

VERMONT SECRETARY OF STATE
OFFICE OF PROFESSIONAL REGULATION

APPRENTICE PATHWAYS TO PROFESSIONAL
LICENSURE IN VERMONT

This report evaluates the existing professional apprenticeships and other experience-based pathways to professional licensure in Vermont. Findings suggest it may be possible to expand apprenticeship opportunities in certain regulated occupations. Likewise, all future proposals for new occupational regulation should answer whether an experience-based pathway serves as an appropriate alternative to formal education.

History

Pursuant to 2018, No. 114, 10, OPR published the report *Occupational Regulation and Migrant Professionals in Vermont: Reducing Barriers for Qualified Immigrants*. The report recommended to leverage the apprenticeship pathways to professional licensure.

Apprenticeship is an underappreciated solution to many of the challenges confronting immigrant professionals. **With the aggressive growth of graduate education and attendant credential inflation secondary to federal student-loan guarantees, many paths to professional licensure through apprenticeship fell into disuse.** They should be revived, and many are being revived. In barbering, cosmetology, esthetics, manicuring, funeral service, and opticianry, OPR has received legislative authorization to expand and modernize apprenticeship and is undertaking significant rulemaking and apprenticeship program development, with support from a United States Department of Labor grant.

For an immigrant with substantial foreign training that doesn't quite fit, apprenticeship can be a godsend, offering flexibility that meets the apprentice where he is, with time-to-completion determined by demonstration of competency rather than fixed supervised-practice hours. **A well-structured apprenticeship can offer the benefits of formal education and practical training together.** An immigrant with substantial in-field training in his country of origin should be able to race through one, demonstrating skills he already attained in his country of origin, and giving necessary assurances to regulators who may not be able to obtain or understand his foreign educational credentials. To such an immigrant, apprenticeship stands more as an extended exam than *de novo* schooling. An immigrant with marginal in-field training, on the other hand, may find that apprenticeship serves a schooling function that offers a degree of peer-to-peer networking and social integration rarely available in a formal graduate or professional program. **We recommend that the General Assembly preserve and expand apprenticeship as a path to licensure wherever possible, while zealously**

guarding against unjustified formalization efforts of which the academy and professional societies can be too fond.¹ [emphasis added]

After filing that report the General Assembly directed the Office of Professional Regulation (OPR) and Agency of Administration as follows:

On or before January 15, 2020, the Office of Professional Regulation and the Agency of Administration shall collect the following information from the Agency of Education, the Agency of Human Services, the Agency of Natural Resources, the Department of Public Safety, and the Department of Health and report that information, along with the Office's own information, to the Senate and House Committees on Government Operations, the Senate Committee on Economic Development, Housing and General Affairs, and the House Committee on Commerce and Economic Development:

- (1) a list of all professions licensed under the entity's authority, identifying which of the licensed professions have an apprenticeship pathway to licensure and which do not;*
- (2) an explanation detailing why professions that do not have an apprenticeship pathway to licensure do not, and if one should be established; and*
- (3) a proposal for how to implement an apprenticeship pathway to licensure for those professions for which such a pathway should be established.*

— 2019 No. 30, § 7a

The Office of Professional Regulation, with the assistance of the Agency of Administration who facilitated communication and coordination, surveyed the following agencies regarding apprenticeships in their occupational fields:

Department of Health,
Agency of Education,
Agency of Natural Resources,
Department of Public Safety, and
Agency of Human Services.²

Specifically, participant agencies were asked to review existing apprenticeship programs, and the potential for expanding apprenticeship pathways to professional licensure where no such opportunity currently exists.

¹ Vermont Secretary of State's Office of Professional Regulation, *Occupational Regulation and Migrant Professionals in Vermont: Reducing Barriers for Qualified Immigrants*, 2019: 10.

