the way the board has been handling since August 2019 I'm not sure how we would start opening it up to non qualified individuals at different practice levels determined by our board. This makes no sense and it's controversial to the way we have been doing it for a year and a half.

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To clarify, we will be licensing individuals with an associate degree and bachelor's degree moving forward. Scary for the people of Arizona.

Tobi Zavala, Executive Director



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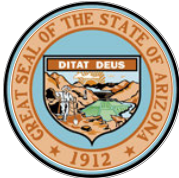


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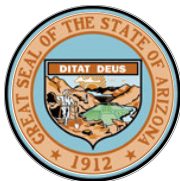
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Trista Guzman Glover | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions

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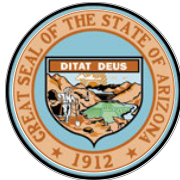


On Thu, Jan 28, 2021 at 2:14 PM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:

Can we please discuss this. Please

see: https://www.azbbhe.us/sps_pdfs/Universal%20Recognition%20requirements%202019-01.pdf

Tobi Zavala, Executive Director



ARIZONA BOARD OF BEHAVIORAL HEALTH EXAMINERS
1740 W. Adams Street, Suite 3600, Phoenix, AZ 85007
Phone: 602-364-0890 Fax: 602-364-0890
Email: tobi.zavala@azbbhe.us
Board Website: www.azbbhe.us

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On Thu, Jan 28, 2021 at 1:49 PM Trista Guzman Glover <tguzman@az.gov> wrote:
Tobi -

I believe that back in July 2019, all boards received a memo from the AG's office regarding the universal recognition statute. In that memo, the AG's office has interpreted the universal recognition statute in the same manner. Specifically, the AG's Office states that for A.R.S. 32-4302(A)(3), "the out-of-state licensee must meet educational and any work experience and clinical supervision requirements *that were required at the time of licensure...*"

Trista

Trista Guzman Glover | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions

www.azgovernor.gov

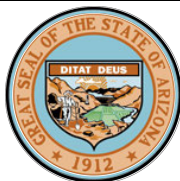


On Wed, Jan 27, 2021 at 4:13 PM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:

I respectfully ask you to reconsider. Our Board has determined that the same practice level is a master degree from a regionally accredited institution. This would be the same requirement for any of our licenses as well as our own very robust endorsement license which is separate from UR. A.R.S. § 32-3274(B) is clear and unambiguous regarding the educational requirements for licensure in that the applicant "**must** have earned a master's or higher degree in the applicable field of practice **granted by a regionally accredited college or university.**" ARS 32-3274, Licensure by Endorsement, they would not meet the educational requirements and would be denied. I do not believe that the laws are intended to have disparate results.

In the 2020 calendar year we issued 661 licenses by endorsement (3 years licensed in another state) and 264 UR (1 year licensed in another state).

Tobi Zavala, Executive Director



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Additionally, with regard to ARS 32-4302(A)(1) and same practice level, that provision applies to whether an individual was licensed to practice the same level of care in the other state as they are seeking to practice in Arizona (example: a dentist administering general anesthesia).

The request to deny Mr. Hegelson a universal license is denied.

Please let me know if you have any questions.
Trista

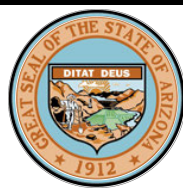
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On Tue, Jan 26, 2021 at 2:15 PM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:
Following up to confirm your approval.

Tobi Zavala, Executive Director



ARIZONA BOARD OF BEHAVIORAL HEALTH EXAMINERS
1740 W. Adams Street, Suite 3600, Phoenix, AZ 85007
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On Mon, Jan 25, 2021 at 10:57 AM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:
After receiving your approval it was pointed out to me by one of my staff that my choice of verbiage may have been unintentionally misleading so I would like to clarify my request for Mr. Helgeson.

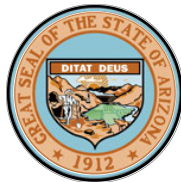
Request:

Pursuant to EO 2020-02 I request approval for our Board to deny Mr. Jayme Helgeson licensure under Universal Recognition. The applicant does not meet the Universal License requirement pursuant to A.R.S. § 32-4302 (A)(1) because he is not currently licensed in another state in the discipline applied for and at the same practice level as determined by the regulating entity because his masters in counseling is not from a regionally accredited college or university.

Clarification:

Pursuant to EO 2020-02 I request approval for our Board to deny Mr. Jayme Helgeson licensure under Universal Recognition. The applicant does not meet the Universal License requirement pursuant to A.R.S. § 32-4302 (A)(1) He does have a license in another state in the discipline applied for but that license is not determined to be at the same practice level as determined by the regulating entity because his masters in counseling is not from a regionally accredited college or university.

Tobi Zavala, Executive Director



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Tobi Zavala, Executive Director



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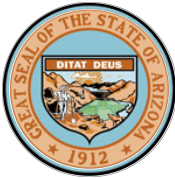
From: [Tobi Zavala](#) on behalf of [Tobi Zavala <tobi.zavala@azbbhe.us>](#)
To: [Trista Guzman Glover](#)
Subject: Re: Clarification on Request Pursuant to EO 2020-02
Date: Tuesday, February 9, 2021 6:15:13 AM

Trista,

I am meeting with the AG's office this morning. I have so many concerns about this concerning the decision. Again, who can I speak with this regarding this?

I had always heard that we were called the "vending machine state" put a quarter in and pick a license. I have defended that as it appeared decisions were being made to protect the public. If I had a kiddo that was cutting himself or worse I would sure like them to be treated by someone with a degree who has been trained and educated.

Tobi Zavala, Executive Director



ARIZONA BOARD OF BEHAVIORAL HEALTH EXAMINERS
1740 W. Adams Street, Suite 3600, Phoenix, AZ 85007
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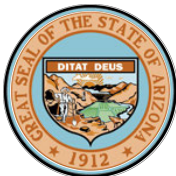
On Fri, Feb 5, 2021 at 4:08 PM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:

In all due respect, who else do I need to speak with. This is the way the board has been handling since August 2019 I'm not sure how we would start opening it up to non qualified individuals at different practice levels determined by our board. This makes no sense and it's controversial to the way we have been doing it for a year and a half.

On Fri, Feb 5, 2021 at 2:24 PM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:

To clarify, we will be licensing individuals with an associate degree and bachelor's degree moving forward. Scary for the people of Arizona.

Tobi Zavala, Executive Director



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On Fri, Feb 5, 2021 at 2:22 PM Trista Guzman Glover <tguzman@az.gov> wrote:

Hi, Tobi -

Thanks again for the robust conversation around this issue. I've gone back through Emily's inbox and notes and spoken to her as well. We cannot find any information about the substantive policy statement and Emily does not recall seeing it.

Our office stands by the denial to deny Mr. Helgeson a license under universal recognition. He should be granted a license under universal recognition because he met requirements of licensure from the original state of licensure at the time of licensure.

Trista

Trista Guzman Glover | Office of Arizona Governor Doug Ducey
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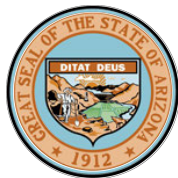


On Tue, Feb 2, 2021 at 8:33 AM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:

Good morning Trista,

Thank you for your time on Friday. I want to circle back on this. I was transparent in this whole process because our Board has some of the highest numbers in issuing UR licenses. It's our understanding you want the same qualified individuals in Arizona as else well. It was always our understanding that the practice level would be determined by the Board. Our Board determines the same practice level to be a Master's from a regionally accredited university. If it was a bachelor's from a regionally accredited it too would be denied. Please vet this further with Emily and allow me to be part of that process. Thank you in advance.

Tobi Zavala, Executive Director



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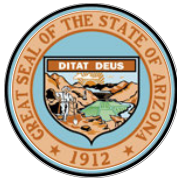
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On Thu, Jan 28, 2021 at 3:07 PM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:

Can we please discuss this? It is not the same level of practice as determined by our Board. Our Board has issued some of the highest numbers of UR as we support what UR means. A nationally accredited school is not the same level as determined by our Board. With that said, we have denied before EO and have strongly shared that this was a requirement along the way. This decision would have a chilling effect on so many past decisions. The state of AZ does not want our behavioral health practitioners being licensed from a non-regionally accredited school.

Tobi Zavala, Executive Director



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On Thu, Jan 28, 2021 at 2:58 PM Trista Guzman Glover <tguzman@az.gov> wrote:

Tobi -

Universal recognition and licensure by endorsement are two separate paths to licensure. These are not the same path to licensure. As such, each should follow the list of requirements outlined in statute.

