
From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Request to provide testimony at September 6th regarding proposed changes to Dental Board/Dental Hygiene Committee
Date: Tue Aug 29 2023 13:08:09 CDT
Attachments: Outlook-xj1vsooy.png

I request the opportunity to provide comments at the September 6th meeting of the Boards and Commissions Review Committee.

Name: [REDACTED]
Speaking on behalf of: Iowa Dental Hygienists Association
Purpose of comments: proposed changes to Dental Hygiene Committee to the Dental Board

If you have any questions regarding this, please feel free to contact me at this email address or via phone at [REDACTED].

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Owner:

[REDACTED]

Filename: Outlook-xj1vsooy.png

Last Modified: Tue Aug 29 13:08:09 CDT 2023



From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Iowa Board of Nursing
Date: Tue Aug 29 2023 14:42:53 CDT
Attachments:

As a nurse in Iowa, I want to express my opinion that it is extremely important for the Board of Nursing to maintain oversight and set standards for nursing practice in the state of Iowa. I was troubled by the licensing oversight being moved to the Iowa Department of Inspection and Appeals for both nursing and medicine. These are both boards concerning the health and wellness of the people of Iowa. It is important that persons with expertise in these areas continue to have oversight in these areas. Perhaps a need for reorganization, but the experts in these fields need to continue to maintain their boards.

[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Request to Speak at September 6 Committee Meeting
Date: Tue Aug 29 2023 15:51:08 CDT
Attachments: image558917.png

The Iowa Chapter of American Society of Landscape Architects would like to speak to the Committee regarding the recommendation to consolidate the Landscape Architectural Examining Board with the Architectural Examining Board.

Thank you.

Owner:

[REDACTED]

Filename: image558917.png

Last Modified: Tue Aug 29 15:51:08 CDT 2023

This message may contain confidential information and is intended solely for the use of the addressee. If you are not the intended recipient of this message, please notify the sender and do not disclose, use, disseminate or copy this message. Any personal opinion expressed in this message reflects the opinion of the sender and not Confluence. You have no rights to absolute privacy and confidentiality regarding messages distributed via E-Mail.

Upon Acceptance of any electronic media generated and provided by Confluence, Inc. the recipient covenants and agrees that all such media are instruments of service and belong to Confluence, Inc. The recipient agrees to waive all claims against Confluence, Inc. resulting in any way from any unauthorized changes or reuses of the media. In addition, the recipient agrees, to the fullest extent permitted by law, to indemnify and hold Confluence, Inc. harmless from any damage, liability or cost, including attorney's fees and cost of defense, arising from the use of any such file(s). The media shall not be used for any other project.

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc: [REDACTED]
Bcc:
Subject: Public hearing September 6th
Date: Tue Aug 29 2023 18:00:48 CDT
Attachments:

Hello,

I'd like to comment at the public hearing on September 6th regarding boards and commissions. My comments will focus on the massage therapy board proposed merger. I'm a licensed massage therapist and serve as the Government Relations chair for the American Massage Therapy Association's Iowa Chapter.

Thank you,

[REDACTED]

--

[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc: [REDACTED]
Bcc:
Subject: Re: RELEASE: Gov. Reynolds calls for public input on boards and
commissions, Review Committee to hold public meeting
Date: Wed Aug 30 2023 08:00:00 CDT
Attachments:

Hello!

I would like to request to speak on behalf of the National Association of Social Workers - Iowa Chapter during the September 6th meeting, please.

Thank you,
[REDACTED]

On Tue, Aug 29, 2023 at 2:26PM Press Releases from Iowa Governor's Office
<iowaGovernorsOffice@public.govdelivery.com> wrote:

OFFICE OF THE GOVERNOR

Governor Kim Reynolds★Lt. Governor Adam Gregg

FOR IMMEDIATE RELEASE: Tuesday, August 29, 2023

CONTACT: Kollin Crompton, (515) 745-2840, kollin.crompton@governor.iowa.gov

Gov. Reynolds calls for public input on boards and commissions, Review Committee to hold public meeting

DES MOINES – Together with the Boards and Commissions Review Committee, Governor Reynolds is calling for public input on proposed recommendations to reform Iowa's board and commissions.

The Boards and Commissions Review Committee, created in the Governor's alignment bill, is responsible for reviewing the efficiency and effectiveness of all boards, commissions, and other

similar entities created in Iowa law. Based on the Committee's ongoing review, its members have proposed preliminary recommendations, which can be found online here. The Committee is required to submit a report containing its final findings and recommendations to the Governor and the general assembly no later than September 30, 2023.

"Iowans should submit their feedback on the committee's preliminary recommendations, helping this committee put together a well-rounded final proposal. Reviewing Iowa's 256 Boards and Commissions is long overdue, and Iowans now have the chance to weigh in on how their taxpayer dollars should be used to support them," said Gov. Kim Reynolds.

Members of the public and interested stakeholders can submit comments on the Committee's preliminary recommendations by sending an email to BCRCcomments@iowa.gov.

The Boards and Commissions Review Committee will also hold a meeting in Room 103 of the State Capitol (Old Supreme Court Chamber) on Wednesday, September 6, 2023, at 12:00 p.m. for further public input on recommendations to be made by the Committee.

If members of the public are interested in addressing the committee at its September 6th meeting, please email BCRCcomments@iowa.gov and request to speak. Please include your name and if you are representing an organization.

###

Stay Connected with the Office of the Governor of Iowa:

[Manage Subscriptions](#) | [Help](#)

[REDACTED]

█

█ regards,



From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Medical Boards and Oversight
Date: Wed Aug 30 2023 08:31:49 CDT
Attachments: image001.gif

The Boards encompassing any medical licensing, certification and oversight are too important and detail-oriented to be combined with other unrelated cohorts (for example – placing DIA functions with medical licensing is too broad). Important details can and will be missed. Public safety is paramount. Please reconsider this portion of the organization plan and keep nursing (medical) licensing and oversight as one entity.

Respectfully,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Owner:

[REDACTED]

Filename: image001.gif

Last Modified: Wed Aug 30 08:31:49 CDT 2023



From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Review process
Date: Wed Aug 30 2023 08:47:45 CDT
Attachments:

I currently serve on the Board of Athletic Training and am preparing some comments for a future email. I have a question before I prepare those comments though:

What was the criteria used to determine if a board should be eliminated, merged, consolidated, left alone, etc.? Could you please share the reasons the Board of Athletic Training was recommended for elimination.

Thank you.

[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Comments on preliminary recommendations...
Date: Wed Aug 30 2023 09:26:18 CDT
Attachments:

To the Boards and Commissions Review Committee:

I am writing regarding the recommendation on page 3, that the Board of Psychology be consolidated/merged. While I am not clear from the document with which boards that consolidation would be considered, I would draw to awareness that there are significant differences amongst the various mental health and healthcare professions that vary from the practice of psychology.

For example, psychologists are the only doctoral-level healthcare providers with training and expertise in both psychotherapy and psychological testing/assessment. Having a combined board would water-down the understanding of some key clinical practice areas that are foundational to our profession as psychologists. That is, how could a licensed marriage and family therapist truly understand psychological testing, for example.

Also, while there is a great deal in common, there do exist meaningful differences amongst the various codes of ethics for the different professions that would make consensus decisions about violations nigh impossible!

Finally, consolidating the Board of Psychology with any other allied mental health profession board, the board of medicine, or any other healthcare board would only further erode the public's understanding of the distinct roles and expertise of those professions. That could lead to financial waste (e.g., a Medicaid recipient seeks an evaluation for psychological testing with a psychiatrist who cannot provide the service, costing the State money for an unwarranted service), and could reduce the protections the public currently enjoys.

In conclusion, I applaud the consideration of efforts to reform and streamline the various commissions and boards; however, it is vital that a superficial understanding of the similarities amongst them not be the deciding factor. There are meaningful differences between and amongst the various boards that should not be under-valued or understated. To do so could endanger the public, have unintended costs, and hamper the vital functions of boards such as the Board of Psychology.

Thank you for your attention to this message, and the important matter to which it pertains!

Sincerely,

--

[REDACTED]

[REDACTED]

CONFIDENTIALITY NOTICE: This email is covered by the Electronic Communications Privacy Act, 18 USC/2510-2521, is confidential, and may be legally privileged. If you are not the intended recipient, you are hereby notified that any retention, dissemination, distribution, or copying of this communication is strictly prohibited by law. Please reply to the sender that you have received this message in error, then delete it.

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Public Input on Recommendations-Boards and Commissions Review
Date: Wed Aug 30 2023 11:26:40 CDT
Attachments:

Hello,

My name is [REDACTED] and I am a member of the Iowa Midwives Association. I am requesting to be able to speak to the committee at the September 6th, 2023 meeting regarding the committee's recommendation to eliminate the Midwifery Advisory Council.

Please let me know if you need any additional information from me, and if I will be permitted to speak at this meeting.

Thank you!

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc: [REDACTED]
Subject: Comment to BCRC
[REDACTED]

Dear members of the BCRC,

I appreciate your work and do not envy your task. In looking at the list, I was surprised to discover there were so many Board & Commissions in the state of Iowa. I'm thankful Gov. Reynolds is addressing this issue and will support whatever the final recommendation is.

I am currently the chair of the Board of Nursing Home Administrators. This is my fourth year serving on the Board and my second year as the chair. Our work has been challenging through COVID, but I feel we do a good job of providing accountability to nursing home administrators. I would hope that the work we do is carried over to another board or commission, if that is the final recommendation, as the Board is slated to be eliminated. Personally, I feel the board should be maintained. Holding nursing home administrators to a high standard and quality of care is essential to protecting the vulnerable population of an aging community. We receive several complaints a month, some are non-issues, but some address serious health and safety issues and offer a level of accountability and protection for the public.

Again, I do not envy your work but felt it necessary to provide my perspective.

[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc: [REDACTED]
Bcc:
Subject: Wednesday September 6th meeting
Date: Wed Aug 30 2023 12:11:32 CDT
Attachments:

As President of the Iowa Hearing Association I would like to speak on our behalf regarding deregulation of licensing for our profession.

I understand this meeting is at noon in room 103 of the State Capitol.

Thank you,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

“Dream Big, Make Plans, Smash Goals!”

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc: Petersen, Janet [LEGIS]
<janet.petersen@legis.iowa.gov>; austin.baeth@legis.iowa.gov
<austin.baeth@legis.iowa.gov>
Bcc:
Subject: Iowa Boards Consolidation
Date: Wed Aug 30 2023 12:58:04 CDT
Attachments:

State of Iowa

I am writing to provide comments regarding the Boards & Commissions Review Committee proposals. As currently written, it is recommended to abolish the Board of Psychology and the Board of Social Work, and to combine them with the Board of Behavioral Health. I am strongly opposed to that move. First, the Board of Behavioral Health, and the other mental health boards, typically oversee master's level clinicians, rather than doctoral level clinicians. I am concerned about their ability to understand the nuances here. Moreover, the public is in need of more protection, rather than less. I have made several reports to boards about other clinicians who have caused harm by practicing outside the scope of their practice. Those boards have done nothing to stop those professionals from encroaching on duties limited to psychologists, as well as violating test publication copyright, and I have witnessed direct harm as a result. Collapsing boards is likely to result in less oversight, and I feel it would be irresponsible to do so.

I am not sure that I am qualified to comment on boards that do not involve mental health, but this aspect of the proposal is errant in its thinking and understanding. Again, I am registering as strongly opposed to the proposed change. I would also oppose the elimination of all minority/marginalized population boards (into the expanded Human Rights Commission). I suspect that would give each a less powerful and focused voice.

Thanks.

[REDACTED]

[REDACTED]

NOTE: Email is not a secure form of communication; thus, confidentiality cannot be ensured. If a confidential document is being sent to you, it is password protected. If you do not know the password, please contact the sender. If you received this e-mail message in error, please immediately notify the sender.

ATTENTION: This electronic document may contain confidential information and is intended for use only by the addressee or their representative. This email, including attachments, is covered by the Electronic Communications Privacy Act, 18 USC Sections 2510 – 2521, as well as by the Health Insurance Portability & Accountability Act (HIPAA). This information is solely for the intended recipients. If you are not the intended recipient, you are hereby notified that any review, use, dissemination, distribution, copying, or storing of this email or any attachments is prohibited. If you have received this electronic transmission in error, please notify the sender immediately and delete the message. Thank you for your cooperation.

Thank you.

From: [REDACTED]
To: BCRCComments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: BOARDS & COMMISSIONS REVIEW COMMITTEE - SUBCOMMITTEE
RECOMMENDATIONS - AUGUST 29, 2023
Date: Wed Aug 30 2023 13:06:26 CDT
Attachments:

Dear Boards & Commissions Review Committee,

My Public Comment:

I am writing to you as an athletic trainer and Iowa Athletic Training licensee. I have reviewed some of the preliminary recommendations made by your committee. A recommendation that caught my attention was the recommendation to ELIMINATE the board of athletic training. My initial concern upon review is regarding protection of the public. Iowa Athletic Trainers are medical professionals that work with both minors and/or adults. As medical professionals we sometimes must perform medical actions that may or may not be extremely sensitive to the patient. My concern is that if this board is eliminated, the public is at risk of wrongdoing with no governing body to discipline/investigate the action. This is especially damaging if the wrongdoing effects a minor. Just like every medical profession, nearly all professionals within are great at their jobs, compassionate, and sensitive to the patients concerns. My concern is, who will monitor and protect against the few bad apples who are not great at their jobs, compassionate, and sensitive to the patients concerns? Who will ensure that children harmed by the one bad apple cannot be harmed again, or harm others? This goes beyond just children, all of the public who is cared for by an athletic trainer could be at risk if this recommendation was implemented as is.

I understand this is a decluttering and cost reduction mission. This mission should not endanger the public at that expense, in my opinion. In terms of taxpayer cost reduction, the board of athletic training requires a licensing fee which fully or mostly supports board activities. As a result, the tax burden is negligible or none.

I hope this message finds you well and provides additional context for your decision making. Lastly, if their one key takeaway from this message that can emphasize, it is this: Athletic Training is not a form of "fitness training", athletic training is a medical profession who cares for

both children and adults. From hospitals to the football field, when your child is injured, an athletic trainer could be the one providing care.

A reply is not necessary, but should you feel the need I am happy to help in any way I can.

****I do not speak on behalf of any organization, group, or employer. The comments above are mine and mine alone.****

Thank you for your consideration of my comments,



From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: request to speak
Date: Wed Aug 30 2023 14:00:51 CDT
Attachments:

My name is [REDACTED] and I am currently the President-Elect of the Iowa Athletic Trainers Society and a Professor/Director of Athletic Training at Drake University. I am asking to speak on behalf of athletic trainers at the meeting to be held on September 6 regarding the changes to boards in this state, and in particular the elimination of the Board of Athletic Training.

Thanks,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Re: proposed elimination of Dietetics Board
Date: Wed Aug 30 2023 14:29:36 CDT
Attachments:

I have been a registered and licensed Dietitian since 2017, working as a clinical RD part-time for the Knoxville Hospital and Clinics, along with providing evidence-based nutrition guidance in my private practice.

The Dietetics Board ensures that Iowans are able to identify and access qualified professionals who demonstrate the knowledge, skill and competency necessary to provide safe and ethical nutrition therapy. As the public increasingly understands the importance of good nutrition, some individuals without any formal education, training or expertise in human nutrition or dietetics are exploiting this newly recognized market. The most prevalent job task that I do for Iowans is correct nutrition misinformation & nutrition supplement quackery, and counsel them on evidence-based dietary guidelines.

In addition to helping the public identify and access qualified practitioners, licensure often provides health insurance companies and state and federal governments with the assurance that these practitioners meet standards of professional competence in order to be reimbursed for providing nutrition care services. In Iowa, medical nutrition therapy and therapeutic diets are provided by licensed and registered dietitians, and it is in Iowa law that these services MUST be provided...by licensed and registered dietitians for insurance payment. This comes into play at the hospital/clinic levels, as well as long-term care facilities.

I have 2 requests:

- 1) Either leave the Dietetics Board as is; or, merge it with other licensed and registered healthcare professions, such as Nursing, Physicals, Social Workers, Respiratory Therapists, Nursing Home/Rehab facilities, Physical Therapists, Radiologists, Dental, etc.
- 2) Update the Iowa insurance code to add registered and licensed dietitians as being 'in-network', i.e., 'preferred providers'.

If you have any questions, let me know.

[REDACTED]

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Public Hearing
Date: Wed Aug 30 2023 15:56:04 CDT
Attachments:

Please add a representative from the Iowa Psychological Association to your list of speakers for Wednesday's public hearing on boards/commissions. If one of IPA's board members cannot speak, Amy Campbell (lobbyist) will read their comments. I am sorry that I don't have a name yet - we are trying to find out if anyone is free at that time as mental health appointments are booked out for some time. Subject is the elimination of the Board of Psychology and moving psychologist licensure under the board of behavioral health.

Thanks.

Amy Campbell | Partner, The Advocacy Cooperative | Partner, Campbell/Patterson Consulting LLP | PO Box 1403 | Johnston, Iowa 50131 | amy@ialobby.com | 515.554.5838 (cell) | www.ialobby.com

Representing AARP Iowa, Hills & Dales, Association of Area Agencies on Aging, Iowa Affiliate of the American College of Certified Nurse-Midwives, Iowa Association of Rural Health Clinics, Iowa Behavioral Health Association, Iowa Chapter of the National Association of Pediatric Nurse Practitioners, Iowa Coalition Against Sexual Assault, Iowa County Conservation System, Iowa Developmental Disabilities Council/Iowans with Disabilities in Action, Iowa Library Association, Iowa Natural Heritage Foundation, Iowa Nurse Practitioners Association, Iowa Nurses Association, Iowa Primary Care Association, Iowa Psychological Association, Iowa Public Transit Association, Iowa State Reserve Law Officers Association, Juvenile Detention Coalition of Iowa, League of Women Voters of Iowa, Link Associates, Loess Hills Alliance, Lutheran Services in Iowa (LSI), Okoboji Tourism, On With Life, Polk County, Prevent Child Abuse Iowa, Professional Developers of Iowa, Rosecrance, SafeNetRx, Systems Unlimited

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Boards and Commissions Comments
Date: Wed Aug 30 2023 15:57:47 CDT
Attachments:

This message was sent securely using Zix®

Please carefully consider which boards and commissions you merge/eliminate. I am a licensed Speech Language Pathologist. The Speech Language Pathology board ensures that it's licensed members are well trained and practicing at the top of their license. Eliminating and merging boards reduces oversight, lessens continuing education, and de-values our practice. A functioning board is the only way to protect citizens from incompetent or impaired practitioners. Combining multiple unrelated career fields will limit a board's efficiency and efficacy.

Sincerely,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

"No matter how much success you are having,
you can't continue working together if you can't communicate."

~Matt Cameron

This message was secured by Zix®.

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Preliminary recommendations on boards and committess
Date: Wed Aug 30 2023 16:00:22 CDT
Attachments: image001.png
image002.png

To whom it may concern,

I want to express my disappointment with the recommendations of the Boards and Commissions Review Committee. As a member of the boiler board and owner of a business where we work on boilers as well as sell boilers, I believe the boilers board is of utmost importance. The board is made up of a diverse group of people from engineers, contractors, inspectors and distributors. Our collective knowledge helps in making the rules that are enforced by inspectors to keep occupants safe throughout the state of Iowa. We also hold others accountable so there is not just one person that has the ultimate say in making rules and decisions that affect the taxpayers of this great state. I wish and hope that the committee will reevaluate their stance and let the Boiler Board continue to aid in keeping occupants safe.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

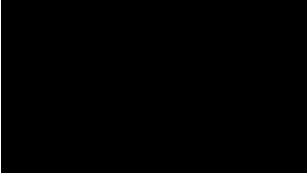
[REDACTED]

Owner:

[REDACTED]

Filename: image001.png

Last Modified: Wed Aug 30 16:00:22 CDT 2023



Owner:

[REDACTED]

Filename: image002.png

Last Modified: Wed Aug 30 16:00:22 CDT 2023



From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Request to appear for public comment
Date: Wed Aug 30 2023 16:29:45 CDT
Attachments: Outlook-fj3robwx.png
Outlook-flfkiny4.png

Dear Committee Members,

As President of the Iowa Athletic Training Society, representing over 1000 Athletic Trainers in the state, I would like to request a time to address the Committee during the period of public comment on September 6th at 12 noon.

Thank you.

[REDACTED]

Iowa State University
1011 South Dakota Avenue
Ames, IA 50011
515-460-5828 (mobile)

Owner:

[REDACTED]

Filename: Outlook-fj3robwx.png

Last Modified: Wed Aug 30 16:29:45 CDT 2023



ATHLETIC TRAINING

Owner:

[REDACTED]

Filename: Outlook-flfkiny4.png

Last Modified: Wed Aug 30 16:29:45 CDT 2023



IATS

**IOWA
ATHLETIC
TRAINERS'
SOCIETY**

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic Training Licensure Board elimination
Date: Wed Aug 30 2023 16:56:50 CDT
Attachments:

Boards and Commissions Review Committee,

I am writing to you today to express my concern with your recommendation to eliminate the Board of Athletic Training and the Licensing of Athletic Trainers in the state of Iowa. The importance of maintaining our regulating bodies in order to insure the protection of the Athletes in our State is paramount. Reducing or eliminating regulation would be a giant step backwards in Athletic Training practice in our state to where literally anyone could serve as the "Athletic Trainer" at their place of employment as that employer saw fit.

Athletic Training is a healthcare profession and we ATs are responsible for the health and wellbeing of a specific population. We have national regulation via a national board exam to initially become credentialed to practice but, as in many other areas for professional organizations, it is the States that are ultimately responsible for the adherence to and maintenance of educational competency via Licensure and Board regulation. We must have a standard of practice and system of ensuring applicants or current licensees are properly educated and trained, or we will be headed to the unregulated randomness as seen in, and only in, the State of California which does not regulate Athletic Training at the State level.

I understand the streamlining and reduction of governmental burden in some areas and that the task of the Boards and Commissions Review is great but reduction for a profession that provides healthcare to the athletes in the state (in many instances the youth) cannot be part of this. Additionally, this proposed reduction will not affect cost-saving measures as the Board of Athletic Training operates without funding from the State as the members are volunteers and they do meet virtually.

Many Athletic Trainers across the state have had lead roles in life saving measures of student athletes or former student athletes. I myself performed CPR on a former student at the school I work for and can say that they survived. I have 2 other athletic trainers who work for me who just last year correctly identified lacerated spleens on football athletes during games and had them transported immediately to hospitals again, likely saving their lives.

I ask that you maintain our Licensure and Board as is, without modification. Perhaps a middle ground can be met if you disagree, and would be willing to be a part of that discussion. Thank you for your time and consideration on this extremely important issue.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Comments regarding the proposed elimination of the Board of Athletic Training
Date: Wed Aug 30 2023 17:06:36 CDT
Attachments:

My name is [REDACTED], and I am a resident of Ankeny, a parent of two children who participate in sports, an athletic trainer, a Professor of Athletic Training and the Athletic Training Program Director at Drake University, and the President-Elect of the Iowa Athletic Trainers' Society.

I am reaching out to comment on the proposed changes to committees/boards in our state and particularly the recommended elimination of the Board of Athletic Training. I cannot begin to state how alarming this is for the safety of athletes in this state. Athletic trainers play a vital role in the safety of young athletes playing sports in our state daily. The presence of athletic trainers allows coaches to coach and allows a trained healthcare provider to prevent, evaluate, treat, and rehabilitate injuries. Additionally, if an emergency occurs, athletic trainers are present to provide the necessary immediate care and activate an emergency action plan/response. Finally, and more specifically, with concussion care being such an important and vital topic, having trained professionals who can diagnose and treat head injuries accurately and effectively is necessary for safe participation in sports.

There are many stories of the importance of athletic trainers, too many for this one email, but I will share a few. Brent Greenwood, who graduated from Pleasant Valley High School and played football at Iowa, was working out in Bettendorf and collapsed. An athletic trainer's quick and effective response to his cardiac issue is why he is still alive today. Last year, athletic trainers at two different high schools in Iowa accurately diagnosed internal organ damage and saved their athlete's lives. Athletic trainers at a university in Iowa saved the life of a basketball manager during practice a few years ago and saved an athlete from paralysis last year by properly treating a cervical spine injury. I could go on and on with more stories. In each case you needed a trained professional there, on site, to have a positive outcome. Having to call medical help or having someone without the right qualifications present could have led to a poor outcome. Athletic trainers are the professionals that are trained to be on site and take care of these injuries.

If the licensing system for athletic trainers was removed, it would be up to the schools who are hiring athletic trainers determine the viability of an individual to be an athletic trainer. That

[REDACTED]

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Changing the AT law
Date: Wed Aug 30 2023 18:22:42 CDT
Attachments:

Hi my name is [REDACTED],
I am a 2nd year grad student part of the MSAT program at the University of Iowa. I have recently learned of the possible law to go into effect about our licensure's within the state of Iowa. I would like to stress to you the importance of keeping the current law the way it is as it effects our profession with crossing state lines and allowing people who haven't gone to school for it apply for a state license.

Please consider NOT removing the panel for Athletic Training!

Thank you

Get Outlook for iOS

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic Training Importance
Date: Wed Aug 30 2023 18:27:56 CDT
Attachments:

Good evening,

I am a graduate student at the university of Iowa studying to be an Athletic Trainer. I just am concerned about the possibility of Iowa becoming a state that removes the licensure of athletic training leading to anyone having the ability to call themselves athletic trainers. It is a crucial profession that is necessary in the state of Iowa. It would be extremely detrimental to both athletes and athletic trainers if licensure was removed due to this legislation. I really hope that this will not happen and athletic trainers will continue to have their licensure in the state of Iowa.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Licensure
Date: Wed Aug 30 2023 18:35:21 CDT
Attachments:

To whom it may concern,
Taking away licensures in the state of Iowa for Athletic Trainers would be detrimental to the active population and those who come in contact with ATs. Here is some following information about ATs that back up needing a license to practice. This is important to me because as a Student in my Masters program for AT this can greatly affect where I can work and would like to work.

* Athletic trainers are health care professionals who specialize in the prevention, diagnosis and intervention of emergent, acute and chronic medical conditions involving impairment, functional limitations and disabilities. We as students must go through an intense 2-year master's program that includes classes such as emergency care, orthopedics, advanced anatomy, etc. On top of that we need complete so many hours of clinical experience and patient encounters under an ATC.

* Athletic trainers provide medical services to all types of patients. Across the United States, in addition to practicing in traditional sports team settings, athletic trainers work in performing arts, public safety, occupational health, and with the armed forces.

* Licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.

* Eliminating licensure in IA could potentially impact an AT's ability to practice across state lines (travel with their team), depending on regulatory requirements in other states. (ex. some states allow you to practice in their state temporarily, provided your home state maintains the same regulatory requirements)

Please reconsider the elimination of AT licensure in the state of Iowa. It is very important for

both of us as AT students, ATC, and the active community.

Thank you,


Get Outlook for iOS

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: AT Licensure
Date: Wed Aug 30 2023 20:09:21 CDT
Attachments:

Good evening,

I am reaching out as an outraged athletic trainer at the thought of the state of Iowa eliminating the Athletic Training Licensure Board. I am a BOC certified and Licensed Athletic Trainer providing quality care to three different High Schools in Northwest Iowa. Without a proper licensure process for my profession you are endangering athletes by allowing less qualified individuals to determine their care. I underwent rigorous training in terms of education and clinical requirements during my two years obtaining my masters degree. This training and continuing education allows me to feel comfortable making quick and important healthcare decisions with the youth athletes I provide care to. Without a licensing board individuals will be able to put themselves in positions to make these decisions for young athletes that could potentially alter the rest of their lives.

Without a licensing board in the state of Iowa other professions will be given freedom to set our scope of practice. Our scope of practice allows me to provide the care I was trained extensively for. Allowing other professions to determine what I can and cannot do in providing my healthcare would undermine the integrity of my position. I am asking you to really consider just how big of an impact this would make upon a group of professionals that want to continue to provide high quality healthcare across the state of Iowa, as well as, protect the integrity of the profession.

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Immediate Action Needed: Board of Athletic Training and Licensure
Date: Wed Aug 30 2023 20:39:39 CDT
Attachments:

To whom it may concern, I implore you to read this message in its entirety.

Hello, My name is [REDACTED] and I am a second-year graduate student at the University of Iowa in the Master of Science in Athletic Training (MSAT). The impact that the Athletic Training profession has had on my life as a previous youth and collegiate athlete is unparalleled. I hope to provide the same standard of care one day to my own patients as I have received throughout my life.

I am originally from Nashville, Tennessee and made the decision to move to Iowa because of the University's exceptional curriculum for the MSAT program as well as the clinical experiences we are afforded the opportunity to participate and learn in. Athletic training is a young profession based upon extensive research and evidence, which is reflected in the education required to be admitted into a master's program, complete all classroom coursework while fulfilling our clinical obligations, as well as be approved for and sit for our Board of Certification (BOC) exam. In order to receive your certification, you must pass your board exam, like nursing and physical therapy. However, unlike both of those professions, we are often first on the scene of an injury. We are the ones who see and work with our patients daily. We are the ones who develop a rapport and trust with the patients we see in order to progress them from an injury to the return to activity. Athletic trainers are professionals who are able to provide care in emergency situations, able to provide pain relief through therapeutic modalities such as electrical stimulation and various manual therapies, we design and progress rehabilitation programs along with programming prevention programs to decrease injury risk before they even happen. Athletic trainers are confidants and educators that promote physical and mental health.

By eliminating the process of licensure, individuals without any proper training or education will be enabled to legally claim they are a healthcare professional and therefore put athletes and other active individuals across the state at risk. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS) and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession. Athletic trainers are essential to the success and operation of the healthcare team.

Iowa is a state that I now call home and pray that I can call home for many years to come. However, if the Board of Athletic Training is eliminated, along with the requirement to apply for licensure, my future and the future of every athletic trainer within the state is at risk. At the

University of Iowa, Iowa State University, Drake University, Coe College, the University of Dubuque, etc., there are athletic trainers who provide healthcare to elite athletes every single day. In the University of Iowa hospitals, Mercy Hospitals and Iowa Orthopedics in Des Moines there are athletic trainers who serve adults and children in clinics every day. In the wonderful towns of Pella, Carlisle, and Spirit Lake, there are athletic trainers who serve high school students as healthcare providers that are able to provide care when a hospital may be too far away in the instance of an emergency and are able to provide rehabilitation programs without the crippling costs of physical therapy. At corporations with factory workers such as Quaker Oats in Cedar Rapids, there are athletic trainers who are available to treat patients and keep them working at their peak performance so that they can continue to provide for themselves and their families.

I humbly urge you to support the Iowa Board of Athletic Training and require licensure for regulation of practice throughout the state. Do not allow any individual without the proper education, clinical experience and true knowledge of the responsibility of our profession to abuse it. Protect the public and protect the current licensed, life changing practitioners of athletic training in the state of Iowa.

Sincerely,

[Redacted]

[Redacted]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Board of Athletic Training Elimination
Date: Wed Aug 30 2023 21:26:11 CDT
Attachments:

Members of the Boards and Commissions Review Committee,

My name is [REDACTED] and I am currently in my final year of the graduate Master of Science in Athletic Training program at the University of Iowa. My classmates and I have worked incredibly hard over the past year and a half to receive a master's level of education and the necessary clinical experience hours to sit for the Board of Certification exam required to call ourselves Certified Athletic Trainers in the near future. I alone have accumulated over 600 hours of clinical experience in the last year, not counting extra volunteer hours and experiences to learn how to better serve my patients. I look forward to obtaining a job in the secondary school setting after graduation to provide the best patient care I can provide. However, I cannot provide the quality of care that all athletes deserve without the level of education and clinical experiences I have and would be putting these children at risk if I were to call myself a healthcare professional without the proper education, certification, and licensure.

Athletic trainers are health care professionals that specialize in the prevention, diagnosis, and intervention of emergent, acute and chronic medical conditions involving impairment, functional limitations and disabilities. Along with already having a Bachelor of Health Science degree, I also have taken courses in rehabilitation techniques, orthopedic evaluation, nutrition, psychology, pharmacology, and a general medicine course. Again, I would be putting my patients and athletes, including youth athletes, at risk of harm if I tried to do this job without the proper education and hands-on training. Athletic trainers provide medical services to all types of patients, not just athletes. Across the United States, we practice with traditional sports team settings, performing arts companies, public safety, occupational health, and tactical athletes such as the armed forces.

As of now, 47 states and the District of Columbia require licensure for athletic trainers. Of the 3 remaining states, New York has a licensure bill that is waiting for the Governor's signature, California has pending legislation, and Hawaii. Licensure provides the highest level of patient protection for the safety of the public and is the standard regulation for health care professions. Athletic trainers are defined as allied health professionals by the United States Department of Health and Human Services, and are assigned a National Provider Identifier number. The American Medical Association also recognizes athletic training as an allied health profession. If licensure in Iowa is eliminated, this could impact an athletic trainer's ability to practice across state lines, which means that any collegiate or professional team with an athletic trainer would have to travel without their primary health care provider. Some states allow you to practice in their state temporarily, for example traveling with a team, but your home state has to maintain the same regulatory requirements as the state you are traveling to.

I urge you to consider how this change might impact the families and children you serve. Having a licensed and certified athletic trainer on the sideline of a Friday night football game can be the difference between life and death for these athletes in their most dire situation. However, an untrained individual in the same situation would cause more harm than good due to their lack of education and experience. We are the first on the scene, and the only health care provider to follow an athlete from the point of injury to the point of return. We see them before the EMTs, before the physician, before the physical therapist, and advocate for them every step of the way. We are essential to the success of the healthcare team and the wellbeing of active people across the country, and the state of Iowa.

Sincerely,

A solid black rectangular box used to redact the signature of the sender.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Objection to merging different professionals into a single behavioral health board
Date: Wed Aug 30 2023 21:57:57 CDT
Attachments:

I object to the proposal to merge the Board of Psychology with Social Work, Mental Health Counseling, and Marriage & Family Therapy. A merged board would be extremely difficult for board members to be knowledgeable about the different laws and ethical codes. It would be much less efficient than the current structures. Ultimately, it would not benefit the citizens of Iowa who use our services.

Please consider maintaining psychology as it's own board, similar to nursing and medicine.

[REDACTED]

[REDACTED]

Note: Email should not be considered a secure means of communication. Confidentiality cannot be assured. This email message, including any attachments, is for the sole use of the intended recipient(s). Any unauthorized review, use, disclosure or distribution is prohibited. In the event of an emergency after regular business hours, please call the National Suicide Prevention Lifeline at 988, Emergency Services at 911, or go to a hospital emergency department. Also note that email is not checked 24 hours per day and is not appropriate for emergency situations.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Public comment on Board of Athletic Training Elimination
Date: Thu Aug 31 2023 07:59:38 CDT
Attachments: Outlook-b2xrqtb2.png
Outlook-u11mebin.png

Dear Committee:

It has come to my attention that the recommendations from the Department of Inspections, Appeals and Licensure, more specifically the Committee of Boards and Commission Review recommends to eliminate Board of Athletic Training as well as the State Licensure of Athletic Training.

As the current President of the Iowa Athletic Training Society, representing over 1000 Athletic Trainers in our state, I cannot stress the importance of maintaining our regulating bodies in order to insure the protection of the Athletes in our State. Reducing or eliminating regulation will lead to the reversion of Athletic Training practice in our state to the previous climate of Athletic Training where literally anyone could serve as the "Athletic Trainer" at their place of employment as that employer saw fit.

Athletic Training is a healthcare profession and we ATs are responsible for the health and wellbeing of a specific population. One must obtain an advanced degree from an Accredited Institution with very specific coursework and hundreds of hours of clinical training in order to become eligible for Board testing at a National level. We have national regulation via this national board exam to initially become credentialed to practice but, as you know in many other areas for professional organizations, it is the States that are ultimately responsible for the adherence to and maintenance of educational competency via Licensure and Board regulation. We must have a standard of practice and system of vetting applicants or current licensees, or we will be headed to the unregulated randomness as seen in, and only in, the State of California which does not regulate Athletic Training at the State level.

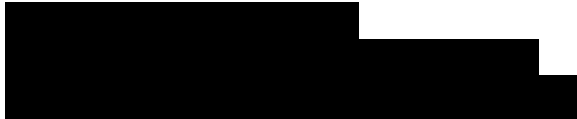
I fully understand the streamlining and reduction of governmental burden in some areas and that the task of the Boards and Commissions Review is great but reduction for a profession that provides healthcare to the athletes in the state (in many instances the youth) cannot be part of this. Additionally, this proposed reduction will not affect cost-saving measures as the Board of Athletic Training operates without funding from the State as the members are volunteers and they do meet virtually.

I beg for you to reconsider the potential to eliminate the regulation of Athletic Training and maintain our Licensure and Board as is, without modification. Perhaps a middle ground can be

met if you disagree, but I would welcome further discussion on this matter and would be more than open to discussing it with the Committee.

Please feel free to contact me for further discussion as any assistance I could provide on our behalf to the Committee would be beneficial to those I represent as well as the athletes at all levels in the State of Iowa.

Sincerely,

A large black rectangular redaction box covering the signature area.

Iowa State University
1011 South Dakota Avenue
Ames, IA 50011
515-460-5828 (mobile)

Owner:

[REDACTED]

Filename: Outlook-b2xrqt2.png

Last Modified: Thu Aug 31 07:59:38 CDT 2023



IATS

**IOWA
ATHLETIC
TRAINERS'
SOCIETY**

Owner:

[REDACTED]

Filename: Outlook-u11mebin.png

Last Modified: Thu Aug 31 07:59:38 CDT 2023



STATE

ATHLETIC TRAINING

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic Training Licensure
Date: Thu Aug 31 2023 08:45:20 CDT
Attachments:

Good morning,
My name is [REDACTED], and I am an Athletic Training Student at the University of Iowa. After hearing the proposal of eliminating the licensure of Athletic Training in the state of Iowa, I am shocked. Athletic trainers are health care professionals who specialize in the prevention, diagnosis and intervention of emergent, acute and chronic medical conditions involving impairment, functional limitations and disabilities. With this being said, it takes a lot of knowledge, dedication, and hard work in order to be an athletic trainer. This is not a position that can be fulfilled by someone without the proper training. In order to continue to provide the best healthcare possible to athletes and patients in the state of Iowa, I strongly recommend keeping the athletic training licensure. Again, this is a position that requires a lot of knowledge and dedication, and letting individuals without the proper training practice as an athletic trainer is, not only a step back for our profession, but also not providing adequate healthcare to individuals who need it.

[REDACTED]

From:

[REDACTED]

To:

bcrccomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

[REDACTED]

Subject:

Elimination of Board of Athletic Training and Licensure
[REDACTED]

Good morning,

My name is [REDACTED], and I am a second-year Master of Science in Athletic Training student at The University of Iowa. Eliminating the board and licensure for athletic training would be a mistake. Athletic training is a recognized profession by the American Medical Association that provides specialized care in prevention, diagnosis, and emergency care in addition to the rehabilitation aspect. Athletic training is unique in that we are with patients from the time of injury through the entire process of healing. Removing licensure is a step backward for the athletic training profession, which provides care in a variety of settings. Athletic trainers not only provide care for athletics but also provide care in industrial, clinical, and hospital settings. Licensure stipulates the highest possible level of patient protection for the public's safety as it creates a standard of care governing athletic trainers. Removing licensure places the public at risk of receiving below-quality care from non-licensed individuals.

I plead with you to make the right decision for the protection of your people.

Thank you for your time,

[REDACTED]

From: [REDACTED]
[REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic Training licensure in Iowa
Date: Thu Aug 31 2023 09:03:12 CDT
Attachments: image001.png

Dear Boards and Commissions Review Committee,

My name is [REDACTED], and I am an athletic trainer and a Clinical Associate Professor in the Master of Science in Athletic Training Program at the University of Iowa. I am reaching out to comment on the proposed changes to committees/boards in our state and particularly the changes to the Board of Athletic Training and athletic training licensure.

Athletic trainers are health care professionals who specialize in the prevention, diagnosis and intervention of emergent, acute and chronic medical conditions involving impairment, functional limitations and disabilities. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.

Athletic trainers play a vital role in the safety of young athletes playing sports in our state daily. The presence of athletic trainers allows coaches to coach and allows a licensed health care provider to prevent, evaluate, treat, and rehabilitate injuries. Additionally, if an emergency occurs, athletic trainers are present to provide the necessary immediate care and activate an emergency action plan/response. Finally, and more specifically, with concussion care being such an important and vital topic, having trained professionals who can diagnose and treat head injuries accurately and effectively is necessary for safe participation in sports.

I have been an athletic trainer for 29 years and worked in a variety of settings – clinic, high school, and college. Over the years, we have worked hard to attain licensure for athletic trainers in most states in the country, the final few are working towards licensure now. Across the US, 49/50 states have some form of regulation of the profession athletic training. The one remaining state has an active bill which would require regulation of the practice of athletic training. Licensure is imperative for all health care providers, including athletic trainers. Licensure provides the highest level of patient protection for the public's safety, and it the

standard form of regulation for health care professions. In addition, licensure also requires athletic trainers to obtain continuing education over the years, which is necessary for public protection as best practices naturally evolve over an athletic trainer's career. The patients of Iowa deserve to be treated by licensed health care professionals and removing athletic training licensure puts this at risk. Removing licensure can also impact an athletic trainer's ability to practice across state lines when they travel with their athletic teams. All of this would move health care backwards, which is not a good thing.

I urge you to keep athletic training licensure and the Board of Athletic Training to ensure the public's safety.

Thank you for your consideration and taking the time to read this email.

Sincerely,

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Owner:

[REDACTED]

Filename: image001.png

Last Modified: Thu Aug 31 09:03:12 CDT 2023

THE 
UNIVERSITY
OF IOWA

Master of Science in Athletic Training

Tradition, Excellence,
In Page 70 of 1221

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: You CANNOT Eliminate the Iowa Athletic Training Board!
Date: Thu Aug 31 2023 09:06:48 CDT
Attachments:

Iowa Boards and Commissions Review Committee,

The decision you are considering to eliminate the Iowa Athletic Training Board and to eliminate the athletic training license is a major step in the wrong direction. Throughout the years athletic trainers have been pushing to be in more schools and to get the recognition they deserve. The largest population of athletic trainers are part of the secondary school community. Not only do they provide athletic training services to the athletics at the school but they are mentors for the students. They assist in more than just the sports med but they can be so influential in the lives of these children who are our future. Don't we want to think of these kids too? Don't the future of these kids matter? If we eliminate the Board and Licensure, this takes away the protection that many athletic trainers desire in their position. It not only is the backbone to the profession but it allows athletic trainers to continue to grow and expand as they have been! Please reconsider this action as I believe it will influence more than just the athletic training profession, it will greatly influence everyone in the sports medicine world as well as athletics.

Thank you.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: proposed consolidation of Board of Psychology
Date: Thu Aug 31 2023 09:56:06 CDT
Attachments:

Dear Committee Members,

As a licensed psychologist, I am very concerned about the proposal to consolidate the Board of Psychology in with boards for other professions that also provide psychological counseling. Although psychologists certainly do provide counseling, they also provide a number of other services that are outside the scope of practice for other professions, most notably psychological assessment. Psychological assessment is required to access a range of state-funded and community services (for example, in order for a citizen of Iowa to qualify for an Home and Community Based services Intellectual Disability (ID) waiver, they must have a diagnosis of Intellectual Disability from a psychologist or psychiatrist, which requires psychological testing (<https://hhs.iowa.gov/sites/default/files/Comm511.pdf>). If the psychological assessment is not provided by a qualified and competent psychologist and the diagnosis is not given, a child might not qualify for the ID waiver. Psychological testing is also required to establish a diagnosis of Autism Spectrum Disorder, a diagnosis with significant implications that is eligible for substantial support, and wrong diagnosis has real harms for citizens and families in Iowa. Iowans coping with children with special needs should not be burdened with having to determine on their own if a psychologist is competent. They should be able to trust that the state's licensing and regulatory board is ensuring licensed practitioners are competent. If all the behavioral science boards are combined, presumably there would be just 1-2 psychologists on the board, given that there are many fewer psychologists than social workers or marriage and family therapists. The social workers and marriage and family therapists on the board have no training or expertise in assessment and would not be able to effectively evaluate citizen complaints. It would be akin to allowing Nurse Practitioners to dominate the board that regulates physicians, despite having a more limited scope of practice than physicians do. I request that you do not consolidate the Board of Psychology with other boards, as it would harm the welfare of Iowans, particularly those with vulnerable families.

Respectfully,

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic training Advisory Board
Date: Thu Aug 31 2023 10:00:04 CDT
Attachments:

To whom it may concern,

I am an Iowa resident and am writing to you today to express my concern for the proposed elimination of the Board of Athletic Training and Iowa Athletic Training licensure in the state of Iowa. I am opposed to this change.

Eliminating licensure in IA could potentially impact an AT's ability to practice across state lines (travel with their team), depending on regulatory requirements in other states. What if the athletic trainers at the public Universities in Iowa could no longer travel and practice healthcare across state lines with their respective teams?

In the U.S., 47 states and the District of Columbia require licensure for athletic trainers. Of the 3 remaining non-licensure states, New York has a licensure bill awaiting the Governor's signature and California has pending legislation. Athletic trainers are healthcare professionals who specialize in the prevention, diagnosis, and intervention of emergent, acute, and chronic medical conditions involving impairment, functional limitations, and disabilities. Athletic trainers provide medical services to all types of patients. Across the United States, in addition to practicing in traditional sports team settings, athletic trainers work in performing arts, public safety, occupational health, and with the armed forces.

Licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for healthcare professionals. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied healthcare profession.

Thank you,

[REDACTED]

--



From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Iowa Athletic Training Board and AT Licensure
Date: Thu Aug 31 2023 10:03:46 CDT
Attachments:

My name is [REDACTED] and I am a long time resident of Iowa City, and an athletic trainer with over 45 years of experience. I have practiced in Iowa at the high school, college, and clinical settings. After retiring from the collegiate setting, I still am employed part time as an athletic trainer at the University of Iowa in their Sports Medicine Clinic. Additionally, I served for several years as a member of the governor-appointed Iowa AT Board here in Iowa. I know the importance of this governing committee here in our state!

I am reaching out to comment on the proposed changes to committees/boards in our state and particularly the recommended elimination of the Board of Athletic Training. I cannot begin to state how alarming this is for the safety of athletes in this state. Athletic trainers play a vital role in the safety of young athletes playing sports in our state daily. The presence of athletic trainers allows coaches to coach and allows a licensed healthcare provider to prevent, evaluate, treat, and rehabilitate injuries. Additionally, if an emergency occurs, athletic trainers are present to provide the necessary immediate care and activate an emergency action plan/response. Finally, and more specifically, with concussion care being such an important and vital topic, having trained professionals who can diagnose and treat head injuries accurately and effectively is necessary for safe participation in sports.

There are many stories of the importance of athletic trainers, too many for this one email, but I will share a few. [REDACTED] who graduated from Pleasant Valley High School and played football at Iowa, was working out in Bettendorf and collapsed. An athletic trainer's quick and effective response to his cardiac issue is why he is still alive today. Last year, athletic trainers at two different high schools in Iowa accurately diagnosed internal organ damage and saved their athlete's lives. Athletic trainers at a university in Iowa saved the life of a basketball manager during practice a few years ago and saved an athlete from paralysis last year by properly treating a cervical spine injury. I could go on and on with more stories. In each case you needed a licensed healthcare professional there, on site, to have a positive outcome. Having to call medical help or having someone without the right qualifications present could have led to a poor outcome. Athletic trainers are the professionals that are trained to be on site and take care of these injuries.

If the licensing system for athletic trainers was removed, it would be up to the schools who are hiring athletic trainers to determine the viability of an individual to be an athletic trainer. That means the schools and often athletic administrators or coaches who are not trained in healthcare will be charged with determining who is qualified to provide healthcare. While I have respect for athletic administrators and coaches, they are not the best individuals to hire a healthcare provider. Overall, this change hurts the public and makes participation in sport less safe.

Additionally, by removing the licensure system from our state, we would rely only on the Board of Certification (BOC) exam as a way of assessing the quality of an athletic trainer. While this exam is designed to protect the public by screening recent graduates for basic knowledge and skill, a means for our state to monitor athletic trainers and ensure continuing education is necessary for public protection as best practices will naturally evolve over an athletic trainer's career.

The move to eliminate the Board of Athletic Training is a backward movement in comparison to the rest of the country. Across the US, 49/50 states have some form of regulation of the profession of athletic training. The one remaining state has an active bill which would require regulation of the practice of athletic training. Licensure is required in 47/50 states. Thus, by moving away from licensing athletic trainers in our state, we would be moving in the opposite direction of everyone else and in this case, being different is not a good thing.

Finally, as a grandparent, I want my kids to be safe when playing sports. I know injuries will happen, but I expect the school or organization to have the properly trained individuals on site to provide care. Removing the Board of Athletic Training and licensure system takes away an important and effective means to ensure qualified individuals are providing that care.

Thank you for the consideration of these comments and I ask that you reach out to the committee members making this decision and reconsider the elimination of the Board of Athletic Training.

Thanks so much for reading this email!

Sincerely,



From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic Training Licensure
Date: Thu Aug 31 2023 10:23:11 CDT
Attachments:

Good Morning,

I wanted to reach out and express my concern for the possibility of eliminating the Athletic Trainer Licensure in Iowa. Athletic Trainers are healthcare professionals responsible for the health and safety of a population including our youth population. By reducing or eliminating the licensure requirements it allows anyone to call themselves an AT and provide care to our population without the correct education and training. We go through very specific coursework from accredited programs where we complete not only substantial coursework but also hundreds of clinical hours to prepare us to be Athletic Trainers.

By reducing or eliminating the standard of licensure you are putting athletes at risk.

Thank you for your time, if you have any questions please feel free to contact me.

[REDACTED]

--

[REDACTED]

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Board of Athletic Training
Date: Thu Aug 31 2023 10:24:47 CDT
Attachments: image001.png

To whom it may concern,

My name is [REDACTED] and I am an Iowa Resident and a licensed athletic trainer. I have a Doctorate in Athletic Training and have 20 years of experience working as a certified and licensed athletic trainer in the State of Iowa. I am writing to express my concern and opposition to the proposed elimination of the Board of Athletic Training and elimination of the Licensure of Athletic Trainers (ATs) in the State of Iowa.

- * Currently 47 states and the District of Columbia require licensure for athletic trainers. Of the remaining non-licensure states, New York has a licensure bill awaiting the Governor's signature and California has pending legislation. Hawaii at this time only requires registration.
- * Athletic Trainers are health care professionals who specialize in the prevention, diagnosis and intervention of emergent, acute and chronic medical conditions involving impairment, functional limitations and disabilities.
- * Licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for health care professions. Athletic Trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services, and are assigned NPI numbers. The American Medical Association also recognizes ATs as allied health professionals.
- * Athletic Trainers provide medical services to all types of patients. Across the US, in addition to practicing in traditional sports team settings, ATs work in performing arts, public safety, occupational health, and with the armed forces.
- * The elimination of the Licensure of ATs in the State of Iowa could potentially impact an AT's ability to practice across state lines (travel with their teams), depending on regulatory requirements in other states.
- * The elimination of Licensure of ATs in the State of Iowa could impact the state's ability to recruit and retain high quality, competent and certified ATs to work with patients in the state of Iowa, further limiting healthcare access to Iowa residents.

For the above reasons I strongly oppose the elimination of the Board of Athletic Training and elimination of the Licensure of ATs in the State of Iowa.

Sincerely,

[REDACTED]

[REDACTED]

Northwestern College
101 7th Street SW
Orange City, Iowa 51041

Owner:

[REDACTED]

Filename: image001.png

Last Modified: Thu Aug 31 10:24:47 CDT 2023

image001.png for Printed Item: 49 (Attachment 1 of 1)



StandOut

Page 83 of 1221

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic Training Licensure Board and Licensing
Date: Thu Aug 31 2023 10:30:02 CDT
Attachments: image001.jpg
image002.jpg

I am the Director of Sports Medicine at Iowa State University and reside in Nevada.

I was just made aware there will be a recommendation to eliminate the licensing board for Athletic Training and potentially athletic training licensure.

Athletic trainers are front line health care workers and the setting which they work are now very diverse. They also now require a masters degree in Athletic Training to sit for the national board exams and thus to qualify for Iowa License to practice. Athletic Training has become a specialty sports medicine service with extensive education and preparation. The state of Iowa has multiple master's programs in our university and colleges educating future people in this profession. It's growth, and subsequent expansion of services across our state has been due to the requirement and assurance of qualified individuals rendering care, just like any other medical profession.

The growth of this profession and the availability of services to athletes and people at all levels has occurred due to the professional demands required to practice. This has occurred because we have ensured competency for the public as to their qualifications by requiring a license just like physicians, physical therapists, radiologists, etc. As you well know, licensure is in place, particularly for health related professions, and to protect the public. Licensure in Iowa has been in place for over 25 years, and has been very successful. There are over 1,100 practicing athletic trainers in Iowa. They work in all settings from schools to universities to pro sports, to private clinics, industry, and corporations. They do so with the assurance of qualifications provided by proving they are licensed. There are few complaints filed to the licensing board, mostly because AT's are professionally prepared and aware of the requirements demanded of being license. It has done it's job to promote professional care. Removing the Board because there are few complaints is akin to removing fire departments because the number of fires are down.

If licensure is eliminated, virtually anyone can claim to be a qualified health care professional athletic trainer, with NO assurance to the public who they are getting. I can personally attest to this, because prior to licensure, we had school janitors, local fitness enthusiasts, and high school/college drop outs serving as the “athletic trainer” for schools and organizations. Every state except California currently requires licensure. California still can’t get this right with no licensure, and they have more reported problems of inappropriate care, services, etc. than anyone in the country, and athletes and students are suffering the consequences.

I was one of the original writers of the state law and the rules and regulations of the board and have been a former Board chair. I can assure you, if licensure is repealed, it will not be long where the public risk will significantly increase when it comes to on-site sports medicine coverage by athletic trainers and the state and many of its entities (namely schools and universities) will have far bigger problems to deal with.

I am being told the Department of Inspections, Appeals, and Licensure is going to recommend discontinuance. I can’t fathom that they would recommend discontinuance of any health related licensing, particularly one where it many times involves youth and young adults. This can’t really be a cost cutting measure since the licensing board meets virtually and requires no dedicated staff to run it and in the end, actually generates revenue to exceed any costs for the state through licensing fees. Should this go through, the impact will surely be felt swiftly and publicly. It would be an epic failure of our state government to not provide protection of the public in this specific area.

Obviously I’m passionate about this, so if you need to call me, let me know.

Please consider all of this. It is an unnecessary action without financial or logical merit with far reaching consequences.

Sincerely,

[Redacted signature]

[Redacted address]

Follow me on Twitter: 

CONFIDENTIALITY NOTICE: This E-mail (included in the attachments) is covered by the electronic Communications Privacy Act, 18 U.S.C. §§ 2510-2521, is confidential and may be legally privileged. If you are not the intended recipient, you are hereby notified that any retention, dissemination, distribution, or copying of this communication is strictly prohibited. Please reply to the sender that you have received the message in error, and then delete it. Thank You.

Owner:

[REDACTED]

Filename: image001.jpg

Last Modified: Thu Aug 31 10:30:02 CDT 2023

image001.jpg for Printed Item
(Attachment 1 of 2)

Page 88 of 1221

Owner:

[REDACTED]

Filename: image002.jpg

Last Modified: Thu Aug 31 10:30:02 CDT 2023



From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Opposition to the elimination of the Board of AT
Date: Thu Aug 31 2023 10:39:58 CDT
Attachments: AT Licensure Map.pdf
image001.png

Boards and Commissions Review Committee:

My name is [REDACTED] and I have been an Athletic Trainer for 24 years. I am also the Program Director for the Master of Science in Athletic Training Program at the University of Iowa. I cannot begin to state how disappointed and frustrated I am with the proposal to eliminate the Board of Athletic Training and the Licensure of Athletic Trainers in the State of Iowa.

1. Athletic Trainers are allied healthcare professionals who now have to earn a Master's degree to obtain certification. We work with patients and athletes daily to prevent, evaluate, treat, and rehabilitate injuries and other conditions. We also are present to provide the necessary immediate care and activate an emergency action plan/response. Finally, we hold a vital role in the care of concussions; having trained professionals who can diagnose and treat head injuries accurately and effectively is necessary for safe participation in sports. I'm sure you know the Damar Hamlin story from this Spring, which put the spotlight on how vital the profession of Athletic Training is and how vital it is to have an educated/trained professional on the sideline.

2. Licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for healthcare professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.

3. Every state and Washington D.C require licensure for ATs. California is the only state who currently has NO regulation but has pending legislation. I hope Iowa does not want to move BACKWARDS in regulation of healthcare professionals, do we?

4. The Board of Athletic Training is NOT an expense to the state of Iowa. Our fees pay/cover all our costs.

5. Finally, as parents, I assume you want your kids to be safe when playing sports. Injuries will happen but don't you expect the school or organization to have the properly trained and licensed individuals on-site to provide care?. Removing the Board of Athletic Training and licensure takes away an important and effective means to ensure quality educated individuals are providing care.

Overall, this change hurts the public and makes participation in sport less safe.

Thank you for the consideration of these comments and I ask that you reconsider the elimination of the Board of Athletic Training.

Thank you for your time,

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Instagram: @uiowa_at

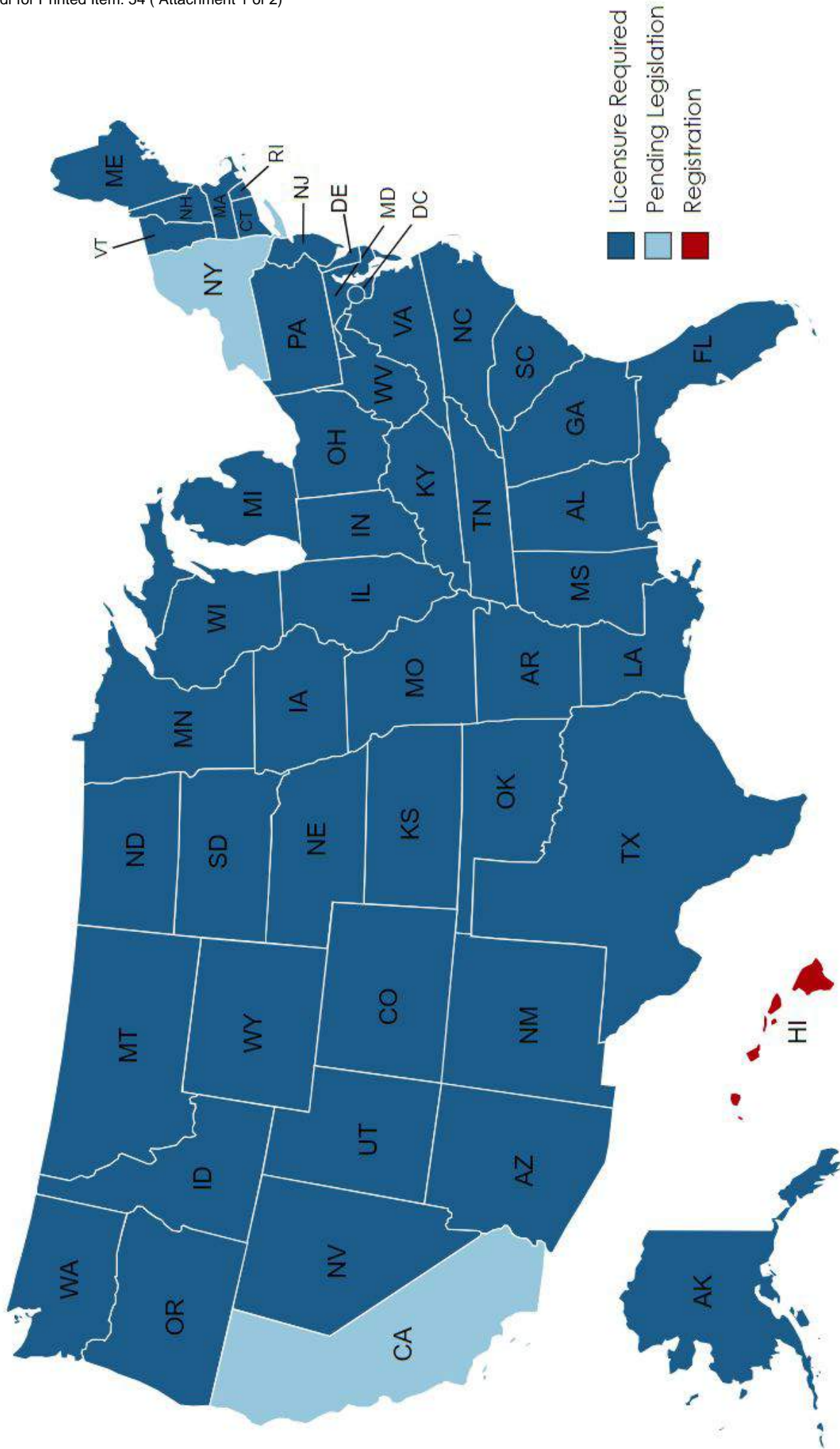
<http://medicine.uiowa.edu/lowaMSAT>

Owner:

[REDACTED]

Filename: AT Licensure Map.pdf

Last Modified: Thu Aug 31 10:39:58 CDT 2023



Owner:

[REDACTED]

Filename: image001.png

Last Modified: Thu Aug 31 10:39:58 CDT 2023

THE
UNIVERSITY
OF IOWA



**Master of Science in
Athletic Training**

*Tradition, Excellence,
Innovation*

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic Training U Iowa
Date: Thu Aug 31 2023 10:42:21 CDT
Attachments:

Dear Committee Members,

I am writing to you today as a Sports Medicine Orthopedic Surgeon and Medical Director of the Athletic Training Program at the University of Iowa. I am writing to express my strong support for the continued licensure of athletic trainers in Iowa.

Athletic trainers are healthcare professionals who specialize in the prevention, diagnosis, and intervention of emergent, acute, and chronic medical conditions involving impairment, functional limitations, and disabilities. They provide a wide range of services, including:

- * Emergency medical care
- * Rehabilitation
- * Injury prevention
- * Wellness promotion
- * Performance enhancement

Licensure provides the highest level of patient protection for the public's safety. It ensures that athletic trainers have the knowledge, skills, and abilities necessary to practice safely and effectively. Licensure also establishes standards of practice and ethics, and it provides a mechanism for investigating and disciplining athletic trainers who violate those standards.

Currently, 47 states and the District of Columbia require licensure for athletic trainers. Iowa is one of the three remaining states that do not have licensure requirements. However, I believe that Iowa should join the majority of states and adopt licensure for athletic trainers.

There are several reasons why licensure is important for athletic trainers in Iowa. First, it would protect the public by ensuring that only qualified individuals are practicing athletic training. Second, it would promote the quality of care provided by athletic trainers by requiring them to meet certain educational and experience standards. Third, it would help to ensure that athletic trainers are held accountable for their actions by establishing a mechanism for investigating and disciplining violations of the practice act.

I am also concerned that eliminating licensure in Iowa could potentially impact an AT's ability to practice across state lines (travel with their team), depending on regulatory requirements in other states. For example, some states allow you to practice in their state temporarily, provided your home state maintains the same regulatory requirements. If Iowa were to eliminate licensure, it could make it more difficult for athletic trainers to travel with their teams to other

states.

In conclusion, I urge you to support the continued licensure of athletic trainers in Iowa. Licensure is essential to protect the public, promote the quality of care, and ensure that athletic trainers are held accountable for their actions.

Thank you for your time and consideration.

Sincerely,

A solid black rectangular redaction box covering the signature area.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Oppose Elimination of Board of Athletic Training
Date: Thu Aug 31 2023 10:58:34 CDT
Attachments: image001.jpg
image002.png

Boards and Commissions Review Committee,

I am writing to ask that you oppose the elimination of the Board of Athletic Training!

I am an Athletic Trainer as well as an educator and parent. The safety of our athletes in the state of Iowa would be at great risk if the Board of Athletic Training was eliminated. Athletic trainers play a vital role in the safety of young athletes playing sports in our state daily. The presence of athletic trainers allows coaches to coach and allows an athletic trainer as a licensed healthcare provider to prevent, evaluate, treat, and rehabilitate injuries. Additionally, if an emergency occurs, athletic trainers are present to provide the necessary immediate care and activate an emergency action plan/response. Finally, with heat illness, cardiac arrest, and concussion being on the minds of many this Fall and all year round, having an athletic trainer who can diagnose and treat these conditions accurately and efficiently is essential.

There are stories right here in Iowa of life saving efforts by an athletic trainer. [REDACTED] [REDACTED] who graduated from Pleasant Valley High School and played football at Iowa, was working out in Bettendorf and collapsed. An athletic trainer's quick and effective response to his cardiac issue is why he is still alive today. Last year, athletic trainers at two different high schools in Iowa accurately diagnosed internal organ damage and saved their athlete's lives. Athletic trainers at a university in Iowa saved the life of a basketball manager during practice a few years ago and saved an athlete from paralysis last year by properly treating a cervical spine injury.

We also worked very hard to protect our professional title and practice so that we can continue to protect the health and safety of our patients. Please help make our profession stronger, not diminish it.

Sincerely,

[REDACTED]

Owner:

[REDACTED]

Filename: image001.jpg

Last Modified: Thu Aug 31 10:58:34 CDT 2023

THE
UNIVERSITY
OF IOWA



Master of Science in Athletic Training

*Tradition, Excellence,
Innovation*

Owner:

[REDACTED]

Filename: image002.png

Last Modified: Thu Aug 31 10:58:34 CDT 2023



IOWA **ATHLETIC TRAINERS' SOCIETY**

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic Training in Iowa
Date: Thu Aug 31 2023 11:01:10 CDT
Attachments:

It has come to my attention today that the Iowa Boards and Commissions Review Committee recommendations for reorganizing and eliminating over 140 boards/commission is proposing the elimination of the Iowa Board of Athletic Training as well as elimination of its Licensing. This is a horrible idea that will imperel the citizens of Iowa. Forty-seven states and the District of Columbia require licensure for athletic trainers. Of the 3 remaining non-licensure states, New York has a licensure bill awaiting the Governor's signature and California has pending legislation (CA is the only state that does not regulate the AT profession--they have pending legislation that is currently a certification bill that they hope to have amended to licensure). (Hawaii, the third non-licensure state, only requires registration).

Athletic trainers are healthcare professionals who specialize in the prevention, diagnosis and intervention of emergent, acute and chronic medical conditions involving impairment, functional limitations and disabilities. (you could include your educational requirements here)

Athletic trainers provide medical services to all types of patients. Across the United States, in addition to practicing in traditional sports team settings, athletic trainers work in performing arts, public safety, occupational health, and with the armed forces.

Licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.

Eliminating licensure in IA could potentially impact an AT's ability to practice across state lines (travel with their team), depending on regulatory requirements in other states. (ex. some states allow you to practice in their state temporarily, provided your home state maintains the same regulatory requirements).

You must resend this unthinkable decision. Thank you for your time and attention to this matter.

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: board of athletic trainers
Date: Thu Aug 31 2023 11:02:56 CDT
Attachments:

We absolutely need our athletic trainers in Iowa. They make a huge impact in our school athletics and they are needed for our student's safety. Here are just a few important notes regarding our athletic trainers.

—We currently have 1,129 ATs who are licensed and countless students who rely on licensing.

—That licensure protects the public and lets clients and employers easily know an AT is properly trained, taking continuing education, and monitored.

—The Board helps provide scope of practice guidance and protects the public from untrained persons.

—There is no expense associated with the Board of Athletic Training. The fees that ATs pay to renew their license cover all costs. They are cost-effective and are consistently in the black each year.

—Every state (except California who has pending legislation) and Washington D.C. require licensure for ATs

Athletic trainers are healthcare professionals who specialize in the prevention, diagnosis and intervention of emergent, acute and chronic medical conditions involving impairment, functional limitations and disabilities.

—Athletic trainers provide medical services to all types of patients. Across the United States, in addition to practicing in traditional sports team settings, athletic trainers work in performing arts, public safety, occupational health, and with the armed forces.

—Licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.

—Eliminating licensure in Iowa could potentially impact an AT's ability to practice across state lines (travel with their team), depending on regulatory requirements in other states. (ex. some states allow you to practice in their state temporarily, provided your home state maintains the same regulatory requirements)

This is a step in the wrong direction for our state. Please don't hurt our student athletes with the poor decision of eliminating their board.



Sent from my U.S.Cellular© Smartphone
Get Outlook for Android

From:

To:

bcrccomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Subject:

Re: Chiropractic Board

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Confidentiality Warning: This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager. This message contains confidential information and is intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Chiropractic Licensure Board
Date: Thu Aug 31 2023 11:40:10 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

[REDACTED]

From:

To:

bcrccomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Subject: Chiropractic Licensure Board concerns

Good morning,

I am a licensed chiropractor in West Des Moines. It has been brought to my attention that there is consideration of merging the Chiropractic Licensure Board with physical therapy, occupational therapy, and massage therapy.

Although this may seem intuitive to lay people, my primary concerns are that chiropractors are the only one of that group that are licensed to be primary care physicians and make diagnoses of ailments that patients present with. Additionally, we're the only one of those professions that is permitted to take and interpret x-rays.

Therefore, if disciplinary hearings are performed involving a chiropractor, I fear the non-chiropractors on the board will not have adequate qualifications to make informed judgements. A qualified board is absolutely necessary for the protection of the general public if a provider is accused of endangering their patients.

Additionally, the following reasons are cause of concern for me:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions.
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Please keep the chiropractic board separate from those other therapy-based professions. If you have any questions or desire to discuss this further, you can reach me at the below phone number, or my personal number is [REDACTED]. I appreciate your consideration.

Regards,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Massage Board Consolidation
Date: Thu Aug 31 2023 11:41:34 CDT
Attachments:

I strongly object to consolidating the massage therapy board with any other boards. [REDACTED]

Sent from my iPhone

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Chiropractic Board Reorganization?
Date: Thu Aug 31 2023 11:43:53 CDT
Attachments:

Dear Board and Commission Review Committee,

My name is [REDACTED], I recently relocated to Bettendorf Iowa from Illinois after living and practicing there for 23 years. One of the reasons I chose Iowa is because of how my profession functions on the state legal level, distinct and separate.

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

The information transmitted in this electronic communication is intended only for the person or entity to whom it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of or taking of any action in reliance upon this information by persons or entities other than the intended recipient is prohibited

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: licensure boards
Date: Thu Aug 31 2023 11:45:25 CDT
Attachments: FCB850AF89664018B37E90A8C3BD0611.png

Dear Board and Commission Review Committee,

I am writing to provide my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. Some of my main concerns with the change include:

- * Creating a safety issue by combining and diluting the expertise on the board that will be dealing with different cases.
- * Adding extra burden to volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Yours in health,

[REDACTED]

[REDACTED]

Owner:

[REDACTED]

Filename: FCB850AF89664018B37E90A8C3BD0611.png

Last Modified: Thu Aug 31 11:45:25 CDT 2023



AUDUBON
FAMILY

chiropractic
and acupuncture

From:

[REDACTED]

To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Bcc:

Subject: Opposing the Merge of Iowa Chiropractic Licensure Board

Date: Thu Aug 31 2023 11:46:45 CDT

Attachments:

Dear Board and Commission Review Committee,

I am writing to firmly express my opposition to the proposed merger of the Iowa Chiropractic Licensure Board with any other boards. This consolidation raises critical concerns that directly impact public safety, as outlined below:

* Expertise Dilution: Combining the boards risks diluting the specialized knowledge essential for effective case management, potentially compromising safety standards.

* Burden on Volunteers: The proposed merger could overburden board volunteers, necessitating increased meetings and hearings to address the unique needs of different professions.

* Resource Strain: Our current struggle to initiate timely investigations to safeguard our profession could intensify under this merger, stretching limited resources even further.

I kindly urge your consideration of this comment. I strongly request a reevaluation of the decision to merge the Iowa Chiropractic Licensure Board with other boards. Such a step demands cautious deliberation due to its implications for public safety and professional integrity.

Sincerely,

[REDACTED]

[REDACTED]

CONFIDENTIALITY NOTICE: The information transmitted in this message is intended only for the person(s) or entity to which it is addressed and may contain confidential and/or legally privileged material. Delivery of this information to any person other than the intended recipient

(s) is not intended in any way to waive privilege or confidentiality. Any review, transmission, dissemination or other use of, or taking any action in reliance upon this information by entities other than the intended recipient is prohibited. If you have received this information and you are not a named recipient, please notify me, delete the information from any computer and destroy all copies.

Sender notified by
Mailtrack 08/31/23, 11:44:45 AM

From:

[REDACTED]

To:

BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

[REDACTED]

Subject:

Reorganization/merging of Iowa Boards

Dear Board and Commission Review Committee,

As a current member of the Iowa Chiropractic Licensure Board, I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



From:

To:

bcrccomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Subject:

Iowa Chiro Licensure

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[Redacted Signature]

From: [REDACTED]
[REDACTED]
[REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Concern Regarding Elimination of Board of Athletic Training in Iowa
Date: Thu Aug 31 2023 11:49:51 CDT
Attachments:

It was brought to my attention that yesterday at the second meeting of the Boards and Commissions Review Committee, Mr. Larry Johnson, Director of DIAL, recommended eliminating the Board of Athletic Training.

There are too many concerns that I have to briefly and concisely formulate in an email. I am not one to allow public policy to cause me stress, and this is the first time I have ever reached out to a State Representative (maybe I should be ashamed of that).

In short, the state of athletic training right now is being stressed to the max. The demands are more, the hours are more, the expectations are more. None of these are complaints, it's just the reality and Athletic Trainers as a whole have embraced these, because it shows our NEED is more. We are making a significant difference in the communities we serve. With the recent transition to a Master's Degree to sit for board exams, fewer individuals are pursuing the degree and entering the workforce. Salaries haven't changed because of the higher education degree (which was expected), but demands have because the workforce is now limited and dwindling. Athletic Training is a career field individuals pursue because they are passionate about caring for others. Athletic Trainers are passionate about putting the needs of others before their own, and being a resource for a community to rely on in times of need. The hours are long, the evenings are late, the pay is poor, the sacrifice on the individual and their family is great. I'm afraid removing the Board of Athletic Training and thus ensuring licensure to practice as an Athletic Trainer in the state of Iowa, will be a blow that might not be recoverable. In turn, the health and wellness of our youth athletes WILL be compromised.

I am disheartened this suggestion has taken place. I am hopeful that we can steer the thought process of those making these decisions back to focus on what's most important, the well being of our future generations.

I would love to talk with you in more detail about this matter, if you are so inclined. Please feel free to call me anytime you are available, even if it is only for a few brief moment. I am available by cell [REDACTED] at any time; morning, afternoon, nights, weekends, holidays, whenever.

I appreciate your time reading through this email.

--

[REDACTED]

From:

To:

bcrccomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Subject: Licensure Changes

Dear Board and Commission Review Committee,

I am writing to place my public comment and stance on the current motion that the Iowa Chiropractic Licensure Board should NOT be combined and merged with any other boards. This creates many ethical issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[Redacted signature block]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Board of Athletic Training
Date: Thu Aug 31 2023 11:56:27 CDT
Attachments:

To whom it may concern,

My name is [REDACTED] and I am an athletic trainer (AT) at Iowa State University. I am currently one of 1,129 AT's who are licensed and countless students who rely on licensing in the State of Iowa. It has recently been recommended by the Department of Inspections, Appeals and Licensure that the Board of Athletic Training be eliminated. Please consider opposing this action for the reasons outlined below. This decision would have far reaching impact and be detrimental to far more than just 1,129 athletic trainers licensed in the state.

***** That licensure protects the public and lets clients and employers easily know an AT is properly trained, taking continuing education, and monitored.

***** The Board helps provide scope of practice guidance and protects the public from untrained persons.

***** There is no expense associated with the Board of Athletic Training. The fees that AT's pay to renew their license cover all costs. They are cost-effective and are consistently in the black each year.

***** Every state (except California who has pending legislation) and Washington D.C require licensure for AT's. Athletic trainers are healthcare professionals who specialize in the prevention, diagnosis and intervention of emergent, acute and chronic medical conditions involving impairment, functional limitations and disabilities. Athletic trainers are required to have a master's degree and a minimum of 50 continuing education units every two years keeping up with the best practices and emerging science. In addition to my Master's degree and 10+ years of experience, I have several certifications and trainings on top of that.

***** Athletic trainers provide medical services to all types of patients. Across the United States, in addition to practicing in traditional sports team settings, athletic trainers work in performing arts, public safety, occupational health, and with the armed forces.

***** Licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.

***** Eliminating licensure in IA could potentially impact an AT's ability to practice across state lines (travel with their team), depending on regulatory requirements in other states. (ex. some states allow you to practice in their state temporarily, provided your home state maintains the same regulatory requirements)

Please take into consideration my comments and the far reaching impact a decision of this magnitude would have.

Best Regards,

[Redacted signature block]

From:

To:

bcrccomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Subject:

Re: proposed changes to chiropractic licensing

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[Redacted signature]

[Redacted signature]

[Redacted signature]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Rule change combining governing boards of Chiropractic with Physical
Therapists
Date: Thu Aug 31 2023 11:58:09 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time. These different types of healthcare have very different entities within them that involve much more liability and comprehensive medical expertise. They should NOT be governed under the same board.

Sincerely,

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Public Comment - Chiropractic Board
Date: Thu Aug 31 2023 11:59:20 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * The proposed combination combines the board into professions that compete in the marketplace. This opens the door for potential conflicts of interest amongst board members who may favor one profession over another.
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,
[REDACTED]
[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Licensure Restructuring
Date: Thu Aug 31 2023 12:02:45 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

--

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Licensure Issues
Date: Thu Aug 31 2023 12:04:14 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.

This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions

We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

Sent from Yahoo Mail on Android

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Iowa Chiropractic Licensure Board
Date: Thu Aug 31 2023 12:04:18 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Massage Board Consolidation
Date: Thu Aug 31 2023 12:06:17 CDT
Attachments:

To whom it may concern. I am writing in opposition to colidating the Iowa massage Therapy Board with other boards. As a LMT in Nebraska and Iowa, a spa owner in IA and an educator for hydrotherapy in Nebraska, this consolidation is a bad idea.

A board for any professional should be filled with people WITHIN that profession. They know the details of said profession better than others and can make informed recommendations and decisions about that profession.

Please do not move forward with consolidation.

~ [REDACTED]

--

[REDACTED]

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Chiropractic licensure
Date: Thu Aug 31 2023 12:10:00 CDT
Attachments:

To whom it may concern:

Its been brought to my attention through our state associated, the ICS, that Chiropractic is being considered to be lumped together with other professions(physical therapy, massage) to save on licensure costs. I think this is a mistake for a few reasons:

1. Safety-our profession knows industry specific guidelines, which will be lost if the board is diluted.
2. Volunteers-we currently have a hard time getting volunteers to serve on boards and this will worsen the problem.
3. Investigations into board related violations are already an issue and this will make matters worse.

Thank you for listening, its my recommendation that Chiropractic stay as its own licensing board.

Sincerely,

[REDACTED]

From: [REDACTED]
[REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject:
Date: Thu Aug 31 2023 12:16:03 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.
- * We are a distinct profession and it takes the same provider-type in the profession to respond to public safety and other consumer concerns. I wouldn't want a PT or OT or MT provider determining if my DC treatment was appropriate or not.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

Sent from my iPhone

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Board importance.
Date: Thu Aug 31 2023 12:17:51 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

--

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Licensure Board grouping
Date: Thu Aug 31 2023 12:18:58 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Massage Board Consolidation
Date: Thu Aug 31 2023 12:20:47 CDT
Attachments:

I strongly feel that there should NOT BE A Consolidation of Massage Therapy with other medical related practices!

Sent from Mail App on Android

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic Training Boards and Commissions Review
Date: Thu Aug 31 2023 12:22:57 CDT
Attachments: image.png

Good Afternoon,

My name is [REDACTED], and I am an Athletic Trainer residing in eastern Iowa. I work at [REDACTED] to perform concussion rehabilitation, stroke rehabilitation, and sports vision training to athletes of all ages and levels of recovery from injury from not only the state of Iowa, but others that travel from across the nation. I am also a mother of two and wife to an Athletic Trainer.

I reach out to you today regarding the proposed changes to committees/boards in our state and particularly the recommended elimination of the Board of Athletic Training. The gold standard for an Athletic Trainer is to reside and practice in a state that requires the professional to hold their Athletic Training License. This license makes it safe for members of the sports medicine team that range from coaches and athletes to parents and physicians to each play their part in an athlete's care. When an athlete becomes injured it is the Athletic Trainer's duty to evaluate them and create their plan of care. Without this liaison between the athlete, parent, coach, and physician, athletes in any setting are left without an educated healthcare professional to keep them safe in emergency situations, injury and illness referral situations, and injury recovery situations.

In the nine years I have been a Board Certified and state licensed Athletic Trainer, I have spine boarded athletes, been a part of post-operative treatment and therapy teams, and created and implemented preventative care. Without the particular skill set of an Athletic Trainer, many of these athletes would have suffered from life long effects at such a young age. Because of the presence of an Athletic Trainer, they have had a normal life and were able to continue growing/learning as they were meant to.

As a government that is looking to progress, I ask you to reconsider eliminating the Iowa Board of Athletic Training and continue to require Athletic Trainers in the state of Iowa to be licensed by the state. Instead of regressing, I ask that the legislators vote to continue advancing our healthcare professions.

Thank you for your time and dedication to keeping our state a safe place for our athletes to play, work, and grow.

Sincerely,

--

[REDACTED]

Notice: The information in this message may contain information protected by the federal regulations under the Health Insurance Portability and Accountability Act (HIPAA) of 1996 (45 C.F.R. Parts 160-64) and is privileged and confidential, protected from disclosure, and is intended only for the use of the individual or entity to whom it is addressed. If the reader of this message is not the intended recipient any dissemination, distribution or copying of this communication is strictly prohibited. If you have received or are viewing this message in error, please notify the sender immediately by reply e-mail and delete the communication from your system. Thank you.

Owner:

Filename:

image.png

Last Modified:

Thu Aug 31 12:22:57 CDT 2023

PLAY HARD



PLAY SAFE

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Urgent regarding Iowa Board of Chiropractic
Date: Thu Aug 31 2023 12:23:41 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions.
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

My kindest regards,

[REDACTED]
[REDACTED]
[REDACTED]

The information in this email is legally privileged, confidential, and intended only for the individual or entity to whom it is addressed. If you are not the intended recipient, you are hereby notified that viewing, disseminating, distributing, or copying this email message is strictly prohibited. If you received and/or are viewing this email in error, please notify the sender by reply email, and delete this email from your system immediately. Thank you.

Sent with Proton Mail secure email.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Proposal to end Athletic Trainer license
Date: Thu Aug 31 2023 12:25:50 CDT
Attachments:

Good morning,

My name is [REDACTED], I am an athletic trainer who owns a business in the Des Moines area, we provide sports medicine services to athletes across the state of Iowa and I employ multiple athletic trainers.

I am very concerned about the elimination of the Board of Athletic Training. There are over 1,000 licensed athletic trainers in the state of Iowa and they rely on the Board to create rules and regulations around the profession and determine scope of practice in the state.

This elimination would make Iowa one of the only states that does not require a license to practice athletic training in the country. As an employer, this could lead to fewer athletic trainers wanting to move here, or fewer graduates wanting to stay because there is less regulation and oversight. We are healthcare professionals that provide a valuable service across the state, and this elimination would undermine that.

My business was created to provide healthcare services to the people that typically do not have access to athletic trainers. This was after working as the AT for the Iowa State football team, thinking that all athletes should have this type of access to an athletic trainer. We currently provide ATs to several rural high schools and some in the Des Moines area, as well as youth sports leagues all over the state. Removing this licensure would allow anyone to claim to be the "athletic trainer" even if they do not have necessary requirements to practice.

This license protects members of the public because they know that the person practicing in their school and in their community is a licensed professional. Not having that reduces the protection for the public. My work in youth leagues across the state has shown me how important it is to provide these young athletes access to a qualified, licensed professional. I would strongly encourage you to reconsider the elimination of the Board of Athletic Training.

I am happy to answer any questions if needed. Please feel free to reach out by email.

--

[REDACTED]



From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: RE: Combining the Iowa Chiropractic Licensing Board with other boards
Date: Thu Aug 31 2023 12:27:38 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

I appreciate your time and effort in this matter and ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Board/Committee Changes
Date: Thu Aug 31 2023 12:28:43 CDT
Attachments:

Committee Members,

My name is [REDACTED], a Cedar Rapids resident and a parent of two children, one of which participates in sports and one who will begin soon. I am NATABOC (National Athletic Training Association Board of Certification) certified, state of Iowa licensed, and practicing athletic trainer working in concussion and traumatic brain injury rehabilitation.

I am reaching out with concern, to comment on the proposed changes to committees/boards in our state and in particular the recommended elimination of the Board of Athletic Training. I cannot begin to state how alarming this proposed change is. Athletic trainers play a vital role in the safety of young athletes daily. The presence of athletic trainers allows coaches to coach and allows a licensed healthcare provider to help prevent, provide prompt evaluation, treat, and rehabilitate injuries. Additionally, if an emergency occurs, athletic trainers are present to provide the necessary immediate care and activate an emergency action plan. Finally, and more specifically, with concussion care being the forefront topic that it is, having trained and licensed healthcare professionals onsite who have the working knowledge and education to correctly identify and treat head injuries accurately and effectively is necessary for safe participation in sports.

There are many stories of the importance of athletic trainers both locally and nationally, too many for this email. The ones that stick out most recently on the biggest stage are that of Demar Hamlin on Monday Night Football in January and Bronny James at USC just a few weeks ago. In both situations, certified athletic trainers saved the lives of an athlete that had sudden cardiac events. Athletic Trainers deal with many types of current life altering moments for young athletes and parents in ways that impact those families for years to come following the event. In each case, having a licensed healthcare professional onsite increases the chances of having a positive outcome. Having to call medical help or having someone without the right qualifications present lead to increased amounts of negative outcomes. Athletic trainers are the professionals that are trained to be onsite and provide the proper and essential care for these injuries.