² This survey was part of the larger Act 30 (2018) survey package delivered to said agencies. The Act 30 surveys were an extension of Act 156 (2016 §§ 20-21). Act 30 requires OPR to review all occupational regulation in Vermont and recommend if regulatory restructuring is necessary. Both the subject of apprenticeships and Canadian bridge-licensing were added to the Act 30 process as a matter of convenience rather than as specific determinants of restructuring.

Introduction to Professional Apprenticeships

The State must balance the need to protect the public through regulation of initial professional qualifications and ongoing competence, with the barriers to market access those regulations create.³ By enforcing minimum qualification standards, occupational regulation represents an intentional barrier to entry into regulated professions. Frequently, license qualification criteria call for highly specific degrees, leading aspirants to the regulated profession to incur substantial tuition debt; an obstacle of particular concern to the next generation of professionals. Professional apprenticeships offer a means of attaining qualifications for licensure that mitigates the significant barriers presented by tuition expense and time out of work. Apprenticeship can be a pathway to professional licensure that does not require one to put their life on hold to train. However, apprenticeships are not appropriate for all regulated occupations.

There is little difference between an apprentice in an unregulated occupation and an entry-level employee. Thus, for the purpose of this report, it should be clear that the focus is on *professional apprenticeships*, i.e. apprenticeships within regulated occupations. Professional apprenticeships are inherently distinct from other types of on-the-job training because they are structured to meet the requirements of a licensing authority rather than those established independently by an employer. In other words, professional apprenticeships are a form of workforce development where employers provide training, the structure of which is predetermined by law or regulation.⁴

The United States does not utilize apprenticeships to the same degree as other developed nations. For example, the US Department of Labor's Registered Apprenticeship system is the single largest apprenticeship program in the country. As of 2018 there were 585,000 individuals enrolled in registered apprenticeships, approximately 0.36% of the national workforce. By comparison, in Austria, Germany, and Switzerland, 55-70% of all young people enter apprenticeships.⁵ Recognizing the substantial benefits to the employer as well as to the professional apprentice, expanding apprenticeship opportunities offers a potential solution to Vermont's workforce development challenges.

There are significant benefits to employers who offer training through professional apprenticeship. Perhaps most obvious is that the employers themselves are industry members who require a highly skilled workforce. In this sense, employers offering professional apprenticeships are simply self-interested rational actors working to assure the "talent pipeline" does not run dry.

However, studies indicate that there are benefits for employers beyond a well-stocked labor pool. Longer-term apprenticeship benefits to employers include greater employee loyalty and retention over time.⁶ The rate of attrition for apprenticeship-graduates is reportedly one-third of that for external hires.⁷ Thus apprenticeship employers are more likely to retain institutional knowledge as experts near retirement age. Likewise, apprenticeship employers report greater confidence promoting former

³ 26 V.S.A. §§ 3101-3107.

⁴ The Department of Labor's Registered Apprenticeship program includes both regulated and non-regulated occupations. While the registered apprenticeships are formal apprenticeships (overseen by the State) only the regulated occupations are considered "professional apprenticeships" for the purposes of this report.

⁵ Pallasch, John. 2019. "Apprenticeships are Opportunities" *Department of Labor Blog*. Accessed (1/13/219) <https://blog.dol.gov/2019/11/15/apprenticeships-are-opportunities>

⁶ Helper et al. 2016. "The Benefits and Costs of Apprenticeships: A Business Perspective." United States Department of Commerce. Accessed 12/23/2019 (<https://files.eric.ed.gov/fulltext/ED572260.pdf>)

⁷ Ibid, 23.

apprentices to leadership positions, due to their knowledge of the training quality and first-hand experience with career-long, company-trained professionals.⁸

As for more immediate benefits, employers may find professional apprenticeships generate revenue. While there is a cost associated with the initial training at the start of an apprenticeship, this can be offset by the experienced apprentice's productivity. In short, apprentices are compensated at a lower rate than licensed professionals while often performing work of equal quality. Thus, professional apprenticeships often yield the employer returns between 40-50% above the costs of training.⁹ Of course, the employer's rate of return will be greater where a professional's compensation is disproportionately higher than that of the apprentice.

