



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 30, 2020



COLORADO

**Department of
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). This Bill 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 completed analysis and streamlining, where applicable, for nine (9) professions, while analysis and streamlining for an additional two (2) professions is pending. Analysis and streamlining efforts resulted in the adoption of one (1) new board rule, as well as two (2) pending DPO Director rules, to streamline the granting of occupational credentials to veterans based on military training or experience. The two pending rules have a presumed effective date of July 15, 2020. VOCAL analyses completed in Fiscal Year 2019 also resulted in the adoption this year of three (3) new board policies and two (2) new board rules, for five (5) professions.

Finally, DPO’s VOCAL program has seen tangible, quantifiable success. This includes the licensure of five (5) nurses and nurse aides 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 considering our report.

Respectfully,

A handwritten signature in cursive script, appearing to read "Ronne Hines".

Ronne Hines
Director
Division of Professions and Occupations
Department of Regulatory Agencies

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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.

Building on its work over the last three years, DPO conducted VOCAL analysis for eleven (11) professions this year including, acupuncture, athletic trainer, chiropractor, direct-entry midwife, massage therapist, naturopathic doctor, nursing home administrator, outfitter, private investigator, respiratory therapist, and speech-language pathologist.

Additionally, VOCAL analyses completed in Fiscal Year 2019 resulted in the adoption of policies and rules for five (5) professions in Fiscal Year 2020 including, certified public accountant, combative sports official, physician, physician assistant, and optometrist.

Analysis Requirements

In conducting the VOCAL analyses, DPO applied the five key elements 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 examination 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 examination.

Highlights

- **Analysis Results**
 - DPO boards completed the rulemaking and policy adoption processes for two (2) new board rules and three (3) new board policies, as related to five (5) professions for which analysis began in Fiscal Year 2019, including: certified public accountants, combative sports officials, physician assistants, physicians, and optometrists.
 - Through completed VOCAL analyses, opportunities for streamlining were identified

for athletic trainers, nursing home administrators, and outfitters. DPO staff and the Board of Examiners of Nursing Home Administrators completed the rulemaking adoption processes for one (1) new rule and the Director adopted two (2) rules, one pertaining to outfitters and the other to athletic trainers. The two (2) Director rules, while adopted in Fiscal Year 2020, have a presumed effective date of July 15, 2020.

- VOCAL analysis of acupuncturists, chiropractors, direct-entry midwives, massage therapists, naturopathic doctors, private investigators, respiratory therapists, and speech-language pathologists found that no streamlining was necessary.
- **Pathways to Licensure, Certification, or Registration.** DPO added new pages to the websites of the State Board of Optometry, Colorado Podiatry Board, Board of Accountancy, Colorado Medical Board, Office of Occupational Therapy, Office of Audiology Licensure, and Office of Hearing Aid Provider Licensure, to clearly document the pathway(s) available to veterans to obtain authorization to practice, in conformance with HB 16-1107 (Section 24-4-303(1)(a), C.R.S.) to document pathways to licensure.
- **Stakeholder Involvement, Outreach, and Communications**
 - DPO’s “Veterans & Military Advisory Committee”, which includes representatives from state and federal agencies and non-profit organizations, met twice in Fiscal Year 2020. This Committee provides DPO with guidance on the development of occupational licensing policies/rules for veterans and members of the military community and provides 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 may take full advantage of the available opportunities.
 - DPO staff provided updates on the VOCAL program, and other programs for members of the military and military spouses, to two (2) boards. As applicable, these boards also provided input on the analyses conducted for the professions under their corresponding purviews.
 - DPO staff provided program information to, and developed partnerships with, various organizations, including the Air Force Academy, the Northern Colorado Veteran Resource Center, the College of Health Science and Administration at Emily Griffith Technical College, Front Range Community College - Larimer, US Department of Labor’s Veterans’ Employment & Training Services, Fort Carson, United Services Organizations (USO), Pikes Peak Workforce Center, and Schriever Air Force Base.
 - 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 and nurse aide 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 ten (10) veterans licensed as nurses and nurse aides in previous years, this brings the total nurses and nurse aides who have leveraged their prior military experience for licensure to fifteen (15), 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. The VOCAL policies eliminate these costs and delays for veterans entering this occupation who are found to have equivalent military training experience.

Conclusion and Next Steps

Fiscal Year 2020 was a success for DPO's VOCAL program. With the adoption of one (1) new board rule, and two (2) 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 and nurse aides who successfully became licensed through streamlined Board of Nursing policies.

In the next fiscal year, DPO plans to wrap up implementation of HB 16-1197 by completing analysis for a newly regulated profession in 2020. Additionally, in the next fiscal year, DPO plans to further promote 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 HB 16-1197 (HB16-1197) 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 requires “[e]ach 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 conformance with this 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.

In Fiscal Year 2017, DPO identified the following professions for initial VOCAL consideration: 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 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 illustrated in Table 2, DPO identified the following professions for VOCAL consideration in Fiscal Year 2018: 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, DPO identified the following professions for VOCAL consideration in Fiscal Year 2019: 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 | | | | | |

As shown in Table 4, in Fiscal Year 2020, DPO identified the following professions for VOCAL consideration: Acupuncture, Athletic Trainer, Chiropractor, Direct-Entry Midwife, Massage Therapy, Naturopathic Doctor, Nursing Home Administration, Outfitter, Private Investigator, Respiratory Therapy, and Speech-Language Pathology.

