



COLORADO

**Department of
Regulatory Agencies**

Division of Professions and Occupations

**Colorado House Bill 16-1197: Streamlining the granting of
occupational credentials to veterans based on military training.**

Implementation Report

June 28, 2019



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Regulatory Agencies**

Division of Professions and Occupations

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Dear Colorado General Assembly members and
Representative Tracy Kraft-Tharp (Chair), Business Affairs and Labor Committee;
Senator Angela Williams (Chair), Business, Labor, and Technology Committee;
Representative Chris Kennedy (Chair), State, Veterans, and Military Affairs Committee;
Senator Mike Foote (Chair), State, Veterans, and Military Affairs Committee

Please accept this report as fulfillment of the annual reporting requirements of Colorado House Bill 16-1197 (HB 16-1197). HB 16-1197 requires State agencies to “implement a program to streamline the granting of occupational credentials to veterans based on military training.”

Within the Department of Regulatory Agencies, the Division of Professions and Occupations (DPO) regulates approximately 50 professions where streamlining of credentialing processes may apply to veterans. DPO launched an implementation project known as “Veterans Occupational Credentialing and Licensing” (VOCAL) on December 15, 2016.

This year, VOCAL implementation completed analysis and streamlining, where applicable, for twelve (12) professions. Analysis and streamlining efforts resulted in the adoption of one (1) new board policy and one (1) new board rule, as well as three (3) new DPO Director rules, to streamline the granting of occupational credentials to veterans based on military training. Additionally, VOCAL implementation completed analysis and began the rulemaking and policy adoption processes for five (5) additional professions. Based on the VOCAL analyses, DPO anticipates this will result in the adoption of two (2) new board rules and three (3) new board policies.

Finally, DPO’s VOCAL program has seen tangible, quantifiable success. This includes the licensure of five (5) nurses during this fiscal year who have taken advantage of streamlined Board of Nursing policies adopted in Fiscal Year 2017. These individuals were able to successfully leverage their prior military experience, while taking advantage of the Board of Nursing policies to expedite their applications for licensure.

DPO will continue to provide annual summaries of VOCAL implementation progress, and is pleased with the progress it has accomplished within this fiscal year. Thank you for consideration of our report.

Sincerely,



Ronne Hines
Director
Division of Professions and Occupations

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I. Executive Summary

Introduction

Colorado House Bill 16-1197 (HB 16-1197) requires State agencies to “implement a program to streamline the granting of occupational credentials to veterans based on military training.” Within the Department of Regulatory Agencies, the Division of Professions and Occupations (DPO) regulates approximately 50 professions where streamlining of licensure processes may apply to veterans. To fulfill legislative requirements, DPO launched an implementation project known as “Veterans Occupational Credentialing and Licensing” (VOCAL) on December 15, 2016.

During the past twelve (12) months, DPO conducted VOCAL analysis on the following seventeen (17) professions, building on the work of the last two years: audiologists, certified public accountants, combative sports officials, combative sports participants, combative sports seconds, combative sports promoters, fantasy contest operators, hearing aid providers, anesthesiologist assistants, physicians, physician assistants, occupational therapists, occupational therapy assistants, optometrists, pharmacists, podiatrists, and veterinarians.

Analysis Requirements

DPO VOCAL analyses utilized five key elements, which are specified in HB 16-1197:

- 1) Evaluate military training as related to state requirements to practice an occupation.
- 2) Identify reciprocity mechanisms with other states.
- 3) Determine if an occupational exam is available to authorize a veteran to practice an occupation.
- 4) Consult post-secondary educational institutions regarding:
 - a) Courses or programs to cover the gap between military occupational specialty training and training required to practice an occupation; and
 - b) Refresher courses for reinstatement of lapsed civilian credentials.
- 5) Consider adopting a national credentialing exam.

Highlights

- **Analysis Results**
 - One (1) new board policy and one (1) new board rule, as well as three (3) new DPO Director rules, were adopted to streamline the granting of occupational credentials to veterans based on military training related to the following professions: audiologists, hearing aid providers, occupational therapists, occupational therapy assistants, and podiatrists.
 - VOCAL analyses were completed and DPO staff and Boards began the rulemaking and policy adoption processes for five (5) additional professions, including: certified public accountants, combative sports officials, physician assistants, physicians, and optometrists. Based on the VOCAL analysis and the current rulemaking and policy

adoption processes, DPO anticipates this will result in the adoption of two (2) new board rules and three (3) new board policies in the upcoming fiscal year related to these professions.

- VOCAL analysis of anesthesiologist assistants, combative sports participants, combative sports seconds, combative sports promoters, fantasy sports contest operators, pharmacists, and veterinarians found that no streamlining was necessary.
- **Pathways to Licensure, Certification, or Registration.** DPO added new sub-pages on the websites of the Board of Nursing, the State Board of Veterinary Medicine, and the State Board of Pharmacy, to clearly document the pathway(s) available to veterans to obtain authorization to practice, to satisfy a requirement of HB 16-1107 (Section 24-4-303(1)(a), C.R.S.) to document pathways to licensure.
- **Stakeholder Involvement, Outreach, and Communications**
 - In November of 2018, DPO launched a “Veterans & Military Advisory Committee” to provide DPO with guidance on the development of occupational licensing policies for veterans and members of the military community and provide a forum for conversations with post-secondary educational institutions. This Committee also provides recommendations on how DPO can best communicate new policies, rules, and programs to the relevant military and veteran communities so that they can take full advantage of the opportunities available. The Committee met three (3) times in Fiscal Year 2019. Members of the Committee include representatives from state, federal, and non-profit organizations.
 - DPO staff provided updates on the VOCAL program, and other programs for members of the military and military spouses, to six (6) Boards. As applicable, these boards also provided input on the analyses conducted for the professions under their corresponding purview.
 - DPO updated its [Military & Veterans Program - VOCAL Career Pathway](#) website to more clearly document the results of the VOCAL analyses completed to date.
 - DPO staff presented information to veteran service coordinators from the Colorado Department of Labor & Employment (CDLE) on the VOCAL program at an October 2018 CDLE training in Grand Junction.
 - DPO staff attended the May 2019 grand opening of the Western Region One Source in Grand Junction. This facility is dedicated to serving veterans and members of the military and their families.
 - DPO hosted a booth for the opening day of Delta’s Salute to the Armed Forces Festival, to distribute information to festival attendees on veteran streamlining initiatives and other DPO programs for veterans, members of the military, and military spouses.
 - DPO’s dedicated staff liaison regularly addressed licensing and credentialing inquiries from military members, military spouses, and veterans.

- **Impact of VOCAL**

- This year five (5) nurse applicants successfully leveraged their prior military experience to obtain licensure through streamlined Board of Nursing policies that were adopted in Fiscal Year 2017. Building upon the four (4) veterans licensed as nurses in previous years, this brings the total nurses who have leveraged their prior military experience for licensure to nine (9), since the inception of VOCAL and adoption of the nursing policies.
- Veterans who use the VOCAL nursing policies and whose military experience and training is found by the Board of Nursing to be equivalent to that of a practical nurse save both time and money. For example, the practical nursing program at Emily Griffith Technical College costs over \$11,000 and takes approximately 11 to 18 months to complete. Such costs and delays in entering this occupation can therefore be avoided by veterans who use the VOCAL policies and are found to have equivalent military training experience.

Conclusion and Next Steps

Fiscal Year 2019 was a success for DPO's VOCAL program. With the adoption of one (1) new board policy, one (1) new board rule, and three (3) new DPO Director rules, the VOCAL program achieved its goals in streamlining licensure for military veterans. Additionally, the program saw its policies benefit several individuals personally, including the five (5) nurses who successfully became licensed through streamlined Board of Nursing policies.

In the next Fiscal Year, rulemaking and policy adoption will continue for the professions for which analysis concluded this year, and it was determined that adoption of rules or policies was necessary in order to streamline licensure for veterans. Subsequent VOCAL analyses are planned in accordance with the implementation timeline directed by HB 16-1197. Finally, in the next fiscal year, DPO hopes to advertise and communicate the success of its VOCAL program to veterans and other partners so as to allow for more individuals to take advantage of any adopted streamlined policies and rules for professional licensure or certification in Colorado.

II. Introduction

On May 20, 2016 Governor John Hickenlooper signed Colorado House Bill 16-1197 (HB 16-1197) titled: “Concerning a requirement that state agencies implement a program to streamline the granting of occupational credentials to veterans based on military training.” HB 16-1197 contains the following requirement: “Each state agency that authorizes an occupation to practice shall provide by June 30, 2017, and by June 30 of each year thereafter until June 30, 2023, a written report of its progress in implementing this Part 2 to each member of: the General Assembly; the Business Affairs and Labor Committee of the House of Representatives; the Business, Labor, and Technology Committee of the Senate; the State, Veterans, and Military Affairs Committees of the House of Representatives and the Senate, or their successor committees.” This report is provided by the Colorado Department of Regulatory Agencies (DORA), Division of Professions and Occupations (DPO) in order to satisfy the above requirement.

