**April 20, 2020**

**Dee Berline, MBA, C/NDT, OTR/L**

**Chairperson, Board of Directors,**

**National Board for Certification in Occupational Therapy,**

**Executive Office**

**One Bank Street**

**Suite 300**

**Gaithersburg**

**MD 20878**

**Dear Ms. Berline,**

**During these unprecedented times, the safety, health and wellbeing of our community must continue to be our highest priority. The mission of NBCOT to serve the public interest by advancing client care and professional practice must not be compromised and it is important at the outset that you understand that the purpose of this letter is not to undermine that.**

**Unprecedented times call for unprecedented actions and so we are writing to you to advocate for our recent graduates who have been caught in this moment in time and are unable to take their Board Certification and therefore unable to progress into their careers. The evidence indicates that with every passing day our recent graduates ability to pass the board certification examination is being compromised and the anxiety and stress this is causing is of concern. These young people have incurred significant debt to reach the point of graduation and are now caught in a cruel limbo unable to move forward, attempting to study for the most significant examination of their lives but with no certainty as to when they can do that and ultimately unable to seek employment and move forward.**

**With the closure of your testing sites, a bottle-neck has been created that some might say needs a creative solution to address it. The current closure of testing sites until May 1 is an ambitious timeline when many states are looking beyond that to begin to slowly re-open communities and so we would like to respectfully put forward a proposal to you to help and support our graduates and your customers. It is our belief that alternative solutions need to be considered to provide a temporary, interim solution so that this limited group of test candidates can move forward and be successful.**

**One option may in fact be an “old solution” where you might consider returning to allowing testing to occur at university sites. As this is a limited number of graduates we feel that by allowing university’s to host your examination, in the same way that occurred prior to the use of testing sites, we could support the return to limited operations until your testing sites can re-open. As an academic setting we are already set up to provide testing, we could easily adhere to social-distancing guidelines and still effectively proctor your examination at our institutions. While it might not look exactly the same as current testing it could still be a secure and effective testing environment.**

**We are being faced by many challenges in these times as we try to continue to support our students and graduates, while still maintaining the support and confidence of all our stakeholders. Focusing on this “low-hanging fruit” and finding a way forward to allow these young people to take their examination in the next few weeks is our responsibility. Offering an examination, at a place they are familiar with, would in our opinion be a workable and appropriate solution and we hope that you and the Board will consider working with us to explore alternative options to support these new graduates.**

**In addition to the above points, it is the recommendation of this commission that the ACVF be instituted for processing and verification by NBCOT.  Although testing is being withheld, the ACVF approval is used by some states as “proof” and “consideration” for temporary licensure as part of the application process for temporary licensure.  The inability to obtain the ACVF verification through NBCOT is preventing new graduates from requesting temporary licenses and moving forward with employment opportunities.  Students that have proof of intention to test with NBCOT may be able to gain temporary employment while they wait for testing opportunities.**

**Yours respectfully,**

**The American Occupational Therapy Association (AOTA)**

**Commission on Education (COE):**

**Tina DeAngelis, EdD, OTR/L (Chairperson)**

**Celeste A. Alexander, M.S., OTR/L**

**Inti Marazita, M.S., OTR/L**

**André Johnson, BHS, COTA/L**

**Gavin Jenkins, PhD, OTR/L**

**Shannon Levandowski, OTD, MS, OTR**

**Kim Qualls, OTD, MS, OTR/L**

**Marguerite Deforge, OTD, OTR**

**Alexandra N. Keehn, MOT, OTR/L**

**Audrey Wilson-Alston, MBA, COTA/L**

**Wanda Mahoney, PhD, OTR/L**

**Bridgett Piernik-Yoder, PhD, OTR/L**