Table 4. Fiscal Year 2020 Veterans Occupational Credentialing and Licensing Professions

| Acupuncture | Athletic Trainer | Chiropractor | Direct-Entry Midwife | Massage Therapy | Naturopathic Doctor |
|------------------------------------|-------------------------|-----------------------------|-----------------------------|----------------------------------|----------------------------|
| Acupuncturist | Athletic Trainer | Chiropractor | Direct-Entry Midwife | Massage Therapist | Naturopathic Doctor |
| Nursing Home Administration | Outfitter | Private Investigator | Respiratory Therapy | Speech-Language Pathology | |
| Nursing Home Administrator | Outfitter | Private Investigator | Respiratory Therapist | Speech-Language Pathologist | |
| Administrator-in-Training | | | | | |

III. Analysis Requirements & Process

HB 16-1197 established specific criteria to be applied in each state agency's analysis in streamlining the granting of occupational credentials to veterans based on military training. Now codified, 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 examination 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 examination.

Utilizing the above criteria, DPO analyzed each of the professions and sub-professions listed in Tables 1-4 as follows:

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 for various professions, as well as successful stakeholder involvement and outreach efforts resulting in 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:

- DPO boards completed the rulemaking and policy adoption processes for two (2) new board rules and three (3) new board policies, as related to five (5) professions for which analysis began in Fiscal Year 2019, including:
 - Certified Public Accountants
 - Combative Sports Officials
 - Physician Assistants
 - Physicians
 - Optometrists
- Through completed VOCAL analyses, opportunities for streamlining were identified for athletic trainers, nursing home administrators, and outfitters. DPO staff and the Board of Examiners of Nursing Home Administrators completed the rulemaking adoption processes for one (1) new rule and the Director adopted two (2) rules, one pertaining to outfitters and the other to athletic trainers. The two (2) Director rules, while adopted in Fiscal Year 2020, have a presumed effective date of July 15, 2020.
- VOCAL analysis of acupuncturists, chiropractors, direct-entry midwives, massage therapists, naturopathic doctors, private investigators, respiratory therapists, and speech-language pathologists found that no streamlining was necessary.
 - *Professions for which no similar professional equivalency was found in the military:*
 - Chiropractor
 - Direct-Entry Midwife
 - Massage Therapist
 - Naturopathic Doctor
 - *Professions for which streamlining was already completed:*
 - Acupuncturist, since a previously adopted rule already allows licensure based on relevant military experience if military experience is substantially equivalent to that required in statute and rule for civilians.
 - Private Investigator, since a previously adopted rule already credits relevant military experience toward minimum licensure requirements.
 - Respiratory Therapist, since a previously adopted rule already credits relevant military experience toward minimum licensure requirements and relevant military training should qualify an applicant to sit for the national exam and obtain the national certification, which is required for licensure.
 - Speech-Language Pathologist, since a previously adopted rule already credits relevant military experience toward minimum licensure requirements.

Pathways to Licensure, Certification, or Registration. DPO added new pages to the websites of seven (7) 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 pages for the following programs/boards:

- [Board of Accountancy](#) (see Exhibit VI(1)(B), in Part VI, Section 1)
- [Colorado Medical Board](#) (see Exhibit VI(3)(C), in Part VI, Section 3)
- [State Board of Optometry](#) (see Exhibit VI(4)(B), in Part VI, Section 4)
- [Colorado Podiatry Board](#) (see Appendix A)
- [Office of Occupational Therapy](#) (see Appendix B)
- [Office of Audiology Licensure](#) (see Appendix C)
- [Office of Hearing Aid Provider Licensure](#) (see Appendix D)

Stakeholder Involvement, Outreach, and Communications.

- DPO’s “Veterans & Military Advisory Committee” met two (2) times in Fiscal Year 2020. This Committee provides DPO with guidance on the development of occupational licensing policies/rules for veterans and members of the military community and provides 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 available opportunities. Members of the Committee include representatives from the following organizations:
 - Air Force Academy
 - Buckley Air Force Base
 - Colorado Community College System
 - Colorado Department of Labor & Employment
 - Colorado Department of Military & Veterans Affairs
 - Colorado Department of Higher Education
 - Colorado Elks Association - Back to Work & Homeless Veterans
 - Colorado State University Global Campus
 - Fort Carson
 - Independent Electrical Contractors - Rocky Mountains (IECRM)
 - National Conference of State Legislatures
 - Northern Colorado Veterans Resource Center
 - Pikes Peak Workforce Center
 - Schriever Air Force Base
 - United Service Organization (USO) Pathfinder Program (Colorado Springs)
 - US Department of Defense State Liaison Office
 - US Department of Labor Veterans’ Employment & Training Services
- DPO staff provided updates on the VOCAL program, and other programs for members of the military and military spouses, to two (2) boards. 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 Chiropractic Examiners
 - Board of Examiners of Nursing Home Administrators

- DPO staff provided program information to, and developed partnerships with, various organizations, including the Air Force Academy, Northern Colorado Veteran Resource Center, the College of Health Science and Administration at Emily Griffith Technical College, Front Range Community College - Larimer, US Department of Labor's Veterans' Employment & Training Services (USDOL VETS), Fort Carson, United Services Organizations (USO), Pikes Peak Workforce Center, and Schriever Air Force Base.
 - This included providing hard and soft copies of flyers and rack cards that explain the programs and services DPO offers to the military community.
 - This also included in person meetings in/at:
 - Greeley - Northern Colorado Veteran Resource Center
 - Denver - Emily Griffith Technical College
 - Colorado Springs - hosted by the USDOL VETS, with representatives from Ft. Carson and the Air Force Academy
 - Fort Carson - hosted by Fort Carson, and including representatives from the USO, Pikes Peak Workforce Center, and Fort Carson's Transition Assistance Program, Education Center, and Career Skills Program

- 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 streamlined policies for veterans during this fiscal year. These five (5) applicants were successful in leveraging their prior military experience to satisfy the Board of Nursing's requirements, as were the ten (10) veterans licensed as nurses and nurse aides in previous years through the use of the VOCAL policies. Altogether, this brings the total nurses and nurse aides who have leveraged their prior military experience for licensure to fifteen (15) 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 of Nursing 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.
- One example success story of veterans leveraging the Board of Nursing's VOCAL policy

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

includes a veteran with experience as a military nurse who applied for licensure as a Registered Nurse (RN). While his military education was found insufficient to qualify for licensure as an RN, the Board of Nursing approved his education and training as equivalent to that of a licensed practical nurse (LPN). As such, he was granted licensure as an LPN.