DPO regulates approximately 50 professions, many of which have comparable military elements where streamlining of licensure processes may be applicable. Due to these large scale implementation requirements, DPO created a new Regulatory and Veterans Policy Analyst position in December 2016 to initiate and manage the project on an ongoing basis. The implementation project was designated “Veterans Occupational Credentialing and Licensing” (VOCAL) and launched on December 15, 2016.

DPO identified the following professions for initial VOCAL consideration in Fiscal Year 2016-2017: Engineering, Nursing, Dental, and Physical Therapy. The selection criteria included Governor Hickenlooper’s employment priorities, current labor trends, and professions where DPO has high licensing volume for transitioning veterans. Table 1 depicts all initial professions and sub-professions considered for streamlining measures in Fiscal Year 2016-2017.

Table 1. Initial Veterans Occupational Credentialing and Licensing Professions

Engineering	Nursing	Dental	Physical Therapy
Professional Engineer	Advanced Practice Nurse	Dentist	Physical Therapist
Engineer Intern	Registered Nurse	Dental Hygienist	Physical Therapist Assistant
	Licensed Practical Nurse		
	Certified Nurse Aide-Medication Aide Authority		
	Certified Nurse Aide		
	Licensed Psychiatric Technician		

As shown in Table 2, in Fiscal Year 2017-2018, DPO identified the following professions for VOCAL consideration: Addiction Counselor, Architect, Barber, Cosmetologist, Electrician, Esthetician, Hairstylist, Land Surveyor, Landscape Architect, Marriage and Family Therapist, Nail Manicurist, Plumber, Professional Counselor, Psychologist, Psychotherapist, Social Worker, Surgical Assistant, and Surgical Technologist.

Table 2. Fiscal Year 2018 Veterans Occupational Credentialing and Licensing Professions

Addiction Counselor	Architect	Barber	Cosmetologist	Electrician	Esthetician
Certified Addiction Counselor I	Architect	Barber	Cosmetologist	Residential Wireman	Esthetician
Certified Addiction Counselor II				Journeyman Electrician	
Certified Addiction Counselor III				Master Electrician	
Licensed Addiction Counselor					
Hairstylist	Landscape Architect	Land Surveyor	Marriage and Family Therapist	Nail Manicurist	Plumber
Hairstylist	Landscape Architect	Land Surveyor	Licensed Marriage and Family Therapist	Manicurist	Residential Plumber
					Journeyman Plumber
					Master Plumber
Professional Counselor	Psychologist	Psychotherapist	Social Worker	Surgical Assistant	Surgical Technologist
Licensed Professional Counselor	Licensed Psychologist	Registered Psychotherapist	Social Worker	Surgical Assistant	Surgical Technologist

As shown in Table 3, in Fiscal Year 2018-2019, DPO identified the following professions for VOCAL consideration: Audiology, Certified Public Accountant, Combative Sports, Fantasy Contest Operator, Hearing Aid Provider, Medical, Occupational Therapy, Optometry, Pharmacy, Podiatry, and Veterinary Medicine.

Table 3. Fiscal Year 2019 Veterans Occupational Credentialing and Licensing Professions

Audiology	Certified Public Accountant	Combative Sports	Fantasy Contests	Hearing Aid Provider	Medical
Audiologist	Certified Public Accountant	Official	Fantasy Contest Operator	Hearing Aid Provider	Anesthesiologist Assistant
		Participant			Physician Assistant
		Promoter			Physician
		Second			
Occupational Therapy	Optometry	Pharmacy	Podiatry	Veterinary Medicine	
Occupational Therapist	Optometrist	Pharmacist	Podiatrist	Veterinarian	
Occupational Therapy Assistant					

III. Analysis Requirements & Process

HB 16-1197 established the criteria below for state agencies to streamline the granting of occupational credentials to veterans based on military training. The criteria are now codified in Colorado Revised Statute 24-4-203. Specifically, HB 16-1197 (Section 24-4-203, C.R.S.) requires that each agency shall:

- a) Document the following results and publish a summary of pathways available to a veteran to obtain authorization to practice an occupation:
 - i) Evaluate the extent to which military training meets all or part of the state requirements to be authorized to practice an occupation;
 - ii) Identify reciprocity mechanisms with other states; and
 - iii) Determine if an occupational exam is available to authorize a veteran to practice an occupation;
- b) Consult with community colleges and other post-secondary educational institutions with regard to:
 - i) Courses or programs to cover the gap between military occupational specialty training and the training required to be authorized to practice an occupation; and
 - ii) Refresher courses for the reinstatement of lapsed civilian credentials; and
- c) Consider adopting a national credentialing exam.

Utilizing the above criteria, DPO analyzed each of the professions and sub-professions listed in Table 3, using the following steps:

1. Analyze Requirements
 - a. Analyze current Colorado requirements (statute, rule, policy) in comparison to military qualifications, training, and education
 - b. Identify reciprocity mechanisms
 - c. Identify relevant national occupational exams
2. Consult with stakeholders, such as:
 - a. Veterans & Military Advisory Committee members
 - b. Post-secondary educational institutions
 - c. DPO Program staff
 - d. DPO Licensing staff
3. Draft proposed policies and/or rules, as needed
4. Consult with Board or DPO Director to adopt policies and/or rules, as needed

IV. Results Summary

This year's VOCAL program results include tangible regulatory reform, through adoption of rules and policies for various professions, as well as successful stakeholder involvement and outreach efforts and positive impacts on the veteran population.

Analysis Results. The analysis and streamlining efforts this year are detailed by program in the next section. In summary:

- One (1) new board policy, one (1) new board rule, and three (3) new DPO Director rules were adopted to streamline the granting of occupational credentials to veterans based on military training in the following professions:
 - Audiologist
 - Hearing aid provider
 - Occupational therapist
 - Occupational therapy assistant
 - Podiatrist
- VOCAL analyses were completed and DPO staff and boards began the rulemaking and policy adoption processes for five (5) additional professions. Based on the VOCAL analysis and the current rulemaking and policy adoption processes, DPO anticipates this will result in the adoption of two (2) new board rules and three (3) new board policies. These professions include:
 - Certified public accountant
 - Combative sports official
 - Optometrist
 - Physician
 - Physician assistant
- VOCAL analyses of anesthesiologist assistants, combative sports participants, combative sports seconds, combative sports promoters, fantasy sports contest operators, pharmacists, and veterinarians found that no streamlining policies were necessary.
 - *Anesthesiologist assistants*: The analysis determined no similar professional equivalency can be found in the military for anesthesiologist assistants.
 - *Combative sports participants, seconds, and promoters*: The analyses determined that these professions have minimal barriers to entry, and, subsequently, no streamlined policies are needed.
 - *Fantasy contest operators*: The analysis determined that this profession has minimal barriers to entry, and, subsequently, no streamlined policies are needed.
 - *Pharmacists*: The analysis determined that licensing of pharmacists is already streamlined because all military pharmacists are required to hold a license from a US jurisdiction and licenses from all US jurisdictions held by veterans are eligible for transfer to Colorado.
 - *Veterinarians*: The analysis determined that licensing of veterinarians is already streamlined, through rules previously adopted by the State Board of Veterinary Medicine specific to military and veteran applicants.

Pathways to Licensure, Certification, or Registration. DPO added new sub-pages on the websites of three (3) boards and programs, to clearly document the pathway(s) available to veterans to obtain authorization to practice an occupation, to satisfy a requirement of HB 16-1107 (Section 24-4-303(1)(a), C.R.S.) to document pathways to licensure. Specifically, DPO added new sub-pages for the following programs/boards:

- [Boarding of Nursing: Military/Veteran Licensing page](#) (see Appendix A)
- [State Board of Veterinary Medicine: Military/Veteran Licensing page](#) (see Exhibit 11(A), in Part VI, Section 11)
- [State Board of Pharmacy: Military/Veteran Licensing page](#) (see Exhibit 9(A), in Part VI, Section 9)

Stakeholder Involvement, Outreach, and Communications.