Trista

Trista Guzman Glover | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions

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Tobi Zavala, Executive Director



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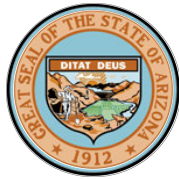
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Please let me know if you have any questions.
Trista

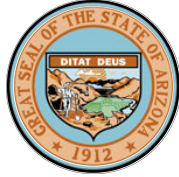
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Tobi Zavala, Executive Director



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Request:

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Clarification:

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Tobi Zavala, Executive Director



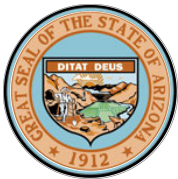
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From: [Trista Guzman Glover](#) on behalf of [Trista Guzman Glover <tguzman@az.gov>](#)
To: [Tobi Zavala](#)
Subject: Re: Clarification on Request Pursuant to EO 2020-02
Date: Tuesday, February 9, 2021 9:21:13 AM

Tobi -

I've spoken with the appropriate individuals within the Governor's Office. Our decision remains the same. To reiterate:

- ARS 32-4302(A)(3) only requires that an applicant met the other state's minimum education and other requirements at the time of licensure; so as long as Mr. Hegelson met the other state's licensing requirements, he is entitled to a universal license in Arizona provided he meets all other requirements in ARS 32-4302.
- With regard to ARS 32-4302(A)(1) and same practice level, that provision applies to whether an individual was licensed to practice the same level of care in the other state as they are seeking to practice in Arizona (example: a dentist administering general anesthesia).

Trista

Trista Guzman Glover | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions
trista.guzman@az.gov
www.azgovernor.gov



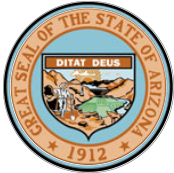
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Tobi Zavala, Executive Director



ARIZONA BOARD OF BEHAVIORAL HEALTH EXAMINERS
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Board Website: www.azbbhe.us

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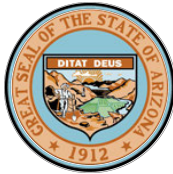
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Trista

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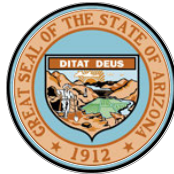
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Tobi Zavala, Executive Director



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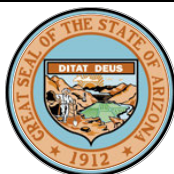
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On Thu, Jan 28, 2021 at 2:58 PM Trista Guzman Glover <tguzman@az.gov> wrote:

Tobi -

Universal recognition and licensure by endorsement are two separate paths to licensure. These are not the same path to licensure. As such, each should follow the list of requirements outlined in statute.

Trista

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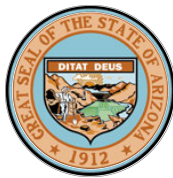


On Thu, Jan 28, 2021 at 2:14 PM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:

Can we please discuss this. Please

see: https://www.azbbhe.us/sps_pdfs/Universal%20Recognition%20requirements%202019-01.pdf

Tobi Zavala, Executive Director



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On Thu, Jan 28, 2021 at 1:49 PM Trista Guzman Glover <tguzman@az.gov> wrote:
Tobi -

I believe that back in July 2019, all boards received a memo from the AG's office regarding the universal recognition statute. In that memo, the AG's office has interpreted the universal recognition statute in the same manner. Specifically, the AG's Office states that for A.R.S. 32-4302(A)(3), "the out-of-state licensee must meet educational and any work experience and clinical supervision requirements *that were required at the time of licensure...*"

Trista

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Director, Boards and Commissions

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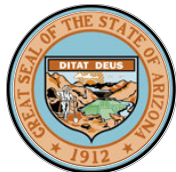


On Wed, Jan 27, 2021 at 4:13 PM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:

I respectfully ask you to reconsider. Our Board has determined that the same practice level is a master degree from a regionally accredited institution. This would be the same requirement for any of our licenses as well as our own very robust endorsement license which is separate from UR. A.R.S. § 32-3274(B) is clear and unambiguous regarding the educational requirements for licensure in that the applicant "**must** have earned a master's or higher degree in the applicable field of practice **granted by a regionally accredited college or university.**" ARS 32-3274, Licensure by Endorsement, they would not meet the educational requirements and would be denied. I do not believe that the laws are intended to have disparate results.

In the 2020 calendar year we issued 661 licenses by endorsement (3 years licensed in another state) and 264 UR (1 year licensed in another state).

Tobi Zavala, Executive Director



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On Wed, Jan 27, 2021 at 3:55 PM Trista Guzman Glover <tguzman@az.gov> wrote:
Good Afternoon, Tobi –

Thank you for the clarification. ARS 32-4302(A)(3) only requires that an applicant met the other state's minimum education and other requirements at the time of licensure; so as long as Mr. Hegelson met the other state's licensing requirements, he is entitled to a universal license in Arizona provided he meets all other requirements in ARS 32-4302.

Additionally, with regard to ARS 32-4302(A)(1) and same practice level, that provision applies to whether an individual was licensed to practice the same level of care in the other state as they are seeking to practice in Arizona (example: a dentist administering general anesthesia).

The request to deny Mr. Hegelson a universal license is denied.

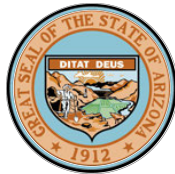
Please let me know if you have any questions.
Trista

Trista Guzman Glover | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions
P: (602) 512-4000
www.azgovernor.gov



On Tue, Jan 26, 2021 at 2:15 PM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:
Following up to confirm your approval.

Tobi Zavala, Executive Director



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On Mon, Jan 25, 2021 at 10:57 AM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:
After receiving your approval it was pointed out to me by one of my staff that my choice of verbiage may have been unintentionally misleading so I would like to clarify my request for Mr. Helgeson.

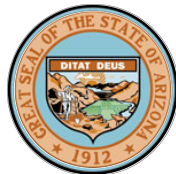
Request:

Pursuant to EO 2020-02 I request approval for our Board to deny Mr. Jayme Helgeson licensure under Universal Recognition. The applicant does not meet the Universal License requirement pursuant to A.R.S. § 32-4302 (A)(1) because he is not currently licensed in another state in the discipline applied for and at the same practice level as determined by the regulating entity because his masters in counseling is not from a regionally accredited college or university.

Clarification:

Pursuant to EO 2020-02 I request approval for our Board to deny Mr. Jayme Helgeson licensure under Universal Recognition. The applicant does not meet the Universal License requirement pursuant to A.R.S. § 32-4302 (A)(1) He does have a license in another state in the discipline applied for but that license is not determined to be at the same practice level as determined by the regulating entity because his masters in counseling is not from a regionally accredited college or university.

Tobi Zavala, Executive Director



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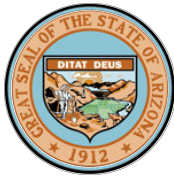
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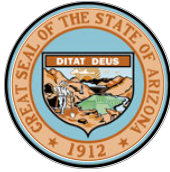
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From: [Tobi Zavala](#) on behalf of [Tobi Zavala <tobi.zavala@azbbhe.us>](#)
To: [Trista Guzman Glover](#)
Subject: Re: Clarification on Request Pursuant to EO 2020-02
Date: Tuesday, February 9, 2021 10:38:19 AM

Was this executive ordered renewed for 2021?

Tobi Zavala, Executive Director



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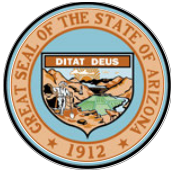
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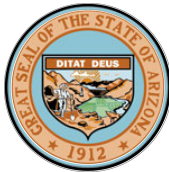
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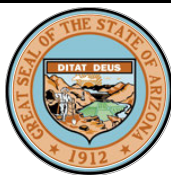


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Tobi Zavala, Executive Director



ARIZONA BOARD OF BEHAVIORAL HEALTH EXAMINERS
1740 W. Adams Street, Suite 3600, Phoenix, AZ 85007
Phone: 602-364-0890 Fax: 602-364-0890
Email: tobi.zavala@azbbhe.us
Board Website: www.azbbhe.us

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On Thu, Jan 28, 2021 at 2:58 PM Trista Guzman Glover <tguzman@az.gov> wrote:

Tobi -

Universal recognition and licensure by endorsement are two separate paths to licensure. These are not the same path to licensure. As such, each should follow the list of requirements outlined in statute.

Trista

Trista Guzman Glover | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions

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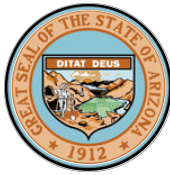
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Can we please discuss this. Please

see: https://www.azbbhe.us/sps_pdfs/Universal%20Recognition%20requirements%202019-01.pdf

Tobi Zavala, Executive Director

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I believe that back in July 2019, all boards received a memo from the AG's office regarding the universal recognition statute. In that memo, the AG's office has interpreted the universal recognition statute in the same manner. Specifically, the AG's Office states that for A.R.S. 32-4302(A)(3), "the out-of-state licensee must meet educational and any work experience and clinical supervision requirements *that were required at the time of licensure...*"

Trista

Trista Guzman Glover | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions

trista.guzman@governor.az.gov

www.azgovernor.gov



On Wed, Jan 27, 2021 at 4:13 PM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:

I respectfully ask you to reconsider. Our Board has determined that the same practice level is a master degree from a regionally accredited institution. This would be the same requirement for any of our licenses as well as our own very robust endorsement license which is separate from UR. A.R.S. § 32-3274(B) is clear and unambiguous regarding the educational requirements for licensure in that the applicant "**must** have earned a master's or higher degree in the applicable field of practice **granted by a regionally accredited college or university.**" ARS 32-3274, Licensure by Endorsement, they would not meet the educational requirements and would be denied. I do not believe that the laws are intended to have disparate results.

