MONTANA
ADMINISTRATIVE
REGISTER

BOARD OF PHYSICAL, REHABILITATIVE, AND DEVELOPMENTAL HEALTH CARE PROFESSIONALS
DEPARTMENT OF LABOR AND INDUSTRY

NOTICE OF ADOPTION

MAR NOTICE NO. 2026-148.2

Summary

Establishing rules for the Board of Physical, Rehabilitative, and Developmental Health Care Professionals

Previous Notice(s) and Hearing Information

On May 8, 2026, the Board of Physical, Rehabilitative, and Developmental Health Care Professionals (agency) published MAR Notice No. 2026-148.1 regarding the public hearing on the proposed changes to the agency's rules, in the 2026 Montana Administrative Register, Issue No. 9.

On June 1, 2026, a public hearing was held on the proposed changes to the rules via the videoconference and telephonic platform. Comments were received by the comment deadline.

Final Rulemaking Action – Effective July 25, 2026

ADOPT AS PROPOSED

The agency has adopted the following rules as proposed:

NEW RULE 1 (24.119.101) ORGANIZATIONAL RULE

NEW RULE 2 (24.119.201) PROCEDURAL RULES

NEW RULE 3 (24.119.202) PUBLIC PARTICIPATION

NEW RULE 5 (24.119.402) FEE ABATEMENT

NEW RULE 6 (24.119.403) ADMINISTRATIVE SUSPENSION

NEW RULE 7 (24.119.405) NONROUTINE APPLICATIONS

NEW RULE 8 (24.119.406) APPLICANTS WITH CRIMINAL CONVICTIONS

NEW RULE 9 (24.119.410) SUBSTANTIAL EQUIVALENCY

NEW RULE 10 (24.119.801) OCCUPATIONAL THERAPIST PROVISIONAL LICENSE

ADOPT WITH CHANGES

The agency has adopted the following rules with changes from the original proposal, stricken matter interlined, new matter underlined:

NEW RULE 4 (24.119.401) FEES

(1) Fees for athletic trainers are:

(a) original application: $175;

(b) renewal: $75.

(2) Fees for occupational therapists and assistants are:

(a) original application: $190;

(b) renewal: $110;

(c) provisional license: $120;

(d) inactive status:

(i) conversion to active status: $60;

(ii) renewal: $50.

(3) Fees for physical therapists and assistants are:

(a) original application and provisional license: $100;

(b) renewal: $60.

(4) Fees for speech-language pathologists and audiologists are:

(a) speech-language pathologist, audiologist, and dual license:

(i) original application: $150;

(ii) renewal: $80;

(iii) conversion between active and inactive: $40;

(iv) speech-language pathologist limited license: $25;

(b) speech-language pathology or audiology assistant:

(i) original application: $50;

(ii) renewal: $25;

(iii) conversion between active and inactive: $20.

Authorizing statute(s): 37-1-131, 37-78-201, MCA

Implementing statute(s): 37-1-134, 37-1-141, 37-15-307, MCA

NEW RULE 11 (24.119.2101) CONTINUING EDUCATION

(1) Licensees are required to obtain continuing education annually, as follows:

(a) athletic trainers: ~~50 hours, but the board recognizes maintenance of~~ continuing education required to maintain current certification by the Board of Certification for the Athletic Trainer ~~as fulfilling this requirement~~;

(b) audiologists: 10 hours;

(c) occupational therapists and assistants: 10 hours, but the board recognizes maintenance of current National Board for Certification in Occupational Therapy as fulfilling this requirement;

(d) physical therapists and assistants: 8 hours;

(e) speech-language pathologists: 10 hours;

(f) speech-language pathology or audiology assistants: 5 hours; and

(g) dual licensed speech-language pathologists and audiologists: 15 hours.

(2) Licensees are responsible for selecting quality programs that focus on protecting the health, safety, and welfare of the public ~~and~~ or that contribute to licensees' professional knowledge and competence. Acceptable activities:

(a) directly relate to the licensee's scope of practice as defined in board statute or rule;

(b) review existing concepts and techniques;

(c) convey information beyond the basic professional education;

(d) update knowledge of the practice and advances in the profession; or

(e) reinforce professional conduct or ethical obligations of the licensee.

(3) Licensees must maintain continuing education documentation and produce it upon request.

(4) Continuing education requirements do not apply until after the licensee's first renewal. A licensee may request from the department exemption from continuing education requirements due to undue hardship.