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 three (3) new 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 and nurse aides who successfully became licensed through streamlined Board of Nursing policies.

In the next fiscal year, DPO plans to wrap up implementation of HB 16-1197 by completing VOCAL analysis for pharmacy technicians, a newly regulated profession in 2020. Additionally, DPO intends to further promote the success of its VOCAL program to veterans and other partners so as to allow for more individuals to take advantage of the streamlined policies and rules for professional licensure or certification in Colorado.

VI. Results Stemming from Fiscal Year 2019 Analyses - By Profession

1. Certified Public Accountants (CPAs)

Fiscal Year 2019 VOCAL analysis identified two pathways for veterans to become CPAs - through reciprocity or through initial application to the Board of Accountancy. For initial application, veterans must meet requirements related to their education and professional experience, as well as pass an examination. Pursuant to a previously adopted Board of Accountancy rule (Rule 5.1.B), experience, education, or training gained in the military may be credited towards qualifications for certification if the Board of Accountancy determines it is substantially equivalent to that required in Colorado. This is most relevant to the education and experience requirements for initial certification. Related to the experience verification process, the Board of Accountancy and DPO staff identified an opportunity for streamlining resulting in the August 2019 adoption of a new policy detailing pathways to certification and how military experience can be applied towards minimum requirements and verified (see Exhibit VI(1)(A), below). DPO also published the pathways to certification for veterans on the Board of Accountancy's [new web page](#) (see Exhibit VI(1)(B), below).

Exhibit VI(1)(A)

Policy 20-2: Pathways to Certification for Applicants with Military Experience

The pathways to certification listed below are available to members of the military and veterans with military experience that may apply towards certification qualifications. Applicants for certification must meet all requirements in statute, as well as the State Board of Accountancy's policies and rules/regulations.

1. Reciprocity: Veteran or military applicants with a current, valid license or registration as a certified public accountant from any US state, territory, or insular possession of the United States or the District of Columbia are eligible for licensure via reciprocity, pursuant to Rule 1.5(E) of the Rules and Regulations of the State Board of Accountancy.
2. Initial Application: Veteran or military applicants who do not hold a current, valid license or registration as a certified public accountant may pursue an initial application, pursuant to Chapter 1.5 of the Rules and Regulations of the State Board of Accountancy.
 - a. Pursuant to Rule 1.5(A), military experience, education, or training may be credited towards requirements for certification, including Education Requirements (Rules 1.2(D) and 1.2(E)) and Experience Requirements (Rule 1.4).
 - b. To apply towards Experience Requirements, accounting experience gained in the military must be verified by one or more certified public accountants.
 - i. Each verifier must meet the requirements of Rule 1.4(A)(5), unless the applicant is requesting an exception to these requirements.
 - ii. If an exception is being considered, the Board may review any barriers the applicant has identified to meet the verifier qualifications in Rule 1.4(A)(5). These barriers may include unique aspects of the military environment or supervisory structure.

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. Documentation must comply with Rule 1.5(B) of the Rules and Regulations of the State Board of Accountancy.

Exhibit VI(1)(B): Published Pathways to Certification for Veterans

Board of Accountancy: Military/Veteran Certification

The pathway to certification as a public accountant for veterans and members of the military with relevant military experience is through reciprocity of another jurisdiction’s license or through initial application. Military and veteran applicants should review [Policy 20-2: Pathways to Certification for Applicants with Military Experience](#) and [Rule 1.5\(A\)\(2\) related to credit for military experience, education, or training towards certification requirements](#). Further information on general requirements provided [here](#).

Reciprocity

As explained in Policy 20-2, veteran or military applicants with a current, valid license or registration as a certified public accountant from any US state, territory, or insular possession of the United States or the District of Columbia are eligible for licensure via reciprocity, pursuant to [Rule 1.5\(E\)](#).

Initial Application

As explained in Policy 20-2, veteran or military applicants who do not hold a current, valid license or registration as a certified public accountant from another jurisdiction may apply for initial licensure, pursuant to [Chapter 1.5 of Board Rules & Regulations](#). If wishing to apply military experience, education, or training towards requirements, the following should be noted:

- **Education Requirements:** Military experience, education, or training may be credited towards Education Requirements, but only if an Accredited Baccalaureate Granting College has accepted it. Per [Rule 1.2\(E\)\(4\)](#) and [Rule 1.2\(D\)\(5\)](#), acceptance is demonstrated either by the college including the credit on an official transcript, or by the college otherwise verifying to the Board that the credit would apply towards graduation.
- **Experience Requirements:** Accounting experience gained while serving in the military that conforms with [Rule 1.4](#) may be applied towards the minimum Experience Requirements. Pursuant to Rule 1.4(A)(4), the Board may accept experience other than that delineated in rule if it is comparable, as determined on a case-by-case basis. Policy 20-2 outlines how individuals who have military accounting experience may be considered for an exception related to who can verify their accounting experience. More details on verifications can be found in Rule 1.4(A).

Other helpful information for veterans and members of the military can be found on DORA’s main [Military and Veterans Programs site](#). This website also contains information for [relocated military spouses](#).