In the 2020 calendar year we issued 661 licenses by endorsement (3 years licensed in another state) and 264 UR (1 year licensed in another state).

Tobi Zavala, Executive Director



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Additionally, with regard to ARS 32-4302(A)(1) and same practice level, that provision applies to whether an individual was licensed to practice the same level of care in the other state as they are seeking to practice in Arizona (example: a dentist administering general anesthesia).

The request to deny Mr. Hegelson a universal license is denied.

Please let me know if you have any questions.
Trista

Trista Guzman Glover | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions

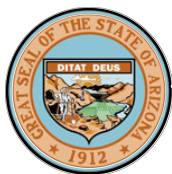
www.azgovernor.gov



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Following up to confirm your approval.

Tobi Zavala, Executive Director

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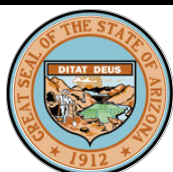
Request:

Pursuant to EO 2020-02 I request approval for our Board to deny Mr. Jayme Helgeson licensure under Universal Recognition. The applicant does not meet the Universal License requirement pursuant to A.R.S. § 32-4302 (A)(1) because he is not currently licensed in another state in the discipline applied for and at the same practice level as determined by the regulating entity because his masters in counseling is not from a regionally accredited college or university.

Clarification:

Pursuant to EO 2020-02 I request approval for our Board to deny Mr. Jayme Helgeson licensure under Universal Recognition. The applicant does not meet the Universal License requirement pursuant to A.R.S. § 32-4302 (A)(1) He does have a license in another state in the discipline applied for but that license is not determined to be at the same practice level as determined by the regulating entity because his masters in counseling is not from a regionally accredited college or university.

Tobi Zavala, Executive Director



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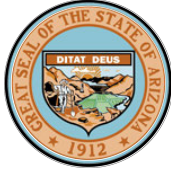
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From: [Trista Guzman Glover](mailto:tguzman@az.gov) on behalf of [Trista Guzman Glover <tguzman@az.gov>](mailto:tguzman@az.gov)
To: [Tobi Zavala](mailto:tobi.zavala@azbbhe.us)
Subject: Re: Clarification on Request Pursuant to EO 2020-02
Date: Tuesday, February 9, 2021 10:39:37 AM

EO2020-02 is still in effect.

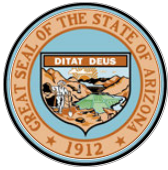
Trista Guzman Glover | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions

www.azgovernor.gov



On Tue, Feb 9, 2021 at 10:38 AM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:
Was this executive ordered renewed for 2021?

Tobi Zavala, Executive Director



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On Tue, Feb 9, 2021 at 9:21 AM Trista Guzman Glover <tguzman@az.gov> wrote:

Tobi -

I've spoken with the appropriate individuals within the Governor's Office. Our decision remains the same.
To reiterate:

- ARS 32-4302(A)(3) only requires that an applicant met the other state's minimum education and other requirements at the time of licensure; so as long as Mr. Hegelson met the other state's licensing requirements, he is entitled to a universal license in Arizona provided he meets all other requirements in ARS 32-4302.
- With regard to ARS 32-4302(A)(1) and same practice level, that provision applies to whether an individual was licensed to practice the same level of care in the other state as they are seeking to practice in Arizona (example: a dentist administering general anesthesia).

Trista

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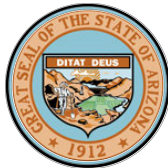


On Tue, Feb 9, 2021 at 6:15 AM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:
Trista,

I am meeting with the AG's office this morning. I have so many concerns about this concerning the decision. Again, who can I speak with this regarding this?

I had always heard that we were called the "vending machine state" put a quarter in and pick a license. I have defended that as it appeared decisions were being made to protect the public. If I had a kiddo that was cutting himself or worse I would sure like them to be treated by someone with a degree who has been trained and educated.

Tobi Zavala, Executive Director



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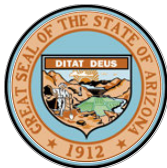
On Fri, Feb 5, 2021 at 4:08 PM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:

In all due respect, who else do I need to speak with. This is the way the board has been handling since August 2019 I'm not sure how we would start opening it up to non qualified individuals at different practice levels determined by our board. This makes no sense and it's controversial to the way we have been doing it for a year and a half.

On Fri, Feb 5, 2021 at 2:24 PM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:

To clarify, we will be licensing individuals with an associate degree and bachelor's degree moving forward. Scary for the people of Arizona.

Tobi Zavala, Executive Director



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On Fri, Feb 5, 2021 at 2:22 PM Trista Guzman Glover <tguzman@az.gov> wrote:

Hi, Tobí -

Thanks again for the robust conversation around this issue. I've gone back through Emily's inbox and notes and spoken to her as well. We cannot find any information about the substantive policy statement and Emily does not recall seeing it.

Our office stands by the denial to deny Mr. Helgeson a license under universal recognition. He should be granted a license under universal recognition because he met requirements of licensure from the original state of licensure at the time of licensure.

Trista

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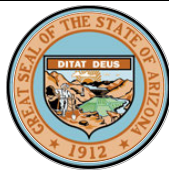


On Tue, Feb 2, 2021 at 8:33 AM Tobí Zavala <tobi.zavala@azbbhe.us> wrote:

Good morning Trista,

Thank you for your time on Friday. I want to circle back on this. I was transparent in this whole process because our Board has some of the highest numbers in issuing UR licenses. It's our understanding you want the same qualified individuals in Arizona as else well. It was always our understanding that the practice level would be determined by the Board. Our Board determines the same practice level to be a Master's from a regionally accredited university. If it was a bachelor's from a regionally accredited it too would be denied. Please vet this further with Emily and allow me to be part of that process. Thank you in advance.

Tobí Zavala, Executive Director



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On Thu, Jan 28, 2021 at 3:07 PM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:

Can we please discuss this? It is not the same level of practice as determined by our Board. Our Board has issued some of the highest numbers of UR as we support what UR means. A nationally accredited school is not the same level as determined by our Board. With that said, we have denied before EO and have strongly shared that this was a requirement along the way. This decision would have a chilling effect on so many past decisions. The state of Az does not want our behavioral health practitioners being licensed from a non-regionally accredited school.

Tobi Zavala, Executive Director



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Trista

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602-542-5000
www.az.gov



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Tobi Zavala, Executive Director



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The request to deny Mr. Hegelson a universal license is denied.

Please let me know if you have any questions.
Trista

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Following up to confirm your approval.

Tobi Zavala, Executive Director



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After receiving your approval it was pointed out to me by one of my staff that my choice of verbiage may have been unintentionally misleading so I would like to clarify my request for Mr. Helgeson.

Request:

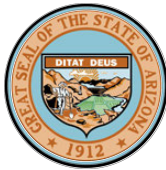
Pursuant to EO 2020-02 I request approval for our Board to deny Mr. Jayme Helgeson licensure under Universal Recognition. The applicant does not meet the Universal License requirement pursuant to A.R.S. § 32-4302 (A)(1) because he is not currently licensed in another state in the discipline applied for and at the same practice level as determined by the regulating entity because his masters in counseling is not from a regionally accredited college or university.

Clarification:

Pursuant to EO 2020-02 I request approval for our Board to deny Mr. Jayme Helgeson licensure under Universal Recognition. The applicant does not meet the Universal License requirement pursuant to A.R.S. § 32-4302 (A)(1) He does have a license in another state in the discipline applied for but that license is not determined to be at the same practice level as determined by the regulating entity because his masters in counseling is not from a regionally accredited college or university.

Tobi Zavala, Executive Director

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Phone ax: [602-364-0890](tel:602-364-0890)
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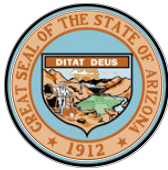


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--

Tobi Zavala, Executive Director



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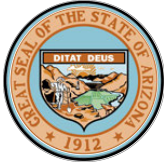
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From: [Tobi Zavala](#) on behalf of [Tobi Zavala <tobi.zavala@azbbhe.us>](#)
To: [Trista Guzman Glover](#)
Subject: Re: Clarification on Request Pursuant to EO 2020-02
Date: Tuesday, February 9, 2021 10:41:46 AM

Thank you. I have deferred my concerns with the decision to the AG's office. Super scary.

Tobi Zavala, Executive Director



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On Tue, Feb 9, 2021 at 10:39 AM Trista Guzman Glover <tguzman@az.gov> wrote:
EO2020-02 is still in effect.

Trista Guzman Glover | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions

www.azgovernor.gov



On Tue, Feb 9, 2021 at 10:38 AM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:
Was this executive ordered renewed for 2021?

Tobi Zavala, Executive Director



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On Tue, Feb 9, 2021 at 9:21 AM Trista Guzman Glover <tguzman@az.gov> wrote:
Tobi -

I've spoken with the appropriate individuals within the Governor's Office. Our decision remains the same. To reiterate:

- ARS 32-4302(A)(3) only requires that an applicant met the other state's minimum education and other requirements at the time of licensure; so as long as Mr. Hegelson met the other state's licensing requirements, he is entitled to a universal license in Arizona provided he meets all other requirements in ARS 32-4302.
- With regard to ARS 32-4302(A)(1) and same practice level, that provision applies to whether an individual was licensed to practice the same level of care in the other state as they are seeking to practice in Arizona (example: a dentist administering general anesthesia).