The move to eliminate the Board of Athletic Training is a backward step in comparison to the rest of the country. Across the US, 49/50 states have some form of regulation of the profession of athletic training. The one remaining state has an active bill which would require regulation of the practice of athletic training. Licensure is required in 47/50 states. Thus, by moving away from licensing athletic trainers in our state, we would be moving in the opposite direction of everyone else and in this case, being different is not a good thing.

Finally, as a parent, I want my kids to be safe when participating in sports. I know injuries will happen, but I expect the school or organization to have the properly trained individuals on site to provide care. Removing the Board of Athletic Training and licensure system takes away an important and effective means to ensure qualified individuals are providing that care.

Thank you for the consideration of these comments and I ask that you reach out to the committee members making this decision and reconsider the elimination of the Board of Athletic Training.

Please help us keep our athletes safe.

Sincerely,

[Redacted signature]

[Redacted contact information]

From: [REDACTED]
To: BCRC Comments <bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: virtual option
Date: Thu Aug 31 2023 12:28:46 CDT
Attachments:

Good afternoon,

I am currently a member of one of Iowa's boards and would like to participate in this meeting. It is impossible for me to attend in person, but feel that participation will benefit my board and my profession. Will there be an option to join this meeting virtually? I would be very appreciative if it could be made available so that public participation can be expanded to those who hold many responsibilities and obligations.

Please let me know what decision is made and send me link if it is made available.

Regards,

[REDACTED]
Board of Nursing Chairperson

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic Training Licensure
Date: Thu Aug 31 2023 12:32:42 CDT
Attachments: Outlook-mq2qexuh.png

As a licensed athletic trainer for over 18 years, I strongly recommend we keep the state licensure for athletic training. We must have a standard of care in Iowa to insure we have well qualified medical professionals on the sidelines and gyms of high schools and of course in the college setting I am in now. I have covered high school sports for over 20 years and many times I am the only health care provider available. We need more athletic trainers in schools and we must keep the licensure to maintain the high quality of care. Thank you for your time.

[REDACTED]

Owner:

[REDACTED]

Filename: Outlook-mq2qexuh.png

Last Modified: Thu Aug 31 12:32:42 CDT 2023



From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>; jeff.edler@legis.iowa.gov
<jeff.edler@legis.iowa.gov>; dave.deyoe@legis.iowa.gov
<dave.deyoe@legis.iowa.gov>; [REDACTED]
Cc:
Bcc:
Subject: Athletic Trainer Licensure
Date: Thu Aug 31 2023 12:37:45 CDT
Attachments:

Good afternoon,

I wanted to reach out about the recent announcement that the Board of Athletic Training and Athletic Training licensure may be removed. As a parent, this is a huge concern for me. Athletic Trainers are already an undervalued resource in many of our school districts. They are essential personnel to the safety and security of our young athletes. We need to do more to strengthen this profession and continue to encourage schools to ensure athletes have access to a qualified medical professional.

By removing this board and or licensure we are putting not just this profession but our athletes at a huge risk. You can do your own independent research, you can look at the situation for Damar Hamlin, and countless other examples of times Athletic Trainers were essential to saving the lives of athletes in their care. This is not a job for just anyone. It is the job of a licensed, educated, professional Athletic Trainer.

Thank you for your time,
[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Licensure Board grouping
Date: Thu Aug 31 2023 12:50:21 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

From: [REDACTED]
To: jack.whitver@legis.iowa.gov
<jack.whitver@legis.iowa.gov>; brian.lohse@legis.iowa.gov
<brian.lohse@legis.iowa.gov>; bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Re: The Elimination of the Board of Athletic Training
Date: Thu Aug 31 2023 12:53:51 CDT
Attachments:

Hello,

I am writing today to ask you to please strongly consider keeping the Board of Athletic Training. It is important to me that you support AT's maintaining licensure.

They are medical professionals, and they are important in my community.

Here is some information:

—That licensure protects the public and lets clients and employers easily know an AT is properly trained, taking continuing education, and monitored.

—The Board helps provide scope of practice guidance and protects the public from untrained persons.

—There is no expense associated with the Board of Athletic Training. The fees that ATs pay to renew their license cover all costs. They are cost-effective and are consistently in the black each year.

—Every state (except California who has pending legislation) and Washington D.C require licensure for ATs....Athletic trainers are healthcare professionals who specialize in the prevention, diagnosis and intervention of emergent, acute and chronic medical conditions involving impairment, functional limitations and disabilities.

—Athletic trainers provide medical services to all types of patients. In addition to practicing in traditional sports team settings, athletic trainers work in performing arts, public safety, occupational health, and with the armed forces.

—Licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.

— Eliminating licensure in IA could potentially impact an AT's ability to practice across state lines (travel with their team), depending on regulatory requirements in other states. (ex. some states allow you to practice in their state temporarily, provided your home state maintains the same regulatory requirements)

Thank you ,

[REDACTED]

Supporter of our local AT's

From:

To:

bcrccomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Subject:

Iowa Chiropractic Licensure Board

Dear Board and Commission Review Committee,

I am writing to give my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * Creating a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. I ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

From:

To:

bcrccomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Subject:

RE: Proposed Chiropractic Licensure Board merger

Dear Board and Commission Review Committee,

I appreciate the idea of a smaller government and lowered expenditures. However, I am writing to share the opinion that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases. Especially when the proposed merge is with professions that do not manage care in the same manner and often seek to devalue our role in healthcare and discourage utilization of chiropractic.

- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions

- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering my comments. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time. Chiropractic was started in Iowa as a unique and defined profession and I believe strongly that the profession should be governed and regulated by its own colleagues and supporters and not those with other interests.

Sincerely,

[Redacted]

[Redacted]

Find us on:

CONFIDENTIALITY NOTICE:

The information contained in this e-mail message and any attachment(s) is the property of [REDACTED] and may be protected by state and federal laws governing disclosure of private information. It may contain information that is privileged, confidential, or otherwise protected from disclosure. It is intended solely for the use of the addressee. If you are not the intended recipient, you are hereby notified that reading, copying or distribution of this transmission or the information herein by anyone other than the intended recipient is STRICTLY PROHIBITED. The sender has not waived any applicable privilege by sending the accompanying transmission. If you have received this transmission in error, please notify the sender and delete the message and attachment(s) from your system.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Please do not merge chiropractic licensure board
Date: Thu Aug 31 2023 13:07:03 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. I ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Chiropractic Board Response
Date: Thu Aug 31 2023 13:07:51 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

***** This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.

***** This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions

***** We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely, [REDACTED]

Sent from Mail for Windows

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Iowa Chiropractic Licensure Board
Date: Thu Aug 31 2023 13:08:15 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Board Combination
Date: Thu Aug 31 2023 13:09:58 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Iowa Chiropractic Licensure Board combining with other boards
Date: Thu Aug 31 2023 13:12:47 CDT
Attachments:

To whom it may concern,

I am concerned with the combining of the boards for the following reasons:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions.
- * We currently getting adequate investigations going in a timely manner to protect our profession and this will make the issue worse.

Thank you,

[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Chiropractic Board change
Date: Thu Aug 31 2023 13:13:17 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases. Chiropractors are primary care physicians in Iowa and must of knowledge of Chiropractic and our unique scope on those who serve on this board.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Licensing Mergers
Date: Thu Aug 31 2023 13:14:26 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic

Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

[REDACTED]

Sent from my iPhone

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Elimination of the Board of Athletic Training
Date: Thu Aug 31 2023 13:31:47 CDT
Attachments:

I am submitting this comment to advocate AGAINST the elimination of the Board of Athletic Training in Iowa. There are currently 1,129 licensed athletic trainers in the state of Iowa and countless students, families, and patients that rely on them for care. Athletic trainers are healthcare professionals who specialize in the prevention, diagnosis and intervention of emergent, acute and chronic medical conditions involving impairment, functional limitations and disabilities. Athletic trainers provide medical services to many types of patients. Across the United States, in addition to practicing in traditional sports team settings, athletic trainers work in performing arts, public safety, occupational health, and with the armed forces. Every state (except California who has pending legislation) and Washing D.C require licensure for ATs. Licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession. Licensure protects the public and lets clients and employers easily know an AT is properly trained, taking continuing education, and is monitored. The Board of Athletic Training helps provide scope of practice guidance and protects the public from untrained persons. There is no expense associated with the Board of Athletic Training. The fees that ATs pay to renew their license cover all costs. The Board of Athletic Training is cost-effective and is consistently in the black each year. Eliminating licensure in IA could potentially impact an AT's ability to practice across state lines, such as travel with their school's athletic teams, depending on regulatory requirements in other states. (ex. some states allow you to practice in their state temporarily, provided your home state maintains the same regulatory requirements). Please vote against the elimination of the Board of Athletic Training.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Chiropractic Licensing
Date: Thu Aug 31 2023 13:51:38 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: OPPOSITION towards the elimination of the Board of Athletic Training and
Licensure
Date: Thu Aug 31 2023 13:52:37 CDT
Attachments:

To whom this may regard,

As a Graduate student working towards my master's degree of Science- Athletic Training, I am writing this email to formally state my complete opposition in the move to eliminate the Board of Athletic Training and Athletic Training Licensure. This will not only put the general population at risk, but also causes issues nationwide. Athletic Trainers are held to a very high standard caring for not only athletes, but also fans and other personnel at any given sporting event. Taking away Licensure gives any person the opportunity to practice MEDICINE, which is simply not safe. As we have witnessed with the Demar Hamlin incident, Athletic Trainers are the first healthcare responders to arrive and provide care at an emergency. This not only puts emphasis on the importance of the Athletic Trainer as a healthcare provider but shows how much education goes into being competent in this career. No normal bystander will have the knowledge and skills to handle any given medical emergency. This would be like putting a college freshman into an Operating Room and expecting them to perform surgery just because they are a Pre-Medical student.

Not only is this dangerous to the public, but it would be a horrible look for the state of Iowa. Currently, 47 states as well as the District of Columbia require licensure for practicing Athletic Trainers. Out of the 3 states who are without these laws, 2 of them are working towards requiring licensures. New York and Hawaii are both actively taking steps towards making this requirement. This leaves out California, which allows any single person to appoint themselves as a healthcare provider and act as an Athletic Trainer. If Iowa decides to take this step, they will be the minority sitting next to California as incompetent states who do not care about their population's safety.

The educational requirements of this career are extensive. As an Athletic Trainer, the job is to work with a patient starting from immediate emergency care until the second they have an injury up to their full return to activity. This encompasses injury prevention, diagnosis, immediate medical care, working through chronic and acute care, bringing the athlete back to functional abilities, and finally bringing them back into the competitive nature of their sport. No other healthcare career works with patients as extensively as an Athletic Trainer does. No other career will be able to replace or even handle the workload and knowledge that is required from an Athletic Trainer.

Finally, to appeal to the lucrative side of this issue. The Board of Athletic Training does not require any money from the government. Elimination of this Board will not save the state any

money whatsoever. Any and all fees are paid for by the members.

Eliminating the Board of Athletic Training and the Licensure requirements will put the public in danger, tarnish Iowa's reputation as California's currently is, and leave athletes to fend for themselves as they have untrained people trying to perform medical treatments without any proper training.

From:

[REDACTED]

To:

bcrccomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Bcc:

Subject: Iowa Chiropractic Licensure Board

Date: Thu Aug 31 2023 13:53:41 CDT

Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should NOT be combined and merged with any other boards. This would create many issues that would threaten public safety including, but not limited to:

- This creates a safety issue by combining and diluting the expertise of board members which would limit their knowledge and experience to oversee cases
- This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- We currently struggle ,as things currently stand, getting adequate investigations going in a timely manner to protect our profession. This will only exacerbate the serious issue further.

Thank you for considering my comments. I ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

From:

[REDACTED]

To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Bcc:

Subject: DO NOT ELIMANTE THE BOARD OF HEARING SPECIALISTS

Date: Thu Aug 31 2023 13:54:55 CDT

Attachments:

Please consider before any removals of the Board of Hearing Specialists.

The elimination of the Board of Hearing Aid Specialists would be an ill-advised policy decision that will put consumers and patients in harm's way. If the Board is eliminated, it will effectively deregulate our profession, allowing bad actors to flourish and jeopardize the integrity of the important services we provide in our communities—helping our patients hear better. We need your help to prevent this from happening. Please consider this so we can continue to educate our clients and help treat our patients to better there lives because they deserve it.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From:

[Redacted]

To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Bcc:

Subject: · Eliminating the Board and why licensing is necessary.

Date: Thu Aug 31 2023 13:58:02 CDT

Attachments:

Eliminating the Board will compromise the patient/specialist trust. It all boils down to trust that the patient feels the specialist is trained and prepared to help. No one is going to go to a doctor/specialist who has no credibility or professional education/training. You break that trust, you break the whole profession/services.

Sent from Mail for Windows

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Chiro licensure board
Date: Thu Aug 31 2023 14:00:33 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

This is a transmission from [REDACTED] and may contain information which is privileged, confidential, and protected by the doctor-client privileges. If you are not the addressee, note that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this transmission in error, please destroy it and notify us immediately at our telephone number [REDACTED]

From:

To:

BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Subject:

Iowa Board of Chiropractic

Dear Board and Commission Review Committee:

I am writing to place my public comment that the Iowa Chiropractic Licensure Board Should not be combined and merged with any other boards. I am a past board member, for 9 years, 4 years as chairman. This creates many issues that impact Public Safety including:

1. This creates a safety issue by combining and diluting the expertise on the board with knowledge to deal with cases.
2. This will tax volunteers to serve on these boards and will require additional meetings and hearings for different professions. It currently now can take many months to bring a case to a hearing.
3. They currently struggle with getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue. The department of inspections is understaffed with investigators.

Thank you for considering this comment. We asked for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[Redacted Signature]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc: Brian Patton <brian@ualocal33.org>
Bcc:
Subject: Public Comment
Date: Thu Aug 31 2023 14:13:50 CDT
Attachments: image001.png

Good Afternoon!

The Plumbers and Steamfitters Local #33 will be sending Brian Patton to represent our organization at the public hearing on September 6, 2023. Brian will be speaking about the merge of the Plumbing and Mechanical Systems Board, the elimination of the boiler board, and the re-organization of the Workforce Development Board. Please let me know if you need anything further. Thanks

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] NOTICE: This e-mail (including any attachments) may include privileged, confidential, or otherwise legally protected information that is for the sole use of the recipient. Any review, reliance, or distribution by anyone other than the intended recipient without express permission of the sender is strictly prohibited. If you are not the intended recipient, please notify us and permanently delete the e-mail and any attachments immediately.

Owner:

[REDACTED]

Filename: image001.png

Last Modified: Thu Aug 31 14:13:50 CDT 2023



PLUMBERS AND STEAMFITTERS
LOCAL UNION 33

**APPRENTICESHIP
TRAINING CENTER**

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Iowa Board of Athletic Training
Date: Thu Aug 31 2023 14:16:19 CDT
Attachments:

Mr. Larry Johnson & BCRC:

Thank you for taking public comment on this topic.

I would like to ask you to look into the Board and Commission Review Committee consolidation plan that would eliminate the Board of Athletic Training. In my opinion this would be a major mistake. Licensure of Athletic Trainers in the State of Iowa is vitally important to protect the active and athletic population of our state. This comes at a time when the need for comprehensive health care at a grass roots level is so important for our youth, high school and collegiate athletes. I know I am so much more comfortable when my daughters compete for the Ankeny Centennial Jaguars when I know that they have two certified athletic trainers ready to help any Jaguar athlete that needs attention. Could you comfortably watch a Jaguar football game if you knew there was not a licensed athletic trainer ready to help any of those young athletes that may need assistance at a moment's notice?

Even though you will see 30+ certified athletic trainers and graduate students this Saturday on the field during the UNI vs Iowa State Football game. Athletic Trainers provide healthcare services in so many more areas than the traditional sports setting than what you may see on Television. ATs are employed in medical clinics, with military deployments, public safety and industrial settings just to name a few.

Here are a few facts about Athletic Training and the Board of Athletic Training in Iowa:

- * Iowa currently has 1,129 licensed athletic trainers and countless graduate college students that heavily rely on our State of Iowa License.
- * Iowa Licensure protects the public and lets clients, patients and employers easily know that the AT is properly trained, completes continuing education and is monitored.
- * There is NO EXPENSE to taxpayers with the Board of Athletic Training. The fees that ATs pay to renew their license covers all costs. This board is cost-effective and in the black each and every year.
- * Every state (except California who has pending legislation) and Washington DC require licensure for Athletic Trainers. Licensure for the Athletic Trainer is the Gold Standard. And all Iowa ATs are proud to be one of the first states to have this legal protection in the early 90's.

* Athletic Trainers are included under the allied health professions category, as defined by the US Dept. of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPI's). [REDACTED]

* The American Medical Association (AMA) recognizes athletic trainers as allied health care professionals.

* Eliminating licensure in Iowa could potentially impact an Athletic Trainer's ability to practice across state lines (travel with University teams), depending on the regulatory requirements of other states.

Thank you for taking the time to consider this request to keep the Board of Athletic Training in its current form. As a resident of Ankeny and full-time athletic trainer at Iowa State University, I appreciate your willingness to serve our community and State.

Respectfully,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Iowa Chiropractic Licensure Board
Date: Thu Aug 31 2023 14:21:50 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Chiropractic Licensure Board
Date: Thu Aug 31 2023 14:23:52 CDT
Attachments:

Dear Board and Commission Review Committee,

As a chiropractor in Ankeny, I would like to take a moment to email you about something that has recently come to my attention. I believe the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. I feel it creates some items of concern. It makes it harder for the chiropractic board to focus solely on chiropractic. It will also require them to hear issues affecting other professions and will dilute their ability to focus on our quickly growing profession.

Thank you for your time in reading my comment. I ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Yours in Health,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

This transmission may contain information that is privileged, confidential and/or exempt from disclosure under applicable law. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, or use of the information contained herein (including any reliance thereon) is STRICTLY PROHIBITED. If you received this transmission in error, please immediately contact the sender and destroy the material in its entirety, whether in electronic or hard copy format. Thank you.

From:

To:

bcrccomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Subject:

Reconsider Chiropractic Board of Licensure Reorganization

Dear Board and Commission Review Committee,

Chiropractic is a unique and incredibly specific health care profession. Therefore, I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * Adequate investigations currently are difficult to process in a timely manner, and this will exacerbate the issue. This could put our profession in danger.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[Redacted signature]

[Redacted signature]

[Redacted signature]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Iowa Chiropractic License Board
Date: Thu Aug 31 2023 14:32:16 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.

This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions

We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment.

We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic Training Licensure
Date: Thu Aug 31 2023 14:41:27 CDT
Attachments:

Hello!

I am a young professional in the field of Athletic Training and I believe that a Licensure for Athletic Training is vital in not only the safety of primary, secondary, clinical settings, etc. but for the safety in multiple community activities. LICENSED Athletic Trainers are those out on all the fields and courts watching out for your kid, responding to their injuries, fighting against heat illness and so much more. The unfortunate scenario with Damar Hamlin is a prime example of the importance of an educated, licensed Athletic Trainer. Please do not eliminate licensure for athletic trainers.

[REDACTED]

--

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

CONFIDENTIALITY NOTICE: The foregoing message may contain confidential information belonging to the sender that is legally protected and/or privileged. This message is intended only for the use of the person(s) named above. If you are not the intended recipient, you are hereby notified that any disclosure, copying, dissemination, distribution, or action taken in reliance on the contents of this message is strictly prohibited. If you are not the intended recipient, please immediately contact the sender by reply e-mail and destroy all copies of the original message. Thank you.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: KEEP IOWA ATHLETIC TRAINER LICENSURE
Date: Thu Aug 31 2023 14:43:24 CDT
Attachments:

Hello,

I am reaching out to express the extreme importance of retaining licensure for athletic trainers in the state of Iowa. Athletic trainers are healthcare professionals who specialize in prevention, diagnosis and intervention of emergent, acute and chronic medical conditions. I have gone through 6 years of schooling in order to achieve my current licensure and retain my certification from the Board of Athletic Training. Licensure continues to provide student athletes and other patients within our realm, with the highest level of patient protection. In addition, athletic trainers are defined as healthcare professionals by the Department of Health and Human Safety and therefore should be required to hold licensure in order to treat patients to any extent in the state of Iowa. I hope it will be carefully considered before ridding the state of licensure for athletic trainers.

Sincerely,

[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Board of Athletic Training
Date: Thu Aug 31 2023 14:43:41 CDT
Attachments:

Mr. Larry Johnson,

I am writing to voice my opposition to the elimination of the Board of Athletic Training and licensure of athletic trainers in Iowa. This is very detrimental to not just our profession, but to the thousands of patients who athletic trainers care for every day in our state. Elimination of licensure would lead to danger and safety issues for all of our physically active patients, but especially our youth athletes.

In 2018, Athletic Trainers were the driving force behind passage of HF2442, which set standards for concussion management in youth sports. Athletic Trainers are the primary licensed health care providers on the sidelines for all of Iowa's high school football games and other interscholastic sporting events. Removing our licensure would conflict with current Iowa code in this area and cause unresolvable problems for high schools trying to protect their students.

California is the only other state without regulation for athletic trainers, and I don't want to see Iowa compared to that state as the only two states who allow delinquent health care professionals to come practice and place our residents in danger.

Licensure provides the highest level of patient protection, and it is the gold standard of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.

I realize our profession requires certification from the BOC, however that is not enough. According to our current practice act, the initial certification exam is the only BOC requirement for license in Iowa. Thus, we need ongoing regulation of our profession that only licensure can ensure. I assure you that athletic trainers in good standing in Iowa want to maintain licensure. Having the regulation actually attracts people to come work here as opposed to making it more difficult.

Eliminating licensure in Iowa could potentially impact an AT's ability to practice across state lines (travel with their team), depending on regulatory requirements in other states. (ex. some states allow you to practice in their state temporarily, provided your home state maintains the same regulatory requirements).

I also realize the goals of your committee are to deregulate and compress boards. I would like to offer some middle ground. We feel the merging Athletic Trainers with PTs, OTs, and other related professions would be reasonable and meet our needs.

Please let me know if I can expand any further on anything. I can be reached on my cell phone any time at [REDACTED].

Thanks,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: BCRComments@iowa.gov
<bcrcomments@iowa.gov>
Cc:
Bcc:
Subject: Hearing Aid Licensing
Date: Thu Aug 31 2023 14:45:41 CDT
Attachments:

Dear Governor Reynolds, and to whom it may concern,

I am writing in regards to you wanting to eliminate the Licensing for Hearing Aids prescription. I cannot believe that you would bring this up again, when it has failed to go through 2 times! If this is money related as far as, not making the State enough money, I would ask you if you would like an employee from god knows where to fit hearing aids to your friends or family members, knowing that the wrong prescription could damage their hearing worse or not help at all to make their life more fulfilling, because it is a PRESCRIPTION for a medical issue! Have you ever sat in on a Hearing Exam, or sat in on a fitting for hearing aids, I think you would be totally surprised how technical it all is. That is why we need Hearing instrument specialist and Audiologist that have been fully licensed to treat their patients PERSCRIPTIONS. Our Specialist make ear impressions every day, which means they have to put a special type of foam in their ear to make a custom impression, do you really think that anyone would be able to do that without seriously hurting a patient!

I believe there are 55 Boards that you are trying to eliminate, why don't you eliminate the boards that do not have to touch patients and put instruments in their ears, and that are not medical related, and leave the medical ones to the professionals! You are supposed to be working with the people of Iowa not against them, but you are trying eliminating something that could really harm someone! I am always a big supporter of yours, but this, I feel is ridiculous, you trying to eliminate or down play a medical procedure that you know nothing about!

We have had many patients come into the office that have tried the OTC, and they come right back to the office and say those hearing aids are a joke and they got ripped off, they did not work, and were not able to return them! The older generations just think it is another way of disregarding them in this state!!

I would hope that you take all the arguments on this matter to heart, because one day, I assure you, you will need hearing aids, and I don't think that you will want any Joe schmo digging in your ears!

Thank you for your time and consideration.

[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Hearing Instrument Specialist deregulation
Date: Thu Aug 31 2023 14:56:26 CDT
Attachments:

I am writing in opposition to the deregulation of licensing for Hearing Instrument specialist in Iowa. I am a board-certified hearing instrument specialist and have been licensed in Iowa for 20 years. I am the largest employer of hearing instrument specialist in Iowa with 41 hearing specialist that work for me. Last year we fit over 4000 Iowans with hearing aids from licensed trained professionals.

There are countless reasons why the de regulation of our profession is a terrible idea. We fit prescriptive medical devices that require extensive training and licensing to be able to fit patients properly and effectively. In the course of our work, we are trained to discover underlying medical conditions that can be medically serious that require the intervention of a doctor or ENT. These conditions can be something as simple as impacted earwax, or something more significant like brain tumors. Untrained and unlicensed individuals have no ability to recognize these serious, underlying medical conditions, and these patients would go untreated, and could have a very significant impact on their health.

Last October the FDA approved over the counter hearing aids. They develop two classifications of hearing aids. Over-the-counter hearing aids require no hearing test no evaluation and are not seen by a licensed professional. The other class of hearing aids are referred to as prescription hearing aids. Prescription, hearing aids are required to be fit a licensed professional. This would eliminate the entire category of prescription hearing aids with deregulation. Prior to the launch of over-the-counter hearing aids there were many surveys done throughout the industry to evaluate the public's perception of the need of a license professional to fit and treat the hearing loss properly. In countless studies up to 96% of individuals acknowledged the importance of the interaction with a licensed hearing care professional to properly treat their hearing loss.

Since the launch of over-the-counter hearing aids, our business is actually up by over 20%. Over-the-counter hearing aids have had no impact whatsoever on the hearing aid industry. I believe this solidifies the understanding and the need for licensed trained professionals to treat the patients properly and effectively.

Deregulation of licensing for hearing instrument specialist would open the door for anyone to fit the unknowing and vulnerable, predominantly, senior population. The outcomes of these fittings would be very poor and the consequences to the patients would be astronomical. If a person tries hearing aids and is unsuccessful with them statistically they wait 5 to 7 years to try hearing aids again. In the course of that time the hearing loss can become so great that hearing aids even at a premium level are ineffective. Recent studies have shown

that untreated hearing loss has a significantly higher chance of developing Alzheimer's and dementia. There are higher risks of falling, social isolation, and depression for those with untreated, hearing loss.

The International Hearing Society administers the license exam for hearing instrument specialist in 40 states. There is significant training and learning involved to be able to pass the international license exam. The exam is designed to prove total competency to be able to safely and effectively work in our profession. Even with this extensive training the first time pass rate of the exam is only 60%. So even properly trained individuals require a great deal of time to be able prove competency. What would an individual with no training whatsoever be able to do for an unsuspecting person in need of proper hearing healthcare?

There are many other reasons why eliminating the hearing instrument specialist board is a very poor idea for the interest of thousands of lowans. Please take this into consideration thank you.



“ Dream Big, Make Plans, & Smash Goals”

From: [REDACTED]
To: BCRCcomments@iowa.gov
<brcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Iowa Chiropractic Board Merge
Date: Thu Aug 31 2023 15:12:00 CDT
Attachments:

Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

CONFIDENTIALITY NOTICE: The information transmitted in this message is intended only for the person(s) or entity to which it is addressed and may contain confidential and/or legally privileged material. Delivery of this information to any person other than the intended recipient (s) is not intended in any way to waive privilege or confidentiality. Any review, transmission, dissemination or other use of, or taking any action in reliance upon this information by entities other than the intended recipient is prohibited. If you have received this information and you are not a named recipient, please notify this sending company, delete the information from any

computer and destroy all copies.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Elimination of the Board of Athletic Training
Date: Thu Aug 31 2023 15:20:03 CDT
Attachments:

Hello to whom this may concern,

My name is [REDACTED], a current graduate student in the Master's of Science in Athletic Training at the University of Iowa. It has come to my knowledge that the Iowa government is in the process of possibly removing the Board of Athletic Training and eliminating the licensure. I am here to give some knowledge on what the athletic training profession does and why we are fighting to keep this board!

To begin with the athletic training profession consists of health care professionals that specialize in the prevention, diagnosis and intervention of emergent, acute, and chronic injuries. We provide services to all kinds of patients that include but are not limited to sports teams, performing arts, public safety, occupational health, and the armed forces. Eliminating our licensure allows us to provide the highest level of patient protection for the public's safety. The American Medical Association also recognizes athletic training as an allied health care profession and so should our government.

I appreciate whoever this may be for taking the time to read this and take these comments into consideration as the decision for this action is taken in the next few days!

Thank you,
[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Board Merger
Date: Thu Aug 31 2023 15:23:20 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board's knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

[REDACTED]

From:

[REDACTED]

To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Bcc:

Subject: Fwd: LICENSURE CHANGES IN IOWA - NEED YOUR HELP

Date: Thu Aug 31 2023 15:38:42 CDT

Attachments:

Sent from my iPhone

Begin forwarded message:

[REDACTED]

From:

[REDACTED]

Date: August 31, 2023 at 11:30:56 AM CDT

To:

[REDACTED]

Subject: LICENSURE CHANGES IN IOWA - NEED YOUR HELP

Call to Action - Licensure Changes in Iowa

August 31, 2023

Dear Members,

Governor Reynolds and the Boards and Commissions Review Committee created a report that is reviewing all licensure boards on efficiency and effectiveness. Recommendations have come out to reorganize and merge the Iowa Chiropractic Licensure Board.

In talking with the Department, the Iowa Chiropractic Licensure Board may be combined with physical therapy, occupational therapy and massage therapy.

The Board of Directors for the Iowa Chiropractic Society are concerned for this reorganization due to the following reasons:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions.
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

CALL TO ACTION

With the holiday coming up, I am asking you to send a message highlighting the three points above and email it to the Board and Commission Review Committee at BCRCcomments@iowa.gov before Wednesday, September 6, 2023.

Sample Message:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions

* We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[Insert Name, Credentials and Address]

Sincerely,

Iowa Chiropractic Society

staff@iowadcs.org
membership@iowadcs.org

Follow us on Facebook

400 East Court Avenue, Suite 126 Des Moines, Iowa 50309
Phone: (515) 867-2800
Website: <https://www.iowadcs.org>

If you would like to unsubscribe: [Click Here](#)

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Board of Athletic Training & Licensing
Date: Thu Aug 31 2023 15:53:57 CDT
Attachments:

Dear Board & Commissions Review Committee,

We are writing with regards to the proposed elimination of the Board of Athletic Training & licensing. The word of this concerns us both from the welfare of our athletes especially our kids. Athletic Trainers are our first responders to our athletics - many who are kids! They are trained to evaluate the situation & respond in a profession way while taking the athletes welfare in mind! They specialize in preventing other serious injuries while diagnosing the acute medical condition just like others in the medical profession.

By licensing this profession it ensures our kids get the highest level of patient care.

Taking this away would put our kids at risk of not getting the immediate care they need!

As parents we have seen our child have to have this & are thankful for the response he got! Without it he could have had other serious affects from his injuries!

Iowa needs to be in the forefront of ensuring our athletes (most of them are kids) are taken care of & treated with the best care possible & it starts with our first responders which in many times for athletes are Athletic Trainers!

Please do not take this away from our kids & allow this profession to be treated as it should be - a health care profession!

Sincerely,
[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Chiropractic Board changes
Date: Thu Aug 31 2023 15:55:33 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

--

[REDACTED]

DEDICATED TO JOINING FAMILIES IN THEIR JOURNEY TO CREATE CHANGE FOR THE FUTURE

[REDACTED]

[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>; Nick Laning <nick@advocacyiowa.com>;
IBEW 704 Tom Townsend (tom@ibew704.com) <tom@ibew704.com>;
Threase Harms, Lobbyist (threase@advocacyiowa.com)
<threase@advocacyiowa.com>
Cc:
Bcc:
Subject: Speaking at Hearing
Date: Thu Aug 31 2023 15:56:47 CDT
Attachments:

To Whom it may concern

I would like to speak at the public hearing dealing with State Board realignments on September 6th. I would like to give some comments on behalf of the IBEW State Conference as one who was involved with creating the Iowa Electrical Board and as a previous board member.

Thank you in advance for your attention with this matter.

[REDACTED]
IBEW 288

Get Outlook for iOS

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc: [REDACTED] Dawn
Driscoll-StateSenate <dawn@driscoll4senate.com>; Driscoll, Dawn
[LEGIS] <dawn.driscoll@legis.iowa.gov>
Bcc:
Subject: Discontinuing Athletic Trainer licensure requirements
Date: Thu Aug 31 2023 15:59:12 CDT
Attachments: image001.jpg
image002.png

To Whom It May Concern,

I was notified this afternoon that a proposal to discontinue licensure requirements for Athletic Trainers in Iowa is fast approaching a decision.

I am writing to share my disappointment in the very consideration of doing so and the frustration with the lack of understanding that must exist on the degree to which this will adversely affect our student athletes.

As a hospital CEO, in an organization that employs licensed Athletic Trainers of the highest caliber, and makes such expertise a priority to provide to the schools in our service area at no cost to the districts, I am extremely concerned that this decision will destroy the professionalism and integrity of the discipline. A decision to eliminate licensure for Athletic Trainers would have a similar impact of eliminating licensure for the other professionals in healthcare such as physicians, nurses, etc. The license is the key to ensuring competency and consistent application of skills that are in the best interest of the patient. With concussion protocols in their infancy and varying stages of acceptance, the timing to strip away this professional credentialing requirement is negligent to care that must be given to our youth. A decision in favor of this action from a quality of healthcare perspective alone serves as a clear statement of indifference that every Iowa parent, healthcare professional, coach, and citizen in general should be extremely concerned about, not to mention the concern we should have about those making such a decision.

I beg your consideration to not eliminate licensure requirements for Athletic Trainers for the sake of our youth, their futures, and those who have invested so much to achieve higher and

higher standards for the care of sports related injuries. Do the right thing, you will be proud you did.

Sincerely,

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Confidentiality Notice:

This email message, including any attachments is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.

Owner:

[REDACTED]

Filename: image001.jpg

Last Modified: Thu Aug 31 15:59:12 CDT 2023



COMPASS MEMORIAL
HEALTHCARE
Waverly, Iowa

#1 TOP
MID-SIZED
HEALTHCARE
EMPLOYER
2021 & 2022

Des Moines Register

Owner:

[REDACTED]

Filename: image002.png

Last Modified: Thu Aug 31 15:59:12 CDT 2023



COMPASS MEMORIAL

HEALTHCARE

Discover the difference

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: HEARING INSTRUMENT SPECIALIST DEREGULATION
Date: Thu Aug 31 2023 16:00:08 CDT
Attachments:

I am writing in opposition to the deregulation of hearing specialists in Iowa.
I am a board certified hearing specialist licensed in Iowa.
I have been testing and fitting for 14 years
There are so many reasons this is a terrible idea.
Hearing health is so important, fitting aids correctly with skilled and trained professionals
Is extremely important to identify issues that require medical referrals. This can only happen
with education and oversight of the FDA and specialized boards.
Please reconsider this poor direction. Imagine yourself or loved ones going to a non licensed
office and receive poor and or dangerous care.

[REDACTED]

Sent from my iPad

From:

[REDACTED]

To:

BCRCcomments@iowa.gov
<brcrccomments@iowa.gov>

Cc:

[REDACTED]

Subject:

Hearing Instrument specialist deregulation

Hello,

I am writing this in opposition to the deregulation of HIS. I studied and trained for this job in Luebeck Germany for 3 years. Here in Iowa, it is also an extensive training which one must go to in order to pass the exams.

For that to be completely wiped out would be a disgrace. I've been in this industry for roughly 4 years. I am still making plenty of new experiences with hearing losses I've never seen before and situations I've never been in.

This job is challenging in so many aspects. You must have an extensive comprehension and proper training of Audiology, Hearing Aid fitting, Technology, Testing etc.

Anyone who agrees with the deregulation of HIS, I urge you to test a patient, fit them with hearing aids, and see how it goes. Hearing aids are very complex devices. There is no one size fits all solution.

There are countless reasons to stick with the regulation of HIS. Thank you.

[REDACTED]

[REDACTED]

[REDACTED]

Office location:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Re: Proposed Board of Athletic Training elimination
Date: Thu Aug 31 2023 16:12:30 CDT
Attachments: image001.jpg

Dear Review Committee,

Please accept this email as my formal opposition to the proposed elimination of the Iowa Board of Athletic Training and the associated state licensure. As a member of the athletic training profession practicing in Iowa I would truly be disappointed in this state if this action were to occur. I have been certified and licensed in multiple states for the past 20 years and understand the strides this profession has made and the positive impact it has on our communities.

Currently, 47 states require licensure for athletic trainers to practice. Why should the great state of Iowa be any different? Our active populations, including high school and college athletes, deserve to have access to a professional that has been licensed by a state regulatory board. Additionally, the potential act would negatively impact the ability of certified athletic trainers work across state lines with the appropriate regulatory requirements that was granted by the Sports Medicine Licensure Clarity Act.

The fact that this step is even being discussed is deeply concerning to me as a professional, as a parent and as a citizen of this great state. I am confident that when the facts have been reviewed the appropriate action will be taken and this licensure will be continued.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



Owner:

[REDACTED]

Filename: image001.jpg

Last Modified: Thu Aug 31 16:12:30 CDT 2023



From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Advisory Boards and Commission
Date: Thu Aug 31 2023 16:39:12 CDT
Attachments:

To whom it may concern,

I am writing this letter in response to the Iowa government's proposal to reorganize and eliminate over 140 Advisory Boards and Commissions. My name is [REDACTED]. I am a second-year student in the Master of Science in Athletic Training program at the University of Iowa. This proposal that was created is working to eliminate the Board of Athletic Training as well as our licensure. For some background information on this healthcare profession, Athletic Training was first recognized as a profession in 1990 by the American Medical Association. Athletic trainers are highly qualified and multi-skilled healthcare professionals who provide services and treatment under the direction of and in collaboration with a physician in accordance with their education, state statutes, rules, and regulations. Over the last 30+ years, athletic trainers have specialized in the prevention, diagnosis, and intervention of emergent, acute, and chronic medical conditions involving impairment, functional limitations, and disabilities. 47 states and the District of Columbia require licensure for athletic trainers. Of the remaining non-licensure states, New York has a licensure bill awaiting the Governor's signature and California has a pending legislation.

The University of Iowa is known for its exceptional programs in healthcare, and the Athletic Training program lives up to that standard of being exceptional. We as students go through extensive science-specific coursework that prepares us to sit for our Board of Certification exam, be licensed to work in health care, and have the lives and well-being of individuals in our hands. I have taken well over 100 credit hours of challenging and demanding courses over the last 4 years. As a student, I have spent time providing healthcare to those in the sports team setting, the clinical setting, and the public safety setting. Outside of the heavy load of coursework that we have to complete, I have spent over 600 hours of my time as a student shadowing athletic trainers and learning how to provide the best high-quality care for a patient to improve their well-being. This is a career that requires time, dedication, learning, and adequate teaching in order to have all of the knowledge to treat patients sufficiently.

Our comprehensive education allows us to recognize and address a wide variety of injuries and illnesses such as concussions, ACL tears, cardiac arrest, strokes, cervical spine injuries, and even the extreme of suicide. We are the first medical professionals to be on the scene of an athlete's injury and stay by their side all the way to their return to play or work. Without the proper education and certification, the lives of individuals of all ages, including adolescents, will be on the line. In the state of Iowa, there are over 1,000 certified athletic trainers, the majority of whom are working over 40 hours a week to provide health care services to individuals.

The Board of Athletic Training is a committee that meets regularly throughout the year to make changes and improvements to the care we are giving individuals. Eliminating the Board of Athletic Training and Licensure is going to affect the health and well-being of the entire population in Iowa. This is a profession that works closely with physicians and other healthcare professionals. This collaboration provides substantial care to patients. The profession of athletic training cannot be done without the proper teachings and training. I urge you to thoroughly consider the importance of this profession and the impact that it has on people's lives and keep the Board of Athletic Training and Licensure.

Sincerely,

A solid black rectangular box used to redact the signature of the author.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Iowa Athletic Training Licensure
Date: Thu Aug 31 2023 16:39:27 CDT
Attachments:

My name is [REDACTED], I am a clinic and outreach Athletic Trainer with University of Iowa Hospitals and Clinics and UI Sports Medicine. I earned my Bachelor's degree and Master of Athletic Training degree from The University of Iowa and am a lifelong resident of the state. I work for a public institution and work directly with and for residents of Iowa City and surrounding communities.

I am reaching out to comment on the proposed changes to committees/boards in our state, particularly the recommended elimination of the Board of Athletic Training. I cannot begin to state how alarming this is for the safety of athletes in this state. Athletic trainers play a vital role in the safety of young athletes playing sports in our state daily. The presence of athletic trainers allows coaches to coach and allows a licensed healthcare provider to prevent, evaluate, treat, and rehabilitate injuries. Additionally, if an emergency occurs, athletic trainers are present to provide the necessary immediate care and activate an emergency action plan/response. Finally, and more specifically, with concussion care being such an important and vital topic, having trained professionals who can diagnose and treat head injuries accurately and effectively is necessary for safe participation in sports.

There are many stories of the importance of athletic trainers, too many for this one email, but I will share a few. [REDACTED], who graduated from Pleasant Valley High School and played football at Iowa, was working out in Bettendorf and collapsed. An athletic trainer's quick and effective response to his cardiac issue is why he is still alive today. Last year, athletic trainers at two different high schools in Iowa accurately diagnosed internal organ damage and saved their athlete's lives. Athletic trainers at a university in Iowa saved the life of a basketball manager during practice a few years ago and saved an athlete from paralysis last year by properly treating a cervical spine injury. I could go on and on with more stories. In each case you needed a licensed healthcare professional there, on site, to have a positive outcome. Having to call medical help or having someone without the right qualifications present could have led to a poor outcome. Athletic trainers are the professionals that are trained to be on site and take care of these injuries.

If the licensing system for athletic trainers was removed, it would be up to the schools who are

hiring athletic trainers determine the viability of an individual to be an athletic trainer. That means the schools and often athletic administrators or coaches who are not trained in healthcare will be charged with determining who is qualified to provide healthcare. While I have respect for athletic administrators and coaches, they are not the best individuals to hire a healthcare provider. Overall, this change hurts the public and makes participation in sport less safe.

Additionally, by removing the licensure system from our state, we would rely only on the Board of Certification (BOC) exam as a way of assessing the quality of an athletic trainer. While this exam is designed to protect the public by screening recent graduates for basic knowledge and skill, a means for our state to monitor athletic trainers and ensure continuing education is necessary for public protection as best practices will naturally evolve over an athletic trainer's career.

The move to eliminate the Board of Athletic Training is a backward movement in comparison to the rest of the country. Across the US, 49/50 states have some form of regulation of the profession athletic training. The one remaining state has an active bill which would require regulation of the practice of athletic training. Licensure is required in 47/50 states. Thus, by moving away from licensing athletic trainers in our state, we would be moving in the opposite direction of everyone else. In this case, being different is not a good thing.

Finally, as a community member, I want kids to be safe when playing in sports. I know injuries will happen, but I expect the school or organization to have the properly trained individuals on site to provide care. Removing the Board of Athletic Training and licensure system takes away an important and effective means to ensure qualified individuals are providing that care.

Thank you for the consideration of these comments and I ask that you reach out to the committee members making this decision and reconsider the elimination of the Board of Athletic Training.

Thank you for taking the time to read this email.

Sincerely,



[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Public Hearing on Boards and Commissions
Date: Thu Aug 31 2023 16:52:20 CDT
Attachments:

Hello, I would like to speak at the public meeting on September 6th if possible on behalf of the Iowa Federation of Labor, AFL-CIO.

--

[REDACTED]
Secretary-Treasurer, Iowa Federation of Labor, AFL-CIO
2000 Walker Street
Des Moines, Iowa 50317
[REDACTED]

From:

[REDACTED]

To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Bcc:

Subject: Hearing Instrument Specialist Deregulation

Date: Thu Aug 31 2023 16:58:59 CDT

Attachments:

I am writing in opposition to the deregulation of licensing for Hearing Instrument specialist in Iowa.

A Hearing Instrument Specialist has a VERY important job making sure the patient with a hearing loss is prescribed the correct hearing aids for their specific hearing loss just like an Optometrist prescribes the correct prescription for a vision loss.

By deregulating Hearing Instrument Specialist this is doing a great injustice for people with a hearing loss that need professional care and service for their hearing loss needs in our great STATE OF IOWA!!!

PLEASE take this in consideration and NOT DEREGULATE HEARING INSTRUMENT SPECIALIST IN IOWA!!!!

Thank you,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Board Merging
Date: Thu Aug 31 2023 17:54:24 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases. Massage therapy is a very different profession and massage therapists have a significantly different responsibility to their clients than a physical/occupational therapist and chiropractor.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Iowa Board of Chiropractic
Date: Thu Aug 31 2023 17:55:16 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to make my public comment that the Iowa Chiropractic Licensure Board should NOT be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the knowledge and expertise on the board to deal with cases with provider specific intricacies.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for the different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

I served on the Iowa Board of Chiropractic and can not think of anything that this proposal would accomplish to better protect and serve the citizens of Iowa. In my opinion, it would be a risk that should not be allowed to come to fruition.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

[REDACTED]

From:

To:

BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Subject:

Hearing Instrument Specialist deregulation

To: Boards and Commissions Review Committee

I am writing in opposition to the deregulation of licensing for Hearing instrument specialist in Iowa. I have been a licensed Hearing instrument specialist for almost 8 years in Iowa. Obtaining a license to dispense hearing instruments is critical to protecting our consumers and future patients. The licensing exam for our profession is designed to prove total competency to be able to safely and effectively work in the hearing industry.

There are many reasons why deregulation of our profession is a bad idea. As a Sr. Hearing Instrument Specialist, I fit prescriptive medical devices that require extensive training and licensing to be able to fit patients properly and effectively. We are trained to discover underlying medical conditions that can be very serious that require intervention of a doctor or ENT. Untrained and unlicensed individuals have no ability to recognize these serious medical issues. If these issues are left untreated could have significant impact to their health.

Deregulation of licensing would open the door for anyone to fit the unknowing and vulnerable, predominantly, senior population. A poorly fit hearing device by an unlicensed/untrained party can cause more damage to an individual's hearing. All prescriptive hearing devices are evaluated and tested by a licensed specialist. The consumer/patient is fit with the proper prescription to their most comfortable level.

There are countless of other reason why deregulation of licensing for Hearing instrument specialist is very poor idea. Please keep the safety of our, mostly senior population, into consideration. This would be impacting the safety of so many Iowan's. Please take this into consideration.

Thank you,

[Redacted signature]

[Redacted signature]



From:

To:

BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Bcc:

Subject: Hearing Instrument Specialist Deregulation

Date: Thu Aug 31 2023 18:09:32 CDT

Attachments:

To whom it may concern:

I am writing in opposition to the deregulation of licensing for Hearing Instrument specialist in Iowa. I am a board-certified hearing instrument specialist and have been licensed in Iowa for 14 years. Deregulating the hearing industry is a horrendous idea for many reasons such as not looking out for the overall health, safety, fit and satisfaction of the hearing impaired. A trained, licensed professional will prescription fit the hearing instrument(s) properly and do the follow up required to insure a positive outcome.

There are many diseases and disorders the outer, middle and inner ear that must be addressed before even considering the fitting of hearing aids. How is an unlicensed and untrained fitter going to be able to handle these situations? Some of these conditions can even be life threatening such as acoustic neuroma. Our ears are one of the most neglected body parts we have. However, untreated hearing loss can lead to more severe disorders like dementia, kidney disease, diabetes, social isolation to name a few.

I know that caring for Iowans is a top priority for you. Government budget cuts should not supersede the proper care all Iowans deserve therefore deregulation should not be considered. Hearing instruments are an important part of a person's life and are invaluable. But, if improperly fit, can be detrimental. I welcome you to come to the Cedar Rapids Miracle-Ear office to see for yourself how the proper testing, fitting, care and standards are well orchestrated. If not properly licensed these standards would not exist.

Thank you,

[Redacted signature block]



From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Public Comment Regarding Recommendation to Eliminate Board of Athletic Training
Date: Thu Aug 31 2023 18:12:13 CDT
Attachments:

Hello -

It has come to my attention from colleagues that the Board and Commissions Review Committee determined yesterday it would be best to 'Eliminate' the Board of Athletic Training in the State of Iowa.

I have lived in Iowa since 2013, primarily in Ankeny where I currently reside. I have earned both of my degrees here in Iowa, from Drake. My Bachelors in Clinical and Applied Health Sciences ('20) and Master's in Athletic Training ('21). I am licensed to practice Athletic Training in the state of Iowa because

- * I graduated from a rigorous, nationally accredited (CAATE) program at Drake and
- * passed a national Board of Certificate exam and
- * possess a master's level degree in athletic training

All of these steps are required and necessary, because an Athletic Trainer has the responsibility and duty to care for their patients. Our patients are often athletes, they are often children and adolescents, and they are constantly exposed to risks, typically due to sport but also life and regular mental health challenges. We are trained to provide critical care for life-threatening injury (head hits, chest trauma, open fractures, occluded airway, life-threatening shock or allergy or asthma, etc.) and that is just in our emergency care training. We are also qualified to diagnose and treat injury, to execute rehabilitation plans following injury or surgery, create comprehensive injury prevention plans for teams, and identify signs of referrable illness, which is very commonly, signs of concern for mental health or patient safety, which can be life threatening. Because of the breadth of our work, it requires we have the highest quality of education and oversight, so our athletes and patients here in Iowa, can stay safe and healthy for years.

If we were to remove this board which oversees our licensing, we would be among the 3 other states who do not require licensure (see link: <https://members.nata.org/gov/state/regulatory-boards/map.cfm>). The reason almost all states regulate at the state level is because when athletic trainers are present, athletes are always safer, allowing sport and subsequently, health, to be the focus and the fun. That is, when the athletic trainers are what we expect (educated, certified, and licensed).

As my colleague [REDACTED] has already addressed to you: Licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.

I ask you, would you consider allowing surgeons, dentists, physical therapists, or nurses to be able to treat you or a loved one without proper education, licensing, and regulation? Why would you allow any less for your athletes and children or communities?

I would be happy to answer any more questions on my profession or come to speak in person.

Thank you for your consideration of public opinion on this matter. I urge you to reconsider the original recommendation to eliminate the Board of Athletic Training in the state of Iowa.

Kindly,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Deregulation of heating specialist
Date: Thu Aug 31 2023 18:13:20 CDT
Attachments:

The major dispensaries of hearing aids require licensed specialists
To treat patients with hearing loss..miracle ear hearing centers give back to all communities
By fitting at no charge hearing impaired population that cannot afford aids..
This organization hosts massive mission events fitting hundreds of needy patients.
This is done by licensed skilled passionate, professionals..
Please reconsider your direction.

[REDACTED]
Sent from my iPad

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Board of Hearing Aid Specialists
Date: Thu Aug 31 2023 18:18:21 CDT
Attachments:

Good afternoon,

I am writing you today to strongly oppose the proposition of eliminating the Board of Hearing Aid Specialists.

This bill will do nothing but cause more problems for Iowans with hearing loss and hearing aids. Removing licensed, certified specialists will make it harder if not impossible for people to find TRUSTED and knowing specialists.

People will purchase hearing aids in bulk and sell to unsuspecting individuals who then have no way to have them adjusted like they need to be, as they are by PERSCRIPTION. Let alone, return the hearing aids if there is a problem.

Would you allow an unlicensed, uncertified individual to sell prescription drugs out of their home?

This decision is dangerous and will only harm the people that live in this state.

I urge you to reconsider.

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Iowa Athletic Training Licensure
Date: Thu Aug 31 2023 18:54:28 CDT
Attachments:

Hello,

I am writing to you today to stress to importance of our state's regulation of Athletic Training licensure.

Athletic Trainers are health care professionals and have really shown our worth in the past few years. We provide emergency care, rehabilitation, help with diagnosis, and other key parts to athletes and patients care within orthopedics/sports medicine.

Most of us have 6-year degrees and all of us have a national certification.

We need to be promoting our profession and holding it to a higher standard. There are many orthopedic surgeons and primary care providers that would agree with us. They see us as a front line of care for many patients.

Not just anyone can become an Athletic Trainer. This is why we need continuing licensure in the state.

There are countless stories of how we have saved lives during sporting events. High school and middle school athletes depend on us being there as an advocate for them.

I hope you can see the importance of our license in this state. I am happy to give you further information if needed.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: The Importance of Athletic Trainers
Date: Thu Aug 31 2023 19:19:35 CDT
Attachments:

Greetings the Boards and Commissions Review Committee,

My name is [REDACTED] and I am currently attending the University of Iowa's Master of Athletic Training program. The elimination of the Board of Athletic Training as well as the elimination of Athletic Training Licensure will not be good for all parties involved. Athletic trainers are important members of health care and are integral to helping people within all walks of life. Athletic trainers are vital in emergent care situations, rehabilitation, and injury/illness prevention. Throughout the United States of America, only three states do not currently have full state licensure for Athletic Trainers. These states include New York, California, and Hawaii. It is important that as a state, we choose to go forward towards complete licensure versus moving backwards. New York and California are even taking steps to become further regulated. Do we really want Iowa to be what California was and still is at this moment in not having state licensure.

What is key is that athletic trainers help to provide care to a range of patients. We work with grandmothers needing to rehab from a surgery. We work with the high school quarterback recovering from a twisted ankle. We work with the factory worker that has a chronic carpal tunnel. We work with them all and if we aren't licensed, the standard of care provided would decrease and become worse as a result. Thank you for your time and vote against the elimination of the Board of Athletic Training and vote against the Elimination of State Licensure.

Sincerely,

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: ATC license
Date: Thu Aug 31 2023 19:27:50 CDT
Attachments:

To Whom It May Concern,

I understand that the committee would like to change the license requirement for Athletic Trainers. I believe that this done in poor judgement, and should not move forward.

ATC's are medical professionals that require intense training through an accredited program. These are the people that will treat athletes while still going to class and doing homework. They are the first line of medical help during sporting events, and the most trusted and consistent medical provider athletes will see in their lives.

If this is taken away, you will see an increase in athletes receiving sub par care from "medical professionals" claiming to be athletic trainers. There will be no regulation for those on the sidelines claiming to be an athletic trainer. Is that the person you want treating an athlete for a concussion? Or a cardiac event?

What are you will to sacrifice to take away the license requirements for an ATC? I hope you're prepared for student athletes health to suffer.

You are doing this profession a disservice if this moves forward.

With frustration,

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Proposed elimination of athletic training license and board
Date: Thu Aug 31 2023 19:28:25 CDT
Attachments:

To whom it may concern.

I am writing to comment on the proposal to eliminate the athletic training professional license and its board as part of the overhaul and state licenses and boards in the upcoming this coming year. I would argue that elimination of the athletic training license and board is short-sighted and increases the danger to the public, particularly athletes in the high school and university settings across Iowa. As one of the 1,129 licensed athletic trainers in Iowa, I can personally attest for the importance of the license from the perspective of what it was like before the license, when there was no scope of practice guidance and anyone with no training could claim to be an athletic trainer. Our license protects the public and lets our clients and employers know we are properly trained. We specialize in prevention, diagnosis, and intervention of emergent, acute, and chronic medical conditions involving impairment, functional limitations, and disabilities. We reach into underserved rural areas of our state. As a long-serving athletic trainer at a rural high school, there were many times I was the only professional on the football field to serve both teams with concussion management skills, which is required by Iowa law. In addition to athletics, we serve all types of patients, from the armed forces and public safety to the performing arts,

Eliminating licensure in Iowa could potentially impact an athletic trainer's ability to practice across state lines, depending on regulatory requirements in other states. Every state, with the exception of California (where legislation is pending) and Washington DC require licensure for athletic trainers. Licensure provides the highest level of patient protection for the public's safety, and is the standard form of regulation for health care professions. Athletic trainers have National Provider Numbers by the U.S. Department of Health and Human Services, and are recognized as an allied health profession by the American Medical Association. In addition, the Board of Athletic Training in the state of Iowa is completely funded by athletic trainer licensure fees, with no lost revenue.

I thank you for reading my comments, and I hope you will reconsider this proposed elimination of the athletic training license.

Sincerely,

[REDACTED]

From:

To:

bcrccomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Subject:

Board merger concerns

Dear Board and Commission Review Committee,

I reaching out to you to voice my professional opinion that the Iowa Chiropractic Licensure Board should not be combined and/or merged with any other boards. This would create many issues, some of which could affect public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for your consideration. My colleagues and I ask for you not to support merging and/or combining the Iowa Chiropractic Licensure Board with any other boards.

Sincerely,

[Redacted signature]

From: [REDACTED]
[REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Expressing Opinion on Elimination of Athletic Training
Date: Thu Aug 31 2023 19:56:58 CDT
Attachments:

Senator Weiner,

I am writing to voice my opposition to the elimination of the Board of Athletic Training and licensure of athletic trainers in Iowa. This is very detrimental to not just the profession, but to the thousands of patients who athletic trainers care for every day in our state. Elimination of licensure would lead to danger and safety issues for all of our physically active patients, but especially our youth athletes.

In 2018, Athletic Trainers were the driving force behind passage of HF2442, which set standards for concussion management in youth sports. Athletic Trainers are the primary licensed health care providers on the sidelines for all of Iowa's high school football games and other interscholastic sporting events. Removing AT's licensure would conflict with current Iowa code in this area and cause unresolvable problems for high schools trying to protect their students.

California is the only other state without regulation for athletic trainers, and I don't want to see Iowa compared to that state as the only two states who allow delinquent health care professionals to come practice and place our residents in danger.

Licensure provides the highest level of patient protection, and it is the gold standard of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.

Eliminating licensure in Iowa could potentially impact an AT's ability to practice across state lines (travel with their team), depending on regulatory requirements in other states. (ex. some

states allow you to practice in their state temporarily, provided your home state maintains the same regulatory requirements).

Sincerely,

A solid black rectangular box used to redact a signature.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic Trainer Licensure
Date: Thu Aug 31 2023 19:57:25 CDT
Attachments:

Senator Weiner,

I am writing to voice my opposition to the elimination of the Board of Athletic Training and licensure of athletic trainers in Iowa. This is very detrimental to not just the profession, but to the thousands of patients who athletic trainers care for every day in our state. Elimination of licensure would lead to danger and safety issues for all of our physically active patients, but especially our youth athletes.

In 2018, Athletic Trainers were the driving force behind passage of HF2442, which set standards for concussion management in youth sports. Athletic Trainers are the primary licensed health care providers on the sidelines for all of Iowa's high school football games and other interscholastic sporting events. Removing AT's licensure would conflict with current Iowa code in this area and cause unresolvable problems for high schools trying to protect their students.

California is the only other state without regulation for athletic trainers, and I don't want to see Iowa compared to that state as the only two states who allow delinquent health care professionals to come practice and place our residents in danger.

Licensure provides the highest level of patient protection, and it is the gold standard of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.

Eliminating licensure in Iowa could potentially impact an AT's ability to practice across state lines (travel with their team), depending on regulatory requirements in other states. (ex. some states allow you to practice in their state temporarily, provided your home state maintains the same regulatory requirements).

I am a coxswain on the University of Iowa D1 Rowing Team and my athletic trainer has had significant impacts on the success of my college career. I am eternally grateful for her knowledge and all that she has done for me and my team. The extensive training that she has gone through to get to her position today is extremely important and must not go unnoticed.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic Training Licensure
Date: Thu Aug 31 2023 20:00:29 CDT
Attachments:

I am writing to voice my opposition to the elimination of the Board of Athletic Training and licensure of athletic trainers in Iowa. This is very detrimental to not just the profession, but to the thousands of patients who athletic trainers care for every day in our state. Elimination of licensure would lead to danger and safety issues for all of our physically active patients, but especially our youth athletes.

In 2018, Athletic Trainers were the driving force behind passage of HF2442, which set standards for concussion management in youth sports. Athletic Trainers are the primary licensed health care providers on the sidelines for all of Iowa's high school football games and other interscholastic sporting events. Removing AT's licensure would conflict with current Iowa code in this area and cause unresolvable problems for high schools trying to protect their students.

California is the only other state without regulation for athletic trainers, and I don't want to see Iowa compared to that state as the only two states who allow delinquent health care professionals to come practice and place our residents in danger.

Licensure provides the highest level of patient protection, and it is the gold standard of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.

Eliminating licensure in Iowa could potentially impact an AT's ability to practice across state lines (travel with their team), depending on regulatory requirements in other states. (ex. some states allow you to practice in their state temporarily, provided your home state maintains the same regulatory requirements).

[REDACTED]

From: [REDACTED]
[REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Elimination of the Board of Athletic Training of Athletic Trainers in Iowa
Date: Thu Aug 31 2023 20:00:43 CDT
Attachments:

Senator Weiner,

I am writing to voice my opposition to the elimination of the Board of Athletic Training and licensure of athletic trainers in Iowa. This is very detrimental to not just the profession, but to the thousands of patients who athletic trainers care for every day in our state. Elimination of licensure would lead to danger and safety issues for all of our physically active patients, but especially our youth athletes.

I am a student athlete at the University of Iowa and the athletic trainer for my team has been the biggest support system for me. Personally suffering several injuries, I have never had to worry about having someone to look out for me and advocate for my needs. She made sure that I was taken care of over the summer, even though I was halfway across the country and she never hesitates to do what is best for me and my teammates. She deserves the credit that she has worked hard to earn and practices with each of us every day.

In 2018, Athletic Trainers were the driving force behind passage of HF2442, which set standards for concussion management in youth sports. Athletic Trainers are the primary licensed health care providers on the sidelines for all of Iowa's high school football games and other interscholastic sporting events. Removing AT's licensure would conflict with current Iowa code in this area and cause unresolvable problems for high schools trying to protect their students.

California is the only other state without regulation for athletic trainers, and I don't want to see Iowa compared to that state as the only two states who allow delinquent health care professionals to come practice and place our residents in danger.

Licensure provides the highest level of patient protection, and it is the gold standard of

regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.

Eliminating licensure in Iowa could potentially impact an AT's ability to practice across state lines (travel with their team), depending on regulatory requirements in other states. (ex. some states allow you to practice in their state temporarily, provided your home state maintains the same regulatory requirements).

Sincerely,



From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic Training Licensure
Date: Thu Aug 31 2023 20:09:53 CDT
Attachments:

Senator Weiner,

I am writing to you as a Division I athlete at the University of Iowa and previous high school athlete who has been blessed to have had excellent athletic trainers who have helped me with multiple injuries throughout the years. With that being said, I am very opposed to the elimination of the Board of Athletic Training and licensure of athletic trainers in Iowa. Not only would this pose a significant safety issue going forward, but it also negates the rigorous school and training of the athletic trainers in Iowa. It is that rigorous training that gives athletes like me access to high quality trainers, not only in my collegiate career but in my youth as well.

This decision would directly impact on myself, my teammates, and all athletes at the University of Iowa and other sports programs across the state. Eliminating licensure in Iowa could potentially impact an AT's ability to practice across state lines (travel with their team), depending on regulatory requirements in other states. (ex. some states allow you to practice in their state temporarily, provided your home state maintains the same regulatory requirements).

California is the only other state without regulation for athletic trainers, and I don't want to see Iowa compared to that state as the only two states who allow delinquent health care professionals to come practice and place our residents in danger.

There is a reason for licensure, and it should not be forgotten. It constitutes that the person providing care for these athletes is well versed in the field while also providing the highest level of patient protection. Additionally, it is the gold standard of regulation for health care professionals. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.

Please make safety your priority,

[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Plumbing and Mechanical Systems Brd
Date: Thu Aug 31 2023 20:13:47 CDT
Attachments:

To whom it may concern,

Thank for you for the opportunity to share my thoughts on these proposed changes. I'm in agreement with Governor Reynolds that all the boards of the State of Iowa need to be reviewed and either eliminated or consolidated.

As an HVAC service technician and mechanical contractor for over 24 years I've spent hundreds of hours and thousands of dollars on continuing education and licensing. The current setup is for a license renewal every 3 years. I'd really like to see that increased to 7 years with an elimination of the continuing education piece. I see no need or benefit to the current set up.

Thank you for your time,

[REDACTED]

Sent from Yahoo Mail for iPhone

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic Training Licensure
Date: Thu Aug 31 2023 20:14:32 CDT
Attachments:

Senator Weiner,

I am writing to voice my opposition to the elimination of the Board of Athletic Training and licensure of athletic trainers in Iowa. This is very detrimental to not just the profession, but to the thousands of patients who athletic trainers care for every day in our state. Elimination of licensure would lead to danger and safety issues for all of our physically active patients, but especially our youth athletes.

In 2018, Athletic Trainers were the driving force behind passage of HF2442, which set standards for concussion management in youth sports. Athletic Trainers are the primary licensed health care providers on the sidelines for all of Iowa's high school football games and other interscholastic sporting events. Removing AT's licensure would conflict with current Iowa code in this area and cause unresolvable problems for high schools trying to protect their students.

California is the only other state without regulation for athletic trainers, and I don't want to see Iowa compared to that state as the only two states who allow delinquent health care professionals to come practice and place our residents in danger.

Licensure provides the highest level of patient protection, and it is the gold standard of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.

Eliminating licensure in Iowa could potentially impact an AT's ability to practice across state lines (travel with their team), depending on regulatory requirements in other states. (ex. some states allow you to practice in their state temporarily, provided your home state maintains the same regulatory requirements).

Thank you,
[REDACTED]

From: [REDACTED]
[REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Chiropractic Licensure Board
Date: Thu Aug 31 2023 20:20:42 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * Creating a safety issue by combining and diluting the expertise on the board knowledge to deal with cases. Chiropractic, massage, and physiotherapy do different things thus they all should have different boards.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions.
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. I ask for your reconsideration to not merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Opposition Against the Elimination of AT Licensure
Date: Thu Aug 31 2023 20:40:50 CDT
Attachments:

To whom it may concern,

I am writing to voice my opposition to the elimination of the Board of Athletic Training and licensure of athletic trainers in Iowa. This is very detrimental to not just the profession, but to the thousands of patients who athletic trainers care for every day in our state. Elimination of licensure would lead to danger and safety issues for all our physically active patients, but especially our youth athletes.

As a current student-athlete at the University of Iowa, I think that it is only right that I have a voice in this matter. I am a current junior at the University of Iowa on the rowing team. I have gone through a major injury since being here on campus and there is no way I would have been able to recover the way I did without my athletic trainer and the specialties she has. By taking away licensures for Athletic Trainers, especially in youth sports, there are going to be more injuries that are not taken care of in the best way for the patient. Without the care as a youth athlete, many will not live out their big dreams of playing because of youth injuries not taken care of properly.

In 2018, Athletic Trainers were the driving force behind passage of HF2442, which set standards for concussion management in youth sports. Athletic Trainers are the primary licensed health care providers on the sidelines for all of Iowa's high school football games and other interscholastic sporting events. Removing AT's licensure would conflict with the current Iowa code in this area and cause unresolvable problems for high schools trying to protect their students.

California is the only other state without regulation for athletic trainers, and I don't want to see Iowa compared to that state as the only two states who allow delinquent health care professionals to come practice and place our residents in danger.

Licensure supplies the highest level of patient protection, and it is the gold standard of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS) and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.

Eliminating licensure in Iowa could potentially impact an AT's ability to practice across state lines (travel with their team), depending on regulatory requirements in other states. (ex. some states allow you to practice in their state temporarily, provided your home state maintains the

same regulatory requirements).

Thank you for your time and consideration

[REDACTED]

[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc: [REDACTED]
Subject: Iowa Chiropractic Licensure Board Reorganization & Merger
[REDACTED]

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

[REDACTED]

From: [REDACTED]
[REDACTED]
[REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Opposition to the elimination of the Board of Athletic training and licensure of athletic trainers in Iowa
Date: Thu Aug 31 2023 21:10:06 CDT
Attachments:

Hello,

I am writing to voice my opposition to the elimination of the Board of Athletic Training and licensure of athletic trainers in Iowa. This is very detrimental to not just the profession, but to the thousands of patients who athletic trainers care for every day in our state. Elimination of licensure would lead to danger and safety issues for all of our physically active patients, but especially our youth athletes.

In 2018, Athletic Trainers were the driving force behind passage of HF2442, which set standards for concussion management in youth sports. Athletic Trainers are the primary licensed health care providers on the sidelines for all of Iowa's high school football games and other interscholastic sporting events. Removing AT's licensure would conflict with current Iowa code in this area and cause unresolvable problems for high schools trying to protect their students.

California is the only other state without regulation for athletic trainers, and I don't want to see Iowa compared to that state as the only two states who allow delinquent health care professionals to come practice and place our residents in danger.

Licensure provides the highest level of patient protection, and it is the gold standard of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.

Eliminating licensure in Iowa could potentially impact an AT's ability to practice across state lines (travel with their team), depending on regulatory requirements in other states. (ex. some states allow you to practice in their state temporarily, provided your home state maintains the same regulatory requirements).

As a current student athlete, I am incredibly concerned about this issue. The protection of my teammates health and my own is not something that should be put in the hands of an unlicensed individual. Young athletes without any idea of their medical rights, or without the ability to know what is right and wrong, should never be put in this dangerous of a position. Supporting this would be putting the lives of thousands children at risk each and every single day. I, and many many others passionately oppose this elimination and hope to have our voices heard.

Thank you for the consideration.

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Retain the Midwifery Advisory Board
Date: Thu Aug 31 2023 21:10:46 CDT
Attachments:

To whom it may concern:

Please retain the Midwifery Advisory Council to ensure the most qualified lowans are advising on issues impacting the non-nurse midwifery workforce and to reduce barriers to entry into the Certified Professional Midwife workforce, which is positioned to see an increase in the state once licensure is available in July 2024.

The Midwifery Advisory Council (MAC) was created when HF 265 was signed into law on June 1, 2023 and is listed on the preliminary recommendations for elimination. The MAC would advise the Board of Nursing on matters related to midwifery. This is necessary because Certified Professional Midwives (CPMs) are not nurses. Creating the MAC was a compromise to avoid creating an entirely new board to save the state money and ensure a reasonable licensing fee for CPMs. Having a different profession, in this case nurses, set CPM rules creates barriers for the CPM workforce and is contrary to the goals of the Boards and Commissions Review Committee goals and recommendations.

HF 265 was passed with overwhelming bipartisan support by the Senate 46-2 and House 91-2. The bill provides licensure for Certified Professional Midwives, increasing access to quality maternal health care providers, which are desperately needed in Iowa. Licensure is necessary for CPMs to obtain the life saving medications within their training and scope of practice.

Sincerely,
[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Iowa Chiropractic Board
Date: Thu Aug 31 2023 21:38:33 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should NOT be combined and merged with any other boards. Chiropractic is a distinct and unique profession and is not similar enough to other proposed professions to be merged with them. I fear that lumping these professions together will create confusion and water down the strength and integrity of the board. I believe that to safeguard the public Chiropractic CAN ONLY BE judged and regulated by Chiropractors educated in an accredited Chiropractic College and who have practiced the profession of Chiropractic.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,
[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Midwifery Advisory Council
Date: Thu Aug 31 2023 22:03:25 CDT
Attachments:

The Midwifery Advisory Council (MAC) was created when HF 265 was signed into law on June 1, 2023 and is listed on the preliminary recommendations for elimination. The MAC would advise the Board of Nursing on matters related to midwifery. This is necessary because Certified Professional Midwives (CPMs) are not nurses. Creating the MAC was a compromise to avoid creating an entirely new board to save the state money and ensure a reasonable licensing fee for CPMs. Having a different profession, in this case nurses, set CPM rules creates barriers for the CPM workforce and is contrary to the goals of the Boards and Commissions Review Committee goals and recommendations.

HF 265 was passed with overwhelming bipartisan support by the Senate 46-2 and House 91-2. The bill provides licensure for Certified Professional Midwives, increasing access to quality maternal health care providers, which are desperately needed in Iowa. Licensure is necessary for CPMs to obtain the life saving medications within their training and scope of practice. Please retain the Midwifery Advisory Council to ensure the most qualified Iowans are advising on issues impacting the non-nurse midwifery workforce and to reduce barriers to entry into the Certified Professional Midwife workforce, which is positioned to see an increase in the state once licensure is available in July 2024.

Sincerely,

The International Cesarean Awareness Network, Inc. (ICAN) is a nonprofit organization whose mission is to improve maternal-child health by reducing preventable cesareans through education, supporting cesarean recovery, and advocating for vaginal birth after cesarean (VBAC).

The information contained in or provided via email is intended for general consumer understanding and education only, it is not intended to be, and is not provided as a substitute for professional medical advice. Nothing contained in or provided via email is intended to be or is to be used for medical diagnosis or treatment. Always seek the advice of a qualified health care provider before you undergo any treatment or for answers to any questions you may have regarding a medical condition. ICAN does not warrant or guarantee the accuracy, completeness, correctness, timeliness, or usefulness of any information provided via email. In no event will ICAN be liable to you or anyone else for any decision made or action taken by you or anyone else in reliance upon the information contained on or provided via email.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic Trainer Licensure
Date: Thu Aug 31 2023 22:25:21 CDT
Attachments:

Senator Weiner,

I am writing to voice my opposition to the elimination of the Board of Athletic Training and licensure of athletic trainers in Iowa. This is very detrimental to not just the profession, but to the thousands of patients who athletic trainers care for every day in our state. Elimination of licensure would lead to danger and safety issues for all of our physically active patients, but especially our youth athletes.

In 2018, Athletic Trainers were the driving force behind passage of HF2442, which set standards for concussion management in youth sports. Athletic Trainers are the primary licensed health care providers on the sidelines for all of Iowa's high school football games and other interscholastic sporting events. Removing AT's licensure would conflict with current Iowa code in this area and cause unresolvable problems for high schools trying to protect their students.

California is the only other state without regulation for athletic trainers, and I don't want to see Iowa compared to that state as the only two states who allow delinquent health care professionals to come practice and place our residents in danger.

Licensure provides the highest level of patient protection, and it is the gold standard of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.

Eliminating licensure in Iowa could potentially impact an AT's ability to practice across state lines (travel with their team), depending on regulatory requirements in other states. (ex. some

states allow you to practice in their state temporarily, provided your home state maintains the same regulatory requirements).

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc: [REDACTED]
Bcc: [REDACTED]
Subject: REQUESTED ACTION: Opposition to Elimination of Iowa Board of Athletic Training
Date: Thu Aug 31 2023 23:46:01 CDT
Attachments: image001.png
image002.png
image003.png
image004.png
image005.png
image006.png
image007.png
image008.png

Dear Members of the Boards and Commissions Review Committee,

I hope this email finds you well. My name is [REDACTED], and I am a Licensed Athletic Trainer in the State of Illinois, working for the largest employer of Athletic Trainers in the country, Athletico. I am currently responsible for the oversight of our team of over 350 Athletic Trainers, with 50 of those 350 teammates residing and practicing in Iowa. I am writing to express my deep concern and strong opposition to the recent consideration of eliminating the Iowa Board of Athletic Training.

The Athletic Training profession is composed of Certified and Licensed Athletic Trainers from professional, collegiate, and high school teams; industries; physician offices; rehabilitation clinics; and every branch of the United State military working together to promote and practice the profession of Athletic Training within the State of Iowa. Athletic Trainers have a long history of providing quality health care for athletes and persons engaged in regular physical activity. They are highly skilled licensed health care professionals who specialize in immediate, acute, and emergency care, examination, assessment, injury prevention, risk management, therapeutic intervention and rehabilitation of injury and illness. We are included under the allied

health professions category, as defined by the U.S. Department of Health and Human Services (HHS) & also carry National Provider Identifier numbers (NPIs). Lastly, the American Medical Association (AMA) also recognizes Athletic Trainers as an allied health care profession.

The National Athletic Trainers' Association (NATA) represents and supports more than 45,000 members of the Athletic Training profession, including more than 1129 licensed Athletic Trainers in the State of Iowa. Licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for health care professions. It also ensures clients and employers that an Athletic Trainer is properly trained, taking continuing education, and monitored. The associated Board of Athletic Training helps provide scope of practice guidance & protects the public from untrained persons. There is no expense associated with this Board. The fees that Athletic Trainers pay to renew their license cover all costs and year over year they are consistently in the black.

By eliminating the Board of Athletic Training and subsequent licensing for Athletic Trainers, we risk losing a dedicated group of professionals who are uniquely qualified to address the specialized needs of athletes and active individuals. Their knowledge in injury prevention, emergency response, and rehabilitation techniques is invaluable in safeguarding the health of those who rely on their expertise.

I urge this committee to reconsider this proposal and recognize the indispensable contributions that Athletic Trainers make to the communities of Iowa. Their skills and training are essential components of a comprehensive healthcare system that prioritizes the physical well-being of its citizens.

In conclusion, I stand firmly against the elimination of the Iowa Board of Athletic Training and implore the Board to continue supporting this critical profession. Let us work together to ensure that athletes and active individuals throughout the state continue to receive the highest standard of care.

Respectfully,

[Redacted signature]

[Redacted signature]

[REDACTED]

[REDACTED]

This message may contain information that is confidential, privileged, or otherwise protected from disclosure. If this message contains Protected Health Information, its acquisition, transmission, storage and use is protected by HIPAA. If you are not the intended recipient, any review, disclosure, copying, or distribution, of this material is strictly prohibited. If you receive this message in error or are not the named recipient(s), please contact the sender immediately and delete this message. Thank you for your cooperation.

Owner:

[REDACTED]

Filename: image001.png

Last Modified: Thu Aug 31 23:46:01 CDT 2023

image001.png for Print
Item: 174 (Attachment
8)

ATHLETICO
PHYSICAL THERAPY

Page 272 of 1221

Owner:

[REDACTED]

Filename: image002.png

Last Modified: Thu Aug 31 23:46:01 CDT 2023

Owner:

[REDACTED]

Filename: image003.png

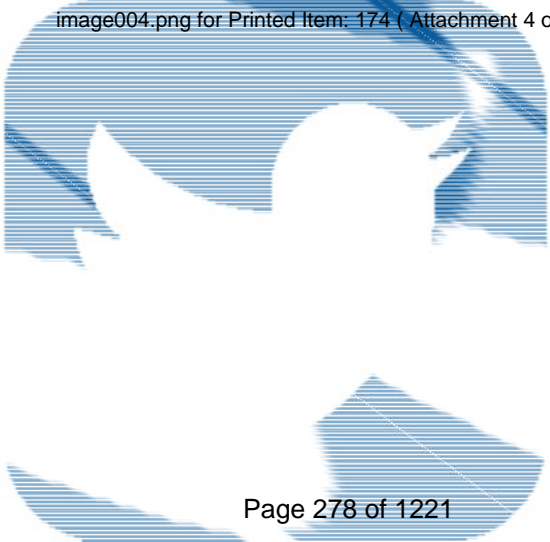
Last Modified: Thu Aug 31 23:46:01 CDT 2023

Owner:

[REDACTED]

Filename: image004.png

Last Modified: Thu Aug 31 23:46:01 CDT 2023



Owner:

[REDACTED]

Filename: image005.png

Last Modified: Thu Aug 31 23:46:01 CDT 2023

YOU Tube

Owner:

[REDACTED]

Filename: image006.png

Last Modified: Thu Aug 31 23:46:01 CDT 2023

Owner:

[REDACTED]

Filename: image007.png

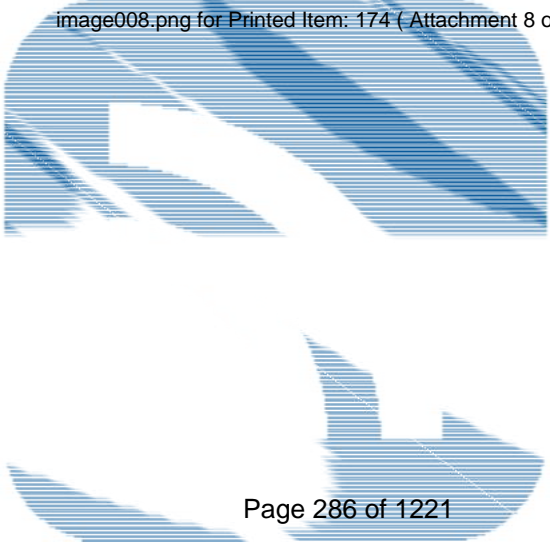
Last Modified: Thu Aug 31 23:46:01 CDT 2023

Owner:

[REDACTED]

Filename: image008.png

Last Modified: Thu Aug 31 23:46:01 CDT 2023



From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: licensure of Athletic Trainers
Date: Fri Sep 01 2023 06:45:02 CDT
Attachments: image001.png

Boards and Commissions Review Committee,

I'm writing to alert you to the critical need to maintain the Board of Athletic Training and licensure for athletic trainers in the state of Iowa. I work at the University of Iowa Hospitals and Clinics and previously with the University of Iowa wrestling team. Many athletic trainers work within our hospital with patients every day, side by side with our nurses and physicians. Many also provide services at community high school and sporting events. Just this past weekend two lives were possibly saved by the quick actions of our staff to treat heat stroke during Friday night high school football games. There are many other health care tasks that athletic trainers perform such as evaluation and rehabilitation of patients' injuries, but these are not actions that should go unregulated. The educational preparation (minimum of a master's degree) and oversight of the ethical, professional background of people who treat patients is very important. In the sports world there have been too many cases of abuse and poor outcomes by physicians and coaches of the past to allow our state to regress in our regulation of professional activities of those involved in the sporting world.

The move to eliminate the Board of Athletic Training is a backward movement in comparison to the rest of the country. Across the US, 49 of 50 states have some form of regulation of the profession athletic training. The one remaining state has an active bill which would require regulation of the practice of athletic training. Licensure is required in 47 of 50 states. Thus, by moving away from licensing athletic trainers in our state, we would be moving in the opposite direction of everyone else in the country.

Licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.

Thanks for allowing me to comment and remember, it would be foolish to abandon the very important role of the Board of Athletic Training and licensure for athletic trainers in the State of Iowa.

Sincerely,

[Redacted signature block]

Owner:

[REDACTED]

Filename: image001.png

Last Modified: Fri Sep 01 06:45:02 CDT 2023

image001.png for Printed Item: 183 (Attachment 1 of 1)

Page 290 of 1221

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Licensure
Date: Fri Sep 01 2023 06:49:44 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.
- * Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: CHIROPRACTIC Licensing board
Date: Fri Sep 01 2023 06:56:30 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: DO NOT Merge Chiropractic and other boards
Date: Fri Sep 01 2023 07:08:40 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

From:

[REDACTED]

To:

bcrccomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

[REDACTED]

Subject:

Boards and Commissions Review Committee

[REDACTED]

[REDACTED]

To whom it may concern:

I oppose the elimination of the Board of Athletic Training and the possible elimination of the licensure of athletic trainers in the state of Iowa. Athletic trainers are integral to the practice of medicine and orthopedics at the University of Iowa as well as across the state. This gross disregard for their licensure will ensure even longer wait times, and sub-standard care of athletic injuries across our state.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Iowa Chiropractic Licensure Board
Date: Fri Sep 01 2023 07:29:28 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Chiropractic issues
Date: Fri Sep 01 2023 07:36:40 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

Sent from my iPad

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Retain the Midwifery Advisory Council
Date: Fri Sep 01 2023 08:00:00 CDT
Attachments:

The Midwifery Advisory Council (MAC) was created when HF 265 was signed into law on June 1, 2023 and is listed on the preliminary recommendations for elimination. The MAC would advise the Board of Nursing on matters related to midwifery. This is necessary because Certified Professional Midwives (CPMs) are not nurses. Creating the MAC was a compromise to avoid creating an entirely new board to save the state money and ensure a reasonable licensing fee for CPMs. Having a different profession, in this case nurses, set CPM rules creates barriers for the CPM workforce and is contrary to the goals of the Boards and Commissions Review Committee goals and recommendations.

HF 265 was passed with overwhelming bipartisan support by the Senate 46-2 and House 91-2. The bill provides licensure for Certified Professional Midwives, increasing access to quality maternal health care providers, which are desperately needed in Iowa. Licensure is necessary for CPMs to obtain the life saving medications within their training and scope of practice. Please retain the Midwifery Advisory Council to ensure the most qualified lowans are advising on issues impacting the non-nurse midwifery workforce and to reduce barriers to entry into the Certified Professional Midwife workforce, which is positioned to see an increase in the state once licensure is available in July 2024.

Sincerely,

[REDACTED]

From:

[REDACTED]

To: BCRCComments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Bcc:

Subject: Deregulating Hearing Specialists

Date: Fri Sep 01 2023 08:01:37 CDT

Attachments:

Having working in the medical field most of my life, I cannot imagine why anyone would think of deregulating hearing specialists. For the safety of Iowans, I urge you to reconsider this.

- Eliminating the Board will compromise patient safety, satisfaction, and access.
- The U.S. Food and Drug Administration's recent regulatory changes necessitate preserving the Board, not eliminating it. This is because the FDA reclassified non-OTC hearing aids as "prescription medical devices" that may only be dispensed upon a prescription or other order from a state-licensed practitioner, including hearing aid

specialists. Eliminating the Board will result in the loss of licensure for every hearing aid specialist practitioner. This will effectively prevent hearing aid specialists from being able to assist Iowans obtain the hearing care they need, drastically reducing patient access across the state. Thus, any belief that the Board may somehow now be unnecessary considering the FDA's recent regulatory changes would be deeply mistaken.

- The proposed elimination of the Board would effectively force Iowans to seek hearing care from unregulated providers, many of whom should be expected to be fly-by-the-night online hearing aid companies that employ unscrupulous tactics to prey on consumers that need the help of a regulated medical profession such as hearing aid specialists.
- Eliminating the Board, and thus licensure of hearing aid specialists, will result in the closure of many small, family-owned clinics that provide good, paying jobs in your communities.

