



Michigan Backflow Prevention Assembly Tester Credentials

Frequently Asked Questions

July 2023

The following questions relate to the joint [interpretive statement](#) by the Michigan Department of Licensing and Regulatory Affairs (LARA) Bureau of Construction Codes (BCC) and the Michigan Department Environment, Great Lakes, and Energy (EGLE). The statement was sent on July 13, 2023, via a LARA email subscription list to licensed plumbers.

- **What is EGLE's involvement in this issue?**

EGLE's Drinking Water and Environmental Health Division (DWEHD) regulates cross connection control programs at public water supplies. One requirement of a cross connection control program is the testing of backflow prevention assemblies. This issue impacts who can legally test backflow prevention assemblies in Michigan and, therefore, impacts public water suppliers and EGLE's approach to determining compliance.

- **What prompted this change?**

There has been no change in the law. A question was raised to the State Plumbing Board regarding what activities constitute the practice of plumbing under the Michigan Skilled Trades Regulation Act, 2016 PA 407, as amended, (STRA). According to the BCC's interpretation, the practice of plumbing includes the testing of backflow prevention assemblies.

- **When does this go into effect?**

There has been no change in the STRA, so it is in effect now. However, EGLE acknowledges the impact this change in interpretation will have in some parts of the state and intends to allow a phase-in period before we actively pursue enforcement. EGLE has already contacted some state testing schools so they

can make their prospective students aware. EGLE will also provide notification to public water supplies separately when our full implementation plan is determined.

- **Who made this change?**

There has been no change in the STRA. However, based on the question raised to the State Plumbing Board and review of the STRA and the Michigan Plumbing Code, the BCC came to this conclusion.

- **Does this mean I cannot test backflow preventers anymore?**

That depends on an individual's credentials. For a public water supply official to accept backflow prevention testing results, the tester must be a master plumber, journey plumber, or apprentice plumber working under direct supervision of a journey plumber or master plumber and have a valid American Society of Sanitary Engineers (ASSE) 5110 certification.

- **Do I still need ASSE-5110 certification to test in Michigan?**

Yes. For a public water supply official to accept backflow prevention testing results, the tester must be a master plumber, journey plumber, or apprentice plumber working under direct supervision of a journey plumber or master plumber and have a valid ASSE 5110 certification. Refer to [Rule 1405 \(R 325.11405\) of the Michigan Safe Drinking Water Act](#), 1976 PA 399, as amended (SDWA).

- **If I am not a licensed plumber, does this mean I lose my ASSE 5110 certification?**

No. Anyone who qualifies and earns their ASSE 5110 certification can retain the certification if continuing education requirements are met, and the certification is not revoked. The state of Michigan has no authority to issue or revoke certifications issued by the ASSE. However, the ASSE 5110 certification alone will not allow individuals to test in Michigan. If you test in other states, check with the applicable state agency for requirements in that state.

- **If I am not a licensed plumber, but have my ASSE 5110 certification, can I test backflow preventers within a building that I, or my company, own?**

According to the BCC's interpretation of the STRA, there are no exceptions or provisions for this situation. If your building is classified as a public water supply or is served water by a public water supply, backflow prevention assembly testing can only be done by an individual who is a master plumber, journey plumber, or apprentice plumber working under direct supervision of a journey plumber or master plumber and has a valid (ASSE 5110 certification).

Individuals testing with a fraudulent ASSE 5110 certification or using testing/reporting methods contrary to ASSE Standard 5110 should be reported by filing an “ASSE Professional Certification Program Complaint Form” to the ASSE’s Testing and Credential Services.

- **I do not agree with this interpretation - what recourse do I have?**

You can direct questions and comments regarding licensing requirements in the STRA to the BCC at LARA-BCC-Licensing@Michigan.gov or 517-241-9313. For concerns related to wording of the STRA you can contact your Michigan legislative representatives to advocate for changes.