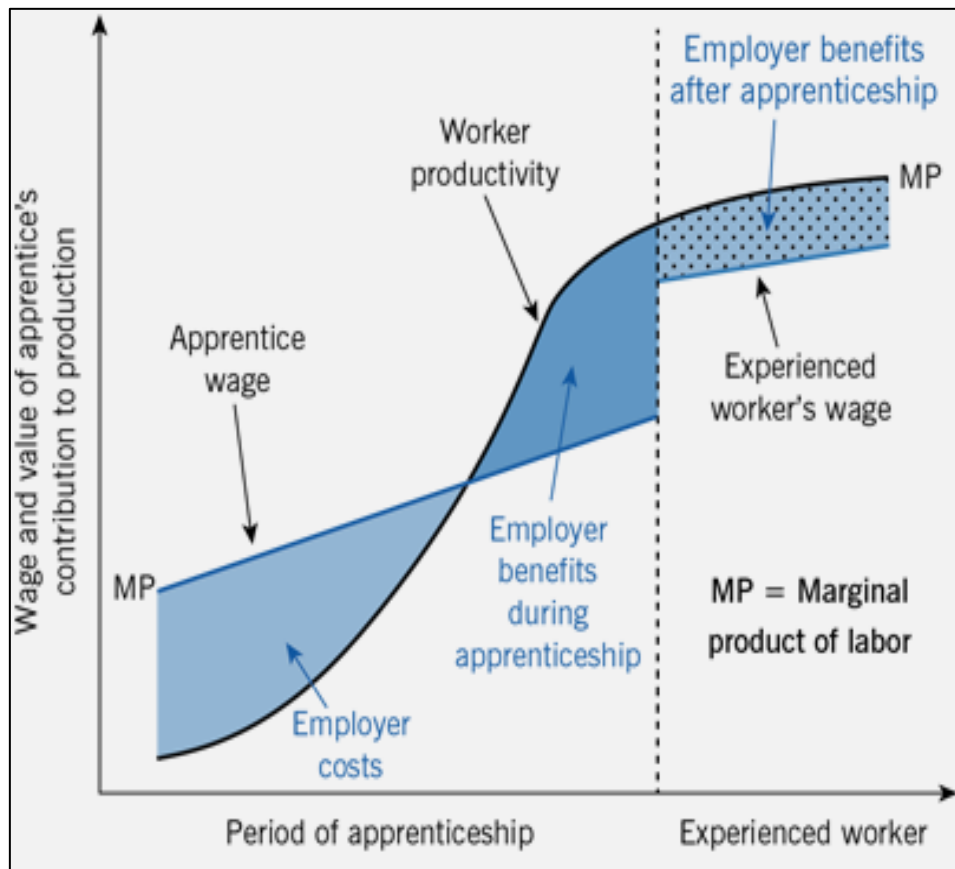


Figure One: A model of the employer's return from apprenticeship training. Source: <https://wol.iza.org/articles/do-firms-benefit-from-apprenticeship-investments/long> (12/15/19)

⁸ Ibid, 24.

⁹ Gambin, L., Hasluck, C., Hogarth, T. (2010) "Recouping the costs of apprenticeship training: Employer case study evidence from England" *Empirical Research in Vocational Education and Training* 2(2): 127–146.

Experiential Pathways & Professional Credentials

As stated, professional apprenticeships are experience-based pathways to professional credentials. However, not all experience-based pathways are formal apprenticeships. For the purposes of this report, findings comprise any experience-based pathway which functions as an alternative to often costly formal education. This includes informal training pathways applied retrospectively, as well as formal apprenticeships with prerequisite post-secondary education.

a. Prospective vs. Retrospective Experience-based Pathways to Licensure

While professional apprenticeships are a formal proactive approach to licensure, there are also retrospective experience-based pathways to professional credentials. Unlike formal apprenticeships, the retrospective pathway was initially designed for applicants who have already accrued a substantially equivalent experience for licensure, without formal education. That said, there are now applicants who proactively pursue retrospective experiential pathways to licensure. This is somewhat unsurprising as an individual who already meets many of the retrospective experiential pathway's criteria is likely to purposely complete said requirements.

