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Montgomery, Cynthia

**From:** Dolhi, Cathy <CDolhi@Chatham.edu>  
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**To:** ST, RegulatoryCounsel  
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I would like to express my continued concern about the language related to professional liability insurance for individuals applying for a temporary occupational therapy license. As an Academic Fieldwork Coordinator, I frequently interact with students who want to obtain a temporary license prior to completing the certification examination so that they are prepared in the event that they are able to find employment. As a temporary licensee without employment, they obviously are not covered under an employer's liability policy.

Section 42.15 "Application for temporary license" indicates that:

*(c) The Board may also issue a temporary license to an applicant who:*

.....

*(d) In addition to the requirements in subsection (a) or (c), an applicant for a temporary license as an occupational therapist shall submit one of the following:*

.....

.....

*(3) A certification from the applicant indicating that the applicant will be covered by an employer against professional liability in the amount specified in 42.62(a) effective upon the beginning of employment.*

My interpretation of (3) above is that rather than provide a liability certificate, the temporary licensee applicant can submit a statement indicating that once they are employed, they will be covered. If my interpretation is correct, I would suggest that the same statement be included on the license application form and that an appropriate "certificate" be offered for completion.

If my interpretation is incorrect, I would suggest that the language be revised so that there is no misconception about the intent.

Because I was involved in the original discussions about incorporating this language into the Occupational Therapy Practice Act, I am well aware that there was significant conversation about the new graduate who was not employed at the time they were applying for a temporary license. I thought that #3 (above) was intended as a mechanism for those individuals to get the temporary license and submit the proof of liability after they secured employment.

Thank you for your consideration,

Cathy Dolhi, OTD, OTR/L, FAOTA