Trista

Trista Guzman Glover | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions

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On Tue, Feb 9, 2021 at 6:15 AM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:
Trista,

I am meeting with the AG's office this morning. I have so many concerns about this concerning the decision. Again, who can I speak with this regarding this?

I had always heard that we were called the "vending machine state" put a quarter in and pick a license. I have defended that as it appeared decisions were being made to protect the public. If I had a kiddo that was cutting himself or worse I would sure like them to be treated by someone with a degree who has been trained and educated.

Tobi Zavala, Executive Director



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On Fri, Feb 5, 2021 at 4:08 PM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:

In all due respect, who else do I need to speak with. This is the way the board has been handling since August 2019 I'm not sure how we would start opening it up to non qualified individuals at different practice levels determined by our board. This makes no sense and it's controversial to the way we have been doing it for a year and a half.

On Fri, Feb 5, 2021 at 2:24 PM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:

To clarify, we will be licensing individuals with an associate degree and bachelor's degree moving forward. Scary for the people of Arizona.

Tobi Zavala, Executive Director



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On Fri, Feb 5, 2021 at 2:22 PM Trista Guzman Glover <tguzman@az.gov> wrote:

Hi, Tobi -

Thanks again for the robust conversation around this issue. I've gone back through Emily's inbox and notes and spoken to her as well. We cannot find any information about the substantive policy statement and Emily does not recall seeing it.

Our office stands by the denial to deny Mr. Helgeson a license under universal recognition. He should be granted a license under universal recognition because he met requirements of licensure from the original state of licensure at the time of licensure.

Trista

Trista Guzman Glover | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions

www.azgovernor.gov



On Tue, Feb 2, 2021 at 8:33 AM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:

Good morning Trista,

Thank you for your time on Friday. I want to circle back on this. I was transparent in this whole

process because our Board has some of the highest numbers in issuing UR licenses. It's our understanding you want the same qualified individuals in Arizona as else well. It was always our understanding that the practice level would be determined by the Board. Our Board determines the same practice level to be a Master's from a regionally accredited university. If it was a bachelor's from a regionally accredited it too would be denied. Please vet this further with Emily and allow me to be part of that process. Thank you in advance.

Tobi Zavala, Executive Director



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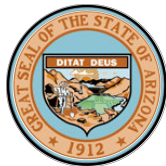
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On Thu, Jan 28, 2021 at 3:07 PM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:

Can we please discuss this? It is not the same level of practice as determined by our Board. Our Board has issued some of the highest numbers of UR as we support what UR means. A nationally accredited school is not the same level as determined by our Board. With that said, we have denied before EO and have strongly shared that this was a requirement along the way. This decision would have a chilling effect on so many past decisions. The state of Az does not want our behavioral health practitioners being licensed from a non-regionally accredited school.

Tobi Zavala, Executive Director



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Board Website: www.azbbhe.us

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On Thu, Jan 28, 2021 at 2:58 PM Trista Guzman Glover <tguzman@az.gov> wrote:

Tobi -

Universal recognition and licensure by endorsement are two separate paths to licensure. These are not the same path to licensure. As such, each should follow the list of

requirements outlined in statute.

Trista

Trista Guzman Glover | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions

www.azgovernor.gov



On Thu, Jan 28, 2021 at 2:14 PM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:

Can we please discuss this. Please

see: https://www.azbbhe.us/sps_pdfs/Universal%20Recognition%20requirements%202019-01.pdf

Tobi Zavala, Executive Director



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On Thu, Jan 28, 2021 at 1:49 PM Trista Guzman Glover <tguzman@az.gov> wrote:

Tobi -

I believe that back in July 2019, all boards received a memo from the AG's office regarding the universal recognition statute. In that memo, the AG's office has interpreted the universal recognition statute in the same manner. Specifically, the AG's Office states that for A.R.S. 32-4302(A)(3), "the out-of-state licensee must meet educational and any work experience and clinical supervision requirements *that were required at the time of licensure...*"

Trista

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Director, Boards and Commissions

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On Wed, Jan 27, 2021 at 4:13 PM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:

I respectfully ask you to reconsider. Our Board has determined that the same practice level is a master degree from a regionally accredited institution. This would be the same requirement for any of our licenses as well as our own very robust endorsement license which is separate from UR. A.R.S. § 32-3274(B) is clear and unambiguous regarding the educational requirements for licensure in that the applicant **"must have earned a master's or higher degree in the applicable field of practice granted by a regionally accredited college or university."** ARS 32-3274, Licensure by Endorsement, they would not meet the educational requirements and would be denied. I do not believe that the laws are intended to have disparate results.

In the 2020 calendar year we issued 661 licenses by endorsement (3 years licensed in another state) and 264 UR (1 year licensed in another state).

Tobi Zavala, Executive Director



ARIZONA BOARD OF BEHAVIORAL HEALTH EXAMINERS

1740 W. Adams Street, Suite 3600, Phoenix, AZ 85007

Phone Fax: 602-364-0890

Email: tobi.zavala@azbbhe.us

Board Website: www.azbbhe.us

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On Wed, Jan 27, 2021 at 3:55 PM Trista Guzman Glover <tguzman@az.gov> wrote:
Good Afternoon, Tobi –

Thank you for the clarification. ARS 32-4302(A)(3) only requires that an applicant met the other state's minimum education and other requirements at the time of licensure; so as long as Mr. Hegelson met the other state's licensing requirements, he is entitled to a universal license in Arizona provided he meets all other requirements in ARS 32-4302.

Additionally, with regard to ARS 32-4302(A)(1) and same practice level, that provision applies to whether an individual was licensed to practice the same level of care in the other state as they are seeking to practice in Arizona (example: a dentist administering general anesthesia).

The request to deny Mr. Hegelson a universal license is denied.

Please let me know if you have any questions.

Trista

Trista Guzman Glover | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions

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On Tue, Jan 26, 2021 at 2:15 PM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:
Following up to confirm your approval.

Tobi Zavala, Executive Director



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On Mon, Jan 25, 2021 at 10:57 AM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:

After receiving your approval it was pointed out to me by one of my staff that my choice of verbiage may have been unintentionally misleading so I would like to clarify my request for Mr. Helgeson.

Request:

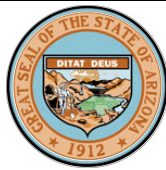
Pursuant to EO 2020-02 I request approval for our Board to deny Mr. Jayme Helgeson licensure under Universal Recognition. The applicant does not meet the Universal License requirement pursuant to A.R.S. § 32-4302 (A)(1) because he is not currently licensed in another state in the discipline applied for and at the same practice level as determined by the regulating entity because his masters in counseling is not from a regionally accredited college or university.

Clarification:

Pursuant to EO 2020-02 I request approval for our Board to deny Mr. Jayme Helgeson licensure under Universal Recognition. The applicant does not meet the Universal License requirement pursuant to A.R.S. § 32-4302 (A)(1) He does have a license in another state in the

discipline applied for but that license is not determined to be at the same practice level as determined by the regulating entity because his masters in counseling is not from a regionally accredited college or university.

Tobi Zavala, Executive Director



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Tobi Zavala, Executive Director



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From: [Pat McSorley](#) on behalf of [Pat McSorley <patricia.mcsorley@azmd.gov>](#)
To: [Trista Guzman \(tguzman@az.gov\)](#); [Kristina Frederickson](#)
Subject: Request for Guidance on EO 2021-02 (5)
Date: Monday, February 22, 2021 1:21:35 PM
Attachments: [image.png](#)
[image.png](#)

Trista,
In an effort to comply with EO 2021-02 (5), please see the "Important Board Information and Events to Remember" that is on our website. The AMB's usefulness for DHS, and County Health, and others, is that we can serve as a conduit of information. In addition, the AM uses its website to provide information on a variety of topics such as CME. Should we remove this information as I don't believe there is a statute or rule that explicitly addresses this information. Any Guidance would be appreciated.

5. A State agency subject to this Order shall not publicize any directives, policy statements, documents or forms on its website unless such are explicitly authorized by the Arizona Revised Statutes or Arizona Administrative Code. Any material that is not specifically authorized must be removed immediately.

Important Board Information and Events to Remember

Event Date	Board Information or Event
	The AMB Is Seeking Public Comment on Rules Articles 6 & 7 - Comments Due by COB March 15, 2021
	The AMB Is Seeking Public Comment on Rules Article 3 - Comments Due by COB March 15, 2021
	The AMB Is Seeking Public Comment on Rules Article 2 - Comments Due by COB March 15, 2021
	Letter and Order from Maricopa County Public Health Department RE: Required Blood Testing for Infant Syphilis
	Notice to Healthcare Providers on COVID-19 Vaccination Data Collection from ADHS
	New Virtual Program for Arizona Physicians
	Frequently Asked Questions Regarding Continuing Medical Education (CME)
	Email dated 04/10/2020 re: COVID-19 Emergency Applications to Practice
	Fake AMB Agents Extortion Scams
	Licensure by Universal Recognition
	Posted Location For Meetings...
	Arizona to Recognize Licenses From Other States
June 18, 2018	Physicians Who Certify Vital Statistic Documents – Please Read
	How to request review of a final rule from the Governor's Regulatory Review Council...
	Governor's "Regulation Rollback"...