The professional engineer's license provides an example of a retrospective pathway. An individual may be granted a professional engineer license in Vermont if they meet the following:

(4) Twelve years of engineering experience. A professional engineering license shall be issued to a person who:

(A) attains a passing score on a fundamentals of engineering examination recognized by Board rule;

(B) completes 12 years or more of progressive engineering experience of a grade and character that indicate to the Board that the applicant may be competent to practice engineering, at least six years of which shall be in the specialty discipline for which the license is sought;

(C) attains a passing score on a specialized examination recognized by Board rule testing the principles and practices of engineering in the specialty discipline sought; and

(D) satisfies all requirements set forth in the Board's rules.

— 26 V.S.A. Chapter 20, § 1182b

For regulators, there is little difference between applications based on apprenticeship or a retrospective pathway: in both cases the applicant must have worked under a qualified professional as well as pass the corresponding licensure exams. However, there are important distinctions for the applicant. First, very few regulated occupations which offer apprenticeship pathways will also offer a retrospective pathway. Moreover, retrospective pathways do not provide the stability of the apprenticeship arrangement: neither the employer nor the employee is contractually obliged to the other in a State-regulated training agreement. Thus, individuals who proactively choose the retrospective pathway are subject to the same instabilities as standard employees. Lastly, the retrospective experience requirements are generally much greater than those in formal professional apprenticeships, because there is no standardized training regimen. For these reasons, Vermont should prioritize the creation of formal professional apprenticeships over retrospective pathways.

b. Professional Apprenticeships with Prerequisite Post-secondary Educations

Although counterintuitive, there are professional apprenticeships which require a formal post-secondary education prior to the apprenticeship training. For example, the administrative rules for Nursing Home Administrators require both a baccalaureate degree and professional training:

2.2 License by Examination

- a) *To qualify to take the exam, the applicant must meet the following criteria:*
- 1) *be at least 18 years of age;*
 - 2) *hold at least a bachelor's degree from an accredited institution;*
 - 3) *violation of 3 V.S.A. § 129a may be grounds for denial or conditioning of a license under these rules;*
 - 4) *be mentally and physically able to perform as a licensed nursing home administrator;*
and
 - 5) *have completed an administrator-in-training program approved by the Director.*

— CVR 20-4-12: 2.2

Although occupations such as this require formal education, the supervised training is itself an alternative to what would otherwise be additional formal education. For this reason, and the fact that the Nursing Home Administrator credential is a regulated profession, these types of experiential pathways are included in this report.

c. The Department of Labor's Registered Apprenticeship Program

The Department of Labor operates the “registered apprenticeship” (RA) program. These are commonly called “big A” apprenticeships. RA’s are unique from other professional apprenticeship pathways because of certain formalized and standardized policies. For example, all registered apprenticeship programs require wage progression as the apprentice becomes more experienced. The wage progression is an attractive feature for potential applicants. However, mandatory wage progression excludes certain occupations such as barbering and cosmetology, which are largely commission-based employments. Professions which do not qualify for registered apprenticeships but utilize experiential learning, rely on apprenticeships through their regulatory agencies (e.g. barber and cosmetology apprenticeships are managed by the Office of Professional Regulation).