- In November of 2018, DPO launched a “Veterans & Military Advisory Committee” to provide DPO with guidance on the development of occupational licensing policies and rules for veterans and members of the military community and provide a forum for conversations with post-secondary educational institutions. This Committee also provides recommendations on how DPO can best communicate new policies, rules, and programs to the relevant military and veteran communities so that they can take full advantage of the opportunities available. The Committee met three (3) times in Fiscal Year 2019. Members of the Committee include representatives from the following organizations:
 - Buckley Air Force Base
 - Colorado Department of Labor & Employment
 - Colorado Department of Military & Veterans Affairs
 - Colorado Department of Higher Education
 - Colorado Community College System
 - National Conference of State Legislatures
 - RK Mechanical
 - Solutions for Information Design LLC (SOLID)
 - US Department of Defense State Liaison Office
 - US Department of Veterans Affairs
 - United Service Organization (USO) Pathfinder Program (Colorado Springs)
- DPO staff provided updates to six (6) boards on the VOCAL program, and other programs for members of the military and military spouses. As applicable, these boards also provided input on the analyses conducted for the professions under their corresponding purview. DPO updated and consulted the following boards:
 - Board of Accountancy
 - Colorado Medical Board
 - State Board of Optometry
 - State Board of Pharmacy
 - Colorado Podiatry Board
 - State Board of Veterinary Medicine

- DPO updated its [Military & Veterans Program - VOCAL Career Pathway](#) website to more clearly document the results of the VOCAL analyses completed to date.
- DPO staff presented information to veteran service coordinators from the Colorado Department of Labor & Employment (CDLE) on the VOCAL program at an October 2018 CDLE training in Grand Junction.
- DPO staff attended the May 2019 grand opening of the Western Region One Source in Grand Junction. This facility is dedicated to serving veterans and members of the military and their families.
- DPO hosted a booth for the opening day of Delta's Salute to the Armed Forces Festival to distribute information to festival attendees on veteran streamlining initiatives and other DPO programs for veterans, members of the military, and military spouses. The festival included viewing of the replica Vietnam Memorial Wall and a D-Day anniversary ceremony. Festival organizers widely advertised this four-day event to the veteran and military communities on the western slope.
- As a broad streamlining measure affecting all 50 professions within DPO, DPO designated the External Affairs team, which houses policy analysts, as the dedicated liaison for military members, military spouses, and veterans regarding all credentialing inquiries or licensure applications. This measure provides an opportunity for tailored service to members of the military and veterans, through all phases of the credentialing process. In Fiscal Year 2019, DPO's dedicated staff liaison regularly addressed licensing and credentialing inquiries from military members, military spouses, and veterans.

Impact of VOCAL. An example of the VOCAL program's success can be demonstrated by highlighting the five (5) individuals who took advantage of the Board of Nursing (Board) streamlined policies for veterans during this fiscal year. These five (5) applicants were successful in leveraging their prior military experience to satisfy the Board's requirements, as were the four (4) veterans licensed as nurses in previous years through the use of the VOCAL policies. All together, this brings the total nurses who have leveraged their prior military experience for licensure to nine (9) since the inception of VOCAL and adoption of the nursing policies.

- These veteran applicants successfully leveraged their prior military experience and the streamlined VOCAL policies to obtain licensure, thus saving valuable time, money, and effort. Specifically, a veteran who uses the VOCAL policies and whose military experience and training is found by the Board to be equivalent to that of a practical nurse may save both time and money related to the education that would have otherwise been required. For example, the [practical nursing program](#) at Emily Griffith Technical College costs over \$11,000 and takes approximately 11 to 18 months to complete.¹ Such costs and delays in entering this occupation can be avoided by veterans who use the VOCAL policies and are found to have equivalent military training experience. Overall, the success of the Board of Nursing's streamlined rules and policies exemplify how the VOCAL program has a tangible, positive impact on the professional lives of military veterans in Colorado.

¹ Practical Nursing Program information from Emily Griffith Technical College's website, as of 25 June 2019 (<https://www.emilygriffith.edu/practical-nursing>)

- Example success stories of veterans leveraging the Board’s VOCAL policy include:
 - A veteran was able to use the Board’s VOCAL policy for licensure as a practical nurse to bypass completing the educational courses and clinical hours typically required for non-veteran applicants. Specifically, she was able to demonstrate that her military experience, training, and education was substantially equivalent to that required to sit for the statutorily-required practical nurse exam. This applicant passed the exam on her first attempt and the Board issued her a multi-state practical nurse license in October 2018.
 - A veteran with experience as an Army medic applied under the Board’s VOCAL policy for licensure as a practical nurse. The Board found that the applicant had nearly substantially-equivalent qualifications - including training and experience gained in the military - except for in one area, pediatrics. Board staff then assisted this applicant by identifying how he could obtain this experience through supervised clinical pediatric clock hours. Once he completed these hours, the applicant passed the statutorily-required practical nurse exam and the Board issued him a practical nurse license in April 2019.

V. Conclusion & Next Steps

This report demonstrates DPO’s progress toward fulfillment of HB 16-1197 requirements to “implement a program to streamline the granting of occupational credentials to veterans based on military training,” known within DPO as the VOCAL project. With the adoption of one (1) new board policy, one (1) new board rule, and three (3) new DPO Director rules, the VOCAL program achieved its goals in streamlining licensure for military veterans. Additionally, the program saw its policies benefit several individuals personally, including the five (5) nurses who successfully became licensed through streamlined Board of Nursing policies.

The next year of DPO’s implementation will include continuing the rulemaking and policy adoption processes currently underway, based on the analyses that were conducted during Fiscal Year 2019 for the following professions:

- Certified Public Accountant
- Combative Sports Official
- Optometrist
- Physician
- Physician Assistant

In the next year, DPO will also be conducting VOCAL analysis for the following professions and occupations, in accordance with HB 16-1197 implementation timelines:

- Acupuncturist
- Athletic Trainer
- Chiropractor
- Direct-Entry Midwife
- Massage Therapist

- Naturopathic Doctor
- Nursing Home Administrator
- Outfitter
- Private Investigator
- Respiratory Therapist
- Speech-Language Pathologist

Finally, in the next fiscal year, DPO hopes to advertise and communicate the success of its VOCAL program to veterans and other partners so as to allow for more individuals to take advantage of any adopted streamlined policies and rules for professional licensure in Colorado.

VI. Fiscal Year 2019 Analysis Results - By Profession

1. Audiologists

VOCAL analysis of the credentialing process for audiologists identified streamlining measures related to applying military education, training, or experience towards licensure requirements. Specifically, the Office of Audiology Licensure (Office) promulgated two rules to streamline licensure for veterans.

- The Office promulgated Rule 11 (Credit for Military Education, Training, or Experience and Pathways to Licensure for Veterans and Members of the Military), which states that military education, training, or service that is substantially equivalent to that required in Colorado will be accepted towards the qualifications for licensure, upon submission of satisfactory evidence. See Exhibit 1(A) below for this rule.
- The Office promulgated a revised Rule 2 (Licensure by Endorsement), which states that the practice of audiology as part of military service shall be credited towards active practice requirements, when an applicant seeks to substitute active practice for minimum education requirements or the requirement to pass an exam or obtain an audiology certification (applicable to those who hold only a master's degree from a program with a concentration in audiology). See Exhibit 1(B) below for this rule.

Once these rules are effective (anticipated in July 2019), DPO will publish the pathway to licensure for veterans on a new sub-page of the website of the Office of Audiology Licensure. Analysis results:

- *Extent to which military training meets requirements to practice an occupation:* Pursuant to the Office's new Rule 11, military education, training, or service that is substantially equivalent to that required in Colorado will be accepted towards the qualifications for licensure, upon submission of satisfactory evidence. Additionally, pursuant to the Board's revised Rule 2, the practice of audiology as part of military service shall be credited towards active practice requirements.
- *Identify reciprocity measures with other states:* While Colorado does not offer audiologist licensure via reciprocity, applicants with a license from another jurisdiction can apply for a Colorado license by endorsement, pursuant to the Office's rules and regulations.
- *Determine if an occupational exam is available to authorize practice:* The Praxis Examination in Audiology, offered by the American Speech-Language-Hearing Association (ASHA), qualifies an individual for ASHA certification. ASHA certification offers one pathway allowing authorization to practice in Colorado, for applicants with only a master's degree. Some branches of the military also require ASHA certification.

Exhibit 1(A)

Rule 11: Credit for Military Education, Training, or Experience and Pathways to Licensure for Veterans and Members of the Military

The purpose of this Rule is to provide pathways to licensure for individuals with training, education, or experience gained during military service pursuant to sections 24-34-102(8.5) and 24-4-201 et seq., C.R.S.

- A. An applicant for licensure may submit information about the applicant's education, training, or experience acquired during military service. It is the applicant's responsibility to provide timely and complete information for the Director's review.
- B. In order to meet the requirements for licensure, such education, training, or experience must be substantially equivalent to the required qualifications that are otherwise applicable at the time the application is received by the Director.
- C. The Director will determine, on a case-by-case basis, whether the applicant's military education, training, or experience meet the requirements for licensure.
- D. Documentation of military experience, education, or training may include, but is not limited to, the applicant's Certificate of Release or Discharge from Active Duty (DD-214), Verification of Military Experience and Training (DD-2586), military transcript, training records, evaluation reports, or letters from commanding officers describing the applicant's practice.

Exhibit 1(B)

Rule 2: Licensure by Endorsement

The purpose of this rule is to clarify licensure by endorsement requirements pursuant to section 12-29.9-106, C.R.S.

