

8/21/2018 8:48:06 AM

Mel Henderson

Boise Idaho

Idaho Occupational Therapy Association, President

To the Idaho State Department of Education: Thank you for allowing public comment on this very important issue facing occupational therapy practitioners in our Idaho public schools. We applaud the efforts you have made to ensure quality care delivery to the students of this state. However, there is a scarcity of qualified OTs and OTAs in every practice setting in Idaho and placing additional undue burden on those who practice in the schools will not help in the delivery of important services to the students who are in need of such services. We thank you and agree with the language changes made thus far. The following is our input regarding proposed rules Docket No: 08-0202-1801. 060.02.d. (pg 52) Pupil Service Staff Certificate holders who hold a professional license through the Idaho Bureau of Occupational Licenses may use continuing education units applied toward the renewal of their professional license toward the renewal of the Pupil Service Staff Certificate. Fifteen (15) continuing education units are equivalent to one (1) semester credit. According to state licensure rule, "a CEU is a measurement of the licensee's participation in a Board-approved continuing education activity. One (1) CEU requires ten (10) contact hours of participation in a Board-approved continuing education program, excluding meals and breaks. One (1) contact hour equals one (1) clock hour for purpose of obtaining CEUs." By IBOL definition, requiring 15 CEUs would equal 150 hours of training per renewal cycle. We suggest changing the requirement to 15 contact hours of IBOL-approved professional development activities. Thank you for considering our input. Sincerely, Mel Henderson, MS, OTR/L, MBA IOTA, President 208.297.0600