(5) The department is authorized to audit continuing education requirements and shall determine the percentage to audit based on a statistically relevant sampling of the total number of licensees and the compliance rate of past audits.

Authorizing statute(s): 37-1-131, 37-78-201, MCA

Implementing statute(s): 37-1-306, MCA

NEW RULE 12 (24.119.2301) UNPROFESSIONAL CONDUCT

(1) The following is unprofessional conduct:

(a) regarding patient records, failure to:

(i) appropriately secure records;

(ii) appropriately document patient care; or

(iii) transfer records to another health care provider, the patient, or the patient's representative when requested to do so by the patient or the patient's legally designated representative;

(b) failure to supervise, appropriately direct, or train individuals under the licensee's supervision according to applicable law, rule, or standards;

(c) failure to refer a patient to another professional when warranted;

(d) discontinuing professional services unless services have been completed, the client requests the discontinuation, alternative or replacement services are arranged, or the client is given reasonable opportunity to arrange alternative or replacement services;

(e) exerting undue influence over a client, resulting in client harm, or maintaining a relationship with a client or engaging in or soliciting sexual relations with a client when such relationship, act, or solicitation is likely to impair the licensee's professional judgment or result in client harm;

(f) charging clearly excessive fees; and

(g) promoting or involvement in gambling of any kind on the outcome of an athlete's or team's participation in an athletic competition or event where the licensee has personal knowledge of the athletes or team obtained through professional interaction or provision of services.

Authorizing statute(s): 37-1-131, 37-1-319, 37-78-201, MCA

Implementing statute(s): 37-1-131, 37-1-316, 37-1-319, MCA

TRANSFER AND AMEND AS PROPOSED

The agency has transferred and amended the following rules as proposed:

24.165.407 (24.119.803) EXAMINATIONS

24.165.507 (24.119.807) STANDARDS OF PRACTICE

24.165.509 (24.119.809) APPROVED MODALITY INSTRUCTION

24.165.510 (24.119.810) APPROVED TRAINING

24.165.514 (24.119.814) ENDORSEMENT TO APPLY TOPICAL MEDICATIONS

24.165.516 (24.119.816) USE OF TOPICAL MEDICATIONS

24.165.517 (24.119.817) PROTOCOLS FOR USE OF TOPICAL MEDICATIONS

24.165.518 (24.119.818) DEBRIDING AGENTS PROTOCOLS

24.165.519 (24.119.819) ANESTHETIC AGENTS PROTOCOLS

24.165.520 (24.119.820) NONSTEROIDAL ANTI-INFLAMMATORY AGENTS PROTOCOLS

24.165.521 (24.119.821) ANTISPASMODIC AGENTS PROTOCOLS

24.165.522 (24.119.822) ADRENOCORTICO-STEROID AGENTS PROTOCOLS

24.165.523 (24.119.823) BACTERICIDAL AGENTS PROTOCOLS

24.165.524 (24.119.824) PROTOCOL FOR USE OF AN APPROVED MEDICATION AS A NEUROPATHIC PAIN AGENT

24.177.405 (24.119.1001) PHYSICAL THERAPY AIDES, LICENSE EXEMPTION, AND SUPERVISION

24.177.413 (24.119.1013) DRY NEEDLING

24.177.414 (24.119.1014) FEDERAL MOTOR CARRIER SAFETY ADMINISTRATION PHYSICAL EXAMINATIONS

24.177.701 (24.119.1031) USE OF TOPICAL MEDICATIONS

24.177.704 (24.119.1034) TOPICAL MEDICATION PROTOCOLS

24.177.707 (24.119.1037) APPLICATION AND ADMINISTRATION OF TOPICAL MEDICATION

24.222.410 (24.119.1210) CHANGE OF SUPERVISOR

24.222.415 (24.119.420) INACTIVE LICENSE -- CONVERSION TO ACTIVE

24.222.509 (24.119.1229) SUPERVISED PROFESSIONAL EXPERIENCE

24.222.540 (24.119.1235) SPEECH-LANGUAGE PATHOLOGIST AND AUDIOLOGIST LICENSURE – INITIAL APPLICANTS

24.222.550 (24.119.1240) ASSISTANT LICENSURE – INITIAL APPLICANTS

TRANSFER AND AMEND WITH CHANGES

The agency has amended and transferred the following rules with the following changes from the original proposal, stricken matter interlined, new matter underlined:

24.165.501 (24.119.805) SUPERVISION

(1) Supervisors shall determine the required level of supervision based on the supervisee's clinical experience, responsibilities, and competence.

(2) Occupational therapists do not require supervision except for direct supervision of proctored treatments.