[REDACTED]

“A satisfied customer is the best business plan of all”

Michael LeBoeuf

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Deregulation of licensing of hearing instrument specialists
Date: Fri Sep 01 2023 08:07:36 CDT
Attachments:

I am writing in opposition of the deregulation of licensing of hearing instrument specialists
There are many reasons why this is a terrible idea.
Most importantly being licensed and fully trained to for hearing instruments we are trained
recognize underlying life saving medical conditions that would otherwise go untreated.
We are also fully trained to give our patients the best prescribed outcome with hearing
instruments to prevent a one size fits all experience which results in unsatisfactory outcomes
and then prevents them from getting the proper help they need and deserve.

Sent from my iPhone

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject:
Date: Fri Sep 01 2023 08:13:16 CDT
Attachments:

Dear Board and Commission Review Committee,
This email is in response to a proposed move to combine the Iowa Chiropractic Licensure Board with other un-related boards. This proposal would have dire consequences for the citizens of Iowa.

The change would, to say the least, make it difficult for board members who already sacrifice time away from their respective practices, to serve on said board. These are dedicated volunteers who are serving their profession and the state of Iowa.

From a public safety standpoint, this un-tested and ill conceived suggestion would water down the knowledge and expertise to hear cases that come before them.

Finally, doing what's suggested will hamper getting investigations under way in a timely manner so as to protect our profession and patients.

Thank you for studying this proposal and questioning those who will be most affected by this plan. Please reconsider your plan to merge the Iowa Chiropractic Licensure Board with any other boards.

Sincerely,
[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<brcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Hearing Instrument Specialist deregulation
Date: Fri Sep 01 2023 08:16:34 CDT
Attachments:

I am writing in opposition to the deregulation of licensing for Hearing Instrument Specialists in Iowa.

I am a Patient Care Coordinator and have been working with people with a hearing loss for over 20 years.

One of the major problems I see with deregulating this profession is that people will not know who they are dealing with when they reach out for help.

Has this person any idea of what to look for when they test the hearing or even look in the person's ears prior to testing? How long have they been "in the business".

I have worked with many consultants, and I know of cases where lives were saved. I am not exaggerating, based on test results people were referred to a doctor and in two cases brain tumors were discovered. How will that still happen when anyone can open an office to sell aids without having gone through the licensing procedure?

Ask yourself, would you buy glasses from someone other than a licensed optician?, give birth helped by your someone who has always just wanted to work with babies instead of an OBGYN or trained Midwife? We laugh at people who google symptoms online instead of going to a doctor but with deregulating this profession you are asking people to do just that, not to get a trained licensed professional to diagnose their condition but to leave it up to someone who thinks this might be a good way to earn money.

The hearing instrument specialist is just that, a specialist. They have been trained in what to look for, they have been trained to test and know when something is other than a simple hearing loss and needs to be looked at by an ENT. How can someone who is untrained know what to look for and when to medically refer someone? I feel that deregulating this profession could lead not only to people having serious conditions ignored but also the elderly falling prey to people who are in it only to make money. With more and more studies being released connecting Alzheimers with hearing loss would you not think that having the best trained professionals doing this job is essential to the well-being of all?

Before deciding to de-regulate I would humbly ask that you look at the licensing procedure, what kind of education does a Hearing Professional go through? You might be surprised to learn what it takes for someone to get licensed and what they must learn to get those HIS letters behind their name.

Final question, if YOU came to the conclusion that you need a hearing test would you go to a non-licensed person for your help or to someone who has been trained to not only test your hearing but also be able to read those results and know if there is something more than a hearing loss going on?

Thank you, I hope you make the correct decision.

Sincerely,

[Redacted signature]

[Redacted name]

[Redacted address]

"People who wonder if the glass is half empty or half full miss the point. The glass is refillable."
-Unknown

From:

[REDACTED]

To:

bcrccomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

[REDACTED]

Subject:

RE: Iowa Chiropractic Licensure Board

[REDACTED]

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the boards knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From:

To:

BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Bcc:

Subject: Licensure deregulation

Date: Fri Sep 01 2023 08:24:57 CDT

Attachments:

Hello my name is [REDACTED], I am a state licensed hearing instrument specialist as we as a National Board Certified Hearing Instrument specialist. I have worked and treated patients in the state of Iowa for approximately 10 years.

I recently was notified about the possible deregulation of licensed hearing instrument specialist in Iowa and frankly I am appalled.

There is a lot to proper fitting, testing, programming, counseling that goes into taking care of a person's hearing health. This is not a retail hand them the box of hearing aids product. If you have ever known anyone with hearing loss it is quite frustrating for the patient and can be particularly debilitating emotionally if not handled with the utmost professional education and care. These people do not want to be sold a product. They need a licensed qualified professional to determine their type of loss before fitting. On some cases it takes an expert in the field to uncover other possible medical issues so we can refer them to a Dr. That is precisely why we are licensed. We know what we are doing. To let any unlicensed fly by night used car salesman fit hearing aids would be an ethical disaster. People want help long term guidance with their hearing health by licensed professionals, not unqualified fit them and forget them salespeople. The question you must ask yourself would be if this was your family member what would think would be in their best interest? You know the answer deep in your heart. Please think carefully and understand that deregulation of our licensed hearing instrument specialists in our great state is not the answer.

Thank you

[REDACTED]

The standard is the standard.
(Mike Tomlin)

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: comment on eliminating the Board of Psychology
Date: Fri Sep 01 2023 08:29:21 CDT
Attachments:

Good morning,

I'm reaching out as a licensed psychologist in the state of Iowa to express my concern about Governor Reynolds' proposal to disband the Board of Psychology and collapse it under a new Board of Behavioral Health. Each mental health/behavioral health discipline has its own code of ethics, scopes of practice, training programs, etc. which needs unique/specialized oversight by a Board made up of clinicians in that particular field. Unfortunately I do not think a new Board combining multiple disciplines will be more efficient as Board members will need to learn/review/consider multiple sets of codes of ethics, rules of professional practice, etc. to do their work which is cumbersome and the opposite of efficiency (and most concerning, may be misunderstood thus decisions will not be based upon correct information). Additionally, I am deeply concerned that a Board made up of multiple disciplines will lead to psychologists being regulated by people who are not of their own discipline, which can lead to disadvantageous outcomes (and perhaps even in an unjust way if Board members are not truly impartial). For example, there are many more master's level clinicians in the state, so if the new Board is formed proportionally there would be an underrepresentation of input from the psychology discipline when it comes to making decisions about a psychologist's license. That is deeply problematic to me.

Iowa is in the midst of a severe mental health crisis and shortage of providers. My concern is actions like this proposed change will drive current clinicians (such as myself) out of the state, and prevent other clinicians from moving in (which I know is already happening due to recent legislation). It's in the best interest of Iowans to keep professional boards separated by discipline.

Please respond to let me know my comment has been logged for review.

Sincerely,
[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Confidentiality Notice: Email is not a secure form of communication. This email is intended for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential, and exempt from disclosure under applicable law. If you have received this communication in error, please do not distribute, notify the sender by e-mail at the address shown above, then delete the original message with any attachments. Please be aware that email communication can be intercepted in transmission or misdirected. Your use of email to communicate protected health information to us indicates that you acknowledge and accept the possible risks associated with such communication. Please consider communicating any sensitive information by telephone, secure message, or mail. If you do not wish to have your information sent by email, please notify the sender immediately. Thank you for your compliance.

From:

[REDACTED]

To:

BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

[REDACTED]

Subject:

Comments on Hearing Instrument Licensure

[REDACTED]

[REDACTED]

Attention Boards and Commissions Review Committee-Please see attachment on my comments regarding Hearing Instrument Specialist Licensure.

Thank you for your consideration in this matter.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Owner:

[REDACTED]

Filename: BCRC comments Document.pdf

Last Modified: Fri Sep 01 08:30:21 CDT 2023

Date-9/1/23

Boards and Commissions Review Committee:

BCRCcomments@iowa.gov

My name is [REDACTED] and I'm a Hearing Instrument Specialist in Mason City Iowa. I'm writing today to express my concern on your committee's action to possibly discontinue the Hearing Instrument Specialist Licensing Board. See below on why I think this action would not be good for the people in Iowa who require Hearing Aids:

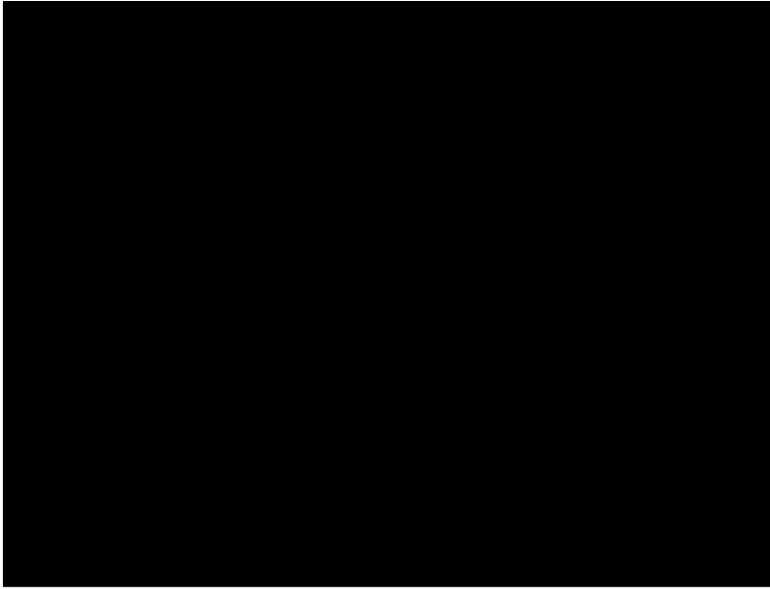
- Eliminating the Board will compromise patient safety, satisfaction, and access.
- The U.S. Food and Drug Administration's recent regulatory changes necessitate preserving the Board, not eliminating it. This is because the FDA reclassified non-OTC hearing aids as "prescription medical devices" **that may only be dispensed upon a prescription or other order from a state-licensed practitioner, including hearing aid specialists. Eliminating the Board will result in the loss of licensure for every hearing aid specialist practitioner.** This will effectively prevent hearing aid specialists from being able to assist Iowans (your constituents) obtain the hearing care they need, drastically reducing patient access across the state. Thus, any belief that the Board may somehow now be unnecessary considering the FDA's recent regulatory changes would be deeply mistaken. I would conservatively estimate that over half of the Hearing Aids dispensed in Iowa are through Hearing Instrument Specialist!
- The proposed elimination of the Board would effectively force Iowans to seek hearing care from unregulated providers, many of whom should be expected to be fly-by-the-night online hearing aid companies that employ unscrupulous tactics to prey on consumers that need the help of a regulated medical profession such as hearing aid specialists.
- Eliminating the Board, and thus licensure of hearing aid specialists, will result in the closure of many small, family-owned clinics that provide good, paying jobs in your communities.

As Stated above this would not be good for the people of Iowa.

Thank you for your consideration in this matter.

Cont.

Respectfully,



From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: RE: AT Licensure
Date: Fri Sep 01 2023 08:30:22 CDT
Attachments:

Dear Board of Review, I am writing this email in response to the recommendation that the "AT licensure requirement be removed" in the state of Iowa. I have been a head varsity soccer coach for over 15 years in Williamsburg and have seen my fair share injuries. Many schools we compete against do not have a certified AT onsite and when we have had a player go down, it is really obvious. Too many times their unlicensed athletic trainers were unsure of the scope of the injury and were unprofessional in their approach. I feel more than blessed that we have the AT that we do here at Williamsburg. She is fully licensed and takes her job seriously, professionally and personally. Her diagnosis is quick and spot on. When opposing teams arrive and ask if we have a trainer, I tell them that our athletic trainer is one of the best and that she has never misdiagnosed an injury yet in her tenure with us. I feel that the AT portion of your license holds these professionals at a higher level than a simple certificate of training that their other colleagues may hold. I believe it provides uniformity to the profession. I also feel that this requirement insures the utmost safety for our student athletes. Knowing that these teens are getting the right diagnosis and prescribed protocol and PT is huge to the family a tremendous relief to me as a coach by freeing me up to do what I love, coach! Kindest regards, [REDACTED]

From: [REDACTED]
To: BCRCComments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Board of Athletic Training- Comments
Date: Fri Sep 01 2023 08:30:34 CDT
Attachments:

Good morning,

My name is [REDACTED], an Iowa resident, an Athletic Trainer, an assistant professor at Drake University, and a pediatric concussion and sports safety researcher and advocate.

There have been recent conversations about eliminating the athletic training licensing board and leaving it up to employers to determine who is qualified to provide healthcare as an athletic trainer to our student-athletes and other professionals. Licensure protects the public and lets patients and employers quickly know that an athletic trainer has been trained appropriately, stays on top of best practices through continuing education, and is being monitored. Licensed athletic trainers follow similar parameters as many other healthcare professions with required continuing education units and a National Provider Number. Simply passing the Board of Certification should not be the standard in Iowa. The board of athletic training is not an expense; the fees ATs pay cover the costs, and we have volunteers who serve on the committee.

Currently, 47 states and the District of Columbia require licensure for Athletic Trainers. Of the 3 remaining non-licensed states, New York has a licensure bill awaiting the Governor's signature, and California has pending licensure. The other remaining state still regulates athletic trainers. Currently, CA is the only state that does not regulate athletic trainers, but they have a current bill to protect student-athletes to regulate athletic trainers. If Iowa eliminates the Board of Athletic Training, we will move backward and become the only state not regulating athletic trainers.

Lastly, athletic trainers are healthcare professionals who provide medical services to all patients, not just high school students. Across the United States, we have athletic trainers in all settings, including youth sports, secondary school, college, performing arts, public safety, occupational health, and armed forces. Removing licensure would impact not only our youth sports but a number of patients and clients in Iowa currently being served by an athletic trainer. Eliminating licensure would directly impact our athletic trainers who travel with athletics teams,

as they may be unable to practice across state lines. Several states allow athletic trainers to practice clinically if their home state maintains similar or the same regulatory requirements. This could pose a major problem for any of our collegiate, professional, or traveling sports teams. Athletic trainers are recognized healthcare professionals and are allied providers to several healthcare professionals in the state.

I urge you to strongly consider the impact eliminating the licensing board for athletic training will have on the communities in Iowa and all patients who are being treated by an athletic trainer.

Please feel free to reach out with any questions or concerns.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<brcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Hearing Instrument Specialist deregulation
Date: Fri Sep 01 2023 08:31:37 CDT
Attachments:

I am writing in opposition to the deregulation of licensing for Hearing Instrument specialist in Iowa. I am a patient care coordinator who, for the last 5 years, has worked for the largest employer of hearing instrument specialist in Iowa and Nebraska. Last year we fit over 4000 Iowans with hearing aids from licensed trained professionals.

There are countless reasons why the de regulation of our profession is a terrible idea. We fit prescriptive medical devices that require extensive training and licensing to be able to fit patients properly and effectively. In the course of our work, we are trained to discover underlying medical conditions that can be medically serious that require the intervention of a doctor or ENT. These conditions can be something as simple as impacted earwax, or something more significant like brain tumors. Untrained and unlicensed individuals have no ability to recognize these serious, underlying medical conditions, and these patients would go untreated, and could have a very significant impact on their health.

Last October the FDA approved over the counter hearing aids. They develop two classifications of hearing aids. Over-the-counter hearing aids require no hearing test no evaluation and are not seen by a licensed professional. The other class of hearing aids are referred to as prescription hearing aids. Prescription, hearing aids are required to be fit a licensed professional. This would eliminate the entire category of prescription hearing aids with deregulation. Prior to the launch of over-the-counter hearing aids there were many surveys done throughout the industry to evaluate the public's perception of the need of a license professional to fit and treat the hearing loss properly. In countless studies up to 96% of individuals acknowledged the importance of the interaction with a licensed hearing care professional to properly treat their hearing loss.

Since the launch of over-the-counter hearing aids, our business is actually up by over 20%. Over-the-counter hearing aids have had no impact whatsoever on the hearing aid industry. I believe this solidifies the understanding and the need for licensed trained professionals to treat the patients properly and effectively.

Deregulation of licensing for hearing instrument specialist would open the door for anyone to fit the unknowing and vulnerable, predominantly, senior population. The outcomes of these fittings would be very poor and the consequences to the patients would be astronomical. If a

person tries hearing aids and is unsuccessful with them statistically they wait 5 to 7 years to try hearing aids again. In the course of that time the hearing loss can become so great that hearing aids even at a premium level are ineffective. Recent studies have shown that untreated hearing loss has a significantly higher chance of developing Alzheimer's and dementia. There are higher risks of falling, social isolation, and depression for those with untreated, hearing loss.

The International Hearing Society administers the license exam for hearing instrument specialist in 40 states. There is significant training and learning involved to be able to pass the international license exam. The exam is designed to prove total competency to be able to safely and effectively work in our profession. Even with this extensive training the first time pass rate of the exam is only 60%. So even properly trained individuals require a great deal of time to be able prove competency. What would an individual with no training whatsoever be able to do for an unsuspecting person in need of proper hearing healthcare?

There are many other reasons why eliminating the hearing instrument specialist board is a very poor idea for the interest of thousands of lowans. Please take this into consideration.

Thank you,

[Redacted signature block]

From:

[REDACTED]

To: BCRCComments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Bcc:

Subject: DO NOT combine boards

Date: Fri Sep 01 2023 08:34:15 CDT

Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Yours In Health,

[REDACTED]

From: [REDACTED]
[REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Licensing
Date: Fri Sep 01 2023 08:34:19 CDT
Attachments:

Board and Commissions Review Committee,

Please understand the rigorous time and education we apply when helping people with hearing loss. This is extremely important to our profession and our patients.

One of the most important parts of helping the hearing impaired is follow-up visits from them to adjust and enhance their hearing through our extensive studies and continuing education.

I am writing in opposition to the deregulation of licensing for Hearing Care Professionals in Iowa.

We take our profession very serious! Our patients understand our passion and commitment to their inability to hear properly. Again, this comes from our extensive education in properly helping the hearing impaired.

Thank you for your consideration.

Best regards,

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Opposition to the elimination of the AT Board
Date: Fri Sep 01 2023 08:34:38 CDT
Attachments:

To whom it may Concern:

As an AthleticTrainer in the state of Iowa, I am in shock that this committee is willing to disregard the professional licensure of a medical profession. Athletic Trainers (AT) are healthcare professionals who prevent, evaluate, and treat not only orthopedic injuries, but all conditions that are presented from our patients. We are the first line of defence for medical emergencies and concussion in sports. There is no way you or your children have not encountered an AT at some point in their sports career. We are NOT Personal Trainers!

Why can't the profession of AT be combined with the PT/OT boards? Just because we have a smaller number of practitioners in the state (1100+), doesn't give you the right to take away our professional license to practice. ALL states either have or are in the process of obtaining regulation of their ATs. Why would Iowa want to be known for erasing 30 years of AT licensure?

Not having a licensed HEALTHCARE professional on the sideline of sporting events is a PUBLIC SAFETY issue. The Board of AT does NOT cost the state anything. Our fees pay for the costs of the board. The only impact is devastation to a profession that has worked so hard for respect and recognition. Just lump us with our colleagues the PTs and OTs if you must "make government smaller"

[REDACTED]

From:

[REDACTED]

To:

BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

[REDACTED]

Subject:
possible

Relating to the brain and how to help people hear better to live to the fullest life

[REDACTED]

[REDACTED]

I am writing today to urge that the Iowa Board of hearing should not be removed-
The watch dog of the industry- we need all the specialized help in the hearing industry-
Relating to the brain and how to help people hear better to live to the fullest life possible. The
seriousness of removing a board such as the Iowa hearing- we will go backwards on hearing
for good- We need to have involved companies with prescribed hearing health- that will
properly train counsel and help screen for medically needs- Not giving hearing the most
attention will make a customer or patient lose hope and discourage from treating the help the
body and mind needs.
please keep the board in the state-

[REDACTED]

From:

To:

BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Bcc:

Subject: Hearing Instrument Specialist deregulation

Date: Fri Sep 01 2023 08:39:23 CDT

Attachments:

To whom it may concern,

As a patient care coordinator, I have seen firsthand the impact of the certification of our specialists has on our community. These are just a few reasons why it is imperative to the health and wellbeing of those with hearing impairment, to receive care from a licensed health care professional.

First, there are those that come for evaluation seeking help from hearing devices, who require a medical referral. Just recently we had a 38-year-old male come for evaluation and was having trouble hearing. After one of our licensed hearing specialists did a full hearing exam and otoscopic inspection, he was referred to have his ears flushed for wax impaction. He did NOT need hearing devices to remedy his impairment. Without having received the proper training and licensing, he may have been fit with hearing aids elsewhere, and never been told that he simply needs his ears cleaned.

Next, my mother-in-law received hearing devices from Miracle Ear. Based on her audiometric evaluation and her dexterity, it was determined that she needed to be fit with custom molds. Taking impressions done without licensing, training and proper technique, could've resulted in physical trauma for her. Because this process was done by a fully licensed and trained healthcare professional, the proper sanitation protocols were followed, and the procedure for the impressions done safely and accurately. The risks of performing an impression improperly are very dangerous and can result with injuries affecting the rest of someone's life.

Lastly, the trust we build with all those coming through our doors knowing that they are receiving care from a certified and trained professional is paramount. When a person walks into a medical office of any kind, and they can see the certificates and licensure posted throughout the office, they know they are going to receive health care from a knowledgeable and trained professional. No one should ever feel fear, doubt, or anxiety because they question the abilities and training of their healthcare provider. By having earned that certification, and by continuing to receive education, our licensed specialists are able to provide a safe and clean environment where people in our community can come and receive proper care.

I would never want anyone from my own family, and I'm sure you wouldn't for yours as well, to receive healthcare of ANY kind from someone that doesn't know what they're doing. Having proper training and licensure of hearing healthcare professionals is imperative to the health

and well being of those in our community with hearing impairment needs. This should be a common sense notion. Thank you.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Hearing instrument specialist degregation
Date: Fri Sep 01 2023 08:43:29 CDT
Attachments:

Dear Sir or Madam,

Hello, my name is [REDACTED] I am a licensed Hearing Instrument Specialist in Iowa and have been for 9 years. I am writing to you today to express my deep concern regarding the deregulation of licensing. By allowing this to pass there would be detrimental effects to our patients.

Hearing loss should be treated like any other medical condition. It requires a trained professional to diagnose and treat. Most hearing losses are related to nerve damage or heredity but there are so many possibly serious reasons that require surgical intervention.

During my time as a licensed Hearing Instrument Specialist I've referred many patients to the Dr for various health reasons. There was one time a patient came into my office and after our initial check up I knew something was not right. I referred her to her Dr and found out she had a Cholesteatoma. If this had gone untreated she would have lost all of her hearing in that ear. Through training and practice I was able to spot a serious medical condition. A few times patients have come in and after testing I see that they have an air bone gap. Following FDA regulations I referred them to their Dr. They ended up having to have a stapedectomy in order to save their middle ear. If people are allowed to practice without a license so many of these cases would go undiagnosed or misdiagnosed.

The patients I see deserve to receive the best service. By deregulating licensing in this field you will be devaluing the care we provide. The public would suffer. Hearing aids give people part of their life back. No hearing aid sale is just sale. It's an emotional journey I help my patients through. We spend so much time making adjustments and working through issues. I am good at my job because of the training I went through to obtain my license.

On a personal level, I know that I would want any of my loved ones experiencing a hearing loss to receive the best possible care. Like all other medical conditions this can only be done with someone who is licensed. A licensed person who keeps on top of new developments in their field and goes through training programs to receive the knowledge they need to perform their job at an expert level.

People don't go through this licensing process because it is easy. They go through it because they love the field and want to be equipped with the knowledge they need to perform at the best level they can.

Please take the time to consider what passing this would do to communities. I think when you put thought into it and consider the repercussions it will have on all hearing aid users you won't let it pass.

Thank you for your time,

[REDACTED]

[REDACTED]

Get Outlook for iOS

From: [REDACTED]
To: BCRCcomments@iowa.gov
<brcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Board of Hearing Aid Specialists
Date: Fri Sep 01 2023 08:44:08 CDT
Attachments:

To Whom It May Concern -

This email is in regards to the motion to eliminate the Board of Hearing Aid Specialists. The elimination of the Board of Hearing Aid Specialists would be an ill-advised policy decision that will put consumers and patients in harm's way. If the Board is eliminated, it will effectively deregulate our profession, allowing bad actors to flourish and jeopardize the integrity of the important services we provide in our communities—helping our patients hear better.

Eliminating the Board will compromise patient safety, satisfaction, and access.

The U.S. Food and Drug Administration's recent regulatory changes necessitate preserving the Board, not eliminating it. This is because the FDA reclassified non-OTC hearing aids as "prescription medical devices" that may only be dispensed upon a prescription or other order from a state-licensed practitioner, including hearing aid specialists. Eliminating the Board will result in the loss of licensure for every hearing aid specialist practitioner. This will effectively prevent hearing aid specialists from being able to assist lowans obtain the hearing care they need, drastically reducing patient access across the state. Thus, any belief that the Board may somehow now be unnecessary considering the FDA's recent regulatory changes would be deeply mistaken.

The proposed elimination of the Board would effectively force lowans to seek hearing care from unregulated providers, many of whom should be expected to be fly-by-the-night online hearing aid companies that employ unscrupulous tactics to prey on consumers that need the help of a regulated medical profession such as hearing aid specialists.

Eliminating the Board, and thus licensing of hearing aid specialists, will result in the closure of many small, family-owned clinics that provide good, paying jobs in your communities.

Please consider all of these items carefully before you vote.

Thank you,

[REDACTED]

[REDACTED]

From: [REDACTED]
[REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Opposition to the Deregulation of HIS Licensure
Date: Fri Sep 01 2023 08:46:11 CDT
Attachments:

I am writing this email to express my deepest opposition to the deregulation of licensure for Hearing Instrument Specialists in the State of Iowa.

As a licensed Hearing Instrument Specialist, myself, I understand how vital it is to have licensed professionals in this field. We follow a strict set of guidelines and standards to provide the best patient care possible. By deregulating my/our licenses, you are putting our patients and anyone with hearing loss at risk. Please consider the moral thing to do, and keep licensing for the Hearing Instrument Specialists in our state.

Firstly, the wide scope of practice this profession provides requires a lot of knowledge that one cannot simply be provided without proper education. Anatomy, acoustics, patient care, and infection control just to name a few. We are an ever changing profession, which requires a lot of continuing education to maintain the best level of care.

Working in a more rural area, most times, my patient' first step to get help for their hearing needs is my office, and for others very similar offices. Not only are we screening for hearing but also other ear-related disorders and diseases. This can be as simple as ear wax impaction to severe medical conditions like tumors and bone growths. Someone without the proper education and training could easily miss these things, ultimately at the expense of the patients' health.

Our licensing exam sets the standard to practice. Taking this exam is not an easy feat. Even with many months of training not many people pass their first time. By removing this, any and all could provide this care leaving many patients, mostly seniors susceptible to low levels of care by untrained professionals. Fitting prescriptive hearing aids requires a high level of knowledge. Under fitting, over fitting, and miss fitting patients would become more prevalent.

Please consider my opposition to the deregulation of the HIS Licensure. By licensing these professionals, we can provide the best level of care to those with hearing loss.

Thank you for your time and consideration.

[REDACTED]

[REDACTED]

[REDACTED]

From:

[Redacted]

To: BCRComments@iowa.gov
<bcrcomments@iowa.gov>

Cc:

Bcc:

Subject: Licensure deregulation

Date: Fri Sep 01 2023 08:50:16 CDT

Attachments:

I am a Patient Care Coordinator at Miracle Ear. I am opposed to the deregulation of licensed hearing care professionals. I have seen several patients come in that have purchased OTC hearing aids and they still can't hear. I believe it is a disservice to hearing impaired people to let just anyone sell them hearing aids and not be able to actually fit hearing aids to a patient's prescription.

Thank you

[Redacted]

[Redacted]

[Redacted]

[Redacted]

From:

[REDACTED]

To:

BCRCcomments@iowa.gov
<BCRCcomments@iowa.gov> <bcrccomments@iowa.gov>

Cc:

Bcc:

Subject: Licensure

Date: Fri Sep 01 2023 08:50:54 CDT

Attachments:

To whom it may concern,

I am writing this email to address the deregulation of licensing the Hearing Instrument Specialist in the state of Iowa. I feel I must advocate for my fellow Specialist and the individuals I serve. Deregulation would be a huge injustice to individuals we serve. They deserve to have a competent individual over seeing their hearing health. The Hearing Instrument Specialist does not only focus on selling hearing aids, they are also trained to identify other health risks associated with hearing loss. Without the proper licensing or regulations in place, I feel our seniors / patients will not only be taken advantage of, but perhaps misdiagnosed when a trained professional could have caught a minor issue or a life threatening one.

Thanks,

[REDACTED]

Sent from Mail for Windows

From:

To:

BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Subject:

Hearing Instrument Specialist deregulation

I am writing to oppose the deregulation of licensing for Hearing Instrument Specialist. I have been working in the industry as a Patient Care Coordinator. The first question asked when scheduling a new patient: "Is the consultant licensed? Does he know what he is doing?" Our patients are predominantly older. They put their trust in a trained professional. Trust is the key word there. They trust that the person that is looking in their ears knows what they are looking at/for. They trust in the person they are writing a check to know what is best for them and will be there to help them through the process. They trust that they are going to get something for that check they write instead of a "thanks so much" and never see them again

Would you trust any specialist that YOU go to that doesn't have training and a license? I know I would not.

Yes, times are changing, but the necessity of a trained, licensed professional is not.

Thank you,

[Redacted signature block]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Please keep athletic training license requirement and state Board of Athletic Training
Date: Fri Sep 01 2023 08:54:03 CDT
Attachments: Outlook-a2fmg4lx.png

Dear Boards and Commissions Review Committee,

I am reaching out to comment on the proposed changes to committees/boards in our state and particularly the recommended elimination of the Board of Athletic Training. I cannot begin to state how alarming this is for the safety of athletes and patients in this state. Athletic trainers play a vital role in the safety of young athletes playing sports in our state daily, as well as in emerging setting such as the hospitals and clinics, military setting, and industrial employees, to name just a few of the many settings pertinent for athletic trainers as healthcare providers.

The presence of athletic trainers allows coaches to coach and allows a licensed healthcare provider to prevent, evaluate, treat, and rehabilitate injuries. Additionally, if an emergency occurs, athletic trainers are present to provide the necessary immediate care and activate an emergency action plan/response. Finally, and more specifically, with concussion care being such an important and vital topic, having trained professionals who can diagnose and treat head injuries accurately and effectively is necessary for safe participation in sports.

There are many stories of the importance of athletic trainers, too many for this one email, but I will share a few. [REDACTED], who graduated from Pleasant Valley High School and played football at Iowa, was working out in Bettendorf and collapsed. An athletic trainer's quick and effective response to his cardiac issue is why he is still alive today. Last year, athletic trainers at two different high schools in Iowa accurately diagnosed internal organ damage and saved their athlete's lives. Athletic trainers at a university in Iowa saved the life of a basketball manager during practice a few years ago and saved an athlete from paralysis last year by properly treating a cervical spine injury. In the hospital/clinic setting, athletic trainers see patients under physicians and help diagnose and treat injuries that could be detrimental if left untreated. I could go on and on with more stories. In each case, you needed a licensed healthcare professional there, on site, to have a positive outcome. Having to call medical help or having someone without the right qualifications present could have led to a poor outcome. Athletic trainers are the professionals that are trained to be on site and take care of these injuries.

If the licensing system for athletic trainers was removed, it would be up to the schools who are hiring athletic trainers determine the viability of an individual to be an athletic trainer. That means the schools and often athletic administrators or coaches who are not trained in healthcare will be charged with determining who is qualified to provide healthcare. While I have respect for athletic administrators and coaches, they are not the best individuals to hire a healthcare provider. Overall, this change hurts the public and makes participation in sport less safe.

Additionally, by removing the licensure system from our state, we would rely only on the Board of Certification (BOC) exam as a way of assessing the quality of an athletic trainer. While this exam is designed to protect the public by screening recent graduates for basic knowledge and skill, a means for our state to monitor athletic trainers and ensure continuing education is necessary for public protection as best practices will naturally evolve over an athletic trainer's career.

My education has not been a timeline to take lightly. I obtained my Bachelor of Athletic Training from Luther College in 2017. I then went on to earn my Master of Athletic Training from AT Still University in 2019. Subsequent to graduate schoolwork, I also completed a one-year orthopedic athletic training residency program at University of Iowa to further specialize in my specific area of athletic training within the hospital and clinic system. This type of education track is similar to the medical model that physicians follow to become licensed within the country. Thus, proving how imperative the license process is for athletic trainers as healthcare providers. As a loose analogy, I'm guessing you would not want a physician to practice on you who is not licensed.

The move to eliminate the Board of Athletic Training is a backward movement in comparison to the rest of the country. Across the US, 49/50 states have some form of regulation of the profession athletic training. The one remaining state has an active bill which would require regulation of the practice of athletic training. Licensure is required in 47/50 states. Thus, by moving away from licensing athletic trainers in our state, we would be moving in the opposite direction of everyone else and in this case, being different is not a good thing.

Thank you for the consideration of these comments and I ask that you reconsider the elimination of the Board of Athletic Training.



Owner:

[REDACTED]

Filename: Outlook-a2fmg4lx.png

Last Modified: Fri Sep 01 08:54:03 CDT 2023

Outlook-a2fmg4lx.png for Printed Item: 21
Attachment 1 of 1)

UNIVERSITY OF IOWA

Page 337 of 1221

HEALTH CARE

From:

To:

BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Bcc:

Subject: Hearing Instrument Specialist deregulation

Date: Fri Sep 01 2023 08:55:59 CDT

Attachments:

I recently was notified about the possible deregulation of licensed hearing instrument specialist in Iowa and frankly I am appalled.

There is a lot to proper fitting, testing, programming, counseling that goes into taking care of a person's hearing health. This is not a retail hand them the box of hearing aids product. If you have ever known anyone with hearing loss it is quite frustrating for the patient and can be particularly debilitating emotionally if not handled with the utmost professional education and care. These people do not want to be sold a product. They need a licensed qualified professional to determine their type of loss before fitting. On some cases it takes an expert in the field to uncover other possible medical issues so we can refer them to a Dr. That is precisely why we are licensed. We know what we are doing. To let any unlicensed fly by night used car salesman fit hearing aids would be an ethical disaster. People want help long-term guidance with their hearing health by licensed professionals, not unqualified fit them and forget them salespeople. The question you must ask yourself would be if this was your family member what would think would be in their best interest? You know the answer deep in your hear. Please think carefully and understand that deregulation of our licensed hearing instrument specialists in our great state is not the answer.

One of the major problems I see with deregulating this profession is that people will not know who they are dealing with when they reach out for help.

Has this person any idea of what to look for when they test the hearing or even look in the person's ears prior to testing? How long have they been "in the business". I have worked with many consultants, and I know of cases where lives were saved. I am not exaggerating, based on test results people were referred to a doctor and in two cases brain tumors were discovered. How will that still happen when anyone can open an office to sell aids without having gone through the licensing procedure?

Ask yourself, would you buy glasses from someone other than a licensed optician?, give birth helped by your someone who has always just wanted to work with babies instead of an OBGYN or trained Midwife? We laugh at people who google symptoms online instead of going to a doctor but with deregulating this profession you are asking people to do just that, not to get a trained licensed professional to diagnose their condition but to leave it up to someone who thinks this might be a good way to earn money.

Last October the FDA approved over the counter hearing aids. They develop two classifications of hearing aids. Over-the-counter hearing aids require no hearing test no evaluation and are not seen by a licensed professional. The other class of hearing aids are referred to as prescription hearing aids. Prescription, hearing aids are required to be fit a licensed professional. This would eliminate the entire category of prescription hearing aids with

deregulation. Prior to the launch of over-the-counter hearing aids there were many surveys done throughout the industry to evaluate the public's perception of the need of a license professional to fit and treat the hearing loss properly. In countless studies up to 96% of individuals acknowledged the importance of the interaction with a licensed hearing care professional to properly treat their hearing loss.

Deregulation of licensing for hearing instrument specialist would open the door for anyone to fit the unknowing and vulnerable, predominantly, senior population. The outcomes of these fittings would be very poor and the consequences to the patients would be astronomical. If a person tries hearing aids and is unsuccessful with them statistically, they wait 5 to 7 years to try hearing aids again. In the course of that time the hearing loss can become so great that hearing aids even at a premium level are ineffective. Recent studies have shown that untreated hearing loss has a significantly higher chance of developing Alzheimer's and dementia. There are higher risks of falling, social isolation, and depression for those with untreated, hearing loss.

The International Hearing Society administers the license exam for hearing instrument specialist in 40 states. There is significant training and learning involved to be able to pass the international license exam. The exam is designed to prove total competency to be able to safely and effectively work in our profession. Even with this extensive training the first-time pass rate of the exam is only 60%. So even properly trained individuals require a great deal of time to be able prove competency. What would an individual with no training whatsoever be able to do for an unsuspecting person in need of proper hearing healthcare?

There are many other reasons why eliminating the hearing instrument specialist board is a very poor idea for the interest of thousands of lowans. Please take this into consideration. I wouldn't want just anyone looking into my ears or testing me that do not know anything about it or that are not licensed.

thank you.

Thank-you

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From:

[Redacted]

To:

BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Bcc:

Subject: Hearing Instrument Specialist deregulation

Date: Fri Sep 01 2023 09:12:54 CDT

Attachments:

Hello,

I'm writing today to express how important it is that we keep the regulation of hearing specialists in Iowa. Without the knowledge and education that specialists currently receive it could be detrimental to peoples opportunity to receive the proper care for their ears. It would be extremely reckless to allow people to run tests, sell hearing aids and provide the care that is required after without any sort of education/training/ certification.

Thank you,

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Board and Commission Review Committee
Date: Fri Sep 01 2023 09:14:22 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment, I have been in Chiropractic practice for the past 26 years in Cedar Rapids, I feel that is is vital that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

Yours in Health,



CONFIDENTIALITY NOTICE: The information transmitted in this message is intended only for the person(s) or entity to which it is addressed and may contain confidential and/or legally privileged material. Delivery of this information to any person other than the intended recipient (s) is not intended in any way to waive privilege or confidentiality. Any review, transmission, dissemination or other use of, or taking any action in reliance upon this information by entities other than the intended recipient is prohibited. If you have received this information and you are not a named recipient, please notify me, delete the information from any computer and destroy all copies.

From:

[REDACTED]

To:

BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

[REDACTED]

Subject:

OPPOSITION TO ELIMINATE THE BOARD OF HEARING SPECIALISTS
[REDACTED]

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Proposal of Elimination of AT Licensure
Date: Fri Sep 01 2023 09:16:28 CDT
Attachments:

Hello,

I'm emailing you with a concern about the elimination of the Iowa Board of Athletic Training as well as the elimination of AT's licensure.

I am a student-athlete on the Rowing team at the University of Iowa. As a student athlete I know first-hand how important it is to have a well-educated athletic trainer. My trainer's name is [REDACTED]. She is incredibly knowledgeable about her field and is a phenomenal athletic trainer. I can't image the possibility of someone without the proper education taking care of athletes. This is very detrimental to not just the profession, but to the thousands of patients who athletic trainers care for every day in our state. Elimination of licensure would lead to danger and safety issues for all of our physically active patients, but especially our youth athletes.

Allowing people without the proper training to be able to take the exam is a dangerous idea. Kezia is extremally insightful with the many injuries that may arise within the rowing team. Providing the wrong treatment could result in worse outcomes for the athletes.

This proposal also degrades athletic trainers everywhere and all the hard work they've gone through to become experts in their profession.

Please take these thoughts into consideration with decision making going forward.

[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: OPPOSITION TO ELIMINATE THE BOARD OF HEARING SPECIALISTS
Date: Fri Sep 01 2023 09:17:20 CDT
Attachments:

To whom it may concern,

As a fully licensed hearing instrument specialist for over 7 years with Miracle Ear, I STRONGLY oppose the proposition to eliminate the board of hearing aid specialists. Eliminating the board would compromise the safety, trust, and health of both current and future hearing-impaired patients in our state.

If a person seeking hearing help receives no evaluation from a licensed and certified professional, there are many possible negative outcomes. First, a person may not even need a hearing device at all. Many times in my career I have had to refer someone to an Ear, Nose and Throat Doctor for medical attention OTHER than a hearing aid. There have been those with acoustic neuroma's, perforations of their ear drums, fluid in their Eustachian tubes, ear infections, wax impactions, and the list goes on and on. If I were not certified and licensed, it would have been all too easy to sell hearing devices to ALL of those people, and in effect throw their hearing healthcare in the garbage. It is imperative that these members of our community are given proper evaluation by a professional with the right training, so they're health and quality of life is put first every time.

Next, and extremely important, a full and precise audiometric evaluation MUST be completed on every person with hearing impairment. This needs to be done to determine that success with a hearing device is even possible. Every person deserves quality care with their health in every aspect, and hearing should be treated no differently than any other. Being certified and trained to prescribe and fit a hearing device to each individual person's hearing loss is CRUCIAL for their success and quality of life. If the board for hearing specialists is eliminated, people will have limited access to this type of quality care which could result in them being fit improperly. Being under amplified or over amplified are both very real possibilities which can result in further damage to a person's hearing, or lack of quality in their daily life.

I finish by urging you to stop the elimination of the Board of Hearing Specialists. You, a friend, or a loved one, may find yourself in a hearing booth in need of help. When that day comes, you know that having a licensed, trained and fully certified health care professional would make you feel like you have trust in the care you are receiving. Hearing healthcare should NOT be something that you can order in the mail. Hearing healthcare should NOT be something you are afraid of. Hearing healthcare should NOT be taken so lightly that just anyone can do it.

HEARING HEALTHCARE SHOULD BE PERFORMED BY FULLY LICENSED AND CERTIFIED SPECIALISTS AND NO ONE ELSE.

Thank you for your time, and I look forward to the right decision being made to put the health and well-being of our community members first, and keeping the Board of Hearing Specialists in tact.



From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: AT Licensure
Date: Fri Sep 01 2023 09:28:07 CDT
Attachments:

Good morning,

I am writing to voice my opposition to the elimination of the Board of Athletic Training and licensure of athletic trainers in Iowa. This is very detrimental to not just the profession, but to the thousands of patients who athletic trainers care for every day in our state. Elimination of licensure would lead to danger and safety issues for all of our physically active patients, but especially our youth athletes.

In 2018, Athletic Trainers were the driving force behind passage of HF2442, which set standards for concussion management in youth sports. Athletic Trainers are the primary licensed health care providers on the sidelines for all of Iowa's high school football games and other interscholastic sporting events. Removing AT's licensure would conflict with current Iowa code in this area and cause unresolvable problems for high schools trying to protect their students.

California is the only other state without regulation for athletic trainers, and I don't want to see Iowa compared to that state as the only two states who allow delinquent health care professionals to come practice and place our residents in danger.

Licensure provides the highest level of patient protection, and it is the gold standard of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.

Eliminating licensure in Iowa could potentially impact an AT's ability to practice across state lines (travel with their team), depending on regulatory requirements in other states. (ex. some states allow you to practice in their state temporarily, provided your home state maintains the same regulatory requirements).

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From:

[REDACTED]

To:

BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

[REDACTED]

Subject:

Proposal to Merge Iowa Chiropractic Licensure Board

[REDACTED]

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards, for the following reasons:

- * This would create a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions.
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
[REDACTED]
To: BCRCComments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Deregulation of Licensing Hearing Aid Specialists
Date: Fri Sep 01 2023 09:37:58 CDT
Attachments:

I am writing in opposition to the deregulation of licensing for Hearing Instrument specialists in Iowa. I have worked for over 12 years with the largest employer of hearing instrument specialists in Iowa. Last year our Group fitted over 4000 Iowans with hearing aids from licensed trained professionals.

The de-regulation of our profession is a terrible idea for many reasons. Hearing aids are medical devices. Our HCPs are trained and licensed with the ability to fit hearing aids with hearing loss prescriptions. Our offices perform routine checkups for both the patients' ears and hearing aid devices themselves. There have been many issues where the HCP I worked with had to send a patient to an ENT after uncovering a bigger medical issue. My Dad suffered from a hearing loss. He purchased sound amplifiers online and just thought there was no hope for his hearing. When I started working for Miracle Ear, we brought him in to find out he has a curved ear canal with a lot of wax. Later in his life, he was hospitalized for months. He could not hear the Drs or nurses. I voiced my concerns over and over and it wasn't until my husband, a trained, licensed, and board-certified HCP went in and helped him with hearing aids did he finally Get some hearing relief. He never made it out of the hospital and if he hadn't been able to hear the last few months of his life, it would have turned out to be a very sad situation into a much more heartbreaking story. In our office, there was also a patient who came in without much of a loss but after being examined, our HCP saw something unusual. They went to the Dr. and found out they had cancer. An untrained person would not have caught something like that. Our HCPs are also trained in elderly abuse and neglect. They can spot the signs of this and report it when necessary. So much of what they do in the office with patients is so important.

Deregulation of licensing for hearing instrument specialists would allow anyone to fit and take advantage of the people we see. Most of our patients are seniors, some without family nearby. We treat them like our family and take care of them. Our trained professionals work hard to make sure hearing aids are programmed and working to the best of their abilities. Having the ability to hear keeps people, especially seniors, active in their communities. It Goes way beyond handing out a hearing aid and letting them figure it out.

Please take all of this into consideration when you are voting on this. Please make the right choice.

Thank you,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Opposition to Hearing Instrument Specialist deregulation
Date: Fri Sep 01 2023 09:38:49 CDT
Attachments:

I am writing in opposition to the deregulation of licensing for Hearing Instrument Specialist in Iowa. I am a board-certified hearing instrument specialist and have been licensed in Iowa for almost 10 years.

I am greatly concerned for our citizens of Iowa if this goes through. There is a lot of care that goes into fitting someone with hearing aids, and a lot of training that goes into that. I cannot imagine having my mother or grandmother go to someone un-licensed without the knowledge that it takes to fit someone with hearing aids. A lot of the time, we see people that have had a sudden loss or something else that needs medical attention, instead of going to the doctor first we are their first stop, without the licensing board and knowledge to know to do a medical referral these people would just be fitted with hearing aids and not be sent to the doctor for a proper medical diagnoses. I have had some patients that I have sent for a medical referral and they were diagnosed with an acoustic neuroma that would have gone undiagnosed.

I strongly encourage you to put our citizens of Iowa first and keep the licensing for Hearing instrument specialist.

Thank you,
[REDACTED]

From: [REDACTED]
[REDACTED]
[REDACTED]
To: BCRCComments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Opposition to removing Licensure for hearing instrument specialists
Date: Fri Sep 01 2023 09:39:18 CDT
Attachments:

My name is [REDACTED]. I am 59 years old and born and raised in Iowa my whole life. I have been permitted and licensed Hearing instrument specialist since 1997. I STRONGLY oppose the proposition to eliminate the board of hearing aid specialists. Eliminating the board would compromise the safety, trust, and health of both current and future hearing-impaired patients in our state.

If a person seeking hearing help receives no evaluation from a licensed and certified professional, there are many possible negative outcomes. First, a person may not even need a hearing device at all. Many times in my career I have had to refer someone to an Ear, Nose and Throat Doctor for medical attention OTHER than a hearing aid. There have been those with acoustic neuroma's, perforations of their ear drums, fluid in their Eustachian tubes, ear infections, wax impactions, and the list goes on and on. If I were not certified and licensed, it would have been all too easy to sell hearing devices to ALL of those people, and in effect throw their hearing healthcare in the garbage. It is imperative that these members of our community are given proper evaluation by a professional with the right training, so their health and quality of life is put first every time.

Next, and extremely important, a full and precise audiometric evaluation MUST be completed on every person with hearing impairment. This needs to be done to determine that success with a hearing device is even possible. Every person deserves quality care with their health in every aspect, and hearing should be treated no differently than any other. Being certified and trained to prescribe and fit a hearing device to each individual person's hearing loss is CRUCIAL for their success and quality of life. If the board for hearing specialists is eliminated, people will have limited access to this type of quality care which could result in them being fit improperly. Being under amplified or over amplified are both very real possibilities which can result in further damage to a person's hearing, or lack of quality in their daily life.

I finish by urging you to stop the elimination of the Board of Hearing Specialists. You, a friend, or a loved one, may find yourself in a hearing booth in need of help. When that day comes, you know that having a licensed, trained and fully certified health care professional would make you feel like you have trust in the care you are receiving. Hearing healthcare should NOT be something that you can order in the mail. Hearing healthcare should NOT be something you are afraid of. Hearing healthcare should NOT be taken so lightly that just anyone can do it.

HEARING HEALTHCARE SHOULD BE PERFORMED BY FULLY LICENSED AND CERTIFIED SPECIALISTS AND NO ONE ELSE.

Thank you for your time, and I look forward to the right decision being made to put the health and well-being of our community members first, and keeping the Board of Hearing Specialists in tact.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

"Train people well enough so they can leave, treat them well enough so they don't want to"

From:

To:

bcrccomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Bcc:

Subject: Licensing Deregulation

Date: Fri Sep 01 2023 09:42:14 CDT

Attachments:

I am writing in opposition to the deregulation of licensing for Hearing Instrument Specialists in Iowa.

I am a Hearing Care Professional and have been working with people with a hearing loss for over 15 years.

One of the major problems I see with deregulating this profession is that people will not know who they are dealing with when they reach out for help.

Has this person any idea of what to look for when they test the hearing or even look in the person's ears prior to testing? How long have they been "in the business".

I have worked with many consultants, and I know of cases where lives were saved. I am not exaggerating, based on test results people were referred to a doctor and in two cases brain tumors were discovered. How will that still happen when anyone can open an office to sell aids without having gone through the licensing procedure?

Ask yourself, would you buy glasses from someone other than a licensed optician?, give birth helped by your someone who has always just wanted to work with babies instead of an OBGYN or trained Midwife? We laugh at people who google symptoms online instead of going to a doctor but with deregulating this profession you are asking people to do just that, not to get a trained licensed professional to diagnose their condition but to leave it up to someone who thinks this might be a good way to earn money.

The hearing instrument specialist is just that, a specialist. They have been trained in what to look for, they have been trained to test and know when something is other than a simple hearing loss and needs to be looked at by an ENT. How can someone who is untrained know what to look for and when to medically refer someone? I feel that deregulating this profession

could lead not only to people having serious conditions ignored but also the elderly falling prey to people who are in it only to make money. With more and more studies being released connecting Alzheimers with hearing loss would you not think that having the best trained professionals doing this job is essential to the well-being of all?

Before deciding to de-regulate I would humbly ask that you look at the licensing procedure, what kind of education does a Hearing Professional go through? You might be surprised to learn what it takes for someone to get licensed and what they must learn to get those HIS letters behind their name.

Final question, if YOU came to the conclusion that you need a hearing test would you go to a non-licensed person for your help or to someone who has been trained to not only test your hearing but also be able to read those results and know if there is something more than a hearing loss going on?

Thank you, I hope you make the correct decision.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Re: Boards and Commissions Review Committee Public Comment
Date: Fri Sep 01 2023 09:42:17 CDT
Attachments: image001.jpg
image002.png
image003.jpg

Boards and Commissions Review Committee,

My name is [REDACTED] and I represent the International Union of Elevator Constructors. I wish to speak during the public comment period on Wednesday, September 6, 2023.

Please confirm receipt of this request.

Thank you and always work safe.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

April 28th 2024---IUEC Safety Stand Down Day

Owner:

[REDACTED]

Filename: image001.jpg

Last Modified: Fri Sep 01 09:42:17 CDT 2023

image001.jpg f
Printed Item: 22
Attachment 1 o

1 of 1221

Owner:

[REDACTED]

Filename: image002.png

Last Modified: Fri Sep 01 09:42:17 CDT 2023

image002.png for
Printed Item: 229 (
Attachment 2 of 3)

SAFE + SOUND



363 of 1221

Owner:

[REDACTED]

Filename: image003.jpg

Last Modified: Fri Sep 01 09:42:17 CDT 2023

image003.jpg

Printed Item: 2

Attachment 3 c



5 of 122

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Deregulation of Licensing Hearing aid Specialists
Date: Fri Sep 01 2023 09:53:33 CDT
Attachments: image.png
image.png
image.png
Outlook-w1ewz51o.png
Outlook-xk3uxalr.png

September 6, 2023

Dear Boards and Commissions Review Committee Subcommittee members,

The Iowa Hearing Association (IHA) and International Hearing Society (IHS) appreciates this opportunity to share with the Boards and Commissions Review Committee (herein referred to as "the committee") our concerns with the August 29, 2023, recommendation to eliminate the Board of Hearing Aid Specialists (herein referred to as "the Board").

The elimination of this Board will result in the unintended consequences of:

- * Limiting/ lowering hearing healthcare access;
- * Loss of licensure;
- * Eliminating consumer protection;
- * Compromised patient safety;
- * Individual complacency;
- * Reducing competition; and
- * Laxed hearing healthcare industry standards.

This is because this Board – consisting of hearing healthcare industry experts- evaluates an

individual's application for licensure and issues a license if the individual meets statutory, regulatory, and board requirements. Additionally, the Board promulgates regulations to ensure consumer protections from fraud and abuse and educational standards that aligned with current practices to best serve Iowa's hearing-impaired citizens. Furthermore, this Board investigates complaints about unprofessional conduct.

Eliminating this Board may be interpreted by the U.S. Food and Drug Administration (FDA) as eliminating the ability of licensed hearing aid specialists to order the use of prescription hearing aids. Late 2022, the FDA issued regulations recategorized "traditional hearing aids," which have been dispensed by licensed hearing aid specialists for decades, as "prescription medical devices," which must be "prescribed or ordered the use of" by a licensed hearing care professional; 21 C.F.R. § 801.109. Prescription hearing aids require a written or oral authorization from a practitioner licensed by law to administer the device (C.F.R. §801.109).

The practice of ordering, selling, dispensing, and fitting prescription hearing aids is a complex process that, generally speaking, includes the testing of a patient's hearing, programming their patient's prescription hearing aid to meet their hearing need, and ensuring that it internally aligns with the eardrum and is comfortable; an individual's hearing is as unique as their fingerprint.

To ensure patient safety and efficacy, licensed hearing aid dispensers must possess and maintain highly technical skills and clinical knowledge. This is achieved through the licensing process, which requires focused study and hands-on training with a licensed professional, and competency testing to ensure they meet high standards to provide safe and effective hearing health care to their patients. An improper fit or setting can harm a person, and even damage their hearing further. Iowa's hearing-impaired patients should be assured that their hearing healthcare professional is properly qualified, is held to high standards for practice, and maintains education in this field. They should not expect or rely on hearing aid specialists to police themselves. Hearing aid specialists may be members of IHA and/or their national professional association or may pursue certification from the National Board for Certification in Hearing Instrument Sciences (NBC-HIS). However, none of these bodies has the legal authority to enforce or prosecute inappropriate practices.

According to the Centers for Disease Control (CDC) 6 percent (over 186,000) of Iowa's residents have a hearing disability. This is not just an older adult population's health concern. Younger people are also at risk of hearing loss, with the CDC estimating that about a fifth of Americans 30 and under have had their hearing impaired.

Hearing loss can affect a person in three main ways:

- * Fewer educational and job opportunities due to impaired communication.
- * Social withdrawal due to reduced access to services and difficulties communicating with others.
- * Emotional problems caused by a drop in self-esteem and confidence.

Additionally, recent research from Johns Hopkins reveals that hearing loss is also linked with

walking problems, falls, and even dementia. The research found that mild hearing loss doubled dementia risk, moderate loss tripled risk, and people with a severe hearing impairment were five times more likely to develop dementia.

It is for these reasons that it is paramount that Iowa maintains the Board of Hearing Aid Specialists.

We are happy to answer any questions on this issue or any others related to hearing aid dispensers. Please contact the President of the Iowa Hearing Association, Cory Chad Popelka, BC-HIS at cpopelka@mefrasier.com [REDACTED] or IHS' Manager of Government Affairs, Christine Seitz, at cseitz@ihsinfo.org or [REDACTED].

Respectfully.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] in 1951, IHS represents hearing aid dispensing professionals worldwide, including hearing aid dealers and dispensers (known federally as hearing aid specialists), dispensing audiologists, and dispensing physicians. Hearing aid dealers and dispensers dispense about half of hearing aids delivered in the public market and operate in both urban and rural areas. IHS promotes and maintains the highest possible standards for its members in the best interests of the hearing-impaired population they serve by conducting programs in competency accreditation, testing, education, and training, and encourages continued growth and education for its members through advanced certification programs.

[REDACTED]



“Dream Big, Make Plans, Smash Goals!”

Owner:

[REDACTED]

Filename: image.png

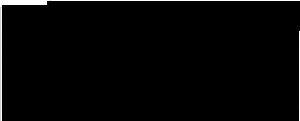
Last Modified: Fri Sep 01 09:53:33 CDT 2023

Owner:

[REDACTED]

Filename: image.png

Last Modified: Fri Sep 01 09:53:33 CDT 2023

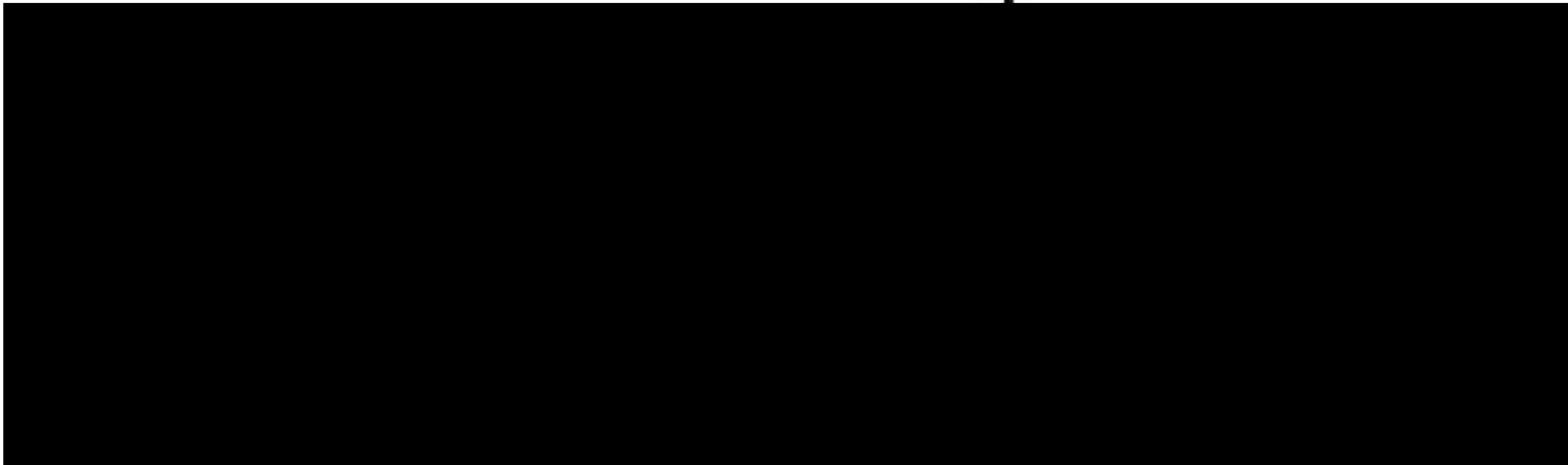


Owner:

[REDACTED]

Filename: image.png

Last Modified: Fri Sep 01 09:53:33 CDT 2023



Owner:

[REDACTED]

Filename: Outlook-w1ewz51o.png

Last Modified: Fri Sep 01 09:53:33 CDT 2023



Owner:

[REDACTED]

Filename: Outlook-xk3uxalr.png

Last Modified: Fri Sep 01 09:53:33 CDT 2023



From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: BCRC Public Comment
Date: Fri Sep 01 2023 09:56:04 CDT
Attachments: BCRC Public Comment- CIDQ 9.1.2023.pdf
image001.jpg
image002.jpg
image003.jpg
image004.jpg
image005.jpg

Hello,

Please find attached public comment from the Council for Interior Design Qualification regarding the Boards & Commissions Review Committee's August 29 subcommittee recommendations. I can be reached at the phone number and email addresses below and would be happy to answer any questions committee members might have.

Thank you.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

ADMINISTRATORS OF THE NCIDQ EXAMINATION

www.cidq.org

CIDQ is working a modified summer work schedule. The office will close at 12pm ET each Friday between May 26 – September 1, 2023.

This email has been scanned for email related threats and delivered safely by Mimecast.
For more information please visit <http://www.mimecast.com>

Owner:

[REDACTED]

Filename: BCRC Public Comment- CIDQ 9.1.2023.pdf

Last Modified: Fri Sep 01 09:56:04 CDT 2023



September 1, 2023

RE: Iowa Boards and Commissions Review Committee Recommendations

My name is [REDACTED], Director of Government Affairs for the Council for Interior Design Qualification (CIDQ). I write in response to the Boards & Commissions Review Committee's August 29 recommendation to eliminate the Iowa Board of Interior Design. Due to the impact on the health, safety, and welfare of the public, and CIDQ's own lack of involvement in disciplinary and enforcement functions at the state level, we believe the interior design profession is best overseen by a board of subject matter experts in the profession. This model is how design professions are regulated nationwide, and we recommend that framework be maintained and believe it can be made more efficient through a multi-disciplinary board composition.

Rationale for the subcommittee's recommendation has pointed to the national NCIDQ certification examination for the interior design profession, which is utilized as the prerequisite for registration in the state of Iowa. Concerning any role in protecting the public health, safety, and welfare as a policing or investigatory party in the state, CIDQ's investigatory and/or enforcement role is limited solely to issues related to the administration of our exam such as cheating, question harvesting, etc. Our organization simply does not have the capacity nor directive to oversee the practice of interior design in US jurisdictions and serve the public's interests in the way that a state board does. Specifically, we have no process for reporting, investigating, or sanctioning incompetent practice by individuals who have passed our exam. As in every other regulated jurisdiction, and as with most other professions, we look to the state board to fulfill that function, as it is doing today.

The committee also notes the lack of complaints and disciplinary instances among Registered Interior Designers over the last several years. Just this year, the Iowa Legislature passed [SF 135](#) with overwhelming bipartisan support, which expanded the state's interior designer registration to include the ability to stamp and seal nonstructural construction plans for permitting. Iowa's representatives have affirmed the interior design profession's impact on public safety and the importance of its regulation and have provided practitioners the ability to practice independently. With that capability, and the potential for risk to public safety that exists with it, enforcement and disciplinary capacity administered by subject matter experts in the profession will be more critical than ever before.

The Interorganizational Council on Regulation, comprised of the four design credentialing organizations, [uniformly supports](#) the continued regulation of all design professions. CIDQ suggests that state boards are the best framework to administer such regulation and urge the Board and Commissions Review Committee to recommend maintaining some form of subject matter expert- led oversight of the interior design profession. While a standalone board would be the most effective method of oversight, a multi-disciplinary board overseeing one or more design professions would be an efficient framework that would still offer public protection. Multi-disciplinary boards are a common framework among states; 15 states currently have joint boards that oversee several design professions.

Thank you for the opportunity to offer these comments. I am happy to be a resource to the Committee; any questions can be directed to me at [REDACTED]

**225 Reinekers Lane, Suite 210, Alexandria, VA 22314
202-721-0220**

Owner:

[REDACTED]

Filename: image001.jpg

Last Modified: Fri Sep 01 09:56:04 CDT 2023

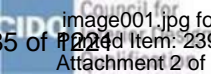


image001.jpg fo
5 of 224d Item: 239

Attachment 2 of

Owner:

[REDACTED]

Filename: image002.jpg

Last Modified: Fri Sep 01 09:56:04 CDT 2023



Owner:

[REDACTED]

Filename: image003.jpg

Last Modified: Fri Sep 01 09:56:04 CDT 2023



Owner:

[REDACTED]

Filename: image004.jpg

Last Modified: Fri Sep 01 09:56:04 CDT 2023



Owner:

[REDACTED]

Filename: image005.jpg

Last Modified: Fri Sep 01 09:56:04 CDT 2023



From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: URGENT Board of Athletic Training Elimination
Date: Fri Sep 01 2023 10:02:39 CDT
Attachments:

To whom it may concern,

I am emailing in response to the recent discussions of the potential to eliminate the Board of Athletic Training for the State of Iowa. I believe this would be an egregious mistake. Maintaining a state licensure benefits all and negatively affects none. Having a state license ensures properly trained and educated individuals that are taking continuing education are the ones that are caring for individuals. The Board of Athletic Training helps provide proper scope of practice guidance and protects the public from untrained persons. Every state (except California which has pending legislation) and Washington D.C. requires licensure for Athletic Trainers, demonstrating the importance. Eliminating regulation will lead to the reversion of Athletic Training practice in the state of Iowa where anyone could serve as the "Athletic Trainer" at their place of employment as the employer saw fit.

Athletic Training is a healthcare profession and we as Athletic Trainers are responsible for the health and wellbeing of those at the institutions we work at as well as to the general public.

As an Athletic Trainer we provide a multitude of medical services in many different types of settings including traditional sports setting, public health and safety, occupational health, and the armed forces to name a few. Having a Board of Athletic Training and maintaining a license helps provide the highest level of patient protection for public safety and is the standard form of regulation for health care professionals. Athletic trainers are included under the allied health professional's category, as defined by the U.S. Department of Health and Human Services (HHS) and can be assigned NPI numbers. The American Medical Association also recognizes athletic training as an allied health care profession. We as athletic trainers provide a variety of services including first aid, injury evaluation, therapeutic intervention and rehabilitation of injuries and medical conditions, health and wellness promotion and education, injury prevention, and administrative tasks. Often times athletic trainers are the first or only health care provider on site when a medical emergency occurs and provide emergent care for individuals as well saving countless lives in the process

To become an Athletic Trainer one must obtain an advanced degree from an Accredited Institution with a very specific and rigorous coursework and hundreds of hours of clinical training to become eligible for the Board testing at a National level. We have national regulation

via this national board exam to initially become credentialed to practice but, as you know in many other areas for professional organizations, it is the States that are ultimately responsible for the adherence to and maintenance of educational competency via Licensure and Board regulation. We MUST have a standard of practice and system of vetting applicants or current licensees, or we will be heading to the unregulated randomness as seen in, and only in California which again has pending legislation.

I fully understand the streamlining and reduction of governmental burden in some areas and that the task of the boards and Commissions Review is great but reduction of regulation of Athletic Training which is a profession that provides healthcare to athletes and other populations in the state cannot be part of this. Additionally, this proposed reduction will not affect cost-saving measures as the Board of Athletic Training operates without funding from the State as the members are volunteers and meet virtually.

I implore you to support our efforts to maintain our Licensure Board as is, without modification.

There is no need for response, however if you choose to I would be happy to assist in any way I can.

Thank you for your time,

[Redacted signature]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Elimination of the Board of Hearing Aid Specialists
Date: Fri Sep 01 2023 10:02:54 CDT
Attachments:

To Whom it May Concern,

I have been made aware that there is a proposal to eliminate the Board of Hearing Aid specialists. I think that this proposal is a terrible idea.

This board is in place to regulate who is able to work with those who need hearing care, and is an essential component of this industry as it ensures that hearing aid specialists are licensed, trained, and BACKGROUND CHECKED to be sure they deliver proper care and continued care. Without this board, it would open up a whole new window for those who prey on the demographic of people who need hearing care the most; our parents, grandparents, and children. It is important that our families receive hearing care from licensed professionals. I work in the hearing care industry, and eliminating the board would ultimately result in the closure of my small clinic that I currently work at. I and several others like myself would lose their jobs.

Thank you for your time and for reading my email. It is important to me that the Board of Hearing Specialists stays in place.

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Public Comment - Chiropractic Board
Date: Fri Sep 01 2023 10:04:19 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * The proposed combination combines the board into professions that compete in the marketplace. This opens the door for potential conflicts of interest amongst board members who may favor one profession over another.
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: AT Licensure Must Remain!
Date: Fri Sep 01 2023 10:04:55 CDT
Attachments:

To Whom It May Concern:

My name is [REDACTED] and I am the President of the Illinois Athletic Trainers Association and I am writing to have you reconsider discontinuing licensure for athletic trainers in the state of Iowa. As you know, licensure is the highest level of regulation available to healthcare providers and helps to protect those providers and the patients that they serve. Every state and Washington D.C. require licensure, with the exception of Hawaii (registration only) and California (has pending legislation).

Athletic trainers are allied healthcare professionals that specialize in the prevention, diagnosis and intervention of emergent, acute and chronic medical conditions involving impairment, functional limitations and disabilities. Having a healthcare provider with these skills and responsibilities to go unregulated can have drastic effects. Not only would this affect the health and safety of thousands of student athletes across your state, but also those that benefit from athletic training services in the performing arts, public safety, occupational health, and the armed services. Licensure is the standard for healthcare professionals nationwide and removing it from athletic trainers in Iowa is a step backward. You should not want unqualified individuals acting as athletic trainers and providing care when they are not trained to do so. Licensure protects patients.

I hope you take these areas into consideration and realize licensure is a must for any healthcare provider. The approximately 1100 athletic trainers are relying on you to maintain this level of protection for their profession and their patients. I strongly urge you to keep licensure for athletic trainers in Iowa in place.

Thank you for your time.

In Service,

[REDACTED]



From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic Training Licensure Board
Date: Fri Sep 01 2023 10:08:07 CDT
Attachments:

To whom it may concern:

My name is [REDACTED]s, and I am a resident of Dubuque, a parent of a child who participates in sports, an athletic trainer, a Professor of Athletic Training and the Graduate Athletic Training Program Director at Loras College.

I am reaching out to comment on the proposed changes to committees/boards in our state and particularly the recommended elimination of the Board of Athletic Training. I cannot begin to state how alarming this is for the safety of athletes in this state. Athletic trainers play an integral role in the safety of youth and adult athletes playing sports in our state daily. The presence of athletic trainers allows coaches to coach and allows a trained healthcare provider to prevent, evaluate, treat, and rehabilitate injuries. Additionally, if an emergency occurs, athletic trainers are present to provide the necessary immediate care and activate an emergency action plan and EMS response. Finally, and more specifically, with concussion care being such an important and vital topic, having trained professionals who can diagnose and treat head injuries accurately and effectively is necessary for safe participation in sports.

There are many stories of the importance of athletic trainers, too many for this one email, but I will share a few. [REDACTED], who graduated from Pleasant Valley High School and played football at Iowa, was working out in Bettendorf and collapsed. An athletic trainer's quick and effective response to his cardiac issue is why he is still alive today. Last year, athletic trainers at two different high schools in Iowa accurately diagnosed internal organ damage and saved their athlete's lives. Athletic trainers at a university in Iowa saved the life of a basketball manager during practice a few years ago and saved an athlete from paralysis last year by properly treating a cervical spine injury. I could go on and on with more stories. In each case a trained and licensed healthcare professional was there, on site and because of this, a positive outcome resulted. Having to call for medical help or having someone without the right qualifications present could have led to a poor or life altering outcome for athletes and their families. Athletic trainers are the professionals that are trained to be on site and take care of these injuries.

If the licensing system for athletic trainers was removed, it would be up to the schools who are hiring athletic trainers determine the viability of an individual to be an athletic trainer. That means the schools and often athletic administrators or coaches who are not trained in healthcare will be charged with determining who is qualified to provide healthcare. While I have the utmost respect for athletic administrators and coaches, they are not the best individuals to hire a healthcare provider. Overall, this change hurts the public and makes participation in sport less safe.

Additionally, by removing the licensure system from our state, we would rely only on the Board of Certification (BOC) exam as a way of assessing the quality of an athletic trainer. While this exam is designed to protect the public by screening recent graduates for basic knowledge and skill, a means for our state to monitor athletic trainers and ensure continuing education is necessary for public protection as best practices will naturally evolve over an athletic trainer's career.

The move to eliminate the Board of Athletic Training is a backward movement in comparison to the rest of the country. Across the US, 49/50 states have some form of regulation of the profession athletic training. The one remaining state has an active bill which would require regulation of the practice of athletic training. Licensure is required in 47/50 states. Thus, by moving away from licensing athletic trainers in our state, we would be moving in the opposite direction of everyone else and in this case, being different is not a good thing.

Finally, as a parent, I want my child to be safe when playing sports. I know injuries will happen, but I expect the school or organization to have a properly trained individual on site to provide care. Removing the Board of Athletic Training and licensure system takes away an important and effective means to ensure qualified individuals are providing that healthcare.

Thank you for the consideration of these comments and I ask that you reconsider the elimination of the Board of Athletic Training.

Thanks,



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

CONFIDENTIALITY NOTICE: This email, including any attachments, is the property of Loras College. The information may be legally privileged and/or confidential and is intended solely for the use of the addressee. If you are not the intended recipient be advised that any unauthorized disclosure, copying, distribution or use of the contents herein is strictly prohibited. If you have received this message in error, please notify the sender immediately and destroy all electronic and hard copies of the communication, including attachments.

From:

[REDACTED]

To: BCRCComments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Bcc:

Subject: Hearing Instrument Specialist deregulation

Date: Fri Sep 01 2023 10:23:53 CDT

Attachments:

To whom it may concern,

I recently was notified about the possible deregulation of licensed hearing instrument specialist in Iowa and frankly I am appalled. There is a lot to proper fitting, testing, programming, counseling that goes into taking care of a person's hearing health. This is not a retail hand them the box of hearing aids product. If you have ever known anyone with hearing loss it is quite frustrating for the patient and can be particularly debilitating emotionally if not handled with the utmost professional education and care. These people do not want to be sold a product. They need a licensed qualified professional to determine their type of loss before fitting. On some cases it takes an expert in the field to uncover other possible medical issues so we can refer them to a Dr. That is precisely why we are licensed. We know what we are doing. To let any unlicensed fly by night used car salesman fit hearing aids would be an ethical disaster. People want help long term guidance with their hearing health by licensed professionals, not unqualified fit them and forget them salespeople. The question you must ask yourself would be if this was your family member what would think would be in their best interest? You know the answer deep in your heart. Please think carefully and understand that deregulation of our licensed hearing instrument specialists in our great state is not the answer.

Thank you

From:

[REDACTED]

To:

BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

[REDACTED]

Subject:

Keeping the board and licensing intact.
[REDACTED]

Licensing is very important in this field. As someone who has been in the medical field for over 10 years, you want and need individuals who can perform these skills and have the knowledge to safely treat and care for patients. You take licensing away; you take individual's trust and their peace of mind away.

I want to know whoever I go to, without a doubt, knows what they are doing, and having that licensing proves to me that they are serious about it, that they worked hard to achieve it, and that they wanted to make sure they were safely taking care of others.

These are huge reasons why licensing is so crucial for Hearing Specialists and the individuals that come to us for help.

Thank you!

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From:

[Redacted]

To: BCRCComments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Bcc:

Subject: Deregulation of licensing for Hearing Instrument Specialists in Iowa

Date: Fri Sep 01 2023 10:35:21 CDT

Attachments:

I am writing to you in opposition of deregulation of licensing for Hearing Instrument Specialists in Iowa, not only as an employee of a hearing aid company but as a concerned citizen with friends and family wearing hearing aids. We deal with a wide range of hearing loss in our office. A person with hearing loss knows they can't hear but has no idea the extent of it and/or knows what to do about it. In fact, they may not need hearing aids at all and need to be referred to an ENT. Allowing unlicensed providers with little or no knowledge to sell hearing aids is not a good idea. Our specialists go through extensive training and continuing education to give patients the very best outcome they can. Improperly fitting an individual can cause even more damage to the individual's hearing and/or miss underlying conditions. We, as an office who specializes in hearing loss, fit the patient with exactly what they need for the appropriate hearing loss and continue to give them the customer service they deserve for the lifetime of their hearing aids. Let's face it, the majority of users are elderly and need to be guided by professionals who know what's best for the individual.

Thank you for your time.

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Iowa Board of Athletic Training
Date: Fri Sep 01 2023 10:38:12 CDT
Attachments:

Hello,

I am writing as a certified and licensed athletic trainer in response to the recent recommendation to eliminate the Board of Athletic Training in the State of Iowa. As a healthcare professional and educator for a professional program, there are many reasons this decision would not only hinder the profession, but cause harm to the public.

At the moment, athletic trainers have to be certified and licensed to practice in the State of Iowa. This means that there are standards for them to practice and standards that they must abide. If these are not required, anyone can claim that they are an athletic trainer without the proper training. Athletic trainers save lives. We are trained to save lives and to provide the needed care during those emergencies and to prevent them from even occurring. Taking away the Iowa Board of Athletic Training will be detrimental to current patients and future patients.

We are working to push the profession forward and continue to provide proper healthcare to all our patients, and this decision would be a major setback for not only athletic training, but healthcare as a whole.

Thank you for your time.

[REDACTED]

From:

To:

BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Bcc:

Subject: Hearing Instrument Specialist Deregulation

Date: Fri Sep 01 2023 10:40:15 CDT

Attachments:

I am writing in opposition to the deregulation of licensing for Hearing Instrument Specialists in Iowa.

I am a Patient Care Coordinator and have been working with people with a hearing loss for over 20 years.

One of the major problems I see with deregulating this profession is that people will not know who they are dealing with when they reach out for help.

Has this person any idea of what to look for when they test the hearing or even look in the person's ears prior to testing? How long have they been "in the business".

I have worked with many consultants, and I know of cases where lives were saved. I am not exaggerating, based on test results people were referred to a doctor and in two cases brain tumors were discovered. How will that still happen when anyone can open an office to sell aids without having gone through the licensing procedure?

Ask yourself, would you buy glasses from someone other than a licensed optician?, give birth helped by your someone who has always just wanted to work with babies instead of an OBGYN or trained Midwife? We laugh at people who google symptoms online instead of going to a doctor but with deregulating this profession you are asking people to do just that, not to get a trained licensed professional to diagnose their condition but to leave it up to someone who thinks this might be a good way to earn money.

The hearing instrument specialist is just that, a specialist. They have been trained in what to look for, they have been trained to test and know when something is other than a simple hearing loss and needs to be looked at by an ENT. How can someone who is untrained know what to look for and when to medically refer someone? I feel that deregulating this profession could lead not only to people having serious conditions ignored but also the elderly falling prey to people who are in it only to make money. With more and more studies being released connecting Alzheimers with hearing loss would you not think that having the best trained professionals doing this job is essential to the well-being of all?

Before deciding to de-regulate I would humbly ask that you look at the licensing procedure, what kind of education does a Hearing Professional go through? You might be surprised to learn what it takes for someone to get licensed and what they must learn to get those HIS letters behind their name.

Final question, if YOU came to the conclusion that you need a hearing test would you go to a non-licensed person for your help or to someone who has been trained to not only test your hearing but also be able to read those results and know if there is something more than a hearing loss going on?

Thank you, I hope you make the correct decision.

Thanks!!

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc: [REDACTED]
Subject: Chiropractic Board proposed Merge
[REDACTED]

Dear Board and Commission Review Committee,

I am writing to express my public concern that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board's knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Also, I would have been there in person to express this concern, but the short notice left me unable to reschedule my patient load.

Sincerely,

[REDACTED]

From: [REDACTED]
[REDACTED]
[REDACTED]

To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>; todd.taylor@legis.iowa.gov
<todd.taylor@legis.iowa.gov>; art.staed@legis.iowa.gov
<art.staed@legis.iowa.gov>

Cc: [REDACTED]
[REDACTED]

Bcc:

Subject: Board of Athletic Training and Licensure

Date: Fri Sep 01 2023 11:05:14 CDT

Attachments: image001.png

To whom it may concern,

My name is [REDACTED] and I am an Athletic Trainer at a local high school in the state of Iowa. I have recently been made aware of a proposal to reorganize and potentially eliminating 140+ Advisory Boards and Commissions including eliminating the Board of Athletic Training and our licensure. I wanted to take a moment and reach out to express my concerns for this decision not only as an Athletic Trainer but as a community member.

This decision would impact more than just high school athletes and I think it is important to take into consideration the sizeable impact this would have for all of the communities across Iowa. Athletic Trainers are board certified healthcare providers who specialize in the prevention, diagnosis and intervention of emergent, acute and chronic medical conditions involving impairment, functional limitations and disabilities. Having the additional requirement of a licensure provides the highest level of patient protection for the public's safety and is the standard form of regulation for all healthcare providers. Athletic Trainers are included under the allied health professions as defined by the U.S. Department of Health and Human Services and are recognized as an allied health care profession by the American Medical Association. Athletic Trainer license are required to practice in 47 states and the District of Columbia; New York and California currently have a bill awaiting licensing requirements while Hawaii only requires registration. Strides are being made forward in the remaining to states to require the highest level of care across the nation and Iowa should not be considering taking steps backwards. Instead I fully believe we should be making forward movement by requiring certified and licensed Athletic Trainers in every secondary setting and be recognized by insurance agencies to be able to bill. This would also contradict other bills that were currently signed into action such as the Concussion bill that was signed into place in 2019.

While Athletic Trainers are most notably recognized working with the athletic population we

actually operate and specialize across multiple settings to which this action would affect. Athletic Trainers work with different athletic populations, occupational and industrial settings, performing arts, in physician offices, with the military and different public safety figures including police and fire. Not only would this be taking away opportunities from athletes to participate in sports but would also impact our military, traditional healthcare facilities and the workforce in communities across the state of Iowa. For a lot of kids Athletic Trainers are the only form of healthcare they have free, unlimited access to due to SES. Beyond the healthcare aspect, kids who would potentially be participating in criminal activities are participating in after school activities, this decision could impact these children if they do not have access to someone to help keep them physically in the game and at practices. On the flip side of things this would also impact workers that are suffering from injuries and no longer have the access to the treatments they need.

From a liability standpoint, removing the licensure requirement and the Board of Athletic Trainers would increase safety risks to everyone who currently utilize our services. This would give more access for people without training to call themselves Athletic Trainers. This happens regularly from other professions such as Personal Trainers, chiropractors and Physical Therapist who work and operate beyond their scope of practice and as an Athletic Trainer or call themselves such when they are not which puts those patients at risk of further injury or possibly death. If you question the viability and importance of Athletic Trainers please look at the Damar Hamlin case which because of Athletic Trainers responding within 7 seconds and activating our Master's level education and training within 24 seconds he is still here today and able to play sports. There are multiple articles online addressing Athletic Trainers (trainers as we are poorly portrayed) saving young athletes by being onsite, utilizing our training and coming to action. Unfortunately there are also articles showing what can happen if the appropriate personnel are not present.

We have more requirements for education then some practices who are have greater recognition and more requirements than Physical Therapist for continuing education, emergency care and maintaining CPR certifications. This choice which may come from under recognition or education about what Athletic Trainers truly do not only would impact multiple people across Iowa but also does not make sense from the training required and we how we operate in comparison to other practices. Furthermore, one reason that was addressed of why this was taken into consideration was to cut spending and save tax payer's dollars and this board is a voluntary board which would not save any money at all. I hope you take everything into consideration and keep the Board of Athletic Trainers and our licensure going forward. I would be happy to address any further questions or concerns. Thank you for your time.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Owner:

[REDACTED]

Filename: image001.png

Last Modified: Fri Sep 01 11:05:14 CDT 2023



image001.png for Printed Item: 257

Attachment 1 of 1

Page 415 of 1221

Wiley

PHYSICAL THERAPY

From:

To:

bcrccomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Subject:

Athletic Training Licensure

To whom it may concern,

Changing the licensure for athletic training would be a detriment to the state of Iowa and the athletic training profession across the nation. You would then be only 1 of 2 states that do not have any regulation in place for athletic training. You would put student-athletes at the high school, club, and collegiate level, public officers, professional athletes, and more at risk of legislation were to change.

Please consider the health and safety of Iowa citizens before making any decisions.

Best,

[Redacted signature]

From:

[Redacted]

To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Bcc:

Subject: Board & Commissions Review Committee - Public Comments

Date: Fri Sep 01 2023 11:12:20 CDT

Attachments: image001.jpg

I would like to make a brief comment at next Wednesday's meeting in support of keeping the Elevator Safety Board. I plan to attend the September 6, 2023 meeting at 12 PM.

Thank you,

[Redacted]

[Redacted]

[Redacted]

Owner:

Filename:

image001.jpg

Last Modified:

Fri Sep 01 11:12:20 CDT 2023

image001.jpg for Printed Item: 260 (Attachment 1 of 1)



ELEVATORS | COMPONENTS | MODERNIZATION | SERVICE

Page 419 of 1221

From:

To:

BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Subject:

License Deregulations

To whom this may concern,

I am writing this letter to oppose the decision of deregulating the Iowa licensing practice. In my few years of being a license Hearing Aid Specialist, I've encountered multiple cases of something being medically wrong with a patient, that may be causing some form of hearing loss. With common courtesy and professionalism, I would have them sent out to seek a higher medical opinion before going over any hearing treatment options. There are crucial things we are taught to look out for; for example, warning signs of ongoing infection, bone to air score indifferences and many more.

I do believe in keeping a qualification of a license to dispense proper hearing amplification is highly necessary for professional hearing care treatment. I was fortunate to learn the many obstacles of fitting individual hearing losses from proper receiver strength, dome/sleeve or hearing mold fittings and tube style for draining ears. With proper education and the high standard of being licensed, there is a sense of relief when a patient or client knows they have someone who has a form of certification with a medical issue. In all, I highly stand for keeping the same process of having a license to practice the correct way of dispensing hearing instruments and alleviating any future malpractices.

Sincerely,

[Redacted Signature]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>; adam.zabner@legis.iowa.gov
<adam.zabner@legis.iowa.gov>; [REDACTED]
[REDACTED]; janice.weiner@legis.iowa.gov
<janice.weiner@legis.iowa.gov>
Cc:
Bcc:
Subject: Please maintain state Board of Athletic Training; Keep Athletic Training
Licensure
Date: Fri Sep 01 2023 11:16:10 CDT
Attachments: image001.jpg

Dear Board and Commissions Committee, and Senator Janice Weiner,

I am emailing you to reconsider the recommended elimination of the state requirement for athletic training licensure and the state Board of Athletic Training. State licensure protects our patients and ensures us that our athletic training staff are properly trained, undergoing continuous education requirements, and monitored. The board protects the scope and practice guidelines for our staff under the University of Iowa.