- A. To qualify for licensure by endorsement an applicant must:
 - 1. Possess an active license in good standing to practice audiology in another state or territory of the United States or in a foreign country; and
 - 2. Present satisfactory proof to the Director that the active license in good standing issued required qualifications substantially equivalent to the qualifications for original licensure in Colorado.
- B. Substantially equivalent qualifications may be determined by the Director and may include the following:
 - 1. Earned a doctoral degree in audiology from a program, that is or, at the time the applicant was enrolled and graduated, was offered by an institution of higher education or postsecondary education accredited by:
 - a. The Council on Academic Accreditation (CCA) within the American Speech-Language-Hearing Association (ASHA), or
 - b. The Accreditation Commission for Audiology Education (ACAE), which is recognized by the Council for Higher Education Accreditation (CHEA) and approved by the Director.
 - 2. In the alternative, substantially equivalent qualifications may include:
 - a. Earned a master's degree from a program with a concentration in audiology, and
 - b. Passed an acceptable entry-level examination or obtained a certificate of competency in audiology.

- C. The Director may consider substituting either:
1. Five (5) years of active practice in good standing as an audiologist, completed within the eight (8) years prior to the date of application, in place of B(2)(a) above, or
 2. Documentation of 1,820 hours of active practice in good standing as an audiologist, completed within the three (3) years prior to the date of application in place of the acceptable entry-level examination or obtained a certificate of competency in audiology in section (B)(2)(b) of this Rule.
- D. The practice of audiology as part of military service, including a clinical audiology externship, shall be credited towards the requirements of active practice of section (C) of this Rule.

2. Certified Public Accountants (CPAs)

VOCAL analysis identified two pathways for veterans to become CPAs - through reciprocity (described below in the analysis results) or through initial application to the Board of Accountancy (Board). For initial application, veterans must meet requirements related to their education and professional experience, as well as pass an examination (described below in analysis results). Pursuant to a previously adopted Board rule (Rule 5.1.B), experience, education, or training gained in the military may be credited towards qualifications for licensure if the Board determines it is substantially equivalent to that required in Colorado. This is most relevant to the education and experience requirements for initial licensure. Specifically:

- Under current Board rules, military training, experience, or education for which a veteran receives college credit at an accredited baccalaureate granting college may apply towards the minimum education requirements. Education requirements include not only obtaining a bachelor's degree, but also completing certain courses.
- Military training, experience, or education may apply towards the one year of professional experience required, if the experience meets the Board's requirements set in rule and has been appropriately verified.

Related to the experience verification process, the Board and DPO staff identified an opportunity for streamlining. Based on this, the Board and DPO staff are currently working to draft and adopt a policy that would streamline the verification process for veterans who gained some or all of the required experience while serving in the military. Analysis results:

- *Extent to which military training meets requirements to practice an occupation:* Pursuant to a previously-adopted Board rule (Rule 5.1.B), military training, education, or experience that is substantially equivalent to that required in Colorado will be accepted towards the qualifications for licensure, upon submission of satisfactory evidence.
- *Identify reciprocity measures with other states:* Veterans who hold a current, valid license or registration as a certified public accountant from another US state or jurisdiction are eligible for a reciprocal license in Colorado, pursuant to the rules and regulations of the Board.
- *Determine if an occupational exam is available to authorize practice:* The Uniform CPA Examination, offered by the American Institute of CPAs, is required for authorization to practice in all US jurisdictions.

3. Combative Sports

- **Participants, Seconds, Promoters:** VOCAL analysis of the credentialing process for combative sports participants, seconds, and promoters found no need for streamlining measures because these professions have minimal barriers to entry. Specifically, the only qualifications for a participant is a minimum age and federal registration, the only qualifications for a second is a minimum age, and the only qualifications for a promoter is a minimum age and carrying an appropriate surety bond and appropriate insurance. Analysis results:
 - *Extent to which military training meets requirements to practice an occupation:* Military training is not applicable to credentialing requirements.
 - *Identify reciprocity measures with other states:* Reciprocity with other states is not offered, due to the minimal barriers to entry.
 - *Determine if an occupational exam is available to authorize practice:* An exam is not available or required for credentialing.
- **Officials:** VOCAL analysis of the credentialing process for referees, judges, and inspectors (collectively, “officials”) identified streamlining opportunities. Specifically, rule currently requires a minimum number of years of experience in order to be licensed as an official, with the number of years varying depending on the type of official license being sought. Based on this, the Combative Sports Commission has opened rulemaking to adopt a rule to credit towards licensure requirements any experience gained while an individual served in the military. See Exhibit 3(A) below for the draft rule. Analysis results:
 - *Extent to which military training meets requirements to practice an occupation:* The occupation of combative sports officiating is not a formal occupation within the military. However, members of the military may officiate combative sports contests held at military installations, and such experience could be credited toward the minimum number of years required for licensure, as specified in the draft rule.
 - *Identify reciprocity measures with other states:* Applicants who have worked for at least one year as an official under the purview of another state’s athletic commission meet the qualifications for licensure in Colorado and may apply for licensure.
 - *Determine if an occupational exam is available to authorize practice:* An exam is not available or required for credentialing.

Exhibit 3(A)

DRAFT Rule Relating to Credit for Military Education, Training, or Experience

- I. An applicant for licensure may submit information about the applicant’s education, training, or experience acquired during military service. It is the applicant’s responsibility to provide timely and complete information for the Director’s review.
- II. In order to meet the requirements for licensure, such education, training, or experience must be substantially equivalent to the required qualifications that are otherwise applicable at the time the application is received by the Director.

- III. The Director will determine, on a case-by-case basis, whether the applicant's military education, training, or experience meet the requirements for licensure.
- IV. If the Director determines that the submitted military education, training, or experience only partially satisfies licensure requirements, the Director will advise the applicant on the amount and type of additional education, training, or experience that is required to qualify for licensure.
- V. Documentation of military experience may include, but is not limited to, Certificate of Release or Discharge from Active Duty (DD-214), Verification of Military Experience and Training (DD-2586), Military transcript, Training records, Evaluation reports, or Letters from Commanding Officers describing the applicant's practice as an official.

4. Fantasy Contest Operators

VOCAL analysis of the credentialing process for fantasy contest operators found no need for streamlining measures because these professions have minimal barriers to entry. Specifically, the only requirement for a registered fantasy contest operator is submission of a registration form, and the only requirements for a licensed fantasy contest operator is submission of an application and a background check. Analysis results:

- *Extent to which military training meets requirements to practice an occupation:* Military training is not applicable to credentialing requirements.
- *Identify reciprocity measures with other states:* Reciprocity with other states is not offered, due to the minimal barriers to entry.
- *Determine if an occupational exam is available to authorize practice:* An exam is not available nor required for credentialing.

5. Hearing Aid Providers

VOCAL analysis of the credentialing process for hearing aid providers identified streamlining measures related to applying military education, training, or experience towards licensure requirements. Specifically, the Office of Hearing Aid Provider Licensure (Office) promulgated two rules to streamline licensure for veterans.

- The Office promulgated Rule 10 (Credit for Military Education, Training, or Experience and Pathways to Licensure for Veterans and Members of the Military), which states that military education, training, or service that is substantially equivalent to that required in Colorado will be accepted towards the qualifications for licensure, upon submission of satisfactory evidence. This includes applying military education, training, or service towards the minimum training required (for original licensure applicants who do not have the required minimum education). See Exhibit 5(A) below for this rule.
- The Office promulgated a revised Rule 2 (Licensure by Endorsement), which states that military service that conforms to the scope of practice of hearing aid providers in Colorado shall be credited towards active practice requirements, when an applicant seeks to substitute active practice for minimum education requirements or the requirement to pass an exam or obtain an audiology certification. See Exhibit 5(B) below for this rule.

Once these rules are effective (anticipated in July 2019), DPO will publish the pathway to licensure for veterans on a new sub-page of the website of the Office of Hearing Aid Provider Licensure. Analysis results:

- *Extent to which military training meets requirements to practice an occupation:* Pursuant to the newly promulgated Rule 10, military education, training, or service may be credited towards the training minimum for original licensure applicants, upon submission of satisfactory evidence. Pursuant to the Office's revised Rule 2, military service within the scope of practice of hearing aid providers in Colorado shall be credited towards active practice requirements.
- *Identify reciprocity measures with other states:* While Colorado does not offer hearing aid provider licensure via reciprocity, applicants with a license from another jurisdiction can apply for a Colorado license by endorsement, pursuant to the Office's rules and regulations.
- *Determine if an occupational exam is available to authorize practice:* Colorado requires passing one of two occupational exams for licensure (unless active practice is substituting for an exam): National Competency Examination (NCE) offered by the National Board for Certification in Hearing Instrument Sciences (NBC-HIS) and the International Licensing Examination (ILE), developed by the International Hearing Society (IHS). Many other US jurisdictions also use one or both of these exams to authorize practice as a hearing aid provider.