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Patricia McSorley
Executive Director
Arizona Medical Board
Arizona Regulatory Board of
Physician Assistants

From: [Heidi Paakkonen](#) on behalf of [Heidi Paakkonen <heidi.paakkonen@psychboard.az.gov>](#)
To: [Trista Guzman Glover](#)
Subject: Re: Temporary Emergency Licenses & the Declaration of Emergency
Date: Tuesday, March 23, 2021 11:45:49 AM

Trista,

Thanks very much for inviting this input. The Board of Psychologist Examiners has started to hold some conversations on post-COVID issues, and I expect that will continue over the next several months. Here is what I can tell you thus far:

- When the State of Emergency ends, how much time will these licensees need to wrap up their jobs? **The Board's statutes for both psychologists and for behavior analysts allow for a 20-day period of licensure exemption to practice. This allows temporary license holders time to transfer care, if needed. Many psychologist temporary license holders can apply for a telehealth practice privilege into Arizona through the PSYPACT interstate compact. Many of the other waivers that were approved by Dr. Christ in her capacity as DHS Director allow for a period of phase-out by design as the Board recognized that transition time back to "normal" is needed.**
- If these individuals have now moved to Arizona, what is a reasonable amount of time for these temporary or emergency licensees to go through the regular licensing process? **Thus far very few of the temporary license holders have moved to Arizona; the few that did have applied for and been approved for licensure. Anyone who qualifies for licensure by Universal Recognition can expect to be licensed within 3 weeks of having a complete file.**
- Any other thoughts/concerns **Given that PSYPACT is expected to be adopted in many more states in the coming months, this will go a long way toward facilitating practice mobility for purposes of addressing where mental health care services are critically needed.**

I will send you the excerpts of the Board meeting minutes during which these and related issues are discussed.

Heidi

On Tue, Mar 23, 2021 at 11:18 AM Trista Guzman Glover <tguzman@az.gov> wrote:

Good Morning -

I am reaching out to gather some information on temporary/emergency licenses you have that are contingent on the Declaration of Emergency.

As we continue to move forward with vaccinations, inevitably the Declaration of Emergency will have an expiration date. So far, we haven't started these discussions, but I want to reach out to you preemptively because many of your boards have licenses (particularly the healthcare regulatory boards) that are temporary and/or emergency licenses that may or may not be subject to the Emergency Declaration.

Our office needs your feedback related to these licenses. Things to consider:

- When the State of Emergency ends, how much time will these licensees need to wrap up their jobs?
- If these individuals have now moved to Arizona, what is a reasonable amount of time for these temporary or emergency licensees to go through the regular licensing process?
- Any other thoughts/concerns

Again, we have not started these conversations. I do not want to alarm anyone, but your feedback is critical for when we inevitably start these conversations.

If you could gather your thoughts and send me a response, I would greatly appreciate it.

Thank you and don't hesitate to reach out if you have any questions.

Best,
Trista

Trista Guzman Glover | Office of Arizona Governor Doug Ducey
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Please note: The Board continues to serve the public during the state of emergency declared by Governor Ducey on March 11, 2020 as a result of the advancement of the COVID-19 virus. Board staff is maximizing opportunities to telework in accordance with issued advisories, and plans are in place to ensure services are not disrupted. We ask for your patience, however, our typical response times may be slightly impacted. The most effective way to make an inquiry with the Board office is to email us. Staff has very limited access to phone/voicemail so we strongly encourage email communications.

Please note that the Board staff is prohibited from providing legal advice or interpretation: Legal advice could be described, but is not limited to: offering interpretation of statute or of rules; recommending a course of action; reviewing advertisement media for possible violations; predicting a board decision and interpreting the meaning or effect of any board order or other judgment.

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From: [Trista Guzman Glover](#) on behalf of [Trista Guzman Glover <tguzman@az.gov>](#)
To: [Tobi Zavala](#)
Bcc: [glepore@az.gov](#)
Subject: Universal Recognition Denial
Date: Monday, April 26, 2021 10:57:41 AM
Attachments: [Letter to Trista re licensure 4 21 21 -final.docx](#)

Good Morning, Tobi -

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Why was our office not consulted about a denial of this universal recognition license?

Trista

Trista Guzman Glover | **Office of Arizona Governor Doug Ducey**
Director, Boards and Commissions

www.azgovernor.gov



From: [Trista Guzman Glover](#) on behalf of [Trista Guzman Glover <tguzman@az.gov>](#)
To: [Tobi Zavala](#)
Bcc: [glepore@az.gov](#)
Subject: Re: Universal Recognition Denial
Date: Monday, April 26, 2021 12:41:48 PM

She was not able to provide her education information? She mentions that she has an MA.

Trista Guzman Glover | **Office of Arizona Governor Doug Ducey**
Director, Boards and Commissions

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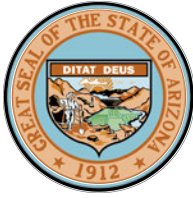
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Tobi Zavala, Executive Director



ARIZONA BOARD OF BEHAVIORAL HEALTH EXAMINERS

1740 W. Adams Street, Suite 3600, Phoenix, AZ 85007

Phone: Fax: [602-364-0890](tel:602-364-0890)

Email: tobi.zavala@azbbhe.us

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To: [Trista Guzman Glover](#)
Subject: Re: Universal Recognition Denial
Date: Monday, April 26, 2021 2:48:55 PM

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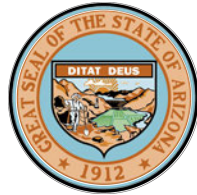
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Tobi Zavala, Executive Director



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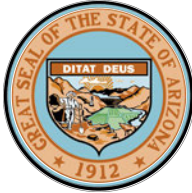
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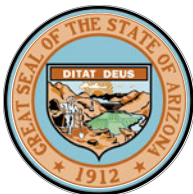
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Subject: Re: Universal Recognition Denial
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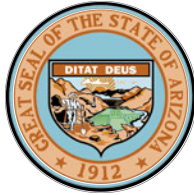
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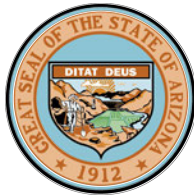
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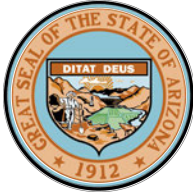
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Bcc: [glepore@az.gov](#)
Subject: Re: Universal Recognition Denial
Date: Monday, April 26, 2021 3:00:03 PM

Looking back at the letter again, it says her application will be denied after the appeals process. Should I expect an email then about the denial of her application?

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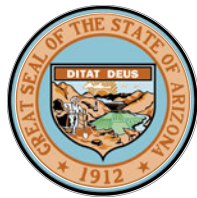
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Email: tobi.zavala@azbbhe.us

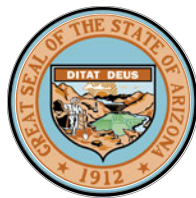
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Tobi Zavala, Executive Director



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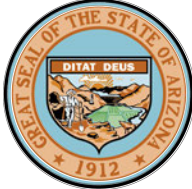
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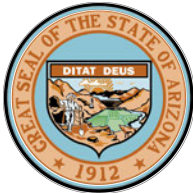
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From: [Tobi Zavala](#) on behalf of [Tobi Zavala <tobi.zavala@azbbhe.us>](#)
To: [Trista Guzman Glover](#)
Subject: Re: Universal Recognition Denial
Date: Monday, April 26, 2021 3:14:56 PM

That is correct. Frustrated that you think that we would license somebody that has a psychology license. It's not about the degree it's about the license per universal recognition statute. I am currently on vacation and I will check back on Wednesday if you have any more questions. As I'm always trying to be available for you and our constituents.

On Mon, Apr 26, 2021 at 6:00 PM Trista Guzman Glover <tguzman@az.gov> wrote:
Looking back at the letter again, it says her application will be denied after the appeals process. Should I expect an email then about the denial of her application?

Trista Guzman Glover | **Office of Arizona Governor Doug Ducey**
Director, Boards and Commissions

www.azgovernor.gov



On Mon, Apr 26, 2021 at 2:54 PM Trista Guzman Glover <tguzman@az.gov> wrote:
I understand that she has a Master of Psychology. My question was related to LPCs and what master degrees are accepted for an LPC.

The letter she received looks like a denial letter. She did apply through the Board, correct? So at some point in time, she will be receiving a denial, correct? Or does the application just sit in limbo?

Again, I'm not trying to be difficult here, but when we have constituents reach out to us with what appears to be a denial and I haven't seen anything from the Board about it, I get confused because it seems I should've been looped in.

I also am concerned that I've asked a few pointed questions that I cannot seem to get an answer to.

Trista Guzman Glover | **Office of Arizona Governor Doug Ducey**
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She has a masters is psychology. Again, as I mentioned she has not been denied as the EO requires approval to do so. We have several steps before an individual is denied. With that said, she needs to apply to psychology board.

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I understand that. Can you please provide an answer to me about the degrees? Again, I am trying to get a full picture of the scenario.

