



Michigan Backflow Prevention Assembly Tester Credentials

Frequently Asked Questions

Revised August 30, 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. Therefore, public water supplies are advised by EGLE to ensure local testing activity is in accordance to the law. However, EGLE acknowledges the impact this interpretation will have in some parts of the state and the public health importance of testing backflow preventers. EGLE intends to allow a phase-in

period of 12 months (July 31, 2024) before we actively pursue enforcement under the Safe Drinking Water Act (SDWA). EGLE has also contacted state testing schools so they can make their prospective students aware.

- **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 SDWA, 1976 PA 399, as amended.

- **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.

- **How will this be enforced?**

Primarily, this will be enforced locally by public water supply officials when requiring water customers to test backflow prevention assemblies. Upon receiving documentation of backflow preventer testing results, public water supply officials must verify individual tester credentials. Public water supplies are regulated by EGLE under the authority of the SDWA and must follow the rules under Part 14 of the SDWA related to their local cross connection control programs. If public water supplies knowingly accept backflow prevention assembly testing results from unqualified testers after the transition period, EGLE has the authority to take enforcement action against the public water supply. Licensing requirements related to plumbers and plumbing work are enforced by the DLARA's BCC.

- **This will cause a tester shortage and/or price gouging. What is the state going to about that?**

EGLE acknowledges the impact this may cause in parts of the state related to tester availability and possible increased costs of testing. EGLE has no authority over what private companies charge for testing. However, we are working with the ASSE and the BCC to determine what resources we can provide to help customers shop for local testers. To promote a fair market, EGLE also encourages public water supplies to educate local testers and their water customers on the purpose, meaning of, and typical costs of assembly testing.

To verify a plumbing license in Michigan, navigate to the following website and click on "Plumber" under the "Skilled Trades" heading: [Find / Verify a Licensed Professional or Business \(michigan.gov\)](https://www.michigan.gov/verify)

To verify an ASSE 5110 certification in Michigan, navigate to the following website and use the search options for state, last name, and certification type: [ASSE International \(iapmo.org\)](https://www.asseintl.org).

- **What if Michigan residents and business owners cannot find testers with the necessary credentials in their area?**

First, they should contact their local public water supply. The public water supply may be able to provide testing contacts or provide an extension to their testing deadline. If water supplies experience a regional shortage of testers, they should contact their [local EGLE district office](#).

- **How do I report individuals who are testing without proper credentials?**

Individuals testing or conducting other activities such as backflow preventer repairs or installation without a plumbing license should be reported to LARA BCC at: LARA-BCC-Compliance@Michigan.gov or 517-241-0130. They may use the [Statement of Complaint form](#) to report these issues.

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.