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

2. Combative Sports Officials

Fiscal Year 2019 VOCAL analysis of the credentialing process for referees, judges, and inspectors (collectively, “officials”) identified streamlining opportunities. Specifically, Program rules set forth 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 adopted Rule 14.2(D) to credit any experience gained while serving in the military as an official towards minimum experience requirements. See Exhibit VI(2)(A) below for the adopted rule, which became effective in December of 2019.

Exhibit VI(2)(A)

Rule 14.2(D) Credit for Military, Education, Training, or Experience

1. 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.
2. 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.
3. The Director will determine, on a case-by-case basis, whether the applicant's military education, training, or experience meet the requirements for licensure.
4. 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.
5. 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.

3. Medical (Physicians, Physician Assistants)

Fiscal Year 2019 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) adopted a rule and a policy.

- *Rule 910: Rules and Regulations Relating to Education, Training, or Service Gained during Military Service.* This 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. This rule also specifies that the practice of medicine while on active duty shall be credited towards the minimum continued competency requirements for licensure as a physician and that the practice as a physician assistant while on active duty shall be credited towards the minimum continued competency requirements for licensure as a physician assistant. See Exhibit VI(3)(A) below for this rule, which became effective in October of 2019.
- *Policy 20-22: Physician License Endorsement Applications.* This policy lays out the requirements for licensure by endorsement for physicians, and specifies 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. See Exhibit VI(3)(B) below for this policy, adopted in August of 2019.

DPO also published the pathways to licensure for veterans on a [new page of the Board's website](#) (see Exhibit VI(3)(C), below).

Exhibit VI(3)(A)

Rule 910 (3 CCR 713-43): Rules and Regulations Relating to Education, Training, or Service Gained during Military Service

43.1 Authority

The authority for promulgation of these rules and regulation by the Colorado Medical Board (“Board”) is set forth in sections 12-20-202(4), 12-240-106(1)(a), 12-240-110(1)(d)(I)(C), 12-240-119, 12-240-120(1)(d), 12-240-141, 12-20-202(2), and 24-4-201 et seq., C.R.S.

43.2 Scope and Purpose

The following rules and regulations have been adopted by the Board to implement the requirements set forth in section 12-20-202(4), C.R.S., and to otherwise streamline licensure for applicants with relevant military education, training, or experience, pursuant to Colorado House Bill 16-1197.

43.3 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.

43.4 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.

Exhibit VI(3)(B)

Policy 20-22: Physician License Endorsement Applications

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 12-240-110, 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 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 Rule 910.

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.

Exhibit VI(3)(C): Published Pathways to Licensure for Veterans

Colorado Medical Board: Military/Veteran Licensing

Veterans and members of the military seeking licensure from the Colorado Medical Board should review [Rule 910: Rules and Regulations Related to Education, Training, or Service Gained During Military Service](#).

Physicians

The pathway to licensure for individuals who practiced as a physician in the military and who currently hold a license (in good standing) from another U.S. state or jurisdiction involves applying for licensure via the Interstate Medical Licensure Compact (IMLC) or applying for licensure by endorsement. Please review the relevant statutes, rules, policies, and procedures, including but not limited to:

- For Endorsement Applicants:
 - [Board Policy 20-22: Physician License Endorsement Applications](#)
 - [Physician License Application Checklist](#)
 - [Rule 120: Demonstration of Continued Competency by Physician Applicants](#)
- For IMLC Applicants:
 - [Interstate Medical Licensure Compact Application Checklist](#)

Additional application information and forms for physician applicants can be found on [this website](#).

Physician Assistants

Individuals who practiced as a physician assistant in the military and who wish to practice in Colorado must submit an application. For physician assistant requirements, please review the relevant statutes, rules, policies, and procedures, including but not limited to:

- [Physician Assistant Licensing Requirements](#)
- [Physician Assistant Application Checklist](#)
- [Rule 400: Licensure of and Practice by Physician Assistants](#)

Additional application information and forms for physician assistant applicants can be found on [this website](#).

Anesthesiologist Assistants

The U.S. military does not currently utilize anesthesiologist assistants, but veterans who wish to practice this profession in Colorado may apply for licensure if they meet licensing requirements. For anesthesiologist assistant requirements, please review the relevant statutes, rules, policies, and procedures, including but not limited to:

- [Anesthesiologist Assistant Application Checklist](#)
- [Rule 510: Licensure of and Practice by Anesthesiologist Assistants](#)

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

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

4. Optometry

Fiscal Year 2019 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), and in August of 2019 the Board adopted *Policy 20-6: Guidance Pertaining*

to Applying Military Service towards Endorsement Licensure Qualifications (see Exhibit VI(4)(A), below). This 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).

DPO also published the pathways to licensure for veterans on a [new page of the Board's website](#) (see Exhibit VI(4)(B), below).

Exhibit VI(4)(A)

Policy 20-6: Guidance Pertaining to Applying Military Service towards Endorsement Licensure Qualifications

Purpose: To provide guidelines and clarification on State Board of Optometry Rule 1.11 (endorsement) and Rule 1.19 (military experience), with respect to Board expectations for applying military service towards endorsement licensure qualifications.