Athletic trainers are healthcare professionals who specialize in the prevention, diagnosis and intervention of emergent, acute, and chronic medical conditions involving impairment, functional limitations, and disabilities. Our athletic training staff have graduate degrees to specialize as a healthcare provider to provide this care to our patients.

Licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS) and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Owner:

[REDACTED]

Filename: image001.jpg

Last Modified: Fri Sep 01 11:16:10 CDT 2023

image001.jpg for Printed Item: 26:

Attachment 1 of 1)

Page 425 of 1221

HEALTH VENTURES

From: [REDACTED]
[REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>; adam.zabner@legis.iowa.gov
<adam.zabner@legis.iowa.gov>; adam.zabner@gmail.com
<adam.zabner@gmail.com>; janice.weiner@legis.iowa.gov
<janice.weiner@legis.iowa.gov>
Cc:
Bcc:
Subject: Please maintain state Board of Athletic Training; Keep Athletic Training
Licensure
Date: Fri Sep 01 2023 11:17:56 CDT
Attachments:

"Dear Board and Commissions Committee, and Senator Janice Weiner,

I am emailing you to protest the recommended elimination of the state requirement for athletic training licensure and the state Board of Athletic Training. State licensure protects our patients and ensures us that our athletic training staff are properly trained, undergoing continuous education requirements, and monitored. The board protects the scope and practice guidelines for our staff under the University of Iowa.

Athletic trainers are healthcare professionals who specialize in the prevention, diagnosis and intervention of emergent, acute, and chronic medical conditions involving impairment, functional limitations, and disabilities. Our athletic training staff have graduate degrees to specialize as a healthcare provider to provide this care to our patients.

Licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS) and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Merging of Licensure Boards- PLEAE DO NOT ALLOW
Date: Fri Sep 01 2023 11:22:35 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc: [REDACTED]
Subject: Board Consolidation
[REDACTED]

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions.
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]
[REDACTED]

From:

[REDACTED]

To:

BCRCcomments@iowa.gov
<brcrccomments@iowa.gov>

Cc:

[REDACTED]

Subject:

Licensure Deregulation

[REDACTED]

I have been a Hearing Instrument Specialist for 7 years and enjoy taking care of patients and families. I am writing this in regards as the state wanting to allow just anyone to fit hearing aids. In my opinion this would be just like giving the ok to have anyone just fit glasses. We are not just helping patients hear but also helping with the patients' health. We take great pride in giving patients hearing plus the assurance that their ear health has been taken care of.

Over the years I have sent many patients out to ENT because I have found issues with patients' ears that were more than just a hearing loss. Doing the right test and looking in patients' ears helps us to take the appropriate actions on what is best for our patients. If you let just anyone fit hearing aids, they will miss the HEALTH part of the ear. They will not be trained to test properly, know what health conditions to look for in patients' ears, and will not know how to fit hearing aids. Why ?? Because they have not gone thru proper training and testing to know anything about the ears.

So, I am asking you to take into consideration all of our experience, schooling, and our fight to help patients hear better before making the drastic decision. I would not want my family members to go to any one that is not licensed to buy hearing aids, glasses, or any other medical device.

Thank you,
Tiffany

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>; adam.zabner@legis.iowa.gov
<adam.zabner@legis.iowa.gov>; [REDACTED]
[REDACTED]; janice.weiner@legis.iowa.gov
<janice.weiner@legis.iowa.gov>
Cc:
Bcc:
Subject: Please maintain state Board of Athletic Training; Keep Athletic Training
Licensure
Date: Fri Sep 01 2023 11:24:59 CDT
Attachments: Outlook-v40klwux.png

Dear Board and Commissions Committee, and Senator Janice Weiner,

I am emailing you to protest the recommended elimination of the state requirement for athletic training licensure and the state Board of Athletic Training. State licensure protects our patients and ensures us that our athletic training staff are properly trained, undergoing continuous education requirements, and monitored. The board protects the scope and practice guidelines for our staff under the University of Iowa.

Athletic trainers are healthcare professionals who specialize in the prevention, diagnosis and intervention of emergent, acute, and chronic medical conditions involving impairment, functional limitations, and disabilities. Our athletic training staff have graduate degrees to specialize as a healthcare provider to provide this care to our patients.

Licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS) and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.

I believe removing this would be a huge risk and oversight for Iowa. Would you like your loved ones (children, siblings, parents, etc.) being cared for by someone who doesn't meet the standards we have had in place (along with +45 other states). This will only lead to disaster. Please maintain our standards!

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

Owner:

[REDACTED]

Filename: Outlook-v40klwux.png

Last Modified: Fri Sep 01 11:24:59 CDT 2023

Outlook-v40klwux.png for Printed Item: 269 (Attachment 1 of 1)

UNIVERSITY OF IOWA

Page 435 of 1221

HEALTHY VENTURES

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc: david.jacoby@legis.iowa.gov
<david.jacoby@legis.iowa.gov>; zach.wahls@legis.iowa.gov
<zach.wahls@legis.iowa.gov>
Bcc:
Subject: Athletic Training Licensure Board
Date: Fri Sep 01 2023 11:27:02 CDT
Attachments:

To whom it may concern,

My name is [REDACTED] and I am a clinical athletic trainer at the University of Iowa Hospitals and Clinics Orthopedics Department. I am also a resident of Coralville, Iowa, a Board Certified and Iowa Licensed athletic trainer, and a preceptor within the MSAT program at the University of Iowa.

I have been made aware of the possibility that you will be eliminating the Licensure Board, and subsequently, the licensure for Athletic Trainers in the state of Iowa. I am reaching out to comment on these proposed changes to committees/boards in our state. It is alarming to imagine what this would do to the safety of athletes in our state. Athletic trainers play a vital role in the safety of young athletes playing sports in our state on a daily basis, through youth sports to high schools and at the collegiate level.

The presence of athletic trainers allows coaches to coach and a licensed health care providers to prevent, evaluate, treat, and rehabilitate injuries. Additionally, should an emergency occur on the field or playing surface, athletic trainers have training in immediate care and activation of emergency action plans/response. Finally, and more specifically, with concussion care being such an important and vital topic, having trained professionals who can diagnose and treat head injuries accurately and effectively is necessary for safe participation in sports.

If the licensing system for athletic trainers was removed, it would be up to the hiring schools or hospitals to determine the viability of an individual to be an athletic trainer. This means that those who may not have a background or education in healthcare will be charged with determining who is qualified to provide healthcare to our athletes and patients.

By eliminating the licensure system for our state, we would only rely on the Board of Certification (BOC) exam as a way of assessing the quality of an athletic trainer. While this examination is designed to protect the public by screening recent graduates of basic knowledge and skill, we need a means for our state to monitor athletic trainers and ensure continuing education. This is necessary for public protection as best practices evolve over time and without up to date knowledge, the safety of athletes, and even the general public, is

endangered.

Across the US, 49/50 states have some form of regulation of the profession of athletic training. The one remaining state has an active bill that would require regulation of the practice of athletic training. Licensure is required in 47/50 states.

Finally, as an athletic trainer that has worked at the collegiate level, high school level, and now in the clinical setting with occasional outreach, it is vital that we have individuals who are charged with athlete and public safety who are regulated with their licensure to make sure they are up to date on the best practices and latest research for emergency care and patient care.

I urge you to vote against getting rid of the athletic training licensure board.

Thank you for your time.

Best,

A large black rectangular redaction box covering the signature and name of the sender.

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Call to Action: Act Now to Prevent the Elimination of Our Profession
Date: Fri Sep 01 2023 11:47:27 CDT
Attachments:

TO whom it may concern:

I have been a PCC for almost 5 years now and I have seen first-hand how important hearing health is.

I have seen pt come in thinking that a hearing aid would fix their problem of not hearing. That turned out not to be the case. The hearing instrument specialist with her schooling and certificates was able to determine the pt needed to be seen by an ENT to get further evaluation. During the hearing test it was determined that the pt's middle ear was not working. The equipment the hearing specialist uses and is trained on was able to determine the middle ear was not working correctly.

The pt was referred to an ENT who determined the pt had a tumor and needed to be further evaluated. That would not have been possible if the HCS was not properly trained and certified.

Please reconsider the elevation of "The Hearing Board committee".
It's not only hearing, it's your health!

Thank you,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>; adam.zabner@legis.iowa.gov
<adam.zabner@legis.iowa.gov>; [REDACTED]
[REDACTED]; [REDACTED] janice.weiner@legis.iowa.gov
<janice.weiner@legis.iowa.gov>
Cc:
Bcc:
Subject: Please maintain state Board of Athletic Training; Keep Athletic Training
Licensure
Date: Fri Sep 01 2023 11:47:29 CDT
Attachments: Outlook-qq2eoxts.png

Dear Board and Commissions Committee, and Senator Janice Weiner,

I am emailing you to protest the recommended elimination of the state requirement for athletic training licensure and the state Board of Athletic Training. State licensure protects our patients and ensures us that our athletic training staff are properly trained, undergoing continuous education requirements, and monitored. The board protects the scope and practice guidelines for our staff under the University of Iowa.

Athletic trainers are healthcare professionals who specialize in the prevention, diagnosis and intervention of emergent, acute, and chronic medical conditions involving impairment, functional limitations, and disabilities. Our athletic training staff have graduate degrees to specialize as a healthcare provider to provide this care to our patients.

Licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS) and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Owner:

[REDACTED]

Filename: Outlook-qq2eoxts.png

Last Modified: Fri Sep 01 11:47:29 CDT 2023



UNIVERSITY OF IOWA
HEALTH CARE

UI Sleep Solutions

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: REQUESTED ACTION: Opposition to Elimination of Iowa Board of Athletic Training
Date: Fri Sep 01 2023 11:51:50 CDT
Attachments: Outlook-Connect.png
Outlook-Follow.png
Outlook-Like.png
Outlook-photo.png
Outlook-Watch.png
Outlook-Watch.png
Outlook-Watch.png
Outlook-Watch.png

Dear Members of the Boards and Commissions Review Committee,

I hope this email finds you well. My name is [REDACTED], and I am a Licensed Athletic Trainer in the State of Iowa, working for the largest employer of Athletic Trainers in the country, Athletico. I am currently responsible for the oversight of my team of 18 Athletic Trainers in the Des Moines area. I am writing to express my deep concern and strong opposition to the recent consideration of eliminating the Iowa Board of Athletic Training.

The Athletic Training profession is composed of Certified and Licensed Athletic Trainers from professional, collegiate, and high school teams; industries; physician offices; rehabilitation clinics; and every branch of the United State military working together to promote and practice the profession of Athletic Training within the State of Iowa. Athletic Trainers have a long history of providing quality health care for athletes and persons engaged in regular physical activity. They are highly skilled licensed health care professionals who specialize in immediate, acute, and emergency care, examination, assessment, injury prevention, risk management, therapeutic intervention and rehabilitation of injury and illness. We are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS) & also carry National Provider Identifier numbers (NPIs). Lastly, the American Medical Association (AMA) also recognizes Athletic Trainers as an allied health care profession.

The National Athletic Trainers' Association (NATA) represents and supports more than 45,000 members of the Athletic Training profession, including more than 1129 licensed Athletic Trainers in the State of Iowa. Licensure provides the highest level of patient protection for the

public's safety, and it is the standard form of regulation for health care professions. It also ensures clients and employers that an Athletic Trainer is properly trained, taking continuing education, and monitored. The associated Board of Athletic Training helps provide scope of practice guidance & protects the public from untrained persons. There is no expense associated with this Board. The fees that Athletic Trainers pay to renew their license cover all costs and year over year they are consistently in the black.

By eliminating the Board of Athletic Training and subsequent licensing for Athletic Trainers, we risk losing a dedicated group of professionals who are uniquely qualified to address the specialized needs of athletes and active individuals. Their knowledge in injury prevention, emergency response, and rehabilitation techniques is invaluable in safeguarding the health of those who rely on their expertise.

I urge this committee to reconsider this proposal and recognize the indispensable contributions that Athletic Trainers make to the communities of Iowa. Their skills and training are essential components of a comprehensive healthcare system that prioritizes the physical well-being of its citizens.

In conclusion, I stand firmly against the elimination of the Iowa Board of Athletic Training and implore the Board to continue supporting this critical profession. Let us work together to ensure that athletes and active individuals throughout the state continue to receive the highest standard of care.

Respectfully,

[REDACTED]

[REDACTED]

[REDACTED]

This message may contain information that is confidential, privileged, or otherwise protected from disclosure. If this message contains Protected Health Information, its acquisition, transmission, storage and use is protected by HIPAA. If you are not the intended recipient, any review, disclosure, copying, or distribution, of this material is strictly prohibited. If you receive this message in error or are not the named recipient(s), please contact the sender immediately and delete this message. Thank you for your cooperation.

Owner:

[REDACTED]

Filename: Outlook-Connect.png

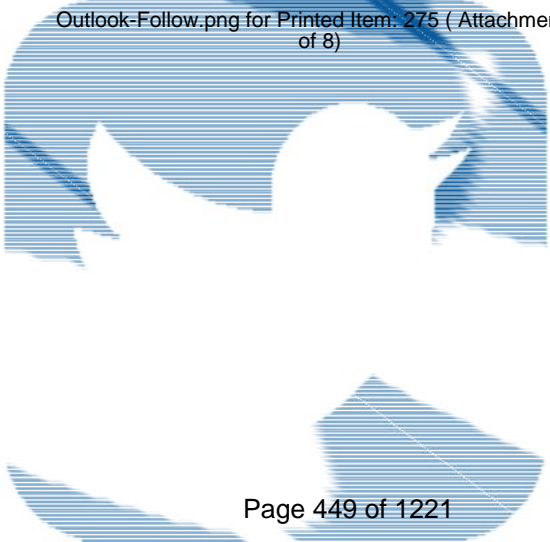
Last Modified: Fri Sep 01 11:51:50 CDT 2023

Owner:

[REDACTED]

Filename: Outlook-Follow.png

Last Modified: Fri Sep 01 11:51:50 CDT 2023



Owner:

[REDACTED]

Filename: Outlook-Like.png

Last Modified: Fri Sep 01 11:51:50 CDT 2023


Owner:

[REDACTED]

Filename: Outlook-photo.png

Last Modified: Fri Sep 01 11:51:50 CDT 2023

Outlook-photo.png for
Printed Item: 275 (
Attachment 4 of 8)



ge 453 of 1221

Owner:

[REDACTED]

Filename: Outlook-Watch.png

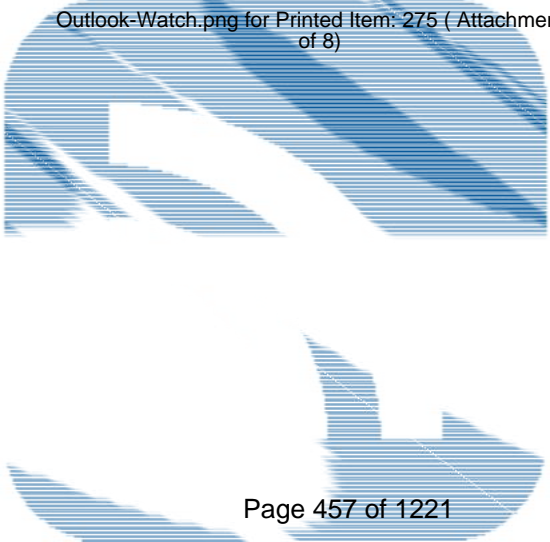
Last Modified: Fri Sep 01 11:51:50 CDT 2023

Owner:

[REDACTED]

Filename: Outlook-Watch.png

Last Modified: Fri Sep 01 11:51:50 CDT 2023



Owner:

[REDACTED]

Filename: Outlook-Watch.png

Last Modified: Fri Sep 01 11:51:50 CDT 2023

YOU Tube

Owner:

[REDACTED]

Filename: Outlook-Watch.png

Last Modified: Fri Sep 01 11:51:50 CDT 2023

From: [REDACTED]
To: BCRCcomments@iowa.gov
<brcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Massage Board merger
Date: Fri Sep 01 2023 11:57:46 CDT
Attachments:

I am contacting you today as an Iowa Massage Therapist for nearly 30 years. I got my license in 1994 and have worked full time in the industry since, all in Iowa.

Since 2008 I have been the owner and operator of Iowa's longest established massage college, Carlson College of Massage Therapy in Anamosa. I know this industry and I am passionate about it.

I am contacting you today regarding the restructuring of Iowa licensing boards, specifically the Board of Massage. As I understand it, there is a proposal to merge our board with Chiropractic, Physical Therapy, Occupational Therapy and Respiratory Therapy. I am contacting you with three key considerations with such a plan. First, I feel at least two professionals from each area of expertise should sit on the newly formed board. This will allow for balanced representation of each profession while not having one person with excessive influence in their profession. Second, in the profession of massage therapy there is a real and critically important issue regarding illegal massage practices. We need this licensing enforcement to continue and be prioritized to protect the public from sexual predators and help to enforce and curtail the horrific acts involved with human trafficking. Human trafficking is something that each board member on the newly formed board will need specific training on to understand and effectively manage.

Lastly, as a small business owner, I get streamlining and budget cuts. They are needed and reasonable. I respect the professions our board may be combined with. I do question the inclusion of Respiratory Therapists. There does not seem to be professional competency overlap. This might make it difficult for the newly formed board to effectively manage this profession.

Please do not hesitate to contact me. I am more than willing to talk in more detail or provide additional insight. In my nearly 30 years in the industry I have learned and experienced a lot.

[REDACTED]

[REDACTED]

[REDACTED]

Thank you!

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Confidential Communication:

This email message and any attachments are intended only for the addressee. This email and any attachments may be privileged, confidential, and protected from disclosure. If you are not the intended recipient, any dissemination, distribution, or copying is expressly prohibited. If you received this email message in error, please notify the sender immediately by replying to this email message or by telephone.

From: [REDACTED]
[REDACTED]
To: BCRCComments@iowa.gov
<bcrccomments@iowa.gov>
Cc: [REDACTED]
Bcc:
Subject: Opposition to Eliminate Board of Hearing Specialists
Date: Fri Sep 01 2023 12:05:48 CDT
Attachments:

Dear Boards and Commissions Review Committee members,

I write to you today, as a licensed hearing aid specialists who provides hearing healthcare services to an increasingly growing population, to express my concern with the Boards and Commissions Review Committee Subcommittee's August 29, 2023, recommendation to eliminate the Board of Hearing Aid Specialists (herein referred to as "the Board").

The elimination of this Board will result in the unintended consequence of:

- Limiting/ lowering hearing healthcare access;
- Loss of licensure;
- Eliminating consumer protection;
- Compromised patient safety;
- Individual complacency;
- Reducing competition; and
- Laxed hearing healthcare industry standards.

This is because this Board – consisting of hearing healthcare industry experts- evaluates an individual's application for licensure and issues a license if the individual meets statutory,

regulatory, and board requirements. Additionally, the Board promulgates regulations to ensure consumer protections from fraud and abuse and educational standards that aligned with current practices to best serve Iowa's hearing-impaired citizens. Furthermore, this Board investigates complaints about unprofessional conduct.

Eliminating this Board may be interpreted by the U.S. Food and Drug Administration (FDA) as eliminating the ability of licensed hearing aid specialists to order the use of prescription hearing aids. Late 2022, the FDA issued regulations recategorized "traditional hearing aids," which have been dispensed by licensed hearing aid specialists for decades, as "prescription medical devices," which must be "prescribed or ordered the use of" by a licensed hearing care professional; 21 C.F.R. § 801.109. Prescription hearing aids require a written or oral authorization from a practitioner licensed by law to administer the device (C.F.R. §801.109).

It is for these reasons that it is paramount that Iowa maintains the Board of Hearing Aid Specialists. Thank you for your attention to my concerns with eliminating the Board of Hearing Aid Specialists and I respectfully ask for your consideration. Please feel free to contact me if you would like to discuss this issue further.

Thanks,

[Redacted signature block]

[Redacted contact information]

From:

To:

BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Bcc:

Subject: Hearing Instrument Specialist deregulation is wrong

Date: Fri Sep 01 2023 12:07:35 CDT

Attachments:

To whom it may concern,

I am a state of Iowa licensed hearing instrument specialist as well as Nationally Board Certified Hearing Instrument specialist. I have worked and treated patients in the state of Iowa for approximately Seven years.

I recently became aware of your intentions to eliminate the board for deregulation of licensed hearing instrument specialists in Iowa. This is a bad plan. Hearing loss is invisible and physically painless. Mentally and emotionally however, very painful. Proper treatment of hearing loss is a difficult and time-consuming process. Doing so with the non prescription or "OTC" style is never accurate and never properly treating the existing health condition. This allows the hearing loss to progress faster than it should.

I understand the need to evaluate and streamline all the boards, but DO NOT ELIMINATE this one. At least keep the intent intact by combining with another board. This will allow protections to stay in place but still save money at the same time

I have personally treated at least 3 individuals that had terminal tumors removed due to the results of our consultations as well as numerous other medical referrals.

The time and skill required to treat hearing loss is not something that can be done without medical and ethical standards in place.

In my position of hearing instrument specialist, I not only treat the hearing loss but provide lifelong treatment and hearing health guidance.

The question you must ask yourself, if your family member had a hearing loss, would you send them to just anyone? No, you would want the best treatment possible to be able to communicate and prevent further damage. Please think carefully and understand that deregulation of our licensed hearing instrument specialists, in our great state, is not the

answer.

Thank you

[REDACTED]

This message is intended for the addressee(s) only and may contain confidential or privileged information. Any use of this information by persons other than addressee(s) is prohibited. If you have received this message in error, please reply to the sender and delete or destroy all copies.

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Urgent: Boards and Commissions Review Committee - Comment
Date: Fri Sep 01 2023 12:10:41 CDT
Attachments: Boards and Commissions Review Committee.pdf
image001.gif

9-1-2023

Please see the attached information regarding possible action to discontinue the Hearing Instrument

Specialist Licensing Board.

Thank you,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Owner:

[REDACTED]

Filename: Boards and Commissions Review Committee.pdf

Last Modified: Fri Sep 01 12:10:41 CDT 2023

Date: September 1, 2023

Boards and Commissions Review Committee:

BCRCcomments@iowa.gov

My name is [REDACTED] and I'm a Hearing Instrument Specialist in Mason City Iowa. I'm writing to express my deep concern on your committee's action to possibly discontinue the Hearing Instrument Specialist Licensing Board. This action will not be good for the people in Iowa who require Hearing Aids and would do more harm than good because of the following:

- Eliminating the Board will compromise patient safety, satisfaction, and access.
- The U.S. Food and Drug Administration's recent regulatory changes necessitate preserving the Board, not eliminating it. This is because the FDA reclassified non-OTC hearing aids as "prescription medical devices" **that may only be dispensed upon a prescription or other order from a state-licensed practitioner, including hearing aid specialists. Eliminating the Board will result in the loss of licensure for every hearing aid specialist practitioner.** This will effectively prevent hearing aid specialists from being able to assist Iowans (your constituents) obtain the hearing care they need, drastically reducing patient access across the state. Thus, any belief that the Board may somehow now be unnecessary considering the FDA's recent regulatory changes would be deeply mistaken. I would conservatively estimate that over half of the Hearing Aids dispensed in Iowa are through Hearing Instrument Specialist!
- The proposed elimination of the Board would effectively force Iowans to seek hearing care from unregulated providers, many of whom should be expected to be fly-by-the-night online hearing aid companies that employ unscrupulous tactics to prey on consumers that need the help of a regulated medical profession such as hearing aid specialists.
- Eliminating the Board, and thus licensure of hearing aid specialists, will result in the closure of many small, family-owned clinics that provide good paying jobs in your communities.

Continued:

I have personally had people who have tried the OTC and on-line aids, only to find no one to help them or care for the product. After spending their hard earned money on them, unable to return them, they end up coming to me for help. I genuinely care for my clients and their wellbeing, and they know I will help them and be there for them in any way possible.

Thank you for your consideration in this matter.

Respectfully,



Owner:

[REDACTED]

Filename: image001.gif

Last Modified: Fri Sep 01 12:10:41 CDT 2023

ims

t

Pr

W

From: [REDACTED]
[REDACTED]
To: BCRComments@iowa.gov
<bcrcomments@iowa.gov>
Cc:
Bcc:
Subject: Deregulation of Hearing instrument specialist board
Date: Fri Sep 01 2023 12:12:22 CDT
Attachments:

To whom it may concern:

I am writing in opposition to the deregulation of licensing for Hearing Instrument specialists in Iowa. I just started working as a Hearing instrument specialist this past April. Without the proper training I received, countless mistakes could have been made and could have affected the outcome of my patients.

Without the proper training and licensing there are a plethora of things that could go wrong for someone who came in to be treated. For one there are many different disorders/infections that each present themselves in a different way, without the proper training someone who came in for help could leave without the right treatment which could lead to further health issues. For Example, let's say someone comes in with dizziness, signs of hearing loss and tinnitus wanting to get help for their hearing and their ears. Without the proper training one might not notice that these are signs of an Acoustic Neuroma and send the person on their way with improper instructions on getting it treated. An acoustic neuroma is a tumor that sits on the nerve that transmits balance and hearing signals to the brain. If this disorder were to go untreated, it would lead to very serious neurological complications, and eventually will be fatal if left untreated. Proper training and licensing's make it so we don't miss the signs on acoustic neuromas and so we aren't leading someone to their death bed by leaving it untreated/unnoticed. This is just one example of a type of disorder we deal with, there are at least 12 other disorders/infections that could present itself that we are required to know and identify.

Deregulation of licensing for hearing instrument specialists would open the door for anyone to fit the unaware and vulnerable, senior population. If a person were to try hearing aids and were fit incorrectly, it could lead to damaging their hearing even more than it is already. In the amount of time, it would take to notice the hearing aids were fit incorrectly, their loss may have gotten so bad that hearing aids are not even an option at this point. This leads to wasted time, money and quality of life of the patient. Again, these are just a few reasons as to why eliminating the hearing instrument specialist board is a very dangerous idea, for without the board it could potentially lead to unnecessary falls, neurological complications, and potential deaths of the population of Iowa who are left untreated. There are many other reasons why eliminating the hearing instrument specialist board is a very poor idea but I hope you take this into consideration too, Thank you.



From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Opposition for elimination of Board of Athletic Training
Date: Fri Sep 01 2023 12:14:31 CDT
Attachments: 20230901_112033.pdf

See attached letter.

--

[REDACTED]

CONFIDENTIALITY NOTICE:

This E-mail (including the attachments) is covered by the Electronic Communications Privacy Act, 18 U.S.C. §§ 2510-2521, is confidential and may be legally privileged. If you are not the intended recipient, you are hereby notified that any retention, dissemination, distribution, or copying of this communication is strictly prohibited. Please reply to the sender that you have received the message in error, then delete it. Thank You.

Owner:

[REDACTED]

Filename: 20230901_112033.pdf

Last Modified: Fri Sep 01 12:14:31 CDT 2023



McFarland Clinic
Sports Medicine



Sports Medicine
McFarland Clinic
Official Team Physicians

Date: Sept 1st, 2023

To: Whom it may concern

Regarding: Iowa Board of Athletic Training Elimination

Dear Legislatures:

My name is [REDACTED] and I am the co-chair of the Iowa Medical Society Sports Medicine Subcommittee and the Medical Director of Iowa State University's Athletic Training Educational Program. I am also a sports medicine fellowship trained physician practicing, for over 10 years, and team physician for Iowa State University and act in the overseeing capacity of many athletic trainers in the state of Iowa.

I am writing about the absolute medical need for licensure and maintaining the Board of Athletic Training in the state of Iowa. Athletic trainers are the first line medical professionals responsible for thousands of athletes in the state of Iowa from grade school to high school to recreational athletes. They provide emergency medical coverage, acute evaluation and treatment of injuries, prevention and rehabilitation of injuries and patient care in medical facilities to thousands of people in Iowa everyday.

Without having a Board of Athletic Training and maintenance of licensure, we are risking the public's safety and standard of care that is required for treatment of athletic training patients. Every state (other than California who will soon also require licensure) has athletic trainers licensed and Board certification. It is required for all athletic trainers who would provide medical care with any athletic team that is crossing state lines, including ALL of our Iowa junior colleges and universities, to have licensure and Board certification from the state of Iowa. Athletic trainers also don't only treat athletes; they also work in urgent cares, physician offices, occupational health settings and military groups that also require licensure for their medical scope of practice.

There is no reason to cut this board financially as they are always in the "black" and pay for everything they need to run their board, with even an excess of funds some years.

Cutting the Iowa Board of Athletic Training would cause catastrophic effects to our state of Iowa that is already struggling with providing medical services to those that need it in many locations and medically jeopardize the safety of thousands of people.

Please reconsider and do not cut the Iowa Board of Athletic Training. There will not be any medical, personal or financial benefit to the state in doing this, only terrible consequences for the people in the state of Iowa who receive medical care from Board Certified Athletic Trainers.

Sincerely,

[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Iowa Chiropractic Licensure Board
Date: Fri Sep 01 2023 12:14:31 CDT
Attachments: Outlook-wandwdeg.jpg

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions.
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

Owner:

[REDACTED]

Filename: Outlook-wandwdeg.jpg

Last Modified: Fri Sep 01 12:14:31 CDT 2023

MEDIAPOLIS
NATURAL
HEALTH



From:

[REDACTED]

To:

BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

[REDACTED]

Subject:

Hearing Aid Specialist Board review

Please review attached letter regarding the repeated attack on the Board of Hearing Aid Specialists.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Owner:

[REDACTED]

Filename:

Document5.pdf

Last Modified:

Fri Sep 01 12:22:44 CDT 2023



September 1, 2023

Dear Boards and Commissions Review Committee members,

As a licensed Hearing Aid Specialist in the state of Iowa, I am extremely concerned with the recommendation by the above-mentioned Committee and Governor Reynolds to eliminate the Board of Hearing Aid Specialists (herein referred to as "the Board"). We serve an increasingly growing population of Iowa citizens who are already put at risk in their daily lives of fraud, scam and financial abuse. The Board allows our patients to feel secure with who they trust with their hearing health.

As professionals approved by the Board, we complete full testing and screenings before properly fitting hearing aids, programmed specifically for that patient. Their safety and protection are at the forefront of Licensed Professionals. Without these licensures, you open Iowa citizens to being taken advantage of in numerous ways, including but not limited to fraudulent professionals who take financial advantage, improper fittings and even missed medical concerns.

Patients rely on our expertise to bring them back into their social lives, reconnect them with their families and enjoy the voices and sounds they struggle hearing without the help of prescription hearing aids.

Previous recommendations by this Committee to remove the Board over the last few years have shown itself to be a danger to the citizens of Iowa, who should be a priority to this Committee, and is the reason it continuously is dismissed. We need to protect our patients, our hearing-impaired families and friends.

It is incredibly important for this Committee to maintain the Board of Hearing Aid Specialists. Any other decision would be detrimental to the people of this state who we are supposed to protect.

I hope you take other professionals' concerns seriously and protect your citizens. Please feel free to contact me if you choose to discuss this matter further.

Sincerely and respectfully,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From:

[REDACTED]

To: BCRCComments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Bcc:

Subject: Hearing Specialist Deregulation Opposition

Date: Fri Sep 01 2023 12:23:19 CDT

Attachments:

To whom it may concern,

As a fully licensed hearing instrument specialist, it deeply concerns me of the proposition to eliminate the board of hearing aid specialists. By doing this, you are compromising the care, safety, and trust of the hearing impaired.

There is a lot that goes into treating someone with hearing loss and only licensed professionals should be qualified to do so. As a licensed hearing specialist, I went through extensive training to determine underlying medical conditions, some that can be life threatening. I'm qualified to know when someone needs to be medically referred to an ENT or other specialist.

We are talking about people's health and quality of life. Hearing health is a fundamental quality of life and should not be taken lightly. I urge you to consider the long-term implications of making the wrong decision. You or a loved one may be in the position of needing hearing healthcare and it should be handled by a professional and licensed hearing specialist.

Thank you for your time and consideration. I look forward to the continued support for the hearing healthcare community.

[REDACTED]

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic Training Board/licensure
Date: Fri Sep 01 2023 12:30:06 CDT
Attachments: image001.jpg

To Whom it May Concern;

I am [REDACTED], Director of Athletic Training Services at the University of Iowa. I am a life long Iowan and have been a certified AND licensed Athletic Trainer in the state of Iowa for 24 years. I am very alarmed that the state is not only considering elimination the Board of Athletic Training but also eliminating the licensure. Below are some facts and points of why it is essential to keep the licensure for the state:

* Athletic trainers play a vital role in the safety of young athletes playing sports in our state daily. Athletic trainers are a health care provider and are educated and trained to prevent, evaluate, treat, and rehabilitate injuries. Athletic trainers are prepared to provide the necessary immediate care and activate an emergency action plan/response in critical situations. Finally, and more specifically, with concussion care being such an important and vital topic, having trained professionals who can diagnose, treat, and return to play head injuries accurately and effectively is necessary for safe participation in sports.

* Athletic Trainers are health care professionals who specialize in the prevention, diagnosis and intervention of emergent, acute and chronic medical conditions involving impairment, functional limitations and disabilities.

* In recent years, athletic trainers have been vital for the survival of athletes, preventing paralysis, and recognition of other medical conditions.

* We all have seen the media coverage of Damar Hamlin and Bronny James's cardiac arrest – it was the actions of the athletic trainers and their evaluation, response and care that these 2 individuals are alive today.

* Personally, at The University of Iowa, we have had a staff Athletic Trainer save the life of a basketball manager during practice a few years ago and saved an athlete from paralysis last year by properly treating a cervical spine injury. These are just 2 examples of instances – I could go on and on.

* Athletic trainers provide medical services to all types of patients. Across the United States, in addition to practicing in traditional sports team settings, athletic trainers work in performing arts, public safety, occupational health, and with the armed forces.

* Licensure provides the highest level of patient protection for the public's safety, and it is

the standard form of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.

* 47 states and the District of Columbia require licensure for athletic trainers. Of the 3 remaining non-licensure states, New York has a licensure bill awaiting the Governor's signature and California has pending legislation. Thus, by moving away from licensing athletic trainers in our state, we would be moving in the opposite direction of everyone else and in this case, being different is not a good thing.

* Eliminating licensure in IA could potentially impact an AT's ability to practice across state lines (travel with their team), depending on regulatory requirements in other states. (ex. some states allow you to practice in their state temporarily, provided your home state maintains the same regulatory requirements). This would be detrimental to the collegiate athletes of this state and providing quality of medical care to them.

Thank you for taking the time to read this email,



Owner:

[REDACTED]

Filename: image001.jpg

Last Modified: Fri Sep 01 12:30:06 CDT 2023

From:

To:

BCRCcomments@iowa.gov
<brcrccomments@iowa.gov>

Cc:

Subject:

Opposition to Eliminate Board of Hearing Specialists

Good Afternoon,

This email pertains to content about the deregulation of licensing for Hearing Instrument Specialist in Iowa. I have been a licensed Hearing Instrument Specialist in the state of Iowa for a little over a year now. I have worked and specialized in small towns such as Muscatine, Tipton, and Washington, Iowa. I have had the pleasure of fitting prescription hearing aids to an estimated 80 patients thus far this year and will continue to provide ongoing care for over 300 patients. In my opinion, changing the requirements of Hearing Instrument Specialist would put many Iowans in harm's way.

When it comes to proper healthcare a hearing examination is not a part of an annual physical. The main reason that most physicians don't test for hearing loss is because it's something that they believe a patient shouldn't have to worry about till they are much older. As a licensed specialist, I understand that the key to success in treating hearing loss is an EARLY diagnosis. Our services at Miracle-Ear can provide free comprehensive examinations across the state of Iowa with little to no wait time. If you deprive Iowans of hearing tests not being done by professionals, you are essentially downplaying the true and REAL effects of untreated hearing loss. Knowing what we know now as licensed specialists we understand that untreated hearing loss can lead to a greater risk of depression, isolation, anxiety, cognitive decline, and falling.

Hearing healthcare should NOT be in the hands of everyday individuals. This is something that needs to be handled by a licensed professional.

Thank you for your attention to my concerns with eliminating the Board of Hearing Aid Specialists and I respectfully ask for your consideration.

Best regards,

[Redacted signature]

From:

[REDACTED]

To:

bcrccomments@iowa.gov
<bcrccomments@iowa.gov>; adam.zabner@legis.iowa.gov
<adam.zabner@legis.iowa.gov>; janice.weiner@legis.iowa.gov
<janice.weiner@legis.iowa.gov>

Cc:

Bcc:

Subject: Athletic Training Licensure

Date: Fri Sep 01 2023 12:44:46 CDT

Attachments:

Dear Board and Commissions Committee, and Senator Janice Weiner,

I am emailing you to protest the recommended elimination of the state requirement for athletic training licensure and the state Board of Athletic Training. State licensure protects our patients and ensures us that our athletic training staff are properly trained, undergoing continuous education requirements, and monitored. The board protects the scope and practice guidelines for our staff under the University of Iowa.

Athletic trainers are healthcare professionals who specialize in the prevention, diagnosis and intervention of emergent, acute, and chronic medical conditions involving impairment, functional limitations, and disabilities. Our athletic training staff have graduate degrees to specialize as a healthcare provider to provide this care to our patients.

Licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS) and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.

Thank you for your time,

[REDACTED]

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc: MYFA Board <myfaboard@gmail.com>
Bcc:
Subject: Licensed Certified Athletic Trainers
Date: Fri Sep 01 2023 12:45:11 CDT
Attachments:

My name is [REDACTED]. I am the VP of Operation for the Metro Youth Football Association (MYFA) in Cedar Rapids, Iowa. I was alerted this week that there is legislation being considered by the State of Iowa to do away with the licensing of Certified Athletic trainers (ATC's). Our youth football organization is a non profit that has serves the Cedar Rapids and surrounding area. This fall we have over 900 players between 1st and 6th grade athletes participating in flag, modified, and tackle football. When our teams are practicing, many of the districts have ATC's that are available should any of our MYFA coaches have a player that needs medical attention. For our tackle football games, we have ATC's present. They function as our medical coverage for these games. Our ATC's serve as the medical professional to diagnose, clear, and place players into concussion protocols. The ATC's also take care of any other on field injuries. Our certified athletic trainers perform their tasks which take the pressure off of our coaches and officials to return the players back to play.

Three years ago, after the Pandemic, due to the lack of ATC coverage, we brought in ambulance crews to cover our games. The MYFA Board leadership saw the big difference in the treatment of our players. The performance of our ATC's was greatly missed that season and we welcomed back a group of ATC's the following year. We see our ATC's in action every Sunday during the fall. Our league depends on licensed certified athletic trainers. We would hate to see any rules be changed that would allow unlicensed athletic trainers to work with our athletes.

On behalf of the MYFA Board, we ask that the policies remain that certified athletic trainers be licensed through the State of Iowa.

If you have any questions, please contact me.

[REDACTED]

From:

To:

BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Bcc:

Subject: Hearing Instrument Specialist deregulation

Date: Fri Sep 01 2023 13:01:43 CDT

Attachments:

I am writing in opposition to the deregulation of licensing for Hearing Instrument Specialists in Iowa.

I am a Patient Care Coordinator and have been working with people with a hearing loss for over 6 years.

One of the major problems I see with deregulating this profession is that people will not know who they are dealing with when they reach out for help.

Has this person any idea of what to look for when they test the hearing or even look in the person's ears prior to testing? How long have they been "in the business".

I have worked with many consultants, and I know of cases where lives were saved. I am not exaggerating, based on test results people were referred to a doctor and in two cases brain tumors were discovered. How will that still happen when anyone can open an office to sell aids without having gone through the licensing procedure?

Ask yourself, would you buy glasses from someone other than a licensed optician?, give birth helped by your someone who has always just wanted to work with babies instead of an OBGYN or trained Midwife? We laugh at people who google symptoms online instead of going to a doctor but with deregulating this profession you are asking people to do just that, not to get a trained licensed professional to diagnose their condition but to leave it up to someone who thinks this might be a good way to earn money.

The hearing instrument specialist is just that, a specialist. They have been trained in what to look for, they have been trained to test and know when something is other than a simple hearing loss and needs to be looked at by an ENT. How can someone who is untrained know what to look for and when to medically refer someone? I feel that deregulating this profession could lead not only to people having serious conditions ignored but also the elderly falling prey to people who are in it only to make money. With more and more studies being released connecting Alzheimers with hearing loss would you not think that having the best trained professionals doing this job is essential to the well-being of all?

Before deciding to de-regulate I would humbly ask that you look at the licensing procedure, what kind of education does a Hearing Professional go through? You might be surprised to learn what it takes for someone to get licensed and what they must learn to get those HIS letters behind their name.

Final question, if YOU came to the conclusion that you need a hearing test would you go to a non-licensed person for your help or to someone who has been trained to not only test your hearing but also be able to read those results and know if there is something more than a hearing loss going on?

Thank you, I hope you make the correct decision.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Interior Design Examining Board
Date: Fri Sep 01 2023 13:04:57 CDT
Attachments:

Hello,

My name is [REDACTED], a Registered Interior Designer (RID) living and working in Iowa. I'm reaching out in response to the Boards & Commissions Review Committee's August 29 recommendation to eliminate the Interior Design Examining Board. RID professionals directly impact public health, safety, and welfare, and now that RIDs can practice independently in Iowa, an oversight board led by practitioners and subject matter experts will be more important than ever before. I urge the Committee to consider keeping some form of a regulatory board overseeing Registered Interior Designers.

Below are a few reasons why the Committee should consider keeping the Interior Design Examining Board:

- * With the passage of SF 135, RIDs can now practice independently, therefore the need for state oversight and disciplinary capacity is paramount. Subject matter experts and practitioners are best equipped to handle such issues.
- * CIDQ, the national certification body, does not handle state issues of discipline or enforcement. Regulated states employ boards for that important function.
- * We urge the committee to maintain a subject matter expert led board overseeing the interior design profession, whether through maintaining the current board or merging it with the Board of Architects. Due to the overlap in practice between architecture and interior design, this framework is well positioned to handle practice issues, which is why 15 states employ this framework.

Please keep a subject matter expert-led regulatory board intact for the interior design profession.

Thank you for your time.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: Ristow, Nate [IGOV]
<nate.ristow@governor.iowa.gov> on behalf of Ristow, Nate
[IGOV] <Nate.Ristow@governor.iowa.gov>
<nate.ristow@governor.iowa.gov>
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Fwd: Interior Design Examining Board
Date: Fri Sep 01 2023 13:15:46 CDT
Attachments:

Nate Ristow

Administrative Rules Coordinator
Office of Governor Kim Reynolds
(515) 314-2998

[REDACTED]

Hi Nate,

My name is [REDACTED], a Registered Interior Designer (RID) living and working in Iowa. I'm reaching out in response to the Boards & Commissions Review Committee's August 29 recommendation to eliminate the Interior Design Examining Board. RID professionals directly impact public health, safety, and welfare, and now that RIDs can practice independently in Iowa, an oversight board led by practitioners and subject matter experts will be more important than ever before. I urge the Committee to consider keeping some form of a regulatory board overseeing Registered Interior Designers.

Below are a few reasons why the Committee should consider keeping the Interior Design Examining Board:

* With the passage of SF 135, RIDs can now practice independently, therefore the need for state oversight and disciplinary capacity is paramount. Subject matter experts and practitioners

are best equipped to handle such issues.

* CIDQ, the national certification body, does not handle state issues of discipline or enforcement. Regulated states employ boards for that important function.

* We urge the committee to maintain a subject matter expert led board overseeing the interior design profession, whether through maintaining the current board or merging it with the Board of Architects. Due to the overlap in practice between architecture and interior design, this framework is well positioned to handle practice issues, which is why 15 states employ this framework.

Please keep a subject matter expert-led regulatory board intact for the interior design profession.

Thank you for your time.

[Redacted]

[Redacted]

[Redacted]

[Redacted]

From:

To:

bcrccomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Bcc:

Subject: Athletic Training Licensure

Date: Fri Sep 01 2023 13:18:31 CDT

Attachments:

To whom it may concern:

My name is [REDACTED]. I am currently an athletic trainer at the University of Iowa Hospitals & Clinics. I have been certified for nine years and have worked with hundreds of different patients of varying backgrounds across a spectrum of settings.

As an athletic trainer practicing in the state of Iowa, it greatly concerns me that there is even a bit of consideration towards removing the licensure board and licensing processing for the athletic trainers in this state. This is a widely accepted standard for athletic trainers across the country, along with countless other allied healthcare providers (of which athletic trainers are).

I urge you to seriously consider the ramifications of licensure removal for athletic trainers. Employers, with potentially no background in healthcare, would then be responsible for determining the viability of candidates and be in charge of determining who will provide healthcare on their behalf. These employers would range from hospitals to high schools to corporations across the state, putting the well-being of individuals of all different ages and backgrounds at risk of suboptimal care.

Removing the licensure process for a profession that is considered an allied health profession by both the U.S. Department of Health and Human Services, and the American Medical Association, is a significant step backwards in the progress of what athletic trainers have attained over the years. Understand that this decision is "against the grain" of what essentially every other state in the U.S. is currently doing or working towards.

I feel I do not need to give examples of situations where athletic trainers are necessary and how much of an impact they have on peoples' health and lives. We have been arguing this for years and it usually falls on deaf ears. I ask you to simply ask yourself this question: if you went to get medical care, for whatever reason you may choose, anything from a hang nail to a cardiac episode, do you want a healthcare provider that knows what they are doing, or one that might know what they are doing. This is the situation that is brought about with removing our state licensure and the risk that is put into place for people everywhere.

I greatly appreciate your time and energy on this matter. If you have any questions, or concerns, I would be more than happy to discuss more. Thank you again.

[REDACTED]



From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: IA Athletic Trainers need to be licensed.
Date: Fri Sep 01 2023 13:33:08 CDT
Attachments:

Dear Boards and Commissions Review Committee,

I was discouraged to see the Board of Athletic Training and athletic training licensure on the chopping block as part of your reorganization efforts.

I understand the goal of streamlining systems and the reduction of governmental burden in certain areas, but eliminating the Board of Athletic Training and/or licensure for athletic trainers in Iowa would be, at best, reckless, putting many Iowans, many of them young athletes, in danger.

Athletic training is a healthcare profession and we athletic trainers are responsible for the health and well-being of a specific population. In my case, I provide athletic training services for approximately 400 athletes at Liberty High School in North Liberty, IA.

To become an athletic trainer, one must obtain an advanced degree from an accredited institution, completing very specific coursework along with hundreds of hours of clinical training in order to become eligible for board testing at a national level. We have national regulation via this board exam for our initial credential to practice. Then, like many other professional organizations, individual states are responsible for the adherence to and maintenance of educational competency via licensure and state board regulation. We must have a standard of practice and a system of vetting applicants or current licensees. Without such a standard we will quickly head down the path of unregulated chaos as seen in, and only in, the state of California which does not currently regulate athletic training at the state level.

I cannot overstate the importance of maintaining our regulating bodies in order to ensure the protection of Iowa athletes – from youth sports through adult weekend warriors. Reducing or eliminating regulation will lead to the reversion of athletic training practice in our state to the previous climate of athletic training where literally anyone could serve as the "Athletic Trainer" at their place of employment as that employer saw fit.

Additionally, this proposed reduction will not affect cost-saving measures as the Iowa Board of Athletic Training is comprised of volunteer members and meets virtually, operating without funding from the State.

I beg for your support in our efforts to maintain our Licensure and Board as is, without

modification.

Please feel free to contact me for further discussion as any assistance you could provide on our behalf to the Committee would be beneficial to me, my colleagues across the state and the athletes at all levels in the State of Iowa."

Sincerely,

[REDACTED]

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: opposition to the elimination of the Board of Athletic Training and licensure of athletic trainers in Iowa
Date: Fri Sep 01 2023 13:53:49 CDT
Attachments:

Senator Weiner,

I am writing to voice my opposition to the elimination of the Board of Athletic Training and licensure of athletic trainers in Iowa. This is very detrimental to not just the profession, but to the thousands of patients who athletic trainers care for every day in our state. Elimination of licensure would lead to danger and safety issues for all of our physically active patients, but especially our youth athletes.

I am a rower on the University of Iowa Rowing Team and our athletic trainer is very important to us and her qualification means a lot.

In 2018, Athletic Trainers were the driving force behind passage of HF2442, which set standards for concussion management in youth sports. Athletic Trainers are the primary licensed health care providers on the sidelines for all of Iowa's high school football games and other interscholastic sporting events. Removing AT's licensure would conflict with current Iowa code in this area and cause unresolvable problems for high schools trying to protect their students.

California is the only other state without regulation for athletic trainers, and I don't want to see Iowa compared to that state as the only two states who allow delinquent health care professionals to come practice and place our residents in danger.

Licensure provides the highest level of patient protection, and it is the gold standard of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical

Association also recognizes athletic training as an allied health care profession.

Eliminating licensure in Iowa could potentially impact an AT's ability to practice across state lines (travel with their team), depending on regulatory requirements in other states. (ex. some states allow you to practice in their state temporarily, provided your home state maintains the same regulatory requirements).



From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Elimination of the Board of Athletic Training
Date: Fri Sep 01 2023 13:55:03 CDT
Attachments:

Senator Weiner,

I am writing to voice my opposition to the elimination of the Board of Athletic Training and licensure of athletic trainers in Iowa. This is very detrimental to not just the profession, but to the thousands of patients who athletic trainers care for every day in our state. Elimination of licensure would lead to danger and safety issues for all of our physically active patients, but especially our youth athletes.

Without the qualified work of our athletic trainers, student athletes like myself, not only at the University of Iowa, but across the entire state, wouldn't be able to compete as comfortably at the highest level. Our athletic trainers are crucial for our performance.

In 2018, Athletic Trainers were the driving force behind passage of HF2442, which set standards for concussion management in youth sports. Athletic Trainers are the primary licensed health care providers on the sidelines for all of Iowa's high school football games and other interscholastic sporting events. Removing AT's licensure would conflict with current Iowa code in this area and cause unresolvable problems for high schools trying to protect their students.

California is the only other state without regulation for athletic trainers, and I don't want to see Iowa compared to that state as the only two states who allow delinquent health care professionals to come practice and place our residents in danger.

Licensure provides the highest level of patient protection, and it is the gold standard of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical

Association also recognizes athletic training as an allied health care profession.

Eliminating licensure in Iowa could potentially impact an AT's ability to practice across state lines (travel with their team), depending on regulatory requirements in other states. (ex. some states allow you to practice in their state temporarily, provided your home state maintains the same regulatory requirements).



From: [REDACTED]
To: BCRCcomments@iowa.Gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Board of Hearing Instrument Specialists
Date: Fri Sep 01 2023 14:08:20 CDT
Attachments:

Dear Boards and Commissions Review Committee members,

I write to you today, as a licensed hearing aid specialist who provides hearing healthcare services to an increasingly growing population, to express my concern with the Boards and Commissions Review Committee Subcommittee's August 29, 2023, recommendation to eliminate the Board of Hearing Aid Specialists (herein referred to as "the Board").

The elimination of this Board will result in the unintended consequence of:

- ***** Limiting/ lowering hearing healthcare access which is already an underserved population;
- ***** Loss of licensure;
- ***** Eliminating consumer protection;
- ***** Compromised patient safety;
- ***** Individual complacency due to lack of CE standards;
- ***** Reducing competition; and
- ***** Laxed hearing healthcare industry standards effecting patient outcomes.

This is because this Board – consisting of hearing healthcare industry experts- evaluates an individual's application for licensure and issues a license if the individual meets statutory, regulatory, and board requirements. Additionally, the Board promulgates regulations to ensure

consumer protections from fraud and abuse and educational standards that aligned with current practices to best serve Iowa's hearing-impaired citizens. Furthermore, this Board investigates complaints about unprofessional conduct.

The proposed elimination of the Board would effectively force Iowans to seek hearing care from unregulated providers, many of whom should be expected to be unqualified to identify potential underlying health conditions or be online hearing aid companies that employ unscrupulous tactics to prey on consumers that need the help of a regulated medical profession such as hearing aid specialists.

Eliminating this Board may be interpreted by the U.S. Food and Drug Administration (FDA) as eliminating the ability of licensed hearing aid specialists to order the use of prescription hearing aids. Late 2022, the FDA issued regulations recategorized "traditional hearing aids," which have been dispensed by licensed hearing aid specialists for decades, as "prescription medical devices," which must be "prescribed or ordered the use of" by a licensed hearing care professional; 21 C.F.R. § 801.109. Prescription hearing aids require a written or oral authorization from a practitioner licensed by law to administer the device (C.F.R. § 801.109).

It is for these reasons that it is paramount that Iowa maintains the Board of Hearing Aid Specialists.

Thank you for your attention to my concerns with the proposed elimination of the Board of Hearing Aid Specialists and I respectfully ask for your consideration. Please feel free to contact me if you would like to discuss this issue further.

Sincerely,

[REDACTED]

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Elimination of Athletic Training Licensure
Date: Fri Sep 01 2023 14:13:00 CDT
Attachments:

Hi, I am a first year graduate student at the University of Iowa studying Athletic Training. Recently, I saw the news that the state of Iowa is looking to remove the board that licenses Athletic Trainers in the state. As someone who is looking to remain in the state of Iowa, and practice Athletic training, it deeply saddens me to see the reversal of progress that has been made in our field over the last couple decades. Eliminating licensure for our profession gives the impression that our profession is less important than it truly is. Licensing ATs is vital in keeping our athletes healthy, the lack of licensure opens the doorway to people without qualifications becoming ATs, jeopardizing the health of our athletes. Overall, licensing ATs keeps kids and athletes safe in all of our high schools and below.

Thanks,
[REDACTED]

From: [REDACTED]
[REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Licensed Hearing Professionals
Date: Fri Sep 01 2023 14:24:34 CDT
Attachments:

To whom it may concern,

As An individual on a training permit for the last 6 months with Miracle Ear, I STRONGLY oppose the proposition to eliminate the board of hearing aid specialists. Eliminating the board is eliminating the safety, ethics, and integrity of the business.

If a person seeking hearing help receives no evaluation from a licensed and certified professional, there are many possible negative outcomes. First, a person may not even need a hearing device at all. Many times in my short career I have had to refer someone to an Ear, Nose and Throat Doctor for medical attention OTHER than a hearing aid. There have been those with perforations of their ear drums, fluid in their Eustachian tubes, ear infections, wax impactions, and the list goes on and on. If I were not certified and licensed, it would have been all too easy to sell hearing devices to ALL of those people, and in effect throw their hearing healthcare in the garbage. It is imperative that these members of our community are given extensive evaluation by a professional with the right training, competency, and the care needed.

Next, and extremely important, a full and precise audiometric evaluation MUST be completed on every person with hearing impairment. This needs to be done to determine that success with a hearing device is even possible. Every person deserves quality care with their health in every aspect, and hearing should be treated no differently than any other. Being certified and trained to prescribe and fit a hearing device to each individual person's hearing loss is CRITICAL for their success and quality of life. If the board for hearing specialists is eliminated, people will have limited access to this type of quality care which could result in them being fit improperly. Being under amplified or over amplified are both very real possibilities which can result in further damage to a person's hearing, or lack of quality in their daily life.

I finish by urging you to stop the elimination of the Board of Hearing Specialists. There are always aspects in life that we can find the "easy" way out, the easy way is NOT sending anyone with the capability to put in order in to be able to dispense medical devices. Consideration of the individuals wearing the aids deserve to be fit with medical devices from a licensed professional.

Get Outlook for iOS

From: Ristow, Nate [IGOV]
<nate.ristow@governor.iowa.gov> on behalf of Ristow, Nate
[IGOV] <Nate.Ristow@governor.iowa.gov>
<nate.ristow@governor.iowa.gov>
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: FW: Board of Athletic Trainers
Date: Fri Sep 01 2023 14:42:31 CDT
Attachments:

Nate Ristow

515-314-2998

From: [REDACTED] >
Sent: Friday, September 1, 2023 2:22 PM
To: kraig.paulsen@iowa.gov; Johnson, Larry [DIA] <Larry.Johnson@dia.iowa.gov>; Ristow, Nate [IGOV] <Nate.Ristow@governor.iowa.gov>; Nicholson, Jacob [IGOV] <Jacob.Nicholson@governor.iowa.gov>; Barbara Sloniker <bsloniker@siouxlandchamber.com>; Faith, David <David.Faith@ag.iowa.gov>; Janice.Weiner@legis.iowa.gov; Zabner, Adam [LEGIS] <Adam.Zabner@legis.iowa.gov>; Bloomingdale, Jane [LEGIS] <Jane.Bloomingdale@legis.iowa.gov>; Schultz, Jason [LEGIS] <Jason.Schultz@legis.iowa.gov>; Scott, Kerry [LEGIS] <kerry.scott@legis.iowa.gov>; Covey, Jason [LEGIS] <Jason.Covey@legis.iowa.gov>; Schlesky, Megan [LEGIS] <Megan.Schlesky@legis.iowa.gov>; Guillaume, Brian [LEGIS] <Brian.Guillaume@legis.iowa.gov>
Subject: Board of Athletic Trainers

Hello,

My name is [REDACTED], I am a Licensed Athletic Trainer working at Ballard Community High Schools in. I'm reaching out in response to the Boards Commissions Review Committee's August 29 recommendation to eliminate the Board of Athletic Trainers. An oversight board led by practitioners and subject matter experts is very important for the health and safety of many across the state of Iowa. I urge the Committee to consider keeping some form of a regulatory board overseeing Athletic Trainers. Athletic trainers provide medical services to all types of patients, in addition to practicing in traditional sports team settings, athletic trainers work in performing arts, public safety, occupational health, and with the armed forces. Currently 48 states and Washington D.C require licensure for Athletic Trainers, California is in the process

of passing legislation. Athletic trainers are healthcare professionals who specialize in the prevention, diagnosis and intervention of emergent, acute and chronic medical conditions involving impairment, functional limitations and disabilities. The Board helps provide scope of practice guidance and protects the public from untrained persons, it lets employers easily know an Athletic Trainer is properly trained, taking continuing education, and monitored. Do not move Iowa backwards. Please keep a regulatory board intact for Athletic Trainers.

Thank you.



From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: reorganization
Date: Fri Sep 01 2023 14:46:24 CDT
Attachments:

September 1, 2023

Dear Board Members,

I recommend against combining the Iowa Chiropractic Licensure Board with other boards. It has worked well to date and combining it with others would:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions.
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Please consider this in your deliberations.

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: DO NOT GET RID OF IOWA ATHLETIC TRAINING LICENSURE
Date: Fri Sep 01 2023 14:53:36 CDT
Attachments:

Hello!

My name is [REDACTED] and I am an athletic trainer who is currently licensed to practice in the state of Colorado and Minnesota. It has come to the attention of athletic trainers around the world that the Iowa state government may be eliminating the Athletic Training licensure board. Doing so would be an immense mistake. Athletic Trainers are licensed because we practice healthcare. That's the really the whole argument that needs to be made here. Would you defund or eliminate the licensure board of MDs, RNs, DOs, PTs, PAs, MAs, or literally any other healthcare profession? I believe the issue is that many people think they hold the same skill set as Athletic Trainers because to the public eye, we are on the sideline. And if everything goes well, we aren't doing much (to the public eye, haha - ATs are CONSTANTLY working.) Athletic Trainers obtain a college degree, take a certification exam, obtain licensure, and then obtain continuing education credits (like any other healthcare profession.) To me, it is extremely poor, backwards, and dangerous thinking to allow someone without the above criteria to practice athletic training. ESPECIALLY regarding minors, youth sports, and recreational sports. Horror stories emerge frequently with mishandled emergency situations, poor coaching decisions, and to be honest - not great athletic trainers.

End of story - keep licensure in place for now please. You will be responsible for a lot of bad things unfortunately if the board is repealed.

Thanks,
[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic Trainer Licensure
Date: Fri Sep 01 2023 15:06:44 CDT
Attachments:

I hope this email finds you well. I am a Licensed Athletic Trainer in the State of Iowa, working for the largest employer of Athletic Trainers in the country, Athletico. I am writing to express my deep concern and strong opposition to the recent consideration of eliminating the Iowa Board of Athletic Training.

The Athletic Training profession is composed of Certified and Licensed Athletic Trainers from professional, collegiate, and high school teams; industries; physician offices; rehabilitation clinics; and every branch of the United State military working together to promote and practice the profession of Athletic Training within the State of Iowa. Athletic Trainers have a long history of providing quality health care for athletes and persons engaged in regular physical activity. They are highly skilled licensed health care professionals who specialize in immediate, acute, and emergency care, examination, assessment, injury prevention, risk management, therapeutic intervention and rehabilitation of injury and illness. We are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS) & also carry National Provider Identifier numbers (NPIs). Lastly, the American Medical Association (AMA) also recognizes Athletic Trainers as an allied health care profession.

The National Athletic Trainers' Association (NATA) represents and supports more than 45,000 members of the Athletic Training profession, including more than 1129 licensed Athletic Trainers in the State of Iowa. Licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for health care professions. It also ensures clients and employers that an Athletic Trainer is properly trained, taking continuing education, and monitored. The Associated Board of Athletic Training helps provide scope of practice guidance & protects the public from untrained persons. There is no expense associated with this Board. The fees that Athletic Trainers pay to renew their license cover all costs and year over year they are consistently in the black.

By eliminating the Board of Athletic Training and subsequent licensing for Athletic Trainers, we risk losing a dedicated group of professionals who are uniquely qualified to address the specialized needs of athletes and active individuals. Their knowledge in injury prevention, emergency response, and rehabilitation techniques is invaluable in safeguarding the health of

those who rely on their expertise.

I urge this committee to reconsider this proposal and recognize the indispensable contributions that Athletic Trainers make to the communities of Iowa. Their skills and training are essential components of a comprehensive healthcare system that prioritizes the physical well-being of its citizens.

In conclusion, I stand firmly against the elimination of the Iowa Board of Athletic Training and implore the Board to continue supporting this critical profession. Let us work together to ensure that athletes and active individuals throughout the state continue to receive the highest standard of care.

Respectfully,

A large black rectangular redaction box covers the signature and name of the sender.

We empower people, inspire hope, and transform lives.

Now offering a telehealth option for continued care. [Learn more here.](#)

This message may contain information that is confidential, privileged, or otherwise protected from disclosure. If this message contains Protected Health Information, its acquisition, transmission, storage and use is protected by HIPAA. If you are not the intended recipient, any review, disclosure, copying, or distribution, of this material is strictly prohibited. If you receive this message in error or are not the named recipient(s), please contact the sender immediately and delete this message. Thank you for your cooperation.

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Boiler Board
Date: Fri Sep 01 2023 15:10:58 CDT
Attachments: image001.jpg
image002.jpg
image003.jpg
image004.jpg
image005.jpg
image006.jpg

Dear Committee,

Please consider keeping the State of Iowa Boiler Board. As a design engineer for the last 34 years in the Iowa, the board has proven to be a valuable source of information and the board serves as a 'checks and balances' for the state boiler inspectors office. Both the board and the inspectors office are stronger together and they serve the state of Iowa with honor.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Owner:

[REDACTED]

Filename: image001.jpg

Last Modified: Fri Sep 01 15:10:58 CDT 2023



Owner:

[REDACTED]

Filename: image002.jpg

Last Modified: Fri Sep 01 15:10:58 CDT 2023

Owner:

[REDACTED]

Filename: image003.jpg

Last Modified: Fri Sep 01 15:10:58 CDT 2023

Owner:

[REDACTED]

Filename: image004.jpg

Last Modified: Fri Sep 01 15:10:58 CDT 2023

Owner:

[REDACTED]

Filename: image005.jpg

Last Modified: Fri Sep 01 15:10:58 CDT 2023

Owner:

[REDACTED]

Filename: image006.jpg

Last Modified: Fri Sep 01 15:10:58 CDT 2023

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Iowa Chiropractic Licensure Board
Date: Fri Sep 01 2023 15:11:10 CDT
Attachments:

Dear Board and Commission Review Committee:

As a chiropractor in my 20th year of practice in Iowa, as well as a family practice that was started in 1964, I would like to express that the Iowa Chiropractic Licensure Board not be combined and merged with any other boards. This creates many issues that impact public safety which include:

1. A safety issue by combining and diluting expertise on the board knowledge to deal with specific cases.
2. This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions.
3. We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will only exacerbate the issue.

Thank you for your support, and is my hope that you will reconsider the merging of the Iowa Chiropractic Licensure Board with any boards.

Respectfully submitted,

[REDACTED]

From:

To:

bcrccomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Subject:

Combining the Iowa Chiropractic Licensure Board with other boards

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. I ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

--

[Redacted signature]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: REQUESTED ACTION: Opposition to Elimination of Iowa Board of Athletic Training
Date: Fri Sep 01 2023 16:23:44 CDT
Attachments: image001.png
image002.png
image003.png
image004.png
image005.png
image006.png
image007.png
image008.png

Dear Members of the Boards and Commissions Review Committee,

I hope this email finds you well. My name is [REDACTED], and I am a Licensed Athletic Trainer in the State of Iowa, working for the largest employer of Athletic Trainers in the country, Athletico. I work along alongside 350 athletic trainers in our company, with 50 of those 350 teammates residing and practicing in Iowa. I am writing to express my deep concern and strong opposition to the recent consideration of eliminating the Iowa Board of Athletic Training.

The Athletic Training profession is composed of Certified and Licensed Athletic Trainers from professional, collegiate, and high school teams; industries; physician offices; rehabilitation clinics; and every branch of the United State military working together to promote and practice the profession of Athletic Training within the State of Iowa. Athletic Trainers have a long history of providing quality health care for athletes and persons engaged in regular physical activity. They are highly skilled licensed health care professionals who specialize in immediate, acute, and emergency care, examination, assessment, injury prevention, risk management, therapeutic intervention and rehabilitation of injury and illness. We are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS) & also carry National Provider Identifier numbers (NPIs). Lastly, the American Medical Association (AMA) also recognizes Athletic Trainers as an allied health care profession.

The National Athletic Trainers' Association (NATA) represents and supports more than 45,000 members of the Athletic Training profession, including more than 1129 licensed Athletic Trainers in the State of Iowa. Licensure provides the highest level of patient protection for the

public's safety, and it is the standard form of regulation for health care professions. It also ensures clients and employers that an Athletic Trainer is properly trained, taking continuing education, and monitored. The associated Board of Athletic Training helps provide scope of practice guidance & protects the public from untrained persons. There is no expense associated with this Board. The fees that Athletic Trainers pay to renew their license cover all costs and year over year they are consistently in the black.

By eliminating the Board of Athletic Training and subsequent licensing for Athletic Trainers, we risk losing a dedicated group of professionals who are uniquely qualified to address the specialized needs of athletes and active individuals. Their knowledge in injury prevention, emergency response, and rehabilitation techniques is invaluable in safeguarding the health of those who rely on their expertise.

I urge this committee to reconsider this proposal and recognize the indispensable contributions that Athletic Trainers make to the communities of Iowa. Their skills and training are essential components of a comprehensive healthcare system that prioritizes the physical well-being of its citizens, especially in rural Iowa communities.

The move to eliminate the Board of Athletic Training is a backward movement in comparison to the rest of the country. Across the US, 49/50 states have some form of regulation of the profession athletic training. The one remaining state has an active bill which would require regulation of the practice of athletic training. Licensure is required in 47/50 states. Thus, by moving away from licensing athletic trainers in our state, we would be moving in the opposite direction of everyone else and in this case, being different is not a good thing.

In conclusion, I stand firmly against the elimination of the Iowa Board of Athletic Training and implore the Board to continue supporting this critical profession. Let us work together to ensure that athletes and active individuals throughout the state continue to receive the highest standard of care.

Respectfully,



[REDACTED]

[REDACTED]

[REDACTED] message may contain information that is confidential, privileged, or otherwise protected from disclosure. If this message contains Protected Health Information, its acquisition, transmission, storage and use is protected by HIPAA. If you are not the intended recipient, any review, disclosure, copying, or distribution, of this material is strictly prohibited. If you receive this message in error or are not the named recipient(s), please contact the sender immediately and delete this message. Thank you for your cooperation.

Owner:

[REDACTED]

Filename: image001.png

Last Modified: Fri Sep 01 16:23:44 CDT 2023

image001.png for Print
en



ge

Owner:

[REDACTED]

Filename: image002.png

Last Modified: Fri Sep 01 16:23:44 CDT 2023

Owner:

[REDACTED]

Filename: image003.png

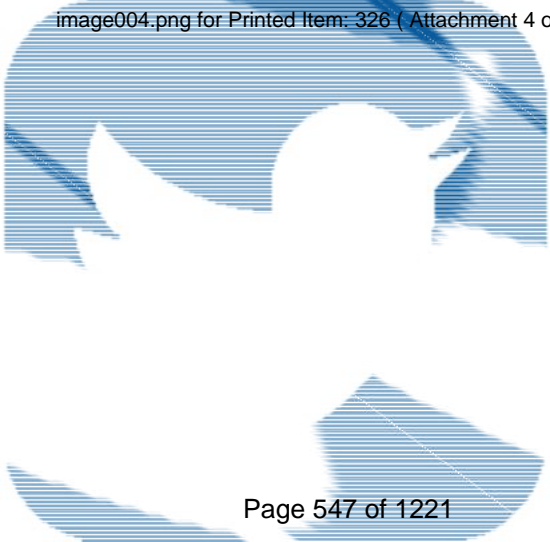
Last Modified: Fri Sep 01 16:23:44 CDT 2023

Owner:

[REDACTED]

Filename: image004.png

Last Modified: Fri Sep 01 16:23:44 CDT 2023



Owner:

[REDACTED]

Filename: image005.png

Last Modified: Fri Sep 01 16:23:44 CDT 2023

YOU Tube

Owner:

[REDACTED]

Filename: image006.png

Last Modified: Fri Sep 01 16:23:44 CDT 2023

Owner:

[REDACTED]

Filename: image007.png

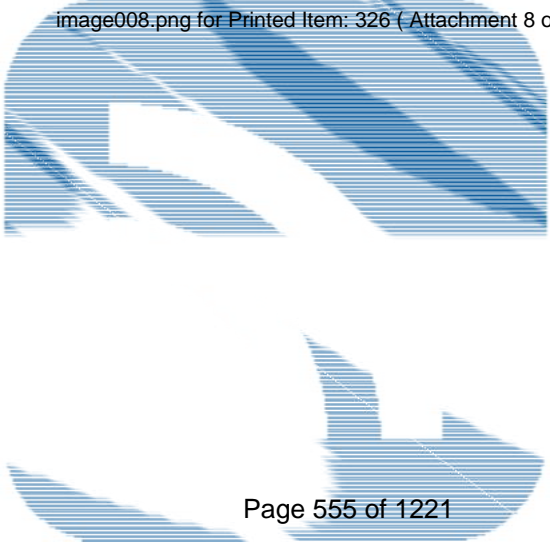
Last Modified: Fri Sep 01 16:23:44 CDT 2023

Owner:

[REDACTED]

Filename: image008.png

Last Modified: Fri Sep 01 16:23:44 CDT 2023



From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc: [REDACTED]
Subject: State of Iowa Boiler and Pressure Vessel Board
[REDACTED]

Members of The Boards and Commissions Review Committee:

My name is [REDACTED], and I am a professional mechanical engineer registered in the State of Iowa. I understand your committee is considering eliminating the Boiler and Pressure Vessel Board. I have significant concerns with this recommendation.

I served on the Boiler Board from its inception until May of last year. I was fortunate to serve with a collection of thoughtful, dedicated, and extremely knowledgeable individuals all focused on the same goal – interpretation and enforcement of the boiler codes and statues in a responsible and consistent manner. The public good must be served while being fair and transparent to interested parties; owners, contractors, vendors, and engineers. I’ve been practicing mechanical engineering since 1994, and up until the Board was created I found the relationship between these entities and the state to be very much adversarial, due in large part to the lack of any recourse to have an appeal heard by an independent committee.

I want to emphasize that these comments are in no way a reflection of the current Boiler Inspection department, I simply wish to voice my concern with returning to the pre- Board days, with no system of checks and balances in place.

Thank you for your consideration,

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Board of Athletic Training and Licensure of athletic trainers
Date: Fri Sep 01 2023 17:29:13 CDT
Attachments:

Senator Weiner,

I am writing to voice my opposition to the elimination of the Board of Athletic Training and licensure of athletic trainers in Iowa. This is very detrimental to not just the profession, but to the thousands of patients who athletic trainers care for every day in our state. Elimination of licensure would lead to danger and safety issues for all our physically active patients, but especially our youth athletes.

In 2018, Athletic Trainers were the driving force behind passage of HF2442, which set standards for concussion management in youth sports. Athletic Trainers are the primary licensed health care providers on the sidelines for all of Iowa's high school football games and other interscholastic sporting events. Removing AT's licensure would conflict with current Iowa code in this area and cause unresolvable problems for high schools trying to protect their students.

California is the only other state without regulation for athletic trainers, and I don't want to see Iowa compared to that state as the only two states who allow delinquent health care professionals to come practice and place our residents in danger.

Licensure provides the highest level of patient protection, and it is the gold standard of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.

Eliminating licensure in Iowa could potentially impact an AT's ability to practice across state lines (travel with their team), depending on regulatory requirements in other states. (ex. some states allow you to practice in their state temporarily, provided your home state maintains the same regulatory requirements).

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc: [REDACTED]
Subject: Board and Commission Review Committee
[REDACTED]

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic Training Licensing Board
Date: Fri Sep 01 2023 17:49:38 CDT
Attachments:

Dear Boards and Commission Committee,

I am emailing you regarding the possible proposal of eliminating the Iowa Athletic Training Licensing Board. My name is [REDACTED] and I am currently a 2nd year Master's of Athletic Training student at the University of Iowa. I graduated from UNI in 2022 with a degree in Athletic Training and Rehab studies. I am pursuing my Master's degree not only to be eligible to sit for the certification, but to also learn a higher degree of the profession as well.

I strongly urge you to consider keeping the Iowa Athletic Training Licensing Board not only for students like me who work tirelessly during school to become the best possible athletic trainer, but also for the athletes in Iowa that we come in contact with too. To point out, licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession. Athletic training needs the licensing board to regulate the practice in Iowa to protect the public's safety and also to provide Iowa's athletes/general population the best possible care they can receive.

Athletic training plays a very pivotal role in sports medicine that wears a lot of hats for the athletes no matter what their age is. You can not only find athletic trainers in high schools and colleges, you can find them in the military, hospitals and clinicals, occupational health, and even performing arts. Furthermore, athletic trainers are healthcare professionals who specialize in the prevention, diagnosis and intervention of emergent, acute and chronic medical conditions involving impairment, functional limitations and disabilities. As you can see athletic training is a very diverse healthcare role that must be regulated licensing since there are so many aspects that an athletic training can cover.

By not having a licensing board, regulating the athletic training license in the state of Iowa can not only affect Iowa AT's, but also out-of-state AT's traveling to Iowa for their job. If the licensing board is eliminated, it would then cause anyone to call themselves an athletic trainer without the proper schooling. Then that affects the overall quality of care to patients and athletes as a whole. This is why I urge you to strongly re-consider this proposal to eliminate the AT licensure board altogether.

Thank you,
[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Written comments for the BCRC re: Massage Board
Date: Fri Sep 01 2023 18:05:57 CDT
Attachments:

September 1, 2023

To the Boards and Commissions Review Committee:

I've been a licensed massage therapist since 2005 and was honored to serve as the chair person for the Iowa Board of Massage Therapy. Thank you for allowing me to share my initial thoughts on the proposed merger of the Massage, Physical and Occupational Therapy, Chiropractic, and Respiratory Therapy boards.

I recognize we have too many boards and commissions. In researching this, I saw some that have not had members or meetings in years. I fully support eliminating or merging inactive boards.

I'm not opposed to merging some healthcare boards, and I believe if a merger is inevitable considering Massage Therapy with Physical and Occupational Therapy makes the most sense, as they both deal with similar physical pain relief and soft tissue work. I'm just concerned about the logistics of a merger and would hope licensees would be included in the discussion to ensure the plan does not have unintended negative consequences for public health, wellness, and access to ethical care.

I am curious to know if the committee is aware of some of the unique challenges and issues the massage therapy board is tasked with.

* Working to prevent human trafficking: Unfortunately bad actors have co-opted our healthcare profession to serve as a cover for illicit activities. Frequently our agenda includes a list of people suspected of trying to fraudulently procure a massage license in Iowa. The board must review these applications to determine red flags, including comparing school transcripts with previously sanctioned "diploma mills," for example. The September 2023 board agenda lists several applicants for review by the board.

* Hearing claims of sexual assault and improper touch: because of the nature of massage therapy, it is important that board members understand what is and what is not typical, ethical, and safe professional conduct. The scope of practice for what would be ethical for a massage therapist is quite different than that for someone with a medical degree, like a physical therapist. The appropriate application and intent of techniques for pelvic floor work (including work inside the vagina or rectum) work on breast tissue (for example, post mastectomy scar work) massaging the muscle attachments near the pelvis for example, is quite nuanced. It is

helpful to hear from multiple massage therapy licensees to determine if a therapist violated standards of care or used techniques appropriate to their training and license.

* Diluting knowledge and understanding: As a licensed massage therapist, I had to Google respiratory therapy's scope of practice. It is so far from my knowledge base, that if I were to serve on a merged board I would not be able to determine what is not the standard of care or appropriate scope of practice for this field. I'm certain most LMTs would agree. I think the reverse of this is true as well.

* How will this impact the time it takes to investigate complaints? My service on the Iowa board of massage demonstrated how long it takes for a complaint to be received by the board, investigated, and resolved (including with a hearing, settlement, or closing the case) can take years. This is unfair to licensees, puts the public at risk, and places undue anxiety and burden on victims, especially in complaints alleging sexual misconduct.

* Would this be a large board? If only one licensee per profession serves on the board, there is a risk of actual or implied corruption or "turf guarding" as the scope of practice for many of the proposed merged professions is broad within each profession. Could one licensee determine what is currently typical standard of practice for their profession be deemed out-of-scope to reduce competition? Or could one individual champion a technique that would be able to safely be performed without a license or by someone with a different license in order to benefit their personal interest. It is important to prevent opportunities for individuals to wield too much power or control or champion unfair restrictions, which seems to be the exact opposite goal this committee is working toward.

Thank you for allowing me to share my thoughts with the board. I've requested a spot to speak on Wednesday and wanted to share my feedback in writing as well. Please consider the experience and expertise of licensed experts, and include them in the conversation as you continue modifying this proposal.

Sincerely,

A large black rectangular redaction box covering the signature area.

 my iPhone

From: [REDACTED]
[REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: merge of licensing boards: Chiropractic
Date: Fri Sep 01 2023 18:22:12 CDT
Attachments:

Dear Governor and the Boards and Commissions Review Committee,

I understand you are considering merging the Chiropractic board with PT, OT and massage therapy. I have been a Chiropractor for 28 years, serve on three Chiropractic related boards and teach continuing education classes across the country in the Thompson Technique, Thermography and Chiropractic philosophy. I come to you as someone who truly understands Chiropractic.

Chiropractic is a separate and distinct science. It is not a therapy or a treatment for medical conditions. Chiropractic science, art and philosophy focuses on the detection, location and adjustment of a Vertebral Subluxation. Our science is simple. There is intelligence in all living things. This innate inborn intelligence is what tells a fertilized egg to divide into two, then four and so on. Soon a nervous system is forming along with other organs until 40 weeks later a baby is born. The intelligence that formed a baby is still with us today. Chiropractors have the job of removing any interference or irritation in the nervous system so that prevents this intelligence from fully expressing itself in our bodies. Interference in the nervous system is caused by the vertebral subluxation. Chiropractors are the only profession specifically trained in locating and correcting subluxations. Subluxations are not merely fixated joints. The PT, OT and massage therapist do not have the same education and do not adjust vertebral subluxations.

In addition, Chiropractors do not need referrals from primary care doctors such as a PT or OT. We are a primary point of contact for patients. We can take x-rays in our offices and order imaging such as MRI and CT scans. Chiropractors are "doctorate-level" providers.

By lumping Chiropractic in with therapeutic methods, in the future, Chiropractors may lose the right to be a primary contact, lose the right to take x-rays or refer for x-rays and have scope expansion into areas that are not Chiropractic.

I understand the decisions you are forced to make for budgeting, efficiency and the betterment of operations within the state are important. Please keep in mind, however, that lumping Chiropractic with therapeutic models of care could very well lead to the end of the Chiropractic profession. Chiropractic began in Iowa, What a tragedy for the profession to be lost for all the Iowans who benefit from our unique science.

Please reach out to me if you have any questions about Chiropractic.

Warm Regards,



From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Comment Regarding the Elimination of the Elevator Safety Board
Date: Fri Sep 01 2023 18:27:27 CDT
Attachments: [REDACTED] Statement re Elimination of Elevator Safety Board.pdf

Please see the attached statement regarding the elimination of the Elevator Safety Board.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Owner:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Statement re Elimination of Elevator Safety Board.pdf

Last Modified:

Fri Sep 01 18:27:27 CDT 2023



I am a former Iowa Elevator Board member who served on the Elevator Safety Board from its inception in January of 2005 until April of 2022. I am a Union Representative for the International Union of Elevator Constructors and my position on the Board was a representative of workers who install, service and repair the conveyances covered by the Elevator Division. I worked in the field installing, servicing and repairing the very conveyances that the Board dealt with and could bring field experience into decisions made by the Elevator Safety Board.

Many do not understand the scope of the responsibilities of the Elevator Safety Board. The main responsibility is the adoption of codes and rules that assist the Division of Labor's Elevator Inspection Department in striving to make sure the conveyances covered are safe for not only the riding public but also the workers that install, maintain and repair the same. During my service on this Board, I feel the Board did an excellent job in achieving this. I personally took my responsibility in this position very seriously and understood that my job was not only to represent the workers that worked on the conveyances but also to protect the riding public. The safety of all residents of and visitors to the State of Iowa was a priority to me as a representative of this Board.

This Board had some very tough decisions that had to be made while I served on the Board and I feel that the Board performed its duties in a very professional and Democratic manor. I am not sure what the intentions are going forward without this Board in place to perform the duties assigned to it by law. The legislature has been able to review and approve all changes in fees, adoption of code and changes to rules recommended by the Elevator Safety Board.

The Elevator Safety Board also had the responsibility to consider and act on variance requests from code that is currently enforced by the Elevator Inspection Department and I feel that the Board has always been fair in its decisions with regards to variance requests.

The Elevator Safety Board also had very little cost to the State as we all served as volunteers on the Board. Some Board members serving may have charged some expenses for attending the meeting, but I must believe that was almost no one. I know that in the 17 years I served on the Board that I charged no expense for serving.

Having said all of this, I have a few questions for the Boards and Commissions Review Committee:

1. What does the Committee wish to achieve by the elimination of the Elevator Safety Board?
2. Who will take up the responsibilities performed by the Elevator Safety Board going forward?

I personally believe the Elevator Safety Board has done a great job representing the Citizens of the State of Iowa and that this Committee needs to keep the Elevator Safety Board in place.

Thank you for your time and consideration. If you have further questions for me, please do not hesitate to contact me.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc: [REDACTED]
Subject: Athletic trainers healthcare professionals
[REDACTED]

To whom it may concern:

I am very concerned about the proposal to eliminate state oversight of Athletic training healthcare professionals.;

Athletic trainers as clinicians and the Masters training program in Athletic training are critically important to the Department of Orthopedics and Rehabilitation. As clinicians they support our faculty in care delivery and provide primary care to injured athletes on the field, sideline and in the training room. They are important members of our musculoskeletal healthcare system. Educationally our three Athletic training faculty run an outstanding Master's Program that produces highly skilled graduates on a yearly basis. They are integral members of our faculty and their program fits well with the other educational programs in our department and in the College of Medicine.

Eliminating the board and licensing for Athletic training would be a step backward in healthcare regulation, allow athletic training to become a free for all in our state, increase the cost of care of injured athletes and decrease or eliminate our ability to work with these skilled providers. I believe it is very hard to predict all the negative effects of this proposed action. Our healthcare system depends on strong state boards to assure that all providers provide a safe and effective level of care and this regulation must continue to include Athletic Training.

Hopefully the proposed elimination of this board and licensure will be reconsidered and the idea will be discarded. I appreciate your thoughtful deliberation on this critically important issue.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Merger of the Chiropractic Board
Date: Fri Sep 01 2023 20:20:06 CDT
Attachments:

Dear BCRCC

Every board has its experts and its expertise in their field, their diluting that knowledge is detrimental to public safety and to licensure's in their field of study. Taxing the volunteers on the boards to be over worked because they simply do not have enough knowledge of nuances of each respective organization. This change is not in the best interest of lowans

Sincerely,

[REDACTED]

Sent from my iPhone

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Iowa Athletic Trainers Licensure Board
Date: Fri Sep 01 2023 21:06:23 CDT
Attachments: image001.png

To Whom It May Concern—

I hope my email finds you well and strikes you with impulse to act in the interest of the athletic training community of Iowa.

When I first heard that there was potential that our state licensing board would be eliminated, I was immediately concerned. Concerned for the future of athletes and performers, coaches, officials, military personnel, industrial employees, and so many other populations that athletic trainers serve in their professional roles.

You see, without a board to provide oversight for licensure and ensure that all athletic trainers are maintaining professional standards of care and staying prepared for emergent situations, I fear that these patient populations will suffer not only emergencies that could be prevented, but immediately addressed. These patients will not have access to crucial care to ensure they can return to their activity in timely fashion.

There are currently 1,129 AT licensed in the state of Iowa and countless students in educational programs who rely on licensing to learn from preceptors in those programs to continue to build upon a strong foundation. A licensure obtained through a governing board ensures each patient that falls under an athletic trainers' care that they will receive care from a professional who has been properly trained, continues education throughout their career, and holds themselves to the highest ethical standards.

Elimination of licensure in Iowa could have the potential to impact the ability of athletic trainers to practice in not only Iowa but also across state lines (traveling with teams), depending on regulatory requirements in other states.