Exhibit 5(A)

Rule 10: Credit for Military Education, Training, or Experience and Pathways to Licensure for Veterans and Members of the Military

The purpose of this Rule is to provide pathways to licensure for individuals with training, education, or experience gained during military service pursuant to sections 24-34-102(8.5) and 24-4-201 et seq., C.R.S.

- A. An applicant for licensure may submit information about the applicant's education, training, or experience acquired during military service. It is the applicant's responsibility to provide timely and complete information for the Director's review.
- B. In order to meet the requirements for licensure, such education, training, or experience must be substantially equivalent to the required qualifications that are otherwise applicable at the time the application is received by the Director.
- C. The Director will determine, on a case-by-case basis, whether the applicant's military education, training, or experience meet the requirements for licensure.
- D. Documentation of military experience, education, or training may include, but is not limited to, the applicant's Certificate of Release or Discharge from Active Duty (DD-214), Verification of Military Experience and Training (DD-2586), military transcript, training records, evaluation reports, or letters from commanding officers describing the applicant's practice.

- E. For applicants submitting military education, training, or experience when applying for original licensure under Rule 1(A)(2), but who do not have the degree specified in Rule 1(A)(2)(b):
1. Applicants must pass the examination specified in Rule 1(A)(2).
 2. If the Director determines that the submitted military education, training, or experience only partially satisfies the training requirement specified in Rule 1(A)(2)(a), the Director will advise applicants on the amount of additional training, education, or experience that will be required to qualify for licensure.

Exhibit 5(B)

Rule 2: Licensure by Endorsement

The purpose of this rule is to clarify licensure by endorsement requirements pursuant to section 12-5.5-203, C.R.S.

- A. To qualify for licensure by endorsement an applicant must:
1. Possess an active license in good standing to practice as a hearing aid provider in another state or territory of the United States or in a foreign country; and
 2. Present satisfactory proof to the Director that the active license in good standing issued required qualifications substantially equivalent to the qualifications for original licensure in Colorado.
- B. Substantially equivalent qualifications may be determined by the Director and may include the following:
1. Earned a degree with a concentration in hearing aid fitting and dispensing, or completed supervised training to do so, and
 2. Passed an acceptable entry-level examination or obtained a certificate of competency in hearing aid fitting and dispensing.
- C. The Director may consider substituting two (2) years of active practice in good standing as a hearing aid provider within the last five (5) years prior to the date of application in place of either B.1 or 2 above.
- D. Military service shall be credited towards the requirements of active practice of Part C of this Rule, if the military experience generally conforms to the scope of practice of hearing aid providers in Colorado as specified in section 12-5.5-103, C.R.S.

6. Medical (Anesthesiologist Assistants, Physicians, Physician Assistants)

- **Anesthesiologist Assistants:** VOCAL analysis determined that the military does not utilize anesthesiologist assistants and, thus, that streamlining measures are not necessary. Analysis results:
 - *Extent to which military training meets requirements to practice an occupation:* The military does not utilize anesthesiologist assistants, thus military training does not apply towards licensure requirements.
 - *Identify reciprocity measures with other states:* Colorado does not reciprocate or endorse other states' anesthesiologist assistant licenses. That said, the requirements for licensure in other states are substantially the same as Colorado's requirements,

which means that veterans with a license from another state should be able to obtain a Colorado license.

- *Determine if an occupational exam is available to authorize practice:* The Certifying Examination for Anesthesiologist Assistants, offered by the National Commission for Certification of Anesthesiologist Assistants, authorizes practices in Colorado as well as in the other states that license this profession.
- **Physicians and Physician Assistants:** VOCAL analysis of the physician and physician assistant application processes identified streamlining measures related to applying military education, training, or experience towards licensure requirements. To streamline the application process for veterans, the Colorado Medical Board (Board), began the rulemaking process for one draft rule and began consideration of one draft policy.
 - The Board opened rulemaking for a draft rule related to Education, Training, or Experience Gained during Military Service. Section 1 of this draft rule states that military education, training, or service that is substantially equivalent to that required in Colorado will be accepted towards the qualifications for licensure, upon submission of satisfactory evidence. Section 2 of this draft rule specifies that the practice of medicine while on active duty shall be credited towards the minimum practice requirements for licensure as a physician. Section 3 of this draft rule specifies that the practice as a physician assistant while on active duty shall be credited towards the minimum practice requirements for licensure as a physician assistant. See Exhibit 6(A) below for this draft rule.
 - The Board began consideration of a draft policy related to the Physician Licensure Endorsement Process, which lays out the requirements for licensure by endorsement for physicians. This draft policy also states that the practice of medicine as part of military service shall be credited towards active practice requirements for endorsement applicants and that only an attestation of this experience is required for the application. Since the military requires licensure to practice medicine, it is anticipated that many physicians applying for Colorado licensure hold a license to practice medicine in another jurisdiction and thus would be applying for licensure by endorsement (other physicians may apply through the Interstate Medical Licensure Compact (IMLC), as applicable). See Exhibit 6(B) below for this draft policy.

Analysis results:

- *Extent to which military training meets requirements to practice an occupation:* Pursuant to the draft rule, practice as a physician assistant or the practice of medicine in the military shall be credited towards the minimum practice requirements for licensure. More generally, if the proposed rule is adopted, military education, training, or service that is substantially equivalent to that required in Colorado will be accepted towards the qualifications for licensure, upon submission of satisfactory evidence.

- *Identify reciprocity measures with other states:*
 - Physician Assistants: Colorado does not reciprocate or endorse other states' physician assistant licenses. That said, the requirements for licensure in other states are substantially the same as Colorado's requirements, which means that veterans with a license from another state should be able to obtain a Colorado license.
 - Physicians: Colorado does not offer physician licensure reciprocity, however there are two ways that applicants already licensed in another jurisdiction can obtain authorization to practice in Colorado. First, Colorado is part of the IMLC, which means that physicians, including veterans, who hold a compact license are provided an expedited pathway to licensure in Colorado. Currently, there are 29 US jurisdictions that participate in the IMLC. Second, physicians with licenses from other jurisdictions or physicians who hold a non-compact license from one of the 29 IMLC member states may apply for licensure by endorsement. The process for endorsement, including how practice in the military may apply towards requirements, is described in the draft policy.
- *Determine if an occupational exam is available to authorize practice:*
 - Physician Assistants: The Physician Assistant National Certifying Exam (PANCE), offered by the National Commission on Certification of Physician Assistants, authorizes practices in Colorado and all other US states. While not all branches of the military require passage of the PANCE to practice, individuals who have met the education requirements for practicing in the military are eligible to take the PANCE.
 - Physicians: The United States Medical Licensing Examination (USMLE) authorizes practice as a Medical Doctor (M.D.) in all US jurisdictions, including Colorado. The Comprehensive Osteopathic Medical Licensing Examination of the United States of America (COMLEX-USA) authorizes practice as a Doctor of Osteopathy (D.O.) in all US jurisdictions, including Colorado. Other exams may also authorize practice in various jurisdictions, including in Colorado, but passage of the USMLE or the COMLEX-USA would satisfy exam requirements across all US jurisdictions.

Exhibit 6(A)

DRAFT Rule Relating to Education, Training, or Service Gained during Military Service

Basis: The authority for promulgation of these rules and regulation by the Colorado Medical Board ("Board") is set forth in sections 24-34-102(8.5), 12-36-104(1)(a), 12-36-107(1)(e)(I)(C), 12-36-114.5, 12-36-116(1)(d), 12-36-137, 24-34-102(8)(d), Colorado Revised Statutes.

Purpose: The following rules and regulations have been adopted by the Board to implement the requirements set forth in section 24-34-102(8.5), C.R.S. and to otherwise streamline licensure for applicants with relevant military education, training, or experience, pursuant to Colorado House Bill 16-1197.

SECTION 1: CREDIT FOR MILITARY EDUCATION, TRAINING, OR EXPERIENCE.

- A. An applicant for licensure may submit information about the applicant's education, training, or experience acquired during military service. It is the applicant's responsibility to provide timely and complete information for the Board's review.
- B. In order to meet the requirements for licensure, such education, training, or experience must be substantially equivalent to the required qualifications that are otherwise applicable at the time the application is received by the Board.
- C. The Board will determine, on a case-by-case basis, whether the applicant's military education, training, or experience meet the requirements for licensure.
- D. Documentation of military experience, education, or training may include, but is not limited to, the applicant's Certificate of Release or Discharge from Active Duty (DD-214), Verification of Military Experience and Training (DD-2586), military transcript, training records, evaluation reports, or letters from commanding officers describing the applicant's practice.

SECTION 2: MILITARY EXPERIENCE AS DEMONSTRATION OF CONTINUED COMPETENCY FOR PHYSICIAN LICENSURE

- A. The practice of medicine while an applicant is on active military duty shall be credited towards the requirements for demonstrating continued competency for physician licensure, reinstatement, or reactivation of a license.
- B. Applicants with relevant military experience must otherwise comply with statutory requirements and the processes and requirements of Rule 120.

