



Keck Graduate Institute
535 Watson Dr.
Claremont, CA 91711

February 2, 2022

Tine Sloan, Chair
California Commission on Teacher Credentialing
1900 Capitol Avenue
Sacramento, CA 95822

Dear Commissioner Sloan,

I am writing on behalf of Keck Graduate Institute to **urge the Commission on Teacher Credentialing to establish a Clinical or Rehabilitative Service Credential for occupational therapists (OT) and physical therapists (PT)**. The current credential oversight and status issue for OTs and PTs marginalizes qualified professionals who have provided invaluable services to students in California public schools for over 30 years.

As one of the Claremont Colleges, Keck Graduate Institute's mission is to enrich society with breakthrough approaches to education and translational research in healthcare and the life sciences. Our developing occupational therapy doctorate (OTD) program aims to prepare graduates for to be innovators and scholars of practice to meet current and future needs of society. We plan on providing a robust pediatric curriculum, including school-based practice, because of the complexity of the work and need for qualified professionals.

To provide equitable opportunities with comparable service providers (e.g. psychologists, speech and language pathologists, audiologists, counselors, school nurses, and social workers) who are already credentialed by the Commission, credentialing OTs and PTs will help recruit, hire, and retain highly qualified therapists and open new opportunities. A credential signifies an elevated level of professionalism within the educational system and validates status as highly qualified service providers. OTs and PTs possess master's and doctoral graduate level degrees, require supervised clinical experience, are licensed by the State of California, and are required to complete ongoing professional development in order to maintain licensure. These professions therefore have the training to meet the basic credentialing requirements and are deserving of a credential status.

Specifically, OTs and PTs currently meet the requirements for a services credential (Section 44268. (Enacted by Stats. 1976, Ch. 1010.) Cite as: Cal. Educ. Code §44268.) The minimum requirements for a services credential in a specialization in clinical or rehabilitative services are: (a) A baccalaureate degree or higher degree from an institution approved by the commission. (b) A fifth year, or its equivalent, of college or university education. (c) Such specialized and professional preparation as the commission may require. The services credential with a specialization in clinical or rehabilitative services authorizes the holder to perform, at all grade levels, the service approved by the commission as designated on the credential. Clinical or rehabilitative services which may be designated by the commission include, but need not be limited to, speech, language, and hearing services.

For more than thirty years, OTs and PTs have provided invaluable support in both general education and special education to enable children's readiness to learn, confidently participate in academic curricula and better access physical and social activities on campus. OTs and PTs contribute to Multi-Tiered Systems of Support (MTSS) teams by identifying adaptations and modifications, functional use of assistive technology and specialized equipment for the classroom, lunchroom, playground and campus to improve students' capacity to learn and participate in school.

Keck Graduate Institute requests that you take decisive, timely action to establish a Clinical or Rehabilitative Service Credential for occupational therapists and physical therapists. Allowing OTs and PTs to be credentialed will support children and families by allowing these professionals to advance within the educational system. KGI's aim to train highly qualified innovators and scholars of practice ready for a distinguished career fits with elevating the recognition and value of school-based occupational therapists through credentialing occupational therapists in educational settings.



Please contact me at Christy_Billock@kgi.edu if you have any questions.
Kind regards,

A handwritten signature in black ink that reads "Christy Billock". The signature is fluid and cursive, with the first name and last name clearly distinguishable.

Christy Billock, PhD, OTR/L, DipACLM
Professor and Founding Program Director
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