Athletic trainers who are Board Certified and State Licensed are allied healthcare professionals who specialize in prevention, diagnosis and intervention of emergent, acute and chronic

medical conditions involving impairment, functional limitations and disabilities. Each athletic trainer has gone through a rigorous educational program, thousands of hours of observation in clinical situations, and passed a nationally recognized examination.

I fear that the elimination of Iowa Board of Athletic Training would be a grave mistake to not only the athletic population, but so many other patient populations who rely on athletic trainers to serve their needs.

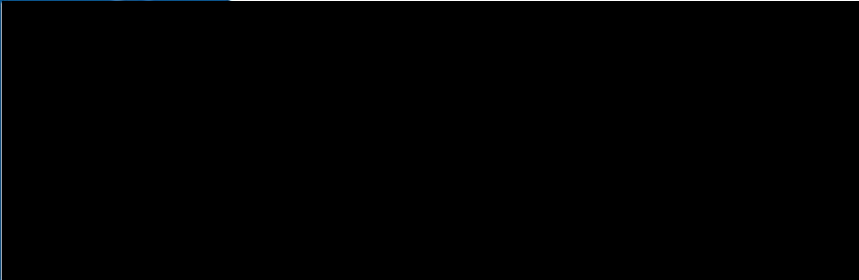
Thank you,

Owner:

[REDACTED]

Filename: image001.png

Last Modified: Fri Sep 01 21:06:23 CDT 2023



From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic Training licensure
Date: Fri Sep 01 2023 23:54:23 CDT
Attachments:

If you value the health and safety in sport and athletics at any level this is the most significant mistake a legislature can support. The field of athletic training, has a nomenclature that truly misrepresents the skill and care provided, is an allied health field bettering the well-being of those participating in athletics and life. This profession is skilled in many facets including injury prevention, evaluation and rehabilitation.

There are many skilled and educated professionals within the state that you should seek input from to protect those that participate in collegiate and scholastic athletics in Iowa. While this profession has worked to advance and has done so in the last decade there are many agendas from political and lobbyist that continue to demean the value of the services provided through these medical professionals.

Many have difficulty in describing all of the health related services provided by an ATHLETIC TRAINER, however WE are a jack of all trades but a MASTER of none, but ALWAYS better than a master of ONE. Think about being able to attend a primary care physicians that could evaluate, diagnose, and rehabilitate an Orthopaedic issue? This would not happen as they can only eval and diagnose. Think about going to a physical therapist to get an issue evaluated and treated, only they work based on a physician diagnosis. They are not trained in the on field evaluation that Athletic Trainers possess.

There is a place in the medical field for athletic healthcare and a referral process for the specialties that each are trained to perform. Athletic Trainers have a multifaceted education and understanding of roles. The inability to recognize the importance to maintain the licensure and regulation of this allied health field is a matter of public safety for those that cannot make that decision on their own.

There are many qualified professionals to speak with in regards to the impact this has on public safety within the state of Iowa. Please seek council from all major universities and high schools before making a rash decision that is driven by motives against the agenda of protecting a population that is not as educated in medicine.

If you would like to discuss my thoughts I can be contacted at 615-828-9873.

I am sure that the state and private universities as well as many high schools would not object to providing information as well.

[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Chiropractic board
Date: Sat Sep 02 2023 05:57:14 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.

This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions

We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,
[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Opposing the elimination of Athletic Trainer licensure
Date: Sat Sep 02 2023 07:23:25 CDT
Attachments:

I must oppose the elimination of licensure of Athletic Trainers. The health and welfare of all athletes and active people been understood for 30 years as LAT's cared for their safety and well-being. It is unfair to the LAT's and the people they care for and treat to eliminate this group from serving athletes and active people. Please consider keeping licensure for the benefit of all those are served by LATs.

Sent from Yahoo Mail for iPhone

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Licensure Changes
Date: Sat Sep 02 2023 07:54:04 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Board of Chiropractic/Licensure should not be combined and merged with any other boards. Having served 3 terms, appointed by 3 different Governors, 6 years as Chairman of Discipline and 3 years as Board Chairman, I can assure you these tasks are complex and need proper time, consideration & investigation. Every case is unique to its own profession. Having multiple professionals and public members from the other boards attempting to understand every situation of each others profession would be difficult. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Chiropractic License Board
Date: Sat Sep 02 2023 08:05:58 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]

To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>

Cc: [REDACTED]

Subject: Iowa Chiropractic Licensure Board
[REDACTED]

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: Sheets Chiropractic & Wellness Inc

[REDACTED]

To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Bcc:

Subject: Merger

Date: Sat Sep 02 2023 10:51:38 CDT

Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

Sent from my iPhone

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: REQUESTED ACTION: Opposition to Elimination of Iowa Board of Athletic Training
Date: Sat Sep 02 2023 10:53:02 CDT
Attachments:

Dear Members of the Boards and Commissions Review Committee,

I hope this email finds you well. My name is [REDACTED], and I am a Licensed Athletic Trainer in the State of Iowa, working for the largest employer of Athletic Trainers in the country, Athletico. I work along alongside 350 athletic trainers in our company, with 50 of those 350 teammates residing and practicing in Iowa. I am writing to express my deep concern and strong opposition to the recent consideration of eliminating the Iowa Board of Athletic Training.

The Athletic Training profession is composed of Certified and Licensed Athletic Trainers from professional, collegiate, and high school teams; industries; physician offices; rehabilitation clinics; and every branch of the United State military working together to promote and practice the profession of Athletic Training within the State of Iowa. Athletic Trainers have a long history of providing quality health care for athletes and persons engaged in regular physical activity. They are highly skilled licensed health care professionals who specialize in immediate, acute, and emergency care, examination, assessment, injury prevention, risk management, therapeutic intervention and rehabilitation of injury and illness. We are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS) & also carry National Provider Identifier numbers (NPIs). Lastly, the American Medical Association (AMA) also recognizes Athletic Trainers as an allied health care profession.

The National Athletic Trainers' Association (NATA) represents and supports more than 45,000 members of the Athletic Training profession, including more than 1129 licensed Athletic Trainers in the State of Iowa. Licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for health care professions. It also ensures clients and employers that an Athletic Trainer is properly trained, taking continuing education, and monitored. The associated Board of Athletic Training helps provide scope of practice guidance & protects the public from untrained persons. There is no expense associated with this Board. The fees that Athletic Trainers pay to renew their license cover all costs and year over year they are consistently in the black.

By eliminating the Board of Athletic Training and subsequent licensing for Athletic Trainers, we risk losing a dedicated group of professionals who are uniquely qualified to address the specialized needs of athletes and active individuals. Their knowledge in injury prevention, emergency response, and rehabilitation techniques is invaluable in safeguarding the health of those who rely on their expertise.

I urge this committee to reconsider this proposal and recognize the indispensable contributions that Athletic Trainers make to the communities of Iowa. Their skills and training are essential components of a comprehensive healthcare system that prioritizes the physical well-being of its citizens, especially in rural Iowa communities.

The move to eliminate the Board of Athletic Training is a backward movement in comparison to the rest of the country. Across the US, 49/50 states have some form of regulation of the profession athletic training. The one remaining state has an active bill which would require regulation of the practice of athletic training. Licensure is required in 47/50 states. Thus, by moving away from licensing athletic trainers in our state, we would be moving in the opposite direction of everyone else and in this case, being different is not a good thing.

In conclusion, I stand firmly against the elimination of the Iowa Board of Athletic Training and implore the Board to continue supporting this critical profession. Let us work together to ensure that athletes and active individuals throughout the state continue to receive the highest standard of care.

Respectfully,

[Redacted signature]

[Redacted address line 1]

[Redacted address line 2]

This message may contain information that is confidential, privileged, or otherwise protected from disclosure. If this message contains Protected Health Information, its acquisition, transmission, storage and use is protected by HIPAA. If you are not the intended recipient, any review, disclosure, copying, or distribution, of this material is strictly prohibited. If you receive this message in error or are not the named recipient(s), please contact the sender immediately and delete this message. Thank you for your cooperation.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: REQUESTED ACTION: Opposition to Elimination of Iowa Board of Athletic Training
Date: Sat Sep 02 2023 12:58:43 CDT
Attachments:

Dear Members of the Boards and Commissions Review Committee,

I hope this email finds you well. My name is [REDACTED], and I am a Licensed Athletic Trainer in the State of Iowa, working for the largest employer of Athletic Trainers in the country, Athletico. I work along alongside 350 athletic trainers in our company, with 50 of those 350 teammates residing and practicing in Iowa. I am writing to express my deep concern and strong opposition to the recent consideration of eliminating the Iowa Board of Athletic Training.

The Athletic Training profession is composed of Certified and Licensed Athletic Trainers from professional, collegiate, and high school teams; industries; physician offices; rehabilitation clinics; and every branch of the United State military working together to promote and practice the profession of Athletic Training within the State of Iowa. Athletic Trainers have a long history of providing quality health care for athletes and persons engaged in regular physical activity. They are highly skilled licensed health care professionals who specialize in immediate, acute, and emergency care, examination, assessment, injury prevention, risk management, therapeutic intervention and rehabilitation of injury and illness. We are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS) & also carry National Provider Identifier numbers (NPIs). Lastly, the American Medical Association (AMA) also recognizes Athletic Trainers as an allied health care profession.

The National Athletic Trainers' Association (NATA) represents and supports more than 45,000 members of the Athletic Training profession, including more than 1129 licensed Athletic Trainers in the State of Iowa. Licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for health care professions. It also ensures clients and employers that an Athletic Trainer is properly trained, taking continuing education, and monitored. The associated Board of Athletic Training helps provide scope of practice guidance & protects the public from untrained persons. There is no expense associated with this Board. The fees that Athletic Trainers pay to renew their license cover all

costs and year over year they are consistently in the black.

By eliminating the Board of Athletic Training and subsequent licensing for Athletic Trainers, we risk losing a dedicated group of professionals who are uniquely qualified to address the specialized needs of athletes and active individuals. Their knowledge in injury prevention, emergency response, and rehabilitation techniques is invaluable in safeguarding the health of those who rely on their expertise.

I urge this committee to reconsider this proposal and recognize the indispensable contributions that Athletic Trainers make to the communities of Iowa. Their skills and training are essential components of a comprehensive healthcare system that prioritizes the physical well-being of its citizens, especially in rural Iowa communities.

The move to eliminate the Board of Athletic Training is a backward movement in comparison to the rest of the country. Across the US, 49/50 states have some form of regulation of the profession athletic training. The one remaining state has an active bill which would require regulation of the practice of athletic training. Licensure is required in 47/50 states. Thus, by moving away from licensing athletic trainers in our state, we would be moving in the opposite direction of everyone else and in this case, being different is not a good thing.

In conclusion, I stand firmly against the elimination of the Iowa Board of Athletic Training and implore the Board to continue supporting this critical profession. Let us work together to ensure that athletes and active individuals throughout the state continue to receive the highest standard of care.

Respectfully,



This message may contain information that is confidential, privileged, or otherwise protected from disclosure. If this message contains Protected Health Information, its acquisition, transmission, storage and use is protected by HIPAA. If you are not the intended recipient, any review, disclosure, copying, or distribution, of this material is strictly prohibited. If you receive this message in error or are not the named recipient(s), please contact the sender immediately and delete this message. Thank you for your cooperation.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic Training Licensure
Date: Sat Sep 02 2023 14:00:05 CDT
Attachments:

To whom it may concern,
I am writing in regards to the proposal to discontinue licensure for athletic trainers in the state of Iowa. This would be a major setback for athletic trainers as well as the safety of athletes in the state of Iowa. Licensure sets a standard and puts the burden of proof onto the health care provider to prove that they have the education and certifications to perform the duties of the job. It keeps the public safe from people who just want to be part of the sporting culture but don't have knowledge in how to recognize, mitigate and treat sporting injuries as minor as a muscle strain up to and including heat stroke, sudden cardiac arrest, and concussions. Having a improperly educated person in the position of "team trainer" or "athletic trainer" can be the difference between life and death for athletes unbeknownst to the athletes or their parents. Just as when you go to the Doctor you trust that they have met the requirements to sit for and passed their medical boards and are truly legal to act as a physician. Licensure allows the public to know that the professional tasked with keeping the athletes performing safely on and off the field, knows what they are looking for and how to address any issues as they arise!

Thank you for taking the time to consider the importance of state licensure for every healthcare provider nationwide, and in this instance specifically for Iowa.

Sincerely,
[REDACTED]

Get Outlook for iOS

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Please Do not eliminate boards!
Date: Sat Sep 02 2023 15:08:32 CDT
Attachments:

Hello,
I am a licensed Physical Therapist and I do not support eliminating the athletic training board and many of the other boards in Iowa that protect Iowans safety, health, and environment. Legislators are not experts in the many departments and jobs and services it takes to have a functioning society. They need input from experts in their specific fields. Legislators need to utilize these boards for their wisdom and safety checks to keep Iowans safe now and in the future. I do not support the reorganization and elimination of these boards. Future Iowans will pay for these mistakes, and maybe even with their lives.
Sincerely,
[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Massage Board Consolidation
Date: Sat Sep 02 2023 15:26:06 CDT
Attachments:

I have been a licensed massage therapist since September 2015. I oppose the consolidation. There are distinct differences between massage therapy, chiropractic care, and respiratory care. There is some overlap between massage therapy and physical therapy. Physical therapists and massage therapists practice some of the same manual techniques. Physical therapists are more advanced in education and skill than massage therapists. I still think there should be different boards for physical therapists and massage therapists, but that would be the only consolidation that I think would make any practical sense.

[REDACTED]

From:

[REDACTED]

To:

BCRCcomments@iowa.Gov
<bcrccomments@iowa.gov>

Cc:

[REDACTED]

Subject:

Consideration to Eliminate Board of Hearing Aid Specialists

[REDACTED]

To whom it may concern:

Please call:

United Healthcare Hearing 855-523-9355

Nations Hearing 877-439-2665

Ask them if they prefer state licensed hearing aid specialists to deliver hearing instruments and professional follow up care

to their thousands of customers; or, will anyone off the street be acceptable!

I believe they will answer resoundingly in preferring state licensed, professionally trained hearing specialists!

Please do not eliminate the Board of Hearing Specialists; Vote to protect hearing impaired Iowans.

Sincerely,

[REDACTED]

[REDACTED]

From:

[REDACTED]

To:

BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Subject:

Athletic Training Board retention
[REDACTED]

Good Afternoon,

I am reaching out to strongly encourage you to fight for the Iowa Boards for Athletic Trainers to remain in place. We have been working very hard at the state and national levels to even the playing field with other health care professions. The athletic training field now requires a master's degree, just as other allied professions do. We have also expanded the areas and locations our scope of practice can be used in to prevent, reduce, and/or aid in the patients return to work, learn, or sport. The State Board and licensure ensures our athletic trainers have the proper knowledge to uphold a standard of care that will keep those they are helping safe and we continue to be an properly acknowledged division of the health care field. Thank you for you time , effort, and support on helping us uphold the high standards of care our patients and athletes deserve in the state of Iowa.

Respectfully yours,

Kayla Muselman M.Ed., LAT, ATC

[REDACTED]

[REDACTED]

[REDACTED]

From:

[REDACTED]
[REDACTED]
<bcrccomments@iowa.gov>; scott.webster@legis.iowa.gov
<scott.webster@legis.iowa.gov>; gary.mohr@legis.iowa.gov
<gary.mohr@legis.iowa.gov>

Cc:

Bcc:

Subject: Requesting Committee's Support for the Continuation of the Iowa Board of Athletic Training

Date: Sat Sep 02 2023 20:49:34 CDT

Attachments: image001.png

Dear Members of the Boards and Commissions Review Committee,

I'm an Associate Director for the University of Iowa Department of Orthopedics and Rehabilitation, and am responsible for administrative oversight for athletic training programs in the University of Iowa Carver College of Medicine and University of Iowa Hospitals and Clinics. Our programs include a Master of Science in Athletic Training, an Athletic Training Residency Program, Athletic Trainers in the clinical practice setting (providing staff support in our University of Iowa Hospitals and Clinics) and UI Sports Medicine Outreach (providing medical support to athletes in high schools.)

I'm writing in opposition of the proposed elimination of the Iowa Board of Athletic Training. Please consider these consequences to elimination of this Board and the impact on removal of AT licensure:

Professional Standards: Licensure ensures that athletic trainers meet and adhere to the required professional standards and competencies. This guarantees that they possess the necessary knowledge and skills to provide safe and effective care.

Public Safety: By requiring athletic trainers to maintain licensure, the public can be confident that they are receiving care from individuals who are up-to-date with the latest evidence-based practices and safety protocols.

Possible Impact on Liability and Malpractice Coverage: Athletic trainers practice under the supervision of a physician. Elimination of licensure may influence the scope and nature of malpractice coverage. Maintaining an active license demonstrates adherence to recognized professional standards, which can be a critical factor when insurance providers assess malpractice coverage and rates. Additionally, without licensure, an athletic trainer could inadvertently jeopardize both their and their supervising physician's coverage in the event of a claim.

Credibility & Trust: Licensure adds a level of professional credibility. Athletes, coaches, and other stakeholders are more likely to trust and respect the advice and treatment provided by a licensed professional.

Continuing Education: Maintaining licensure requires continuing education. This ensures that athletic trainers stay current with the evolving field of sports medicine, emerging research, and best practices.

Recruitment for University of Iowa Educational Programs: Eliminating licensure standards would have a negative impact on the University of Iowa's training programs and ability to maintain Athletic Trainers in the State following program completion. A rigorous and recognized licensure process serves as a benchmark of program quality, drawing in students who are serious about their careers in athletic training and looking for top-tier education and training.

Vital for Medical Clinic Staffing: In addition to traditional roles, athletic trainers, with their specialized skill set, are becoming an integral solution to staffing needs in various medical clinics. A valid license assures clinics of an individual's competency and up-to-date knowledge, streamlining the hiring process and ensuring that patients receive the highest quality care. As the healthcare landscape evolves, the role of licensed athletic trainers in these settings will continue to expand, making them indispensable to the efficient functioning of many medical facilities.

In summary, maintaining licensure for athletic trainers is not just a bureaucratic necessity; it's a foundational aspect of ensuring the best care for patients and athletes in the State of Iowa and upholding the integrity of the profession.

Please contact me with any questions, and thank you for your support of this important Board.

[REDACTED]

[REDACTED]

[REDACTED]

University of Iowa Health Care named by Forbes as one of “America’s Best Large Employers

Owner:

[REDACTED]

Filename: image001.png

Last Modified: Sat Sep 02 20:49:34 CDT 2023

image001.png for Printed Item
361 (Attachment 1 of 1)

Page 596 of 1221

From: [REDACTED]
To: BCRCcomments@iowa.gov
<brcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Comments on the Board and Commissions Review Committee Findings
Date: Sat Sep 02 2023 21:26:10 CDT
Attachments:

Hello,

My name is [REDACTED]. I am unable to attend the in-person meeting but wanted to provide my comments on the findings of the Board and Commissions review Committee.

I cannot speak for all of the boards listed, and I can appreciate that the Committee is trying to optimize our state government and eliminate waste. However, it is deeply concerning to me to see that the Committee has recommended eliminating boards that are related to Public Safety.

First, the Boiler and Pressure Vessel Board - this board manages "safe and proper installation, repair, maintenance, alteration, use, and operation of boilers and pressure vessels in this state." (Iowa Code 89.14). Many of the boilers under this board's jurisdiction are used to generate high pressure steam for use in power generation and industrial processes. Failure to properly install, maintain, and operate these boilers can result in explosions that can seriously injure or kill those nearby. My concern is that eliminating this board will result in boilers that are not properly installed, maintained, and operated, increasing the risk of having an explosion occur.

Likewise, it is concerning to see elimination proposed for the Elevator Safety Board. When I enter an elevator the first thing I do is look for the permit indicating that the elevator has been inspected and approved for operation. My concern here is that eliminating this board will allow elevators to be operated without appropriate inspections and repairs, increasing the risk of failures that could cause injury or death to those inside the elevator car.

It is also concerning to see the proposed consolidation of several of the examining boards. Among these are the Engineering and Land Surveying Examining Board, I am a practicing mechanical engineer and received my Iowa license from the Engineering and Land Surveying Examining Board. A robust engineering license system ensures that bridges and roads are designed and constructed safely, ensures that ventilation and plumbing systems are appropriately designed for safety and comfort, and ensures that power plants and industrial plants are also designed safely. Any action that weakens the authority of the Engineering and Land Surveying Examining Board or our engineering licensure system will have detrimental impacts on the public.

As I mentioned earlier, I cannot speak for all the boards, but I listed those that I have either had personal experience with, or stood out to me as integral to public safety. Any action taken that would weaken the authority of these boards that ensure public safety would be a grave

mistake.

Thank you for taking the time to listen to/read my comments.

Best Regards,

A black rectangular redaction box covering the signature of the sender.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Keep licensing for AT's!
Date: Sat Sep 02 2023 21:42:11 CDT
Attachments:

- * We currently have 1,129 ATs who are licensed and countless students who rely on licensing.
- * That licensure protects the public and lets clients and employers easily know an AT is properly trained, taking continuing education, and monitored.
- * The Board helps provide scope of practice guidance and protects the public from untrained persons
- * There is no expense associated with the Board of Athletic Training. The fees that ATs pay to renew their license cover all costs. They are cost-effective and are consistently in the black each year.
- * Every state and Washington D.C require licensure for ATs, except for Hawaii (which requires registration) and California (who has pending legislation).
- * Athletic trainers are healthcare professionals who specialize in the prevention, diagnosis and intervention of emergent, acute and chronic medical conditions involving impairment, functional limitations and disabilities. (you could include your educational requirements here)
- * Athletic trainers provide medical services to all types of patients. Across the United States, in addition to practicing in traditional sports team settings, athletic trainers work in performing arts, public safety, occupational health, and with the armed forces. (Here is some statistical data on AT settings: <https://members.nata.org/members1/documents/membstats/index.cfm>. You will need to be logged into the website to access this page. Click on the July 2023 link, and "JobSettingCertified" at the very bottom of the page.)
- * Licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.
- * Eliminating licensure in IA could potentially impact an AT's ability to practice across state lines (travel with their team), depending on regulatory requirements in other states. (ex. some states allow you to practice in their state temporarily, provided your home state maintains the

same regulatory requirements

Thanks for your consideration,



Get Outlook for Android

From:

[Redacted]

To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Bcc:

Subject: Deregulation

Date: Sat Sep 02 2023 22:57:06 CDT

Attachments:

Hello, I have been a Hearing Instrument Specialist for 10 yrs. I find it very disturbing that this profession could be deregulated.

There are many reasons that this could be dangerous to our patients.

Being licensed makes sure that you look for red flags during the otoscopy.

Impacted wax, infections, something that does not look normal.

Not performing the making of impressions correctly, could be very dangerous.

There are just so many things that have to be done correctly to protecting our patients.

Thank you for your time.

From: [REDACTED]
[REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc: [REDACTED]
Bcc:
Subject: Iowa Chiropractic Licensure Board
Date: Sun Sep 03 2023 06:45:47 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Lastly, chiropractic is a separate and distinct legal entity in healthcare from mainstream medicine due to a difference in healthcare philosophy. Mechanistic verses holistic. Due to this fact, the governing board should reflect that philosophical understanding, and therefore must remain separate and distinct. Chiropractic does not fall under the realm of the medical system like the PT and OT aspects of healthcare do.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
[REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc: [REDACTED]
Subject: Protect dietitians and athletic trainers
[REDACTED]

Hello,

My name is [REDACTED], and I am a physician assistant and dietitian working in the area of orthopedics at the University of Iowa. I'd like to express my concern regarding the elimination of the board and licensing for both dietitians and athletic trainers.

There's a significant and honestly dangerous educational divide between registered dietitians and other "nutrition professionals", and allowing those professionals to practice at the same level of RDs would be very detrimental in the area of nutrition science -- an area of science and medicine that always struggles to get buy-in from the public when it comes to evidence based nutrition information.

- * Having proper oversight of dietitians means protecting against unsafe or inaccurate nutrition counseling or interventions that may lead to poor or even dangerous health outcomes
- * It helps to prevent the use or recommendation of unnecessary and often expensive products or services
- * We want to know that dietitians have the objective accredited education, experience and examination that demonstrates competency to provide services with their scope of practice

Similarly, eliminating oversight for athletic trainers will have detrimental effects. Eliminating the board and licensing for Athletic training would be a step backward in healthcare regulation, allow athletic training to become a free for all in our state, increase the cost of care of injured athletes and decrease or eliminate our ability to work with these skilled providers.

I would strongly encourage you to reconsider putting these two vital boards on the chopping block. Their skills are critically important to providing quality healthcare, and changes here have the very real potential to cause harm to patients.

Thank you,
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] for iOS

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic trainers
Date: Sun Sep 03 2023 10:16:46 CDT
Attachments:

To Whom it May Concern:

Please keep licensing standards for athletic trainers in place. They are an integral part of high school sports. Kids are still growing and could negatively be impacted by an uninformed decision after an illness or injury. Please do not get rid of current licensure requirements that are in place. Educated, licensed trainers are necessary to have on staff.

Thank you.

[REDACTED]

Sent from AOL on Android

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Elimination of Boiler and Pressure Vessel Board
Date: Sun Sep 03 2023 11:40:04 CDT
Attachments:

Regarding the Boards and Commissions Review Committee recommendation to eliminate the Boiler and Pressure Vessel Board, I recommend that you keep this vital board in place. I have served on this board since its inception, and we have provided valuable service and consultations to the Iowa Boiler program.

The BPV Board is well-positioned to function as an extremely cost-effective consultative group, offering assistance and guidance from experts in multiple fields relating to this important equipment that is used throughout the state. Boilers and pressure vessels are vital to schools, churches, and industrial and commercial settings. Technology affecting this equipment is constantly changing, requiring up-to-date administrative rules with on-going reviews. Utilizing our many years of experience, both educationally and in the field, the Board members assist the boiler program with current and valuable updates to provide both safe and cost-effective oversight of potentially dangerous equipment.

To eliminate this board as a cost saving effort appears to be counterintuitive. The Board consists of members of diverse industries concerned with boiler and pressure vessel installation, operation, inspection, repairing, and manufacturing. We serve with no compensation; we are only mandated to meet once a quarter with more frequent meetings called as business requires. We meet via Zoom or other web-based meeting facilities so members can attend without additional time away from their jobs driving to a central meeting point. The State benefits from consultations from industry experts without paying consultation fees.

Why would you eliminate such a cost-effective benefit to lowans?

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

IMPORTANT NOTICE:

This email (including any attachments) contains confidential and proprietary information that is intended only for the individual or entity designated above. If you are not the intended recipient, please be aware that any use, review, distribution, reproduction, copying, or action taken in reliance upon this email is strictly prohibited. If you received this email in error, please notify the sender immediately, and permanently delete and destroy this email and any hard and electronic copies thereof. Although we have taken reasonable precautions to reduce the risk of transmitting software viruses, it is the responsibility of the recipient to ensure that this email is virus-free. The [REDACTED] (including its subsidiaries and affiliates) disclaims any and all liability for any loss or damage caused by this email whether due to viruses, interference, interception, data corruption, unapproved access, misrepresentation, or otherwise.

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Midwifery Advisory Council to be retained comment submission
Date: Sun Sep 03 2023 11:55:48 CDT
Attachments:

Dear BCRC,

Please retain the Midwifery Advisory Council to ensure the most qualified lowans are advising on issues impacting the non-nurse midwifery workforce and to reduce barriers to entry into the Certified Professional Midwife workforce, which is positioned to see an increase in the state once licensure is available in July 2024.

Thanks,

[REDACTED]

Sent from my iPhone

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Board that oversees Athletic Trainers
Date: Sun Sep 03 2023 12:10:39 CDT
Attachments:

Please, do not do away with the board that oversees Athletic Trainers. As first line responders to emergency situations at athletic events, they need to be trained professionals, who have proven to a governing board that they know what to do in these emergency situations! The life of a child or young adult may lay in their hands! I urge you to think about what taking away this board means to the safety of sports all across this great state! As a parent, there is some level of comfort knowing professionals in the medical field are present and competent to provide that front line care in an emergency! Just a few short years ago a decision was made to extend the education need for Athletic Trainers. It was decided they needed the additional training to provide the critical care necessary. What has changed now? Why is it now a good idea to do away with an agency that regulates the training of these professionals? Thank you for your time. I trust you will do what is best for the health and safety of our state!

[REDACTED]

Sent from my iPhone

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: input on boards and committees
Date: Sun Sep 03 2023 12:43:26 CDT
Attachments:

I am writing to provide input regarding the change based on the Boards and Commission Review Committee. Although I understand the importance of streamlining for efficiency and effectiveness for some of the boards and commissions, it is a public safety concern to change the way the Iowa Board of Nursing (IBON) has operationalized. The Iowa Board of Nursing is a national leader amongst the National Council for State Boards of Nursing and has rigorous review, accountability, and commitment to serve the people and profession in this state. Please strongly consider omitting the IBON from your changes and recommendations.

Thank you,
[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic Training Licensure Consideration
Date: Sun Sep 03 2023 13:05:48 CDT
Attachments: Outlook-3chj2enk.jpg
Outlook-41dkgmqf.png
Outlook-gckm0veh.jpg
Outlook-nh0hnjxg.png

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

To Whom it May Concern,

I am very concerned about the proposal to eliminate state oversight of Athletic Training healthcare professionals.

Athletic trainers as clinicians and the Master's program in Athletic training are critically important to the Department of Orthopedics and Rehabilitation. As clinicians, they support our faculty in care delivery and provide primary care to injured athletes on the field, sideline, and in the athletic training room. As an athletic trainer myself, I know the importance of my role to the athletes at the University of Iowa and other members of the community. We are important members of any musculoskeletal healthcare system. Educationally, our three Athletic training faculty run an outstanding master's Program that produces highly skilled graduates on a yearly

basis. They are integral members of our faculty, and their program fits well with the other educational programs in our department and in the College of Medicine.

Eliminating the board and licensing for Athletic training would be a step backward in healthcare regulation, allow athletic training to become a free for all in our state, increase the cost of care of injured athletes and decrease or eliminate our ability to work with these skilled providers. I believe it is very hard to predict all the negative effects of this proposed action. Our healthcare system depends on strong state boards to assure that all providers provide a safe and effective level of care, and this regulation must continue to include Athletic Training.

Hopefully the proposed elimination of this board and licensure will be reconsidered and the idea will be discarded. I appreciate your thoughtful deliberation on this critically important issue.

Owner:

[REDACTED]

Filename: Outlook-3chj2enk.jpg

Last Modified: Sun Sep 03 13:05:48 CDT 2023

[Redacted]

[Redacted]

Owner:

[REDACTED]

Filename: Outlook-41dkgmqf.png

Last Modified: Sun Sep 03 13:05:48 CDT 2023

Owner:

[REDACTED]

Filename: Outlook-gckm0veh.jpg

Last Modified: Sun Sep 03 13:05:48 CDT 2023

LET'S GO HAWKS

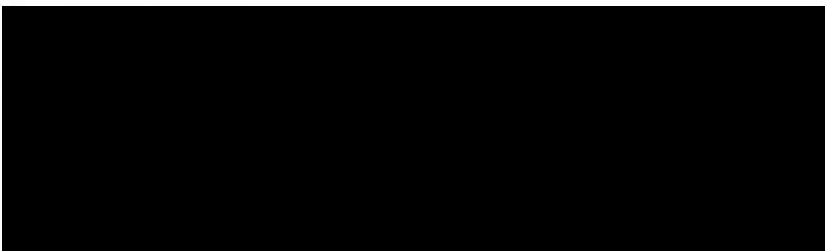
Owner:

[REDACTED]

Filename: Outlook-nh0hnjxg.png

Last Modified: Sun Sep 03 13:05:48 CDT 2023

Outlook-nh0hnjxg.png for Printed Ite



From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Boards and Commissions meeting 9/6/2023
Date: Sun Sep 03 2023 13:12:32 CDT
Attachments:

I would like to offer comments at the Boards and Commissions meeting on 9/6/2023. Hopefully you are offering teleconference capabilities for speakers, as I cannot join in person.

I am currently chairman of the Boiler and Pressure Vessel Board.

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: The Iowa Senate File 514 - letter
Date: Sun Sep 03 2023 13:14:03 CDT
Attachments:

To whom it may concern:

I am very concerned about the proposal to eliminate state oversight of Athletic training healthcare professionals.

The Department of Orthopedics and Rehabilitation places a high value on athletic trainers as clinicians and the Masters degree in athletic training. In their capacity as clinicians, they assist our professors in the delivery of healthcare and offer primary care to hurt athletes on the field, in the stands, and in the weight room. They play a crucial role in the musculoskeletal healthcare system. In terms of education, our three athletic training faculty conduct a fantastic master's program that consistently turns out highly qualified graduates. They are essential members of our faculty, and their course of study complements those offered by the College of Medicine and by the rest of our department.

Eliminating the athletic training board and license would be a step backward in healthcare regulation, and cause athletic training to become a free-for-all in our state. It would increase the expense of care for injured athletes, and reduce or remove our ability to collaborate with these qualified professionals. I believe it is very hard to predict all the negative effects of this proposed action, and I cannot think of one positive thing to come out of it. Our healthcare system depends on strong state boards to ensure that all providers deliver a high standard of safe and effective care, and athletic training must continue to be covered by this regulation.

Hopefully, the proposed elimination of this board and licensure will be reconsidered and the idea will be discarded. I appreciate your thoughtful deliberation on this critically important issue.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Licensure Board
Date: Sun Sep 03 2023 13:25:33 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Protect Iowa Athletic Training Licensure!
Date: Sun Sep 03 2023 18:37:22 CDT
Attachments:

To whom it may concern:

I am very concerned about the proposal to eliminate state oversight of Athletic training healthcare professionals.;

Athletic trainers as clinicians and the Masters training program in Athletic training are critically important to the Department of Orthopedics and Rehabilitation. As clinicians they support our faculty in care delivery and provide primary care to injured athletes on the field, sideline and in the training room. They are important members of our musculoskeletal healthcare system. Educationally our three Athletic training faculty run an outstanding Master's Program that produces highly skilled graduates on a yearly basis. They are integral members of our faculty and their program fits well with the other educational programs in our department and in the College of Medicine.

Eliminating the board and licensing for Athletic training would be a step backward in healthcare regulation, allow athletic training to become a free for all in our state, increase the cost of care of injured athletes and decrease or eliminate our ability to work with these skilled providers. I believe it is very hard to predict all the negative effects of this proposed action. Our healthcare system depends on strong state boards to assure that all providers provide a safe and effective level of care and this regulation must continue to include Athletic Training.

Hopefully the proposed elimination of this board and licensure will be reconsidered and the idea will be discarded. I appreciate your thoughtful deliberation on this critically important issue.

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Licensing board reviews
Date: Sun Sep 03 2023 19:24:00 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

CONFIDENTIALITY NOTICE: This email, and any attachments hereto, contains information which may be CONFIDENTIAL. The information is intended to be for the use of the individual or entity named above. If you are not the intended recipient, please note that any unauthorized disclosure, copying, distribution or use of the information is prohibited. If you have received this electronic transmission in error, please return the email to the sender and delete it from your computer.

From:

[REDACTED]

To:

bcrccomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Bcc:

Subject: Comment

Date: Sun Sep 03 2023 19:49:47 CDT

Attachments:

To whom it may concern,

Do not change anything about the Deaf Services Commission of Iowa, nor the Interpreter/Transliterator Licensure Board.

[REDACTED], long time Iowa Resident and Iowa worker.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: KEEP Athletic training licensure
Date: Sun Sep 03 2023 20:52:57 CDT
Attachments:

To Kim Reynolds and the Iowa Board:

It has come to my attention that an elimination of the requirements for becoming an athletic trainer in the state of Iowa has taken place. Athletic training is a HEALTHCARE field. Requirement of licensure needs to be kept in place in order to ensure physical and sexual harm does not take place in our schools. Athletic trainers go through extensive anatomy, physiology, kinesiology, biology, and sports classes. Below are some other good points to why the licensure requirement is a MUST.

We currently have 1,129 ATs who are licensed and countless students who rely on licensing.

That licensure protects the public and lets clients and employers easily know an AT is properly trained, taking continuing education, and monitored.

The Board helps provide scope of practice guidance and protects the public from untrained persons

There is no expense associated with the Board of Athletic Training. The fees that ATs pay to renew their license cover all costs. They are cost-effective and are consistently in the black each year.

Every state and Washington D.C require licensure for ATs, except for Hawaii (which requires registration) and California (who has pending legislation).

Athletic trainers are healthcare professionals who specialize in the prevention, diagnosis and intervention of emergent, acute and chronic medical conditions involving impairment, functional limitations and disabilities. (you could include your educational requirements here)

Athletic trainers provide medical services to all types of patients. Across the United States, in addition to practicing in traditional sports team settings, athletic trainers work in performing arts, public safety, occupational health, and with the armed forces. (Here is some statistical data on AT settings: <https://members.nata.org/members1/documents/membstats/index.cfm>. You will need to be logged into the website to access this page. Click on the July 2023 link, and "JobSettingCertified" at the very bottom of the page.)

Licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for health care professions. Athletic trainers are included under the

allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.

Eliminating licensure in IA could potentially impact an AT's ability to practice across state lines (travel with their team), depending on regulatory requirements in other states. (ex. some states allow you to practice in their state temporarily, provided your home state maintains the same regulatory requirements)

Regards,

 n

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Preliminary Report
Date: Sun Sep 03 2023 22:28:13 CDT
Attachments:

The preliminary report includes a recommendation concerning the Iowa Civil Rights Commission. It reads "Reorganize/other changes." Is more detail avail? Thanks, [REDACTED]
[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc: gary.mohr@legis.iowa.gov
<gary.mohr@legis.iowa.gov>; scott.webster@legis.iowa.gov
<scott.webster@legis.iowa.gov>
Bcc:
Subject: Iowa Board of Athletic Training
Date: Mon Sep 04 2023 07:46:16 CDT
Attachments:

Good Morning & Happy Labor Day!

I am writing to you from my office at Bettendorf High School 3333 18th St. Bettendorf Iowa. I am at work this morning, on Labor Day and one of many holidays, evenings, and weekends I miss with my family and friends, to keep young lowan athletes safe. I understand the Iowa Boards and Commissions Review Committee has recommended eliminating over 140 boards/commissions. I am writing to ask that you NOT SUPPORT the elimination of the Iowa Board of Athletic Training or the requirement for Licensure to work in the State of Iowa as an Athletic Trainer.

Eliminating the Athletic Training Board and the need for licensure would be a backwards step in providing qualified health care to lowans. 47 states and the District of Columbia require licensure for athletic trainers. Of the 3 remaining non-licensure states, New York has a licensure bill awaiting the Governor's signature and California has pending legislation. Hawaii, the third non-licensure state, only requires registration.

Athletic trainers are healthcare professionals who specialize in the prevention, diagnosis and intervention of emergent, acute and chronic medical conditions involving impairment, functional limitations and disabilities. This profession is vast in knowledge necessary and therefore requires a Master's Degree. Athletic trainers provide medical services to all types of patients. In some cases, Athletic Trainers provide healthcare to athletes in rural areas and underserved communities. Across the United States, in addition to practicing in traditional sports team settings, athletic trainers work in performing arts, public safety, occupational health, and with the armed forces. Licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for health care professions. Without regulatory board or licensure requirement, individuals could present themselves as qualified professionals to provide the services listed above. This puts lowans at risk of being improperly treated in cases of injury or emergency.

Athletic trainers are included under the allied health professions category, as defined by the U. S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession. Eliminating licensure in IA could potentially impact an Athletic Trainers ability to practice across state lines (travel with their team), depending on regulatory requirements in other states. (ex. some states allow you to practice in their state temporarily, provided the home state maintains the same regulatory requirements

Thank you for taking the time to read this long-winded email. I hope you can feel my concern regarding what impact removing our Board and licensure requirements may have on not only our profession but on the citizens of Iowa.

Sincerely,

A large black rectangular redaction box covers the signature area, obscuring the name and any handwritten notes.

Confidentiality Notice: This email and any attachments are covered by the Electronic Communications Privacy Act, 18 U.S.C. §§2510-2521 and contain privileged and confidential information intended only for the use of the individual or entity named. If you are not the intended recipient, you are hereby notified that you should not review, use, disclose, distribute, copy, or forward this email. If you have received this email in error, please notify the sender immediately and delete/destroy any and all copies of the original message.

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Preserve the Deaf Services Commission of Iowa and the Board of Licensure
for Sign Language Interpreters and Transliterators
Date: Mon Sep 04 2023 09:20:08 CDT
Attachments:

I write to urge the State of Iowa to preserve its governmental agencies that serve deaf people in Iowa.

As a rabbi, I see issues through a theological lens. Deaf and Hard of Hearing people are in fact people, equally created in the image of God. Our scriptures, including the Holiness Code, exhort us to offer special protections as needed to people who are Deaf. We need the Commission to ensure that our government is always mindful of the special needs of those who are deaf or hard of hearing, and we need the Board of Licensure to ensure that those who provide interpreting services are competent and ethical in providing these essential services for the Deaf and Hard of Hearing to interact with the hearing world. God forbid that we should make Iowa a state that cannot provide a suitable home for families with members who are deaf!

But one need not look at this through religious eyes to see that providing services that allow Deaf and Hard of Hearing people to educate themselves to their greatest capacity and to interact with the hearing world well is simply the right thing to do, both morally and practically. Why should we be so cruel as to cut off Deaf people from the rest of our Iowan people? Why would we be so shortsighted as to waste the intelligence and talents and skills of passions of those Iowans who are deaf or hard of hearing?

Please, please, preserve the Deaf Services and Commission and the Board of Licensure for Sign Language Interpreters and Transliterators.

Thank you for your consideration.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From:

[Redacted]

To: BCRComments@iowa.gov
<bcrcomments@iowa.gov>

Cc:

Bcc:

Subject: letter in opposition of deregulation in hearing instrument specialists

Date: Mon Sep 04 2023 10:21:37 CDT

Attachments:

Letter in op of HIS.docx

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<brcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Licensed Hearing Instrument Dispenser
Date: Mon Sep 04 2023 10:57:18 CDT
Attachments:

Governor Reynolds,

I live and work in Illinois but I was raised in Iowa and raised my family there. I have a BA degree in Psychology and Human Services and worked for many years in Iowa with families and children and as an office manager for a Chiropractor and a Psychology group. I have a broad range of experience. I became licensed as a Hearing Instrument Dispenser about 12 years ago. I am licensed in Illinois, Iowa and Idaho. I went to work for two audiologists and took over their practice as they had moved on to other adventures. I manage two offices for my current employer. I do everything from being a patient care coordinator to doing complete hearing evaluations and fittings of prescription hearing aids. I see my clients on a regular basis, sometimes 3-4 times a year, in some cases monthly depending on the client's need. I provide free lifetime service to my clients because the work I do is very important. I consider hearing loss to be the "invisible disability." When a person has hearing loss and purchases hearing aids, the spouse or other family members will assume they are fixed. There is much more to it than that. A person has to re-train their brain to hear. It is not an instant fix. Family members need to take into consideration the special needs that person may have. They can't hear clearly through walls, or when you are leaning over the kitchen sink, they need to see your face and your facial expression and it may take some planning in a large group situation with a lot of background noise.

Recently, I had a medical doctor tell me, that his marriage has improved since his wife was prescribed hearing aids and purchased them. Imagine sitting with a family group and not being able to hear the conversation around you. You know everyone is talking and they're laughing and maybe they're laughing at you. At that point, why try...why spend time with people who are making fun of the fact that you can't hear. You feel stupid! It's depressing and you begin to think, maybe I am losing my mind. Maybe you are crazy. Maybe you have dementia. Maybe your husband will leave you. Maybe the volunteer work you do isn't important any longer because you can't hear when people talk to you. You have to ask them to repeat. You can't enjoy your favorite television show without everyone complaining that the TV is too loud. You feel more and more isolated and depressed and worthless.

That's what hearing loss can do.

Being a licensed hearing aid dispenser is more than selling a hearing device, which by the way, insurance companies shouldn't be trying to sell through the mail. That's another whole issue! I spend time with my clients getting to know their health history, their social situations and their every day frustrations because of hearing loss. Yes, good hearing aids can be expensive but very effective. What I consider "junk" hearing aids can actually do harm and be

a waste of money for someone whose budget may be tight.

I work closely with local audiologists and medical doctors. I know my limitations. I know when a person may have a serious health issue that needs to be addressed prior to purchasing hearing aids. Why would you even consider de-licensing hearing instrument dispensers?

I am BLESSED by the clients that I work with to help them hear. Please do not taking hearing loss and the role of audiologists and licensed hearing aid dispensers lightly. This is an honorable profession.

Respectfully,

[REDACTED]

Confidentiality Notice

This message is intended only for the individual or entity to whom it is addressed. If you are not the intended recipient, you are notified that any disclosure, distribution or copying of this communication is strictly prohibited. This communication may also contain protected health information (PHI). Failure to maintain PHI in a secure and confidential manner or unauthorized redistribution of PHI could subject you to penalties under state and federal law. If you have received and/or are viewing this message in error, please immediately notify the sender and delete or shred completely.

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Massage Board Consolidation
Date: Mon Sep 04 2023 11:09:38 CDT
Attachments:

I would like Iowa to keep the massage board separate and not consolidate with other boards. This way the massage board can address issues and concerns about the massage profession more quickly and professionally. Let's not consolidate.

I have been a massage therapist for nearly 20 years and believe that NOT consolidating would be the best decision.

[REDACTED]

From: [REDACTED]
To: Shipley Tom [LEGIS]
<tom.shipley@legis.iowa.gov>; devon.wood@legis.iowa.gov
<devon.wood@legis.iowa.gov>
Cc: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Bcc:
Subject: Athletic Trainers and Iowa Board and Commissions
Date: Mon Sep 04 2023 12:18:14 CDT
Attachments:

Good day and hope you are having a good holiday weekend!

Last Thursday I was made aware that the aware that our Iowa lobbyists attended the second meeting of the Boards and Commissions Review Committee. This Committee was tasked by the legislature in the large government reorganization bill enacted this year to review all of Iowa's Board and Commissions to determine if boards should continue as is, be reorganized, be combined with other boards, or be eliminated. Since its first meeting June 26th, the Committee's six subcommittees have reviewed all of Iowa's 259 boards and commissions. Larry Johnson is the Director of DIAL (Department of Inspections, Appeals, and Licensure) and recommended eliminating the Board of Athletic Training.

I don't know how Mr. Johnson thinks that a health care provider can be without licensure - it is completely illogical from a public safety and assurance stand point. It opens the door to any one to render care as an "athletic trainer" without proof or regulations or qualifications. In just the past 3 days I have had contact with probably over 500 youth athletes providing medical care; at a large softball tournament, at a youth football league and closest to my heart - the student-athletes at Lenox and Southwest Valley High School. I can't fathom someone untrained, putting themselves in an "athletic trainer" position. Fresh in our minds that received a lot of publicity are the care that athletic trainers gave to NFL football player Demar Hamlin or the care they gave LeBron James' son - life saving efforts. I guarantee every sporting event you watch on television has athletic trainers on the sideline or court. As we are amidst college sport season, you will probably see at least 2 athletic trainers go onto the field every time an athlete is injured.

Athletic trainers are required 6 years of education (6 years!!), hands on training, continuous education and a masters degree! Compared to many of our other Iowa organizations that require licensure that require way less than that, even 6-8 weekends of a virtual course.

Just some quick stats:

* We currently have 1,129 ATs who are licensed and countless students who rely on licensing. That licensure protects the public and lets clients and employers easily know an AT is properly trained, taking continuing education, and monitored.

*The Board helps provide scope of practice guidance and protects the public from untrained persons

*There is no expense associated with the Board of Athletic Training. The fees that ATs pay to renew their license cover all costs. They are cost-effective and are consistently in the black each year.

*Every state and Washington D.C require licensure for ATs, except for Hawaii (which requires registration) and California (who has pending legislation).

*Athletic trainers are healthcare professionals who specialize in the prevention, diagnosis and intervention of emergent, acute and chronic medical conditions involving impairment, functional limitations and disabilities.

*Athletic trainers provide medical services to all types of patients. Across the United States, in addition to practicing in traditional sports team settings, athletic trainers work in performing arts, public safety, occupational health, and with the armed forces.

*Licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.

*Eliminating licensure in IA could potentially impact an AT's ability to practice across state lines (travel with their team), depending on regulatory requirements in other states. (ex. some states allow you to practice in their state temporarily, provided your home state maintains the same regulatory requirements)

I know you both are pretty close to high schools in the area, so I invite you to come hang out with us - Shenandoah has one certified athletic trainer on staff, Clarinda HS has one AT, Bedford has an AT from Mosaic in Maryville and Creston has 4 ATs that provide care to local high schools and Southwestern Community College. I welcome you to speak to parents of athletes at the schools, coaches, athletic directors or school nurses - ask about how we provide quality care to their student-athletes.

This Wednesday, there is a public meeting, so that parties can address their concerns and recommendations then sent to the governor. I hope you take the time to research athletic trainers and their skills and expertise.

This got kind of lengthy, so I very much appreciate your time on this holiday weekend.

My cell is [REDACTED] if you have any questions about athletic trainers.

Thank you! [REDACTED]

[REDACTED]

Serving: SWV HS and Lenox HS

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Hearing Aid Specialist Licensure
Date: Mon Sep 04 2023 12:54:43 CDT
Attachments:

[REDACTED]

[REDACTED]

September 2, 2023
Iowa Boards and Review Committee
Re: Hearing Aid Specialist Licensure Elimination

Committee Members,

I am writing in regard to the proposed elimination of the Hearing Aid Licensure Board.

***** The FDA reclassified non-over the counter hearing aids as “Prescription Medical Devices”,

which can only be dispensed by prescription from a state licensed hearing aid practitioner.

* * ***** Elimination of the License will reduce the availability of hearing aids across the state, which will force lowans to seek hearing aids from unregulated providers.

· Elimination of the License will reduce the hearing aid service & repair centers across the state,

leaving hearing aids in disrepair.

What would happen if vehicle driving licenses were considered unnecessary.

- People that don't know how to drive or have unsafe vehicles would be driving.
- More accidents, more speeding, would occur.

Indeed, too much regulation can hinder the work force, the economy, and the state government.

However, Hearing Aid Licensure is not hindering. Rather it protects individuals in need and makes viable resources available to those people.

I encourage you to allow the Hearing Aid Specialist License to continue.

Feel free to contact me if you have questions.



From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Opposition to the Cancellation of the Iowa Athletic Training Board
Date: Mon Sep 04 2023 13:27:56 CDT
Attachments:

Dear Senator Quirmbach,

I am a current graduate student in the Master's of Science in Athletic Training at Iowa State. I am originally from Wisconsin and have travelled to the state of Iowa and Iowa State University for its excellence in the path of athletic training. I am writing to express my deep concern and opposition to the proposed cancellation of the Iowa Athletic Training Board. As a spectator of athletics and a graduate student at Iowa State University, I firmly believe that athletic trainers play a vital role in the protection and rehabilitation of athletes, particularly in high schools, and their absence would be detrimental to the state of Iowa.

Athletic trainers are a crucial part of the healthcare team for athletes of all levels, not limited to just varsity football games as some may believe. They are present at all sporting events, ensuring the well-being of student-athletes and addressing their medical needs promptly. Their expertise goes beyond the sidelines; they are dedicated professionals who specialize in the prevention, diagnosis, and intervention of emergent, acute, and chronic medical conditions affecting athletes' performance and overall health.

It is worth noting that every state in the nation, with the exception of California, has recognized the importance of athletic trainers by implementing licensure requirements. This recognition ensures that only qualified individuals can practice as athletic trainers, upholding the highest standards of care and professionalism. Without the Iowa Athletic Training Board, our state would be an outlier, potentially discouraging qualified athletic trainers from coming to work here. This absence of regulation could allow unqualified individuals to claim the title of athletic trainer, posing a significant risk to the safety of our athletes.

Moreover, the cancellation of the Iowa Athletic Training Board would tarnish the reputation of our state and the institutions within it. As a graduate student at Iowa State University, I have witnessed the dedication and hard work put in by my cohort and those who came before and after us. Eliminating the board would diminish the pride we take in attending and eventually

graduating from an institution in Iowa that values and supports the athletic training profession.

In recent years, professional sports and college athletics have brought the athletic training profession into the spotlight. Athletic trainers have been recognized for their lifesaving efforts in critical situations, such as Damar Hamlin's cardiac arrest during a football game. The Buffalo Bills Athletic Training staff's swift and skilled response undoubtedly saved his life. While such cases may be considered extreme, they exemplify the level of care and commitment that athletic trainers bring to their profession. As a society, we should not settle for anything less when it comes to the well-being of our athletes.

In conclusion, I urge you to vote against the cancellation of the Iowa Athletic Training Board. Athletic trainers are essential healthcare professionals who safeguard the health and safety of our student-athletes. Their licensure ensures the highest standards of care and professionalism. We should not jeopardize the health and well-being of our athletes or tarnish the reputation of our state by eliminating this crucial regulatory body.

Thank you for your time and attention to this matter. I hope you will take my concerns into consideration when discussing this issue. Please feel free to contact me if you would like to further discuss this important topic.

Kind Regards,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Concern
Date: Mon Sep 04 2023 14:47:38 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

--
[REDACTED]
[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Iowa AT Support
Date: Mon Sep 04 2023 15:10:06 CDT
Attachments:

To Whom it may concern,

As a fellow Athletic Trainer and an Illinois Athletic Training Association Board Member, in the neighboring state of Illinois I felt it was imperative that I reach out in solidarity with my Iowan Athletic Training colleagues.

The profession of Athletic Training has taken the world stage over the past several months with numerous high profile, televised injuries. Between the devastating Damar Hamlin injury and the subsequent recognition of the entire Buffalo Bills Athletic Training Staff with the Pat Tillman Award for service at the ESPYS, it is becoming abundantly clear that the profession of Athletic Training is a vital piece in the healthcare continuum of care for athletes.

The integrity of our healthcare profession is based upon rigorous coursework, advanced degree requirements and hundreds of hours of clinical training in order to become eligible for Board testing at a National level. Athletic Training is healthcare and we ATs are responsible for the health and wellbeing of a specific population. We have national regulation via this national board exam to initially become credentialed to practice but, as you know in many other areas for professional organizations, it is the States that are ultimately responsible for the adherence to and maintenance of educational competency via Licensure and Board regulation. We must have a standard of practice and system of vetting applicants or current licensees, or we will be headed to the unregulated randomness as seen in, and only in, the State of California which does not regulate Athletic Training at the State level.

Reducing or eliminating regulation will lead to the reversion of Athletic Training practice in your state to the previous climate of Athletic Training where literally anyone could serve as the "Athletic Trainer" at their place of employment as that employer saw fit.

The Iowa Athletic Training Society, represents over 1000 Athletic Trainers in your state, I cannot stress the importance of maintaining their regulating bodies in order to insure the protection of the Athletes in your State. I fully understand the streamlining and reduction of governmental burden in some areas and that the task of the Boards and Commissions Review is great but reduction for a profession that provides healthcare to the athletes in the state (in many instances the youth) CANNOT be part of this. Additionally, this proposed reduction will not affect cost-saving measures as the Board of Athletic Training operates without funding from the State as the members are volunteers and they do meet virtually.

I beg for your support of the athletic training constituents of your state to maintain your Licensure and Board as is, without modification.

Thank you for your time and consideration and please do not hesitate to reach out if you have any questions.

Sincerely,

[Redacted signature block]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Board of Athletic Training - Letter of Support
Date: Mon Sep 04 2023 15:21:51 CDT
Attachments:

Hello,

I'm [REDACTED], a Certified Athletic Trainer and a resident of Des Moines. I'm writing this letter to state my full support for KEEPING the State of Iowa Board of Athletic Training (Board). The Board was formerly part of the Bureau of Professional Licensing and is now part of the Iowa Department of Inspections, Appeals, and Licensing (DIAL) as a result of the Government Restructuring Plan. In late August 2023, the Boards and Commissions Review Committee and the Director of DIAL proposed eliminating the Board of Athletic Training, and thus licensure regulation of the Athletic Training profession in Iowa. Disbanding the Board of Athletic Trainers and eliminating the regulation of Athletic Trainers in our State would have detrimental effects on healthcare accessibility to athletes and physically active Iowans in addition to employed Athletic Trainers, Athletes, Parents, Sports Medicine Physicians, Schools/Universities, major industrial organizations, and physically active persons who all rely on the invaluable healthcare services that Athletic Trainers provide daily.

There are approximately 1,100 Athletic Trainers licensed by the Board at the current time. The profession of Athletic Training is regulated in 49 states and Washington D.C. while California currently has pending legislation to enact regulation. In recent years, several states have advanced their level of Athletic Training regulation to the highest form of regulation, licensure.

Licensure of a healthcare profession such as Athletic Training is vital to providing protection to the public and ensuring high standards of education, competence, and professionalism that the public can trust in its healthcare professionals. The Board is responsible for several things including determining and enforcing the Athletic Training Practice Act (Iowa statute regulating how Athletic Trainers can practice) and the administrative rules and regulations that govern how the Board is run. Additionally, the Board is responsible for screening and administering all new licensee applications and enforcing the standards set for licensure renewal including ongoing professional development. The Board also processes enforcement and disciplinary cases against licensees who violate the state's Practice Act and Board rules and regulations. Furthermore, state regulation protects all college students in Athletic Training education programs, who rely on credentialed practitioners to provide them with a clinical learning experience. The fundamental responsibility of the Board and state regulation is to prevent untrained or uneducated people from practicing as or portraying an Athletic Trainer.

By eliminating the Board and disbanding the state regulation of Athletic Trainers, it would have a profound effect on how Athletic Trainers practice and who could falsely portray themselves as Athletic Trainers. One detrimental effect of losing state regulation is that Athletic Trainers

who currently cross state lines with traveling athletic teams would be hampered in their ability to provide medical care to their own patients in nearby states, as those state regulations recognize that an Athletic Trainer is already credentialed by their home state and grants them the ability to practice temporarily given this stipulation. Currently, the Board is funded by fees that licensee's or licensee applicants pay, and the Board has always been able to sustain itself financially off these fees without a financial deficit.

Athletic Trainers are healthcare providers who specialize in preventing, diagnosing, and providing therapeutic interventions for musculoskeletal injuries in addition to managing emergent, acute, and chronic medical conditions that cause impairment, functional limitations, and disabilities. Athletic Trainers are required to be credentialed nationally by the Board of Certification upon passing their entry-level certification exam after graduating with a master's degree in athletic training (recently transitioned from a bachelor's degree) from an accredited educational program. Athletic Trainers have been recognized by the American Medical Association and the US Department of Health and Human Services as allied healthcare providers.

Traditionally, Athletic Trainers practiced in high school, university/college, and professional athletic programs treating athletes, however in recent years have expanded their practice settings to include larger industrial entities, performing arts, youth sports, public safety agencies, military, orthopedic physician clinics, or by operating independent small businesses. In many instances, Athletic Trainers are the frontline and foremost healthcare providers an athlete or physically active individual may have access to for managing their healthcare needs.

In conclusion, I strongly encourage you to consider maintaining the Board of Athletic Training and protecting the licensure regulation of Athletic Trainers in the State of Iowa. Disbanding the Board and state regulation would be a huge negative step for the patients that Athletic Trainers serve daily and the Athletic Training profession at large. While the number of Athletic Trainers licensed is smaller compared to other healthcare professions, they serve a much larger population and may be the only healthcare resource readily accessible to many athletes at high schools or colleges or occupational workers. Protecting the public and setting the standard of care is paramount for the vitality of Athletic Training in the State of Iowa.

Sincerely,



From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Iowa Chiropractic Licensure
Date: Mon Sep 04 2023 15:59:00 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: NECA
Date: Mon Sep 04 2023 18:09:42 CDT
Attachments:

I would like to speak about the merging of the electrical examining board on behave of NECA.

[REDACTED]

DO YOU KNOW...

Baker Group's electrical team ensures commercial, industrial or institutional projects have ample, dependable power when and where needed.

Please consider the environment before printing this email

This message and its attachments contains confidential information and is intended only for the highly valued individual customer or team member named. Please notify the Baker Group sender immediately by e-mail or telephone if you have received this e-mail by mistake and delete this e-mail from your system. Please do not distribute or copy this e-mail. Because e-mail transmission cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses, Baker Group cannot accept liability for the contents of this message. If verification is required please request a hard-copy version. Thank you for the opportunity to work with you!

From: [REDACTED]
To: BCRCcomments@iowa.gov
<brcrccomments@iowa.gov>
Cc:
Bcc:
Subject: IHS
Date: Mon Sep 04 2023 19:12:01 CDT
Attachments:

Dear Boards and Commissions Review Committee members,
I write to you today, as a licensed hearing aid specialists who provides hearing healthcare services to an increasingly growing population, to express my concern with the Boards and Hello,

Commissions Review Committee Subcommittee's August 29, 2023, recommendation to eliminate the Board of Hearing Aid Specialists (herein referred to as "the Board").

The elimination of this Board will result in the unintended consequence of:

Limiting/ lowering hearing healthcare access;

Loss of licensure;

Eliminating consumer protection;

Compromised patient safety;

Individual complacency;

Reducing competition; and

Laxed hearing healthcare industry standards.

This is because this Board – consisting of hearing healthcare industry experts- evaluates an individual's application for licensure and issues a license if the individual meets statutory, regulatory, and board requirements. Additionally, the Board promulgates regulations to ensure consumer protections from fraud and abuse and educational standards that aligned with current

practices to best serve Iowa's hearing-impaired citizens. Furthermore, this Board investigates complaints about unprofessional conduct.

Eliminating this Board may be interpreted by the U.S. Food and Drug Administration (FDA) as eliminating the ability of licensed hearing aid specialists to order the use of prescription hearing aids. Late 2022, the FDA issued regulations recategorized "traditional hearing aids," which have

been dispensed by licensed hearing aid specialists for decades, as "prescription medical devices,"

which must be "prescribed or ordered the use of" by a licensed hearing care professional; 21 C.F.R. § 801.109. Prescription hearing aids require a written or oral authorization from a practitioner licensed by law to administer the device (C.F.R. §801.109).

It is for these reasons that it is paramount that Iowa maintains the Board of Hearing Aid Specialists.

Thank you for your attention to my concerns with eliminating the Board of Hearing Aid

Specialists and I respectfully ask for your consideration. Please feel free to contact me if you would like to discuss this issue further.

--

A large black rectangular redaction box covering the signature and name of the sender.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Please keep Athletic Trainer Licensure
Date: Mon Sep 04 2023 20:02:27 CDT
Attachments:

Athletic Trainers provide an important service and are valued members of the health care team. It is important that our state maintains them as a licensed provider. Without proper oversight the student athletes of Iowa will be at risk for having unlicensed providers without the same qualifications making important decisions regarding their health, safety & injury status. Please maintain licensure of athletic trainers in our state to protect our student athletes.



Sent from my iPhone

From: [REDACTED]
[REDACTED]
[REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Elimination of Iowa's Necessary Licensed and Trained Hearing Aid Dispensers
Date: Tue Sep 05 2023 06:57:47 CDT
Attachments: Outlook-1652385395.png

I am writing with a heavy heart as today we found out that our profession and what is in the best interests of patients who are hard of hearing, are once again under attack. It was proposed by the Boards and Commissions Review Committee to eliminate the Board of Hearing Aid Specialists. This suggestion was also proposed in 2017 and 2020 where we fought hard to prove our value and prove that it is undoubtedly in the best interests of Iowans to not attack our license and it was understood that removing this board would have unintended consequences. This has happened in other states where after only a few short years the board had to be reinstated due to unregulated hearing aid dealers selling hearing aids to people just to disappear and never to be seen again. These hearing aids were often improperly fit and diagnosed and people who merely had wax in their ear canals were conned out of thousands. The standard of care that we provide to patients is valuable to Iowans. Hearing aids are not something one can simply pick up and go. It requires ongoing care and commitment to taking care of the patients who trust in us.

Our responsibilities include not only the certified treatment of hearing loss (including ongoing training requiring CEUs) but also providing a comprehensive otoscopic and hearing evaluation which sometimes can be lifesaving as a hearing evaluation can indicate dangerous medical conditions such as a tumor of the auditory nerve. We are also supporting our Audiologists with the growing number of patients and without us it will not be possible for the current number of Audiologists in our state to support the workload of patients as we already have a shortage of providers in our field. Remember, if you de-license us we will no longer be able to be credentialed to work with insurance, which is another disservice to patients if this decision is made. Many Iowans who has built careers caring for patients will have their livelihood be eliminated.

The care for these patients will quickly decline and without the proper care, proper evaluation, and proper treatment of hearing loss it will, as studies shown by John Hopkins and the Lancet Commission, contribute to cognitive decline and lead to an increase in cases of conditions like dementia and Alzheimer's. We play an important role in ensuring no one is left behind and these wonderful people are cared for in the manner that they deserve.

The studies done by notable associations like John Hopkins, Harvard Medical School, and the Lancet Commission have proven our value and need. So, I ask you, once again, to please reconsider this proposal. This will be very harmful to the incredible Iowans who need us.

[REDACTED]

This link below is the proposal where we are mentioned at number 26
https://governor.iowa.gov/media/228/download?inline=&utm_medium=email&utm_source=govdelivery

>From the Lancet Commission

<https://www.thelancet.com/infographics-do/dementia-risk>

>From John Hopkins University

<https://hub.jhu.edu/2023/01/11/hearing-loss-linked-with-dementia/#:~:text=The%20analysis%20covered%202%2C413%20individuals,participants%20who%20had%20normal%20hearing.>

Johns Hopkins study links hearing loss with dementia in older adults
Bloomberg School study finds older adults with greater severity of hearing loss were more likely to have dementia, but the likelihood of dementia was lower among hearing aid users compared to non-users
hub.jhu.edu

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Owner:

[REDACTED]

Filename: Outlook-1652385395.png

Last Modified: Tue Sep 05 06:57:47 CDT 2023



WORLDWIDE

AUDIOLOGY

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Hearing aid licensing
Date: Tue Sep 05 2023 07:49:47 CDT
Attachments:

Dear Boards and Commissions Review Committee members,

I write to you today, as a licensed hearing aid specialist who provides hearing healthcare services to an increasingly growing population, to express my concern with the Boards and Commissions Review Committee Subcommittee's August 29, 2023, recommendation to eliminate the Board of Hearing Aid Specialists (herein referred to as "the Board").

The elimination of this Board will result in the unintended consequence of:

- Limiting/ lowering hearing healthcare access;
- Loss of licensure;
- Eliminating consumer protection;
- Compromised patient safety;
- Individual complacency;
- Reducing competition; and
- Laxed hearing healthcare industry standards.

This is because this Board – consisting of hearing healthcare industry experts- evaluates an individual's application for licensure and issues a license if the individual meets statutory, regulatory, and board requirements. Additionally, the Board promulgates regulations to ensure consumer protections from fraud and abuse and educational standards that aligned with current practices to best serve Iowa's hearing-impaired citizens. Furthermore, this Board investigates complaints about unprofessional conduct.

Eliminating this Board may be interpreted by the U.S. Food and Drug Administration (FDA) as eliminating the ability of licensed hearing aid specialists to order the use of prescription hearing aids. Late 2022, the FDA issued regulations recategorized "traditional hearing aids," which have been dispensed by licensed hearing aid specialists for decades, as "prescription medical devices," which must be "prescribed or ordered the use of" by a licensed hearing care professional; 21 C.F.R. § 801.109. Prescription hearing aids require a written or oral authorization from a practitioner licensed by law to administer the device (C.F.R. § 801.109).

It is for these reasons that it is paramount that Iowa maintains the Board of Hearing Aid Specialists.

Thank you for your attention to my concerns with eliminating the Board of Hearing Aid Specialists and I respectfully ask for your consideration. Please feel free to contact me if you would like to discuss this issue further.

Sincerely,

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Sent from Yahoo Mail for iPhone

From:

[Redacted]

To: BCRCComments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Bcc:

Subject: Boards and Commissions Review Mtg

Date: Tue Sep 05 2023 07:55:45 CDT

Attachments: image001.jpg

To whom it may concern:

I am presently a board member of the elevator safety committee. I feel that eliminating this board will put a strain on the current staff and inspections department to operate fairly and investigate past practices. We have viewed the public, the ownership of buildings, and the industry when it comes to safety and code adoption. To put this into a very small group of one-sided group will be detrimental to all of those involved. I would like to address the committee if there is sufficient time allocated.

Regards,

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Owner:

[REDACTED]

Filename: image001.jpg

Last Modified: Tue Sep 05 07:55:45 CDT 2023

image001.jpg for Printed Item: 404 (Attachment 1 of 1)



ELEVATORS | COMPONENTS | MODERNIZATION | SERVICE

Page 667 of 1221

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: AT license
Date: Tue Sep 05 2023 08:34:13 CDT
Attachments:

To whom it may concern:

I am very concerned about the proposal to eliminate state oversight of Athletic training healthcare professionals.;

Athletic trainers as clinicians and the Masters training program in Athletic training are critically important to the Department of Orthopedics and Rehabilitation. As clinicians they support our faculty in care delivery and provide primary care to injured athletes on the field, sideline and in the training room. They are important members of our musculoskeletal healthcare system. Educationally our three Athletic training faculty run an outstanding Master's Program that produces highly skilled graduates on a yearly basis. They are integral members of our faculty and their program fits well with the other educational programs in our department and in the College of Medicine.

Eliminating the board and licensing for Athletic training would be a step backward in healthcare regulation, allow athletic training to become a free for all in our state, increase the cost of care of injured athletes and decrease or eliminate our ability to work with these skilled providers. I believe it is very hard to predict all the negative effects of this proposed action. Our healthcare system depends on strong state boards to assure that all providers provide a safe and effective level of care and this regulation must continue to include Athletic Training.

Hopefully the proposed elimination of this board and licensure will be reconsidered and the idea will be discarded. I appreciate your thoughtful deliberation on this critically important issue.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Hearing Instrument Specialist deregulation
Date: Tue Sep 05 2023 08:38:45 CDT
Attachments:

There are countless reasons why the de regulation of our profession is a terrible idea. We fit prescriptive medical devices that require extensive training and licensing to be able to fit patients properly and effectively. In the course of our work, we are trained to discover underlying medical conditions that can be medically serious that require the intervention of a doctor or ENT. These conditions can be something as simple as impacted earwax, or something more significant like brain tumors. Untrained and unlicensed individuals have no ability to recognize these serious, underlying medical conditions, and these patients would go untreated, and could have a very significant impact on their health.

Last October the FDA approved over the counter hearing aids. They develop two classifications of hearing aids. Over-the-counter hearing aids require no hearing test no evaluation and are not seen by a licensed professional. The other class of hearing aids are referred to as prescription hearing aids. Prescription, hearing aids are required to be fit a licensed professional. This would eliminate the entire category of prescription hearing aids with deregulation. Prior to the launch of over-the-counter hearing aids there were many surveys done throughout the industry to evaluate the public's perception of the need of a license professional to fit and treat the hearing loss properly. In countless studies up to 96% of individuals acknowledged the importance of the interaction with a licensed hearing care professional to properly treat their hearing loss.

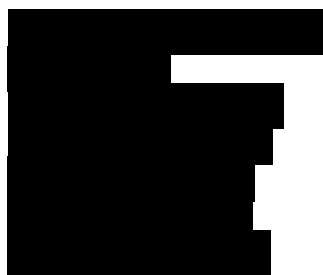
Since the launch of over-the-counter hearing aids, our business is actually up by over 20%. Over-the-counter hearing aids have had no impact whatsoever on the hearing aid industry. I believe this solidifies the understanding and the need for licensed trained professionals to treat the patients properly and effectively.

Deregulation of licensing for hearing instrument specialist would open the door for anyone to fit the unknowing and vulnerable, predominantly, senior population. The outcomes of these fittings would be very poor and the consequences to the patients would be astronomical. If a person tries hearing aids and is unsuccessful with them statistically they wait 5 to 7 years to try hearing aids again. In the course of that time the hearing loss can become so great that hearing aids even at a premium level are ineffective. Recent studies have shown that untreated hearing loss has a significantly higher chance of developing Alzheimer's and dementia. There are higher risks of falling, social isolation, and depression for those with untreated, hearing loss.

The International Hearing Society administers the license exam for hearing instrument specialist in 40 states. There is significant training and learning involved to be able to pass the

international license exam. The exam is designed to prove total competency to be able to safely and effectively work in our profession. Even with this extensive training the first time pass rate of the exam is only 60%. So even properly trained individuals require a great deal of time to be able prove competency. What would an individual with no training whatsoever be able to do for an unsuspecting person in need of proper hearing healthcare?

There are many other reasons why eliminating the hearing instrument specialist board is a very poor idea for the interest of thousands of lowans. Please take this into consideration thank you.



From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Letter
Date: Tue Sep 05 2023 08:47:14 CDT
Attachments: Letter Against Eliminating Iowa Board of Hearing Aid Specialists_0001.pdf

Please find my letter attached for comments in regards to Iowa maintaining the Board of Hearing Aid Specialists.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Owner:

Filename:

Letter Against Eliminating Iowa Board of Hearing Aid Specialists_0001.pdf

Last Modified:

Tue Sep 05 08:47:14 CDT 2023



ALGONA HEARING CENTER, LLC

Dear Boards and Commissions Review Committee members,

I write to you today, as a licensed hearing aid specialist who provides hearing healthcare services to an increasingly growing population, to express my concern with the Boards and Commissions Review Committee Subcommittee's August 29, 2023, recommendation to eliminate the Board of Hearing Aid Specialists (herein referred to as "the Board").

The elimination of this Board will result in the unintended consequence of:

- Limiting/ lowering hearing healthcare access;
- Loss of licensure;
- Eliminating consumer protection;
- Compromised patient safety;
- Individual complacency;
- Reducing competition; and
- Laxed hearing healthcare industry standards.

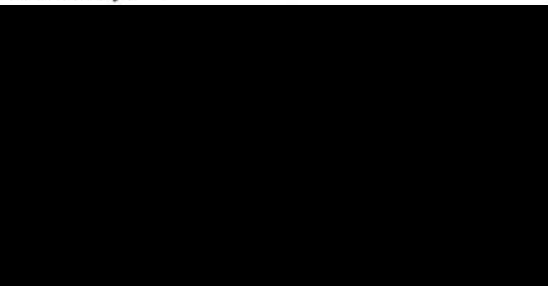
This is because this Board – consisting of hearing healthcare industry experts- evaluates an individual's application for licensure and issues a license if the individual meets statutory, regulatory, and board requirements. Additionally, the Board promulgates regulations to ensure consumer protections from fraud and abuse and educational standards that aligned with current practices to best serve Iowa's hearing-impaired citizens. Furthermore, this Board investigates complaints about unprofessional conduct.

Eliminating this Board may be interpreted by the U.S. Food and Drug Administration (FDA) as eliminating the ability of licensed hearing aid specialists to order the use of prescription hearing aids. Late 2022, the FDA issued [regulations](#) recategorized "traditional hearing aids," which have been dispensed by licensed hearing aid specialists for decades, as "prescription medical devices," which must be "prescribed or ordered the use of" by a licensed hearing care professional; 21 C.F.R. § 801.109. Prescription hearing aids require a written or oral authorization from a practitioner licensed by law to administer the device (C.F.R. § 801.109).

It is for these reasons that it is paramount that Iowa maintains the Board of Hearing Aid Specialists.

Thank you for your attention to my concerns with eliminating the Board of Hearing Aid Specialists and I respectfully ask for your consideration. Please feel free to contact me if you would like to discuss this issue further.

Sincerely,



From: [REDACTED]
[REDACTED]
To: BCRCComments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Deregulation Rebutal
Date: Tue Sep 05 2023 08:49:26 CDT
Attachments: Outlook-xfe5p4tc.png

Hello,

I am writing to let you know that I strongly recommend not to change the licensure requirements for hearing aid specialists in Iowa. I am an employee of Miracle Ear. We must have professionals that are licensed in the State to dispense hearing aids. They need to be trained and know what to look for in case of health factors with the ears and brain, like ear wax, tumors, and infections. If we don't, it affects person's ability to communicate with other people and their overall health. If we do not have licensed hearing care professionals, there will not be adequate programming of hearing aids, counselling how to clean, operate, and maintain their hearing aids, and just the overall effectiveness of the hearing aids.

Would you want to go to someone or have your grandmother go to someone that hasn't had adequate training and not licensed in the state to help you or her with hearing aids?

Thank you for your time and consideration of this matter.

Have a great day,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Owner:

[REDACTED]

Filename: Outlook-xfe5p4tc.png

Last Modified: Tue Sep 05 08:49:26 CDT 2023

Outlook-xfe5p4tc.png for

Printed Item: 410 (

Attachment 1 of 1)

Page 678 of 1221

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: I would like to Speak against the State Board Realignment
Date: Tue Sep 05 2023 08:50:20 CDT
Attachments:

To Whom it may Concern,

I am reaching out to let lowans know the intent and purpose of the Iowa Electrical Board.

I was part of developing this legislation and served on the Electrical Board as well.

It needs its structure in order to serve the Electrical industry here in Iowa.

Please let me know if you have a time slot I may come and speak!

Thank you!

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Iowa Chiropractic Licensure Board
Date: Tue Sep 05 2023 08:50:22 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board and the knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

The information contained in this transmission may contain privileged and confidential information, including patient information protected by federal and state privacy laws. It is intended only for the use of the person(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution, or duplication of this communication is strictly prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Board of AT elimination
Date: Tue Sep 05 2023 08:52:55 CDT
Attachments:

It appears to be careless and dangerous to eliminate the Board of Athletic Training without a new process in place to govern the licensure and accreditation of programs in which athletic trainers practice and train.

Athletic trainers provide medical care and therefore they should be regulated and monitored in some way. Simple elimination of the Board of Athletic Training places all who receive care by these practitioners (many of whom are minors) at risk of negligent or inept care. At minimum, this entity should be maintained until there is a new process or entity in place to serve a purpose of licensing/accreditation. Many other related boards (healthcare or healthcare adjacent) selected for changes under the proposal are indicated for changes and merging. It is baffling why the Athletic Training Board is not among that group.

I urge the committee to put a plan in place to protect all of us served by Athletic Trainers prior to simple elimination of the Board.

Sincerely,

[REDACTED]

From: [REDACTED]
[REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic Trainer Examiners Board
Date: Tue Sep 05 2023 09:01:42 CDT
Attachments:

I am writing this public comment as a retired athletic trainer who dedicated 45 years of my career to providing health care services to athletes and physically active individuals in Iowa at The University of Iowa. I am writing to urge support for the continuation of the Iowa Board of Athletic Training Examiners, which gave me a voice in public discourse with patients, school administrators, coaches, and other medical and health care providers. Without a license I would not have had the backing available to me to show that I was anything other than a voice advocating for active patients in an often unsympathetic coach and parental-glory-driven occupation.

My colleagues and by association now their athletic patients may be left high and dry with travel obligations with teams. Most every state has some form of regulation so that out-of-state travel imposes a risk of malpractice for my colleagues. This is just another complication for athletic trainers who do not have a license.

As a retired athletic trainer, I am proud of my profession and grateful for the board's support throughout my career. I have witnessed firsthand how athletic trainers make a positive difference in the lives of their patients, their communities, and their profession. I have also seen how the board has helped to protect and enhance the practice of athletic training in Iowa. I strongly believe that eliminating or weakening the board would be detrimental to the public health and safety, as well as to the athletic training profession in our state.

Therefore, I respectfully support for the continuation of the Iowa Board of Athletic Training Examiners and oppose any attempts to abolish or reduce its authority or functions. By doing so, Iowa will be supporting quality and safety of health care delivery, as well as the rights and interests of athletic trainers and their patients.

Thank you for your time and attention. Please feel free to contact me if you have any questions or concerns.

Sincerely,

[Redacted signature line]

[Redacted name]

Sent from Mail for Windows

From:

[Redacted]

To:

BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

[Redacted]

Bcc:

Subject:

Letter of Opposition

Date:

Tue Sep 05 2023 09:07:10 CDT

Attachments:

Letter for IA.pdf
Outlook-adcng2t2.png

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

“Great things in business are never done by one person. They’re done by a team...” -Steve Jobs

From:

[Redacted]

[REDACTED]

Subject: Re: Emails

Sorry, not you... [REDACTED] the PCC in Muscatine.

Thank you,

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

From: [Redacted]

Sent: Tuesday, September 5, 2023 7:09 AM

To: [Redacted]

[Redacted]

[Redacted]

Subject: Re: Emails

Mines done.

Get Outlook for iOS

From: [Redacted]
Sent: Tuesday, September 5, 2023 7:04:13 AM
To: [Redacted]

[Redacted]

[REDACTED]

Subject: Fwd: Emails

See below list

Team, I wanted these done Friday. I meet with the State Committee at noon tomorrow. Take 5 minutes and get this done by noon today. This is extremely important!!
Email holly and I when done

Send to: BCRCcomments@iowa.gov

[REDACTED]

President-Iowa Hearing Association

“ Dream Big, Make Plans, & Smash Goals”

Begin forwarded message:

From: [REDACTED]
Date: September 5, 2023 at 6:55:52 AM CDT
To: [REDACTED]
Subject: Re: Emails

[REDACTED]

I sent mine last week also.

Thank you,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]

Sent: Tuesday, September 5, 2023 6:42 AM

To: [REDACTED]

Subject: Emails

Please send me who hasn't sent their emails to the state

[REDACTED]

President-Iowa Hearing Association

" Dream Big, Make Plans, & Smash Goals"

Owner:

[REDACTED]

Filename:

Letter for IA.pdf

Last Modified:

Tue Sep 05 09:07:10 CDT 2023

To Whom it may concern:

I don't agree with the decision to sell hearing aids without a license in the state of Iowa. I work as a Patient Care Coordinator in the state of Minnesota but see patients who reside in Iowa often. Their health and safety matters to me, and by bypassing the need for licensed hearing aid consultants we bypass potential diagnoses for life threatening ailments like tumors and other neurological issues. The education obtained by licensed hearing specialists is critical to the health of the people of Iowa.

[REDACTED]

Patient Care Coordinator

Owner:

[REDACTED]

Filename: Outlook-adcng2t2.png

Last Modified: Tue Sep 05 09:07:10 CDT 2023

Outlook-adcng2t2.png for Printed Item: 416 (Attachment 2 of 2)

Page 696 of 1221

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Speak at recommendation mtg
Date: Tue Sep 05 2023 09:18:06 CDT
Attachments:

Hi- I'd like to speak about the proposed elimination of the Midwifery Advisory Committee.

Thanks,

[REDACTED]

Sent from my iPhone

From: [REDACTED]
[REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Hearing Instrument Specialist deregulation
Date: Tue Sep 05 2023 09:20:54 CDT
Attachments:

To whom it may concern,
I am writing to express my deep concern about the potential changes to licensure requirements for hearing aid specialists in Iowa. As a hearing care professional, and resident of this great state, I believe that it is crucial to maintain stringent licensure standards for professionals in the field of hearing health, hearing aid dispensing, and hearing aid programming.

Hearing health is a fundamental component of overall well-being. Hearing impairment can significantly impact an individual's quality of life, affecting their ability to communicate, work, and engage in social activities. Hearing aids are essential tools that enable people with hearing loss to regain their independence and actively participate in society. However, the effectiveness of these devices depends largely on the expertise of hearing aid specialists.

By maintaining licensure requirements for hearing aid specialists, we ensure that those entrusted with the care of individuals with hearing loss are highly trained and qualified. These specialists possess the knowledge and skills necessary to perform comprehensive assessments, recommend appropriate hearing aids, and provide personalized programming to meet the unique needs of each patient. Without these standards in place, there is a risk of inadequate care and improper device programming, which can lead to suboptimal outcomes for patients. Moreover, hearing aid specialists play a vital role in the prevention and management of ear health issues. They can identify conditions that may require medical attention and refer patients to the appropriate healthcare professionals. This early intervention is crucial in addressing potentially serious ear-related health concerns.

Maintaining licensure standards for hearing aid specialists is not only about ensuring the highest level of patient care but also about upholding the integrity of the profession. It demonstrates a commitment to the well-being of Iowa's residents and the preservation of their hearing health.

I urge you to consider the long-term implications of any changes to the licensure requirements for hearing aid specialists. Please prioritize the health and well-being of Iowa's residents by maintaining these standards to guarantee that individuals with hearing loss receive the best possible care and support.

Thank you for your time and consideration. I look forward to your continued support in safeguarding the hearing health of our community.

Sincerely,

A solid black rectangular box used to redact a signature.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: AT Licensure
Date: Tue Sep 05 2023 09:25:34 CDT
Attachments: image003.jpg

I am writing you today to express my concerns about a a push to eliminate the Board of Licensure for Athletic Training. I have been licensed in the state of Iowa since 1995 and am still currently practicing. Elimination of the licensing of Athletic Trainers would put every athlete in the State at risk. The highly publicized event in the NFL and Demar Hamlin shows the value of the Athletic Trainer. Just think if that was an away game for an athlete that was in another state and without Iowa licensure that athlete's Athletic Trainer couldn't provide care due to lack of licensing. Or they were being cared for by unqualified individuals.

Here are some facts about Athletic Training.

***** There are over 1,100 licensed athletic trainers in the state of Iowa.

***** The renewal fees that ATs pay fully funds the AT Board and is not a cost to the state.

***** The AT license protects the health, safety, and welfare of the public by ensuring that the ATs in the state are the qualified healthcare providers that athletes in Iowa deserve.

***** The AT Board evaluates our scope of practice and adapts that based on the rapidly changing world of healthcare. If the Board is eliminated, other healthcare providers will have influence over our scope of practice.

***** Other states, like South Carolina moved towards licensure. Thus 49/50 states have regulation. This action would make Iowa, like California, not requiring licensure for ATs.

***** The elimination of AT licensure may reduce the willingness of graduating students to stay in the state. It may also lead to currently licensed ATs leaving the state. We are already experiencing difficulty hiring ATs across the state, this would just increase the struggle, specifically in rural schools.