I would refer you back to [EO2021-02](#) Section 8:
"Before any agency denies a professional or occupational license applied for under A.R.S. 32-4302, the agency shall submit the application and justification for denial to the Office of the Governor for review before any official action is taken by the agency. The Governor's Office should be notified of any required timeframes, whether in statute or rule, for approval or denial of the license by the agency."

It appears this person did submit a full application. In the future, please run these by the Governor's Office.

Trista

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On Mon, Apr 26, 2021 at 1:09 PM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:
She is licensed as a psychologist not a counselor. She needs to apply for the psychology board that not the Counseling board. The statute clearly says they have to be licensed at the same level and at the same discipline. Therefore she should be applying for the psychology board not us. No reason to reach out when they have the wrong license.

On Mon, Apr 26, 2021 at 4:06 PM Trista Guzman Glover <tguzman@az.gov> wrote:

I'm trying to understand the situation. It is my understanding that the What master degrees allow an individual to become licensed as an LPC? I could not find that information on the board's website.

Typically boards still reach out to me before denying a license even if the denial is determined because of insufficient information or eligibility.

Trista

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On Mon, Apr 26, 2021 at 12:59 PM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:

He license is psychology not counseling. She needs to apply for a psychology license. We shared this with her. What do you want me to do?

On Mon, Apr 26, 2021 at 3:41 PM Trista Guzman Glover <tguzman@az.gov> wrote:

She was not able to provide her education information? She mentions that she has an MA.

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On Mon, Apr 26, 2021 at 12:38 PM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:

Because she is not through the process as this person does not have any degree whatsoever.

On Mon, Apr 26, 2021 at 1:57 PM Trista Guzman Glover

<tguzman@az.gov> wrote:

Good Morning, Tobi -

We've had a constituent (Kathy Roaleen) reach out to our office about being denied a license under Universal Recognition (attached documents).

I did not see a denial request come through to be pursuant to EO2021-02. It looks like she may have been denied a license in a similar situation as we previously discussed back in January/February. I believe that individual was ultimately granted a license (per the board's license directory).

Why was our office not consulted about a denial of this universal recognition license?

Trista

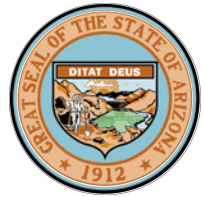
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Tobi Zavala, Executive Director



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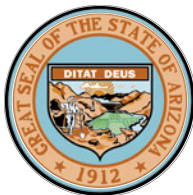
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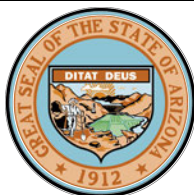
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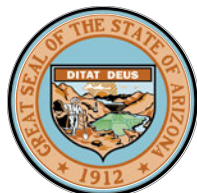
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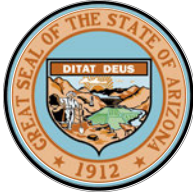
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From: [Tobi Zavala](mailto:Tobi.Zavala@azbbhe.us) on behalf of [Tobi Zavala <tobi.zavala@azbbhe.us>](mailto:Tobi.Zavala@azbbhe.us)
To: [Trista Guzman Glover](mailto:Trista.Guzman.Glover@azleg.gov)
Subject: Fwd: Universal Recognition
Date: Monday, April 26, 2021 3:16:48 PM

We have done everything we can to help this constituent out.

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

From: **Keesha Esquerette** <KEsquerette@azleg.gov>
Date: Mon, Feb 22, 2021 at 6:13 PM
Subject: RE: Universal Recognition
To: Tobi Zavala <tobi.zavala@azbbhe.us>

Mrs. Zavala,

Thank you for your assistance with this matter.

Respectfully,

Keesha Esquerette

Administrative Assistant For

Rep. Walter Blackman

--

From: Tobi Zavala <tobi.zavala@azbbhe.us>
Sent: Monday, February 22, 2021 2:46 PM
To:
Cc: Walter Blackman <WBlackman@azleg.gov>; Keesha Esquerette <KEsquerette@azleg.gov>
Subject: Universal Recognition

Good afternoon Ms. Roaleen,

The Board has received your application for universal recognition and based on my conversation with staff they have been in contact with you. In my review of your application you do not meet the qualifications of universal recognition based on the following: Pursuant to 32-4302 you must be licensed in the same discipline in which you are applying for. You are licensed as a psychologist in Michigan. Our Board regulates counselors, social workers, marriage and family therapists and

substance abuse counselors. Therefore, you will need to apply with the Psychology Board. The link is: <https://psychboard.az.gov/>. Please give me a call if I can be of further assistance.

Good Day,

My name is Kathryn Roaleen. I moved to Arizona 2 years ago from Michigan. I am licensed in Michigan as a Limited Licensed Psychologist (MA level). I practiced as an LLP from 1995-2018 in private practice and public service, under the clinical supervision of a PhD. Psychologist. Prior to that I was a BA level licensed social worker for 15 years. When I moved here, I let the LBSW licensure lapse, but kept my LLP. My main area of practice and interest has been working with PTSD since the early 1980's

Last year I volunteered for the Arizona Crisis Team (ACT) in Verde Valley. I met Terry Keller, Fire Chief for Copper Canyon Fire and Medical Services as an ACT volunteer. We were discussing ACT services as a PTSD preventative. I shared with Terry my many years of working with PTSD therapy, including adjunctive mind/body/spirit therapies to increase the efficacy of counseling. Chief Keller is greatly concerned about the mental health of his firefighters. He stated he wanted Yavapai county first responder agencies to co-ordinate and re-design a protocol for treatment of PTSD for all the first responders in the county. His plan is for the fire and police stations in Verde Valley to partner and hire me to consult on PTSD protocols and provide treatment. He expressed concern that the current mental health support for his men is less than adequate. First responders have difficulty talking about some of the horrendous events they encounter. They are "Fire Family", and much of their trauma experience stays "at work" and within their team-mates. Terry wanted to ensure I would be a therapist/counselor/educator "his guys" would share their feelings with. I agreed to ride-along with the 6 shifts of firemen/medics at Copper Canyon stations in Rimrock and Camp Verde. I loved every minute of it! I was impressed at how quickly and seamlessly these talented men included me in their teams. I have done crisis work in mental health for decades and am medically astute, so we "spoke the same language." Chief Keller and I agree, I am a good fit for this position, and I am extremely excited about working with these incredible heroic men.

I have found my dream job, so I have applied for a licensure to practice. Arizona initiated universal licensure reciprocity last year. I am licensed in MI by the Psychology Licensing Board (graduated 1995). I discovered that the Arizona Psychology board only licenses PhD providers. So, I checked Behavioral Health Licensing. They provide M.A. licensure for M.A. level mental health practitioners. My professional experience fits best with the description of Licensed Professional Counselor. The board reviewed my app and sent me a letter approving it, pending review. Upon review I was informed I was likely to be denied licensure because my degree is in Psychology, not counseling. I have a M.A., a very polished therapeutic skill set, over 40 years of mental health experience, and a potential job that *really* needs my skills. The Behavioral Health Board suggested I contact the AZ Psychology board to advocate getting licensed as a MA practitioner. I called them twice. No one is in the office due to COVID-19 and I was encouraged to e-mail. I emailed them twice, requesting a phone call in response. They finally sent me a form letter via e-mail saying they only license PhD providers. I called again specifically requesting a call to discuss my issue. I got a responding

e-mail asking what my issue is so my query could be forwarded to the appropriate individual. I wrote back explaining my problem. They again sent me the same form letter regarding licensure of PhD practitioners only.

The Behavioral Health Board is holding my application, as pending, till early Jan. At that point they would officially make a statement about approval or denial, with the option to appeal if I am denied. They also stated that all state licensure is taking longer due to COVID. I really would like to get this resolved. I do not really care if I am licensed as a psychologist or a counselor. I just want to use my education and skills to help people manage and/or avoid PTSD.

I know there is precedent for “grandfathering” people with special skills sets by state licensure. I was hired as staff when Michigan piloted a research treatment program (Harbinger of Grand Rapids) for people with severe and persistent mental illness. Our research results were so successful, the State of Michigan mandated all counties initiate ACT teams. They grandfathered all Harbinger BA level clinicians for licensure as Bachelor of Social Work, and the state contracted with Harbinger to train all the new ACT teams. The ACT treatment model is now replicated all over the world and is one of the most researched programs in the treatment of people with severe and persistent mental illnesses. It was quite the radical program in 1979 and I was proud to work there for 15 years. My interest in PTSD was born at Harbinger, and I became the “go to” person for treatment of PTSD. I left Harbinger to get my MA to work independently with people with PTSD, under the MALLP guidelines of the state. I kept my BSW license until moving to AZ. I planned to retire here, and allowed that licensure to lapse, but maintained my MA licensure.

Rather than retire, I want to help Yavapai County meet the need for competent mental health services. I am sure you are aware that in our rural area human services ~~in~~ are not adequate to meet our needs. This is an exceedingly difficult time with COVID-19. So many of our citizens are experiencing high levels of trauma from the virus, and the culture it has necessitated. In addition, treatment for First Responders is a very specialized field. These firefighters/medics are daily exposed to extremely traumatic events. Much like the military, they are prepared to lay down their lives in service to the community. Fire Chief Terry Keller and I have done the homework to establish that I have the skills to work with this incredibly complex group of people. I am well steeped in the research on PTSD from the 1980’s to the present and provide best practice holistic interventions that are not currently practiced in this area.