Nevertheless, the RA program is Vermont’s single largest formal apprenticeship provider. The Vermont Department of Labor’s RA program currently enrolls over 2,000 apprentices in 35 separate occupations (Appendix A). Most Vermont registered apprentices are in the plumbing and electrical fields. However, there are far more federally approved occupations for registered apprenticeship than currently offered in Vermont. While not all registered apprenticeships are in State regulated occupations, the program is an invaluable asset for regulating agencies.

d. The Appropriate Use of Experience-based Pathways to Professional Credentials

The experience-based pathway, either as a formal apprenticeship or otherwise, is not appropriate for all professional credentials. Oftentimes the classroom setting is the most effective environment in which to

instruct future professionals. For example, occupations which rely on large bodies of theory and conceptual knowledge, are not good candidates for the formal apprenticeship process. Instead, experience-based pathways are better suited to skills-based occupations where specialized knowledge does not require a broad multi-disciplinary or theoretical foundation, or where a supervised training is only possibly after formal education.

Likewise, there are some mandatory experience-based pathways which represent unnecessary obstacles to licensure. For example, Real Estate Salespersons who are pursuing a broker’s license must not only complete a formal 40-hour course, pass the brokerage exam, and complete at least 8 real estate transactions, but also work for 2 years under a licensed broker. There is little evidence to suggest that the 2-year employment period is necessary for public protection.¹⁰

Professional apprenticeships and other experience-based pathways are most useful as alternatives to formal educational requirements, not addendums. While Vermont should implement as many experience-based pathways to professional credentials as possible, regulators must not seek change for the sake of change itself. It is rare that experience-based pathways are a necessary *addition* to existing regulatory requirements. Where existing requirements meet training needs, experience-based pathways should be oriented toward providing equivalent and alternative training possibilities, not added training burdens atop existing requirements.

Experience-Based Pathways to Licensure in Vermont

Of the six Vermont State agencies participating in the Act 30 surveys, five report apprenticeship pathways to licensure in at least one regulated occupation. In total, there are 25 regulated occupations with either a formal apprenticeship or experience-based pathway to licensure. The Office of Professional Regulation, which is responsible for 144 out of the 178 Act 30 occupations (Appendix B) regulates 20 of the 25 occupations with experience-based pathways.

Table 1: Act 30 regulated occupations with experiential pathways to professional credentials.

	Agency	Apprentice Profession Type
	(AHS)	(Childcare Development Specialist)
1	ANR	Well Driller
2	AOE	Educator
3	DOH	EMS – Bennington County Pilot Program
4	DPS	Electrician
5	DPS	Plumber
6	OPR	Auctioneer
7	OPR	Barber
8	OPR	Body Piercing & Tattooist
9	OPR	Certified General Real Estate Appraiser
10	OPR	Certified Residential Real Estate Appraiser

¹⁰ Real estate salesperson and broker regulations are the subject of an ongoing 26 V.S.A. Chapter 57 regulatory review by the Office of Professional Regulation, and therefore are not included in this report’s recommendations.

	Agency	Apprentice Profession Type
11	OPR	Cosmetologist
12	OPR	Crematory Personnel
13	OPR	Crematory Removal Personnel
14	OPR	Engineer
15	OPR	Esthetician
16	OPR	Funeral Director
17	OPR	Landscape Architect
18	OPR	Nail Technician
19	OPR	Nursing Home Administrator
20	OPR	Optician
21	OPR	Permanent Cosmetic Tattooist
22	OPR	Pharmacy Tech.
23	OPR	Real Estate Broker
24	OPR	Tattooist
25	OPR	Wastewater Operators

Regulators such as the Agency of Natural Resources and the Agency of Education already have experiential pathways to licensure in both of their credentials. The Agency of Education offers both an educator apprenticeship pathway and a retrospective experience-based pathway through their peer review program.

The Department of Public Safety (DPS) works closely with the Department of Labor’s Registered Apprenticeship Program to coordinate apprenticeship training requirements. Historically the RA programs also included DPS “technically qualified persons” training for registered professionals in oil burning, gas burning, and similarly related occupations.

The Office of Professional Regulation oversees 80% of all Act 30 regulated occupations with experience-based pathways. This is in large part because OPR is responsible for the majority of regulated occupations in Vermont. While most of OPR’s apprenticeships and experience-based pathways are managed “in-house,” both Pharmacy Technicians and Wastewater Operators have registered apprenticeship opportunities with the Vermont Department of Labor.