(3) Except per 37-24-105(2) and 37-24-106(2), MCA, ~~certified~~ licensed occupational therapy assistants must work under the general supervision of an occupational therapist.

(4) Provisional license holders must work under the routine supervision of a ~~certified~~ licensed occupational therapy assistant or an occupational therapist.

(5) Occupational therapy aides must work under the direct supervision of an occupational therapist or an occupational therapy assistant.

Authorizing statute(s): 37-1-131, 37-1-319, 37-78-201, MCA

Implementing statute(s): 37-1-144, 37-24-103, 37-24-106, 37-24-107, MCA

24.165.506 (24.119.806) RECOGNIZED EDUCATIONAL PROGRAMS

(1) For licensure as an occupational therapist, the board recognizes those educational programs approved or recognized either by the American Occupational Therapy Association or the ~~American Society of Hand Therapists~~ Accreditation Council for Occupational Therapy Education (ACOTE).

Authorizing statute(s): 37-78-201, MCA

Implementing statute(s): 37-24-303, MCA

24.177.501 (24.119.1021) APPLICATIONS FOR PHYSICAL THERAPY LICENSURE BY EXAMINATION

(1) Applicants for physical therapy and physical therapy assistant licensure by examination shall file with the board an application which shall include the following:

(a) application fee; and

(b) for applicants trained in the United States, a copy of the applicant's certificate of graduation or transcripts demonstrating graduation from a board-approved physical therapy school or physical therapist assistant curriculum; or

(c) for applicants not trained in the United States:

(i) demonstration of compliance with educational standards equivalent to the national standards of the Commission on Accreditation of Physical Therapy Education of the American Physical Therapy Association by using an evaluation of educational background performed by the Foreign Credentialing Commission on Physical Therapy, Inc. (FCCPT); and

(ii) if from a non-English speaking culture, the applicant shall display competency in the English language by passing the national examination test of English as foreign language (TOEFL) with a passing

score as designated by the Federation of State Boards on Physical Therapy (FSBPT); and

(d) verification of all current, previous, and expired licenses in any licensed profession from other states.

(2) Applicants applying for licensure from another state who have not been actively engaged in the profession of physical therapy or physical therapist assistant in the four years immediately preceding application may be required to undergo remedial study in the field of physical therapy subject to the discretion of the board. Remedial study may include, but will not be limited to:

(a) supervised internships;

(b) independent study;

(c) refresher courses;

(d) pertinent graduate or undergraduate course work;

(e) pertinent continuing education courses; and

(f) specialized study in a specific area.

(3) The board recognizes the national physical therapy exam (NPTE) and the national physical therapist assistant examination (NPTAE) for licensure for their respective occupations.

(a) The earliest date on which an applicant for examination may take the examination is the examination date nearest to and before the applicant's expected graduation date.

(b) Applicants must achieve a scaled score of 600 or higher to pass the examination.

(4) Physical therapist and physical therapist assistant applicants for licensure may be issued a provisional license. The provisional license shall identify the licensed physical therapist(s) who shall be responsible for providing direct supervision. The provisional license is valid until the applicant passes the examination and is granted a license. Only one provisional license will be issued per applicant. If the applicant fails the examination, the applicant may sit for the next scheduled examination. The provisional license will not be extended while the applicant is waiting to retake the examination.

Authorizing statute(s): 37-1-131, 37-78-201, MCA

Implementing statute(s): 37-1-131, 37-1-304, 37-11-303, 37-11-304, MCA

24.222.508 (24.119.1228) LIMITED LICENSES

(1) A limited license permits an individual to complete a supervised professional experience as described in ARM 24.119.1229 in order to meet requirements for licensure as a speech-language pathologist.

(2) Applicants for limited licensure must submit a completed application on forms provided by the department, electronically or by paper. Completed applications include appropriate fees and required documentation.

(3) Applicants for limited licensure must:

(a) have a minimum of a master's degree in speech-language pathology or communication disorders from a program accredited by the Council on Academic Accreditation in Audiology and Speech-Language Pathology of American Speech-Language Hearing Association or its equivalent. The transcript must be certified and sent directly from the school;

(b) during the graduate degree program, have completed a supervised clinical practicum experience;

(c) pass ~~examinations as determined by the board~~ the national praxis examination in speech-language pathology or its equivalent; and

(d) have a professional experience supervisor as defined in these rules.

(4) Limited licenses expire two years from the date issued and are not renewable. If a limited license expires and the supervised professional experience is not completed, the person must reapply for another limited license.