The practice of optometry in the military shall apply towards the minimum requirements for active engagement in the practice of optometry specified in Rule 1.11(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 1.11(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 VI(4)(B): Published Pathways to Licensure for Veterans

State Board of Optometry: Military/Veteran Licensure

The pathway to licensure for individuals who practiced as an optometrist in the military and who currently hold a license (in good standing) from another U.S. state or jurisdiction involves applying for licensure by endorsement. Please review the relevant statutes, rules, and policies, including but not limited to:

- [Rule 1.11: Endorsement](#)
- [Rule 1.19: Armed Services Experience](#)
- [Policy 20-5: Exam Requirements for Endorsement Applicants](#)
- [Policy 20-6: Guidance Pertaining to Applying Military Service towards Endorsement Licensure Qualifications](#)

Overall, veteran and military applicants must meet the requirements for endorsement outlined in statute and Rule 1.11. However, Policy 20-5 allows for the Board - at its discretion - to approve endorsement applicants who have not passed certain parts of the National Board of Examiners in Optometry (NBEO) exam. Additionally, Policy 20-6:

- specifies that military experience applies towards requirements for active engagement in the practice of optometry;
- allows for the demonstration of the required 24 months of active practice over the previous 36 months (as opposed to only over the previous 24 months); and
- provides examples of documentation of relevant military experience, education, or training.

Applicants should also review the [Optometrist Application Checklist](#).

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

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

VII. Fiscal Year 2020 Analysis Results - By Profession

1. Acupuncturist

VOCAL analysis of the credentialing process for acupuncturists found no need for streamlining measures because licensing of acupuncturists with military experience has already been streamlined. Specifically, VOCAL analysis found that the military does not have an occupational specialty related to the practice of acupuncture. However, some military professions receive training in, and/or actually practice, acupuncture. To ensure that such training and experience is recognized, the Office of Acupuncture Licensure (Office) previously adopted a rule specific to those who practiced in the military. Specifically, Rule 1.1(C) allows, on a case-by-case basis, military experience, education, and training to be credited towards minimum licensure requirements, if such experience, education, and training is substantially equivalent to that required for licensure. 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 satisfactory evidence.
- *Identify reciprocity measures with other states:* While Colorado does not offer acupuncturist licensure via reciprocity, applicants with a credential from another jurisdiction can apply for a Colorado license by endorsement, pursuant to state law and the Office's rules and regulations.
- *Determine if an occupational exam is available to authorize practice:* Currently, certification by the National Certification Commission for Acupuncture and Oriental Medicine (NCCAOM) authorizes practice in Colorado. According to NCCAOM, all other states that regulate acupuncture, except California, require either NCCAOM certification and/or passage of the examinations required by NCCAOM for certification.

2. Athletic Trainer

VOCAL analysis of the athletic trainer application process identified streamlining measures related to applying military education, training, or experience towards licensure requirements. To streamline the application process for veterans, the Office of Athletic Trainer Licensure (Office) adopted one rule. The adopted new Rule 1.12 (see Exhibit VII(2)(A), below) states that military education, training, or service that is substantially equivalent to that required in Colorado will be accepted towards the qualifications for licensure and reinstatement, upon the submission of satisfactory evidence. The adopted new rule has a presumed effective date of July 15, 2020. Analysis results:

- *Extent to which military training meets requirements to practice an occupation:* Pursuant to the adopted 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.
- *Identify reciprocity measures with other states:* While Colorado does not offer athletic trainer licensure via reciprocity, applicants with a credential from another jurisdiction can apply for a Colorado licensure by endorsement, pursuant to state law and the Office's rules and regulations.
- *Determine if an occupational exam is available to authorize practice:* The Board of

Certification for the Athletic Trainer (BOC) examination authorizes practice in Colorado. According to the BOC, the District of Columbia and all 48 other states that regulate athletic training accept the BOC exam.

Exhibit VII(2)(A)
ADOPTED Rule 1.12

The purpose of this Rule is to delineate the requirements for the Director's acceptance of education, training, or service gained in the military towards the qualifications for licensure, pursuant to section 12-20-204, 12-205-116, and 12-20-202(4), C.R.S.

- A. Education, training, or service gained in military services outlined in section 12-20-202(4), C.R.S., to be accepted and applied towards licensure or reinstatement of an expired license, must be substantially equivalent, as determined by the Director, to the qualifications otherwise applicable at the time of receipt of application.
- B. It is the applicant's responsibility to provide timely and complete evidence for review and consideration.
- C. Satisfactory evidence of such education, training, or service will be assessed on a case by case basis.
- D. Documentation of military experience 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.

3. Chiropractor

VOCAL analysis determined that the military does not utilize chiropractors 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 chiropractors, thus there is not military training to apply towards licensure requirements.
- *Identify reciprocity measures with other states:* While Colorado does not offer chiropractor licensure via reciprocity, applicants with a credential from another jurisdiction can apply for a Colorado license by endorsement, pursuant to state law and the Board of Chiropractic Examiners' rules and regulations.
- *Determine if an occupational exam is available to authorize practice:* The exam series offered by the National Board of Chiropractic Examiners (NBCE) authorizes practices in Colorado. According to the NBCE, this exam series also authorizes practice in all other states.

4. Direct-Entry Midwife

VOCAL analysis determined that the military does not utilize direct-entry midwives 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 direct-entry midwives, thus there is not military training to apply towards registration requirements.
- *Identify reciprocity measures with other states:* While Colorado does not offer direct-entry midwife registration via reciprocity, applicants with a credential from another jurisdiction can apply for a Colorado registration by endorsement, pursuant to state law and the Office of Direct-Entry Midwifery Registration's rules and regulations.
- *Determine if an occupational exam is available to authorize practice:* Various paths authorize practice in Colorado, including the exam and certification as a Certified Professional Midwife, both offered by the North American Registry of Midwives (NARM). According to NARM, all 31 states that regulate direct-entry midwives use the NARM examination or certification as authorization for practice.