SECTION 3: MILITARY EXPERIENCE AS DEMONSTRATION OF CONTINUED COMPETENCY FOR PHYSICIAN ASSISTANT LICENSURE

- A. Practice as a physician assistant while an applicant is on active military duty shall be credited towards the requirements for demonstrating continued competency for physician assistant licensure, reinstatement, or reactivation of a license.
- B. Applicants with relevant military experience must otherwise comply with statutory requirements and the processes and requirements of Rule 410.

Exhibit 6(B)

DRAFT Policy related to the Physician Licensure Endorsement Process

Purpose: The following policy has been adopted by the Board to clarify the process of licensure by endorsement of physicians.

Policy: To qualify for a physician license by endorsement, applicants must meet all requirements outlined in statute and the rules and policies of the Colorado Medical Board, including, but not limited to, section 12-36-107, C.R.S. and Rule 120.

Physicians applying for licensure by endorsement shall:

1. Attest to information on all current or previous licenses to practice medicine in other jurisdictions, including each license's jurisdiction, status, number, year of issuance, and whether any disciplinary action has been taken against the license.
2. Provide verification of one full and unrestricted physician license that is substantially equivalent to Colorado's.
 - a. For another jurisdiction's physician license to be endorsed in Colorado, that jurisdiction must require qualifications substantially equivalent to the qualifications for licensure in Colorado, as specified in statute.
 - b. The Board deems that full and unrestricted physician licenses issued by US states and territories, including the District of Columbia, are substantially equivalent to Colorado's and thus are eligible for endorsement.
 - c. The Board will review licenses from other jurisdictions on a case-by-case basis to determine substantial equivalency.
3. Provide a self-query report from the National Practitioner Data Bank (NPDB).
4. Attest to medical school/college and degree information.
5. Attest to passing scores on one of the following: the Medical National Boards, Osteopathic National Boards, FLEX, USMLE, LMCC, or State Written Exam.
6. Attest to completion of an internship or post-graduate training.
7. Provide a Physician Initiated Profile Request (provided via the Federation of State Medical Boards).
8. Attest to holding malpractice insurance.
9. Attest to the applicant's practice of medicine in five (5) of the last seven (7) years. The attestation includes practice descriptions and dates of employment/practice covering the last 7 (seven) years.
 - a. As applicable, the practice of medicine in the military may be included in this attestation, pursuant to [the proposed draft rule].

Additionally, the Board's Licensing Panel may require additional information or documentation on a case-by-case basis.

This policy does not apply to Physicians applying for licensure in Colorado via the Interstate Medical Licensure Compact.

7. Occupational Therapists and Occupational Therapy Assistants

VOCAL analysis of the credentialing process for occupational therapists and occupational therapy assistants identified streamlining measures. Specifically, the Office of Occupational Therapy (Office) promulgated a revised rule to streamline the licensure process for veterans and document the pathways to licensure.

- The Office promulgated a revised Rule 14, with the revisions documenting the pathways to occupational therapist and occupational therapy assistant licensure for veterans and members of the military. This rule also streamlines licensure by: 1) allowing veterans a longer time period in which to have gained the minimum hours of practice required for licensure by endorsement, and 2) allowing a waiver of a requirement that the exam was passed in the last two years, for veterans who regularly practiced in the military since they passed the exam. See Exhibit 7(A) below for this rule.

Once these rules are effective (anticipated in July 2019), DPO will publish the pathway to licensure for veterans on a new sub-page of the website of the Office of Occupational Therapy. Analysis results:

- *Extent to which military training meets requirements to practice an occupation:* Pursuant to current rule, military training, education, or experience that is substantially equivalent to that required in Colorado will be accepted towards the qualifications for licensure, upon submission of satisfactory evidence. Additionally, pursuant to the Office's revised Rule 14, military training, education, or experience may be applied towards active practice minimums for licensure by endorsement. Further, pursuant to the revised Rule 14, the Office may waive the expiration date of test scores based on an applicant's military practice history.
- *Identify reciprocity measures with other states:* While Colorado does not offer occupational therapist or occupational therapy assistant licensure via reciprocity, applicants with a license from another jurisdiction can apply for a Colorado license by endorsement, pursuant to the Office's rules and regulations.
- *Determine if an occupational exam is available to authorize practice:* For licensure as either an occupational therapist or occupational therapy assistant, applicants must pass the National Board for Certification in Occupational Therapy (NBCOT) exam. This exam is required by all other US jurisdictions for licensure as an occupational therapist, and the military also requires passing this exam to practice as an occupational therapist. Also, many US jurisdictions require passing this exam to practice as an occupational therapy assistant.

Exhibit 7(A)

Rule 14: Credit for Military Experience and Pathways to Licensure for Veterans and Members of the Military (§24-34-102(8.5) and 24-4-201 et seq., C.R.S.)

- A. An applicant for licensure may submit information about the applicant's education, training, or experience acquired during military service. It is the applicant's responsibility to provide timely and complete information for the Director's review.
- B. In order to meet the requirements for licensure, such education, training, or experience must be substantially equivalent to the required qualifications that are otherwise applicable at the time the application is received by the Director.
- C. The Director will determine, on a case-by-case basis, whether the applicant's military education, training, or experience meet the requirements for licensure.

- D. Documentation of military experience to satisfy requirements in Rule 1, Rule 2, or section (E) of this Rule may include, but is not limited to, the applicant's Certificate of Release or Discharge from Active Duty (DD-214), Verification of Military Experience and Training (DD-2586), military transcript, training records, evaluation reports, or letters from commanding officers describing the applicant's practice as an occupational therapist and/or an occupational therapy assistant.
- E. Pathways to occupational therapist licensure or occupational therapy assistant licensure for veterans and members of the military may include:
1. Veteran or military applicants with a current, valid license or registration as an occupational therapist or an occupational therapy assistant from another jurisdiction shall apply for licensure by endorsement, as described in Rule 2 for occupational therapist applicants or as described in Rule 11 for occupational therapy assistant applicants.
 - a. If the occupational therapist applicant does not meet any of the competency requirements as specified in Rule 2(B), the Director will evaluate whether the applicant's military service otherwise demonstrates the applicant has maintained competency as an occupational therapist, pursuant to Rule 2(B)(1). For this evaluation, the Director, in her discretion, may determine that an applicant has maintained competency if the applicant has actively practiced occupational therapy in the military for at least 400 hours in the two (2) years immediately preceding the date of application.
 - b. If the occupational therapy assistant applicant does not meet any of the competency requirements as specified in Rule 11(D)(2), the Director will evaluate whether the applicant's military service otherwise demonstrates the applicant has maintained competency as an occupational therapy assistant, pursuant to Rule 11(D)(2)(a). For this evaluation, the Director may determine that an applicant has maintained competency if the applicant actively practiced as an occupational therapy assistant in the military for at least 400 hours in the three (3) years immediately preceding the date of application.
 2. Veteran or military applicants who do not hold a current, valid license or registration as an occupational therapist or occupational therapy assistant from another jurisdiction shall apply for licensure by examination, as described in Rule 1 for occupational therapist applicants or as described in Rule 10 for occupational therapy assistant applicants.
 - a. If the occupational therapist applicant's passing score on the required examination was not achieved in the time frame specified in Rule 1(D)(1), but the occupational therapist applicant has practiced occupational therapy in the military on a regular basis since passing the examination, with no single gap in practice of more than two (2) years, then the Director may waive the time limitation in Rule 1(D)(1), pursuant to the authority granted in Rule 1(D)(2)(c).

b. Occupational therapy assistant applicants must:

1. Meet the education requirements of section 12-40.5-106.5(1), C.R.S., and Rule 10(B); and
2. Pass an examination as outlined in section 12-40.5-106.5(3), C.R.S., and Rule 10(C). If the occupational therapy assistant applicant's passing score on the required examination was not achieved in the time frame specified in Rule 10(D)(2), but the occupational therapy assistant applicant has practiced as an occupational therapy assistant in the military on a regular basis since passing the examination, with no single gap in practice of more than two (2) years, then the Director may waive the time limitation in Rule 10(D)(2), pursuant to authority granted in Rule 10(D)(3)(c).

8. Optometry

VOCAL analysis found that the military requires licensure for practice as an optometrist, which means that veterans should be able to apply for licensure by endorsement of another jurisdiction's license. VOCAL analysis identified streamlining measures related to the endorsement application requirements for veterans and members of the military, and the State Board of Optometry (Board), began consideration of a draft policy related to identified opportunities (see Exhibit 8(A) below for this draft policy). The draft policy:

- Clarifies that military practice as an optometrist can be applied towards the minimum amount of months of active practice required (24 months).
- Expands the time frame that applicants using military experience have to gain the required 24 months of recent active practice (from 24 months to 36 months).