Authorizing statute(s): 37-1-131, 37-15-301, 37-15-303, 37-15-307, 37-78-201, MCA

Implementing statute(s): 37-1-131, 37-15-301, 37-15-303, MCA

REPEAL

The agency has repealed the following rules as proposed:

24.118.101 BOARD ORGANIZATION

24.118.201 PROCEDURAL RULES

24.118.202 PUBLIC PARTICIPATION

24.118.301 DEFINITIONS

24.118.402 FEE SCHEDULE

24.118.403 FEE ABATEMENT

24.118.502 NONROUTINE APPLICATIONS

24.118.503 APPLICANTS WITH CRIMINAL CONVICTIONS

24.118.509 MILITARY TRAINING OR EXPERIENCE

24.118.2103 CONTINUING EDUCATION

24.118.2301 UNPROFESSIONAL CONDUCT

24.165.101 BOARD ORGANIZATION

24.165.201 PROCEDURAL RULES

24.165.202 PUBLIC PARTICIPATION

24.165.302 DEFINITIONS

24.165.401 FEES

24.165.402 ABATEMENT OF RENEWAL FEES

24.165.406 MILITARY TRAINING OR EXPERIENCE

24.165.413 NONROUTINE APPLICATIONS

24.165.414 APPLICANTS WITH CRIMINAL CONVICTIONS

24.165.601 TEMPORARY PRACTICE PERMIT

24.165.604 INACTIVE STATUS

24.165.2101 CONTINUING EDUCATION

24.165.2102 CONTINUING EDUCATION – EXEMPTION

24.165.2301 UNPROFESSIONAL CONDUCT

24.177.101 BOARD ORGANIZATION

24.177.201 PROCEDURAL RULES

24.177.202 PUBLIC PARTICIPATION

24.177.401 FEES

24.177.502 EXAMINATIONS

24.177.504 TEMPORARY PERMIT

24.177.510 FOREIGN-TRAINED PHYSICAL THERAPIST APPLICANTS

24.177.512 NONROUTINE APPLICATIONS

24.177.513 APPLICANTS WITH CRIMINAL CONVICTIONS

24.177.2105 CONTINUING EDUCATION

24.177.2301 UNPROFESSIONAL CONDUCT

24.222.101 BOARD ORGANIZATION

24.222.201 PROCEDURAL RULES

24.222.202 PUBLIC PARTICIPATION

24.222.401 FEES

24.222.402 FEE ABATEMENT

24.222.405 NONROUTINE APPLICATIONS

24.222.407 APPLICANTS WITH CRIMINAL CONVICTIONS

24.222.420 ADMINISTRATIVE SUSPENSION

24.222.425 SUBSTANTIAL EQUIVALENCY

24.222.543 SPEECH-LANGUAGE PATHOLOGIST AND AUDIOLOGIST LICENSURE – OUT-OF-STATE APPLICANTS

24.222.553 ASSISTANT LICENSURE – OUT-OF-STATE APPLICANTS

24.222.904 TELEHEALTH SERVICES

24.222.2120 CONTINUING EDUCATION

24.222.2305 UNPROFESSIONAL CONDUCT

Statement of Reasons

The agency has considered the comments and testimony received. A summary of the comments received, and the agency's responses are as follows:

Comment 1: One commenter requested confirmation that a physical therapist or physical therapy assistant practicing in Montana under a compact privilege is considered to be "licensed pursuant to statute" for purposes of performing dry needling.

Response 1: The board appreciates the comment and clarifies that the proposed rule is not intended to exclude physical therapists or physical therapist assistants who are lawfully authorized to practice in Montana under a compact privilege, provided they otherwise meet all applicable Montana requirements for performing dry needling, including any education, training, documentation, and other conditions imposed by Montana law and rule.

Comment 2: One commenter asked the board to confirm that failure to directly supervise a physical therapy aide remains actionable under the proposed unprofessional-conduct rule and/or 37-1-316, MCA. The commenter expressed concern that removing the existing specific disciplinary language from the physical therapy aide rule could create ambiguity or give the appearance that the board has relaxed aide-supervision expectations.

Response 2: The board appreciates the comment and clarifies that the proposed reorganization and consolidation of disciplinary standards is not intended to eliminate, reduce, or relax the enforceability of physical therapy aide-supervision requirements; a licensee's failure to supervise individuals under the licensee's supervision in accordance with applicable law, rule, and professional standards remains actionable under the board's unprofessional-conduct rule and applicable statutory authority, including 37-1-316, MCA, where applicable.