Is there any way you can intervene with the licensure boards so we can figure out how I can get to work? I am anxious to get licensed, and begin help heal the pain of PTSD for the citizens of Arizona.

I am looking forward to hearing from you soon.

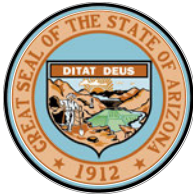
Thank you, in advance, for your help.

It is easiest to reach me by phone. My number is

Sincerely,

Kathy Roaleen MA, LLP

Tobi Zavala, Executive Director



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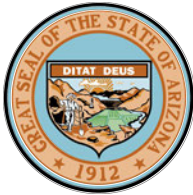
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To: [Trista Guzman Glover](#)
Subject: Re: Universal Recognition Denial
Date: Monday, April 26, 2021 3:17:53 PM

It appears this issue should be with the Psych Board not us.

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That is correct. Frustrated that you think that we would license somebody that has a psychology license. It's not about the degree it's about the license per universal recognition statute. I am currently on vacation and I will check back on Wednesday if you have any more questions. As I'm always trying to be available for you and our constituents.

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Director, Boards and Commissions

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It appears this person did submit a full application. In the future, please run these by the Governor's Office.

Trista

Trista Guzman Glover | **Office of Arizona Governor Doug Ducey**

Director, Boards and Commissions

C

www.azgovernor.gov



On Mon, Apr 26, 2021 at 1:09 PM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:
She is licensed as a psychologist not a counselor. She needs to apply for the psychology board that not the Counseling board. The statute clearly says they have to be licensed at the same level and at the same discipline. Therefore she should be applying for the psychology board not us. No reason to reach out when they have the wrong license.

On Mon, Apr 26, 2021 at 4:06 PM Trista Guzman Glover <tguzman@az.gov> wrote:

I'm trying to understand the situation. It is my understanding that the What master degrees allow an individual to become licensed as an LPC? I could not find that information on the board's website.

Typically boards still reach out to me before denying a license even if the denial is determined because of insufficient information or eligibility.

Trista

Trista Guzman Glover | Office of Arizona Governor Doug Ducey

Director, Boards and Commissions

○

www.azgovernor.gov



On Mon, Apr 26, 2021 at 12:59 PM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:

He license is psychology not counseling. She needs to apply for a psychology license. We shared this with her. What do you want me to do?

On Mon, Apr 26, 2021 at 3:41 PM Trista Guzman Glover <tguzman@az.gov> wrote:

She was not able to provide her education information? She mentions that she has an MA.

Trista Guzman Glover | Office of Arizona Governor Doug Ducey

Director, Boards and Commissions

○

www.azgovernor.gov



On Mon, Apr 26, 2021 at 12:38 PM Tobi Zavala <tobi.zavala@azbbhe.us> wrote:

Because she is not through the process as this person does not have any degree whatsoever.

On Mon, Apr 26, 2021 at 1:57 PM Trista Guzman Glover

<tguzman@az.gov> wrote:

Good Morning, Tobi -

We've had a constituent (Kathy Roaleen) reach out to our office about being denied a license under Universal Recognition (attached documents).

I did not see a denial request come through to be pursuant to EO2021-02. It looks like she may have been denied a license in a similar situation as we previously discussed back in January/February. I believe that individual was ultimately granted a license (per the board's license directory).

Why was our office not consulted about a denial of this universal recognition license?

Trista

Trista Guzman Glover | Office of Arizona Governor Doug Ducey
Director, Boards and Commissions

O.

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Tobi Zavala, Executive Director



ARIZONA BOARD OF BEHAVIORAL HEALTH EXAMINERS

[1740 W. Adams Street, Suite 3600, Phoenix, AZ 85007](http://1740.W.AdamsStreet,Suite3600,Phoenix,AZ.85007)

Phone: Fax: 602-364-0890

Email: tobi.zavala@azbbhe.us

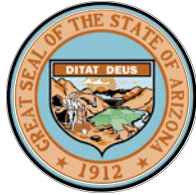
Board Website: www.azbbhe.us

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Tobi Zavala, Executive Director



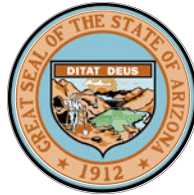
ARIZONA BOARD OF BEHAVIORAL HEALTH EXAMINERS
[1740 W. Adams Street, Suite 3600, Phoenix, AZ 85007](http://www.azbbhe.us)
Phone: 602-542-5600 Fax: 602-364-0890
Email: tobi.zavala@azbbhe.us
Board Website: www.azbbhe.us

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Tobi Zavala, Executive Director



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Tobi Zavala, Executive Director



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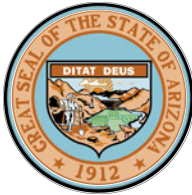
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--

Tobi Zavala, Executive Director



ARIZONA BOARD OF BEHAVIORAL HEALTH EXAMINERS

1740 W. Adams Street, Suite 3600, Phoenix, AZ 85007

Phone: [redacted] Fax: 602-364-0890

Email: tobi.zavala@azbbhe.us

Board Website: www.azbbhe.us

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ARIZONA BOARD OF BEHAVIORAL HEALTH EXAMINERS

1740 W. Adams Street, Suite 3600, Phoenix, AZ 85007

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From: [Ryan Edmonson](#) on behalf of [Ryan Edmonson <ryan.edmonson@dentalboard.az.gov>](#)
To: [Heather Curry](#)
Cc: [Sherrie Biggs](#); [Nancy Elia](#); [Trista Guzman Glover](#); [Gabee Lepore](#); [Ryan Edmonson](#)
Subject: Re: Public Records Request
Date: Monday, July 12, 2021 5:25:19 PM
Attachments: [Records Rqst 7-2021.pdf](#)

Good Evening Heather,

Please see the Board's attached response. If you have any questions, please feel free to contact me.

Respectfully,

Ryan P. Edmonson

Executive Director



Arizona State Board of Dental Examiners
1740 West Adams Street, Suite 2470

Phoenix, Arizona 85007

P

C:

E: ryan.edmonson@dentalboard.az.gov

W: <https://dentalboard.az.gov/>

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On Wed, Jul 7, 2021 at 6:15 AM Heather Curry <hcurry@goldwaterinstitute.org> wrote:

Good morning, Mr. Edmonson,

I hope you had a wonderful holiday weekend!

I am writing to request an update on the numbers you provided below related to universal

recognition applications. The previous request included the number of applications (total, approved, denied, pending) from August 2019 to now for both dentists and hygienists. Your formatting was really helpful last time and I can't wait to see how things have gone the past few months. Please let me know if there's anything I can do on my end to help with this request.

Thank you, as always, for your time and attention to this!

Best,

Heather

Heather Curry

Goldwater Institute

From: Ryan Edmonson <ryan.edmonson@dentalboard.az.gov>

Sent: Wednesday, April 14, 2021 11:10 AM

To: Heather Curry <hcurry@goldwaterinstitute.org>

Cc: Trista Guzman Glover <tguzman@az.gov>; Gabee Lepore <glepore@az.gov>; Kristina Gomez <kristina.gomez@dentalboard.az.gov>; Sherrie Biggs <sherrie.biggs@dentalboard.az.gov>; Nancy Elia <nancy.elia@dentalboard.az.gov>

Subject: Re: Public Records Request

No, that was probably my haste. My apologies. It should be attached now.

Ryan P. Edmonson

Executive Director



Arizona State Board of Dental Examiners
1740 West Adams Street, Suite 2470

Phoenix, Arizona 85007

P

C:

E: ryan.edmonson@dentalboard.az.gov

W: <https://dentalboard.az.gov/>

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On Wed, Apr 14, 2021 at 8:07 AM Heather Curry <hcurry@goldwaterinstitute.org> wrote:

Good morning!

Thank you so much. For some reason, the attachment didn't come through on my end. Would you mind resending?

Thanks again and all the best,

Heather

From: Ryan Edmonson <ryan.edmonson@dentalboard.az.gov>

Sent: Wednesday, April 14, 2021 10:45 AM

To: Heather Curry <hcurry@goldwaterinstitute.org>

Cc: Trista Guzman Glover <tguzman@az.gov>; Gabee Lepore <glepore@az.gov>; Kristina Gomez <kristina.gomez@dentalboard.az.gov>; Sherrie Biggs <sherrie.biggs@dentalboard.az.gov>; Nancy Elia <nancy.elia@dentalboard.az.gov>

Subject: Public Records Request

Good Morning Heather,

Please see the attached letter addressing your request(s) for universal recognition numbers.

If you have any questions, please feel free to contact me.