***** ATs appear in the Iowa Code as licensed healthcare providers, specifically in the recent concussion law that was signed, declaring ATs as licensed healthcare providers

Thank you for your time and I hope Iowa will push to keep licensing of Athletic Trainers.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Owner:

[REDACTED]

Filename: image003.jpg

Last Modified: Tue Sep 05 09:25:34 CDT 2023



Official provider for
athletic training and
physical therapy services
to the Grand View Vikings.

From:

[REDACTED]

To:

BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Bcc:

Subject: Hearing Instrument Specialist deregulation

Date: Tue Sep 05 2023 09:26:24 CDT

Attachments:

To whom it may concern:

I am writing in opposition to the deregulation of Licensing for Hearing Instrument Specialists in Iowa. I am a hearing instrument specialist and have been licensed in the State of Iowa for over 6 years. There are many reasons why the deregulation of my profession is a bad idea. We fit prescriptive medical devices that require extensive training and licensing to be able to fit patients properly and effectively. We are trained to discover underlying medical conditions that can be medically serious that require the intervention of a doctor or ENT. These conditions can be as simple as impacted earwax or something more significant like a brain tumor. Untrained and unlicensed individuals have no ability to recognize these serious, underlying medical conditions and these patients would go untreated, which could have a significant impact on their health.

Deregulation of licensing for hearing instrument specialists would open the door for anyone to fit the unknowing and vulnerable, predominantly senior population. The outcomes of these fittings would be very poor and the consequences to the patients would be astronomical. If a person tries hearing aids and is unsuccessful with them - statistically they wait 5-7 years before trying hearing aids again. In the course of that time the hearing loss can become so great that hearing aids, even at a premium level are ineffective. Recent studies have shown that untreated hearing loss has a significantly higher chance of developing Alzheimers and dementia. There are a higher risk of falling, social isolation and depression for those with untreated hearing loss.

There are many other reasons why elimination the hearing instrument specialist board is a very bad idea. It is hard for me to believe that this issue keeps happening. Please take this into consideration and do not deregulate the hearing instrument specialists. Thank you!

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic Training Board
Date: Tue Sep 05 2023 09:26:53 CDT
Attachments:

To Whom it May Concern,

It has come to my attention that The recently formed Boards and Commissions Review Committee (BCRC) intends to eliminate over 140 advisory boards, including the Board of Athletic Training.

As an athletic trainer for the past 30+ years, I feel that this would be a bad thing for the people of Iowa. As athletic trainers, we provide care to a vast majority of the athletes in the state, from the college level all the way down to "little league" football players. We are often the first person on the scene when there is an injury on the field. Athletic trainers are highly trained health care professionals.

De-regulating athletic training will greatly compromise the healthcare of many people in the state. Athletic trainers also work within many MD offices across the state. They provide valuable insights and services to the patients in these offices.

I believe it is very hard to predict all the negative effects of this proposed action. Our healthcare system depends on strong state boards to assure that all providers provide a safe and effective level of care and this regulation must continue to include Athletic Training.

Thank you for your consideration of this important topic.

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Proposed License and Board Elimination - Athletic Training
Date: Tue Sep 05 2023 09:29:03 CDT
Attachments:

Years ago my mentors and teachers in the field of Athletic Training stood together to educate and inform the state of IOWA what Athletic Training was and how beneficial and necessary this health care profession was to Iowa citizens and especially to its student athletes across the state. They, along with visionary legislators, parents, and organizations, drafted and wrote the licensure legislation we have today. This legislation is there to protect Iowans and make sure that those in the field of Athletic Training are meeting the professional standards of care and practicing their craft within the laws of Iowa. Removing licensure and or removing the Board of Athletic Training would jeopardize Iowans safety, especially the thousands of student athletes that daily get treatment, rehabilitation, and care from Certified Athletic Trainers (ATC) in Iowa. We have over 1100 practicing ATCs in Iowa, and unfortunately that isn't enough to cover the jobs we have in our state. The need for ATCs in Iowa is as high as it has ever been, we have schools in suburban areas without a healthcare professional that is qualified to help with injuries and conditions, and in some cases life threatening situations. Removing licensure would only increase this problem as young professionals entering the field may leave the state to go to areas where there are licensure laws and where professional standards set and other health care professions can't influence Athletic Training Scope of Practice. Simply put the current law defines and protects Iowans as well as those working in the field. In addition Athletic Trainers already appear in other Iowa Codes as "Licensed Healthcare Providers". Seriously, removing licensure would not only cause an additional shortage of needed health care providers in our state, it would cost Iowans money in the long run, and most importantly if you take the money and politics out of this conversation, the most important factor is that Iowans, especially our kids involved in sports and activities across the state may not have the quality health care they need to be safe and healthy. Let's not go backwards.

Sincerely

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Ending AT Licensure in Iowa
Date: Tue Sep 05 2023 09:43:22 CDT
Attachments:

I am a current athletic training student at the Buena Vista University. I highly discourage ending the licensure in the state of Iowa, as it would impact numerous factors. If the licensure is ended, graduating athletic training student would likely leave the state and practice elsewhere. Certified athletic trainers would also likely leave the state to practice elsewhere. By ending the licensure, you are eliminating the credentials of athletic trainers, which is highly disrespectful. If Iowa goes through with this, the entire state will be taking multiple steps backwards. Considering all 50 states require licensure besides California. Thank you for your time and consideration.

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Board of Athletic Training and Licensure
Date: Tue Sep 05 2023 09:52:45 CDT
Attachments:

I am writing to voice my opposition to the elimination of the Board of Athletic Training and licensure of athletic trainers in Iowa. This is very detrimental to not just our profession, but to the thousands of patients who athletic trainers care for every day in our state. Elimination of licensure would lead to danger and safety issues for all of our physically active patients, but especially our youth athletes.

In 2018, Athletic Trainers were the driving force behind passage of HF2442, which set standards for concussion management in youth sports. Athletic Trainers are the primary licensed health care providers on the sidelines for all of Iowa's high school football games and other interscholastic sporting events. Removing our licensure would conflict with current Iowa code in this area and cause unresolvable problems for high schools trying to protect their students.

California is the only other state without regulation for athletic trainers, and I don't want to see Iowa compared to that state as the only two states who allow delinquent health care professionals to come practice and place our residents in danger.

Licensure provides the highest level of patient protection, and it is the gold standard of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.

I realize our profession requires certification from the BOC, however that is not enough. According to our current practice act, the initial certification exam is the only BOC requirement for license in Iowa. Thus, we need ongoing regulation of our profession that only licensure can ensure. I assure you that athletic trainers in good standing in Iowa want to maintain licensure. Having the regulation actually attracts people to come work here as opposed to making it more difficult.

Eliminating licensure in Iowa could potentially impact an AT's ability to practice across state

lines (travel with their team), depending on regulatory requirements in other states. (ex. some states allow you to practice in their state temporarily, provided your home state maintains the same regulatory requirements).

I also realize the goals of your committee are to deregulate and compress boards. I would like to offer some middle ground. We feel the merging Athletic Trainers with PTs, OTs, and other related professions would be reasonable and meet our needs.

Athletic Trainers are some of the hardest working health care providers, they are often overlooked and undervalued but despite that, they continue to put in overtime hours and go the extra mile for their patients on a daily basis. Taking away licensure would prolong the current battle many of us are facing when it comes to fighting for adequate compensation for our work. With the state removing a need for licensure, our fight to raise salary positions/hourly wages would be severely set back. As someone who is one of the lowest paid Athletic Trainers in the B1G conference, I am confident that reducing my credentials will hinder my current efforts to get paid what I deserve.

Please let me know if I can expand any further on anything. I can be reached on my cell phone any time at [REDACTED].

[REDACTED]

[REDACTED]

[REDACTED]

From:

[Redacted]

To: BCRCComments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Bcc:

Subject: Deregulation

Date: Tue Sep 05 2023 09:54:31 CDT

Attachments:

Good morning,

I am emailing in regards to the potential deregulation of licensing for Hearing Instrument Specialists (HIS). I am a licensed HIS for the state of Iowa where I manage offices in Vinton and Oelwein. Both of these are small towns that lack some of the specialized healthcare services that other big cities offer. I have the pleasure of educating hundreds of patients on their hearing loss and providing them with prescription hearing aids that will help them hear better and treat their hearing loss long term. I strongly believe in the importance of seeing my patients on a regular basis for hearing aid cleanings, adjustments, annual testing, and ongoing education in hopes for the best outcome possible with each and every patient. I believe that without the proper education, my job would not be able to be done safely or correctly.

During my education, I've learned that early detection is key in diagnosing hearing loss. Some people wait too long for many reasons: embarrassment, denial, budget, etc. By offering free comprehensive hearing tests I have the ability to educate them on their individual situation and the risks involved if they chose to decline treatment. By declining treatment, they are putting themselves in danger to potentially develop worse hearing loss, cognitive decline, depression, anxiety, balance issues, and overall poor quality of life. It takes a lot of skill, knowledge, compassion and empathy to do this job correctly and help our patients to the best of our ability. I strive in giving the care I'd like my own family members to receive, not some stranger who is just trying to make a buck. I hope you take these things into consideration when making your decision. Thank you for your time.

Have a great day,

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Iowa Senate File 514 - eliminating Athletic Training licensure board
Date: Tue Sep 05 2023 09:55:31 CDT
Attachments:

To whom it may concern:

I am very concerned about the proposal to eliminate state oversight of Athletic Training healthcare professionals.

Athletic trainers, as clinicians and in the Masters training program in Athletic Training, are critically important to the University of Iowa Hospitals and Clinics Department of Orthopedics and Rehabilitation. As clinicians they support our faculty in care delivery and provide primary care to injured athletes on fields, sidelines and training rooms. Additionally, they provide a valuable healthcare resource to athletes and parents who may not have easy access to a medical facility in rural areas of Iowa.

Athletic Training Licensure facts:

***** Iowa currently has 1,129 ATs who are licensed and countless students who rely on licensing.

***** Licensure protects the public and lets athletes, clients, and employers easily know an AT is properly trained, takes continuing education courses, and that their practice standards are monitored.

***** There is no expense associated with the Board of Athletic Training. The fees that ATs pay to renew their license cover all costs. They are cost-effective and are consistently in the black each year.

***** Every state and Washington D.C require licensure for ATs, except for Hawaii (which requires registration) and California (who has pending legislation).

* Athletic trainers provide medical services to all types of patients. Across the United States, in addition to practicing in traditional sports team settings, athletic trainers work in performing arts, public safety, occupational health, and with the armed forces.

* Licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.

* Eliminating licensure in IA could potentially impact an AT's ability to practice across state lines (travel with their team), depending on regulatory requirements in other states. (ex. some states allow you to practice in their state temporarily, provided your home state maintains the same regulatory requirements)

Eliminating the board and licensing for Athletic Training would be a huge step backward given the hard fought process to attain licensure in Iowa. It will increase the cost of care of injured athletes and decrease or eliminate our ability to work with these skilled providers as well as provide vital outreach Athletic Trainers to communities.

I believe it is very hard to predict all the negative effects of this proposed action. Our healthcare system depends on strong state boards to assure that all providers provide a safe and effective level of care and this regulation must continue to include Athletic Training.

My hope is that the proposed elimination of this board and AT licensure will be reconsidered and the idea will be discarded. I appreciate your time and consideration on this critically important issue.

Thank you for your time,

■

████████████████████

██

████████████████████████

████████████████████████████████

From: [REDACTED]
[REDACTED]
[REDACTED]
To: : BCRCcomments@iowa.gov
<BCRCcomments@iowa.gov> <bcrccomments@iowa.gov>
Cc:
Bcc:
Subject:
Date: Tue Sep 05 2023 09:57:08 CDT
Attachments:

I am writing in opposition to the deregulation of licensing for Hearing Instrument Specialists in Iowa.

I am a hearing instrument specialist in Iowa as well as a national board-certified hearing instruments specialist who has worked in our great state for over 10 years. Our industry is important to the people we serve and the entire community. There is many reason why having a HIS board is important number one is safety there are underlying medical issues that may be causing hearing loss and if the is no oversight on the people who fit hearing aids to make sure people are addressing those issues than that is a problem. There is also the idea of public trust. I want to know and the public wants to know that the people taking care of them are properly trained. If the public doesn't feel comfortable with their hearing care professionals then they won't take care of their hearing. I believe most people will do the right thing even without oversight from the government but it only takes one bad apple to spoil the whole batch. Please consider the population of lowans we are working with they are Vulnerable, and we must make sure they are being taken care of properly.

Thank you

[REDACTED]

Sent from Mail for Windows

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>; eric.giddens@legis.iowa.gov
<eric.giddens@legis.iowa.gov>
Cc: [REDACTED]
Bcc:
Subject: Athletic Training Licensure
Date: Tue Sep 05 2023 10:00:18 CDT
Attachments:

Dear Boards and Commissions Review Committee,

When you are watching your favorite sporting event at the High School level or higher, you will more than likely see a licensed athletic trainer come on to the field whenever there is an injury. If the Athletic Training Board is eliminated, we will go back to a time where personal trainers, fitness trainers, or the youngest member of the coaching staff who most recently took a one semester "Prevention and Care of Athletic Injuries" course assuming the role of this vital healthcare provider. This would no doubt be a step back for a profession that I have dedicated 25 years of my life towards, with 15 of those years in Iowa.

- * There are over 1,100 licensed athletic trainers in the state of Iowa.
- * The renewal fees that ATs pay fully funds the AT Board and is not a cost to the state.
- * The AT license protects the health, safety, and welfare of the public by ensuring that the ATs in the state are the qualified healthcare providers that athletes in Iowa deserve.
- * The AT Board evaluates our scope of practice and adapts that based on the rapidly changing world of healthcare. If the Board is eliminated, other healthcare providers will have influence over our scope of practice.
- * Other states, like South Carolina moved towards licensure. Thus 49/50 states have regulation. This action would make Iowa, like California, not requiring licensure for ATs.
- * The elimination of AT licensure may reduce the willingness of graduating students to stay in the state. It may also lead to currently licensed ATs leaving the state. We are already experiencing difficulty hiring ATs across the state, this would just increase the struggle, specifically in rural schools.
- * ATs appear in the Iowa Code as licensed healthcare providers, specifically in the recent concussion law that was signed, declaring ATs as licensed healthcare providers.

Thank you for your consideration in NOT eliminating the Athletic Training Board.

Sincerely,

[Redacted]

[Redacted]

PS - Licensure is so important to us, that we put it with our credentials at the end of our names. As you can see below, first after our names is the highest educational level, then LAT is for "Licensed Athletic Trainer," and ATC is for Athletic Trainer Certified which means passing the board exam.

--

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc: [REDACTED]
Subject: Respiratory licensure

The respiratory care board would like to ask a couple of questions at tomorrows hearing regarding our licensure. I am the current president of the Iowa Society. Would it be possible for me to be invited to the hearing tomorrow?

Thank you,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

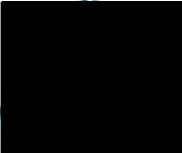
*The information contained in this message may be privileged and confidential and protected from disclosure. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by replying to the message and deleting it from your computer. Thank you. [REDACTED]

Owner:

[REDACTED]

Filename: image001.jpg

Last Modified: Tue Sep 05 10:03:34 CDT 2023



Owner:

[REDACTED]

Filename: image002.jpg

Last Modified: Tue Sep 05 10:03:34 CDT 2023



From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc: [REDACTED]
Bcc:
Subject: Iowa Interior Design Examining Board - Keep intact
Date: Tue Sep 05 2023 10:07:03 CDT
Attachments:

For the last four years, I have been working with interior designers across the state to pass SF 135. It was signed by the Governor in May of this year. This bill gives Registered Interior Designers the ability to sign construction documents for commercial projects which DIRECTLY impact the health safety and welfare of the public in these commercial buildings. It is extremely important to maintain an examining board to oversee these new rights and responsibilities of Registered Interior Designers. Subject matter experts are best equipped to handle these types of issues.

We urge the committee to maintain the examining board as it is today, especially since it is COST NEUTRAL

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: AT Licensure
Date: Tue Sep 05 2023 10:16:18 CDT
Attachments:

Good morning,

I am very concerned about the proposal to eliminate state oversight of Athletic training healthcare professionals.

As clinicians, athletic trainers are critically important as healthcare professionals to the well-being and safety of so many student-athletes, firefighters, physicians, warehouse workers, and many more. As clinicians they support a wide variety of patients and help provide high level of care that saves these patients time and money. They are important members of the healthcare community.

Eliminating the board and licensing for Athletic training would be a step backward in healthcare regulation, allow athletic training to become a free for all in our state, increase the cost of care of injured athletes and decrease or eliminate our ability to work with these skilled providers. I believe it is very hard to predict all the negative effects of this proposed action, and many lawsuits will come from it. Our healthcare system depends on strong state boards to assure that all providers provide a safe and effective level of care, and this regulation must continue to include Athletic Training.

Hopefully the proposed elimination of this board and licensure will be reconsidered and the idea will be discarded. I appreciate your thoughtful deliberation on this critically important issue.

[REDACTED]

[REDACTED]



From: [REDACTED]

To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>; kraig.paulsen@iowa.gov
<kraig.paulsen@iowa.gov>; nate.ristow@governor.iowa.gov
<nate.ristow@governor.iowa.gov>; larry.johnson@dia.iowa.gov
<larry.johnson@dia.iowa.gov>; jacob.nicholson@governor.iowa.gov
<jacob.nicholson@governor.iowa.gov>;
bsloniker@siouxlandchamber.com
<bsloniker@siouxlandchamber.com>; david.faith@ag.iowa.gov
<david.faith@ag.iowa.gov>; Janice.Weiner@legis.iowa.gov
<janice.weiner@legis.iowa.gov>; Adam.Zabner@legis.iowa.gov
<adam.zabner@legis.iowa.gov>; Jane.Bloomingtondale@legis.iowa.gov
<jane.bloomingtondale@legis.iowa.gov>; kerry.scott@legis.iowa.gov
<kerry.scott@legis.iowa.gov>; Jason.Covey@legis.iowa.gov
<jason.covey@legis.iowa.gov>; Megan.Schlesky@legis.iowa.gov
<megan.schlesky@legis.iowa.gov>; Brian.Guillaume@legis.iowa.gov
<brian.guillaume@legis.iowa.gov>

Cc: [REDACTED]

Bcc:

Subject: Re: Iowa Interior Design Examining Board - Keep intact

Date: Tue Sep 05 2023 10:19:50 CDT

Attachments:

Due to some inadvertent keyboard clicks, this email sent before it was finished. Please accept my apologies and disregard my previous email.

For the last four years, I have been working with interior designers across the state to pass SF 135. It was signed by the Governor in May of this year. This bill gives Registered Interior Designers the ability to sign construction documents for commercial projects which DIRECTLY impact the health, safety, and welfare of the public in these commercial buildings. It is extremely important to maintain an examining board to oversee these new rights and responsibilities of Registered Interior Designers. Subject matter experts are best equipped to handle these types of issues. Our professional exam administrators have no authority to regulate the practice of the profession in local jurisdictions. This is the state's responsibility.

We urge the committee to maintain the examining board as it is today, especially since it is COST NEUTRAL.

An ALTERNATE SOLUTION would be to MERGE the Interior Design Examining board with the Architectural Examining board since these professions are closely related. This

multidisciplinary board could align with the Governor's objectives and still maintain protections for the health, safety and welfare of the public in our code impacted commercial buildings.

Thank you for your attention to this important matter,



From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: DON'T COMBINE OUR CHIROPRACTIC BOARD WITH OTHERS
Date: Tue Sep 05 2023 10:19:56 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Most Sincerely,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Hearing Aid Licensing Board
Date: Tue Sep 05 2023 10:20:05 CDT
Attachments:

I am very concerned about the move to end this Board. NO OTHER STATE IN THE UNITED STATES OF AMERICA has done such a thing. This is confounding to me why Iowa wants to be first in the nation on this. Oversight is the linchpin of any profession and it's even more important now that the demand for hearing rehabilitation only grows.

I beseech you to rethink this and don't let us be first in the nation this! Audiologists need licensed hearing instrument specialists to meet the demands of any ever growing population of hearing impaired individuals especially as the complexity of hearing rehabilitation continues to grow.

[REDACTED]

[REDACTED]

NOTICE: This e-mail is intended only for the addressed party and may contain information that is proprietary/confidential or otherwise protected. If you are not the named addressee, you are not authorized to view this message. If received in error, please contact the sender and delete the communication.

From:

[REDACTED]

To:

bcrccomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

[REDACTED]

Bcc:

Subject: Iowa Interior Design Examining Board

Date: Tue Sep 05 2023 10:23:50 CDT

Attachments:

I would like to speak on September 6 about the Interior Design Examining Board.

Sincerely,

[REDACTED] er

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Hearing Aid Specialists
Date: Tue Sep 05 2023 10:26:17 CDT
Attachments: image001.jpg

Dear Boards and Commissions Review Committee members,

The idea to eliminate the Board of Hearing Aid Specialists is simply not in the public's best interests. (Do you have any idea how many people are referred to ENT's because there hearing loss was a symptom of something much greater?)

Elimination of this Board will result in the unintended consequence of:

- * Lowers hearing healthcare access
- * Eliminating consumer protection
- * Compromised patient safety
- * Tosses out hearing healthcare standards.

This is because this Board – consisting of hearing healthcare industry experts- evaluates an individual's application for licensure and issues a license if the individual meets statutory, regulatory, and board requirements. Additionally, the Board promulgates regulations to ensure consumer protections from fraud and abuse and educational standards that aligned with current practices to best serve Iowa's hearing-impaired citizens. Furthermore, this Board investigates complaints about unprofessional conduct.

Eliminating this Board may be interpreted by the U.S. Food and Drug Administration (FDA) as eliminating the ability of licensed hearing aid specialists to order the use of prescription hearing aids. Late 2022, the FDA issued regulations recategorized "traditional hearing aids," which have been dispensed by licensed hearing aid specialists for decades, as "prescription medical devices," which must be "prescribed or ordered the use of" by a licensed hearing care professional; 21 C.F.R. § 801.109. Prescription hearing aids require a written or oral authorization from a practitioner licensed by law to administer the device (C.F.R. §801.109).

It is for these reasons that it is paramount that Iowa maintains the Board of Hearing Aid Specialists.

Thank you for your attention to my concerns with eliminating the Board of Hearing Aid Specialists and I respectfully ask for your consideration. Please feel free to contact me if you would like to discuss this issue further.

Respectfully,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Owner:

[REDACTED]

Filename: image001.jpg

Last Modified: Tue Sep 05 10:26:17 CDT 2023

image001

for Print

Item: 441

Attachment

of 1)

1 221

From:

[REDACTED]

To:

kraig.paulsen@iowa.gov
<kraig.paulsen@iowa.gov>; larry.johnson@dia.iowa.gov
<larry.johnson@dia.iowa.gov>; nate.ristow@governor.iowa.gov
<nate.ristow@governor.iowa.gov>;
jacob.nicholson@governor.iowa.gov
<jacob.nicholson@governor.iowa.gov>;
bsloniker@siouxlandchamber.com
<bsloniker@siouxlandchamber.com>; david.faith@ag.iowa.gov
<david.faith@ag.iowa.gov>; Janice.Weiner@legis.iowa.gov
<janice.weiner@legis.iowa.gov>; Adam.Zabner@legis.iowa.gov
<adam.zabner@legis.iowa.gov>; Jane.Bloomingtondale@legis.iowa.gov
<jane.bloomingtondale@legis.iowa.gov>;
Jason.Schultz@legis.iowa.gov <jason.schultz@legis.iowa.gov>;
kerry.scott@legis.iowa.gov <kerry.scott@legis.iowa.gov>;
Jason.Covey@legis.iowa.gov <jason.covey@legis.iowa.gov>;
Megan.Schlesky@legis.iowa.gov <megan.schlesky@legis.iowa.gov>;
BCRCcomments@iowa.gov <bcrccomments@iowa.gov>;
Brian.Guillaume@legis.iowa.gov <brian.guillaume@legis.iowa.gov>

Cc:

Bcc:

Subject: Interior Design Examining Board elimination

Date: Tue Sep 05 2023 10:33:42 CDT

Attachments: 2023-09-01_Iowa BCRC recommendation-email response-MLC.pdf
Outlook-nutfnt5t.jpg

Hello,

Please see attached regarding elimination of the IDEB Interior Design Examining Board and why it is important to maintain a regulatory board in some way.

Thank you for your time and consideration.

[REDACTED]

[REDACTED]

Owner:

[REDACTED]

Filename: 2023-09-01_lowa BCRC recommendation-email response-MLC.pdf

Last Modified: Tue Sep 05 10:33:42 CDT 2023

Hello,

My name is [REDACTED], I'm a Registered Interior Designer living and working in Iowa. I own my own interior design business, offering commercial and residential design services in the DSM area. I'm reaching out in response to the Boards & Commissions Review Committee's August 29 recommendation to eliminate the Interior Design Examining Board. Registered interior design professionals directly impact public health, safety, and welfare, and now that Registered Interior Designers can practice independently in Iowa, an oversight board led by practitioners and subject matter experts will be more important than ever before. I urge the Committee to consider keeping some form of a regulatory board overseeing Registered Interior Designers.

During the 2023 legislative session, the Iowa Legislature passed SF 135, with overwhelming bipartisan support, which expanded the state's interior designer registration to include the ability to stamp and seal nonstructural construction plans for permitting. Registered interior designers can now practice independently with that title. With that capability, the potential for risk to public safety exists with it. So even if there was little discipline necessary for RIDs before SF 135 become law, enforcement and disciplinary capacity of RIDs will be more critical than ever before. Those matters are best left to subject matter experts and practitioners in the profession, as they are in other states.

Please note the following.

- With the passage of SF 135, Registered Interior Designers can now practice independently, therefore the need for state oversight and disciplinary capacity is paramount. Subject matter experts and practitioners are best equipped to handle such issues.
- CIDQ, the national certification body, does not handle state issues of discipline or enforcement. Regulated states employ boards for that important function.
- We urge the committee to maintain a subject matter expert led board overseeing the interior design profession, whether through maintaining the current board or merging it with the Board of Architects. Due to the overlap in practice between architecture and interior design, this framework is well positioned to handle practice issues, which is why 15 states employ this framework.

If maintaining the Interior Design Examining Board is not an option, perhaps it can be merged with the Architectural Examining Board. Joint boards are utilized in 15 states in the US currently, and due to the overlap in practice between architects and registered interior designers, such a board would uniquely qualified to enforce the law and discipline those that cause harm or break it.

Please keep a subject matter expert-led regulatory board intact for the interior design profession. Thank you for your time and consideration.

Sincerely,

[REDACTED]

[REDACTED]

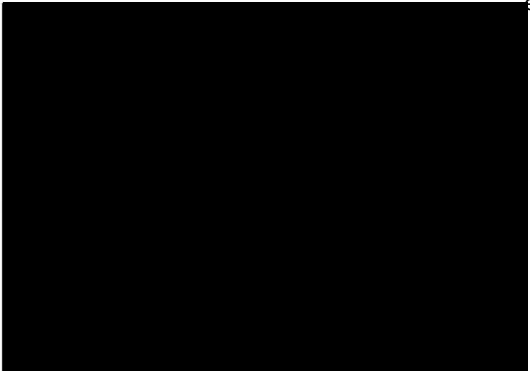
[REDACTED]

Owner:

[REDACTED]

Filename: Outlook-nutfnt5t.jpg

Last Modified: Tue Sep 05 10:33:42 CDT 2023



From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Please Maintain Regulation of Interior Designers - Public Comment in
Response to Committee Recommendation
Date: Tue Sep 05 2023 10:44:51 CDT
Attachments: image001.gif
Public Comment in Response to BCRC Rec.pdf

Hi,

Please see the attached letter of public comment in support of maintaining regulation of interior design practitioners, pursuant to the newly passed law expanding practice rights for Registered Interior Designers in Iowa.

If you have any questions, please contact me at learley@asid.org. We look forward to testifying at tomorrow's hearing. Thank you for your time and consideration.

[REDACTED]

[REDACTED]

Owner:

Filename:

image001.gif

Last Modified:

Tue Sep 05 10:44:51 CDT 2023

221

image00
for Print
Item: 44
Attachm
1 of 2

Owner:

[REDACTED]

Filename:

Public Comment in Response to BCRC Rec.pdf

Last Modified:

Tue Sep 05 10:44:51 CDT 2023



September 5, 2023

Dear Chair and Members of the Boards & Commissions Review Committee,

My name is [REDACTED], and I write today on behalf of the American Society of Interior Designers (ASID) as the Associate Director of Government and Public Affairs. I am writing today in response to the Boards & Commissions Review Committee (Committee) recommendation on August 29, 2023, to eliminate the Interior Design Examining Board of Iowa. I **strongly urge** the Committee to **maintain regulation of interior designers in Iowa**, by keeping an independent Interior Design Examining Board or by merging it with a joint disciplinary board comprised of allied professionals.

With the bipartisan passage of Senate File (SF) 135 earlier *this* year, qualified practitioners known as **Registered Interior Designers (RID) can now practice independently**, meaning title holders may stamp and seal their own nonstructural construction documents to submit for permitting. To enforce the new law and adequately monitor practitioners, maintaining state oversight of RIDs as subject matter experts is critical. I understand there has been insinuation that the Council for Interior Design Qualification (CIDQ), which is the national certification body, could regulate RIDs in Iowa but, to clarify, CIDQ does not have regulatory or disciplinary capacity or authority over RIDs, thereby **highlighting the importance of maintaining an Iowa-appointed regulatory board**.

We request the maintenance of a subject matter-led regulatory board, whether maintained as an independent Interior Design Examining Board or merged with another board of significant overlap of practice (e.g., the Architectural Examining Board) because the newly expanded practice rights for state registrants must be **overseen by design practitioners to ensure public health, safety, and well-being is protected**. If maintaining the Interior Design Examining Board is *not* an option, perhaps it can be merged with a board of allied design professionals, as previously suggested; because of the overlap of practice, these types of joint multidisciplinary boards are employed in over a dozen U.S. states and would be well positioned to enforce the new law and discipline titleholders, as necessary.

Please **maintain a regulatory board for RIDs in Iowa** – whether through an **Interior Design Examining Board or a multidisciplinary board comprised of allied professionals**. Iowans and the public will be better for it. Thank you for your consideration; please contact me at [REDACTED] with any questions you may have.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Don't eliminate our HIS board
Date: Tue Sep 05 2023 10:47:34 CDT
Attachments:

To Whom It May Concern:

My name is [REDACTED], owner of [REDACTED]. I am writing to respectfully request that our board not be eliminated as I feel it would jeopardize the quality of healthcare for the state and feel that once eliminated it will be impossible to reinstate it effectively. Because of the board being in place we are held to standards that keep us part of a health care system that is hemorrhaging providers of all types within our rural communities. We are held together and educated by board standards that keep us acting at a level still provides healthcare to our client/patients. We are taught to recognize medical issues and refer them to the proper medical authority. The board is what keeps most of us in tune with medical needs and keeps the bad actors from selling hearing aids unscrupulously to people who might just need medical treatment. I think it is very hasty to eliminate this very important aspect of the chain of healthcare within our communities. Iowa has the opportunity to showcase the importance of every member in this healthcare community instead of paving the way for corporations to make a few extra dollars when we lose one of the only ways we can distinguish ourselves from a teenager selling something at Walmart. The board certification is important and something that should not be eliminated lightly.

[REDACTED]

Sent from my iPhone

From:

[REDACTED]

To:

BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

[REDACTED]

Subject:

Do Not Deregulate!!!!

[REDACTED]

I am writing in regard of the deregulation of licensing for Hearing Instrument Specialists in Iowa.

Deregulation of licensing for Hearing Instrument Specialists would open the door for anyone to fit hearing aids—this could be catastrophic for people who really need hearing aids!!

Hearings are not just put into someone's ears & they magically help them hear better!!!

I have been an office assistant for almost 15 years & have seen the miracle & the difficulty in fitting hearing aids.

Consequences to the people who are being fit by people who have had no training or schooling could be disastrous!!!

I have seen the benefits of being fit by a professional specialist & it is so wonderful to help others hear better.

Deregulation would do more harm than good.

Please review your policy with the people who need help in mind. Helping others should be the goal!!!

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.Gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Please read my opinion, thank you
Date: Tue Sep 05 2023 10:48:15 CDT
Attachments: Letter regarding HIS board.docx

Hello,

Please see the attached letter. Thank you.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Owner:

[REDACTED]

Filename: Letter regarding HIS board.docx

Last Modified: Tue Sep 05 10:48:15 CDT 2023

Dear Boards and Commissions Review Committee members,

I write to you today, as a licensed hearing aid specialist and Audiologist. I provide hearing healthcare services to an increasingly growing population, and I wish to express my concern with the Boards and Commissions Review Committee Subcommittee’s August 29, 2023, recommendation to eliminate the Board of Hearing Aid Specialists (herein referred to as “the Board”).

The elimination of this Board will result in the unintended consequence of:

- Loss of licensure;
- Eliminating consumer protection;
- Compromised patient safety;
- Allow bad actors to defraud seniors
- Reduced hearing healthcare industry standards.

This is because this Board – consisting of hearing healthcare industry experts- evaluates an individual’s application for licensure and issues a license if the individual meets statutory, regulatory, and board requirements. Additionally, the Board promulgates regulations to ensure consumer protections from fraud and abuse and educational standards that aligned with current practices to best serve Iowa’s hearing-impaired citizens. Furthermore, this Board investigates complaints about unprofessional conduct.

Eliminating this Board may be interpreted by the U.S. Food and Drug Administration (FDA) as eliminating the ability of licensed hearing aid specialists to order the use of prescription hearing aids. Late 2022, the FDA issued [regulations](#) recategorized “traditional hearing aids,” which have been dispensed by licensed hearing aid specialists for decades, as “prescription medical devices,” which must be “prescribed or ordered the use of” by a licensed hearing care professional; 21 C.F.R. § 801.109. Prescription hearing aids require a written or oral authorization from a practitioner licensed by law to administer the device (C.F.R. § 801.109).

As an audiologist I feel it is incredibly important to regulate hearing instrument specialists as they do not possess the extensive education an audiologist is required to have, and therefore need oversight to insure they are doing their jobs correctly. The licensing test hearing instrument specialists are required to pass is an important threshold that ensures the safety of the hearing impaired population in our state. Eliminating this board creates too great of a risk to the hearing impaired, whom are also often elderly, and carry the increased risk of comorbidities such as cognitive decline, making them more susceptible to fraud.

It is for these reasons that it is paramount that Iowa maintains the Board of Hearing Aid Specialists.

Thank you for your attention to my concerns with eliminating the Board of Hearing Aid Specialists and I respectfully ask for your consideration. Please feel free to contact me if you would like to discuss this issue further.

Respectfully,

[Redacted signature block]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Board of Hearing Aid Specialist are needed
Date: Tue Sep 05 2023 10:56:04 CDT
Attachments:

Dear Boards and Commission Review Committee members:

I, [REDACTED] write to you today, as a licensed hearing aid specialist who provides hearing healthcare services to an increasingly growing population in SW Iowa, to express my concern with the Boards and Commissions Review Committee Subcommittee's August, recommendation to eliminate the Board of Hearing Aid Specialist.

I have a Bachelor of Science in Speech Pathology. I earned my degree with an emphasis in audiology. I graduated and moved to the state of Iowa. I married an Iowan. We are a farm family. We currently farm 3000 acres after years and years of saving, buying or renting we have increased over the years. My income helps our family to make ends meet. We have a daughter who is a hair stylist after graduating from Aveda institute, one at Iowa State and one who recently graduated from CHS as valedictorian who is attending SWCC. I support local schools by volunteering or working on committees or boards, and also offer support in sports, music department and speech department by donating. I support our community.

I have worked for ASI or ASIBeltone, as we merged, for 28 years. I love my job and the patients I help on a daily basis. I grew up in a family where hearing loss is a hereditary issue. I pride myself in the care and service to patients. I have worked hard over the years to go above and beyond for my patients. I provide hearing test, fit hearing aids and set up assistive devices. I work with my patients whenever they need. I support them on their hearing journey. I have been trained and educated to provide services to the hearing-impaired population. I have attended training after training to provide the best care. I feel we are valued as licensed and credentialed hearing aids dispenser. Patients trust me to care for their ears. I remove wax from ears. I walked with the patients on their journey. I am here to support the patient. I make home visits for the elderly if need. I go above and beyond. My patients are important and value my education and knowledge. It's important for Iowans to have licensed providers working with them. We do not want to open this up for anyone to act as if they can provide these services. The value of being credentialed and licensed is important. Iowans need to be protected. By having the licensure in place Iowans are sure to have trained professionals working on their ears.

If not trained professionals Iowans are subjected to:
-Limited/hearing healthcare access
-Loss of Licensure

- no consumer protection
- elderly safety is a risk—they can be taken advantage of
- laxed hearing healthcare industry standards

Our board works to provide the best care for lowans. Licensure is regulated and the requirements of training and education are met or not renewed. Additionally, the Board regulates to ensure consumer protection from fraud or abuse and educational standards are aligned with practices to provide best care for Iowa's hearing-impaired individuals. -

Eliminating this Board may be interpreted by U.S Food and Drug as eliminating the ability of licensed hearing aid specialists to order the use of prescriptive hearing aids. Late 2022, the FDA issued regulations recategorized "traditional hearing aids", which have been dispensed by licensed hearing aid specialist for decades, as "prescriptive medical devices". Prescriptive aids require written or oral authorization from practitioners licensed by the law to administer the device (C.F.R 801.109).

I provide a partnership with UHC, Aetna, Nations Hearing, Hearing Care Solutions all which require a license and an accreditation process to provide care to lowans. Some individuals I service has Iowa Medicaid. We can help provide services to these folks who have a have 3rd party partnership. I currently must be accredited licensed to be approved to provide care to these patients. I currently service Corydon, Chariton, Osceola, Creston and surrounding communities with hearing healthcare needs. I work in hospital settings in some towns and must be credentials and licensed to serve patients in those settings. To remove our license would eliminate this value and would eliminate the services provided to lowans who are already limited to services. Please do not remove our license. lowans need the safety the license provides for patient care..

Respectfully



ASI Audiology - Hearing Healthcare in Iowa
ASI Audiology provides hearing healthcare to those with hearing loss in Iowa. We have the lowest prices on the best hearing aids. Call 1.800.458.4413 to make an appointment today!
www.asiaudiology.com

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: changes to chiropractic board
Date: Tue Sep 05 2023 11:02:31 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my expert comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates issues that impact public safety. It would dilute the expertise of the board decision makers to deal with cases. Would tax volunteers to require additional meetings and hearings for different professions. The Chiropractic board is already struggling to get adequate investigations completed in a timely manner and this will only exacerbate the problem.

Iowa's Chiropractic Board is one of only 2 states in the nation where they are unable to participate in the Federation of Chiropractic Licensing Boards due to lack of funding. Frankly speaking it's embarrassing that Iowa is so far behind the rest of the country.

I ask that you leave the Chiropractic Board "as is" and request sufficient funding so that Iowa doesn't fall further behind.

Sincerely,

[REDACTED]

--

[REDACTED]

CONFIDENTIALITY NOTICE: The information transmitted in this message is intended only for the person(s) or entity to which it is addressed and may contain confidential and/or legally privileged material. Delivery of this information to any person other than the intended recipient (s) is not intended in any way to waive privilege or confidentiality. Any review, transmission,

dissemination or other use of, or taking any action in reliance upon this information by entities other than the intended recipient is prohibited. If you have received this information and you are not a named recipient, please notify me, delete the information from any computer and destroy all copies.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Board of Athletic Training
Date: Tue Sep 05 2023 11:02:40 CDT
Attachments:

To The Boards and Commissions Review Committee (BCRC)

I am reaching out with significant concern for Athletic training in Iowa. The proposed abolishment of the Iowa board of Athletic Training would be a huge mistake for healthcare in Iowa. I work with athletic trainers (ATs) every day in clinic, in the athletic training rooms and on the athletic fields/courts. I am the Head Team Physician for the University of Iowa athletics team and also provide medical oversight for Iowa City West High School. ATs are absolutely crucial and integral to the health and safety of our youth athletes in the high school and college setting. ATs specialize in dealing with urgent medical situations in sports but also in unique settings such as factories and the military. ATs require graduate medical training and 47 states and DC require AT licensure, and athletic training is a nationally recognized (AMA and HHS) health care profession. This licensure is crucial for maintaining appropriate training and scope of practice. We already have a relative shortage of ATs in our state. Losing our state licensure and oversight would make hiring ATs here even more challenging. This would affect all local high schools, colleges of all levels, many work place health systems, athletic training educational programs at U of Iowa and elsewhere, orthopaedic and other medical clinics, and many other venues.

I cannot support what the Iowa Board of Athletic Training does enough. It is absolutely vital to the health and safety of patients and athletes across the state. It's elimination would be an absolute disaster and travesty. I hope the elimination of the Board of Athletic Training is averted and reconsidered.

Sincerely,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]



From:

[Redacted]

To:

BCRCcomments@iowa.Gov
<bcrccomments@iowa.gov>

Cc:

Bcc:

Subject: FW: Hearing Instrument Specialist Deregulation - High Importance

Date: Tue Sep 05 2023 11:03:03 CDT

Attachments:

- image006.jpg
 - image007.png
 - image008.jpg
 - image009.jpg
 - image010.jpg
-

[Redacted]

[Redacted]

[Redacted]

[Redacted]

From:

[Redacted]

Sent: Tuesday, September 5, 2023 10:48 AM

To:

[Redacted]

[REDACTED]

Subject: RE: Hearing Instrument Specialist Deregulation - High Importance

Thank you! Done.

[REDACTED]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

From: [Redacted]

Sent: Friday, September 1, 2023 10:00 AM

To: [Redacted]

[Redacted]

[Redacted]

Subject: Hearing Instrument Specialist Deregulation - High Importance
Importance: High

Attached is a sample letter you can use.

Please email your letters to BCRCcomments@iowa.Gov

[Redacted]

President-Iowa Hearing Association

“Dream Big, Make Plans, Smash Goals!”

Owner:

[REDACTED]

Filename: image006.jpg

Last Modified: Tue Sep 05 11:03:03 CDT 2023

Owner:

[REDACTED]

Filename: image007.png

Last Modified: Tue Sep 05 11:03:03 CDT 2023



Owner:

[REDACTED]

Filename: image008.jpg

Last Modified: Tue Sep 05 11:03:03 CDT 2023



Owner:

[REDACTED]

Filename: image009.jpg

Last Modified: Tue Sep 05 11:03:03 CDT 2023

Page 4 of 5
Panda App for Android

Attachment 4 of 5

Owner:

[REDACTED]

Filename: image010.jpg

Last Modified: Tue Sep 05 11:03:03 CDT 2023



image010

for Print

Item: 456

Attachment

of 5)

1221

IN HEART

INSTRUMENT

SCIENCES

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: I support Athletic Trainers
Date: Tue Sep 05 2023 11:06:30 CDT
Attachments:

I am writing this in support of Athletic Trainers in the state of Iowa. Currently, 49 of the 50 states have regulation of the Athletic Training profession. To no longer require licensure would be to take a step backwards. I have worked in health care for over 20 years... Athletic Trainers by far should be the primary caregiver when it comes to immediate recognition and treatment of concussion. I have even had an athlete come back and credit me for "saving my life" when I managed to treat a concussion appropriately after being given different recommendations from other "licensed healthcare providers" Likewise, my experience has shown me that we are leaders, even among paramedics and emergency room staff when it comes to removal of football equipment in the case of emergency. Attracting and keeping athletic trainers in the state of Iowa should be of paramount importance. Often, especially in areas where it is hard to get an appointment with a primary care provider or when a student athlete is un- or under insured, the athletic trainer is the first line of health care. These students deserve to have someone in their corner who have met standards of education, certification, and continuing education. Lack of licensure may make it more difficult to keep Athletic Trainers in the state. This may as a result keep students from accessing care that they deserve and overload an already strapped healthcare system.

In the past year, there have been two very high profile cases of athletes whose lives have been saved by the actions of Athletic Trainers: Damar Hamlin, and Bronny James. Don't all of our children deserve that care?? Moving away from licensure would allow anyone to "act" as an Athletic Trainer without the government oversight. As a licensed Athletic Trainer, I pay annual renewal fees. The fees that Athletic Trainers pay, fully funds the Athletic Training board and is not a cost to the state.

Respectfully submitted,

[REDACTED]

Please be aware, any e-mail transmissions can be intercepted or misdirected. Consider communicating any sensitive information by My Chart, telephone, fax, or mail. This email communication may contain privileged and confidential information, including patient information protected by federal and state privacy laws. If you have received this transmission in error, please notify us immediately by calling [REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Board of Athletic Training
Date: Tue Sep 05 2023 11:09:38 CDT
Attachments:

[REDACTED]
[REDACTED]
[REDACTED]

1st September 2023

My Name is [REDACTED] and I am writing to you about the Boards and Commissions Review Committee's recommendation to eliminate the Board of Athletic Training in Iowa. I am strongly opposed to this elimination and implore you to do everything you can to keep this from happening.

Athletic trainers are allied healthcare professionals who specialize in the prevention, diagnosis and intervention of emergent, acute and chronic medical conditions involving impairment, functional limitations, and disabilities. Eliminating the board of athletic trainers would put the health and wellbeing of countless individuals at risk. Elimination of the board will affect the 1,129 licensed athletic trainers practicing in the state of Iowa, including myself. I work as the Athletic Trainer at Ballard Community Schools, where I provide care for hundreds of student athletes. The safety and well being of these student athletes is my top priority. The health and safety of students across the state should not be put at risk with the elimination of the Board of Athletic Training.

If student safety is not enough of a reason, every state and Washington D.C require licensure for ATs, except for Hawaii (which requires registration) and California (who has pending legislation). AT's provide medical services to all types of patients across the United States. In addition to practicing in traditional sports team settings, athletic trainers work in performing arts, public safety, occupational health, and with the armed forces. There is no expense associated with the Board of Athletic Training. The fees that ATs pay to renew their license cover all costs. They are cost-effective and are consistently in the black each year.

I hope you can see the benefit to keeping the Board of Athletic Training.

Sincerely,

[REDACTED] S

--

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Proposed elimination of Athletic Training Board
Date: Tue Sep 05 2023 11:12:01 CDT
Attachments:

I am writing you as an Iowan and an athletic trainer, who is licensed in the state of Iowa. This proposed removal of the Athletic Training licensure board is a step backwards in public protection, as well as a protection of a profession that works in many different settings but namely, in a secondary school setting.

I am currently employed as an outreach, athletic trainer that services a large high school in the state. As part of my role in the secondary school, being a licensed healthcare provider is a Frontline Provider for identification and care of concussions. The student population in my district is ever growing, whereas they do not have employer funded healthcare, but rather state aid. Due to the current state of Iowa concussion law, the students would need to be referred to external licensed healthcare providers every time any injury is suspected, thus increasing the burden of healthcare costs on the state. Currently I do not work alone but with a healthcare team to provide care to my patient population. With licensure this provides public protection that the professionals who state they are licensed are in fact licensed. The licensed individuals are able to remove as well as take the responsibility to return an athlete if safe. We stand alone and put the wellbeing of patients first, not the score or whether the player is needed for a win, but what is safest for this patient.

This is a sense of pride that I have this protection from others and that I willingly want to provide the best product for my patients and expect someone else is working within our scope of practice.

Iowa is currently one of 49 states plus Washington DC who have licensure. California is working on regulations for licensing and have come very close in past sessions.

Licensure protects others from traveling into the state harming our citizens and leaving. This also helps those who travel in and out of border cities to provide services, spending tax dollars and helping to create events, sport and or non-traditional job settings.

This move to remove a licensure board is not saving money as the board is self funded by those who are licensed. This puts undue risk on the public for no reason other than political reasons.

Do better, please for the sake of our students and public at large. Do not move to remove a self funding licensure board that is there to protect the public.

Thank you

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: State of Iowa Athletic Training License
Date: Tue Sep 05 2023 11:22:14 CDT
Attachments:

I am emailing as an Athletic Trainer on behalf of all Athletic Trainers in the state of Iowa. Below are some important facts about Athletic Training and the importance of its licensure and regulation.

*

There are over 1,100 licensed athletic trainers in the state of Iowa.

*

The renewal fees that ATs pay fully funds the AT Board and is not a cost to the state.

*

The AT license protects the health, safety, and welfare of the public by ensuring that the ATs in the state are the qualified healthcare providers that athletes in Iowa deserve.

*

The AT Board evaluates our scope of practice and adapts that based on the rapidly changing world of healthcare. If the Board is eliminated, other healthcare providers will have influence over our scope of practice.

*

Other states, like South Carolina moved towards licensure. Thus 49/50 states have regulation. This action would make Iowa, like California, not requiring licensure for ATs.

*

The elimination of AT licensure may reduce the willingness of graduating students to stay in the state. It may also lead to currently licensed ATs leaving the state. We are already experiencing difficulty hiring ATs across the state, this would just increase the struggle, specifically in rural schools.

*

ATs appear in the Iowa Code as licensed healthcare providers, specifically in the recent concussion law that was signed, declaring ATs as licensed healthcare providers.

[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc: John Cacciatore
<john.cacciatore@policyworksllc.com>
[REDACTED]
Subject: State's Boards and Commissions Review Committee
[REDACTED]

Hello,

Requesting to have written communication presented to the State's Boards and Commissions Review Committee.

Contact: [REDACTED]

Representing: IPOPA (Iowa Prosthetics, Orthotics and Pedorthics Association)

Board: Podiatry

Written Comment: Maintaining the representation of O&P on their licensing board is necessary due to the unique training required to obtain a license and produce unique custom-fitted products that help lowans maintain their quality of life and participate fully in the workforce. The current Podiatry Board process works, why change it? IPOPA is concerned merging the Podiatry Board into another board will dilute the representation of O&P. The O&P field has a substantial overlap with Podiatry as the patients we are serving revolve around the lower extremity, including feet. We request that the committee reach out to stakeholders like IPOPA to discuss what is being considered and receive direct feedback about the possible ramifications and outcomes from those in the field providing the services.

Thanks,

[REDACTED]
[REDACTED]

[REDACTED]

Empowering Human Potential

HangerClinic.com | AMPOWER

Connect With Us: Facebook | Instagram | YouTube | Twitter

This message is [REDACTED] property, intended only for the person or entity to which it is addressed and may contain information that is privileged, confidential, and/or protected from disclosure under applicable law. Any review, retransmission, dissemination or other use of this information, including but not limited to taking action in reliance upon it, by persons or entities other than the intended recipients is strictly prohibited. If this message was received in error, delete it immediately and notify the sender.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic Training in Iowa
Date: Tue Sep 05 2023 11:22:52 CDT
Attachments:

To whom it may concern,

As one of the over 1000 Athletic Trainers in our state, I cannot stress the importance of maintaining our regulating bodies in order to insure the protection of the Athletes in our State. Reducing or eliminating regulation will lead to the reversion of Athletic Training practice in our state to the previous climate of Athletic Training where literally anyone could serve as the "Athletic Trainer" at their place of employment as that employer saw fit.

Athletic Training is a healthcare profession and we ATs are responsible for the health and wellbeing of a specific population. One must obtain an advanced degree from an Accredited Institution with very specific coursework and hundreds of hours of clinical training in order to become eligible for Board testing at a National level. We have national regulation via this national board exam to initially become credentialed to practice but, as you know in many other areas for professional organizations, it is the States that are ultimately responsible for the adherence to and maintenance of educational competency via Licensure and Board regulation. We must have a standard of practice and system of vetting applicants or current licensees, or we will be headed to the unregulated randomness as seen in, and only in, the State of California which does not regulate Athletic Training at the State level.

I fully understand the streamlining and reduction of governmental burden in some areas and that the task of the Boards and Commissions Review is great but reduction for a profession that provides healthcare to the athletes in the state (in many instances the youth) cannot be part of this. Additionally, this proposed reduction will not affect cost-saving measures as the Board of Athletic Training operates without funding from the State as the members are volunteers and they do meet virtually.

I urge you to support our efforts to maintain our Licensure and Board as is, without modification.



From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Fwd: HIS Deregulation Rebuttal
Date: Tue Sep 05 2023 11:24:07 CDT
Attachments: HIS Deregulation Rebutal.pdf

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

President-Iowa Hearing Association

“Dream Big, Make Plans, Smash Goals!”

Begin forwarded message:

From: [REDACTED]
Date: September 5, 2023 at 10:31:58 AM CDT
To: [REDACTED]
Subject: HIS Deregulation Rebuttal

Thank you,
[REDACTED]

Owner:

[REDACTED]

Filename: HIS Deregulation Rebutal.pdf

Last Modified: Tue Sep 05 11:24:07 CDT 2023

09/01/2023

To whom it may concern,

I am writing this letter in regards to the possibility of deregulation of liscensing for hearing instrument specialists here in Iowa. I am a Patient Care Coordinator here in my company meaning I take care of issues not involing the hearing aids. I see first hand how much more beneficial it is for patients to have regular set appointment's with a professional that knows how to get them what they need as well as be as comfortable as possible. The deregulation of liscensing here in Iowa would make it extremely difficult for the elderly population to receive the help that I truely believe that they need, there are plenty of over the counter hearing aid vendors that give technology out with no direction, no follow up ect. The specialist can help discover underlying conditions and send patients to the corect places to make sure they are taking care of things that would otherwise go un noticed. As of now our specialist that are liscensed here in Iowa are the few people that sell what is classified as a "Prescription" hearing aid meaning it is fit specially for the patients specific hearing loss leading to better and more useful results. I believe that overall there is a extremely superior benefit to there being a separation between anybody and someone who specialises, proven by a test that they are the best at what they do. With this, please take our thought into account when making this decision for it is not one to be made lightly.

[Redacted signature block]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Board of Athletic Training Concern
Date: Tue Sep 05 2023 11:24:15 CDT
Attachments:

To Whom It May Concern:

First off, thank for your time reading my email and hearing out my concern. As a lifelong community member of southwest Iowa this topic is very concerning. As I hope most of you know that athletic trainers have finally started to make it to communities and school in our rural area. I am an athletic trainer that lives in Clarinda and I help provide medical coverage to area athletes via the school and at Pella Corporation. I truly hope you have the opportunity to hear us, as athletic trainers, out and see the importance of having a board that provides scope of practice guidance and protects the public from untrained person.

As a member of IATS, we received notice from our lobbyists today that the state of Iowa has been reviewing the 500+ licensure boards in the state and in an attempt to reduce "government spending and oversight" have recommended that the Athletic Training Licensure Board be eliminated. The reasoning for this, in the past 5 years there have been only 2 complaints before the board. Other reasons given were:

"That there did not seem to be a need for the state to regulate ATs. They also stated that most ATs are imply employed by the schools that would determine the 80s viability instead of a licensing system. When asked who would determine and protect our scope of practice and the director stated that other professionals would help with that. We explained that professions overlap with scope practice and that scope was determined by license, education and training, not other professions."

Athletic Training is a healthcare profession and we ATs are responsible for the health and wellbeing of a specific population. One must obtain an advanced degree from and Accredited Institution with very specific coursework and hundreds of hours of clinical training in order to become eligible for Board testing at a National level. We have national regulation via this national board exam to initially become credentialed to practice but, as you know in many other areas for professional organizations, it is the States that are ultimately responsible for the

adherence to and maintenance of educational competency via Licensure and Board regulation. We must have a standard of practice and system of vetting applicants or current licensees, or we will be headed to the unregulated randomness as seen in, and only in, the State of California which does not regulate Athletic Training at the State level.

I fully understand the streamlining and reduction of governmental burden in some areas and that the task of the Boards and Commissions Review is great but reduction for a profession that provides healthcare to the athletes in the state (in many instances the youth) cannot be part of this. Additionally, this proposed reduction will not affect cost-saving measures as the Board of Athletic Training operates without funding from the State as the members are volunteers and they do meet virtually.

I beg for your support with our efforts to maintain our Licensure and Board as is, without modification.

--

Thank you,

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

"We are dedicated to providing health and wellness to our communities with Compassionate, Respectful, Holistic, and Collaborative care."

Privileged/Confidential Information may be contained in this message. If you are not the addressee indicated in this message (or responsible for delivery of the message to such person), you may not copy or deliver this message to anyone. In such case, you should destroy this message and kindly notify the sender by reply email. Please advise immediately if you or your employer do not consent to Internet email for messages of this kind. Opinions, conclusions and other information in this message that do not relate to the official business of Clarinda Regional Health Center shall be understood as neither given nor endorsed by it.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Opposition to elimination of Iowa AT Board
Date: Tue Sep 05 2023 11:27:55 CDT
Attachments: NSATA Opposition of Iowa Eliminating AT Board .pdf

Good morning. Please accept the attached letter sent on behalf of the NSATA and NSATA President Denise Marshall. This letter opposes the proposed elimination of the Iowa Athletic Training Board.

Please let me know if you have any questions or need additional information.

Sincerely:

[REDACTED]

Owner:

[REDACTED]

Filename:

NSATA Opposition of Iowa Eliminating AT Board .pdf

Last Modified:

Tue Sep 05 11:27:55 CDT 2023



September 3, 2023

To Whom it May Concern:

The Nebraska State Athletic Trainers' Association (NSATA) appreciates the opportunity to submit this letter in opposition to eliminating the Iowa Board of Athletic Training. As a Professional Association in a bordering state, we feel that eliminating this Board could negatively impact our members who hold licenses and practice Athletic Training in both states. Further, we feel that elimination of this Board bears significant ramifications to public safety and is in direct conflict with the departments stated vision of protecting the health of the individuals, families, and communities within Iowa. We would encourage the Boards and Commissions Review Committee to reexamine and reconsider their recommendation and ensure that the licensing process for Athletic Trainers in the state of Iowa remains unchanged, and that the Iowa Board of Athletic Training continues as is.

Athletic Trainers are health care professionals who, in accordance with the Iowa Athletic Training Practice Act, provide services consistent with their professional preparation and education under the direction of a licensed physician. Licensure and the work of the Board ensures a process through which licensees must demonstrate initial and ongoing professional preparation and education to provide athletic training services. In doing this, it also provides the public with the confidence that those who are calling themselves Athletic Trainers and providing athletic training services have participated in a requisite process verifying the qualifications required to hold the title of Athletic Trainer.

In closing, we would reiterate our opposition to eliminating the Board of Athletic Training. While we can appreciate and understand the intent of this exercise by the Boards and Commissions Review Committee, we cannot support an act which jeopardizes the health and safety of athletes by eliminating the process which is designed to promote consistency in the vetting and oversight for applicants and credential holders.

Sincerely:

[Redacted signature]

NEBRASKA STATE ATHLETIC TRAINERS' ASSOCIATION

From: [REDACTED]
[REDACTED]
To: BCRCComments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Iowa Hearings Specialists
Date: Tue Sep 05 2023 11:29:36 CDT
Attachments:

Dear Boards and Commissions Review Committee members,

I write to you today, as an office manager for licensed hearing aid specialists who provide hearing healthcare services to an increasingly growing population, to express my concern with the Boards and Commissions Review Committee Subcommittee's August 29, 2023, recommendation to eliminate the Board of Hearing Aid Specialists (herein referred to as "the Board").

The elimination of this Board will result in the unintended consequence of:

- Limiting/ lowering hearing healthcare access;
- Loss of licensure;
- Eliminating consumer protection;
- Compromised patient safety;
- Individual complacency;
- Reducing competition; and
- Laxed hearing healthcare industry standards.

This is because this Board – consisting of hearing healthcare industry experts- evaluates an individual's application for licensure and issues a license if the individual meets statutory, regulatory, and board requirements. Additionally, the Board promulgates regulations to ensure

consumer protections from fraud and abuse and educational standards that aligned with current practices to best serve Iowa's hearing-impaired citizens. Furthermore, this Board investigates complaints about unprofessional conduct.

Eliminating this Board may be interpreted by the U.S. Food and Drug Administration (FDA) as eliminating the ability of licensed hearing aid specialists to order the use of prescription hearing aids. Late 2022, the FDA issued regulations recategorized "traditional hearing aids," which have been dispensed by licensed hearing aid specialists for decades, as "prescription medical devices," which must be "prescribed or ordered the use of" by a licensed hearing care professional; 21 C.F.R. § 801.109. Prescription hearing aids require a written or oral authorization from a practitioner licensed by law to administer the device (C.F.R. § 801.109).

On a more personal note, I myself have been a hearing aid user for about ten years now. I have had a hearing loss for most of my adult life but was unaware of this until I decided to have my hearing tested and was fit at the age of 42 by a licensed hearing aid specialist with hearing aids. My hearing loss is very unique. It is what we call a "cookie bite". With this type of sensorineural hearing loss that affects my ability to hear in the mid-range frequency. On the audiogram, it looks like the shape of a U thus giving the name "cookie bite". With this type of hearing loss, the programming of my hearing aids was done by a hearing instrument specialist. This type of loss could not be helped by just wearing a pair of OTC hearing that I could buy and use without the uniqueness of programming. Programming done by a licensed professional is so important when fitting people with hearing aids. There are so many things that come into play when a person is diagnosed with a loss. Not just anyone could do the programming. If you were licensed and trained, you would have the knowledge needed to accomplish this task in a professional manner for a loss like mine. Everyone's hearing is different and no one hears the same as the other person. Maintaining knowledge, training, and professional trainings with our hearing aid companies is vital to give patients the opportunity to get what they are paying for. With all that new technology out there to help the patient deal with their loss, why would you compromise the training of people to teach patients the facts about what they are wearing and all the possibilities for them to have a better life that involves communication.

If I were not fit with hearing aids properly ten years ago, I would not be able to hear birds sing, the blinker of my car, sirens, people talk on the phone and in other situations. I believe this plays a part in someone's personal safety also. How could you possibly short someone's own safety?

I would want the best for the patients that we work with as that is our goal within our office. Trainings and maintaining knowledge of hearing and the new technology that is out there, should be a requirement of each person who is to fit patients with hearing aids. It is the upmost important part of our business. You wouldn't want to give our patients anything but that.

Please keep hearing healthcare licensing a part of Iowa's responsibility to the patients with a hearing loss. It is for their safety and well-being.

Thank you for your time,

[Redacted signature]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Iowa Athletic Training Licensure
Date: Tue Sep 05 2023 11:30:04 CDT
Attachments:

Good Morning,

My name is [REDACTED], and I am a resident of Iowa City, IA. I have been an athletic trainer with the Iowa Football team for the past 8 years. I have a young growing family and hope that my kids can someday participate in sports with the presence of a licensed athletic trainer. Licensed athletic trainers and their training are crucial for the safety athletes of all ages.

I am reaching out to comment on the proposed changes to committees/boards in our state and particularly the recommended elimination of the Board of Athletic Training. I cannot begin to state how alarming this is for the safety of athletes in this state. Athletic trainers play a vital role in the safety of young athletes playing sports in our state daily. The presence of athletic trainers allows coaches to coach and allows a licensed healthcare provider to prevent, evaluate, treat, and rehabilitate injuries. Additionally, if an emergency occurs, athletic trainers are present to provide the necessary immediate care and activate an emergency action plan/response. Finally, and more specifically, with concussion care being such an important and vital topic, having trained professionals who can diagnose and treat head injuries accurately and effectively is necessary for safe participation in sports.

There are many stories of the importance of athletic trainers, too many for this one email, but I will share a few. [REDACTED], who graduated from Pleasant Valley High School and played football at Iowa, was working out in Bettendorf and collapsed. An athletic trainer's quick and effective response to his cardiac issue is why he is still alive today. Last year, athletic trainers at two different high schools in Iowa accurately diagnosed internal organ damage and saved their athlete's lives. Athletic trainers at a university in Iowa saved the life of a basketball manager during practice a few years ago and saved an athlete from paralysis last year by properly treating a cervical spine injury. I could go on and on with more stories. In each case you needed a licensed healthcare professional there, on site, to have a positive outcome. Having to call medical help or having someone without the right qualifications present could have led to a poor outcome. Athletic trainers are the professionals that are trained to be on site and take care of these injuries.

If the licensing system for athletic trainers was removed, it would be up to the schools who are hiring athletic trainers determine the viability of an individual to be an athletic trainer. That means the schools and often athletic administrators or coaches who are not trained in healthcare will be charged with determining who is qualified to provide healthcare. While I have respect for athletic administrators and coaches, they are not the best individuals to hire a healthcare provider. Overall, this change hurts the public and makes participation in sport less safe.

Additionally, by removing the licensure system from our state, we would rely only on the Board of Certification (BOC) exam as a way of assessing the quality of an athletic trainer. While this exam is designed to protect the public by screening recent graduates for basic knowledge and skill, a means for our state to monitor athletic trainers and ensure continuing education is necessary for public protection as best practices will naturally evolve over an athletic trainer's career.

The move to eliminate the Board of Athletic Training is a backward movement in comparison to the rest of the country. Across the US, 49/50 states have some form of regulation of the profession of athletic training. The one remaining state has an active bill that would require regulation of the practice of athletic training. Licensure is required in 47/50 states. Thus, by moving away from licensing athletic trainers in our state, we would be moving in the opposite direction of everyone else and in this case, being different is not a good thing.

Thank you,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Confidentiality Notice:

This e-mail (including attachments) is covered by the Electronic Communications Privacy Act, 18 U. S. C. Sections 2510-2521, is confidential and is legally privileged. The information included in this e-mail and any attachment is intended only for the personal and confidential use of the individual or entity to which they are addressed. If you as the reader are not the intended recipient, you are hereby notified that you have received this communication in error

and that any retention, review, use or distribution of this communication or the information contained in it is strictly prohibited. If you received this e-mail in error, destroy it immediately and please notify the sender of this message.

From: [REDACTED]
[REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: opposition to the deregulation of licensing for Hearing Instrument specialist in Iowa
Date: Tue Sep 05 2023 11:34:12 CDT
Attachments:

I am writing in opposition to the deregulation of licensing for Hearing Instrument specialist in Iowa. Last year we fit over 4000 Iowans with hearing aids from licensed trained professionals.

There are countless reasons why the de regulation of our profession is a terrible idea. We fit prescriptive medical devices that require extensive training and licensing to be able to fit patients properly and effectively. In the course of our work, we are trained to discover underlying medical conditions that can be medically serious that require the intervention of a doctor or ENT. These conditions can be something as simple as impacted earwax, or something more significant like brain tumors. Untrained and unlicensed individuals have no ability to recognize these serious, underlying medical conditions, and these patients would go untreated, and could have a very significant impact on their health.

Last October the FDA approved over the counter hearing aids. They develop two classifications of hearing aids. Over-the-counter hearing aids require no hearing test no evaluation and are not seen by a licensed professional. The other class of hearing aids are referred to as prescription hearing aids. Prescription, hearing aids are required to be fit a licensed professional. This would eliminate the entire category of prescription hearing aids with deregulation. Prior to the launch of over-the-counter hearing aids there were many surveys done throughout the industry to evaluate the public's perception of the need of a license professional to fit and treat the hearing loss properly. In countless studies up to 96% of individuals acknowledged the importance of the interaction with a licensed hearing care professional to properly treat their hearing loss.

Since the launch of over-the-counter hearing aids, our business is actually up by over 20%. Over-the-counter hearing aids have had no impact whatsoever on the hearing aid industry. I believe this solidifies the understanding and the need for licensed trained professionals to treat the patients properly and effectively.

Deregulation of licensing for hearing instrument specialist would open the door for anyone to fit the unknowing and vulnerable, predominantly, senior population. The outcomes of these fittings would be very poor and the consequences to the patients would be astronomical. If a person tries hearing aids and is unsuccessful with them statistically they wait 5 to 7 years to try hearing aids again. In the course of that time the hearing loss can become so great that hearing aids even at a premium level are ineffective. Recent studies have shown that untreated hearing loss has a significantly higher chance of developing Alzheimer's and

dementia. There are higher risks of falling, social isolation, and depression for those with untreated, hearing loss.

The International Hearing Society administers the license exam for hearing instrument specialist in 40 states. There is significant training and learning involved to be able to pass the international license exam. The exam is designed to prove total competency to be able to safely and effectively work in our profession. Even with this extensive training the first time pass rate of the exam is only 60%. So even properly trained individuals require a great deal of time to be able prove competency. What would an individual with no training whatsoever be able to do for an unsuspecting person in need of proper hearing healthcare?

There are many other reasons why eliminating the hearing instrument specialist board is a very poor idea for the interest of thousands of lowans. Please take this into consideration, thank you.

Thank you,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Hearing Instrument Specialist's Board Comment from a BC-HIS
Date: Tue Sep 05 2023 11:42:40 CDT
Attachments: Outlook-hqmqaahc0.png
Outlook-ke5bmxyv.png
Outlook-ppgueqsx.png

To whom it may concern,

I am a Hearing Instrument Specialist and have been for almost a decade. I receive immense joy from helping patients hear what they have been missing. I have a large patient database that has very few options to choose from if they were to only go to an Audiologist. We live in the Waterloo/Cedar Falls area. There are long waits to get into an ENT and/or audiologist. As a matter of fact, we currently are receiving patients from an ENT office because they are short-staffed.

Hearing Instrument Specialist play an important role in the hearing society. In my experience, many Audiologists did not go to school to graduate and work in hearing aid clinic. They wanted to work in a hospital or family practice. They did not want to work for a company with set targets, and professional goals to fit more patients in hearing aids. This is where Hearing Instrument Specialists can help. They understand what work environment they will be in from the start.

In conclusion, I feel that Hearing Instrument Specialists, working in conjunction with Audiologists, can help more patients hear their families and friends with less wait time and greater reach.

If you have any other questions or need additional comments, please feel free to contact me.

[REDACTED]

audibel.com | audibelpro.com | map | email

NOTICE: This e-mail is intended only for the addressed party and may contain information that is proprietary/confidential or otherwise protected. If you are not the named addressee, you are not authorized to view this message. If received in error, please contact the sender and delete the communication.

Owner:

[REDACTED]

Filename: Outlook-hqmqahc0.png

Last Modified: Tue Sep 05 11:42:40 CDT 2023



Owner:

[REDACTED]

Filename: Outlook-ke5bmxyv.png

Last Modified: Tue Sep 05 11:42:40 CDT 2023

Outlook-ke5bmxyv.png for Print
Item: 476 (Attachment 2 of 3)

Page 803 of 1221

A U D I O T A P

Owner: Joel Myers <joel_myers@audibel.com> on behalf of Joel Myers
<Joel_Myers@Audibel.com> <joel_myers@audibel.com>
Filename: Outlook-ppqueqsx.png
Last Modified: Tue Sep 05 11:42:40 CDT 2023

From: [REDACTED]
To: BCRCcomments@iowa.gov
<brcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Board of Dietetics
Date: Tue Sep 05 2023 11:47:04 CDT
Attachments:

My name is [REDACTED]. I am a registered and licensed dietitian, and writing to let you know that I strongly disagree with the elimination of the Board of Dietetics and our licensure. The Board has always been self-funded, meaning no tax dollars are involved; it is not vacant; and the Board already meets recommendations 3 (virtual or hybrid options), 4 (convene only as needed), 6 (compensating members), and 8 (clear licensing standards) released in the Boards & Commissions Review Committee report.

The Board of Dietetics exists to protect Iowa citizens from unethical, harmful nutrition care. Similar to other healthcare professions, becoming a dietitian involves completing a rigorous, evidence-based curriculum and supervised internship, passing a qualification exam, and taking yearly continuing education.

Licensure is particularly important in the context of medical nutrition therapy, which is specialized nutrition care seen in hospitals, clinics, long-term care, and private practice. Through MNT, dietitians manage various medical conditions: diabetes, kidney disease, malnutrition, GI disorders, and nutrition support through feeding tubes or IV; as well as providing nutritional guidance within the setting of surgeries, drugs or treatments. This is just a partial list.

Further, the livelihood of many Iowa dietitians depends on their services being reimbursed by payers who require that healthcare professionals be licensed in order to receive reimbursement. It is in Iowa law that MNT and therapeutic diets MUST be provided by licensed and registered dietitians in order to receive insurance payment.

On a national level, the Academy is working to streamline licensure by introducing an interstate compact. We strongly support this effort as it would significantly ease the burden of Iowa dietitians needing to be licensed in multiple states; and, with the increase of telehealth, broadens the income opportunities of dietitians. The Compact would also support active duty military and their spouses. We need to retain licensure in order to hold Compact privilege.

Our request:

1. Retain the Iowa Board of Dietetics.
2. Retain licensure of registered dietitians and dietitian technicians, registered.

Nutritionally,

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Fw: Athletic Trainer licensure
Date: Tue Sep 05 2023 11:52:18 CDT
Attachments:

From: [REDACTED]
Sent: Sunday, September 3, 2023 11:21 AM
To: [REDACTED]
Subject: Athletic Trainer licensure

You don't often get email from [REDACTED]. Learn why this is important

CAUTION: This email originated from outside of BVU. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello, I am a certified/licensed Paramedic with Critical Care Paramedic endorsement. I am writing in regards to imploring you and the state to keep licensure for Athletic trainers in the state of Iowa. It is vital that AT's have this. It like EMT/Paramedics and others in the medical profession having licensure. It aids in oversight of the profession, and provides a basis for standardized competency and education needed to maintain the knowledge they've learned. It also provides that they are able to practice when they cross state lines when those that work for sports teams when they travel. Thank you for your time in this matter...

Sincerely,

[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: IOWA HEARING ASSOCIATION DEREGULATION
Date: Tue Sep 05 2023 11:54:39 CDT
Attachments:

I am writing in opposition to the deregulation of licensing for Hearing Instrument specialist in Iowa. I have been licensed in Iowa for the last 2 years. I work for the largest employer of hearing instrument specialist in Iowa with 41 hearing specialist. Last year we fit over 4000 Iowans with hearing aids from licensed trained professionals.

There are countless reasons why the de regulation of our profession is a terrible idea. We fit prescriptive medical devices that require extensive training and licensing to be able to fit patients properly and effectively. In the course of our work, we are trained to discover underlying medical conditions that can be medically serious that require the intervention of a doctor or ENT. These conditions can be something as simple as impacted earwax, or something more significant like brain tumors. Untrained and unlicensed individuals have no ability to recognize these serious, underlying medical conditions, and these patients would go untreated, and could have a very significant impact on their health.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: AT Licensure in Iowa
Date: Tue Sep 05 2023 11:54:49 CDT
Attachments: image001.png

To Whom It May Concern:

I am writing regarding the proposed license elimination for athletic trainers in the state of Iowa. Please note the following:

- * There are over 1,100 licensed athletic trainers in the state of Iowa.
- * The renewal fees that ATs pay fully funds the AT Board and is not a cost to the state.
- * The AT license protects the health, safety, and welfare of the public by ensuring that the ATs in the state are the qualified healthcare providers that athletes in Iowa deserve.
- * The AT Board evaluates our scope of practice and adapts that based on the rapidly changing world of healthcare. If the Board is eliminated, other healthcare providers will have influence over our scope of practice.
- * Other states, like South Carolina moved towards licensure. Thus 49/50 states have regulation. This action would make Iowa, like California, not requiring licensure for ATs.
- * The elimination of AT licensure may reduce the willingness of graduating students to stay in the state. It may also lead to currently licensed ATs leaving the state. We are already experiencing difficulty hiring ATs across the state, this would just increase the struggle, specifically in rural schools.
- * ATs appear in the Iowa Code as licensed healthcare providers, specifically in the recent concussion law that was signed, declaring ATs as licensed healthcare providers.

Please keep practice standards in place to ensure the right people are caring for our athletes.

Sincerely,

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Be brave. Be curious. Be kind.

Owner:

[REDACTED]

Filename: image001.png

Last Modified: Tue Sep 05 11:54:49 CDT 2023



From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Hearing Aid Dispensing license
Date: Tue Sep 05 2023 11:57:06 CDT
Attachments:

TO Whom it May Concern:

I have been in this industry for 12 years and love my job and my patients. I also know what I am doing due to the time I have been in the industry and my continuing education. If this license is revoked a lot of people would be out of hearing aid technology help which would lead people to not being happy with hearing aids or hearing aid technology. In my 12 plus years I have found that hearing aids can not be just fit over the counter for a proper fit and prescription. Patients need direction and help with everything. Please continue keeping the Hearing Aid Dispensing License on our Iowa licenses.

Thank you for your time

[REDACTED]

[REDACTED]

[REDACTED]

Sent from Mail for Windows

NOTICE: This e-mail is intended only for the addressed party and may contain information that is proprietary/confidential or otherwise protected. If you are not the named addressee, you are not authorized to view this message. If received in error, please contact the sender and delete the communication.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc: dawn.driscoll@legis.iowa.gov
<dawn.driscoll@legis.iowa.gov>
Bcc:
Subject: Athletic Training Licensure Board
Date: Tue Sep 05 2023 12:02:35 CDT
Attachments:

To Whom It May Concern,

I have been made aware that the state of Iowa is considering eliminating the Athletic Training Licensure Board. I felt it imperative that I email about my concerns. This would be a huge problem for not only athletic trainers in the state of Iowa, but also the student-athletes we serve. It is my opinion that the state of Iowa is already behind when it comes to high school athlete safety, removing the Athletic Training Licensure Board would put us even further behind.

First, our athletic training licensing dues pay for the board, so for that reason alone it should not be eliminated. The fact that there have only been two complaints in front of the board in the last five years is amazing! That is something that athletic trainers and the state of Iowa should be very proud of! It is not a reason to get rid of the licensure board.

I am a high school outreach athletic trainer that is employed by a hospital. I do not know any high school athletic trainers that are employed directly by a school district. I work directly with our directing physician; however, it should not be his responsibility to determine my scope of practice. The athletic trainers employed by the hospital should not be an additional burden to the directing physician or the other physicians by way of them deciding what we can and cannot do. Does that mean that the scope of practice would be different for every athletic trainer based on their directing physician? This is something that needs to be governed so it is the same for every athletic trainer in the state.

This will also greatly harm student-athletes. Without a licensure board, people can pose and work as athletic trainers without any disciplinary action. This is not safe for student-athletes. Does this person have on field emergency management training? Are they aware of the school's emergency action plan? Do they have training and education in concussion identification and management? Do they have any medical education at all? Do you want someone that has no

clue what they are doing being the one on the field taking care of your child?

Being an athletic trainer is a lot more than taking care of bloody noses and taping ankles. It seems to me that whoever wants to eliminate the board is unaware of that, and to be frank, it is very insulting. Eliminating the licensing board would in turn eventually eliminate the majority of athletic trainers in the state of Iowa. We want to be protected. We want to know that the other person on the sideline with a med kit is also an athletic trainer and not someone that doesn't have the same level of education and training.

Please protect the student-athletes of Iowa. Please protect the athletic trainers in Iowa. Please do the right thing and keep our licensing board in place.

Thank you,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Confidentiality Notice:

This email message, including any attachments is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic Trainers
Date: Tue Sep 05 2023 12:04:24 CDT
Attachments: image001.png

To whom it may concern:

I am very concerned about the proposal to eliminate state oversight of Athletic training healthcare professionals.;

Athletic trainers as clinicians and the Masters training program in Athletic training are critically important to the Department of Orthopedics and Rehabilitation. As clinicians they support our faculty in care delivery and provide primary care to injured athletes on the field, sideline and in the training room. They are important members of our musculoskeletal healthcare system. Educationally our three Athletic training faculty run an outstanding Master's Program that produces highly skilled graduates on a yearly basis. They are integral members of our faculty and their program fits well with the other educational programs in our department and in the College of Medicine.

Eliminating the board and licensing for Athletic training would be a step backward in healthcare regulation, allow athletic training to become a free for all in our state, increase the cost of care of injured athletes and decrease or eliminate our ability to work with these skilled providers. I believe it is very hard to predict all the negative effects of this proposed action. Our healthcare system depends on strong state boards to assure that all providers provide a safe and effective level of care and this regulation must continue to include Athletic Training.

Hopefully the proposed elimination of this board and licensure will be reconsidered and the idea will be discarded. I appreciate your thoughtful deliberation on this critically important issue.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

This message is confidential, intended only for the named recipient(s) and may contain information that is privileged or exempt from disclosure under applicable law. Any patient health information must be delivered immediately to intended recipients(s). If you are not the intended recipient(s), you are notified that the dissemination, distribution or copying of this message is strictly prohibited. If you receive this message in error, or are not the named recipient(s), please notify the sender at either the e-mail address or telephone number above and discard this e-mail. Thank you.

Owner:

[REDACTED]

[REDACTED] >

Filename: image001.png

Last Modified: Tue Sep 05 12:04:24 CDT 2023

image001.png for Printed Item
487 (Attachment 1 of 1)

Page 820 of 1221

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Board of Athletic Training
Date: Tue Sep 05 2023 12:14:25 CDT
Attachments:

To whom it may concern,
As a certified and licensed athletic trainer I was shocked to hear of the proposal to cut the Board of Athletic Training from the state of Iowa. Today, more than ever, athletic trainers are in the news involving the health, wellbeing, and safety of our athletes. Athletic Trainers have undergone extensive training and are essential health care providers. We see athletes and active individuals in all aspects of life, in the community, and in their job settings. Athletic Trainers have been in the national spotlight lately for saving lives, such as Damar Hamling and Bronny James. We are trained in emergency care and are on site at many athletic events. We are also available to provide medical evaluations, treatment plans, and rehabilitation exercises. It is appalling to me that we would even consider removing the licensure that protects the public and lets the public know that athletic trainers are properly trained and have engaged in ongoing continuing education. How will we protect our children, as well as adults, from being treated by untrained individuals? Wouldn't you want to know that the individual treating you has the proper training, especially when your life depends on it? Athletic Trainers also help develop policies to keep our athletes safe, such as concussion protocols and practicing in the heat. This is a matter of safety that cannot be ignored. I hope that you will see the only reasonable side here and maintain the Board of Athletic Training and the licensure requirement in the state of Iowa.

--
[REDACTED]

From:

[REDACTED]

To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Bcc:

Subject: Athletic Training Licensure Board Elimination

Date: Tue Sep 05 2023 12:20:45 CDT

Attachments:

To whom it may concern,

I would like to raise my concerns about the state's consideration of eliminating the athletic training license. I understand this has been taken into consideration to lower costs and government oversight. While the state has cited that there have only been two complaints in five years as grounds for eliminating the need for the athletic training license, however, I believe that is evidence as to why the license is necessary. Requiring athletic trainers to be licensed has insured the only qualified and competent individuals are working with our youth. Governor Reynolds and other Iowa politicians and representatives have made it their goal is to "protect our youth", and this motion to eliminate the AT license would put student athletes at risk. I believe that the safety of our youth should not be put at risk as a means to make the bottom line.

Licensed athletic trainers complete continuing education that improve and refresh their skills. Just as we required nurses, doctors, and other medical professionals to complete continuing education, we should ensure that all athletic trainers are licensed and completing continuing education. We require coaches, teachers, substitutes, and other individuals who have direct contact with our youth to be licensed and complete continuing education. Allowing unlicensed athletic trainers to work with children would put the athletes' safety at risk.

I urge you not to eliminate the athletic training license.

Thank you,

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Board of Hearing Instrument Specialists
Date: Tue Sep 05 2023 12:20:50 CDT
Attachments:

Dear Boards and Commissions Review Committee members,

I write to you today, as a licensed hearing aid specialist who provides hearing healthcare services to an increasingly growing population, to express my concern with the Boards and Commissions Review Committee Subcommittee's August 29, 2023, recommendation to eliminate the Board of Hearing Aid Specialists (herein referred to as "the Board").

The elimination of this Board will result in the unintended consequence of:

- * Limiting/ lowering hearing healthcare access which is already an underserved population;
- * Loss of licensure;
- * Eliminating consumer protection;
- * Compromised patient safety;
- * Individual complacency due to lack of CE standards;
- * Reducing competition; and
- * Laxed hearing healthcare industry standards effecting patient outcomes.

This is because this Board – consisting of hearing healthcare industry experts- evaluates an individual’s application for licensure and issues a license if the individual meets statutory, regulatory, and board requirements. Additionally, the Board promulgates regulations to ensure consumer protections from fraud and abuse and educational standards that aligned with current practices to best serve Iowa’s hearing-impaired citizens. Furthermore, this Board investigates complaints about unprofessional conduct.

The proposed elimination of the Board would effectively force Iowans to seek hearing care from unregulated providers, many of whom should be expected to be unqualified to identify potential underlying health conditions or be online hearing aid companies that employ unscrupulous tactics to prey on consumers that need the help of a regulated medical profession such as hearing aid specialists.

Eliminating this Board may be interpreted by the U.S. Food and Drug Administration (FDA) as eliminating the ability of licensed hearing aid specialists to order the use of prescription hearing aids. Late 2022, the FDA issued regulations recategorized “traditional hearing aids,” which have been dispensed by licensed hearing aid specialists for decades, as “prescription medical devices,” which must be “prescribed or ordered the use of” by a licensed hearing care professional; 21 C.F.R. § 801.109. Prescription hearing aids require a written or oral authorization from a practitioner licensed by law to administer the device (C.F.R. §801.109).

It is for these reasons that it is paramount that Iowa maintains the Board of Hearing Aid Specialists.

Thank you for your attention to my concerns with the proposed elimination of the Board of Hearing Aid Specialists and I respectfully ask for your consideration. Please feel free to contact me if you would like to discuss this issue further.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc: [REDACTED]
Bcc:
Subject: IATS, Board of Athletic Training/Licensure Support
Date: Tue Sep 05 2023 12:22:28 CDT
Attachments: IATS Letter of Support.pdf

Good afternoon!

Attached, please find my letter of support attached to this email. Please let me know if you have any questions.

Thanks, [REDACTED]

[REDACTED]
Membership Director, Illinois Athletic Trainers Association

Owner:

[REDACTED]

Filename: IATS Letter of Support.pdf

Last Modified: Tue Sep 05 12:22:28 CDT 2023



September 5, 2023

To whom it may concern.

Please accept this letter in support of the Iowa Athletic Trainers' Society and the need to maintain the Board of Athletic Training and Licensure.