5. Massage Therapist

VOCAL analysis determined that the military does not utilize massage therapists 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 massage therapists, thus there is not military training to apply towards licensure requirements.
- *Identify reciprocity measures with other states:* While Colorado does not offer massage therapy licensure via reciprocity, applicants with a credential from another jurisdiction can apply for a Colorado license by endorsement, pursuant to state law and the Office of Massage Therapy's rules and regulations.
- *Determine if an occupational exam is available to authorize practice:* The Massage & Bodywork Licensing Examination, offered by the Federation of State Massage Therapy Boards (FSMTB), authorizes practices in Colorado. According to the FSMTB, this exam also authorizes practice in 46 of the 49 US jurisdictions where massage therapy is regulated. For authorization to practice, Colorado also accepts other exams, including the National Certification Examination for Therapeutic Massage and Bodywork and National Certification Examination for Therapeutic Massage offered by the Board for Therapeutic Massage and Bodywork (NCBTMB).

6. Naturopathic Doctor

VOCAL analysis determined that the military does not employ naturopathic doctors 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 employ naturopathic doctors, thus there is not military training to apply towards registration requirements.

- *Identify reciprocity measures with other states:* While Colorado does not offer naturopathic doctor registration via reciprocity, applicants with a credential from another jurisdiction can apply for a Colorado registration by endorsement, pursuant to state law and the Office of Naturopathic Doctor Registration’s rules and regulations.
- *Determine if an occupational exam is available to authorize practice:* According to the North American Board of Naturopathic Examiners (NABNE), passage of both Part I (Biomedical Science) and Part II (Core Clinical Science) of the Naturopathic Physician Licensing Examination (NPLEX) authorizes practice in Colorado and in all other states that regulate naturopathic doctors (though some other states require supplemental parts of the NPLEX as well.)

7. Nursing Home Administration

VOCAL analysis of the credentialing process for nursing home administrators did not identify any streamlining measures for licensure as a nursing home administrator, as the process is already streamlined. However, VOCAL analysis identified streamlining measures for applicants to the Administrator-in-Training program. Specifically, the Board of Examiners of Nursing Home Administrators (Board) promulgated updates to rules to expand the opportunity to credit military experience, education, or training towards Administrator-in-Training requirements.

- The Board previously promulgated Rule 1.1(P), which is applicable to nursing home administrator and Administrator-in-Training applicants. This 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.
- In the updated Rule 1.3(B)(1), the Board may consider - on a case-by-case basis - waiving some of the required experience/education for entry into the Administrator-in-Training for applicants submitting military training, education, or experience. See Exhibit VII(7)(A) below for this rule.
- In the updated Rule 1.3(D), the Board may consider experience in a hospital setting when determining whether to waive a portion of the Administrator-in-Training training time period. While this rule is not specific to military or veteran applicants, the expansion of the type of experience that would allow the granting of a waiver should assist military and veteran applicants who have experience in facilities that are not specifically a “nursing home.” See Exhibit VII(7)(B) below for this rule.

Analysis results:

- *Extent to which military training meets requirements to practice an occupation:* Pursuant to previously-adopted 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 satisfactory evidence.
- *Identify reciprocity measures with other states:* While Colorado does not offer nursing home administrator licensure via reciprocity, applicants with a license from another jurisdiction can apply for a Colorado license by endorsement, pursuant to state law and the Board’s rules and regulations. For the Administrator-in-Training program, applicants may submit experience, education, or training completed in another state.
- *Determine if an occupational exam is available to authorize practice:* To authorize practice,

Colorado requires passage of two exams: The National Association of Long Term Care Administrator Boards (NAB) Examination and a state-specific exam. According to NAB, all other US states and the District of Columbia also use the NAB Examination to authorize practice, though other states may also use state-specific exams. For the Administrator-in-Training program, no exam is required to authorize practice.

Exhibit VII(7)(A)

Revised Rule 1.3(B)(1)(e)

New Language (Redlined):

1. The applicant must have two years college level study in areas relating to health care or two years of experience in nursing home administration or comparable health care management for each year of required education.
 - a. College level study ...
 - b. Experience
 1. Experience must be obtained in nursing home administration or comparable health care management.
 2. Experience in comparable health care management may include, but is not limited to: ...
 - c. The Board may approve substitution of two years of Board approved experience for one year of education, or may approve proportional experience for various amounts of education.
 - d. Applicants will not be required to possess experience in administration as defined in Rule 1.2(A)(5) in order to apply for the AIT program. This experience will be gained through participation in the program.
 - e. The Board, on a case-by-case basis, may waive any portion of the college level study and/or experience specified in this Rule 1.3(B)(1) for an applicant submitting military training, experience, or education as part of the application for admission into the AIT program.

Exhibit VII(7)(B)

Revised Rule 1.3(D)

New Language (Redlined):

1. The Board may consider an applicant's request for waiver of any portion of the AIT period provided the applicant has had responsibility for performing all of the administrative or supervisory tasks in a nursing home or hospital in any of the following categories including, but not limited to:
 - a. Budgeting, accounting, records management, organization, personnel, and business management.

- b. Medical, sociological, psychological, environmental, quality assurance, and therapeutic aspects of resident care.
2. ...
3. ...
4. Waiver Considerations
 - a. Experience in administration shall require: ...
 - b. Experience in administration shall not include ...
 - c. Experience gained in a hospital setting shall be in one or more of the following areas:
 1. Long-term acute care hospital;
 2. Transitional care unit;
 3. “Swing bed” unit; or
 4. Behavioral health hospital.

8. Outfitter

VOCAL analysis identified streamlining measures related to registration requirements for veterans and members of the military, in relation to the requirement that outfitters hold a valid first aid card. Based on this, the Office of Outfitters Registration adopted a revised rule (see Exhibit VII(8)(A) below for this rule), which specifies that military training, education, or experience in first aid within the previous 24 months is equivalent to holding a first aid card. The adopted new rule has a presumed effective date of July 15, 2020.