Analysis results:

- *Extent to which military training meets requirements to practice an occupation:* Pursuant to a previously-adopted Board rule (Rule 19), military training, education, or experience that is substantially equivalent to that required in Colorado will be accepted towards the qualifications for licensure, upon submission of satisfactory evidence. Pursuant to the draft policy, military service as an optometrist shall be credited towards active practice requirements, and the time allowed to veterans for gaining the minimum amount of active practice will be extended to 36 months.
- *Identify reciprocity measures with other states:* While Colorado does not offer optometrist licensure via reciprocity, applicants with a license from another jurisdiction can apply for a Colorado license by endorsement, pursuant to the Board's rules and regulations.
- *Determine if an occupational exam is available to authorize practice:*
 - The National Board of Examiners in Optometry offers a national occupational exam that authorizes practice. Colorado and all other US jurisdictions require passage of Part I and Part II of this exam. Many US jurisdictions, including Colorado, also require passage of Part III, as well as a supplementary exam, the Treatment & Management of Ocular Disease (TMOD) supplemental exam.

- To address endorsement applications where a podiatrist may have been licensed to practice in another jurisdiction without passing Part III or the TMOD supplemental exam, the Board recently began consideration of a draft policy (see Exhibit 8(B) below for this draft policy), which allows for the Board to evaluate, on a case-by-case basis, whether such applicants can be licensed in Colorado without passage of Part III or the TMOD supplemental exam, based on their education, training, or practice experience (which would include military education, training, or experience).

Exhibit 8(A)

DRAFT Policy: Guidance for veterans and members of the military applying military service towards endorsement licensure qualifications

Purpose: To provide guidelines and clarification on State Board of Optometry Rule 11 (endorsement) and Rule 19 (military experience), with respect to Board expectations for applying military service towards endorsement licensure qualifications.

Proposed Language:

The practice of optometry in the military shall apply towards the minimum requirements for active engagement in the practice of optometry specified in Rule 11, Part D.

The Board may accept active engagement in the practice of optometry in the military for 24 of the 36 months immediately preceding the application for licensure by endorsement as demonstration of competency of an optometrist, under the authority granted to the Board in Rule 11, Part E.

Documentation of military experience, education, or training may include, but is not limited to, the applicant's Certificate of Release or Discharge from Active Duty (DD-214), Verification of Military Experience and Training (DD-2586), military transcript, training records, evaluation reports, or letters from commanding officers describing the applicant's practice as an optometrist. Documentation must conform with State Board of Optometry Rule 19 (military experience).

Exhibit 8(B)

DRAFT Policy: Exam Requirements for Endorsement Applicants

Purpose: To provide guidelines and clarification with respect to Board expectations for exam requirements for endorsement under State Board of Optometry Rule 11 and section 12-40-108, C.R.S..

Proposed Language: The Board will determine, on a case-by-case basis, whether to approve an endorsement application for an optometrist seeking endorsement of their license into Colorado if the applicant has not passed the Treatment and Management of Ocular Disease (TMOD) section of the National Board of Examiners in Optometry (NBEO) exam or Part III (Clinical Skills) of the NBEO exam. When making such determination, the Board will consider such factors as the optometrist's length and type of practice, relevant continuing education courses, and relevant courses completed as part of the applicant's course of study at a school of optometry.

9. Pharmacists

VOCAL analysis of the credentialing process for pharmacists found no need for streamlining measures because the requirements for practice in the military qualify veterans for licensure in Colorado. Specifically, the military requires licensure in a US jurisdiction and such licenses are eligible for transfer to Colorado, if the applicant has passed a statutorily-required jurisprudence exam and has held that license for at least one year. DPO published the pathway to licensure for veterans on a new [sub-page of the website of the State Board of Pharmacy](#) (see Exhibit 9(A) below). Analysis results:

- *Extent to which military training meets requirements to practice an occupation:* Pursuant to a previously-adopted State Board of Pharmacy (Board) rule (Rule 4.00.30(e)), military training, education, or experience that is substantially equivalent to that required in Colorado will be accepted towards the qualifications for licensure, upon submission of satisfactory evidence. It is anticipated, though, that veteran applicants who practiced as a pharmacist in the military will be able to transfer their license to Colorado.
- *Identify reciprocity measures with other states:* Pharmacist licenses from other US jurisdictions are eligible for transfer to Colorado, pursuant to the rules, regulations, and policies of the Board. The Board recently adopted a policy to clarify that transfers are available to not only licenses from US states, but also from the District of Columbia and US territories. This policy is important to veterans since holding a pharmacist license from the District of Columbia or a US territory would qualify a pharmacist for practice in most branches of the military.
- *Determine if an occupational exam is available to authorize practice:* The North American Pharmacist Licensure Examination (NAPLEX), offered by the National Association of Boards of Pharmacy, authorizes practices in all US jurisdictions.

Exhibit 9(A): Published Pathway to Pharmacist Licensure for Veterans

State Board of Pharmacy: Military/Veteran Information

The pathway to licensure for individuals who practiced as a pharmacist in the military and who currently hold a pharmacist license (in good standing) from another US state or jurisdiction is through the license transfer (endorsement) process. Requirements:

- **Current License(s):** Applicants must hold an active pharmacist license in another US state or territory, or the District of Columbia. This license must be active for at least one year prior to application (unless applicants meet internship requirements).
- **Pass the Multistate Pharmacy Jurisprudence Examination (MPJE):** Applicants must take and pass this examination. To register for the examination, applicants must complete an eligibility form on the National Association of Boards of Pharmacy (NABP) website (more info at [this link](#)).
- **Submit an Application:** For license transfer, applicants must submit a preliminary application for license transfer to NABP via the Electronic Licensure Transfer Program, or “e-LTP” (more info at [this link](#)). Once the Preliminary Application is approved by NABP, the applicant will receive an Official Application.

The NABP offers most veterans, members of the military, and military spouses discounts on the fees required for the MPJE and the e-LTP application (more info on discounts at [this link](#)).

For detailed licensure requirements for all applicants, including for applicants seeking original licensure by way of examination, please review:

- [Pharmacist Application Checklist](#)
- [Rule 4: Licensure, See particularly:](#)
 - Rule 4.00.40: Requirements for License Transfer or Endorsement.
 - Rule 4.00.30(e), related to pharmacist service, training, and education obtained in the military, which states: Education, training, or service gained in military services outlined in C.R.S. 24-34-102(8.5), to be accepted and applied towards receiving a license, must be substantially equivalent, as determined by the Board, to the qualifications otherwise applicable at the time of receipt of application. It is the applicant's responsibility to provide timely and complete evidence for review and consideration. Satisfactory evidence of such education, training, or service will be assessed on a case by case basis.
- [Section 20 - Licensure Policies](#)

Other helpful information for veterans and members of the military can be found on DORA's main [Military and Veterans Programs site](#).

If you have questions on licensing of veterans or members of the military as pharmacists, please contact Laura.Bravo@state.co.us

10. Podiatry

VOCAL analysis found that the military requires licensure for practice as a podiatrist, which means that veterans should be able to apply for licensure by endorsement of another jurisdiction's license. VOCAL analysis of the podiatrist application process, including for endorsement applications, identified streamlining measures related to applying military education, training, or experience towards licensure requirements. To streamline the application process for veterans, the Colorado Podiatry Board (Board), promulgated one rule and adopted one policy.

- The Board promulgated Rule 100(1.3) - Credit for Military Education, Training, or Experience, which states that military education, training, or service that is substantially equivalent to that required in Colorado will be accepted towards the qualifications for licensure, upon submission of satisfactory evidence. See Exhibit 10(A) for this rule below.

- The Board adopted Policy 20-6 - Guidance for veterans and members of the military applying military service towards endorsement licensure qualifications, which states that the practice of podiatry as part of military service shall be credited towards active practice requirements for endorsement applicants. This policy also specifies that the Board may, on a case-by-case basis, determine that military or veteran applicants who do not meet the minimum active practice requirements for licensure have otherwise demonstrated their continued competence and thus may be licensed. See Exhibit 10(B) for this policy below.

Once these rules are effective (anticipated in August 2019), DPO will publish the pathway to licensure for veterans on a new sub-page of the website of the Colorado Board of Podiatry. Analysis results:

- *Extent to which military training meets requirements to practice an occupation:* Pursuant to the newly promulgated Rule 100(1.3), military education, training, or service may be credited towards the training minimum for licensure applicants, upon submission of satisfactory evidence. Additionally, pursuant to the Board's new Policy 20-6, military service as a podiatrist shall be credited towards active practice requirements.
- *Identify reciprocity measures with other states:* While Colorado does not offer podiatrist licensure via reciprocity, applicants with a license from another jurisdiction can apply for a Colorado license by endorsement, pursuant to the Board's rules, regulations, and policies.
- *Determine if an occupational exam is available to authorize practice:* The American Podiatric Medical Licensing Examination is a national occupational exam that authorizes practice. Colorado and all other US jurisdictions require passage of Part I and Part II of this exam. Many states, including Colorado, also require passage of Part III, though applicants for Colorado licensure who have not passed Part III may apply for a waiver of the requirement to pass Part III on the basis of their education, training, or practice experience (which would include military education, training, or experience), pursuant to a rule recently adopted by the Board.

