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Information/Action

Certification Committee

Occupational Therapy and Physical Therapy Services Credential: Necessity and Feasibility Discussion

Executive Summary: This agenda item explores the need for and feasibility of requiring occupational therapists and physical therapists to hold a California credential in order to provide services in public schools. The item provides background on the role of occupational and physical therapists in California's public schools, summarizes previous attempts by interest groups to create a credential, and discusses the pathways and potential impacts of establishing such a credential.

Recommended Action: Staff recommends that the Commission consider whether establishing and requiring an Occupational Therapist and Physical Therapist credential is necessary and feasible in order to best serve the students of California, and direct staff on any next steps.

Presenter: Erin Skubal, Director, Certification Division

Strategic Plan Goal

II. Program Quality and Accountability

- a) Develop and maintain rigorous, meaningful, and relevant standards that drive program quality and effectiveness for the preparation of the education workforce and are responsive to the needs of California's diverse student population.

Occupational Therapy and Physical Therapy Services Credential: Necessity and Feasibility Discussion

Introduction

This agenda item explores the need for and feasibility of requiring occupational therapists and physical therapists to hold a California credential in order to provide services in public schools. The item provides background on the role of occupational and physical therapists in California's public schools, summarizes previous attempts by interest groups to create a credential, and discusses the pathways and potential impacts of establishing such a credential.

Background

The Commission has been asked by many in the occupational and physical therapy sector to consider development of a credential for individuals that serve as Occupational Therapists (OTs) and Physical Therapists (PTs). Requests for a credential are based on a desire for individuals serving as OTs or PTs to advance in their careers, enter the certificated employee salary scale, and hold Administrative Services positions. Currently, there is no credential requirement for OTs and PTs to serve in California's public schools. There is also no avenue for such individuals to obtain an Administrative Services Credential, as the statutory requirements for the credential require possession of a teaching or services credential issued by the Commission. The lack of a pathway for OTs and PTs who provide Special Education related services in the public schools prevents these educators from being able to take on certificated leadership roles, as a basic credential is required for OTs and PTs to gain access to an administrative credential under current law.

Those that support creation of an OT and PT credential cite additional benefits of requiring a credential. A joint letter from the Occupational Therapy Association of California and the California Physical Therapy Association states some of these additional benefits:

"A basic credential certifies well prepared and exceptionally qualified educators to inspire and prepare students to reach their highest potential. An OT PT credential will acknowledge the existing high-quality professional standards inherent in OT PT accredited educational standards and licensure requirements to serve the complex needs of children in California schools. The credential has the potential to expand the scope of leadership and administrative expertise in the public education system.

Benefits to the public school system include increased opportunities for recruitment and retention of occupational therapists and physical therapists (current shortage of OT and PTs) who often leave school-based practice to devote expertise to rehabilitation and university settings where the barriers to advancement and leadership do not exist."

Occupational and Physical Therapy in Schools

Occupational therapy and physical therapy are designated services that are sometimes identified by a student's Individualized Education Program (IEP). Such services fall under the umbrella of related services as defined in [Education Code section 56363](#), and are required in order to assist an individual with exceptional needs to benefit from special education. Local Education Agencies (LEAs) currently employ OTs and/or PTs as either classified staff or contracted employees to serve in non-classroom based assignments. The California Department of Education's California Longitudinal Pupil Achievement Data System (CALPADS) documentation defines OTs as "a healthcare professional employed by a local educational agency trained to treat injured, ill, or disabled patients through the therapeutic use of everyday activities. They help these patients develop, recover, improve, as well as maintain the skills needed for daily living and working." Similarly, PTs in the public schools are defined as "a health care professional employed by a local education agency who is trained in the treatment of disease, injury, or deformity by physical methods such as massage, heat treatment, and exercise." In the 2019/2020 school year, LEAs reported 76 OT assignments, and 95 PT assignments in their CALPADS reporting to CDE.

Current Licensing for Occupational and Physical Therapists

Historically, these services have been provided in public schools by OTs and PTs that are licensed by their respective boards within the California Department of Consumer Affairs – the [Board of Occupational Therapy](#) for OTs, and the [Physical Therapy Board of California](#) for PTs. Much like the teaching profession, licensed PTs are required to graduate from a professional degree program at an accredited postsecondary institution, or institutions approved by the Physical Therapy Board, complete a professional education program including academic course work and clinical internship in physical therapy, and pass the Federation of State Boards of Physical Therapy examination. The same is true for OTs, who must complete an accredited university program with a bachelor's or master's degree in an occupational therapy related field, including a 24 week internship and passage of the Occupational Therapist Registered (OTR) exam.