Analysis results:

- *Extent to which military training meets requirements to practice an occupation:* The adopted rule specifies that military training, education, or experience in first aid within the previous 24 months is equivalent to holding a first aid card, which is a requirement for registration.
- *Identify reciprocity measures with other states:* While Colorado does not offer registration as an outfitter via reciprocity or endorsement, the qualifications for registration create a minimal barrier to entry. Specifically, the main qualification for practice is possession of a first aid card.
- *Determine if an occupational exam is available to authorize practice:* An occupational exam is not required, nor does one exist, to authorize practice. However, the main qualification for practice is possession of a first aid card, which can be obtained through various national certification organizations, such as the American Red Cross or the American Heart Association.

Exhibit VII(8)(A)

ADOPTED Revised Rule 1.2(D)(2)

As used in sections 12-145-106(1) and 12-145-108(1)(b), C.R.S., and these Rules, the Director considers the following to constitute “equivalent training” to holding a first aid card or a first aid instructor’s card issued by the American Red Cross:

- a. American Heart Association training or certification,
- b. Any Wilderness First Aid training or certification,
- c. Wilderness First Responder training or certification,
- d. Emergency Medical Technician (EMT) – Basic, Intermediate, or Paramedic training or certification,
- e. Mountain Oriented First Aid training or certification, or
- f. Education, training, or experience in first aid obtained in the military, which may include conducting a physical exam, assessing vital signs, providing wound and other medical care, and making decisions in emergency or life threatening situations.
 1. For outfitters, such military experience, education, or training must have been completed within the 24 months immediately preceding the application date.
 2. Outfitters are required to ensure that any guide in their employment or with whom they have contracted has completed such military experience, education, or training in the preceding 24 months from the date of hire or contract.
 3. If requested, documentation of military experience, education, or training in first aid 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, or evaluation reports. If requested, Outfitters can demonstrate completion of the above training by supplying supporting documentation, which shall constitute evidence of equivalent training.

9. Private Investigator

VOCAL analysis of the credentialing process for private investigators found no need for streamlining measures because licensing of private investigators with military experience has already been streamlined. Specifically, to address Colorado’s requirements, the Office of Private Investigator Licensure previously adopted a rule specific to those who practiced in the military. Rule 1.3(B)(7)(d) allows “investigative experience gained in military education, training, or service” to be applied towards the minimum number of hours required for licensure as a Level II Private Investigator. Additionally, there are no experience or education requirements for licensure as a Level I Private Investigator. Analysis results:

- *Extent to which military training meets requirements to practice an occupation:* As specified in Rule, investigative experience gained in military education, training, or service will be accepted towards the qualifications for licensure.
- *Identify reciprocity measures with other states:* While Colorado does not offer private

investigator licensure via reciprocity or endorsement, an applicant with credentials from another state has minimal barriers to entry for a Level I Private Investigator license in Colorado, since there are no education or experience qualifications for licensure. Additionally, applicants with investigation experience from another state may apply such experience to the minimum number of hours required for licensure as a Level II Private Investigator.

- *Determine if an occupational exam is available to authorize practice:* Currently, no occupational exam is required in Colorado to authorize practice. Colorado does require applicants to pass a Colorado-specific jurisprudence exam on Colorado's laws and rules affecting the ethics and activities of private investigators.

10. Respiratory Therapist

VOCAL analysis of the credentialing process for respiratory therapists found no need for streamlining measures because licensing of respiratory therapists with military experience has already been streamlined. Specifically, state law requires that applicants for respiratory therapist licensure hold a national certification. Training programs offered to military service members who practice as respiratory therapists in the military provide service members the qualifications necessary to sit for the national certification exam (that is, the military training program is accredited and results in service members obtaining an associate's degree). Additionally, some branches of the military require passing of the national certification exam and/or obtaining state licensure as a respiratory therapist. Additionally, the Office of Respiratory Therapy Licensure previously adopted a rule specific to those who practiced in the military. Rule 1.6 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. 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 satisfactory evidence.
- *Identify reciprocity measures with other states:* Pursuant to state law, Colorado offers licensure via reciprocity to applicants with an unrestricted license in good standing from another US jurisdiction if the qualifications for that jurisdiction are substantially equivalent to Colorado's and based on any disciplinary actions against the applicant's other licenses.
- *Determine if an occupational exam is available to authorize practice:* According to the National Board for Respiratory Care (NBRC), passage of its exam(s) leads to certification as either a Certified Respiratory Therapist or Registered Respiratory Therapist (depending on experience level, education/training, and exams taken). Both of these national certifications authorize practice in Colorado, and, according to the NBRC, also authorize practice in all 48 other states that regulate respiratory therapy.

11. Speech-Language Pathologist

VOCAL analysis of the credentialing process for speech-language pathologists found no need for streamlining measures because certification of speech-language pathologists with military experience has already been streamlined. Additionally, the military stopped commissioning officers as speech-

language pathologists in recent years (instead, relying on civilian contractors for services), which means there will be a decreasing number of veterans who practiced as a speech-language pathologist in the military in upcoming years.