Comment 3: One commenter raised a concern with proposed ARM 24.119.1021(4), which states that the provisional license shall identify the licensed physical therapist responsible for providing direct supervision. The commenter reads the singular phrasing as potentially allowing only one named supervising physical therapist per provisional licensee, which could create practical problems when the named supervisor is absent for vacation, illness, continuing education, family leave, jury duty, or other ordinary reasons.

Response 3: The board agrees with the commenter and revises the rule to indicate supervisor(s).

Comment 4: One commenter asks how the department or board will determine whether continuing education is "substantially equivalent" for purposes of converting an inactive license to active status, including whether this means the same number of hours required in Montana and whether the continuing education must meet Montana's continuing-education requirements.

Response 4: The board appreciates the comments and may consider it in a future rulemaking.

Comment 5: One commenter asked what happens when a licensee has been out of practice for fewer than two years.

Response 5: An inactive Montana occupational therapist licensee who has been out of practice for fewer than two years may convert to active status.

Comment 6: One commenter noted that only some license types under the consolidated board appear to have inactive-status provisions and suggests that inactive-fee language should be written consistently for readability.

Response 6: The board appreciates the comment and may consider it in a future rulemaking.

Comment 7: One commenter stated that the proposed assistant-licensure language does not mirror House Bill (HB) 348 (2025). The comment states that the statutory language was designed to ensure that the hours required by rule were completed by July 15, 2025, not merely that an individual served as an unlicensed aide or assistant before that date. The commenter asks the board to make clear that this is no longer an open pathway to assistant licensure because the deadline for completing the required hours has passed and expresses concern that individuals newly working as unlicensed school aides after passage of HB 744 should not have access to this assistant-licensure pathway.

Response 7: The experienced-based pathway for assistant licensure is for individuals who met the statutory deadline and is not an ongoing route for newly hired unlicensed aides to become licensed assistants.

Comment 8: One commenter noted that the proposed limited-license rule and initial-licensure rule use different language to describe the examination requirement. The commenter suggested using "have passed the national Praxis examination" consistently across the applicable rules and characterized this as a consistency issue rather than a major substantive concern.

Response 8: The board appreciates the comment and agrees that consistent terminology improves readability and ease of administration. The board amends ARM 24.119.1228(3)(c) to read "pass the national praxis examination in speech-language pathology or its equivalent."

Comment 9: One commenter suggested adding "or equivalent" after "baccalaureate degree" in the speech-language pathology assistance provisions. The commenter explains that some applicants complete a different baccalaureate degree and then complete post-baccalaureate "leveling" coursework or similar coursework that satisfies prerequisites for admission to graduate-level speech-language pathology or audiology programs.

Response 9: The board thanks the commenter and may consider this in a future rulemaking project.

Comment 10: One commenter states that proposed ARM 24.165.506 references the American Society of Hand Therapists (ASHT) as an entity recognized by the board as approving or

recognizing education programs for occupational therapists. The commenter explains that the accrediting body for occupational therapy education programs is the Accreditation Council for Occupational Therapy Education (ACOTE), and that ASHT does not accredit occupational therapy academic programs.

Response 10: The board agrees with the commenter and changes the wording accordingly.

Comment 11: Several commenters state that several new proposed rules are not inclusive of occupational therapy assistants (OTAs), even though OTAs are regulated by the board. Specifically, the commenters identify NEW RULE 4 (24.119.401) on fees and the proposed rules on continuing education and provisional licenses as mentioning occupational therapists but not OTAs. The comment cites 37-24-103, MCA, defining OTAs as persons licensed to assist in occupational therapy under general OT supervision, and asks that OTAs be included in all relevant sections throughout the rules.

Response 11: The board agrees with the commenters, and further notes that physical therapy assistants are also not included. The board therefore inserts "and assistants" into NEW RULE 4 (24.119.401) (2) and (3), and into NEW RULE 11 (24.119.2101) (1)(c) and (d).

Comment 12: Several commenters object to references to certified occupational therapy assistants in proposed ARM 24.165.501 on supervision. The comment acknowledges that NBCOT certification is required for initial licensure but warns that using "certified" in the supervision rule could confuse licensees into thinking certification is issued by the board or must be maintained to keep an OT or OTA license. The requested change is to remove both occurrences of the word "certified" from the proposed supervision rule.

Response 12: The board agrees and replaces "certified" with "licensed."