Finally, the Agency of Human Services indirectly regulates childcare providers. There is currently a registered apprenticeship program for child care providers, although no corresponding professional credential exists. The Agency of Human Services has statutory authority for the regulation of childcare businesses. In an effort to protect Vermont’s children from the incompetent, the Child Development Division enforces employee education standards through regulations applicable to childcare businesses. As a result of this State-protected scope of practice, childcare providers are governed by rules that closely approximate professional licensing without creating a personal credential. For this reason, childcare providers are mentioned in the above table, though not counted in the list of officially regulated occupations.

Recommendations

We recommend the establishment of new experience-based pathways to licensure in three fields: acupuncturists, embalmers, and property inspectors.

Acupuncture: The acupuncture profession allowed an apprenticeship pathway until 2011. The requirements were a flexible combination of supervised practice hours, self-study, and/or formal education. The reason for this pathway's closure is unclear. There is no evidence to suggest that an experience-based pathway to licensure would affect a new professional's competency or quality of care.

Embalmers: The embalming profession is part of the funeral service occupations. The Vermont State Board of Funeral Service recently transitioned to an advisor regulatory model. Many of the funeral service occupations already allow apprenticeship pathways to licensure (funeral directors, crematory personnel, etc.). Given this profession's low risk of public harm, and high interest among professional leaders in facilitating low-cost in-state training opportunities, an experience-based pathway to licensure should be established for embalmers.

Property Inspectors: The property inspector profession currently requires 80 hours of education on the following subjects: heating systems; cooling systems; plumbing systems; electrical systems; structural components; foundations; roof coverings; exterior and interior components; and site aspects as they affect the building. There is no evidence to suggest that an apprenticeship or inspector-in-training program would not adequately prepare applicants for the property inspector license exam.

Conclusions

Occupational regulators in Vermont have already implemented many experience-based pathways to professional credentials. Regulators must judiciously evaluate if experience-based learning is suitable for existing regulated professions. Due to the benefits to the trainee and the employer, future proposals for occupational regulation or revisions to occupational statutes or rules should include assessment of opportunities to establish professional apprenticeships or other experiential pathways as an alternative to formal education.

Respectfully submitted to the House and Senate Committees on Government Operations, the House Committee on Commerce and Economic Development, The House Committee on Commerce and Economic Development, and the Senate Committee on Economic Development, Housing and General Affairs.

STATE OF VERMONT
SECRETARY OF STATE
OFFICE OF PROFESSIONAL REGULATION

BY:



Dylan Bruce
Senior Planner and Policy Analyst

January 15, 2020

Date

APPROVED:



S. Lauren Hibbert
Director OPR

January 15, 2020

Date

Appendix A: The Vermont Department of Labor’s active Registered Apprenticeships

ACTIVE APPRENTICEABLE OCCUPATIONS AS OF 12/31/2019

OCCUPATION	ENROLLED
1. Advanced Machinist Toolmaker	40
2. Carpenter	4
3. Childcare Development Specialist	79
4. CNC Machinist	36
5. CNC Machine Tool Maker	14
6. Construction Craft Laborer	17
7. Corrections Officer	192
8. Electrician	706
9. Emergency Medical Technician	8
10. HVAC Technician	9
11. Industrial Electrician	7
12. Insurance Associate	86
13. Insurance-Customer Service	4
14. Line Maintainer	70
15. LPN Pre-Apprenticeship	15
16. Machinist	1
17. Maintenance Electronics Technician	12
18. Maintenance Mechanic	9
19. Manufacturing Production Technician	5
20. Medical Assistant	2
21. Millwright	2
22. Motorcycle Mechanic	1
23. Painter	1
24. Pharmacy Technician	4
25. Phlebotomist	23
26. Plumber/Pipefitter	474