Respectfully,

Ryan P. Edmonson

Executive Director



Arizona State Board of Dental Examiners
1740 West Adams Street, Suite 2470

Phoenix, Arizona 85007

P:

C:

E: ryan.edmonson@dentalboard.az.gov

W: <https://dentalboard.az.gov/>

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Douglas A. Ducey,
Governor

Arizona State Board of Dental Examiners

“Caring for the Public’s Dental
Health and Professional Standards”

1740 West Adams Street, Suite 2470

Phoenix, Arizona 85007

P: (602)242-1492

E: info@dentalboard.az.gov

W: <https://dentalboard.az.gov>

July 12, 2021

Heather Curry

Goldwater Institute

via: email only to: hcurry@goldwaterinstitute.org

Re: Public Information Request

Ms. Curry:

Please see the Arizona State Board of Dental Examiners’ (“Board”) responses (**bold**) to your questions (repeated) below.

1. A list of total applications, including statuses approved, rejected or pending, which have been sought under the provisions of A.R.S. § 32-4302 since its inception. **Please see responses below:**

Dentist applications	138
Dentist applications approved	113
Dentist applications denied	0
Dentist applications pending	3
Dentist applications withdrawn	22
Hygienist applications	113
Hygienist applications approved	104
Hygienist applications denied	0
Hygienist applications pending	2
Hygienist applications withdrawn	7

If you have any further questions, please feel free to contact our office.

Respectfully,

Ryan P. Edmonson
Executive Director

Cc: Kristina Gomez via: kristina.gomez@dentalboard.az.gov
Sherrie Biggs via: sherriebiggs@dentalboard.az.gov
Nancy Elia via: nancy.elia@dentalboard.az.gov
Trista Guzman Glover via: tguzman@az.gov
Gabee Lepore via: glepore@az.gov

From: [Natasha Culbertson](mailto:Natasha.Culbertson@funeralboard.az.gov) on behalf of [Natasha Culbertson <natasha.culbertson@funeralboard.az.gov>](mailto:Natasha.Culbertson@funeralboard.az.gov)
To: glepore@az.gov
Cc: [Maria Zavala](mailto:Maria.Zavala@funeralboard.az.gov)
Subject: Fwd: Inquiry for License Out of country
Date: Tuesday, July 27, 2021 4:09:03 PM

Good Afternoon Gabee,

I received the email below from a possible future licensee. I had reached out to the Attorney General's Office for legal advice and was instructed to ask for clarification/guidance from the Governor's Office. I was wondering if this individual would qualify for Universal Recognition and be able to apply for licensure in Arizona under A.R.S. 32-4302? They would be relocating from Canada and how the statute reads, it describes someone who holds an active license from another state, but not from another country. Any guidance would be greatly appreciated.

Thank you,

Natasha Culbertson
Executive Director
Arizona State Board of Funeral Directors and Embalmers
1740 W. Adams St., Suite 3006
Phoenix, Arizona 85007
Website: www.funeralboard.az.gov
Natasha.Culbertson@funeralboard.az.gov

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

From: **Laurel Foreman** <laurelforeman@outlook.com>
Date: Tue, Jul 27, 2021 at 8:58 AM
Subject: Inquiry for License Out of country
To: natasha.culbertson@funeralboard.az.gov <natasha.culbertson@funeralboard.az.gov>

Good Morning

I am seeking information on licensing. I'm going to become a Class 1 Funeral Director and Embalmer. I've been successful in my studies at Humber College in Toronto Canada. Once I write our provincial exams I will be licensed.

We plan to relocate to the US in three years when my husband retires from military service.

I'd like to know my options please for work in the state— can I write the state license exams to meet equivalence or perform an internship?

Please advise.

Regards

Laurel

From: [Gabee Lepore](#) on behalf of [Gabee Lepore <glepore@az.gov>](#)
To: [Natasha Culbertson](#)
Cc: [Maria Zavala](#)
Subject: Re: Inquiry for License Out of country
Date: Wednesday, July 28, 2021 8:26:28 AM

Hi Natasha,

Let me look into this and get back to you!

On Tue, Jul 27, 2021 at 4:09 PM Natasha Culbertson
<natasha.culbertson@funeralboard.az.gov> wrote:

Good Afternoon Gabee,

I received the email below from a possible future licensee. I had reached out to the Attorney General's Office for legal advice and was instructed to ask for clarification/guidance from the Governor's Office. I was wondering if this individual would qualify for Universal Recognition and be able to apply for licensure in Arizona under A.R.S. 32-4302? They would be relocating from Canada and how the statute reads, it describes someone who holds an active license from another state, but not from another country. Any guidance would be greatly appreciated.

Thank you,

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Natasha.Culbertson@funeralboard.az.gov

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to meet equivalence or perform an internship?

Please advise.

Regards

Laurel

--

Gabriella Lepore | Office of Arizona Governor Doug Ducey

Deputy Director, Boards and Commissions

O:

C:

www.azgovernor.gov



From: [Gabee Lepore](#) on behalf of [Gabee Lepore <glepore@az.gov>](#)
To: [Natasha Culbertson](#)
Cc: [Maria Zavala](#)
Subject: Re: Inquiry for License Out of country
Date: Wednesday, July 28, 2021 10:52:02 AM

Hi Natasha,

A.R.S. 32-4302 only applies when a person has an active license in another state, and not in another country. While the universal recognition statute doesn't apply, it's possible that the Board might have other statutes or rules that might apply.

I hope this is helpful.

Gabee

On Wed, Jul 28, 2021 at 8:26 AM Gabee Lepore <glepore@az.gov> wrote:

Hi Natasha,

Let me look into this and get back to you!

On Tue, Jul 27, 2021 at 4:09 PM Natasha Culbertson
<natasha.culbertson@funeralboard.az.gov> wrote:

Good Afternoon Gabee,

I received the email below from a possible future licensee. I had reached out to the Attorney General's Office for legal advice and was instructed to ask for clarification/guidance from the Governor's Office. I was wondering if this individual would qualify for Universal Recognition and be able to apply for licensure in Arizona under A.R.S. 32-4302? They would be relocating from Canada and how the statute reads, it describes someone who holds an active license from another state, but not from another country. Any guidance would be greatly appreciated.

Thank you,

Natasha Culbertson
Executive Director
Arizona State Board of Funeral Directors and Embalmers
1740 W. Adams St., Suite 3006
Phoenix, Arizona 85007
Website: www.funeralboard.az.gov
Natasha.Culbertson@funeralboard.az.gov

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To: natasha.culbertson@funeralboard.az.gov <natasha.culbertson@funeralboard.az.gov>

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Please advise.

Regards

Laurel

--

Gabriella Lepore | Office of Arizona Governor Doug Ducey
Deputy Director, Boards and Commissions

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Deputy Director, Boards and Commissions

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C:

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From: [Natasha Culbertson](#) on behalf of [Natasha Culbertson <natasha.culbertson@funeralboard.az.gov>](#)
To: [Gabee Lepore](#)
Cc: [Maria Zavala](#)
Subject: Re: Inquiry for License Out of country
Date: Wednesday, July 28, 2021 12:08:30 PM

Thank you very much Gabee, I appreciate the quick response. The Funeral Board does have a statute specific to out-of-state licenses so I'll follow-up with legal counsel regarding it.

Thank you again for your assistance. I hope you have a great rest of your day!

Natasha Culbertson
Executive Director
Arizona State Board of Funeral Directors and Embalmers
1740 W. Adams St., Suite 3006
Phoenix, Arizona 85007
Website: www.funeralboard.az.gov
Natasha.Culbertson@funeralboard.az.gov

On Wed, Jul 28, 2021 at 10:52 AM Gabee Lepore <glepore@az.gov> wrote:

Hi Natasha,

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I hope this is helpful.

Gabee

On Wed, Jul 28, 2021 at 8:26 AM Gabee Lepore <glepore@az.gov> wrote:

Hi Natasha,

Let me look into this and get back to you!

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Good Afternoon Gabee,

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Regards

Laurel

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Gabriella Lepore | Office of Arizona Governor Doug Ducey

Deputy Director, Boards and Commissions

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Gabriella Lepore | Office of Arizona Governor Doug Ducey
Deputy Director, Boards and Commissions

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From: [Natasha Culbertson](#) on behalf of [Natasha Culbertson <natasha.culbertson@funeralboard.az.gov>](mailto:natasha.culbertson@funeralboard.az.gov)
To: [Gabee Lepore](#)
Subject: Question Regarding Universal Recognition
Date: Thursday, September 2, 2021 1:58:24 PM

Good Afternoon Gabee,

The Funeral Board received a Universal Recognition application for licensure and the applicant has had disciplinary action imposed by another regulating entity. The Board's legal counsel suggested that I reach out to the Governor's Office to clarify if the Board is able to grant a license under A.R.S. 32-4302 if the applicant has had imposed discipline since it is stated in section A, number 6 that, "The person has not had discipline imposed by any other regulating entity. If another jurisdiction has taken disciplinary action against the person, the regulating entity shall determine if the cause for the action was corrected and the matter resolved. If the matter has not been resolved by that jurisdiction, the regulating entity may not issue or deny a license until the matter is resolved."

The Board has been provided with a copy of the imposed discipline and the applicant's current license from the other state is in good standing but legal counsel wanted to verify that these qualifications would meet the requirements to be considered "resolved". Any guidance and/or clarification regarding this would be greatly appreciated. Please let me know if you have any questions or need any additional information.

Thank you,

Natasha Culbertson
Executive Director
Arizona State Board of Funeral Directors and Embalmers
1740 W. Adams St., Suite 3006
Phoenix, Arizona 85007
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