Previous Efforts Towards Licensure of Occupational and Physical Therapists

Over the past five years, several bills have been introduced to add licensure requirements for OT and PT services. None of these proposals successfully made it through the legislative process. A summary of these attempts is provided below.

AB 1087 (Irwin, 2017)

This bill would have required the Commission to develop a services credential with a specialization in occupational therapy or physical therapy. The author's office pulled the bill from consideration in the Assembly Education committee before its first public hearing and the bill died in committee. According to the Occupational Therapy Association of California and the California Physical Therapy Association, the bill was pulled due to opposition by the California School Employees Association (CSEA, Classified Union). The author was advised to revise the bill and resubmit it with a new author.

AB 2386 (Blanca Rubio, 2018)

This bill was initially submitted as a proposal to authorize the Commission to design a services credential for OT and PT. The terms of the bill were amended to require the Commission to form a workgroup of stakeholders to study whether a credential is warranted and make recommendations to the Legislature, Governor, and State Superintendent of Public Instruction. The measure was held under submission by the Assembly Appropriations Committee and died in committee.

https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201720180AB2386

AB 2684 (Blanca Rubio, 2020)

This bill was a reintroduction of AB 2368 and would have similarly required the Commission to convene a workgroup, as provided, to consider whether the development of a services credential with a specialization in occupational therapy or physical therapy services is warranted. As was the case with many bills from the 2020 legislative session that were not directly related to the COVID-19 pandemic, the bill was not granted a hearing in the Assembly Education Committee and died in committee before receiving its first public hearing.

https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201920200AB2684

Educational Partner Feedback

To help better understand what need for increased preparation for OTs and PTs exists, staff requested input from LEAs on their assessment of the need for additional preparation and credentialing for OTs and PTs. The survey, which can be found in the [Appendix](#), garnered a total of 74 respondents from county offices of education, school districts, school sites, and charter school management agencies. When asked if the pool of candidates for OT and PT positions are adequately prepared to serve students in a preK-12 setting, the overwhelming majority of respondents (90.5%) indicated that the pool of candidates for OT and PT positions are adequately prepared to serve students in a preK-12 setting.

Respondents were also asked if they support adding a credential requirement for individuals serving as OTs and PTs in public schools. The table below shows the breakdown of responses based on the type of LEA.

Would your LEA support the idea of requiring OTs and PTs to obtain a credential in addition to existing licensing requirements, similar to the additional requirements for School Nurses and Speech-Language Pathologists?

	Number of Respondents	Do Not Support Credentialing for OTs and PTs	Support Credentialing for OTs and PTs
County Office of Education	21	85.7% (18)	14.3% (3)
Large School District*	18	77.8% (14)	22.2% (4)
Medium School District*	13	100% (13)	0% (0)
Small School District*	10	90% (9)	10% (1)

Charter School Management Agency	7	42.9% (3)	57.1% (4)
School Site	4	75% (3)	25% (1)
State Special School	1	100% (1)	0% (0)
Total	74	82.4% (61)	17.6% (13)

**Large School District defined as having average daily attendance of at least 10,000.*

**Medium School District defined as having average daily attendance of at least 2,500 but not more than 9,999.*

**Small School District defined as having average daily attendance of 2,499 or less.*

The majority of respondents (82.4%) did not support efforts to credential OTs and PTs. Many respondents cited the current difficulties in recruitment of these positions as a primary reason for lack of support, indicating that adding a credential to the requirements for employment would further reduce a limited candidate pool. Others felt that OTs and PTs already complete rigorous preparation and licensure requirements, and adding additional burdens were unnecessary. One respondent stated:

“OTs and PTs receive significant training and development for their licenses and become true experts in the fields. Through our internal interview processes, we are able to accurately identify how that expertise translates to work in schools with children. Requiring a credential would dissuade many talented individuals from pursuing work in schools due to the corresponding time and financial commitments. OTs and PTs would be compelled to work in the private sector, where compensation is already more lucrative for them. The state of California would face a drastic shortage in OTs and PTs if this decision is made.”