ACTIVE APPRENTICEABLE OCCUPATIONS AS OF 12/31/2019

OCCUPATION	ENROLLED
27. Police Officer	48
28. Sheet Metal Worker	31
29. State Trooper	55
30. Stone Mason	2
31. Tool & Die Maker	2
32. Toolmaker	7
33. Tramway Maintenance Technician	46
34. Wastewater Systems Operator	1
35. Water Heater Systems Hydronics Specialist	2

Appendix B: All Regulatory Agencies and Occupations Subject to Act 30 Surveys

Agency	Profession Type
AHS	After School Programs
AHS	After School Programs Employees
AHS	Child Care Center Employees
AHS	Child Care Centers
AHS	Home-Based Child-Care
AHS	Home-Based Child-Care Employees
ANR	Well Drillers
AOE	Educators
DOH	Anesthesiologist Assistants
DOH	Asbestos Abatement
DOH	Emergency Medical Personnel
DOH	Lead Abatement
DOH	MD Residents
DOH	Physician Assistants
DOH	Physicians
DOH	Podiatrist Residents
DOH	Podiatrists
DOH	Radiologist Assistants
DPS	Chemical Suppression Systems
DPS	Chimney Sweeps
DPS	Commissioned Boiler Inspectors
DPS	Elevator Inspectors
DPS	Elevator Mechanics
DPS	Electricians
DPS	Emergency Generator Installers
DPS	Fire Alarm Inspectors
DPS	Fire Sprinkler System Designers
DPS	Fire Sprinkler System Installers
DPS	Lift Mechanics
DPS	Natural Gas Installers
DPS	Oil Burner Installers
DPS	Plumbers
DPS	Polygraph Examiners
DPS	Propane Gas Installers
OPR	503B Outsourcer - Pharmacy
OPR	Accounting Firm
OPR	Acupuncturist
OPR	Advanced Practice Registered Nurse

Agency	Profession Type
OPR	Annual Event Permit - Motor Vehicle Racing
OPR	Applied Behavior Analyst
OPR	Apprentice Addiction Professional
OPR	Architect
OPR	Assistant Behavior Analyst
OPR	Athletic Trainer
OPR	Auctioneer
OPR	Auctioneer - Apprentice
OPR	Audiologist
OPR	Barber
OPR	Barber - Apprentice
OPR	Barber - Limited
OPR	Barber Shop
OPR	Body Piercing - Apprentice
OPR	Body Piercing & Tattooist - Apprentice
OPR	Body Piercing & Tattooist Operator
OPR	Body Piercing & Tattooist Shop
OPR	Body Piercing Operator
OPR	Body Piercing Shop
OPR	Certified Alcohol & Drug Abuse Counselor
OPR	Certified Apprentice Addiction Professional
OPR	Certified General Real Estate Appraiser
OPR	Certified General Real Estate Appraiser - Temporary License
OPR	Certified General Real Estate Appraiser - Trainee
OPR	Certified Public Accountant
OPR	Certified Residential Real Estate Appraiser
OPR	Certified Residential Real Estate Appraiser - Temporary License
OPR	Certified Residential Real Estate Appraiser - Trainee
OPR	Chiropractic Intern
OPR	Chiropractic Physician
OPR	Community Based Long Term Care Pharmacy
OPR	Cosmetologist
OPR	Cosmetologist - Apprentice
OPR	Cosmetology Shop
OPR	Crematory Establishment
OPR	Crematory Personnel
OPR	Dental Hygienist
OPR	Dentist
OPR	Dietitian
OPR	Electrologist

