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EXHIBIT \_\_\_\_\_  
 DATE 1/24/13  
 HB 259

JAN 24 2013

January 24, 2013

FAX: Representative David Moore

Representative Tom Berry, Chair  
 Business and Labor Committee  
 Montana House of Representatives  
 P.O. Box 200400  
 Helena, Montana 59620-0400

RE: LETTER OF OPPOSITION  
 HOUSE BILL 259 – Revising professional, occupational licensing terms regarding military training

Chairman Berry and Members of the Business and Labor Committee:

I serve on the Board of Sanitarians but I am writing representing myself only and not the board. While I appreciate the thought of this bill regarding consideration for veterans, I do not support this bill for the following reasons:

1. Each license and board has its individual needs. It is not likely that it is appropriate for each board to accommodate military training. Registered Sanitarian licensing requires a BS degree in Environmental Health or a BS degree that is equivalent. The purpose of the college degree is to assure a high standard of education and training for the protection of public health and safety.
2. The Board does not have the expertise to evaluate military training to ascertain if it is somehow equivalent to a college-degreed program. The proper method for this is best described by a registered sanitarian who also previously served in the military. He has stated:

*I went through this process myself about 10 years ago and forget some of the details, but when a person leaves the military they can request a "transcript" if you will of their military training. Most major colleges will then take that transcript, review it, and actually give you college credit if your military training matches up with classes that they offer. At least the University of Montana did this for me. I believe that I had to pay some amount to have those credits recorded on my transcript but if I had chosen to start with a 2 year criminal justice degree then I probably could have knocked at least the first year off that due to my training.*

*Our board requires a college degree and the colleges already have a mechanism in place to determine if military training is applicable.*

*When I left the military I was making much more than I am now in my civilian job and I had been able to accumulate all the household items necessary for a family. I had the Montgomery GI Bill which I believe is available to every military member. I was also eligible for student loans and grants which are pretty much a given. It was not that hard to transition to a civilian life and go to college, even though I was working full time and had a newborn baby my first year. There are civilians that have a much, much harder life that manage to make it through college so I have a tough time giving more to people just because they are veterans.*

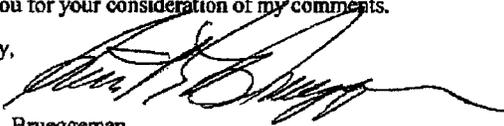
As stated, the military training is evaluated by the university so that college credits can be assigned. Licensing board members do not have the expertise to evaluate military training relative to a college-degreed program. This method requires no change in state law as proposed.

3. The bill states that each board must makes rules to provide for military service education and training. Even if this is done in some collective way, my understanding is that state law requires each board to pay its share of department expenses. This expense may not be an issue for large boards. The Board of Sanitarians is one of the smallest boards in the state. Our budget is very limited even though our licensees pay relatively high annual fees. Our members are already struggling with our annual licensing fees, and we have done all we can to keep our costs as low as possible. That the legislature may be asked to cover the cost is of interest, but I would hold the concern that each board will be asked to cover its "fair share" as required by state law.

The purpose of state licensing is to provide protection to the public by requiring a standard of education, training, and ethics. While this bill is certainly commendable in its intent, recognition and/or evaluation of military training may not be equally appropriate to all boards.

Thank you for your consideration of my comments.

Sincerely,

  
 Susan K. Brueggeman  
 39341 Lakeview Drive  
 Polson, Montana 59860