Of the 13 LEAs that expressed support for requiring an OT or PT to hold a credential, the reasons ranged from increased knowledge of working in the schools, to increased recruitment opportunities and promotion availability. One respondent stated:

We will have a pool of candidates and entry level PT/OT staff that (sic) more well prepared. With the rise of needs of OT in the school setting, new OT/PT in the school-based setting will have a better understanding of the school system especially the IEP process and the role of PT/OT in the schools. PT and OT are medical health providers just like nurses and SLPs. OT/PT profession has a very wide variety of settings that they can practice. Having this credential will prepare new candidates to work in the educational setting. Specifically for OTs, this will provide educational staff better understanding of the scope of practice for occupational therapist. OTs are one of the few school staff that have knowledge based in mental health. This OT scope of practice is under-utilized. At this time, where Social-Emotional Learning (SEL) is being push(sic) to be addressed in the schools, OT can play a big role to better serve our students.

Staff also sent a similar survey for response by program sponsors to gauge the capacity for programs to develop new OT and/or PT programs. This survey, which can again be found in the [Appendix](#), saw 11 total responses. The survey asked program respondents to gauge their

capacity and desire to offer preparation programs for OTs and/or PTs. Responses in this area were split, with three institutions indicating that they would be interested in exploring this opportunity, two stating that they might be interested, depending on capacity and interest from candidates. The majority of institutions (six) indicated that they had no interest in offering such programs at this time.

Potential Impacts of Creating Occupational and Physical Therapist Credentials

Identification of the correct type of credential for authorization of OT and PT services is only the first area that needs reflection. Consideration of what knowledge, skills, and abilities are currently lacking in the existing occupational licensure requirements for OTs and PTs must occur before the Commission can assess the potential need for this credential. While credentialing these services may provide benefits to the individuals serving in these positions, such as pathways into serving as administrators and consideration as certificated employees, the Commission is tasked with considering what, if any, knowledge, skills, and abilities are lacking for OTs and PTs to serve students in their current capacity in order to identify what additional preparation would be required to earn a credential.

Staff has identified some areas of potential impact that could occur with the creation of credentials for OTs and PTs, many of which were identified through the educational partner surveys. The items below should be evaluated as the Commission considers adding these credentials.

Benefits:

- Additional, targeted preparation for service to students and employment in a school setting.
- Employment as Certificated staff, as opposed to current employment as Classified staff.
- Eligibility for the Administrative Services Credential and Administrative positions.

Areas of Concern:

- Reduction in eligible pool of candidates in an already impacted and hard-to-recruit for area of work.
- Additional workload for the Commission to develop Program Standards and accredit programs.
- Additional costs for OTs and PTs to compete preparation and apply for licensure.
- Potential lack of programs available for candidates, which would further impact supply.
- Little agreement on there being a lack of knowledge, skills, and abilities in existing OTs/PTs to justify additional credential requirements. While some LEAs identified areas that OTs and PTs lack, many stated that the existing pool of candidates are appropriately prepared for their roles in the schools.
- Critical impacts on rural and small districts that have limited resources and ability to recruit.

Credentialing Pathway for Occupational and Physical Therapists

The Commission currently issues the Clinical and Rehabilitative Services (CRS) Credential in either Audiology or Orientation and Mobility, and [Education Code \(EC\) section 44268](#) gives the Commission the authority to designate the services which can be offered by the credential. Because occupational and physical therapy services are both considered rehabilitative support services, staff has identified the CRS Credential as the best vehicle to pursue Commission licensure for these services should the Commission decide to establish a credential for OT and PT. This pathway would allow the Commission to develop the credential through the regulatory process and would not require changes to statute.

Staff also explored the option of an OT and PT credential under the Health Services Credentials, which currently includes School Nurse Services Credentials, however the statutory language in [EC 44267](#) that authorizes Health Services Credentials clearly states that “Services as an audiometrist, occupational therapist, or physical therapist are not deemed health services within the meaning of this section.” As such, this option could not be pursued without legislative changes to this section of statute.

Staff Recommendation

Staff recommends that the Commission consider whether creating and requiring an Occupational Therapist and Physical Therapist credential is necessary and feasible in order to best serve the students of California, and direct staff on any next steps.