AGENDA ITEM 4

PUBLIC COMMENT FOR ITEMS NOT ON THE AGENDA.

Public Comment received via email

Hi Jody,

I hope this message finds you well! I'm trying to find out some information related to OT scope of practice within California and am hoping you can point me in the right direction...

I am interested in the ability of occupational therapists working in pelvic health to perform internal assessments on clients. I know that states/countries vary on whether or not OTs are allowed to do internal exams and I have believed that California regulations do allow for this. However, I can't find the language on it anywhere in the OT Practice Act or CA Code of Regulations.

Would you happen to be able to point me in the right direction?

Warmly,

C.D.R, OTD, OTR/L

Public Comment #2 received via email

Dear Ms. Martin,

I am writing in regard to Items #11 and #12 on the agenda for November 3, 2022. Item #11 addresses the potential for a doctoral capstone supervisor to receive PDU's. While not a traditional fieldwork experience as we know it, to supervise, I perceive this would require a significant investment in time. Item #12 addresses identification of limits for the supervision of students. There are many role configurations possible in student supervision.

I am respectfully requesting that the Board consider bringing these items back to a future meeting in which the public could participate remotely. This would provide the opportunity to hear the Board's perspectives and provide public comment accordingly.

With appreciation,

A.B.H. MA, COTA/L

Public Comments regarding fees received via email

1)

To whomever it may concern,

My name is XXX and I am a second-year OTS at XXXX

I do NOT support increasing licensing fees for new graduates. While we understand the need for licensing fees, the increase will disproportionately impact recent graduates, who recently worked for 6 months without income and have accumulated student debt.

This change will disproportionately impact students from lower socio-economic backgrounds who do not have familiar financial and environmental supports. The OT profession already suffers from high rates of burnout, **affecting your financial bottom line**. Please give our new graduates a chance to start their new profession with a lighter load, ultimately paying for more years of licensure.

Please consider reducing the cost of the prorated licensure by 50% for new graduates.

2

To Whom It May Concern:

I am writing on behalf of myself and my fellow second-year OT students at San Jose State University to voice my concerns for rising renewal fees for OTs. As a graduate school student, I do not have time to secure and work a full-time job. I have incredulous student loan debt from OT school and assume I will not be able to have a stable income for at least another year until I obtain my first job after passing the NBCOT exam. I kindly suggest the board reconsiders their proposed increase in fees for novice OTs, as we are brand new to the work force, and some of us are struggling financially. Perhaps cutting the fees in half for new practitioners would be fair and just.

Thank you for your time and consideration with this matter.

3)

Dear California Board of Occupational Therapy,

As a current Master of Science in OT graduate student, I'm writing to you concerned about the anticipated increase in licensing fees. I attended your OTAC conference 2022 presentation. Although I understand the need to increase licensing fees generally, I strongly do not support the increase for first-time licensees. I deeply believe that the initial licensing fee should be reflective of the fact that students, like myself, may not be earning any money when the fee is due. Moreover, students may be in a financial deficit due to the costs of recently pursuing their graduate degree, which involves 6 months of unpaid full-time fieldwork, as well as paying for the NBCOT exam. Personally, I am currently experiencing financial hardship during my graduate program; I know that I will be in an even more challenging financial situation by the time I graduate, complete my NBCOT exam, and apply for licensure. With these challenges in mind, please consider not increasing the licensing fee for initial licensure.

4)

To Whom it May Concern,

I am writing to express my concern regarding the current proposal to raise initial practitioner licensing fees. I am a current OT graduate student, and know the financial impact of this decision will have on my eligibility to apply for licensure. I urge you to please consider the financial state of individuals who are not generating income at the time of this process and are already struggling to pay for school tuition fees, living expenses, travel expenses to fieldwork locations, certification exam fees, etc. Thank you for your consideration of these important factors directly impacting current students and prospective OTs undergoing the requirements for certification and the licensure process.

5)

To whom it concerns,

I am a current Occupational Therapy student at San Jose State University. I recently learned there is a pending rise in the cost of licensure and I do not support this change. Please keep the first-time licensure fees affordable. As a student, raising the cost of licensure will cause hardship for myself and many students I know. Unemployed new graduates will find this rising cost challenging. Even those who are working are also in a bind due to the challenges of navigating work under a provisional license and studying for the NBCOT. Thank you for considering the needs of new graduates.

6) To Whom it May Concern,

I am writing today because I do NOT support the increase in licensing fees for recent occupational therapy graduates. The impending increase in licensing fees will disproportionately impact recent graduates, as they are most likely coming off of at least six months of unemployment in addition to accumulating student debt. It is unfair to expect this population to pay the same rate for their initial licensing fee. If we are to adhere to the values of occupational therapy, we would create equitable access to licensure. My request is for CBOT to consider reducing the cost of the first 12 months (including the prorated time period) of licensure by 50% for new OT graduates.

Thank you for your consideration.

7)

To whom it may concern,

I am writing to strongly oppose the increase of licensing fees (first-time fees) for new graduate students. We as students and future practitioners are already burdened with the high costs of education, the high cost of living in a privileged state, 6 months of unpaid labor during fieldwork placements, and not to mention the costs of the exam. Please keep the future of this profession in mind and consider how this will affect tomorrow's practitioners.

Thank you for your time and consideration.

8) Hello.

My name is XXXX. I am currently in my 2nd Year at XXXX. I am an upcoming graduate excited to practice in this amazing field of occupational therapy. I have attended the OTAC conference and learned that there will be an increase in licensing fees for practitioners. I write this letter to request that the increased fees do not affect new graduates as we will be accumulating debt through school and 6 months of full-time unpaid fieldwork.

Locating loans and finding affordable housing for the 6 months of fieldwork has already been a difficulty and a large stressor in my life. Even with a provisional license, it will not be sustainable to have a full-time job, pay for school loans, and study for the NBCOT, then have to pay for the OT license.

Thank you for your time.

9) Hello.

I am writing regarding the upcoming increase in licensing fee for newly licensed OTs to express that I do not support this increase as a second year MSOT student. Because new OTs have been in school for so long without income, this additional cost for licensing can cause a great burden. I am writing to ask that CBOT consider adjusting the initial licensing fee to reflect the fact entry level clinicians have not been able to earn close to the same income as practicing OTs after two years of school and six months of unpaid fieldwork.

Thank you for taking the time to consider this matter.