Athletic trainers, ATs, are highly qualified, multi-skilled healthcare professionals who render service or treatment, under the direction of or in collaboration with a physician, in accordance with their education, training, and the state's statutes, rules, and regulations. As a part of the health care team, services provided by athletic trainers include primary care, injury and illness prevention, wellness promotion and education, emergent care, examination and clinical diagnosis, therapeutic intervention, and rehabilitation of injuries and medical conditions. Athletic trainers must obtain an advanced degree from an Accredited Institution with very specific coursework and hundreds of hours of clinical training to become eligible for Board of Certification testing at a national level. The BOC testing allows the athletic trainer to become credentialed to practice from a national perspective. Therefore, Iowa must maintain Licensure and the Board of Athletic Training to guide the scope of practice/practice act, vetting of applicants or current licenses, as well as be responsible for adhering to and maintaining educational competency.

Key items to consider in support include:

- Iowa currently has 1,129 ATs who are licensed and countless students who rely on licensing.
- That licensure protects the public and lets clients and employers easily know an AT is properly trained, taking continuing education, and monitored.
- The Board helps provide the scope of practice guidance and protects the public from untrained persons.
- There is no expense associated with the Board of Athletic Training. The fees that ATs pay to renew their license cover all costs. They are cost-effective and are consistently in the black each year.
- Every state and Washington D.C. require licensure for ATs, except for Hawaii (which requires registration) and California (which has pending legislation).
- Athletic trainers are healthcare professionals who specialize in the prevention, diagnosis and intervention of emergent, acute, and chronic medical conditions involving impairment, functional limitations, and disabilities.
- Athletic trainers provide medical services to all types of patients. Across the United States, in addition to practicing in traditional sports team settings, athletic trainers work in performing arts, public safety, occupational health, and with the armed forces.
- Licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for healthcare professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied healthcare profession.
- Eliminating licensure in Iowa could potentially impact an AT's ability to practice across state lines (travel with their team), depending on regulatory requirements in other states. (ex. some states allow you to practice in their state temporarily, provided your home state maintains the same regulatory requirements).

I commend your efforts to review, streamline, and address inefficient Boards. The Board of Athletic Training should not be considered due to the protections and implications addressed above.

Please feel free to contact me if you have any questions. Thanks for the time to review this letter and consider the supporting documentation.

Sincerely,

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Boards & Commissions Review Comments
Date: Tue Sep 05 2023 12:30:45 CDT
Attachments:

Good afternoon,
I am a licensed psychologist and health service provider in Mount Vernon.

I am writing to strongly oppose the merging of the boards of Psychology, Social work, and Behavioral Health. The professionals represented under these areas are related, but distinct. Also, new guidelines in Iowa do not allow psychologists to supervise the other professions for clinical licensure, as we have in the past. It is not appropriate for one board to oversee us all, as we do different things. If the state will not allow more advanced practitioners to supervise other related areas, we certainly should not all be governed by members of these different areas, each without the others' expertise.

I must also oppose the removal of gender balances. This is an important way to help bring different experiences to the table and make sure all Iowa professionals are well represented.

These are my areas of greatest expertise and experience, but many of the other suggested changes are alarming and will result in a poorer working and living environment for Iowans. To have professionals from other areas creating and enforcing rules on different professionals as well as the negative effects that may have on the Iowans we serve, will greatly impact the lives and jobs of many in Iowa. Please slow down this process and seek input from the current Boards and have meaningful time for deliberation before cutting and merging nearly half of our current state Boards.

Sincerely,
[REDACTED]

--

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Merger of Iowa Chiropractic Licensure Board
Date: Tue Sep 05 2023 12:31:16 CDT
Attachments:

Good afternoon, my name is [REDACTED]. I am a local Chiropractor in Waukee. I have been a Chiropractor since October 2005. I am also a Past-President of the Iowa Chiropractic Society. I am writing this letter in regards to the possibility of combining the Chiropractic Licensure Board with the Physical Therapy, Occupational, and Massage therapy boards. After looking into this, there are some aspects about this that are of great concern. I have listed them below.

- * This creates a safety issue by combining and diluting the expertise of knowledge on the board to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions.
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you so much for your time to look into this matter. If you have any follow up questions, please reach out to me.

[REDACTED]

--

"You never know how far reaching something you think, say or do today will affect the lives of millions tomorrow" -BJ Palmer

[REDACTED]

"Like" [REDACTED] ss on Facebook or leave a review on FB or Google! We Thank You!

This e-mail and any attachments are intended only for the individual or company to which it is addressed and may contain information which is privileged, confidential and prohibited from disclosure or unauthorized use under applicable law. If you are not the intended recipient of this e-mail, you are hereby notified that any use, dissemination, or copying of this e-mail or the information contained in this e-mail is strictly prohibited by the sender. If you have received this transmission in error, please return the material received to the sender and delete all copies from your system.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: University of Iowa volleyball supports the Board of Athletic Training
Date: Tue Sep 05 2023 12:38:17 CDT
Attachments: image001.jpg

To whom it may concern,

Our volleyball program and all of athletics at the University of Iowa fully support the maintaining the Board of Athletic Training. They serve our players in critical areas at home and on the road. We could not operate without them.

The service they provide to our athletes physically as well as mentally is absolutely needed. Our players depend on them.

Thank you,

Owner:

[REDACTED]

Filename: image001.jpg

Last Modified: Tue Sep 05 12:38:17 CDT 2023

image001.jpg for Printed Item: 49

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Protection of the Board of Athletic Training
Date: Tue Sep 05 2023 12:42:06 CDT
Attachments:

Good morning,

I am reaching out in regards to the proposed changes to committees/boards in our state and particularly the recommended elimination of the Board of Athletic Training. Athletic trainers are healthcare professionals who specialize in the prevention, diagnosis and intervention of emergent, acute and chronic medical conditions involving impairment, functional limitations and disabilities. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession. Licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for health care professions. Licensure protects the public and lets clients and employers easily know an AT is properly trained, taking continuing education, and monitored. The Board helps provide scope of practice guidance and protects the public from untrained persons. There is no expense associated with the Board of Athletic Training; the fees that ATs pay to renew their license cover all costs.

Every state, plus Washington D.C., requires licensure for ATs, except for Hawaii (which requires registration) and California (who has pending legislation). Therefore, removing the Board of Athletic Training in the state of Iowa would be a step BACKWARDS.

As a parent, educator, and proud resident of the state of Iowa, the potential loss of this board is horrifying.

The elimination of our board would be tragic and devastating to the protection of athletes and patients in the state of Iowa. I plead that the elimination of the Board of Athletic Training is reconsidered.

Best regards,



From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Licensing Board for Athletic Trainers
Date: Tue Sep 05 2023 12:42:21 CDT
Attachments:

Good afternoon,

I'm reaching out in support of our Athletic Trainer, [REDACTED] and his concerns on the decision to eliminate the Licensing Board for Athletic Trainers in the State of Iowa.

Based on my discussion with Logan, I believe it is not in the best interest of our kids to eliminate this Board. We are lucky for a school our size to have an Athletic Trainer like Logan who is supported by this licensing board. As our Activities Director, I never question the decisions Logan makes related to our student injuries and injury prevention. This board supports Logan as well as ensures that Logan is properly licensed to serve our students in the State of Iowa. My worry is not for us, because I know we are in good hands with Logan, but for the other schools who desperately need AT's and I worry that without this Licensing Board, we will see people entering the field who are not qualified to meet the needs of our student-athletes.

Thank you for your time and consideration in this matter.

--

[REDACTED]

CONFIDENTIALITY NOTICE: This email and any attachments are covered by the Electronic Communications Privacy Act, 18 U.S.C. §§2510-2521 and contain privileged and confidential information intended only for the use of the individual or entity named. If you are not the intended recipient, you are hereby notified that you should not review, use, disclose, distribute, copy or forward this email. If you have received this email in error, please notify the sender immediately and delete/destroy any and all copies of the original message.

NOTIFICATION OF NON-DISCRIMINATION: The [REDACTED] strict offers career and technical programs in the following service areas: agricultural education, business education, family and consumer sciences education, and industrial education. It is the policy of

the [REDACTED] not to discriminate on the basis of race, color, national origin, sex, disability, religion, creed, age (for employment), marital status (for programs), sexual orientation, gender identity and socioeconomic status (for programs) in its educational programs and its employment practices. There is a grievance procedure for processing complaints of discrimination. If you have questions or a grievance related to this policy please contact the district's [REDACTED] [REDACTED] org; or the Iowa Civil Rights Commission, Grimes State Office Building, Des Moines, IA, 50319-0201, (515) 281-4121; or the U.S. Department of Education, Office for Civil Rights, 500 West Madison Street, Suite 1475, Chicago, IL 60661.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: AT board removal
Date: Tue Sep 05 2023 12:46:45 CDT
Attachments:

To whom it may concern,

Hello, my name is [REDACTED] and I am currently a Masters student at the University of Iowa in their Athletic Training program. I am emailing today because of the potential to remove the AT board and get rid of their licensure. First off, this board costs the state of Iowa absolutely no money so if budget cuts are prompting this removal you won't see any less in budget. Second, we have 1,100 members and are only growing due to the constant need of athletic trainers. After all, you can't have sports without an AT and you can't have safe sports without a competent, properly educated, and licensed athletic trainer. We are not only recognized as allied health care providers but we are some of the only health care personnel that some of our athletes have access to. There is no way I would stay in Iowa to practice as an athletic trainer if we do not have licensure, and I guarantee you will have a drop off of AT's in Iowa for that same reason. AT's are trained in many things and one of those being emergency care. There is no better representation of this than what happened to Demar Hamlin last NFL season. It is said he was in the safest place possible for that to happen as that is exactly what we are trained for. Now imagine a high school athlete in Iowa having that same incident happen, only this time they aren't as lucky because either there is no athletic trainer there due to the lack of licensure in Iowa or an untrained person is there who calls themselves and athletic trainer but doesn't have the Masters level of education that is truly needed. Help protect the kids, teenagers, and adults in Iowa and keep the board of AT and our licensure.

Thank you for your time

Sincerely,

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc: david.jacoby@legis.iowa.gov
<david.jacoby@legis.iowa.gov>; zach.wahls@legis.iowa.gov
<zach.wahls@legis.iowa.gov>
Bcc:
Subject: Iowa Senate File 514
Date: Tue Sep 05 2023 12:46:48 CDT
Attachments: image001.png

I am not in favor of dissolving the board of athletic training.

My mentors worked hard on creating licensure in the state.

The reasons are as valid now as they were then.

Ensures title protection, a minimum standard, and public protection.

My licensure fee is minimal.

I would agree to an increase in that fee (up to a doubling) if it meant the continuation of the Board.

Further, I have not seen a rationale for these changes. What will the "savings" be used for? If state revenues are a concern why did we just recently reduce property taxes?

This just seems a ploy, a poorly considered one, to shrink the size of state government. My opinion is the governor is primarily motivated by trying to burnish her conservative bonafides as she plies for more power within the GOP. Unfortunately, she is not alone and so Iowa seems truly in a race to the bottom against the likes of FL, TX, VA.

Pretty depressing thought coming off a 3 day weekend. ☹

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Owner:

[REDACTED]

Filename: image001.png

Last Modified: Tue Sep 05 12:46:48 CDT 2023

image001.png for Printed Item
501 (Attachment 1 of 1)

Page 844 of 1221

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic Training Board Public Comment Submission
Date: Tue Sep 05 2023 12:48:46 CDT
Attachments: Bengtson Letter_ATLicensureBoard.docx
Outlook-Buena Vist.png

Please accept the attached letter for public records for the public comment period in regard to the Athletic Training Licensure Board.

Thank you,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Owner:

[REDACTED]

Filename:

[REDACTED] Letter_ATLicensureBoard.docx

Last Modified:

Tue Sep 05 12:48:46 CDT 2023

September 5th, 2023

Dear Boards and Commissions Review Committee Members,

As an Athletic Trainer in the state, that has been practicing for more than 15 years, and an educator at the higher education level, which is working with students seeking to go into healthcare, specifically Athletic Training, I cannot stress the importance of maintaining the regulatory body to insure the protection of active individuals in the state of Iowa. Having Athletic Trainers licensed in the state, which is the standard for healthcare professionals nationwide, ensures that all those practicing as Athletic Trainers are qualified healthcare providers that all active individuals deserve.

Reducing or eliminating the regulation of licensure for Athletic Trainers will lead to the revision of Athletic Training practices in our state and place patients, especially young athletes, at risk. The first state to pass a licensure act was Texas over forty years ago. Iowa was not far behind and was at the forefront of providing regulation and maintaining standards for Athletic Trainers in 1994. Back then the state of Iowa indicated that the protection of the health, safety, and welfare of the public was a priority, and that same standard should be maintained as the rest of the country moves towards Athletic Training licensure requirements. Recently, South Carolina and New York passed bills requiring Athletic Training licensure in their states, leaving California as the only state remaining to have any regulation for Athletic Training practice. However, California currently has an active bill in their current legislative session to become the 50th state to require some form of regulation. Thus, Iowa should not be moving backwards in requirements for Athletic Training practices and should maintain the standard we set 29 years ago.

Athletic training is a healthcare profession in which we Athletic Trainers are responsible for the health and wellbeing of active individuals. One must obtain an advanced degree from an Accredited Institution with very specific coursework and hundreds of hours of clinical training in order to become eligible to take the National Board Certification Exam. We have national regulations via this board exam to initially become credentialed to practice, but as you know within healthcare, it is ultimately the State that is responsible for the directive and maintenance of educational competency through Licensure and Board regulation. Athletic Trainers must have a standard of practice and system of vetting applicants or current licensees, or our state will be heading to the unregulated unpredictability putting the public at risk.

As I mentioned previously, I work with many undergraduate students as they work on attending graduate school to become Athletic Trainers, and the elimination of the Athletic Training licensure may reduce the willingness of these students to either attend graduate school in the state or remain in the state to practice, which would put healthcare for active individuals at risk, especially in the many rural areas in our state. Additionally, it may also lead to currently licensed Athletic Trainers leaving the state to go practice where they know that their state is maintaining healthcare standards and regulation. We are already experiencing difficulties hiring Athletic Trainers across the state, this would increase that struggle significantly.

I fully understand and am in support of streamlining and developing efficiency within government, and the efforts for the Boards and Commissions Review are no easy task, but the complete elimination for a healthcare professional board and the associated licensure for a profession that provides healthcare to the athletes, and all active individuals, in the state cannot be part of this.

Therefore, I implore you to reconsider the recommendation to eliminate the Board for Athletic Training Licensure and the associated requirement for licensure of Athletic Trainers in the state of Iowa. Maintaining this board, in some capacity, is vital for the health, wellbeing, and safety of the citizens of Iowa.

Respectfully,

[Redacted signature]

U

[Redacted line]

[Redacted block]

Owner:

[REDACTED]

[REDACTED]

Filename: Outlook-Buena Vist.png

Last Modified: Tue Sep 05 12:48:46 CDT 2023



Outlook-Buena Vista.png f

Printed Item V5081(a

850 Attachment 2 of 2)

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic Trainers Board
Date: Tue Sep 05 2023 12:49:34 CDT
Attachments:

Reasons to leave the AT Board in tact:

- * There are over 1,100 licensed athletic trainers in the state of Iowa.
- * The renewal fees that ATs pay fully funds the AT Board and is not a cost to the state.
- * The AT license protects the health, safety, and welfare of the public by ensuring that the ATs in the state are the qualified healthcare providers that athletes in Iowa deserve.
- * The AT Board evaluates our scope of practice and adapts that based on the rapidly changing world of healthcare. If the Board is eliminated, other healthcare providers will have influence over our scope of practice.
- * Other states, like South Carolina moved towards licensure. Thus 49/50 states have regulation. This action would make Iowa, like California, not requiring licensure for ATs.
- * The elimination of AT licensure may reduce the willingness of graduating students to stay in the state. It may also lead to currently licensed ATs leaving the state. We are already experiencing difficulty hiring ATs across the state, this would just increase the struggle, specifically in rural schools.
- * ATs appear in the Iowa Code as licensed healthcare providers, specifically in the recent concussion law that was signed, declaring ATs as licensed healthcare providers

Please take these highlighted areas seriously as you make your decisions for the welfare of our youth!

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Possible Elimination of Iowa Board of Athletic Training and Licensure of Iowa Athletic Trainers
Date: Tue Sep 05 2023 12:51:11 CDT
Attachments:

To whom it may concern,

I am [REDACTED], an athletic training student in the MSAT program at the University of Iowa. I am expressing my opposition to the proposition to eliminate the Iowa Board of Athletic Training and licensure of Iowa athletic trainers.

Forty seven out of the fifty states require licensure of practicing athletic trainers. The remaining three states, including California, are moving towards requiring licensure of practicing athletic trainers. Athletic training is an allied health care profession that includes prevention, diagnosis, and intervention of emergent, acute, and chronic medical conditions involving impairment, functional limitations, and disabilities. Licensure is the standard form of regulation for all health care professions and aids in ensuring public safety. Athletic training practice without licensure poses a threat to public safety. Unlicensed individuals may do more harm than good, and in severe cases this can lead to death or permanent, life-altering damage. As an athletic training student and future athletic trainer, I would not have chosen to pursue my education or career in a state where athletic trainers are not licensed or governed by a Board of Athletic Training.

Additionally, the Iowa Board of Athletic Training does not cost the state of Iowa anything. The Iowa athletic training licensure fee covers all cost related to the activity of the board. Elimination of the Board of Athletic Training does not save the state of Iowa any money and does a great disservice to the career of athletic training in Iowa as well as the population that is served.

Overall, the elimination of the Iowa Board of Athletic Training and requirement of licensure of Iowa athletic trainers is deeply harmful to the career of athletic training in the state of Iowa. Athletic training students, Iowa athletic trainers, athletic training associations and societies from other states, and many other individuals impacted by this decision have voiced their opposition. Please listen to our voices.

Thank you for your time and consideration,

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Eliminating the athletic trainer's licensure board.
Date: Tue Sep 05 2023 12:52:54 CDT
Attachments:

As a coach of multiple sports in a small school I've seen first hand what a godsend good athletic trainers are doing for the student athletes in our high schools. Before our school had athletic trainers at our disposal as coaches we used to have to try to diagnose, treat and do follow up care for our athletes while trying to coach at the same time. All while not having the extensive training that our athletic trainers have. I ask you "what is in our kids best interest?" We want them to participate, do it safely at all levels & have the best possible care they can if needed. Let's not put this at risk across the state. In our case we have a great working relationship with Compass Memorial Hospital who helps provide quality athletic trainers to the area schools. Please do not make a decision that can have a negative affect on so many young people across this state. These athletic trainers need your support for all they do for the young people in our schools.

[REDACTED]

Sent from my iPhone

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: DSCI and Interpreter Licensure Board
Date: Tue Sep 05 2023 12:59:08 CDT
Attachments:

Hi, my name is [REDACTED]
I'm reaching out in regard to the DSCI and Interpreter Licensure Board. Deaf lowans of all ages, from birth to our seniors and everyone in between, need access to the services DSCI provides. We need help with various services such as education, training, employment, and more. We need the Interpreter Licensure Board to be strong to uphold the integrity and skill of interpreters who serve the Deaf population. The number of Deaf and hard-of-hearing people in Iowa is vastly greater than the number of Blind lowans, yet the services they are provided are disproportionate to the numbers. Deaf lowans should be able to keep our services, similar to how Blind lowans' services are protected. Please keep the Commissions/Boards that affect the Deaf/Hard of Hearing community intact.

Thank you so much for listening.

[REDACTED]o

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Boards and commissions
Date: Tue Sep 05 2023 13:12:17 CDT
Attachments:

My name is [REDACTED], and I currently serve as the Business Manager and Financial Secretary for the International Brotherhood of Electrical Workers Local 13. It is with very little knowledge of what the plan is for the Boards and Commissions that I write this response. This is not for a lack of effort on my part, but rather an attempt by a few in the State of Iowa to limit the voice of may lowans. All Boards and Commissions are very important as they bring a wide variety of subject matter experts voices into the decision making process, everyday lowans having a voice in how the Government works.

I am very concerned about the Iowa Electrical Examining Board being merged or consolidated with any other mechanical or professional board or commission. The Iowa Electrical Examining Board was previously under the State Fire Marshall's office for a reason. There can be nothing good that comes from having anyone not intimately familiar with the electrical construction and maintenance industry making decisions for the industry and the qualifications needed.

I am also concerned about the State and Local Workforce Development Boards. I have served on our Local Workforce Development Board as a Labor/Registered Apprenticeship representative for around eight years. During this time, we have seen the State finally figure out how to become compliant with the Workforce Innovation and Opportunity Act. Local Workforce Development Boards have many functions including strategic planning, operational alignment and service delivery design, and driving local economic growth through training and providing opportunity for any lowan who requires the services we offer to help them obtain and retain employment. This is and must remain a local area driven approach, with local stakeholders setting priorities. Again, if there were more information released regarding the committees plan for these boards, we may even be able to call out specific federal regulations that prohibit the State from taking these actions on these boards.

Thank you for your time, and I look forward to seeing the committees report to the Governor on September 30th. Hopefully, it will include a glimpse of what the committees plan going forward might look like.

Respectfully,

[REDACTED]

[REDACTED]

[REDACTED]

Scanned by Fortimail.

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc: Jessica Reinert <jreinert@aiaiowa.org>
Bcc:
Subject: Speaking request, Boards and Commissions Review Committee
Date: Tue Sep 05 2023 13:13:48 CDT
Attachments:

Boards and Commissions Review Committee,

I would like to speak during the public comment period. I am an architect and Iowa resident. I will be representing the American Institute of Architects, Iowa Chapter.

My comment will pertain to the Architecture Examining Board, the boards recommended to be consolidated, reorganized, or eliminated with the AEB, as well as other boards that oversee the professions that design Iowa's buildings and landscapes that affect the public's health, safety, and welfare.

If you require any additional information from me, please let me know.

Best, Matthew

[REDACTED]

From:

[Redacted]

To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Bcc:

Subject: Athletic Trainer Licensure

Date: Tue Sep 05 2023 13:16:24 CDT

Attachments:

Please support keeping licensure as part of the athletic trainer profession in Iowa. Getting rid of licensure would have a negative impact on a vital profession involved in Iowa inter scholastic athletics.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Board of Athletic Training
Date: Tue Sep 05 2023 13:20:59 CDT
Attachments: image001.jpg
image006.jpg
image007.png

To Whom It May Concern:

We are very fortunate at Shenandoah Medical Center to employ a Certified Athletic Trainer at our facility that helps to serve many local athletes in multiple communities in Southwest Iowa. Athletic trainers are highly qualified healthcare professionals tasked with providing care to a specific population under the direction of, or in collaboration with a physician in accordance with their training and state statutes. As part of the healthcare team, athletic trainers provide a range of services including injury prevention, wellness promotion and education, emergency care, examination and diagnosis of injuries, and therapeutic rehabilitation of injuries. An athletic trainer is often on the first line in a patient's healthcare journey following an injury and can be essential in the guidance of treatment and recovery. As evidenced by recent events in professional sports, athletic trainers legitimately save lives. Athletic trainers are required to graduate from an accredited program where they receive proper training and must pass a national board examination to be considered for certification. Likewise, athletic trainers must stay up to date on evidence-based medicine and complete fifty continuing education units every two years. Athletic trainers are often confused with personal trainers. There is, however, a large difference in the education, skillset, job duties, clientele, and regulation of the two professions.

Athletic trainers are licensed or otherwise regulated in 49 states and the District of Columbia. Licensure protects the public and gives peace of mind to patients, parents, and employers who know athletic trainers are properly trained, taking continuing education, and are monitored by the state. The Board of Athletic Training provides scope of practice guidance and protects the public from untrained individuals. Reducing or eliminating the Iowa Board of Athletic Training will result in a climate where literally anyone could serve as an "Athletic Trainer". Eliminating licensure in Iowa could also potentially impact an athletic trainer's ability to practice across state lines when traveling with athletic teams. This is of particular importance in our region of the state where it is common for the schools we serve to compete in Nebraska and Missouri regularly.

The Iowa Board of Athletic Training is not an expense to the state. The fees athletic trainers pay cover all costs related to the regulation of our profession. The effort to eliminate the Iowa Board of Athletic Training seems to be driven by a lack of education and understanding of its importance. I would encourage the Board of Commissions to keep the Board of Athletic Training intact for all of the patients they serve in Iowa.

Thank you!

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Confidentiality Notice: The content of this message and any documents attached contain confidential information that is legally privileged. This information is intended only for the use of the individual or entity named above. The authorized recipient of this information is prohibited from disclosing this information to any other parties unless required to do so by law or regulation and is required to destroy the information after its stated need has been fulfilled.

If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, or action taken in reliance on the contents of this document is prohibited. If you have received this information in error, please notify the sender immediately and destroy these documents.

Owner:

[REDACTED]

Filename: image001.jpg

Last Modified: Tue Sep 05 13:20:59 CDT 2023



image001.jpg for Printed Item: 513 (Attachment 1 of 3)

Page 863 of 1221

Owner:

[REDACTED]

Filename: image006.jpg

Last Modified: Tue Sep 05 13:20:59 CDT 2023

image006.jpg for Print

Item: 513 (Attachment 2

**TOP
WORK
PLACES**

2021

Des Moines Register

Page 865 of 1221

Owner:

[REDACTED]

Filename: image007.png

Last Modified: Tue Sep 05 13:20:59 CDT 2023

**TOP
WORK
PLACES**

2022

Page 867 of 1221

image007.png for Print

Item: 513 (Attachment 3

Des Moines Register

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Iowa Chiropractic Licensure Board
Date: Tue Sep 05 2023 13:23:31 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions.
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]
[REDACTED]



From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Board of Licensure for Athletic Training
Date: Tue Sep 05 2023 13:24:01 CDT
Attachments:

Good morning and Happy Monday!

I hope this email finds you well. I recently was notified via the Iowa Athletic Trainers' Society (IATS) that it has been recommended to eliminate the Board of Athletic Training. This is such a setback for the profession and for the state of Iowa. I have been a licensed and certified athletic trainer in the state of Iowa since 2013. Having a license is critical for student-athletes and for any and all patients being treated by an athletic trainer.

To think that the state would take something away that protects the public and lets all clients/patients and employers know that an athletic trainer is properly trained, that they have done their continuing education and they we are monitored is ludacris.

Recently in the news, an NFL player went down and who was there to perform life saving measures, an ATHLETIC TRAINER. It's time for the state of Iowa to support athletic trainers and what they do in the health care environment.

Athletic training encompasses the prevention, examination, diagnosis, treatment and rehabilitation of emergent, acute or chronic injuries and medical conditions. Athletic training is recognized by the American Medical Association (AMA), Health Resources Services Administration (HRSA) and the Department of Health and Human Services (HHS) as an allied health care profession.

Athletic trainers (ATs) are highly qualified, multi-skilled health care professionals who render service or treatment, under the direction of or in collaboration with a physician, in accordance with their education, training and the state's statutes, rules and regulations. As a part of the health care team, services provided by athletic trainers include primary care, injury and illness

prevention, wellness promotion and education, emergent care, examination and clinical diagnosis, therapeutic intervention and rehabilitation of injuries and medical conditions. The NATA Code of Ethics states the principles of ethical behavior that should be followed in the practice of athletic training.

I implore you to vote against this recommendation. I would love for you to come and speak with our staff at William Penn University should you have any questions.

Thank you,

[Redacted signature]

[Redacted contact information]

Get Outlook for iOS

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Comment regarding proposal to eliminate Athletic Training Licensure Board
Date: Tue Sep 05 2023 13:26:25 CDT
Attachments:

Hello and thank you for allowing the public to comment on this proposal within the legislature in Iowa.

Licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for health care professions. Athletic Trainers are included under the allied health professions category as defined by the U.S. Department of Health and Human Services (HHS) and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession. I am currently a Certified Athletic Trainer (License [REDACTED]) beginning my 30th year of clinical practice within the state of Iowa. I work at Iowa State University where I am a Clinical Associate Professor and the Athletic Training Program Director. I was the volleyball athletic trainer at Iowa State for 23 years providing health care to hundreds of athletes. I also have covered the Iowa High School State wrestling tournament, the Iowa Special Olympics, high school events, Drake Relays, and AAU Junior Olympics, among many other events over my career. I also have four children who were active in middle school, high school, and club sports. Having taught future athletic trainers, practiced as an athletic trainer, advised students, and mentored hundreds of individuals in a variety of settings, I feel I have a pretty good grasp of the athletic training profession. Athletic Trainers are healthcare professionals who specialize in the prevention, diagnosis and intervention of emergent, acute and chronic medical conditions involving impairment, functional limitations and disabilities. Athletic Trainers are educated in emergency action plans, emergency situations that may occur in practices and games, are Basic Life Support certified in CPR/AED, trained in assessing and monitoring concussions, make return to play decisions utilizing the latest evidence based research, are required to maintain continuing education requirements, and often they obtain additional professional credentials.

I have earned a bachelor's degree, a master's degree, and a PhD and currently all athletic training students must be enrolled in a Professional Master's degree program accredited by CAATE (Commission on Accreditation of Athletic Training Education) to ensure quality and appropriate educational and clinical Standards within the academic program. There are currently 1,129 athletic trainers licensed in the state of Iowa along with countless athletic training students seeking a Master's degree in Athletic Training. As a parent, it is CRITICAL knowing who is providing care to my kids who participate, what the level of education for that

individual is, that they passed the Board of Certification examination, AND they are licensed to practice as an Athletic Trainer in the state. If we do away with licensure in the state of Iowa, any individual can call themselves an Athletic Trainer or practice the skills of an athletic trainer which is frightening on so many levels.

There is NO expense to operating the Board of Athletic Training in Iowa as the fees that Athletic Trainers pay to renew their license cover all costs. They are cost-effective and are consistently in the black each year.

Though a thorough review of all Boards within the State of Iowa is necessary and I am sure the committee did its due diligence in taking a review, however, I must vehemently oppose the elimination of the Board of Athletic Training Licensure. This is a SAFETY measure and helps protect the public to ensure those who are taking care of our children and those who participate in active endeavors have the proper training, are taking continuing education, and monitored.

Sincerely,

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted] edu

[Redacted]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc: [REDACTED]
Bcc:
Subject: Support Continuation of Iowa Board of Athletic Trainers
Date: Tue Sep 05 2023 13:28:24 CDT
Attachments: BOC Letter_20230905.pdf
image001.png

Dear Members of the Boards and Commissions Review Committee,

The Board of Certification appreciates the opportunity to comment on the committee's recommendations regarding the Iowa Board of Athletic Trainers. Please accept the attached letter that provides information supporting the continuation of the Iowa Board of Athletic Trainers. Thank you for your consideration.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

BOCATC.org

Owner:

[REDACTED]

Filename: BOC Letter_20230905.pdf

Last Modified: Tue Sep 05 13:28:24 CDT 2023



**BOARD OF CERTIFICATION
FOR THE ATHLETIC TRAINER**

1411 Harney Street, Suite 100 | Omaha, NE 68102
(402) 559-0091 office | (402) 561-0598 fax

BOCATC.org

September 5, 2023

Boards and Commissions Review Committee
Office of the Governor
Governor Kim Reynolds
Lt. Governor Adam Gregg

Email: BCRCcomments@iowa.gov

Re: Iowa Board of Athletic Trainers

Dear Committee Members,

The Board of Certification, Inc. (BOC) appreciates Iowa Governor, Kim Reynold's and the Boards and Commissions Review Committee's (Committee) desire to be more efficient and is writing to express our grave concern over the possible elimination of the Iowa Board of Athletic Trainers (IBAT).

Athletic Trainers (ATs) are health care professionals whose services comprise prevention, emergency care, clinical diagnosis, therapeutic intervention and rehabilitation of injuries and medical conditions. Licensure provides the highest level of patient protection for the public's safety and it is the standard form of regulation for health care professions. ATs are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services and are assigned National Provider Identifier numbers. The American Medical Association also recognizes athletic training as an allied health care profession. Eliminating the IBAT for these health care professionals puts their patients, including the many student-athletes served by ATs, at undue risk of harm.

Currently, Iowa consumers can be assured they are receiving competent athletic training services by a licensed professional as determined by the IBAT. The IBAT also allows the consumer to have an outlet for addressing any questionable practice and deters imposters from practicing athletic training. The IBAT provides Iowa ATs and their directing physicians guidance on scope of practice.

At this time, there is only one state that does not regulate ATs, California. It is unfortunate that California is a safe haven for those who have lost their athletic training license in another state. For example, an AT may lose their BOC certification and their license to practice in Indiana and move to California because that state does not regulate ATs. Should Iowa decide to no longer regulate ATs, there is nothing stopping uncertified, unlicensed ATs from moving to Iowa and continuing to practice athletic training – thereby putting patients at risk.

In fact, recent legislation in New York and South Carolina demonstrates the national trend is moving in the opposite direction to what Iowa is proposing. Both states passed legislation in 2023 that transitions from a state certification to state licensure.

The absence of regulation for ATs in Iowa has the potential for other unintended consequences, as well. As indicated, 49 states and the District of Columbia regulate ATs. Nearly all of these states have exemption laws that allow ATs traveling with a team out of state to practice without a license for a temporary period of time. However, states such as Alaska, Texas and Utah include in their exemption law that the AT must be regulated in their own state to qualify for the exemption. This creates a conundrum if, for example, an AT employed by the University of Iowa travels with their team to Utah. The University of Iowa AT, who is not regulated in Iowa under this proposed change, may be unable to lawfully practice in Utah, thereby potentially leaving student-athletes without legal health care services from their AT.

According to BOC statistics, there are currently 994 BOC Certified Athletic Trainers residing in Iowa and over 58,000 across the United States. In the name of consumer safety, it is the responsibility of each state to identify competent practitioners and an effective system to enforce the law. It is our hope that you will vote in opposition of eliminating the Iowa Board of Athletic Trainers. Please contact [REDACTED] if you have any questions,
[REDACTED].

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

Cc: Iowa Athletic Trainers' Society

The BOC was incorporated in 1989 as a not-for-profit credentialing agency to provide a certification program for the entry level athletic training profession. The BOC establishes both the standards for the practice of athletic training and the continuing education requirements for BOC Certified Athletic Trainers (ATs). The BOC also works with state regulatory agencies to provide credential information, professional conduct guidelines and regulatory standards on certification issues. The BOC is nationally accredited by the National Commission for Certifying Agencies.

Owner:

[REDACTED]

Filename: image001.png

Last Modified: Tue Sep 05 13:28:24 CDT 2023

221

image00

for Prin

Item: 5.

Aut

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Please Keep the Iowa Board of Athletic Training
Date: Tue Sep 05 2023 13:30:25 CDT
Attachments: image003.png

To whom it may concern,

I am a licensed athletic trainer writing with deep concern regarding the recent news from the Boards and Commissions Review Committee and the recommendation for the elimination of the Board of Athletic Training. This is not in the best interest of the public!

Please Consider the following:

- * Athletic trainers (ATs) are healthcare professionals who specialize in the prevention, diagnosis and intervention of emergent, acute and chronic medical conditions involving impairment, functional limitations and disabilities.
- * Would you want someone unqualified to care for your family member???
- * Licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.
- * Athletic trainers provide medical services to all types of patients in all kinds of settings. These range from traditional sports team settings, hospitals, clinics, to performing arts, public safety (police and fire rescue), occupational health, and with the armed forces.
- * In Iowa, we currently have 1,129 ATs who are licensed!

* As you know, licensure protects the public and lets clients and employers easily know an AT is properly trained!

* Would you want an unqualified “professional” caring for your family member? Please consider the importance of ATs and the vital work we do to help care for, rehabilitate, and prevent injuries and illnesses!

* If you are a sports fan, you may recall the incident with NFL/Buffalo Bills football player Demar Hamlin who suffered cardiac arrest on the field and was saved due to the actions of an athletic trainer!

* There is no expense associated with the Board of Athletic Training. The fees that ATs pay to renew their license cover all costs. They are cost-effective and are consistently in the black each year.

* Every state (except California who has pending legislation) and Washing D.C require licensure for ATs.

Thank you for your time and consideration on this matter. I would happily answer any further questions or concerns.

Sincerely,

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Please excuse any spelling or grammar errors. This message was sent from my iPhone.

Owner:

[REDACTED]

Filename: image003.png

Last Modified: Tue Sep 05 13:30:25 CDT 2023

image003.png for Printed Item: 523 (Attachment 1 of 1)



From: [REDACTED]
To: BCRCComments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Chiropractic board merging
Date: Tue Sep 05 2023 13:38:08 CDT
Attachments:

[REDACTED]

[REDACTED]

Dear Board and Commission Review Committee,

Re: Board merging

My name is [REDACTED], Chiropractor on Ingersoll Avenue in Des Moines, Iowa for 27 years. I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

*This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases

*This will tax volunteers who serve on these boards and will require additional meeting and hearings for different professions

*We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[Redacted]

[Redacted]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Re: Request to appear for public comment
Date: Tue Sep 05 2023 13:41:11 CDT
Attachments: Outlook-fj3robwx.png
Outlook-flfkiny4.png

Dear BCRC,

As President of the Iowa Athletic Training Society, representing over 1000 Athletic Trainers in the state, I would like to request a timeslot to speak to the Committee during the period of public comment on September 6th at 12 noon.

Thank you.

[REDACTED]

Iowa State University
1011 South Dakota Avenue
Ames, IA 50011
515-460-5828 (mobile)

Owner:

[REDACTED]

Filename: Outlook-fj3robwx.png

Last Modified: Tue Sep 05 13:41:11 CDT 2023



ATHLETIC TRAINING

Owner:

[REDACTED]

Filename: Outlook-flfkiny4.png

Last Modified: Tue Sep 05 13:41:11 CDT 2023



IATS

**IOWA
ATHLETIC
TRAINERS'
SOCIETY**

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Retain the Board of Athletic Training
Date: Tue Sep 05 2023 13:46:48 CDT
Attachments: Licensure Map.pdf

Hello,

I am currently a Master of Science in Athletic Training student at the University of Iowa. I am emailing today to advocate for the Board of Athletic Training and insist that the elimination of the board is taking a step in the wrong direction for the State of Iowa.

There are currently 47 states and the District of Columbia that require licensure for athletic trainers. Of the 3 remaining non-licensure states, New York has a licensure bill awaiting the Governor's signature and California has pending legislation (CA is the only state that does not regulate the AT profession--they have pending legislation that is currently a certification bill that they hope to have amended to licensure). (Hawaii, the third non-licensure state, only requires registration). Attached is a map for a visual.

As a future healthcare professional, I am required to obtain a bachelor's degree, a master's degree and pass the Board of Certification. My education is taken very seriously by both the University of Iowa MSAT program and myself, and the removal of the Board of Athletic Training is belittling to my fellow students and practicing athletic trainers in the State of Iowa. Licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for healthcare professions.

I hope the boards and commissions review committee recognize the importance of having licensed healthcare providers for the safety of all citizens within the state of Iowa. Please consider keeping the Board of Athletic Training to ensure qualified athletic trainers remain in Iowa.

Sincerely,

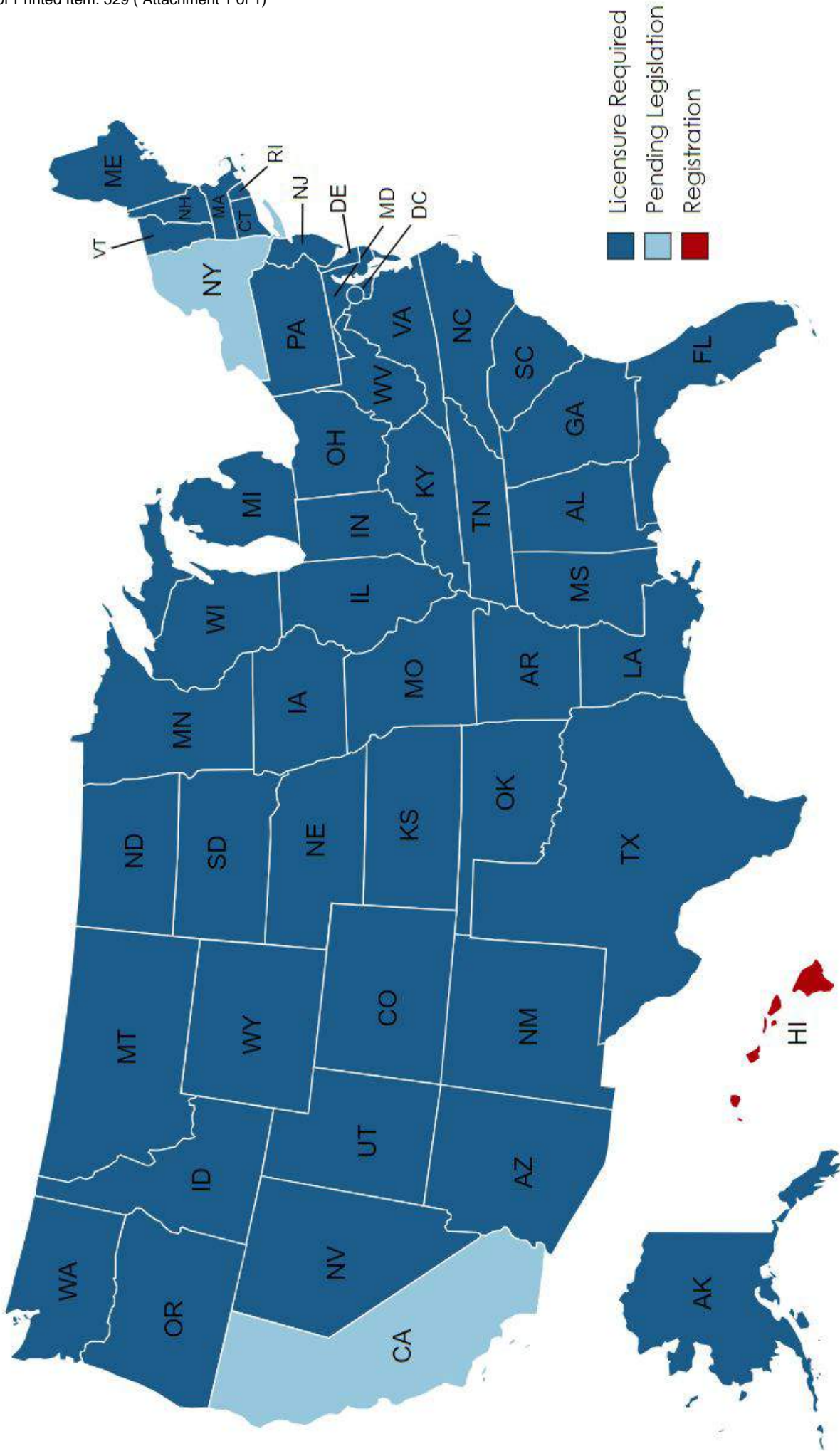
[REDACTED]
Master of Science in Athletic Training
University of Iowa 2025

Owner:

[REDACTED]

Filename: Licensure Map.pdf

Last Modified: Tue Sep 05 13:46:48 CDT 2023



From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: request to speak
Date: Tue Sep 05 2023 13:49:07 CDT
Attachments:

My name is [REDACTED] and I am currently the President-Elect of the Iowa Athletic Trainers Society and a Professor/Director of Athletic Training at Drake University. I am asking to speak on behalf of athletic trainers at the meeting to be held on September 6 regarding the changes to boards in this state, and in particular the elimination of the Board of Athletic Training.

Thanks,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>; dawn.driscoll@legis.iowa.gov
<dawn.driscoll@legis.iowa.gov>
Cc:
Bcc:
Subject: Athletic Training Licensure Board
Date: Tue Sep 05 2023 13:49:52 CDT
Attachments:

To Whom It May Concern,

I have become aware that there is discussion about eliminating the Athletic Training Licensure Board. I find it unsettling that in order to “keep kids safe” the government would want to eliminate the licensing board for the exact people that are keeping kids safe. Athletic trainers are highly educated medical professionals that have to complete 50 hours of continuing education every two years in order to maintain their certifications. They are trained and educated in sports injury prevent, management, and treatment. That includes concussions. No other medical professionals have concussion education like athletic trainers.

I am not comfortable allowing my children to participate in athletics if there is a random “medical professional” that is not state regulated on the side line. Nurses, EMT-Bs, physical therapists, etc are not athletic trainers. They do not have the same training as athletic trainers, thus should not be replacing them. This does not keep kids safe, it puts them in harms way.

Keep the Athletic Training Licensure Board in place,

[REDACTED] r

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Public Comment Regarding the Athletic Training Profession
Date: Tue Sep 05 2023 13:50:18 CDT
Attachments: image001.png
NATA Public Comment Athletic Trainers.pdf

Good afternoon.

Attached, please find a letter from NATA President [REDACTED]. Thank you in advance for your time.

[REDACTED]

Owner:

[REDACTED]

Filename: image001.png

Last Modified: Tue Sep 05 13:50:18 CDT 2023

image001.png for Printed Item: 533 (Attachment
2)



Page 900 of 1221

NATIONAL ATHLETIC TRAINERS ASSOCIATION
HEALTH CARE FOR LIFE & SPORT

Owner:

[REDACTED]

Filename:

NATA Public Comment Athletic Trainers.pdf

Last Modified:

Tue Sep 05 13:50:18 CDT 2023



September 1, 2023

Director Larry Johnson, Jr.
Iowa Department of Inspections and Appeals
321 East 12th Street
Des Moines, Iowa 50319-0083

Dear Director Johnson:

On behalf of the National Athletic Trainers' Association (NATA), I am writing in opposition to recommendations to disband the Iowa Athletic Training Board and eliminate licensure requirements for athletic trainers. Currently 47 states and the District of Columbia require a license to practice athletic training, with legislation pending in other non-licensure states.

NATA is a professional membership organization serving than 45,000 athletic trainers nationally, with more than 550 members in the state of Iowa. These individuals are highly skilled, health care professionals who specialize in the prevention, diagnosis and intervention of emergent, acute and chronic medical conditions involving impairment, functional limitations and disabilities. Entry into the profession requires a masters' degree from an accredited athletic training education program, of which 7 are located in Iowa. Athletic trainers provide medical services to a variety of patients. Across the United States, in addition to practicing in sports team settings, athletic trainers work in performing arts, public safety, occupational health, and with the armed forces. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS) and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.

Athletic trainers have one of the largest patient populations, many of which are children and young adults. Licensure provides the highest level of patient protection for public safety. It is the standard form of regulation for health care professions. The Iowa Board of Athletic Training plays a critical role in this process. The low number of complaints the Board adjudicates reflects their ability to prevent unqualified individuals from entering the profession, properly educating current licensees on standards of care, ensuring adherence to professional ethics, and conducting business in an efficient, cost-preventative manner.

Thank you in advance for your time. If you have any questions or need additional information, please contact

[REDACTED]
[REDACTED] rg.

Sincerely,

[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Fw: Public comment on Board of Athletic Training Elimination
Date: Tue Sep 05 2023 13:51:28 CDT
Attachments: Outlook-b2xrqtb2.png
Outlook-u11mebin.png

Dear Committee:

It has come to my attention that the recommendations from the Department of Inspections, Appeals and Licensure, more specifically the Committee of Boards and Commission Review recommends to eliminate Board of Athletic Training as well as the State Licensure of Athletic Training.

As the current President of the Iowa Athletic Training Society, representing over 1000 Athletic Trainers in our state, I cannot stress the importance of maintaining our regulating bodies in order to insure the protection of the Athletes in our State. Reducing or eliminating regulation will lead to the reversion of Athletic Training practice in our state to the previous climate of Athletic Training where literally anyone could serve as the "Athletic Trainer" at their place of employment as that employer saw fit.

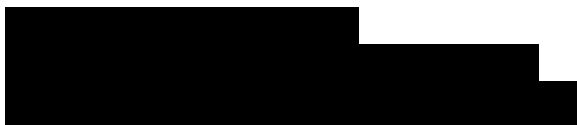
Athletic Training is a healthcare profession and we ATs are responsible for the health and wellbeing of a specific population. One must obtain an advanced degree from an Accredited Institution with very specific coursework and hundreds of hours of clinical training in order to become eligible for Board testing at a National level. We have national regulation via this national board exam to initially become credentialed to practice but, as you know in many other areas for professional organizations, it is the States that are ultimately responsible for the adherence to and maintenance of educational competency via Licensure and Board regulation. We must have a standard of practice and system of vetting applicants or current licensees, or we will be headed to the unregulated randomness as seen in, and only in, the State of California which does not regulate Athletic Training at the State level.

I fully understand the streamlining and reduction of governmental burden in some areas and that the task of the Boards and Commissions Review is great but reduction for a profession that provides healthcare to the athletes in the state (in many instances the youth) cannot be part of this. Additionally, this proposed reduction will not affect cost-saving measures as the Board of Athletic Training operates without funding from the State as the members are volunteers and they do meet virtually.

I beg for you to reconsider the potential to eliminate the regulation of Athletic Training and maintain our Licensure and Board as is, without modification. Perhaps a middle ground can be met if you disagree, but I would welcome further discussion on this matter and would be more than open to discussing it with the Committee.

Please feel free to contact me for further discussion as any assistance I could provide on our behalf to the Committee would be beneficial to those I represent as well as the athletes at all levels in the State of Iowa.

Sincerely,

A large black rectangular redaction box covering the signature area.

Iowa State University
1011 South Dakota Avenue
Ames, IA 50011
515-460-5828 (mobile)

Owner:

[REDACTED]

Filename: Outlook-b2xrqt2.png

Last Modified: Tue Sep 05 13:51:28 CDT 2023



IATS

**IOWA
ATHLETIC
TRAINERS'
SOCIETY**

Owner:

[REDACTED]

Filename: Outlook-u11mebin.png

Last Modified: Tue Sep 05 13:51:28 CDT 2023



ATHLETIC TRAINING

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: KEEP ATHLETIC TRAINING LICENSE
Date: Tue Sep 05 2023 13:55:19 CDT
Attachments:

To Whom It Concerns,

My children were in sports and now my grandchildren

THEY BENEFITED WITH HAVING A TRAINED, COMPETENT LICENSED ATHLETIC
TRAINER

KEEP THE LICENSE IN EFFECT SO OUR CHILDREN ARE TREATED WITH KNOWLEDGE
AND EXPERTISE

INSTEAD OF "SOMEONE WHO THINKS THEY KNOW INJURIES" AND COULD CAUSE
MORE HARM.

Sincerely,

[REDACTED]

From: Jon Weinrich
[REDACTED]

To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>; tom.shiple@legis.iowa.gov
<tom.shiple@legis.iowa.gov>; tom.moore@legis.iowa.gov
<tom.moore@legis.iowa.gov>

Cc:
Bcc:

Subject: Iowa Board of Athletic Training

Date: Tue Sep 05 2023 14:08:41 CDT

Attachments:

Hello,

I'm writing in support of the Iowa Board of Athletic Trainers and hoping you will reconsider the proposed elimination. Athletic Trainers are vital to schools when it comes to athletics and caring for their athletes. As with most professions, Athletic trainers are highly qualified healthcare professionals that come with very specific roles. We have been blessed to have a very qualified athletic trainer who helps with (among many things) injury prevention, emergency care, and concussion protocols. As we have seen very publicly within the last year, athletic trainers have literally saved lives right before our eyes. Eliminating the board of Athletic Training would result in many untrained and ill equipped individuals serving in roles directly putting our athletes at risk. I realize that you make difficult decisions everyday for the people in the State of Iowa. I hope that we continue to license and keep the best athletic trainers in our state to serve our students, schools, and community!

Thank you for your time!

Sincerely,

[REDACTED]

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic Training Licensure
Date: Tue Sep 05 2023 14:15:05 CDT
Attachments:

Good Afternoon,

My name is [REDACTED]. I am a Certified Athletic Trainer employed at Southeast Iowa Regional Medical Center in Burlington, IA. I work at the Fort Madison Orthopedic Clinic and cover athletic events for Burlington Notre Dame High School. I am writing to you today due to my concern with the potential elimination of Athletic Training Licensure in the state of Iowa.

Athletic trainers are extremely important piece within public health and safety. Athletic trainers have extensive background in injury prevention, management, treatment, and rehabilitation. Athletic trainers are trained to treat the whole athlete and are often the most trusted on the sport staff. Our job is to protect the athletes and ensure they have a safe space physically and mentally. Athletic trainers are also one of the most qualified health care professionals to treat concussions. Athletic Trainers are the first medical professional to be on the playing surface when an injury occurs. We are the ones who create Emergency Action Plans (EAPs) and implement them when an emergency may occur.

I would like to explain the educational background and requirements to become at ATC. One must obtain a masters degree from a CAATE accredited university which was changed for the graduating class of 2022 to sit for the Athletic Training Board of Certification. Once an athletic trainer passes their boards they must keep on required continuing education due ever 2 years. Increasing the level of education to a masters degree SHOULD be an immediate indication that this a complex, and important degree that only benefits our patients more.

Personally, I attended Iowa State University and earned a bachelors degree in 2021, as I was apart of the last bachelors class before requirement change. I obtained 2,500+ clinical hours over 3 years. I have worked all sports from the high school to the Division I level. I even had the wonderful opportunity to cover the State of Iowa Special Olympics for several years. Athletic Trainers are able to work with all types and levels of athletes. I absolutely love my job and current ability to treat the athletes.

It is is completely illogical from a public safety & assurance standpoint for the State of Iowa to eliminate the Athletic Training Licensure. It would not only put our athletes at risk, but it would potentially eliminate thousands of jobs in our great state. This change would open the door for anyone to render care as an "athletic trainer" without proof or regulations or qualifications. Can

you imagine unqualified people trying to care for Demar Hamlin?

Athletic Training routinely requires early mornings and late nights. We are highly educated and passionate about our profession that we have fought so hard for advocacy and respect. If the State of Iowa no longer requires a license, this would be a large step back in medical care and greatly endanger Iowa student and professional athletes.

Thank you for your time and please support to keep Certified Athletic Trainers on the sidelines to keep our athletes safe!

, ATC, LAT

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Iowa AT Licensure
Date: Tue Sep 05 2023 14:17:21 CDT
Attachments: image001.png

Hello,

My name is [REDACTED] and I am a BOC Certified Athletic Trainer as well as an Iowa Licensed Athletic Trainer. The news that Iowa is considering eliminating the Iowa Athletic Trainer License is very concerning. I am reaching out to comment on the proposed changes to committees/boards in our state and particularly the recommended elimination of the Board of Athletic Training. I cannot begin to state how alarming this is for the safety of athletes in this state. Athletic trainers play a vital role in the safety of young athletes playing sports in our state daily. The presence of athletic trainers allows coaches to coach and allows a licensed healthcare provider to prevent, evaluate, treat, and rehabilitate injuries. Additionally, if an emergency occurs, athletic trainers are present to provide the necessary immediate care and activate an emergency action plan/response. Finally, and more specifically, with concussion care being such an important and vital topic, having trained professionals who can diagnose and treat head injuries accurately and effectively is necessary for safe participation in sports.

47 states and the District of Columbia require Athletic Trainers to be licensed. Removing the licensure requirement would be detrimental to all athletic trainers in the state and would be a major step back for sports medicine in the state of Iowa. Athletic Trainers are health care professionals who specialize in the prevention, diagnosis and intervention of emergent, acute and chronic medical conditions involving impairment, functional limitations and disabilities. As an athletic trainer, I have a bachelor's degree in athletic training as well as a masters of science in athletic training. I am trained to handle emergent situations and provide the best care for the athletes that participate in Iowa. Athletic training licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.

If the licensing system for athletic trainers was removed, it would be up to the schools who are hiring athletic trainers determine the viability of an individual to be an athletic trainer. That means the schools and often athletic administrators or coaches who are not trained in healthcare will be charged with determining who is qualified to provide healthcare. While I have respect for athletic administrators and coaches, they are not the best individuals to hire a healthcare provider. Overall, this change hurts the public and makes participation in sport less

safe.

Thanks so much for reading this email!

Sincerely,

[Redacted]

[Redacted]

[Redacted]

Owner:

[REDACTED]

Filename: image001.png

Last Modified: Tue Sep 05 14:17:21 CDT 2023

image001.png for Printed Item: 542 (Attachment 1 of 1)



StandOut

Page 916 of 1221

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Hearing Instrument Specialist's Board
Date: Tue Sep 05 2023 14:20:59 CDT
Attachments:

To Whom It May Concern:

I am writing regarding the attempted abolishment of the Hearing Instrument Specialist's Board.

I am currently employed at a hearing clinic as an audio tech. I am starting my classes Thursday, September 7th for HIS. I have worked in the medical field since 2003 and I am very passionate about patients and treating their conditions.

If the HIS license is abolished, this would create a huge void for our patients and their care would be lessened greatly. Without providers, I would be unable to see the 15+ patients a day.

The HIS are licensed and are as responsible for the patients as a provider with a Aud license.

Please do not abolish the HIS board.

Thank you,

[REDACTED]

NOTICE: This e-mail is intended only for the addressed party and may contain information that is proprietary/confidential or otherwise protected. If you are not the named addressee, you are not authorized to view this message. If received in error, please contact the sender and delete the communication.

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Building Code Advisory Council Comments
Date: Tue Sep 05 2023 14:33:11 CDT
Attachments: Building Code Ad Council Comments Final.pdf
image001.png

Attached are my comments to the Boards and Commissions Review Committee.

Please let me know if you have any questions.

Thanks,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Visit us at www.elpc.org

[Blog](#) | [Facebook](#) | [Twitter](#) | [LinkedIn](#)

Owner:

[REDACTED]

Filename:

Building Code Ad Council Comments Final.pdf

Last Modified:

Tue Sep 05 14:33:11 CDT 2023



ENVIRONMENTAL LAW & POLICY CENTER

Protecting the Midwest's Environment and Natural Heritage

The Boards and Commissions Review Committee
Department of Management
State House
Des Moines, Iowa

September 5, 2023

The Building Code Advisory Council in Iowa, established under Iowa Code 103A.14, plays a crucial role in ensuring the safety, efficiency, and compliance of construction projects throughout the state. Passed in 1972, House File 6 established the state building code, provide for its administration, and provide for a penalty for violations of the code. The Council members are appointed by the Governor and are persons uniquely *qualified by experience or training to provide a broad or specialized expertise on matters pertaining to building construction (Code 103A.14)*.

Key points highlighting the importance of this council:

Safety: One of the primary functions of the Building Code Advisory Council is to promote building safety. They review and make recommendations regarding building codes and standards. Ensuring that buildings meet or exceed safety codes is essential to protect the lives and property of Iowa's residents.

Code Development: The council assists in the development and revision of building codes and standards. This ensures that Iowa's building codes remain up-to-date with the latest advancements in construction technology, materials, and safety practices.

Compliance: By providing guidance and interpretation of building codes, the council helps builders, architects, and engineers understand and adhere to the regulations. This promotes compliance with the law and helps avoid costly mistakes during construction.

Consistency: The council helps maintain consistency in building codes and regulations across Iowa. This consistency is essential for builders and developers who operate in multiple jurisdictions within the state, as it reduces confusion and streamlines the construction process.

Innovation: Through the advisory council, Iowa can incorporate innovative construction practices and materials that improve energy efficiency and sustainability. This can help reduce the environmental impact of buildings and lower long-term operational costs for property owners.

Public Input: The council often includes members of the public, such as homeowners and representatives from various industries. This inclusion allows for a broader perspective on building codes, ensuring that they consider the needs and concerns of different stakeholders.

Economic Impact: Having well-regulated and safe buildings is essential for the economic well-being of Iowa. Safe structures attract businesses and residents, which can boost economic development and property values.

Disaster Resilience: Iowa is susceptible to various natural disasters, including tornadoes and floods. Building codes enforced with the council's guidance can enhance the resilience of structures, reducing damage during such events and facilitating a faster recovery process.

Education and Training: The council can also support education and training programs for builders and code enforcement officials. This helps ensure that professionals in the construction industry are knowledgeable about the latest codes and safety standards.

The Building Code Advisory Council in Iowa plays a vital role in promoting building safety, code compliance, and innovation in construction. Folding the responsibilities into another board or commission will diminish the integrity of the state building code and potentially politicized processes and mechanisms that have been working for over 50 years. The Council's work contributes to the state's overall well-being, economic growth, and disaster resilience.

Sincerely,

[Redacted signature]

[Redacted contact information]

505 Fifth Avenue, 3rd Floor • Des Moines, IA 50309
(515) 244-3113 • www.ELPC.org

Harry Drucker, Chairperson • Howard A. Learner, Executive Director
Chicago, IL • Columbus, OH • Des Moines, IA • Grand Rapids, MI • Indianapolis, IN
Minneapolis, MN • Madison, WI • North Dakota • South Dakota • Washington, D.C.

Owner:

[REDACTED]

Filename:

image001.png

Last Modified:

Tue Sep 05 14:33:11 CDT 2023



image001.png for Printed Item: 545 (

Attachment 2 of 2)

Page 925 of 1221

ENVIRONMENTAL LAW
& POLICY CENTER

From: [REDACTED]
[REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Iowa Athletic Training Licensure
Date: Tue Sep 05 2023 14:36:20 CDT
Attachments:

Good afternoon,

My name is [REDACTED] and I am a BOC Certified Athletic Trainer as well as an Iowa Licensed Athletic Trainer. I am reaching out to comment on the proposed changes to committees/boards in our state, particularly the recommended elimination of the Board of Athletic Training. This is very alarming for the safety of athletes in this state. Athletic trainers play a vital role in the safety of young athletes playing sports in our state daily. The presence of athletic trainers allows coaches to focus on coaching and allows a licensed healthcare provider to prevent, evaluate, treat, and rehabilitate injuries. Additionally, if an emergency occurs, athletic trainers are present to provide the necessary immediate care and activate an emergency action plan/response. Finally, and more specifically, with concussion care being such an important and vital topic, having trained professionals who can diagnose and treat head injuries accurately and effectively is necessary for safe participation in sports.

47 states and the District of Columbia require Athletic Trainers to be licensed. Removing the licensure requirement would be detrimental to all athletic trainers in the state and would be a major step back for sports medicine in the state of Iowa. Athletic Trainers are healthcare professionals who specialize in the prevention, diagnosis, and intervention of emergent, acute, and chronic medical conditions involving impairment, functional limitations, and disabilities. As an athletic trainer, I am trained to handle emergency situations and provide the best care for the athletes who participate in Iowa. Athletic training licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for healthcare professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied healthcare profession.

If the licensing system for athletic trainers was removed, it would be up to the schools that are hiring athletic trainers to determine the viability of an individual to be an athletic trainer. That means the schools and often athletic administrators or coaches who are not trained in healthcare will be charged with determining who is qualified to provide healthcare. While I have respect for athletic administrators and coaches, they are not the best individuals to hire a

healthcare provider. Overall, this change hurts the public and makes participation in sports less safe.

Thank you for your time,

[Redacted]

[Redacted]

Join the team behind the team! Visit [Give to Athletic Training](#) to support our team.

Northwestern College
101 7th Street SW
Orange City, Iowa 51041

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: IATS Licensure Support Letter - Oklahoma Athletic Trainers' Association
Date: Tue Sep 05 2023 14:47:47 CDT
Attachments: OATA supporting IATS.docx

All,

Please see the attached letter in support of the licensure of athletic trainers in Iowa.

--

Best,

[REDACTED]

Owner:

[REDACTED]

Filename: OATA supporting IATS.docx

Last Modified: Tue Sep 05 14:47:47 CDT 2023



To: Iowa Athletic Trainers' Society

From: [REDACTED]

To Whom It May Concern:

Please accept this letter showing our support of the Iowa Athletic Trainers' Society Board of Athletic Training. Iowa has been a long-time leader in the profession of athletic training across the country. To have such a dense population of athletic trainers (ATs) and so few complaints is proof that the Board and the IATS are doing their jobs of maintaining high levels of healthcare for athletes and patients that are cared for by licensed athletic trainers.

Ending the licensure of athletic trainers in the state of Iowa would be a tremendous step backwards. Athletic trainers are healthcare professionals specializing in the prevention, treatment, and rehabilitation of injuries in the athletic and physically active population. ATs have previously required a minimum of a bachelor's degree from a college or university accredited by the Commission on Accreditation of Athletic Training Education (CAATE) and that standard has just recently been raised to a required master's degree. Athletic trainers must also pass a comprehensive national Board of Certification exam and are currently regulated in 49 states, including Iowa. Removing this licensure would increase the dangers of adequate, professional, and highest standards of healthcare for athletes and patients in Iowa as licensure helps provide scope of practice guidance and protects the public from untrained, inadequately educated individuals. In short, licensure provides the highest level of protection for the public's safety and is the standard in regulating all other healthcare professions.

We, Oklahoma Athletic Trainers' Association, strongly support maintaining the licensure of athletic trainers in Iowa as their leadership has been profound for other states in this region.

In support,

[REDACTED]

[REDACTED]

President, Oklahoma Athletic Trainers' Association

From: [REDACTED]
[REDACTED]
To: BCRCComments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Public input 9/6/2023
Date: Tue Sep 05 2023 14:48:04 CDT
Attachments:

Hello,

My name is [REDACTED], I am a current MSW student intern with National Association of Social Workers Iowa Chapter. I am interested in speaking at the public hearing in regards to the potential merge/consolidation of the Iowa Board of Social Work.

Thank you!

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by Mimecast Ltd, an innovator in Software as a Service (SaaS) for business. Providing a safer and more useful place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Comments on AT Licensure
Date: Tue Sep 05 2023 14:49:04 CDT
Attachments: image001.png

Hello-

I am reaching out to voice my opinion AGAINST eliminating licensure for Athletic Trainers in the state of Iowa. I work at one of the many community college in Iowa and feel that it is important to make sure athletic trainers that are hired at these schools are held accountable for their basic certification. Enforcing the licensure gives the public confidence that they are working with a certified and competent athletic trainer. With the rise in cardiac related deaths, heat injuries, concussions, and other injuries the public, parents, and educators need to be sure they have hired or are working with a trained individual.

Thank You!

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Owner:

Filename:

image001.png

Last Modified:

Tue Sep 05 14:49:04 CDT 2023



From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic Trainer Licensure Board
Date: Tue Sep 05 2023 14:50:05 CDT
Attachments:

Good afternoon,

My name is [REDACTED] and I am the supervisor for the athletic training outreach program at Greater Regional Health in Creston Iowa.

I am reaching out to comment on the proposed changes to committees/boards in Iowa and particularly the recommended elimination of the Board of Athletic Training. I cannot begin to state how alarming this is for the safety of athletes in our state. Athletic trainers play a vital role in the safety of young athletes playing sports in our state daily. The presence of athletic trainers allows coaches to coach and allows a licensed healthcare provider to prevent, evaluate, treat, and rehabilitate injuries. Additionally, if an emergency occurs, athletic trainers are present to provide the necessary immediate care and activate an emergency action plan/response. Finally, and more specifically, with concussion care being such an important and vital topic, having trained professionals who can diagnose and treat head injuries accurately and effectively is necessary for safe participation in sports.

There are many stories of the importance of athletic trainers, too many for this one email, but I will share a few. [REDACTED] who graduated from Pleasant Valley High School and played football at Iowa, was working out in Bettendorf and collapsed. An athletic trainer's quick and effective response to his cardiac issue is why he is still alive today. Last year, athletic trainers at two different high schools in Iowa accurately diagnosed internal organ damage and saved their athlete's lives. Athletic trainers at a university in Iowa saved the life of a basketball manager during practice a few years ago and saved an athlete from paralysis last year by properly treating a cervical spine injury. I could go on and on with more stories. In each case you needed a licensed healthcare professional there, on site, to have a positive outcome. Having to call medical help or having someone without the right qualifications present could have led to a poor outcome. Athletic trainers are the professionals that are trained to be on site and take care of these injuries.

If the licensing system for athletic trainers was removed, it would be up to the schools who are hiring athletic trainers determine the viability of an individual to be an athletic trainer. That means the schools and often athletic administrators or coaches who are not trained in

healthcare will be charged with determining who is qualified to provide healthcare. While I have respect for athletic administrators and coaches, they are not the best individuals to hire a healthcare provider. Overall, this change hurts the public and makes participation in sport less safe.

Additionally, by removing the licensure system from our state, we would rely only on the Board of Certification (BOC) exam as a way of assessing the quality of an athletic trainer. While this exam is designed to protect the public by screening recent graduates for basic knowledge and skill, a means for our state to monitor athletic trainers and ensure continuing education is necessary for public protection as best practices will naturally evolve over an athletic trainer's career.

The move to eliminate the Board of Athletic Training is a backward movement in comparison to the rest of the country. Across the US, 49/50 states have some form of regulation of the profession athletic training. The one remaining state has an active bill which would require regulation of the practice of athletic training. Licensure is required in 47/50 states. Thus, by moving away from licensing athletic trainers in our state, we would be moving in the opposite direction of everyone else and in this case, being different is not a good thing.

Finally, as a parent, I want my kids to be safe when playing in sports. I know injuries will happen, but I expect the school or organization to have the properly trained individuals on site to provide care. Removing the Board of Athletic Training and licensure system takes away an important and effective means to ensure qualified individuals are providing that care.

Thank you for the consideration of these comments and I ask that you reach out to the committee members making this decision and reconsider the elimination of the Board of Athletic Training. Thank you for your time!

Sincerely,

[Redacted signature]

[Redacted contact information]

[Redacted contact information]

Get Outlook for iOS

NOTICE: This transmission, including any attachments, is covered by the Electronic Communications Privacy Act, 18 U.S.C 2510-2521 and is for the sole use of the intended recipient(s). This communication may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender for directions for disposal or deletion. Please consider the Environment before printing this e-mail.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Department of Orthopedics and Rehabilitation
Date: Tue Sep 05 2023 14:58:54 CDT
Attachments: AT Board of Athletic Training .docx
image001.jpg

September 5, 2023

To whom it may concern:

We, the faculty of the Department of Orthopedics and Rehabilitation at the University of Iowa, are curious and concerned about the recent proposal that risks weakening or eliminating state oversight of athletic training healthcare professionals, which is currently provided by the Iowa Board of Athletic Training.

The increasing use of athletic trainers as clinicians, and the Master of Science in Athletic Training program at UI, are both critically important to the state of Iowa. As clinicians, athletic trainers serve as important members of the healthcare team and are increasingly expected to deliver high-quality care to athletes of all ages and abilities. In our institution, they are integral members of our faculty, and their educational program strengthens the mission of our department and the College of Medicine.

It is not clear to us what the consequences of the Boards and Commissions Review Committee's recommendations will be. Our understanding is that Iowa Senate File 514 has given a mandate to the BCRC to decrease the number of advisory boards. While decreasing wasteful spending and needless bureaucracy is a laudable goal, it must be done with care and due diligence to avoid any unintended negative consequences.

We have searched and reached out to representatives of state government to understand the details of the proposal, but the specific plan, intent, and rationale have not been forthcoming. Our concern is that eliminating or weakening the board and licensing for athletic training would

be a step backward in common sense healthcare reform, allow athletic training to become completely unregulated in our state (and puts us at odds with the other 47 states and District of Columbia which mandate licensure of athletic trainers), increase the cost of care of injured athletes, and decrease or eliminate our ability to work with these skilled providers. Most importantly, we fear that without minimum standards of education and peer oversight, the quality of practitioners in Iowa will decrease and it will negatively impact patient care. It is not possible to fully envision the potential effects, either positive or negative, of this proposed action without more information and clarity. However, we assert that our healthcare system depends on strong state boards to assure that all providers provide a safe and effective level of care; this must continue to include athletic training.

We urge the BCRC and our elected representatives to approach this issue with the attention and nuance it deserves. Please slow down, consult the public and relevant experts, and ensure that we continue to strive to make healthcare in Iowa accessible, affordable, and valuable to all our citizens. We appreciate your thoughtful deliberation on this critically important issue.

Sincerely,

[Redacted signature block]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Owner:

[REDACTED]

Filename: AT Board of Athletic Training .docx

Last Modified: Tue Sep 05 14:58:54 CDT 2023



September 5, 2023

To whom it may concern:

We, the faculty of the Department of Orthopedics and Rehabilitation at the University of Iowa, are curious and concerned about the recent proposal that risks weakening or eliminating state oversight of athletic training healthcare professionals, which is currently provided by the Iowa Board of Athletic Training.

The increasing use of athletic trainers as clinicians, and the Master of Science in Athletic Training program at UI, are both critically important to the state of Iowa. As clinicians, athletic trainers serve as important members of the healthcare team and are increasingly expected to deliver high-quality care to athletes of all ages and abilities. In our institution, they are integral members of our faculty, and their educational program strengthens the mission of our department and the College of Medicine.

It is not clear to us what the consequences of the Boards and Commissions Review Committee's recommendations will be. Our understanding is that Iowa Senate File 514 has given a mandate to the BCRC to decrease the number of advisory boards. While decreasing wasteful spending and needless bureaucracy is a laudable goal, it must be done with care and due diligence to avoid any unintended negative consequences.

We have searched and reached out to representatives of state government to understand the details of the proposal, but the specific plan, intent, and rationale have not been forthcoming. Our concern is that eliminating or weakening the board and licensing for athletic training would be a step backward in common sense healthcare reform, allow athletic training to become completely unregulated in our state (and puts us at odds with the other 47 states and District of Columbia which mandate licensure of athletic trainers), increase the cost of care of injured athletes, and decrease or eliminate our ability to work with these skilled providers. Most importantly, we fear that without minimum standards of education and peer oversight, the quality of practitioners in Iowa will decrease and it will negatively impact patient care. It is not possible to fully envision the potential effects, either positive or negative, of this proposed action without more information and clarity. However, we assert that our healthcare system depends on strong state boards to assure that all providers provide a safe and effective level of care; this must continue to include athletic training.

We urge the BCRC and our elected representatives to approach this issue with the attention and nuance it deserves. Please slow down, consult the public and relevant experts, and ensure that we continue to strive to make healthcare in Iowa accessible, affordable, and valuable to all our citizens. We appreciate your thoughtful deliberation on this critically important issue.

Sincerely,

[Redacted signature block]

Owner:

[REDACTED]

Filename: image001.jpg

Last Modified: Tue Sep 05 14:58:54 CDT 2023

image001.jpg for Printed Item: 555 (
Attachment 2 of 2)



UNIVERSITY of IOWA
HOSPITALS & CLINICS

University of Iowa Health Care

Department of Otolaryngology
and Rehabilitation

Page 947 of 1221

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Board of Athletic Training
Date: Tue Sep 05 2023 14:59:43 CDT
Attachments: image001.png

Dear Boards & Commissions Review Committee:

I am the Chief Human Resources Officer at Greater Regional Health in Creston, IA. I have been in HR here at the hospital for over 17 years. At GRH we want to hire the most qualified, dedicated and experienced healthcare professionals. In order to do this, we must rely on the state governing agencies to establish a way of assessing the quality of an athletic trainer.

I am writing in regard to the topic of elimination of advisory boards including the Board of Athletic Training. If the licensing system for athletic trainers was removed, it would be up to the schools who are hiring athletic trainers determine the viability of an individual to be an athletic trainer.

That means the schools and often athletic administrators or coaches who are not trained in healthcare will be charged with determining who is qualified to provide healthcare. While I have respect for athletic administrators and coaches, they are not the best individuals to hire a healthcare provider. Overall, this change hurts the public and makes participation in sport less safe.

Here in Creston we were fortunate enough to have an Athletic Trainer save a wrestler at the Iowa High School State Wrestling Tournament. He noticed the wrestler was struggling after his match, but the wrestler brushed off any assistance. As the mats were cleared for intermission, the wrestler collapsed, and the athletic trainer was the first to respond and quickly move into action with CPR. His knowledgeable and experienced reaction saved this young man's life.

I ask you to reconsider the removing the Board of Athletic Training and licensure system. If you do so, it takes away an important and effective means to ensure qualified individuals are providing that care. Thank you for the consideration of these comments and I ask that you to reconsider the elimination of the Board of Athletic Training.

Sincerely,

[REDACTED]

CONFIDENTIALITY NOTICE: This transmission, including any attachments, is covered by the Electronic Communications Privacy Act, 18 U.S.C 2510-2521 and is for the sole use of the intended recipient(s). This communication may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender for directions for disposal or deletion." Please consider the Environment before printing this e-mail.

NOTICE: This transmission, including any attachments, is covered by the Electronic Communications Privacy Act, 18 U.S.C 2510-2521 and is for the sole use of the intended recipient(s). This communication may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender for directions for disposal or deletion. Please consider the Environment before printing this e-mail.

Owner:

[REDACTED]

Filename: image001.png

Last Modified: Tue Sep 05 14:59:43 CDT 2023

image001.png for Printed Item: 558 (Attachment 1 of 1)

**Greater
Regional**
HEALTH



Greater Regional Health is a
2022 Top Workplace®

Page 951 of 1221

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Fwd: Athletic Trainers Licensing Board
Date: Tue Sep 05 2023 15:04:40 CDT
Attachments:

Greetings,

I am reaching out to share my concern regarding the recently formed Boards and Commissions Review Committee (BCRC), who intend to eliminate over 140 advisory boards, including the Board of Athletic Training.

State Board Certification and Licensure is critical to the regulation of health care in this country. Not only will this decision drive professional athletic trainers to seek work in other licensed states (47 to be exact) it will leave our patients vulnerable, not knowing who is practicing ethically and ensuring that the highest level of care is being provided. The governing boards mandate these standards and without their oversight, the level of care being provided will suffer.

I work alongside some very talented athletic trainers, and I know for certain, that if their licensing board is eliminated, they will likely leave the state of Iowa. How is this helping the people of Iowa exactly? What are the proposed benefits? Do the people making these decisions have any medical knowledge of the work these professionals do and the impact this decision will have on our medical community? If not, I implore those making this decision to reach out and speak with our UIHC leadership, to fact gather and to ensure they are making the best informed decisions moving forward.

I implore those who are weighing in on this decision, to reconsider and vote no, keeping the licensing boards in place for our Athletic Training professionals.

Not only will our medical community will be greatly impacted if this decision moves forward and they eliminate the athletic trainers licensing board, our athletes and patients of Iowa will suffer the most.

Do better.

[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Iowa Chiropractic Society Comments
Date: Tue Sep 05 2023 15:07:34 CDT
Attachments: image001.png

Dear Board and Commission Review Committee,

On behalf of the Iowa Chiropractic Society and our members, I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

1. This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
2. This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
3. Merging with certain other professional boards may create conflicts of interest on similar issues for regulation
4. We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Thank you,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Note to intended recipients: Email is not a secure method of communication. If you prefer to avoid or limit email, please let me know immediately.

Owner:

[REDACTED]

Filename: image001.png

Last Modified: Tue Sep 05 15:07:34 CDT 2023

IOWA



CHIROPRACTIC

S O C I E T Y

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Re: Athletic Training Licensure Board and Licensing
Date: Tue Sep 05 2023 15:15:37 CDT
Attachments: image001.jpg
image002.jpg

I would like to attend the BRCC meeting tomorrow.

I am interested in providing in person comments on the athletic training board status.

[REDACTED]

[REDACTED]

[REDACTED]

Sent from my iPhone
Get Outlook for iOS

—

From: [REDACTED]
Sent: Thursday, August 31, 2023 10:30:02 AM
To: bcrccomments@iowa.gov <bcrccomments@iowa.gov>
Subject: Athletic Training Licensure Board and Licensing

I am the Director of Sports Medicine at Iowa State University and reside in Nevada.

I was just made aware there will be a recommendation to eliminate the licensing board for Athletic Training and potentially athletic training licensure.

Athletic trainers are front line health care workers and the setting which they work are now very diverse. They also now require a masters degree in Athletic Training to sit for the national board exams and thus to qualify for Iowa License to practice. Athletic Training has become a specialty sports medicine service with extensive education and preparation. The state of Iowa has multiple master's programs in our university and colleges educating future people in this profession. It's growth, and subsequent expansion of services across our state has been due to the requirement and assurance of qualified individuals rendering care, just like any other medical profession.

The growth of this profession and the availability of services to athletes and people at all levels has occurred due to the professional demands required to practice. This has occurred because we have ensured competency for the public as to their qualifications by requiring a license just like physicians, physical therapists, radiologists, etc. As you well know, licensure is in place, particularly for health related professions, and to protect the public. Licensure in Iowa has been in place for over 25 years, and has been very successful. There are over 1,100 practicing athletic trainers in Iowa. They work in all settings from schools to universities to pro sports, to private clinics, industry, and corporations. They do so with the assurance of qualifications provided by proving they are licensed. There are few complaints filed to the licensing board, mostly because AT's are professionally prepared and aware of the requirements demanded of being license. It has done it's job to promote professional care. Removing the Board because there are few complaints is akin to removing fire departments because the number of fires are down.

If licensure is eliminated, virtually anyone can claim to be a qualified health care professional athletic trainer, with NO assurance to the public who they are getting. I can personally attest to this, because prior to licensure, we had school janitors, local fitness enthusiasts, and high school/college drop outs serving as the "athletic trainer" for schools and organizations. Every state except California currently requires licensure. California still can't get this right with no licensure, and they have more reported problems of inappropriate care, services, etc. than anyone in the country, and athletes and students are suffering the consequences.

I was one of the original writers of the state law and the rules and regulations of the board and have been a former Board chair. I can assure you, if licensure is repealed, it will not be long where the public risk will significantly increase when it comes to on-site sports medicine coverage by athletic trainers and the state and many of its entities (namely schools and universities) will have far bigger problems to deal with.

I am being told the Department of Inspections, Appeals, and Licensure is going to recommend discontinuance. I can't fathom that they would recommend discontinuance of any health related licensing, particularly one where it many times involves youth and young adults. This can't really be a cost cutting measure since the licensing board meets virtually and requires no dedicated staff to run it and in the end, actually generates revenue to exceed any costs for the state through licensing fees. Should this go through, the impact will surely be felt swiftly and publicly. It would be an epic failure of our state government to not provide protection of the

public in this specific area.

Obviously I'm passionate about this, so if you need to call me, let me know.

Please consider all of this. It is an unnecessary action without financial or logical merit with far reaching consequences.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

CONFIDENTIALITY NOTICE: This E-mail (included in the attachments) is covered by the electronic Communications Privacy Act, 18 U.S.C. §§ 2510-2521, is confidential and may be legally privileged. If you are not the intended recipient, you are hereby notified that any retention, dissemination, distribution, or copying of this communication is strictly prohibited. Please reply to the sender that you have received the message in error, and then delete it. Thank You.

Owner:

[REDACTED]

Filename: image001.jpg

Last Modified: Tue Sep 05 15:15:37 CDT 2023

image001.jpg for Printed Item
563 (Attachment 1 of 2)

Page 961 of 1221

Owner:

[REDACTED]

Filename: image002.jpg

Last Modified: Tue Sep 05 15:15:37 CDT 2023



From:

[REDACTED]

To:

bcrccomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Bcc:

Subject: Athletic Trainer Certification

Date: Tue Sep 05 2023 15:23:03 CDT

Attachments:

I feel doing away with certifications for athletic trainers would be a big mistake. Doing so would cause many schools to not even offer athletic trainers due to potential issues with non certified trainers. Would you want someone that was not certified treating your child or grandchildren if something was to happen to them playing sports. If you're like other people you wouldn't even want to take your vehicle to an uncertified mechanic but you would want an uncertified trainer treating your child. Sorry I don't think that I would want that.

[REDACTED]

From: [REDACTED]
[REDACTED]
[REDACTED]
To: BCRCCOMMENTS@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Public Comments for Boards and Commissions Review Committee
Date: Tue Sep 05 2023 15:35:40 CDT
Attachments: 1914_001.pdf
image124369.png

Specific to recommendations regarding the Iowa Board of Athletic Training and Athletic Training Licensure.

This email may contain confidential information.
Click here for the [REDACTED] Confidentiality Agreement (v.1).

[REDACTED]
[REDACTED]
[REDACTED]

Owner:

[REDACTED]

Filename: 1914_001.pdf

Last Modified: Tue Sep 05 15:35:40 CDT 2023



Tuesday, September 5, 2023

Dear Iowa Boards and Commissions Review Committee:

I am submitting this letter to voice concerns over the potential elimination of the Iowa Board of Athletic Training and deregulation of the athletic training credential in the state of Iowa. While I appreciate the Iowa Boards and Commissions Review Committee working to improve efficiencies and reduce burdens on state government, deregulating the athletic training profession would create dangers to public safety and allow anyone to call themselves and athletic trainer without ensuring proper education and training.

I currently work at OrthoNebraska, serving as the Assistant Manager for Sports Medicine. I have worked in a variety of capacities in Iowa, including as a clinical athletic training, and outreach athletic trainer covering youth sporting events and rodeo. Licensure requirements ensure that athletic trainers in the state have met required education and training standards before being able to practice in the state. Meeting these standards for Licensure serves as a benchmark for OrthoNebraska and other organizations, ensuring patient safety by employing qualified medical professionals. Without regulation of the athletic training profession, there is no assurance that a person calling themselves an athletic trainer in the state of Iowa has met the same educational and training requirements as athletic trainers in other states that have regulation.

Athletic trainers work with a variety of vulnerable populations in the clinic, high school, collegiate and other settings. Athletic trainers need to be regulated to ensure patient safety through established standards for Licensure. Concussion regulation House File 2442 lists athletic trainers as a "licensed health care provider." Athletic trainers in the high school and collegiate settings are often the first to evaluate and athlete following a concussion, help with concussion management, and make return-to-play decisions. Deregulating licensure would not guarantee an athlete is getting medical advice from qualified medical personnel denoting themselves as being athletic trainers. Situations like the recent case with Damar Hamlin of the Buffalo Bills would not guarantee qualified athletic trainers would be on the field in a cardiac emergency.

Finally, licensure boards ensure that if there are questions regarding the actions of a health care professional, there are reporting options available. Ensuring there is a board in place to hear complaints is paramount to public safety and letting the voice of the athletic trainer be heard as well. OrthoNebraska would recommend the continuance of the Iowa Board of Athletic Training to allow for concerned parties to be heard. Some have cited a lack of discipline cases as being the reason to discontinue the Board. I would challenge that the lack of discipline demonstrates the regulatory process works, serving as a deterrent and establishing guardrails to protect the public and the profession.

Thank you for taking the time to review my comments. If you have any questions, or would like to discuss further, please do not hesitate to contact us.