Agency	Profession Type
OPR	Electrology Office
OPR	Embalmer
OPR	Engineer Intern
OPR	Esthetician
OPR	Esthetician - Apprentice
OPR	Forester
OPR	Funeral Director
OPR	Funeral Director Apprentice
OPR	Funeral Establishment
OPR	Hearing Aid Dispenser
OPR	Hearing Aid Dispenser - Temporary License
OPR	In-State Manufacturing Drug Outlet
OPR	Instate Pharmacy
OPR	Institutional Pharmacy
OPR	Investigation & Research Project Pharmacy
OPR	Ionizing Radiation Privileges (Physicians)
OPR	Land Surveyor
OPR	Landscape Architect
OPR	Licensed Alcohol & Drug Abuse Counselor
OPR	Licensed Clinical Mental Health Counselor
OPR	Licensed Independent Clinical Social Worker
OPR	Licensed Marriage and Family Therapist
OPR	Licensed Master's Social Worker
OPR	Licensed Nursing Assistant
OPR	Licensed Practical Nurse
OPR	Licensed Practical Nurse - Temporary Permit for Re-Entry
OPR	Licensed Private Investigator - Transient Practice
OPR	Licensed Private Investigator and/or Security Guard
OPR	Licensed Private Investigator/Security Instructor
OPR	Licensed Real Estate Appraiser
OPR	Limited Temporary Osteopathic Physician
OPR	Midwife
OPR	Nail Technician
OPR	Nail Technician - Apprentice
OPR	Naturopathic Physician
OPR	Non-Licensed & Non-Certified Psychotherapist
OPR	Non-Resident Accounting Firm with Mobility
OPR	Non-Resident Pharmacy
OPR	Notary Public
OPR	Nuclear Medicine Technologist

Agency	Profession Type
OPR	Nuclear/Radiologic Pharmacy
OPR	Nursing Home Administrator
OPR	Nursing Home Administrator-in-Training
OPR	Occupational Therapist
OPR	Occupational Therapy Assistant
OPR	Occupational Therapy Assistant - Temporary License
OPR	Optician
OPR	Optician - Trainee
OPR	Optometrist
OPR	Osteopathic Physician
OPR	Out of State Tele-pharmacist
OPR	Permanent Cosmetic Tattooist
OPR	Permanent Cosmetic Tattooist - Apprentice
OPR	Pharmacist
OPR	Pharmacy Intern
OPR	Pharmacy Technician
OPR	Physical Therapist
OPR	Physical Therapist Assistant
OPR	Pollution Abatement Facility Operator
OPR	Pollution Abatement Facility Operator Provisional
OPR	Private Investigative & Security Services Agency
OPR	Private Investigative & Security Services Agency - Sole Proprietor
OPR	Private Investigative Agency
OPR	Private Investigative Agency - Sole Proprietor
OPR	Professional Boxing Judge
OPR	Professional Engineer
OPR	Property Inspector
OPR	Psychoanalyst
OPR	Psychologist - Doctorate
OPR	Psychologist - Doctorate - Temporary License
OPR	Psychologist - Master
OPR	Radiation Therapist
OPR	Radiologic Technologist (Radiography)
OPR	Radiologic Technologist Limited License
OPR	Real Estate Broker
OPR	Real Estate Brokerage Firm - Branch Office
OPR	Real Estate Brokerage Firm - Main Office
OPR	Real Estate Salesperson
OPR	Registered Appraisal Management Company - Branch Office
OPR	Registered Appraisal Management Company - Main Office

Agency	Profession Type
OPR	Registered Certified Dental Assistant
OPR	Registered Nurse
OPR	Registered Private Investigative/Security Employee
OPR	Registered Public Accountant
OPR	Registered Traditional Dental Assistant
OPR	Removal Personnel
OPR	Respiratory Care Practitioner
OPR	Respiratory Care Practitioner - Student
OPR	School of Cosmetology
OPR	Security Services Agency
OPR	Speech-Language Pathologist
OPR	Speech-Language Pathologist - Provisional
OPR	Tattooist - Apprentice
OPR	Tattooist Operator
OPR	Tattooist Shop
OPR	Third Party Logistics Provider - Pharmacy
OPR	Unlimited Event Permit - Motor Vehicle Racing
OPR	Veterinarian
OPR	Wastewater/Water System Designers
OPR	Wholesale Drug Outlet