Exhibit 10(A)

Rule 100(1.3) - Credit for Military Education, Training, or Experience

The purpose for the promulgation of this Rule is to satisfy the requirement of section 24-34-102(8.5), C.R.S., related to applying military education, training, and experience to qualifications for licensure.

- A. An applicant for licensure may submit information about the applicant's education, training, or experience acquired during military service. It is the applicant's responsibility to provide timely and complete information for the Board's review.
- B. In order to meet the requirements for licensure, such education, training, or experience must be substantially equivalent to the required qualifications that are otherwise applicable at the time the application is received by the Board.
- C. The Board will determine, on a case-by-case basis, whether the applicant's military education, training, or experience meet the requirements for licensure.

- D. Documentation of military experience, education, or training may include, but is not limited to, the applicant's Certificate of Release or Discharge from Active Duty (DD-214), Verification of Military Experience Training (DD-2586), military transcript, training records, evaluation reports, or letters from commanding officers describing the applicant's practice.

Exhibit 10(B)

Policy 20-6 - Guidance for veterans and members of the military applying military service towards endorsement licensure qualifications

Purpose: To provide guidelines and clarification on the Colorado Podiatry Board's Rule 100(1.2) - Licensure by Endorsement - and Rule 100(1.3) - Credit for Military Education, Training, or Experience - with respect to Board expectations for applying military service towards endorsement licensure qualifications.

Policy: The practice of podiatry as part of military service shall be credited toward active practice requirements set in Rule 100(1.2), sub-parts (G) and (H).

If a military or veteran applicant for endorsement does not fulfill the minimum active practice requirements set out in Rule 100(1.2)(G) and Rule 100(1.2)(H), the Board will evaluate, on a case-by-case basis, the educational, training, and practice history of the applicant - including all military training, service, or education related to the applicant's practice of podiatry - to determine if there exists an alternative method by which the applicant has demonstrated continued competence.

- If, pursuant to the discretion granted to the Board in Rule 100(1.2)(H), the Board determines the applicant has otherwise fulfilled the active practice requirement, and the applicant satisfies all other requirements in statute, rule, and policy, then the Board may approve the applicant for licensure.
- If the Board determines the applicant cannot satisfactorily fulfill the active practice requirement, the Board shall specify the evaluation, education, training and/or monitoring that is required in order for the applicant to be licensed, pursuant to Rule 100(1.2)(I).

Documentation must conform with the Colorado Podiatry Board's Rule 100(1.3) - Credit for Military Education, Training, or Experience.

11. Veterinary Medicine (Veterinarians)

VOCAL analysis of the credentialing process for veterinarians found no need for streamlining measures because licensing of veterinarians with military experience has already been streamlined. Specifically, VOCAL analysis found that the military requires veterinarians to have a doctorate degree from an accredited veterinary school and to be licensed in a US jurisdiction, which, in turn, requires passing of the North American Veterinary Licensing Examination (NAVLE). VOCAL analysis also found that licensure in Colorado requires a doctorate degree from an accredited veterinary school (or other approved school), passing of the NAVLE, and demonstration of current clinical competency and professional ability. To address Colorado's requirements, the Board of Veterinary Medicine (Board) previously adopted two rules specific to those who practiced

veterinary medicine in the military.

- Rule II(A)(16): military education, training, or service that is substantially equivalent to that required in Colorado will be accepted towards the qualifications for licensure, upon submission of evidence satisfactory to the Board.
- Rule II(B)(2)(c)(v): the requirement for maintaining current clinical competency and professional ability, as required for licensure, may be satisfied through being “engaged in service as a veterinarian in the military for at least 3 years of the 5 years immediately preceding the date the application is received.”

Based on the current licensure qualifications and requirements in Colorado and the military, paired with the rules previously adopted by the Board, licensure as a veterinarian in Colorado is already fully streamlined. DPO published the pathway to licensure for veterans on a new [sub-page of the website of the Board of Veterinary Medicine](#) (see Exhibit 11(A) below). Analysis results:

- *Extent to which military training meets requirements to practice an occupation:* As specified in Rule, military education, training, or service that is substantially equivalent to that required in Colorado will be accepted towards the qualifications for licensure, upon submission of evidence satisfactory to the Board. Further, military practice satisfies Colorado’s requirement for maintaining current clinical competency and professional ability.
- *Identify reciprocity measures with other states:* While Colorado does not offer veterinarian licensure via reciprocity, applicants with a license from another jurisdiction can apply for a Colorado license by endorsement, pursuant to the Board’s rules and regulations.
- *Determine if an occupational exam is available to authorize practice:* Currently, the North American Veterinary Licensing Examination (NAVLE), administered by the National Board of Veterinary Medical Examiners (NBVME), must be passed in order to gain licensure in Colorado and in all other US jurisdictions.

Exhibit 11(A): Published Pathway to Veterinarian Licensure for Veterans

Board of Veterinary Medicine: Military/Veteran Licensing

The pathway to licensure for individuals who practiced as a veterinarian in the military and who currently hold a veterinarian license (in good standing) from another U.S. state or jurisdiction, involves the submission of an endorsement application. Requirements:

- **Current License(s):** Applicants must provide verification of licensure from all U.S. states or jurisdictions in which the applicant is currently, or has previously been, licensed as a veterinarian.
- **Education:** Applicants must provide an official transcript demonstrating a Doctor of Veterinary Medicine degree from an accredited or approved school.
- **Exam:** Applicants must provide proof of passing the North American Veterinary Licensing Examination (NAVLE), or its predecessor exams.
- **Current Clinical Competency & Professional Ability:** Applicants must demonstrate current clinical competency and professional ability. There are various ways to satisfy this requirement, and all options are all listed in [Rule II, Part B\(2\)\(c\) of the State Board of Veterinary Medicine's Rules & Regulations](#).
 - **Military Practice as a Veterinarian:** One option for demonstrating current clinical competency and professional ability is through the applicant's practice as a veterinarian in the military. For this option, applicants attest to their engagement in service as a veterinarian in the military for at least three years of the five years immediately preceding the date of application (Rule II, Part B(2)(c)(v)).

More generally, the State Board of Veterinary Medicine has adopted [Rule II, Part A\(16\)](#), related to veterinary service, training, and education obtained in the military, which is as follows:

Education, training, or service gained in military services outlined in [C.R.S. 24-34-107\(8.5\)](#), to be accepted and applied towards receiving a license, must be substantially equivalent, as determined by the Board, to the qualifications otherwise applicable at the time of receipt of application. It is the applicant's responsibility to provide timely and complete evidence for review and consideration. Satisfactory evidence of such education, training or service will be assessed on a case by case basis.

For detailed licensure requirements for all applicants, including for applicants seeking original licensure by way of examination, please review:

- [Veterinarian Application Checklist](#)
- [Rule II: Licensure & Application Provisions](#)

Other helpful information for veterans and members of the military can be found on DORA's main [Military and Veterans Programs site](#).

Appendix A. Board of Nursing: Military/Veteran Licensing webpage

Board of Nursing: Military/Veteran Licensing

The Board of Nursing - as part of the Division's Veterans Occupational Credentialing And Licensing (VOCAL) program -- has adopted policies/rules to assist veterans with relevant military training to obtain a license or certification in a streamlined manner. Veterans seeking a license or certification with these streamlined policies/rules should expect a personalized evaluation of their application and professional advice regarding the most direct path to obtaining their Colorado credentials.

Overview of licensing and certification for veterans with military training are as follows:

1. Please gather all documentation/transcripts to verify education, training and/or experience in the healthcare field.
2. Upload the information to the Board of Nursing for evaluation. Please send this documentation to Roberta.Hills@state.co.us.
3. Potential applicants will be notified by email on further documentation or steps necessary to apply for nursing licensure.
4. The Board will supply support and inform the potential application of any missing requirements or "gaps" that exists that may need to be filled.

For questions about the streamlined policies/rules or to begin the process, please contact Roberta.Hills@state.co.us.

Other helpful information for veterans can be found on DORA's main [Military and Veterans Programs site](#).

Read the full text of the rules that have been adopted for veterans here:

- [LPNs, RNs \(Chapter 1\)](#)
- [Licensed Psychiatric Technicians \(Chapter 5\)](#)
- [Certified Nurse Aides \(Chapter 10\)](#)
- [Certified Nurse Aides-Medication Aide Authority \(Chapter 19\)](#)

Read the full text of the policies that have been adopted for veterans here:

- [LPNs \(Policy 10-10\)](#)
- [RNs \(Policy 10-12\)](#)
- [Licensed Psychiatric Technicians \(Policy 10-14\)](#)
- [Certified Nurse Aides-Medication Aide Authority \(Policy 10-13\)](#)