Comment 13: Several commenters state that the dry needling rule appears to have been transferred from the physical therapy rules into the combined board rules and refers only to physical therapists. The comment asserts that athletic trainers and occupational therapists who are trained in dry needling are permitted under Montana law to perform the treatment, and that including a dry needling rule that refers only to physical therapists could imply that physical therapists are the only profession of the combined board allowed to perform dry needling. The comment requests that, if a dry needling rule is included in the combined board rules, it includes athletic trainers and occupational therapists rather than being specific to physical therapists.

Response 13: The commenter is correct that the rule was transferred from the physical therapy rules. Occupational therapists and athletic trainers do not currently have rules surrounding the ability to perform dry needling, and the board may consider this in a future rulemaking process.

Comment 14: One commenter notes that the public participation rule appears to have been carried over from the athletic trainer rules as ARM 24.118.202, but that the new board rules are intended to be placed in ARM Title 24, chapter 119. The comment asks whether "118" should

be changed to “119” and whether the final rule number should be updated to fit within the new board rule structure.

Response 14: The board is adopting NEW RULE 3 as the public participation rule and will number it ARM 24.119.202 in the new rule structure.

Comment 15: One commenter observes that the proposed fee rule appears to collect existing fees for the professions being consolidated and does not adjust fee levels. The comment asks whether fees for all professions within the board will be made level later, after the new board is formed.

Response 15: Yes, with the consolidation, the board will review fees in 2027 and adjust if necessary.

Comment 16: One commenter raises concern that proposed ARM 24.119.2101(1)(a) could be read to require athletic trainers to complete 50 hours of continuing education annually or could otherwise conflict with Board of Certification for the Athletic Trainer (BOC) requirements, which are currently measured on a two-year cycle and may change over time. The comment requests that the rule simply refer to the BOC continuing education requirement, consistent with the current athletic trainer rule, rather than stating a specific hour requirement that could become inconsistent with BOC standards.

Response 16: The board agrees with the commenter and amends (1)(a) to read “athletic trainers: continuing education required to maintain current certification by the Board of Certification for the Athletic Trainer.”

Comment 17: Several commenters suggest the board replace the “and” in 24.119.2101(2) with “or” to read “Programs must focus on protecting the health, safety, and welfare of the public and or contribute to licensees’ professional knowledge and competence.”

Response 17: The board agrees with the commenter and makes the suggested change.

Comment 18: One commenter notes an issue with proposed ARM 24.119.2301(1)(g), which identifies as unprofessional conduct promoting or involvement in gambling on the outcome of an athlete’s performance or a team’s participation in an athletic competition or event. The comment asks whether the rule is intended to impose a blanket ban on all sports betting or only to prohibit betting or promotion of betting based on personal knowledge obtained through professional interaction with athletes or teams. The comment also notes a potential loophole if a licensee provides a tip based on personal knowledge to another person who places a bet and suggests limiting the prohibition to situations where the athlete or team member is a current client of the licensee.

Response 18: The board seeks to prohibit betting or promotion of betting passed on personal knowledge obtained through professional interaction with athletes or teams. It therefore amends the rule to read:

“(g) promoting or involvement in gambling of any kind on the outcome of an athlete's or team's participation in an athletic competition or event where the licensee has personal knowledge of the athletes or team obtained through professional interaction or provision of services.”

Comment 19: One commenter suggested using the same terminology to refer to provisional and limited licenses, mirroring the physical therapy provisional license language.

Response 19: The board appreciates the comment. The limited-license provisions for speech-language pathology serve a specific function related to completion of supervised professional experience for licensure as a speech-language pathologist after having passed the examination, while provisional licensure in other professions serves a different function, such as temporary practice while awaiting examination results.

Comment 20: One commenter suggested allowing provisional license holders two attempts to pass required examinations prior to expiration of the provisional license.

Response 20: The board appreciates all comments received, and may consider this as part of a future rulemaking.

Comment 21: One commenter requested removing the 36-week supervision requirement for speech-language pathologists, indicating it is a burden to get insurance credentialing with the limited license.

Response 21: The board strongly disagrees with the commenter and believes the 36-week supervision requirement for speech-language pathologists is necessary to maintain clinical competence.

Comment 22: One commenter expressed support for the rulemaking but attached a letter of appreciation related to a Mississippi bill.

Response 22: The board appreciates all comments received during the rulemaking process.

Contact

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Rule Reviewer

Jennifer Stallkamp

Approval

Sarah Swanson, Commissioner

Approval

Trent Gahl, Chair, Board of Physical, Rehabilitative, and Developmental Health Care Professionals