To address any instances where a speech-language pathologist has previous military practice, the Office of Speech-Language Pathology Certification (Office) previously adopted Rule 1.5, which states that military education, training, or service that is substantially equivalent to that required in Colorado will be accepted towards the qualifications for certification, upon submission of satisfactory evidence. State law sets the qualifications for certification - if someone does not hold a credential from another jurisdiction - as holding a master's degree in communication sciences and disorders, having completed a fellowship, and having passed an examination. The Office's rules and regulations further specify that holding a Certificate of Clinical Competency from the American Speech-Language-Hearing Association (ASHA) demonstrates that the applicant meets these statutory requirements. 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 certification, upon submission of satisfactory evidence. This means that equivalent military practice satisfies Colorado's requirement for demonstrating competency (for those seeking licensure by endorsement), and practice/training through the military may satisfy the fellowship requirements.
- *Identify reciprocity measures with other states:* While Colorado does not offer speech-language pathology certification via reciprocity, applicants with a credential from another jurisdiction can apply for a Colorado certification by endorsement, pursuant state law and to the Office's rules and regulations.
- *Determine if an occupational exam is available to authorize practice:* A Certificate of Clinical Competency issued by ASHA and/or passing ASHA's Praxis Speech-Language Pathology Subject Assessment exam (Praxis exam) authorizes practice in Colorado (other exams may also be accepted). According to ASHA, nearly every state's regulator recognizes an ASHA Certificate of Clinical Competency as authorization to practice and many states accept ASHA's Praxis exam as authorization to practice.

Appendix A. Colorado Podiatry Board: Military/Veteran Licensing webpage

[Divisions](#) > [Professions and Occupations](#) > [Boards and Programs](#) > [Podiatry](#) > Colorado Podiatry Board: Military/Veteran Licensing

Colorado Podiatry Board: Military/Veteran Licensing

The pathway to licensure for individuals who practiced as a podiatrist in the military and who currently hold a license (in good standing) from another U.S. state or jurisdiction involves applying for licensure by endorsement. Please review the relevant statutes, rules, and policies, including but not limited to:

- [Rule 100\(1.3\): Licensure by Endorsement](#)
- [Rule 100\(1.4\): Credit for Military Education, Training, or Experience](#)
- [Policy 20-6: Guidance for veterans and members of the military applying military service towards endorsement licensure qualifications](#)

Overall, veteran and military applicants must meet the requirements for endorsement outlined in statute and Rule 100(1.3). However, Rule 100(1.3)(C) allows for the Board - at its discretion - to approve endorsement applicants who have not passed the written PMLEXIS examination. Additionally, Policy 20-6 provides guidance for how military service may be applied towards active practice or continued competence requirements.

Applicants should also review the [Podiatrist Application Checklist](#).

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

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

Appendix B. Office of Occupational Therapy: Military/Veteran Licensing webpage

[Divisions](#) › [Professions and Occupations](#) › [Boards and Programs](#) › [Occupational Therapy](#) › Office of Occupational Therapy: Military/Veteran Licensing

Office of Occupational Therapy: Military/Veteran Licensing

The pathway to licensure as an occupational therapist or occupational therapy assistant may be through licensure by examination or licensure by endorsement. Veteran and military applicants should review [Rule 1.14: Credit for Military Experience and Pathways to Licensure for Veterans and Members of the Military](#).

Applicants should also review the relevant statutes and [rules](#), including but not limited to:

- Rule 1.1: Occupational Therapist Licensure by Examination
- Rule 1.2: Occupational Therapist Licensure by Endorsement
- Rule 1.10: Occupational Therapy Assistant Licensure by Examination
- Rule 1.11: Occupational Therapy Assistant Licensure by Endorsement

Applicants may also find helpful the relevant Application Checklist, for [Occupational Therapists](#) or [Occupational Therapy Assistants](#).

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

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

Appendix C. Office of Audiology Licensure: Military/Veteran Licensing webpage

[Divisions](#) › [Professions and Occupations](#) › [Boards and Programs](#) › [Audiology](#) › Office of Audiology Licensure: Military/Veteran Licensing

Office of Audiology Licensure: Military/Veteran Licensing

The pathway to licensure for individuals who practiced as an audiologist in the military and who currently hold an audiologist license (in good standing) from another U.S. state or jurisdiction, involves the submission of an endorsement application. Endorsement requirements are outlined in [Rule 1.2: Licensure by Endorsement](#). Rule 1.2(D) specifies that the practice of audiology (including externships) in the military may be counted towards experience requirements that substitute for minimum education, examination, or certificate requirements.

Additionally, military and veteran applicants should review [Rule 1.11: Credit for Military Education, Training, or Experience](#). All applicants should also review [Audiologist Application Checklist](#), as well as all other relevant statutes and rules.

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

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

Appendix D. Office of Hearing Aid Provider Licensure: Military/Veteran Licensure webpage

[Divisions](#) › [Professions and Occupations](#) › [Boards and Programs](#) › [Hearing Aid Providers](#) › Office of Hearing Aid Provider Licensure: Military/Veteran Licensure

Office of Hearing Aid Provider Licensure: Military/Veteran Licensure

The pathway to licensure as a hearing aid provider for veterans and members of the military may be through original licensure or licensure by endorsement. Veterans and members of the military seeking licensure should review [Rule 1.10: Credit for Military Education, Training, or Experience](#). All applicants should also review the [Hearing Aid Provider Application Checklist](#), as well as all other relevant statutes and rules.

Endorsement Applications

For individuals who have relevant military experience and who currently hold a hearing aid provider license (in good standing) from another U.S. state or jurisdiction, licensure requirements are listed in [Rule 1.2: Licensure by Endorsement](#). Rule 1.2(D) specifies military experience that generally conforms to the scope of practice of Colorado-licensed hearing aid providers may be credited towards active practice requirements that substitute for minimum education, examination, or certificate requirements.

Original Applications

For individuals who do not currently hold a hearing aid provider license from another U.S. state or jurisdiction, licensure requirements are listed in [Rule 1.1: Original Licensure](#). Additionally, pursuant to Rule 1.10(E) (Credit for Military Education, Training, or Experience), relevant military experience may be credited towards the minimum amount of experience required for applicants who have not passed the National Competency Examination and who do not hold an associate's degree in hearing aid fitting and dispensing (passing of an approved entry-level examination is still required).

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

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