Sincerely,



Owner:

[REDACTED]

Filename: image124369.png

Last Modified: Tue Sep 05 15:35:40 CDT 2023

image124369.png for Printed Item: 567 (Attachment
of 2)

Page 969 of 1221

From: [REDACTED] .kleese@gmail.com>
<troy.kleese@gmail.com>
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic Trainer Board and Licensure
Date: Tue Sep 05 2023 15:35:45 CDT
Attachments:

Committee,

I am a Certified Athletic Trainer and I'm writing to urge you not to eliminate the Board of Athletic Training or the professional license for athletic trainers.

The Board of AT is a financially viable entity, thus the elimination of the Board does nothing when it comes to saving the State of Iowa money.

The Athletic Training profession is an allied health care profession as recognized by the American Medical Association, thus should be viewed just as any other health care profession in the state when it comes to scope of practice standards and protection of the patients we serve.

Elimination of the athletic trainer licensure may impact the employment status of athletic trainers within the state, while traveling with their teams to other states, or if they move to other states to seek employment. The potential elimination of jobs would go against what I believe the current state administration stands for when it comes to employing Iowans and when it comes to attracting folks to come work in our state.

I respectfully request that the elimination of the AT Board and the elimination of the Athletic Training license be removed from consideration by the Committee.

Thank you.

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc: dawn.driscoll@legis.iowa.gov
<dawn.driscoll@legis.iowa.gov>
Bcc:
Subject:
Date: Tue Sep 05 2023 15:38:26 CDT
Attachments:

To Whom It May Concern,

It has been brought to my attention that there is discussion of eliminating the Athletic Training Licensure Board. As a high school athletic director and coach, I find this very troubling. When we have had sports teams travel to away sporting events, it has not been a concern as to whether the medical professional on the sidelines has been an athletic trainer. We have trusted the athletic trainer at wrestling tournaments to do the right thing for our student-athletes because they know what they are doing. However, if you eliminate the athletic training licensure that changes everything. Athletic trainers will no longer be regulated. Anyone can pose as an athletic trainer. Someone that is not qualified can be working as a "medical professional" without the proper training and let an athlete return to a sporting event when they should have been taken out. This puts more stress on the school districts to make sure they hire someone that is properly trained and qualified, and also increases their liability if something were to go wrong.

Maintaining the Athletic Training Licensure Board ensures that athletic trainers are following regulations, but also ensures student-athletes are safe.

--

[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: HIS Board
Date: Tue Sep 05 2023 15:41:13 CDT
Attachments:

To Whom It May Concern:

My name is [REDACTED]. I am a practicing ENT surgeon in NW Iowa and am writing to say that I believe eliminating the board of hearing instrument specialists is a mistake. We receive many referrals from multiple HIS in the area and believe that without them many of these people would be delaying treatment or not coming in at all. I also know that the standards that they are held to are important to keep people safe. They are mandatory reporters as are we. They are held to ethical standards to make sure they are not selling hearing aids to people who would benefit from medical intervention. They also are who I rely on to treat the cases when surgery and medicine is not the complete solution. Patients who come to me many times still need hearing aids and counseling that buying something unsupported would give less than satisfactory results. The board certification insures that they keep themselves up to date with the training they need to help people at the highest level. You cannot expect the OTC market to accommodate the needs of anyone but people with mild hearing loss as is mandated by the FDA. If you take away the need for certification, who is going to be left to take care of everyone else who needs the additional help? The difference is already confusing for patients. Once there is no need for board certification, the difference will be even murkier and will most likely lead to many leaving the profession altogether. I think it is very premature to end this board.

Thank you,

[REDACTED]
Sent from my iPhone

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>; tom.shiple@legis.iowa.gov
<tom.shiple@legis.iowa.gov>; tom.moore@legis.iowa.gov
<tom.moore@legis.iowa.gov>; [REDACTED]
Cc:
Bcc:
Subject: Athletic Trainer's
Date: Tue Sep 05 2023 15:41:57 CDT
Attachments:

To all this concerns:

I am writing as I just received notice that the Iowa Board of Commissions recently met and discussed de-regulating or doing away with the Athletic Training commission for the state of Iowa. Of all 259 boards and regulatory bodies this is the one they want to hang their hat on. This is a terrible idea, for young and older novice athletes, student athletes, collegiate student athletes, and professional athlete's alike.

I am currently a Physician Assistant here in the state of Iowa. I have worked in the orthopedics and sports medicine realm for the past 11 years. I have served southwest Iowa rural communities, public and private school systems and athletes. I have worked with [REDACTED] in Oklahoma City, who has been team physician for the Oklahoma Sooners football and gymnastics teams respectively. So I consider myself having a lot of firsthand knowledge of services that athletic trainer's provide, and the excellent service's that are provided by their training background, their continuing education, and hands on ability to diagnose and treat a plethora of sports injuries and their ability to know when to move to the next rung in the ladder of care.

The people that will be most affected by the loss of board commissioned Certified Athletic trainer's (CAT) is the youth in every community, but most of all those in rural communities with limited access to first line care. This includes most of Iowa as a whole. These CAT are an integral part of a young athlete's care at the community and private school levels. It is football season at the moment, and one of the biggest concerns over the last several years is "concussion protocols." This is only one place where CATs make a huge impact. One reason for these protocols and taking this decision away from coaches and staff was the concern that protocols and standards weren't being followed. Having someone licensed and certified takes the responsibility off of the schools, coaches, and staff and sets it squarely on a licensed professional that is educated and trained to make those decisions. I understand that coaches and staff members have to do "mandatory training" on this to know the signs and symptoms, but often times in the heat of the battle they aren't always focused on these ancillary issues. This can be said the same with fractures and other significant injuries that young athletes sustain that "Coach Joe" who is an accountant in town but coaches the kids during the football season may not know or understand. Again, as I work in the medical field I'll put things in this light. Say It's your mom, grandma, kid, etc., suffers a sudden cardiac arrest. Now, I as an

orthopedist am currently certified in Advanced Cardiac Life Support (ACLS), which I re-test every 2 years as mandatory in the event someone at the hospital suffers from this same ailment of sudden cardiac arrest. Who would you rather have performing CPR and medical care for your loved one? Myself with 11 years of orthopedic and sports medicine experience, who hasn't ran an actual code for the past 11 years? Or, would you rather have an experienced board certified frontline provider or cardiologist performing life saving measures on them?

That being said, I am confident I would perform ACLS as directed in the book and certification class. But I would not move someone out of the way that has more experience than me to care for anyone's loved one. These are school aged kids, which typically don't know what's best for them other than they want to play sports. A 10-17y/o kid is not worried about what life is going to be like 10-40yrs from an injury they sustained at that young age. That is for the health professionals to be concerned with and have educated conversations with them and their parents. The frontline of this care starts with the Certified Athletic Trainer.

In closing, I want to reiterate that small communities and rural health is the majority of Iowa and healthcare at the school age often starts with school nurses and staff, and sports medicine typically starts with the athletic trainers. To lose them and allow any Tom, no offense Mr. Shipley, Dick, or Harry to practice frontline medicine and modalities to our youth would be taking many steps backwards from where we came from. We need to be forward looking not setting ourselves back.

Thanks for your time, I hope this hits home.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Public Comments for AT Regulatory Board UNSECURE
Date: Tue Sep 05 2023 15:45:02 CDT
Attachments: image430079.png
Signed Letter for ATC in Iowa 9.5.23.pdf

Hello!

Please see attached for public comments from OrthoNebraska Clinics for the meeting on 9/6/23 RE: Athletic Trainer Regulatory Board. If you have any further questions, please do not hesitate to reach out. Thank you!

Regards,

[REDACTED]

[REDACTED]

[REDACTED]

Owner:

[REDACTED]

Filename: image430079.png

Last Modified: Tue Sep 05 15:45:02 CDT 2023

image430079.png for Printed Item: 574 (Attachment
of 2)

Page 977 of 1221

Owner:

[REDACTED]

Filename: Signed Letter for ATC in Iowa 9.5.23.pdf

Last Modified: Tue Sep 05 15:45:02 CDT 2023



OrthoNebraska
2808 S 143rd Plz
Omaha, NE 68144

Tuesday, September 5, 2023

Dear Iowa Boards and Commissions Review Committee:

OrthoNebraska is submitting this letter to voice concerns over the potential elimination of the Iowa Board of Athletic Training and deregulation of the athletic training credential in the state of Iowa. While OrthoNebraska appreciates the Iowa Boards and Commissions Review Committee working to improve efficiencies and reduce burdens on state government, deregulating the athletic training profession would create dangers to public safety and allow anyone to call themselves and athletic trainer without ensuring proper education and training.

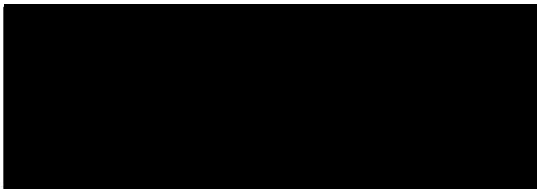
OrthoNebraska currently has three locations in Iowa, including Council Bluffs, Red Oak, and Atlantic. Athletic trainers have become an integral part of the organization, serving in a variety of capacities in the clinic setting, and performing community outreach to area youth organizations, athletic events, and rodeos. Licensure requirements ensure that athletic trainers in the state have met required education and training standards before being able to practice in the state. Meeting these standards for Licensure serves as a benchmark for OrthoNebraska and other organizations, ensuring patient safety by employing qualified medical professionals. Without regulation of the athletic training profession, there is no assurance that a person calling themselves an athletic trainer in the state of Iowa has met the same educational and training requirements as athletic trainers in other states that have regulation.

Athletic trainers work with a variety of vulnerable populations in the clinic, high school, collegiate and other settings. Athletic trainers need to be regulated to ensure patient safety through established standards for Licensure. Concussion regulation House File 2442 lists athletic trainers as a "licensed health care provider." Athletic trainers in the high school and collegiate settings are often the first to evaluate and athlete following a concussion, help with concussion management, and make return-to-play decisions. Deregulating licensure would not guarantee an athlete is getting medical advice from qualified medical personnel denoting themselves as being athletic trainers. Situations like the recent case with Damar Hamlin of the Buffalo Bills would not guarantee qualified athletic trainers would be on the field in a cardiac emergency.

Finally, licensure boards ensure that if there are questions regarding the actions of a health care professional, there are reporting options available. Ensuring there is a board in place to hear complaints is paramount to public safety and letting the voice of the athletic trainer be heard as well. OrthoNebraska would recommend the continuance of the Iowa Board of Athletic Training to allow for concerned parties to be heard.

OrthoNebraska thanks you for taking the time to review our comments. If you have any questions, or would like to discuss further, please do not hesitate to contact us.

Sincerely,



From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Licensure Boards Review Public Comment
Date: Tue Sep 05 2023 15:51:49 CDT
Attachments:

Dear Board and Commission Review Committee,

As a physician and small business owner in the state of Iowa, I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

CONFIDENTIALITY NOTICE: The contents of this email message and any attachments are intended solely for the addressee(s) and may contain confidential and/or privileged information and may be legally protected from disclosure. If you are not the intended recipient of this message or their agent, or if this message has been addressed to you in error, please immediately alert the sender by reply email and then delete this message and any

attachments. If you are not the intended recipient, you are hereby notified that any use, dissemination, copying, or storage of this message or its attachments is strictly prohibited.

From: [REDACTED]
[REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Oppose Merge of Iowa Chiropractic Licensing Board
Date: Tue Sep 05 2023 15:52:39 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board's knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]
[REDACTED]
[REDACTED]

Notice: The PHI (personal health information) contained in this Email is HIGHLY CONFIDENTIAL. It is intended exclusively for the addressee. It is to be used only for healthcare communication to this patient. Any other use is a violation of Federal Law (HIPPA) and will be reported as such.

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: IBHA Comments Boards & Comm Public Hearing 9.6.2023
Date: Tue Sep 05 2023 15:55:23 CDT
Attachments: IBHA Comments Boards & Commissions Public Hearing 9.6.2023.pdf

Please find attached comments & observations from the Iowa Behavioral Health Association regarding the Boards & Commissions Review Committee subcommittee recommendations.

Thank you for your time and consideration.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Advocacy & Knowledge Sharing for the Advancement of the Behavioral Health Field

IBHA is the leading voice to enhance the effectiveness and resiliency of nonprofit licensed/accredited organizations that provide prevention and treatment services for mental health, substance use, and gambling disorders. We represent 30 agencies across Iowa and a listing of member locations as well as programs and services offered is available at <https://www.ibha.org/preferred-providers/>

Owner:

[REDACTED]

Filename:

IBHA Comments Boards & Commissions Public Hearing 9.6.2023.pdf

Last Modified:

Tue Sep 05 15:55:23 CDT 2023



2900 100th Street, Suite 200, Urbandale IA 50322
515.309.3315 office
www.ibha.org
Flora@ibha.org

To: Boards & Commissions Review Committee
From: [REDACTED]
Date: 9.6.2023
Re: Comments / Public Hearing on Recommendations

On behalf of the Iowa Behavioral Health Association (IBHA), I am offering the following comments and observations regarding the Boards & Commissions Review Committee subcommittee recommendations.

FINDINGS – we concur with all 5 findings.

RECOMMENDATIONS – we concur with all 8 recommendations. Of special note:

- **Rec #3** - expanding access and participation through increased availability of virtual or hybrid meeting options is extremely valuable to IBHA’s membership to be able to participate in the numerous boards & commissions meetings.
- **Rec #5** – all boards and commissions should strive to obtain the best possible candidates to serve and the removal of the arbitrary gender balance should assist with this effort. IBHA has often been required to restart our candidate nomination process to the boards and commissions in which we have a dedicated appointee after being informed the board / commission needed to maintain the required gender balance and as such, our nominee(s) could not be appointed. This is extremely frustrating for those who took the time to be vetted by IBHA as our representative and had filled out the required paperwork to then be turned down not because of their qualifications to serve, but simply because of their gender.
- **Rec # 8** – licensing and credentialing processes and standards often create barriers to workforce entry within our industry and efforts to modernize this process and reduce the administrative burdens would be appreciated. Yet, we also urge caution to look out for those unintended consequences that would ultimately further complicate the system.

The need to eliminate, consolidate / merge and/or reorganize the 250+ state boards, commissions and committees is understandable and a needed undertaking to help improve the effectiveness and efficiency of the respective state departments, and as a means to best utilize the time and talents of the lowans serving on these entities as well as for the numerous staff, stakeholders and organizations like IBHA that regularly participate in the meetings.

IBHA recognizes the forthcoming changes will take time to implement and will probably face some hurdles and objections, yet both myself and IBHA’s members, look forward to continuing to work with our various state partners as this process moves forward.

Respectfully,

[REDACTED]

[REDACTED]

IBHA is the leading voice to enhance the effectiveness and resiliency of nonprofit licensed/accredited organizations that provide prevention and treatment services for mental health, substance use, and gambling disorders. We represent 30 agencies across Iowa and a listing of member locations as well as programs and services offered is available at: <https://www.ibha.org/preferred-providers/>

Advocacy & Knowledge Sharing for the Advancement of the Behavioral Health Field

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Iowa Chiropractic Board Combineing with other boards
Date: Tue Sep 05 2023 15:57:11 CDT
Attachments:

Dear Board and Commissions Review Committee,

I am writeing to you today to ask that you do not combine the Chiropractic Board with any other board.

My number one concern is for the safety of our patients in the state of Iowa, we need a board that is concerned for practice of Chiropractic only. We need members on the board who can concentrate and be more specific and knowledgeable for one profession only.

Volunteers who serve on these boards will not want to serve if they are spending a lot of time on other professions issues.

Currently they is trouble getting adequate investigations due to timeing and this will be worse if you combine boards..

Thank you for considering this issue, and Please for the sake of our citizens of our state ,, do not combine the Chiropractic Board with any other board,

Sicerely,

[REDACTED]

[REDACTED]

Sent from Mail for Windows

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Iowa Chiropractic Society request to speak
Date: Tue Sep 05 2023 16:11:10 CDT
Attachments:

Good afternoon,
The Iowa Chiropractic Society has already submitted comments. I was hoping to speak briefly along with [REDACTED] if there is still room.
Thank you,

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Board of Athletic Training support
Date: Tue Sep 05 2023 16:12:57 CDT
Attachments: Board of Athletic Training support letter.docx

Please see the attached letter of support to overturn the decision to eliminate the Iowa Board of Athletic Training.

Respectfully,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Owner:

[REDACTED]

Filename: Board of Athletic Training support letter.docx

Last Modified: Tue Sep 05 16:12:57 CDT 2023

Good afternoon,

My name is [REDACTED] and I am currently the COO of the Shenandoah Medical Center. I am writing this afternoon to ask that you support the overturning of the decision to eliminate the Iowa Board of Athletic Training. The elimination of this board, and subsequently the certification and oversight of the profession of Athletic Training that the board provides, is definitely a step in the wrong direction for Iowa, and the schools, club teams, semi-pro teams, and all the athletes that our highly trained ATCs provide.

I am a Physical Therapist by background, and have provided many hours of game coverage for multiple sports for our local high schools. I have a doctorate degree in physical therapy, but still advocated for my hospital to employ athletic trainers to provide this coverage because they are the most highly trained and qualified to provide the care needed on the field. Many times these cares are emergent in nature, and as someone who is also a parent of high school and middle school aged athletes, I do not want anything less than a highly trained individual, whose license or certificate is heavily regulated with requirements to maintain the most up-to-date skills, to be there in a time of need. Our hospital is passionate about this cause, which is why we invest well over \$45,000 yearly into providing these services to four local rural schools in our area, despite the fact that they are not reimbursable services through any insurance. You may question why we would make such a business decision, but I don't think that you have to look very far into the recent history of major professional sports to see the lifesaving services that athletic trainers can provide. I don't want to take too many liberties here because I have not spoken to him directly, but my guess is that it is safe to say that Damar Hamlin is extremely happy that the State of New York has a Board of Athletic Training, and that athletic trainers have the professional protections afforded by board certification. Otherwise, he might have been left to have whatever average Joe that was willing to come out of the crowd to provide him aid.

I, once again, would respectfully ask for your support in maintaining the Iowa Board of Athletic Training. From my understanding, the elimination of the board would make us the only state in the union to not have licensed or certified athletic trainers, and I truly do not think that is in the best interest of healthcare or of the student athletes in our great state.

Thank you,

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Support for the Iowa Board of Athletic Training
Date: Tue Sep 05 2023 16:14:34 CDT
Attachments:

To The Boards and Commissions Review Committee (BCRC)

I am reaching out with significant concern for Athletic training in Iowa. The proposed abolishment of the Iowa board of Athletic Training would be a huge mistake for healthcare in Iowa. I work with athletic trainers (ATs) every day in clinic, in the athletic training rooms and on the athletic fields/courts.

ATs are absolutely crucial and integral to the health and safety of our youth athletes in the high school and college setting. ATs specialize in dealing with urgent medical situations in sports but also in unique settings such as factories and the military. ATs require graduate medical training and 47 states and DC require AT licensure, and athletic training is a nationally recognized (AMA and HHS) health care profession. This licensure is crucial for maintaining appropriate training and scope of practice. We already have a relative shortage of ATs in our state, further placing youth athletes at risk of severe harm. Losing our state licensure and oversight would make hiring ATs here even more challenging. This would affect all local high schools, colleges of all levels, many workplace health systems, athletic training educational programs at U of Iowa and elsewhere, orthopaedic and other medical clinics, and many other venues.

I cannot support what the Iowa Board of Athletic Training does enough. It is absolutely vital to the health and safety of patients and athletes across the state. Its elimination would be an absolute disaster and travesty. I hope the elimination of the Board of Athletic Training is averted and reconsidered.

Sincerely,

A large black rectangular redaction box covering the signature area.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: SAY NO TO MERGING AUDIOLOGY WITH SPEECH PATHOLOGY!!!!
Date: Tue Sep 05 2023 16:23:49 CDT
Attachments:

To whom it may concern,

I am writing to express my strong opposition to any further merger of audiology with speech pathology in Iowa. The state faces a pressing need for hearing aid specialists (HIS), and maintaining their distinct licensure is crucial.

The demand for HIS in Iowa is growing rapidly due to the prevalence of hearing difficulties in our population. Having Hearing Instrument Specialists readily available to make accurate assessments and tailored recommendations ensures Iowans receive the best care possible all the time.

With such limited Audiologists in the area it'd be so difficult for patients to access good and convenient care. What AuD wants to work at COSTCO and sell hearing aids instead of a hospital or ENT clinic?

I urge you to consider the importance of preserving HIS licensure in Iowa to meet the growing demand for hearing health services effectively. Please support efforts to maintain and expand the availability of these specialized professionals.

Thank you for your attention to this matter.

Sincerely,

[REDACTED]

From: [REDACTED]
To: [REDACTED] <BCRCcomments@iowa.gov>
<bcrccomments@iowa.gov>
Cc: [REDACTED]
Bcc:
Subject: IAPMO Input on Boards and Commissions
Date: Tue Sep 05 2023 16:42:46 CDT
Attachments: 230905_IA_Board_Commission_Consolidation_Testimony_BR.pdf

Good afternoon,

On behalf of the International Association of Plumbing and Mechanical Officials, please find attached comments by Mr. [REDACTED], an Iowa resident, master plumber and master mechanical license holder in Iowa for 20 years.

DO not hesitate to request additional information or any clarification about the subject therein.

Respectfully,

[REDACTED]

[REDACTED]

Director of Government Relations

The IAPMO Group

314.337.3922

www.Twitter.com/IAPMOGR

www.UniformCodes.org

Owner:

[REDACTED]

Filename: 230905_IA_Board_Commission_Consolidation_Testimony_BR.pdf

Last Modified: Tue Sep 05 16:42:46 CDT 2023

Comments to the Boards and Commissions Review Committee
September 6, 2023

Dear distinguished members of the Boards and Commissions Review Committee. My name is [REDACTED], a longtime Iowa resident, a master plumber and master mechanical license holder in Iowa for 20 years. I submit these comments-as the Senior Vice President of Field Services-on behalf of the International Association of Plumbing and Mechanical Officials, commonly called IAPMO.

The State of Iowa has been well-served for decades by the Uniform Plumbing Code and ultimately, the Iowa Plumbing & Mechanical Systems Board (IPMSB). In understanding the spirit of Governor Reynold's intent for evaluation and simplification of Boards and Commissions in the State, we can understand the desire to streamline what appears convoluted. Through this vision, our primary concern is the preservation of public health. We believe this is achieved through our plumbing trade and in concert with other respective building trades. Specifically, by ensuring the primary source of plumbing regulations, standards, and licensure ensure public safety and prevent public health risks by upholding the highest standards.

Those currently serving on the IPMSB are the stalwarts in the Iowa plumbing field. They maintain a standard of excellence through professional guidance and depth of institutional knowledge by codifying the proven and reliable process of testing, education, and experience required to be a licensed practitioner, journeyman, or master plumber in Iowa.

If the consolidation of Boards and Commissions statewide is a certainty, our request is to quarantine the skilled trades from such collectivization. While each trade is not siloed and ever strives for continual cross-pollination, the wells of knowledge each skill demands is not only wide, but deep. They are able to not only determine "go/no-go" criteria, but the *how*...and *why* of best practices. This capacity can only exist with the preservation of excellence in institutional knowledge.

Thank you for your consideration of this matter. We appreciate the opportunity to collaborate and are happy to answer any questions you may have.

The IAPMO Group, founded in 1926, is a standards development organization and trade association that is a critical voice for the industry by focusing on the technical aspects of the plumbing and mechanical sectors. Our membership includes contractors, engineers, manufacturers, suppliers, plumbing and mechanical inspectors, and building officials. IAPMO's primary motive for action is to protect the public's health by promoting efficient and effective plumbing and mechanical systems.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: KEEP THE BOARD OF ATHLETIC TRAINING
Date: Tue Sep 05 2023 16:43:35 CDT
Attachments:

Dear Legislator,

I am writing with my great concern regarding the proposed abolition of the State Board of Athletic Training. While I am a conservative and generally in favor of small government, I fail to see the wisdom in this proposal and think doing so puts many Iowans at risk.

I know you've heard from many of my colleagues listing the various reasons for keeping the Board so I won't try to list them all now. Instead I'd like to add something you may not have thought of. In case you haven't noticed, our healthcare system is working the poorest I've ever seen it. Wait times are abysmal at all levels of care. The demand for healthcare services is high, supply is low, and if you come spend a day with me in the Emergency Department, you'll see what that leads to. Athletic trainers dramatically increase the scope of care that is provided by physicians throughout the state of Iowa. ATs practice under our direction, help triage the need for various health services, provide direct patient care, and are advocates for the preventative-minded approach we need for the health of Iowans. Deregulating the practice of athletic training threatens the future of the profession in Iowa and will damage our workforce and the health of Iowans.

I urge you to abandon this proposal immediately.

Sincerely,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Team Physician, UI Athletics.

From: [REDACTED]
[REDACTED]
To: BCRCComments@iowa.gov
<bcrccomments@iowa.gov>
Cc: [REDACTED]
Bcc: [REDACTED]
Subject: Opposition to Elimination Iowa's Board of Hearing Aid Specialists
Date: Tue Sep 05 2023 17:19:04 CDT
Attachments:

To whom it may concern,

Board of Hearing Aid Specialists.docx

My name is [REDACTED]. I am a Licensed Hearing Specialist in the State of Iowa. I am also Nationally Board Certified and Certified Hearing Instrument Dispenser in Minnesota. I have been a Hearing Care Professional for over 30 years, and I cannot disagree more with the recommendation to eliminate the Iowa Board of Hearing Specialists.

Eliminating the Board will lead to compromised patient safety, quality of care, access, and satisfaction.

12-13% of all hearing tests end with a medical referral leading to early diagnosis and treatment of an entire gambit of medical issues.

Eliminating licensure requirements will open the door to a number of unscrupulous companies and individuals who will prey upon the predominately senior populations we serve. You can look to Colorado for the decade long nightmare of no licensure board and the problems associated with that.

On the surface this looks like a cost-saving measure but in reality, you are transferring the costs from one part of the State government to another. The Office of the Attorney General will get flooded with a host on new cases.

The U. S. Food and Drug Administration's recent regulatory changes necessitate preserving the board, not eliminating it. This is because the FDA reclassified non-OTC hearing aids as "prescription medical devices" that may only be dispensed upon a prescription or other order from of state-licensed practitioner, including Hearing Aid Specialists.

Eliminating the Board will result in the loss of licensure for every Hearing Aid Specialist. This will effectively prevent hearing specialists from being able to assist Iowans to obtain the hearing care they need, and drastically reduce patient access across the state.

Eliminating the Board will force lowans to seek care from unregulated providers, many of whom will be fly-by-night hearing aid companies employing unscrupulous tactics to prey on the senior and other consumers that need help.

Eliminating the board will result in the loss of many smaller practitioners, many of whom own the small family businesses they run. Losing income and jobs in your districts.

Losing jobs. Restricting access, endangering Seniors, transferring cost and turning to a Wild West business model inviting unscrupulous entities into our communities does not sound like a winning proposition. I am strongly against the closure of the Board leading to the above.

Thank You,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Interior Design Examining Board - Keep intact
Date: Tue Sep 05 2023 17:19:52 CDT
Attachments:

Hello,

My name is [REDACTED] and I am a Registered Interior Designer living and working in Iowa. I'm reaching out in response to the Boards & Commissions Review Committee's August 29 recommendation to eliminate the Board of Interior Design. Registered interior design professionals directly impact on public health, safety, and welfare, and now that Registered Interior Designers can practice independently in Iowa, an oversight board led by practitioners and subject matter experts will be more important than ever before. I urge the Committee to consider keeping some form of a regulatory board overseeing Registered Interior Designers intact.

During the 2023 legislative session, the Iowa Legislature passed SF 135, with overwhelming bipartisan support, which expanded the state's interior designer registration to include the ability to stamp and seal nonstructural construction plans for permitting. Registered Interior Designers can now practice independently with that title. With that capability, the potential for risk to public safety exists with it. So even if there was little discipline necessary for RIDs before SF 135 become law, enforcement and disciplinary capacity of RIDs will be more critical than ever before. Those matters are best left to subject matter experts and practitioners in the profession, as they are in other states.

If maintaining the Board of Interior Design is not an option, perhaps it can be merged with the Board of Architects. Joint boards are utilized in many states in the US, and due to the overlap in practice between architects and registered interior designers, such a board would be uniquely qualified to enforce the law and discipline those that cause harm or break it.

Please keep a subject matter expert-led regulatory board intact for the interior design profession. Thank you.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The information contained in this communication may be confidential, and is intended only for the use of the recipient(s) named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please return it to the sender immediately and delete the original message and any copy of it from your computer system.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Opposition to Elimination of Iowa Board of Athletic Training
Date: Tue Sep 05 2023 17:22:42 CDT
Attachments: Outlook-Connect.png
Outlook-Follow.png
Outlook-Like.png
Outlook-photo.png
Outlook-Watch.png
Outlook-Watch.png
Outlook-Watch.png
Outlook-Watch.png

Dear Members of the Boards and Commissions Review Committee,

I hope this email finds you well. My name is [REDACTED], and I am a Licensed Athletic Trainer in the State of Iowa, working for the largest employer of Athletic Trainers in the country, Athletico. I work along alongside 350 athletic trainers in our company, with 50 of those 350 teammates residing and practicing in Iowa. I am writing to express my deep concern and strong opposition to the recent consideration of eliminating the Iowa Board of Athletic Training.

The Athletic Training profession is composed of Certified and Licensed Athletic Trainers from professional, collegiate, and high school teams; industries; physician offices; rehabilitation clinics; and every branch of the United State military working together to promote and practice the profession of Athletic Training within the State of Iowa. Athletic Trainers have a long history of providing quality health care for athletes and persons engaged in regular physical activity. They are highly skilled licensed health care professionals who specialize in immediate, acute, and emergency care, examination, assessment, injury prevention, risk management, therapeutic intervention and rehabilitation of injury and illness. We are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS) & also carry National Provider Identifier numbers (NPIs). Lastly, the American Medical Association (AMA) also recognizes Athletic Trainers as an allied health care profession.

The National Athletic Trainers' Association (NATA) represents and supports more than 45,000 members of the Athletic Training profession, including more than 1129 licensed Athletic Trainers in the State of Iowa. Licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for health care professions. It also

ensures clients and employers that an Athletic Trainer is properly trained, taking continuing education, and monitored. The associated Board of Athletic Training helps provide scope of practice guidance & protects the public from untrained persons. There is no expense associated with this Board. The fees that Athletic Trainers pay to renew their license cover all costs and year over year they are consistently in the black.

By eliminating the Board of Athletic Training and subsequent licensing for Athletic Trainers, we risk losing a dedicated group of professionals who are uniquely qualified to address the specialized needs of athletes and active individuals. Their knowledge in injury prevention, emergency response, and rehabilitation techniques is invaluable in safeguarding the health of those who rely on their expertise.

I urge this committee to reconsider this proposal and recognize the indispensable contributions that Athletic Trainers make to the communities of Iowa. Their skills and training are essential components of a comprehensive healthcare system that prioritizes the physical well-being of its citizens, especially in rural Iowa communities.

The move to eliminate the Board of Athletic Training is a backward movement in comparison to the rest of the country. Across the US, 49/50 states have some form of regulation of the profession athletic training. The one remaining state has an active bill which would require regulation of the practice of athletic training. Licensure is required in 47/50 states. Thus, by moving away from licensing athletic trainers in our state, we would be moving in the opposite direction of everyone else and in this case, being different is not a good thing.

In conclusion, I stand firmly against the elimination of the Iowa Board of Athletic Training and implore the Board to continue supporting this critical profession. Let us work together to ensure that athletes and active individuals throughout the state continue to receive the highest standard of care.

Respectfully,

[Redacted signature]

[Redacted signature]



This message may contain information that is confidential, privileged, or otherwise protected from disclosure. If this message contains Protected Health Information, its acquisition, transmission, storage and use is protected by HIPAA. If you are not the intended recipient, any review, disclosure, copying, or distribution, of this material is strictly prohibited. If you receive this message in error or are not the named recipient(s), please contact the sender immediately and delete this message. Thank you for your cooperation.

Owner:

[REDACTED]

Filename: Outlook-Connect.png

Last Modified: Tue Sep 05 17:22:42 CDT 2023



Owner:

[REDACTED]

Filename: Outlook-Follow.png

Last Modified: Tue Sep 05 17:22:42 CDT 2023



Owner:

[REDACTED]

Filename: Outlook-Like.png

Last Modified: Tue Sep 05 17:22:42 CDT 2023



Owner:

[REDACTED]

Filename: Outlook-photo.png

Last Modified: Tue Sep 05 17:22:42 CDT 2023

ATHLETICO

ATHLETIC TRAINING

Owner:

[REDACTED]

Filename: Outlook-Watch.png

Last Modified: Tue Sep 05 17:22:42 CDT 2023



Owner:

[REDACTED]

Filename: Outlook-Watch.png

Last Modified: Tue Sep 05 17:22:42 CDT 2023



Owner:

[REDACTED]

Filename: Outlook-Watch.png

Last Modified: Tue Sep 05 17:22:42 CDT 2023



Owner:

[REDACTED]

Filename:

Outlook-Watch.png

Last Modified:

Tue Sep 05 17:22:42 CDT 2023

The image shows the YouTube logo, which consists of the word "YOU" in white, uppercase, sans-serif font above the word "Tube" in blue, lowercase, sans-serif font. Both words are contained within a white rounded rectangle, which is itself centered within a larger blue rounded rectangle.

YOU
Tube

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Keep the Board of Athletic Training
Date: Tue Sep 05 2023 17:25:11 CDT
Attachments:

Committee members,

I strongly urge you to consider the health and safety of our student athletes at all levels of play and to that end maintain the Iowa Board of Athletic Training.

Athletic Trainers are highly educated health care professionals who are trained in recognition and treatment of emergent, acute and chronic injuries and illnesses. Licensing is a national standard for health care professionals to ensure individuals filling those roles are qualified and maintain continuing education to ensure highest quality of care for our adolescent, youth and young adult athletes, not to mention patient populations in dozens of other settings where ATs provide care. To reduce the standard regulation is take a step backward compared to the rest of the country. Saving lives and preventing injuries is not a place to cut corners.

There are countless examples across the state and the nation that highlight the critical role ATs have played in saving lives and reducing risk during catastrophic events from emergency cardiac arrest to c-spine injuries. Taking away AT licensure and opening those roles to anybody introduces unnecessary risk to the safety and well-being of the patients ATs serve.

I implore you to reconsider the elimination of the board of athletic training.

Thank you for your time and consideration of this vital issue.

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: ATC license
Date: Tue Sep 05 2023 17:31:35 CDT
Attachments:

To whom it may concern, please do not eliminate the ATC licensure in Iowa:

- * There are over 1,100 licensed athletic trainers in the state of Iowa.
- * The renewal fees that ATs pay fully funds the AT Board and is not a cost to the state.
- * The AT license protects the health, safety, and welfare of the public by ensuring that the ATs in the state are the qualified healthcare providers that athletes in Iowa deserve.
- * The AT Board evaluates our scope of practice and adapts that based on the rapidly changing world of healthcare. If the Board is eliminated, other healthcare providers will have influence over our scope of practice.
- * Other states, like South Carolina moved towards licensure. Thus 49/50 states have regulation. This action would make Iowa, like California, not requiring licensure for ATs.
- * The elimination of AT licensure may reduce the willingness of graduating students to stay in the state. It may also lead to currently licensed ATs leaving the state. We are already experiencing difficulty hiring ATs across the state, this would just increase the struggle, specifically in rural schools.
- * ATs appear in the Iowa Code as licensed healthcare providers, specifically in the recent concussion law that was signed, declaring ATs as licensed healthcare providers.

ATCs are a vital component of health care, especially in the field of sports medicine and by eliminating our license you would be doing a grave disservice to all those athletes!

[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Deregulation
Date: Tue Sep 05 2023 17:32:18 CDT
Attachments:

Dear Boards and Commissions Review Committee members,

I write to you today, as a licensed hearing aid specialists who provides hearing healthcare services to an increasingly growing population, to express my concern with the Boards and Commissions Review Committee Subcommittee's August 29, 2023, recommendation to eliminate the Board of Hearing Aid Specialists (herein referred to as "the Board").

The elimination of this Board will result in the unintended consequence of:

- Limiting/ lowering hearing healthcare access;
- Loss of licensure;
- Eliminating consumer protection;
- Compromised patient safety;
- Individual complacency;
- Reducing competition; and
- Laxed hearing healthcare industry standards.

This is because this Board – consisting of hearing healthcare industry experts- evaluates an individual's application for licensure and issues a license if the individual meets statutory, regulatory, and board requirements. Additionally, the Board promulgates regulations to ensure consumer protections from fraud and abuse and educational standards that aligned with current practices to best serve Iowa's hearing-impaired citizens. Furthermore, this Board investigates complaints about unprofessional conduct.

Eliminating this Board may be interpreted by the U.S. Food and Drug Administration (FDA) as eliminating the ability of licensed hearing aid specialists to order the use of prescription hearing aids. Late 2022, the FDA issued regulations recategorized "traditional hearing aids," which have been dispensed by licensed hearing aid specialists for decades, as "prescription medical devices," which must be "prescribed or ordered the use of" by a licensed hearing care professional; 21 C.F.R. § 801.109. Prescription hearing aids require a written or oral authorization from a practitioner licensed by law to administer the device (C.F.R. § 801.109).

It is for these reasons that it is paramount that Iowa maintains the Board of Hearing Aid Specialists.

Thank you for your attention to my concerns with eliminating the Board of Hearing Aid Specialists and I respectfully ask for your consideration. Please feel free to contact me if you would like to discuss this issue further.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Iowa Psychological Association
Date: Tue Sep 05 2023 18:10:52 CDT
Attachments: Iowa Psychological Association - Opposed to BOP consolidation.pdf

Subject: Opposition to the Consolidation of the Board of Psychology into a Board of Behavioral Health

The Iowa Psychological Association is a professional membership organization of doctoral-level psychologists practicing in Iowa. Our members are subject to the Board of Psychology, which is included in the list of recommended eliminations and consolidations. We are writing to express the strongest opposition to the proposed elimination of the Board of Psychology by consolidation into a Board of Behavioral Health. While we understand that efforts are being made to streamline government operations and reduce administrative costs, we believe that this particular consolidation would have significant detrimental effects on both the practice of psychology and the well-being of the individuals it serves.

Psychology is a profession with distinct principles, practices, and ethical standards. This proposed consolidation threatens to blur the boundaries between psychologists and other behavioral health professions (e.g., masters-level social workers, behavior analysts), potentially jeopardizing the integrity of our field and the quality of care received by our patients.

Here are the key reasons for our opposition:

Specialized Expertise: Doctors of psychology (Ph.D., Psy.D.) undergo rigorous training and education to provide specialized psychological assessment, therapy, and intervention. Merging the Board of Psychology into a broader Behavioral Health Board would dilute this unique expertise, undermining the qualifications required of psychologists.

Consumer Trust and Safety: Patients trust licensed psychologists to provide evidence-based, effective mental health services and critical testing, such as ID waivers and disability

evaluations. Psychologists have a broader scope of practice than master's-level professions, and should not be overseen by those who have a narrower scope of practice. It would be akin to having an ARNP supervise a physician or surgeon. Professions without advanced training in psychological/neuropsychological testing should not oversee such practice.

Professional Identity: Psychologists have a well-defined professional identity, and this consolidation would diminish that identity, making it harder for the public to distinguish psychologists from other mental health professionals.

Ethical Standards: Psychology has a code of ethics distinct from other mental health professions. Merging with a Behavioral Health Board could lead to conflicts over ethical standards when addressing ethics complaints. Moreover, it could create confusion among the public when different professions reach varying decisions based on their respective ethical frameworks. Each profession should adhere to its own professional code of ethics.

Representation: Consolidation could lead to reduced representation for psychologists on the Board, potentially disadvantaging the profession in decision-making and regulation. Given psychology's unique scope of practice, we do not believe it is appropriate for other mental health professionals to be in a position to control the practice of psychology or constrain the work of psychologists.

Board Recruitment: Recruitment has been cited as a rationale for consolidation, yet the Board of Psychology has generally been able to recruit and retain members from both the profession and the public. A larger board would likely require a greater time commitment, which might deter practitioners. The current structure allows for a manageable quarterly commitment, whereas a larger board might necessitate a full day or more for business.

We urge you to reconsider the consolidation proposal, emphasizing that while we acknowledge the potential benefits of consolidating master's-level professions, we strongly advocate for the retention of the Board of Psychology. Maintaining this distinct Board is crucial due to psychologists' broad scope of practice, more extensive training, and unique code of ethics and to the provision of competent care to lowans.

Thank you for your attention to this matter. I hope you will carefully consider the concerns raised by many within the psychology community and the potential negative consequences of this consolidation. Please feel free to contact me if you would like to further discuss this issue.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Owner:

[REDACTED]

Filename:

Iowa Psychological Association - Opposed to BOP consolidation.pdf

Last Modified:

Tue Sep 05 18:10:52 CDT 2023



Iowa Psychological Association

State Affiliate of the American Psychological Association

09/04/2023

Subject: Opposition to the Consolidation of the Board of Psychology into a Board of Behavioral Health

The Iowa Psychological Association is a professional membership organization of doctoral-level psychologists practicing in Iowa. Our members are subject to the Board of Psychology, which is included in the list of recommended eliminations and consolidations. We are writing to express the strongest opposition to the proposed elimination of the Board of Psychology by consolidation into a Board of Behavioral Health. While we understand that efforts are being made to streamline government operations and reduce administrative costs, we believe that this particular consolidation would have significant detrimental effects on both the practice of psychology and the well-being of the individuals it serves.

Psychology is a profession with distinct principles, practices, and ethical standards. This proposed consolidation threatens to blur the boundaries between psychologists and other behavioral health professions (e.g., masters-level social workers, behavior analysts), potentially jeopardizing the integrity of our field and the quality of care received by our patients.

Here are the key reasons for our opposition:

Specialized Expertise: Doctors of psychology (Ph.D., Psy.D.) undergo rigorous training and education to provide specialized psychological assessment, therapy, and intervention. Merging the Board of Psychology into a broader Behavioral Health Board would dilute this unique expertise, undermining the qualifications required of psychologists.

Consumer Trust and Safety: Patients trust licensed psychologists to provide evidence-based, effective mental health services and critical testing, such as ID waivers and disability evaluations. Psychologists have a broader scope of practice than master's-level professions, and should not be overseen by those who have a narrower scope of practice. It would be akin to having an ARNP supervise a physician or surgeon. Professions without advanced training in psychological/neuropsychological testing should not oversee such practice.

Professional Identity: Psychologists have a well-defined professional identity, and this consolidation would diminish that identity, making it harder for the public to distinguish psychologists from other mental health professionals.

Ethical Standards: Psychology has a code of ethics distinct from other mental health professions. Merging with a Behavioral Health Board could lead to conflicts over ethical standards when addressing ethics complaints. Moreover, it could create confusion among the public when different professions reach varying decisions based on their respective ethical frameworks. Each profession should adhere to its own professional code of ethics.

Representation: Consolidation could lead to reduced representation for psychologists on the Board, potentially disadvantaging the profession in decision-making and regulation. Given psychology's unique

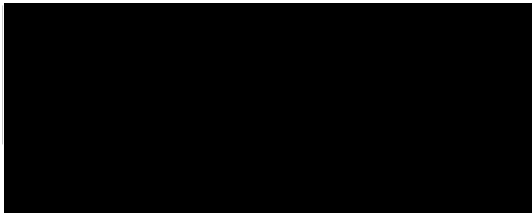
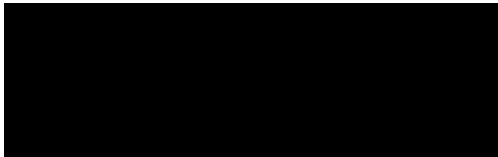
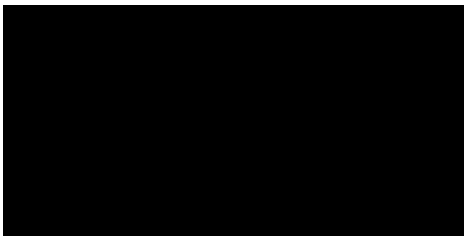
scope of practice, we do not believe it is appropriate for other mental health professionals to be in a position to control the practice of psychology or constrain the work of psychologists.

Board Recruitment: Recruitment has been cited as a rationale for consolidation, yet the Board of Psychology has generally been able to recruit and retain members from both the profession and the public. A larger board would likely require a greater time commitment, which might deter practitioners. The current structure allows for a manageable quarterly commitment, whereas a larger board might necessitate a full day or more for business.

We urge you to reconsider the consolidation proposal, emphasizing that while we acknowledge the potential benefits of consolidating master's-level professions, we strongly advocate for the retention of the Board of Psychology. Maintaining this distinct Board is crucial due to psychologists' broad scope of practice, more extensive training, and unique code of ethics and to the provision of competent care to Iowans.

Thank you for your attention to this matter. I hope you will carefully consider the concerns raised by many within the psychology community and the potential negative consequences of this consolidation. Please feel free to contact me if you would like to further discuss this issue.

Sincerely,

A large black rectangular redaction box covering the signature area.A black rectangular redaction box covering the first line of contact information.A black rectangular redaction box covering the second line of contact information.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Significant concern for proposed board changes
Date: Tue Sep 05 2023 18:11:57 CDT
Attachments:

To The Boards and Commissions Review Committee (BCRC)

I am reaching out with significant concern for two groups of healthcare providers in Iowa: Athletic trainers and registered dietitians.

The proposed abolishment of the Iowa board of Athletic Training and the Iowa Board of Dietetics would be a disaster for healthcare in Iowa. As a general pediatrician and sports medicine physician, these are two of the allied health groups I work most closely with on a day-to-day basis, and I can say with absolute certainty I would not be able to do my job without them.

Athletic trainers are crucial to our healthcare model, providing access, continuity and immediate health and safety capabilities for the patients they serve. They work closely with thousands of high school and college age athletes who are at risk for health events and injuries during sport practice or participation. In these scenarios they often act as the only medical professional on site. To reduce the licensure and oversight required for these individuals would put the health of these patients at risk. ATs require graduate medical training and 47 states and DC require AT licensure, and athletic training is a nationally recognized (AMA and HHS) health care profession. To become one of 4 states to lack this licensure and oversight would also make recruiting vital healthcare workers to Iowa harder than it currently is. This would affect all local high schools, colleges of all levels, many workplace health systems, athletic training educational programs at U of Iowa and elsewhere, orthopaedic and other medical clinics, and many other venues

Similarly, registered dietitians are crucial to the PREVENTION, recovery and treatment of many acute and chronic healthcare conditions. In an era of rising healthcare costs, access to

appropriate, qualified nutrition advice is vital. Registered dietitians are clinical healthcare allies who are trained in the management of these acute and chronic conditions, which sets them far above other levels of nutritional training which have muddied the waters through social media and other venues. I work daily with dietitians who help with patients establishing appropriate growth curves, eating disorders, diabetes, celiac disease among many others.

I cannot overstate what the Iowa Board of Athletic Training and Iowa Board of Dietetics does for our state. They are absolutely vital to the health and safety of patients and athletes across the state. and their elimination would be a tragedy. I hope the elimination of the Board of Athletic Training and Board of Dietetics is averted and reconsidered.

Sincerely,

[Redacted signature]

[Redacted contact information]

From:

[REDACTED]

To:

bcrccomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

[REDACTED]

Subject:

Athletic Training

[REDACTED]

To whom it may concern,

Please reconsider eliminating the Board of Athletic Training. Their licensure protects the public and lets their clients and employers know that Athletic Trainers are properly trained. The Board helps to provide the scope of practice guidance and protects the public from untrained individuals. Every other state besides Hawaii, they require registration, and California, who has pending legislation, require licensure. Thank you for your time and I hope this changes your mind.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Opposing Board Consolidation
Date: Tue Sep 05 2023 18:27:51 CDT
Attachments:

Please consider my comments. I oppose the proposal to eliminate the Board of Psychology and consolidate in under the Board of Behavioral Health. Psychologists stand apart from other behavioral health professionals and thus need a separate board to maintain the integrity of our profession. Not only is our skill set different from other mental health professionals, so are our ethics. This has been evident to me as I have supervised students and temporary licensed providers in the past. Please maintain the Board of Psychology so our professionals can continue to serve lowans with our professional integrity, not greater or less than other professions, but different.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

CONFIDENTIALITY NOTICE: This e-mail message and any documents attached to it are confidential and may contain information that is protected from disclosure by various federal and state laws, including the HIPAA privacy rule (45 C.F.R., Part 164). This information is intended to be used solely by the entity or individual to whom this message is addressed. If you are not the intended recipient, be advised that any use, dissemination, forwarding, printing, or copying of this message without the sender's written permission is strictly prohibited and may be unlawful. Accordingly, if you have received this message in error, please notify the sender immediately by return e-mail or call [REDACTED], and then delete this message.

CRISIS CONCERNS: If you are attempting to contact me via email and are in crisis, please call 911, other crisis hotlines (e.g., National Suicide Prevention Lifeline [REDACTED]), or go to the nearest emergency room. Please note that email is not an appropriate means of communication for crisis situations, as response times vary and cannot be guaranteed.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: DO NOT ELIMINATE LICENSURE FOR ATHLETIC TRAINING!!
Date: Tue Sep 05 2023 18:33:56 CDT
Attachments:

Hello,

My name is [REDACTED] and I am an athletic training student at the University of Iowa. I am opposed to the elimination of the Board of Athletic Training in the state of Iowa. Here are reasons why the licensure of Athletic Training should not be eliminated!

1. 47 states and the District of Columbia require licensure for athletic trainers.
2. Athletic Trainers are HEALTHCARE PROFESSIONALS who diagnose, prevent, intervene, and treat acute and chronic medical injuries. Why would you not want all Athletic Trainers to be licensed? Would you want your student athlete and child to be in the hands of a healthcare provider who doesn't have to be licensed?
3. Licensure provides the highest level of patient protection and is a standard form of regulation for health care professionals. Athletic Trainers are included under the allied health professions category as defined by the US Department of Health and Human Services. Are you willing to risk individuals' care based on health standards and regulations?

Thank You,
[REDACTED]

Get Outlook for iOS

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic Training Board
Date: Tue Sep 05 2023 18:54:35 CDT
Attachments:

Hello,

My name is [REDACTED] and I am writing in opposition to eliminating the Board of Athletic Training in the State of Iowa. As a dual-credentialed athletic trainer and physical therapist, I do not believe this action is fair to athletic trainers. The scope of practice of both healthcare providers is protected by licensure; eliminating licensure for athletic trainers is a safety concern and liability to all the people athletic trainers provide their services to. I was just on the sidelines of a high school football game on Friday night, and I have the utmost respect for the athletic trainers I had the privilege of sharing the sideline with. There were many people on the sideline that night; it would have been unfair and unsafe for those athletes to have had a random person claiming to be an "athletic trainer" providing healthcare services to them. This is why we need athletic trainers to maintain their licensure.

Eliminating the board of athletic training would not allow for the scope of practice of athletic trainers to evolve and change as the research changes, which is vital to providing the best up-to-date and evidence-based care for patients. Without protection from the Board, other professions, such as physical therapists and chiropractors, will have far too much say on what athletic trainers can and cannot do. Being both an athletic trainer and physical therapist, I understand what athletic trainers can and cannot do; most physical therapists do not and therefore should not influence the scope of practice of athletic trainers.

The state of South Carolina has recently moved towards licensure of athletic trainers in their state. Currently 49/50 states have licensure for athletic trainers. California is the only state that currently does not have licensure. I have seen enough comments from athletic trainers with stories of actual random people trying to provide care for athletes and patients under the guise of being an "athletic trainer" in California that I would never encourage a new graduate or anyone really to seek employment in the state of California as an athletic trainer. Do we really want that to happen in our own state? There are athletic trainer shortages in Iowa as it is; eliminating licensure would further encourage new graduates and athletic trainers in general to seek employment elsewhere.

Overall, eliminating licensure for athletic trainers only harms the people that athletic trainers serve. If other licensed healthcare providers are protected by licensure, athletic trainers should be too in order to provide the highest level of care.

Thank you,
[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Board Consolidation Comments
Date: Tue Sep 05 2023 18:58:56 CDT
Attachments:

To whom it may concern:

As a Clinical Psychologist, I have concerns with eliminating the Board of Psychology for several reasons, but most notably because:

1. Psychologists have a broader scope of practice than master's-level professions, and should not be overseen by those who have a narrower scope of practice. How can professions without advanced training in psychological/neuropsychological testing oversee such practice?
2. There exists already much confusion regarding the various identities of mental health professionals, and eliminating the Board would only add to this.
3. Psychologists are governed by an Ethics Code that is noticeably different from other mental health professions. Combining Boards would only lead to more conflicts over ethical standards when addressing ethics complaints.

Sincerely,

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Letter opposing consolidation of Board of Psychology
Date: Tue Sep 05 2023 19:10:13 CDT
Attachments: Letter re_ Opposition to the Consolidation of the Board of Psychology.pdf

To whom it may concern:
Please see the attached letter sharing my grave concerns regarding the proposal to consolidate the Board of Psychology by merging it into the Board of Behavioral Sciences.
Thank you,
[REDACTED]

--

To ensure compliance with the Health Information Portability and Accountability Act "HIPAA", this message is intended only for use of the individual or agency to which it is addressed and may contain information that is privileged, and confidential. If the recipient of this electronic message is not the intended recipient, employee or agent responsible for delivering the message to the intended recipient, received this communication in error or it was forwarded to you without permission from Dr. Phillips, please DELETE this message from all mailboxes and any other electronic storage and DESTROY all copies. Thank you.

Owner:

[REDACTED]

Filename: Letter re_ Opposition to the Consolidation of the Board of Psychology.pdf

Last Modified: Tue Sep 05 19:10:13 CDT 2023



9/5/23

Subject: Opposition to the Consolidation of the Board of Psychology into a Board of Behavioral Health

To whom it may concern:

I am a Licensed Psychologist in the state of Iowa who has practiced here since 1998. I am writing to express the strongest opposition possible to the proposed elimination of the Board of Psychology by consolidating it into the Board of Behavioral Health.

While I understand this administration's desire to reduce administrative costs in an attempt to increase efficiency, attempting to do this by consolidating the Psychology Board into all other mental health professions is a dangerous method that will put both the field of Psychology and the public at risk.

Psychologists attend graduate training for 4 to 5 years, then complete a 1 year internship that is accredited and structured by the American Psychological Association and then typically complete an additional full year of Psychology Residency before then taking a national qualifying examination to become a Licensed Psychologist. Our training is far more extensive than most other mental health professions, which license at a Master's level, and consists of broad and unique training in research, psychotherapy with individuals, couples, and families as well as extensive training in conducting psychological testing. No other mental health profession receives this intensive level of training or the unique training in psychological testing that is specific to our profession.

Psychology is a profession with distinct principles, practices, and ethical standards that are not the same as those in other behavioral health professions (e.g., masters - level social workers, mental health counselors, marital and family therapists, behavior analysts). Attempting to combine all mental health professions under one board blurs the boundaries between these professions and potentially jeopardizes the quality of care delivered to our patients.

Merging the Board of Psychology into a broader Behavioral Health Board would dilute the unique expertise of Psychologists, undermining their qualifications and further blurring the boundaries and increasing confusion in the general public as to what different mental health professionals do. Patients in Iowa look to Licensed Psychologists for empirically supported interventions and critical psychological testing services that help Iowans receive State Waiver program services (i.e., ID waiver), Iowa Disability services, and critical learning disability evaluations for children and teens in Iowa. Having multiple mental health professionals governed by

223 S. Walnut Avenue
Ames, IA 50010
(515) 233-1122

215 N.W. 18th St., #102
Ankeny, IA 50023
(515) 515-348-8258

3737 Woodland Ave, #415
West Des Moines, IA 50266
(515) 222-1999

www.iowacounseling.com

the same board increases the likelihood that multiple members of that board would not be equally trained, or trained at all, in psychological testing and research-based services that are specific to our field.

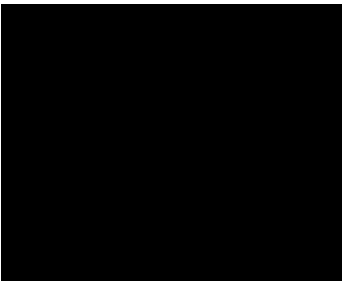
Because Psychology has a code of ethics distinct from other mental health professions merging the Psychology board into a broader Behavioral Health Board will lead to conflicts over ethical standards when addressing ethics complaints and could lead to reduced representation for psychologists on the board, disadvantaging the profession in decision - making and regulation. Given psychology's unique scope of practice, I do not believe it is appropriate for other mental health professionals to be in a position to control the practice of psychology or constrain the work of psychologists.

I strongly urge you to reconsider the consolidation proposal. While I have worked with many Master's level practitioners for over 20 years and have respect for the services they provide, I must emphasize the important differences between the services provided by Master's level practitioners and Licensed Psychologists.

I strongly advocate for the retention of the Board of Psychology in order to continue to provide adherence to the highest ethical standards possible, to ensure that lowans receive the best possible protection, and to ensure the provision of competent care to lowans. Thank you for your attention and I hope you will carefully consider my concerns as well as the potential negative consequences of this consolidation.

Please contact me if you have any questions or would like to discuss this matter further.

Respectfully,



From: [REDACTED]
[REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc: [REDACTED]
Subject: Letter of Support- Iowa Athletic Training Licensure
[REDACTED]

Please see attached for our letter of support.

Best,

Letter of Support- Iowa

--

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From:

[REDACTED]

To:

bcrccomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Bcc:

Subject: Speakers list

Date: Tue Sep 05 2023 19:59:35 CDT

Attachments:

Please add to the list of speakers.

Thanks!

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc: [REDACTED]
Subject: Iowa Athletic Training Licensure
[REDACTED]

To The Boards and Commissions Review Committee (BCRC):

I am reaching out with significant concern for Athletic Training in Iowa. The proposed abolishment of the Iowa board of Athletic Training would be a huge mistake for healthcare in Iowa. I work with athletic trainers (ATs) every day in clinic, in the athletic training rooms and on the athletic fields/courts. I am a Team Physician for the University of Iowa Hawkeyes and also provide medical oversight for Iowa City High School. ATs are absolutely crucial and integral to the health and safety of our youth athletes in the high school and college setting. ATs specialize in dealing with urgent medical situations in sports but also in unique settings such as factories and the military. ATs require graduate medical training and 47 states and DC require AT licensure, and athletic training is a nationally recognized (AMA and HHS) health care profession. This licensure is crucial for maintaining appropriate training and scope of practice. We already have a relative shortage of ATs in our state. Losing our state licensure and oversight would make hiring ATs here even more challenging. This would affect all local high schools, colleges of all levels, many work place health systems, athletic training educational programs at U of Iowa and elsewhere, orthopedic and other medical clinics, and many other venues.

I cannot support what the Iowa Board of Athletic Training does enough. It is absolutely vital to the health and safety of patients and athletes across the state. It's elimination would be an absolute disaster. I hope the elimination of the Board of Athletic Training is averted and reconsidered.

Regards,

[REDACTED]
[REDACTED]

[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Retain Midwifery Advisory Council
Date: Tue Sep 05 2023 20:14:31 CDT
Attachments:

Please work to retain the Midwifery Advisory Council. This state is in dire need of maternal health providers and just worked to pass licensure for CPMs in an effort to correct that need. To remove the advisory board before even giving it a chance to begin would be extremely short-sighted.

This board will aid in providing access to care for expectant mothers, something that all Iowans, especially those claiming to care about the unborn should be in favor of.

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc: zach.wahls@legis.iowa.gov
<zach.wahls@legis.iowa.gov>; david.jacoby@legis.iowa.gov
<david.jacoby@legis.iowa.gov>
Bcc:
Subject: Board of athletic training
Date: Tue Sep 05 2023 20:28:04 CDT
Attachments:

To whom it may concern,

My name is [REDACTED] and I am a clinical athletic trainer at the University of Iowa Hospitals and Clinics Orthopedics Department. I am also a resident of Coralville, Iowa, a Board Certified and Iowa Licensed athletic trainer, and a preceptor within the MSAT program at the University of Iowa.

I have been made aware of the possibility that you will be eliminating the Licensure Board, and subsequently, the licensure for Athletic Trainers in the state of Iowa. I am reaching out to comment on these proposed changes to committees/boards in our state. It is alarming to imagine what this would do to the safety of athletes in our state. Athletic trainers provide medical services to all types of patients. Across the United States, in addition to practicing in traditional sports team settings, athletic trainers work in performing arts, public safety, occupational health, and with the armed forces Athletic trainers are allied healthcare professionals who play a vital role in the safety of young athletes playing sports in our state on a daily basis, through youth sports to high schools and at the collegiate level.

The presence of athletic trainers allows coaches to coach and a licensed health care providers to prevent, evaluate, treat, and rehabilitate injuries. Additionally, should an emergency occur on the field or playing surface, athletic trainers have training in immediate care and activation of emergency action plans/response. Finally, and more specifically, with concussion care being such an important and vital topic, having trained professionals who can diagnose and treat head injuries accurately and effectively is necessary for safe participation in sports.

If the licensing system for athletic trainers was removed, it would be up to the hiring schools or hospitals to determine the viability of an individual to be an athletic trainer. This means that those who may not have a background or education in healthcare will be charged with determining who is qualified to provide healthcare to our athletes and patients.

By eliminating the licensure system for our state, we would only rely on the Board of Certification (BOC) exam as a way of assessing the quality of an athletic trainer. While this examination is designed to protect the public by screening recent graduates of basic knowledge and skill, we need a means for our state to monitor athletic trainers and ensure continuing education. This is necessary for public protection as best practices evolve over time and without up to date knowledge, the safety of athletes, and even the general public, is

endangered.

Across the US, 49/50 states have some form of regulation of the profession of athletic training. The one remaining state has an active bill that would require regulation of the practice of athletic training. Licensure is required in 47/50 states.

As an athletic trainer that has worked at the collegiate level both DI and DIII in the state of Iowa, and now in the clinical setting with occasional outreach, it is vital that we have individuals who are charged with athlete and public safety who are regulated with their licensure to make sure they are up to date on the best practices and latest research for emergency care and patient care.

Finally, as a parent, I want my kids to be safe when playing in sports. I know injuries will happen, but I expect the school or organization to have the properly trained individuals on site to provide care. Removing the Board of Athletic Training and licensure system takes away an important and effective means to ensure qualified individuals are providing that care.

I urge you to vote against getting rid of the athletic training licensure board.

Thank you for your time.

Best,

[Redacted signature]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Iowa Athletic Training Licensure
Date: Tue Sep 05 2023 20:31:55 CDT
Attachments:

The news of the proposed elimination of the Board of Athletic Training is not only disappointing, it is discouraging to the over 1,100 licensed athletic trainers currently in the state of Iowa.

The Board of Athletic Training evaluates our scope of practice and continually adjusts the guidelines to follow the rapidly changing world of healthcare. Being a licensed healthcare professional instills confidence in the public that we are qualified providers of care in addition to protecting the health, safety, and welfare of those we serve.

The requirement of obtaining a master's degree in order to become certified shows the dedication and competence required to be an athletic trainer; requiring a licensure protects us not only as individuals, but as a profession. Removing the Board of Athletic Training and subsequent licensure devalues the knowledge and expertise we have trained our whole careers to refine.

Our renewal fees fully fund the board and there is no cost to the state, what could possibly be gained from this? Nothing but hurting the careers of the athletic trainers who chose to practice in Iowa.

Thank you for your time,

[REDACTED]

From:

[REDACTED]

To:

bcrccomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Subject:

Proposed merging of Psychology Board with other mental health boards

To Whom It May Concern:

I strongly oppose the proposed merging of the Psychology Board with other mental health boards. As a former Chair of the Psychology Board, I am well aware of the important work the board engages in to protect lowans and to regulate the profession of psychology. The Iowa Psychological Association has provided a detailed letter outlining the various ways the merging of boards diminishes the professional identity of psychologists and ultimately reduces the board's ability to protect lowans. As a former chair I'm also aware of concerns about barriers to licensure, and how access to mental health professionals also impacts the public. I believe there is a better way to reduce administrative barriers to licensure without diminishing the professional identity of psychologists (or the other mental health professionals that are proposed to merge into a larger board) or compromising public safety.

Please reconsider this course of action- I believe it will lead to more disruption and barriers to professionals applying for licensure in this state as well as barriers to public safety.

Please feel free to contact me if you have any questions or if I can elaborate on my experiences as a licensure board chair or concerns about psychology professional regulation.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] ||

This email message and any attachment(s) transmitted with it are intended only for the use of the recipient(s) named above. This message may contain privileged and confidential information, including patient information protected by federal and state privacy laws. If you are not an intended recipient, you may not review, copy or distribute this message. If you have received this message in error, please notify the sender immediately by reply email and delete the original message.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Opposition to Consolidation of the Board of Psychology into a Board of Behavioral Health
Date: Tue Sep 05 2023 20:52:26 CDT
Attachments:

I am writing to express opposition to the proposal to eliminate the Board of Psychology and to fold oversight of licensure, legal and ethical concerns, and discipline to a board of varied behavioral health disciplines.

Many licensed psychologists have additional years of training (such as a post-doctoral fellowship) in specialties which may not be familiar to other behavioral health professionals, most of whom have two years of graduate training and no training in psychological evaluation. The other behavioral health disciplines are not like master's level psychologists.

My chief concern is whether the governing board will have depth of understanding and experience to make serious decisions about diverse specialties such as pediatric and geriatric neuropsychology, various types of forensic evaluation (e.g., fitness for duty for pilots and police officers; child custody evaluations; disability evaluations; and evaluation of personality, cognition, and learning disabilities).

Similarly, psychologists may not understand some professional issues involved in social work or licensed mental health counseling; the training programs of those professions do not have much in common with the training programs or work experiences of psychologists.

Another concern is that the absence of a Board of Psychology will be promptly noted by psychologists considering a move to Iowa and may be a disadvantage to those trying to bring more psychologists into the state. This proposed merger would be akin to proposing that physicians and physical therapists should be regulated by the same board. It could make Iowa look like a place where psychologists do not want to work.

Thank you for considering this perspective.

Sincerely,



From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Licensure Boards
Date: Tue Sep 05 2023 20:59:04 CDT
Attachments: Letter to Board and Commission Review Committee.doc

September 5, 2023

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

Owner:

[REDACTED]

Filename: Letter to Board and Commission Review Committe.doc

Last Modified: Tue Sep 05 20:59:04 CDT 2023

[REDACTED]

[REDACTED]

September 5, 2023

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.

This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions

We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: AT Licensure
Date: Tue Sep 05 2023 21:05:48 CDT
Attachments:

To whom it may concern,

I am emailing regarding the state's intention to eliminate the licensing requirements for Athletic Trainers in Iowa. I directly benefitted from a licensed athletic trainer while in high school. My school was fortunate enough to have a licensed athletic trainer who was skilled, competent, and qualified to provide an impressive level of care. The licensing requirements and continuing education requirements have required her to maintain this high level of care years after finishing her graduate program. I have now had the privilege to work with her as a coach and have a much deeper appreciation for the level of skill, education, and quality of care standards she is held to. She is able to provide this care because of the licensure requirements in the state and has clear and distinct roles within sports teams. She is able to provide quality care that unlicensed ATs are not able to provide.

Eliminating the licensure requirements for athletic trainers would be the equivalent of eliminating the licensure requirements for nurses and other healthcare providers. It puts student-athletes at risk of providing low-quality or risky healthcare. Licensed ATs ensure concussion protocol, heat stroke protocol, and other essential sports-related healthcare standards are followed.

Elimination of the licensure requirements for ATs is dangerous and would adversely affect the youth of Iowa.

Thank you,
[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Fw: Medical Provide Certification
Date: Tue Sep 05 2023 21:17:22 CDT
Attachments:

9/5/29

Subject: Opposing the Elimination of the Board of Athletic Training

Dear Representative Bisignano,

I hope this letter finds you in good health. I am writing to express my deep concern and strong opposition to the proposed elimination of the Board of Athletic Training. As a parent and coach of young athletes, I believe that the existence of this board plays a crucial role in ensuring the safety and well-being of our children participating in sports.

Many of the young athletes I have raised and mentored have been enthusiastic and dedicated athletes who has been involved in various sports activities for several years. Like many parents, I want nothing more than to see my child pursue their passion safely and with the best possible care. The Board of Athletic Training plays an essential role in this endeavor by setting and enforcing high standards for athletic trainers, which directly impacts the safety and health of young athletes.

Here are a few reasons why I believe the Board of Athletic Training should be preserved:

1. **Safety First:** Athletic trainers are instrumental in preventing, diagnosing, and treating injuries that young athletes may encounter during their training and competitions. The board ensures that these professionals are qualified and competent, which is vital for our children's safety.
2. **Quality of Care:** The board regulates the education and certification of athletic trainers, ensuring that they receive proper training and stay up-to-date with the latest techniques and best practices. This guarantees that our young athletes receive the best possible care when they need it most.
3. **Accountability:** The existence of the board creates a system of accountability for athletic trainers. Parents like me can have confidence that there are established standards and disciplinary procedures in place to address any misconduct or negligence.
4. **Preventing Unqualified Practitioners:** Eliminating the board could open the door for unqualified individuals to enter the field of athletic training, putting our children at risk. It is crucial to maintain a rigorous certification process to protect their well-being.

I understand that there may be budgetary considerations and discussions about streamlining government agencies, but I urge you to consider the potential consequences for our young athletes. The safety and health of our children should always be a top priority.

I kindly request that you oppose any efforts to eliminate the Board of Athletic Training and work to ensure its continued existence and effectiveness in safeguarding our young athletes. I would appreciate your support on this matter, as it is of utmost importance to parents like me who want nothing but the best for our children.

Thank you for your attention to this critical issue. I look forward to hearing about your stance and any actions you may take to preserve the Board of Athletic Training.

In conclusion, I ask you to consider one thing, if it were your child, who would you prefer providing medial assistance to your child?

Sincerely,

[Redacted]

[Redacted]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic Training Licensure
Date: Tue Sep 05 2023 21:17:31 CDT
Attachments:

I am writing this email in support of the Athletic Training Licensure Board. This board is a valuable asset to the State of Iowa. Back 50 years ago I wish we would have had Athletic trainers who cared about their athletes as much as they do now. Back then all we had was untrained coaches who would tape us up and put us back on the field. The coaches didn't understand the injuries or how to treat them. Or how to get the athlete safely back on the field, With the increased focus on concussions these professionals are needed more than ever. They monitor the progress of the athlete, consult with the treating physician, and are responsible for following the guidelines for the athlete to safely return. Believe me, coaches and administrators do not want this responsibility. I implore you to not go backwards and put our athletes in jeopardy. Please do not enter the dark ages with injuries like it was 50 years ago

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Opposition to the elimination of the Board of Psychology
Date: Tue Sep 05 2023 21:21:37 CDT
Attachments:

As a licensed psychologist who has served the people of the state of Iowa for over 24 years, I am writing to express my strong opposition to the elimination of the Board of Psychology. It is essential that the practice of psychology continue to be overseen by other licensed psychologists who are familiar with the APA Ethical Principles and Code of Conduct, the document that guides psychologists' conduct throughout the United States. While there are potential cost savings, a broader Board of Behavioral Health would fail to provide the level of expertise necessary to protect the people we serve.

I strongly recommend that the Board of Psychology be maintained. Thank you.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

From:

[REDACTED]

To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

Bcc:

Subject: Iowa Chiropractic Licensure Board

Date: Tue Sep 05 2023 21:27:31 CDT

Attachments:

September 5, 2023

Dear Iowa Board and Commission Review Committee:

I do not agree with the proposed combining of the Iowa Board of Chiropractic with any other professional board. The Chiropractic Board is an active board with a need for quarterly meetings with the goal of protecting chiropractic patients. The volunteers who serve on this board currently have meetings that last 3 to 6 hours not including hearings. The hearings take additional time and/or days out the office for the board member. Chiropractic is unlike any other profession and needs a board of dedicated chiropractors (who understand the profession) and public members to properly review the cases that come before the board. In addition, the Chiropractic Board struggles to get adequate investigations going in a timely matter to protect our profession and the public. Merging the Chiropractic Board will make the investigation delays worse.

Thank you for considering my public comment. I ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Iowa Needs A Board of Athletic Training and Licensure
Date: Tue Sep 05 2023 21:48:28 CDT
Attachments:

Good evening,

I hope this email finds you well. I am writing to express my deep concerns regarding the recent recommendation to dissolve the Board for Athletic Training. As a dedicated member of our community and a strong advocate for the health and well-being of our athletes, I believe this decision poses significant risks to both the safety of our athletes and the credibility of our state's athletic training programs.

The Board for Athletic Training has played a crucial role in regulating and overseeing the practice of athletic training in our state for many years. Its dissolution not only jeopardizes the safety of athletes but also hinders the growth and development of the athletic training profession. Here are a few reasons why this decision is troubling:

1. **Safety of Athletes**: Athletic trainers are an essential part of ensuring the health and safety of athletes, from high school sports to professional leagues. The board's regulatory oversight helps maintain high standards of education, certification, and ethical conduct among athletic trainers, ultimately ensuring that athletes receive the best possible care.
2. **Professionalism and Accountability**: The board ensures that athletic trainers adhere to a strict code of ethics and maintain up-to-date certifications. Dissolving the board could lead to a lack of accountability and professionalism within the profession, potentially putting athletes at risk.
3. **Public Trust**: Maintaining a dedicated board for athletic training instills public trust and confidence in the profession. Without this oversight, it may become challenging for athletes, parents, and the public to have confidence in the quality of care provided by athletic trainers.
4. **Economic Impact**: The dissolution of the board could have negative economic consequences for our state. Athletic trainers contribute to the healthcare industry and sports programs, and their absence or reduced credibility could harm the economy.

I respectfully urge you to reconsider the decision to dissolve the Board for Athletic Training. Instead, I propose a thorough review and restructuring of the board to address any concerns or issues that may have led to this decision. By working together to improve the board's effectiveness and efficiency, we can ensure that our athletes receive the highest level of care and that the athletic training profession remains reputable.

I am more than willing to discuss this matter further and provide any additional information or insights that may be helpful. Your support in preserving the safety and integrity of athletic training in our state is greatly appreciated.

Thank you for your time and attention to this critical issue. I look forward to hearing from you and working together to find a solution that benefits our community and its athletes.

Sincerely,

[Redacted]

[Redacted]

From: [REDACTED]
[REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Board mergers elimination
Date: Tue Sep 05 2023 22:30:15 CDT
Attachments:

As a psychologist, I have interacted with the Psychology Board many times. I found the licensing process to be clear and efficient. However, I am open to the possibility of a more efficient and streamlined process for overseeing licensures.

Subsuming the psychology board under the behavioral sciences board could work if there were a subcommittee for psychologists and a subcommittee for master's level practitioners (mental health counselors, marriage and family therapists, and social workers). It is unrealistic to expect practitioners in one field to appreciate the norms and be in touch with the expectations, professional standards, and new training guidelines in professions they have not operated.

Psychologists require different coursework, internship requirements, and post-doctoral training than social workers, mental health counselors, and marriage and family therapists. A subcommittee for psychologists could offer specific training guidelines or academic requirements that would resolve the issue of professional knowledge. The Behavioral Sciences Board could then set uniform guidelines for CE submissions, license submissions, and other standardizations that would ease the burden on the state government.

My other concern is that consolidating boards could decrease efficiency if board members have conflicting agendas. For example, combining physicians and nurse practitioners or athletic trainers and physical therapists in a single board might lead to increased conflict and gridlock rather than greater efficiency, given that these professions compete with each other in the professional world. A merger is beneficial if the professions want to merge or if no specialized knowledge or professional training is required in a field.

Please make these changes carefully and thoughtfully rather than expediently. Being efficient requires careful research and planning and should not be done on such a short timeline.

Kind Regards,

--

[REDACTED]

Confidentiality Notice: Please note that email is not a secure form of communication and that confidentiality cannot be guaranteed. Please contact me by phone to discuss confidential information. Information in this email may be of a confidential or privileged nature and is intended only for the use of the addressee(s) named above. If you are not the intended recipient or an authorized agent of the recipient, please be advised that any dissemination or copying of this email or taking of any action in reliance on the information contained herein, is strictly prohibited. If you have received this email in error, please notify me immediately by using the reply button, and then delete the email from your system. Thank you.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic Training Board and Licensure
Date: Tue Sep 05 2023 22:40:15 CDT
Attachments:

Dear members of the Boards and Commissions Review Committee,

My name is [REDACTED] and I am currently an athletic trainer at the University of Iowa Hospitals and Clinics Sports Medicine Center with split appointments within the clinic's Community Outreach and the University of Iowa Athletics Department acting as the primary medical care provider to the University of Iowa Women's Tennis team.

I am writing you to strongly object to the elimination of the Board of Athletic Training and licensure of athletic trainers within the state of Iowa. Athletic trainers are health care professionals who specialize in the mitigation, diagnosis, management, and treatment of injuries and illnesses that identify as acute, insidious, and chronic. Athletic trainers are versatile, prepared, and most importantly – vigorously educated and trained to provide safe and evidence-based care in an expansive, diverse, and sometimes remote (i.e., rural) settings to some of our most vulnerable patient populations (i.e., patients with intellectual or physical disabilities, patients experiencing functional limitations, minors, etc.) who may otherwise not have direct access to regulated and trusted health care. To eliminate licensure and a healthcare profession's board would be to share the sentiment that patients do not deserve a standard of health care – that our youth's population does not deserve a licensed health care professional on the sidelines prepared to perform lifesaving measures; that industrial workers don't deserve the protocols created and enforced by athletic trainers under federal legislature that aim to mitigate overuse injuries, fatal injuries, and safety concerns; and that the advocacy and educational efforts aiming to protect and improve overall wellness are insignificant. The potentially new and lowered standard is unacceptable and by eliminating regulation on the athletic training licensure and practicing board, the state of Iowa will have communicated that it is acceptable to not only potentially eliminate the aforementioned examples of positive impact that athletic trainers make, but also that it is acceptable to allow anyone to self-proclaim they are a health care provider.

If elimination of the board and licensure were to pass, Iowa – with California – would become only the second state in the United States that allows for individuals to wrongfully identify as a health care provider or even allow athletic trainers who have previously lost their licensure in other states to practice in Iowa. To allow this to occur would be to negate the importance of following the gold standard of health care regulation; where all practitioners are required to meet the basic standards of education, training, and mentorship. Furthermore, Iowa would be denying to recognize that athletic trainers are also defined as healthcare professionals by national organizations including the U.S. Department of Health and Human Services (HHS)

and the American Medical Association (AMA) with National Provider Identifier numbers (NPIs).

To face the reality that patients – of all diverse or socioeconomic standing – within various settings might be receiving unsafe and improper medical care is a massive disappointment that when returning to Iowa where I earned my degree in this profession as an athletic trainer seemed irrational. The potential loss of athletic trainers in this state or profession and limitations that placed upon the practice and therefore impact of athletic trainers – even across state lines when traveling (e.g., with collegiate athletic teams) – would be a major regression that lowers access to health care in an immeasurable number of ways.

Despite my frustration and disappointment, I understand the goal is partly to better streamline and organize boards. Therefore, a compromise that would continue regulation of and practice of a safe, high standard of care provided by athletic trainers is merging the board and its standards of athletic trainers with those of physical therapists, occupational therapists, and related professions.

Please let me know if I can further expand on anything. I can be reached by cell phone at [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Opposition to the consolidation of the Board of Psychology
Date: Tue Sep 05 2023 22:42:18 CDT
Attachments:

Hello,

I am writing to strongly voice my opposition to the consolidation of the Board of Psychology. The Iowa Psychological Association (IPA) has provided a detailed list of reasons psychologists should maintain their own board; I concur with the positions and rationale outlined by IPA.

My primary concern is that a board consisting of providers from different backgrounds could lead to blurring of lines between professions. Non-doctoral level psychologists should not oversee the practice of doctoral level psychologists. The scope of practice, theoretical frameworks, ethical standards, and training is different from field to field. Combining them into one board could lead to confusion, inappropriate decisions, and a decline in the attractiveness of practicing in the state of Iowa.

Please consider maintaining the Board of Psychology as a separate, independent board.

Thank you,

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: Bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: BCRC draft- dietetics and athletic trainers
Date: Tue Sep 05 2023 22:50:57 CDT
Attachments:

Dear review committee,

I am a psychiatrist in Iowa. I learned of draft recommendations to eliminate 140 boards, including the Iowa Board of Athletic Training and Iowa Board of Dietetics.

These fields need to have regulation via board licensure in the state level. I work with colleagues in these fields. Dieticians are key to recovery from eating disorders. We need to recruit well trained health professionals that meet safe standards.

Sincerely,

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Opposition to the Proposed Consolidation of the Board of Psychology
Date: Tue Sep 05 2023 23:06:55 CDT
Attachments:

Hello,

The Board of Psychology is included in the list of recommended eliminations and consolidations. As a clinical psychologist, health service provider, and conditional prescribing psychologist in Iowa, I am writing to express the strongest opposition to the proposed elimination of the Board of Psychology by consolidation into a Board of Behavioral Health. This particular consolidation would have detrimental effects on both the practice of psychology and the well-being of the individuals it serves. Psychology is a profession with distinct principles, practices, and ethical standards. This proposed consolidation would blur the boundaries between psychologists and other behavioral health professions (e.g., masters-level social workers, behavior analysts), potentially jeopardizing the integrity of our field and the quality of care received by our patients. Doctors of psychology (Ph.D., Psy.D.) undergo rigorous training and education to provide specialized psychological assessment, therapy, and intervention. Merging the Board of Psychology into a broader Behavioral Health Board would dilute this unique expertise, undermining the qualifications required of psychologists. Psychology has a code of ethics distinct from other mental health professions. Merging with a Behavioral Health Board could lead to conflicts over ethical standards when addressing ethics complaints. Moreover, it could create confusion among the public when different professions reach varying decisions based on their respective ethical frameworks. Each profession should adhere to its own professional code of ethics.

In addition, patients trust licensed psychologists to provide evidence-based, effective mental health services and critical psychological testing, such as ID waivers and disability evaluations that are not within the purview or scope of practice of masters level clinicians. Masters level clinicians do not have comparable training or education and psychologists have a broader scope of practice overall. Therefore, masters level mental health professionals of different disciplines should not oversee licensed psychologists. It would be akin to having a physician assistant or advanced nurse practitioner supervise a physician or surgeon. Professions without advanced training in psychological/neuropsychological testing should not oversee such practice. Furthermore, psychologists have a well-defined professional identity, and this consolidation would diminish that identity, making it harder for the public to distinguish psychologists from other mental health professionals. Consolidation could lead to reduced representation for psychologists on the Board, potentially creating a disproportionate and frankly unethical grouping of professionals making decision-making and regulation to those that are outside their scope of practice. Given psychology's unique scope of practice, I do not believe it is appropriate for other mental health professionals to be in a position to control the practice of psychology or constrain the work of psychologists.

As a doctor of psychology proudly serving lowans, I strongly urge you to reconsider the consolidation proposal and advocate for the retention of the Board of Psychology. Maintaining this distinct Board is crucial due to psychologists' broad scope of practice, more extensive training, and unique code of ethics and to the provision of competent care to lowans. Thank you for your attention to this matter. I hope you will carefully consider the concerns raised by many within the psychology community, along with the negative consequences of this consolidation on the safety of the general public and the profession of psychologists. Please feel free to contact me if you would like to further discuss this issue, 515-518-7241.

Best,

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

CONFIDENTIALITY NOTICE: This email is covered by the Electronic Communications Privacy Act, 18 USC/2510-2521, is confidential, and may be legally privileged. If you are not the intended recipient, you are hereby notified that any retention, dissemination, distribution, or copying of this communication is strictly prohibited by law. Please reply to the sender that you have received it in error, then delete it. FURTHERMORE, even if you are the intended recipient and this communication contains mental health information, it is still protected, confidential information under Federal law (42 CFR Part 2) and Chap. 228 and Sec. 141.23(3) of the Iowa Code. Further disclosure of this information without appropriate authorization is unlawful and subject to civil and criminal penalties. A general release of medical information is NOT sufficient for this purpose.

Please be advised that e-mail communication is not perfectly confidential, by responding you assume all risks that the medium may present, including without limitation, hacking, electronic interruption or interception by persons known or unknown, local or not, the distribution of personal information so gained on the internet, and any other risk to privacy, personal information or other e-mail communication.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Opposition to the Consolidation of the Board of Psychology into a Board of Behavioral Health
Date: Tue Sep 05 2023 23:23:28 CDT
Attachments:

I want to state my opposition to the proposed elimination of the Iowa Board of Psychology and consolidate it into a broad board of behavioral health. I wholeheartedly support the position of the Iowa Psychological Association as stated in an excellent letter dated 09/05/23, written by [REDACTED], delineating the many reasons why this proposed piece of the overall effort to "streamline" state government is ill-informed and, ultimately, is a disservice to the lowans the Board of Psychology serves.

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Regarding the Boards and Committees Review Committee Recommendations
Date: Tue Sep 05 2023 23:37:09 CDT
Attachments:

Dear Members of the Boards and Commissions Review Committee;

My name is [REDACTED] and I am a Registered Dietitian Nutritionist, Licensed to practice in the state of Iowa. I wish to make it known that I am opposed to the sub committee's recommendation for the dissolution of the Iowa Board of Dietetics, as this action is opposed to Article 1, Section 2 of the Constitution of the State of Iowa wherein the Government of this state is instituted for the protection, security, and benefit of the people. This is not about restraint of speech, or about imposing onerous burdens and barriers on Iowans. It is about protecting lives.

I have been in practice for 25 years, currently working in acute and critical patient care at hospitals here in Des Moines. I have also been a consultant to critical access hospitals in rural Iowa during much of that time and for several years, I have consulted with a specialty clinic that serves about 1/2 of the Iowans who suffer from Amyotrophic Lateral Sclerosis, or more commonly known as Lou Gehrig's Disease, which unfortunately, is universally fatal, though with adequate care, their life expectancy can be maximized and the majority of these persons are able to remain at home, preserving their dignity and wisely using healthcare resources for the good of all Iowans.

I know that I my daily work is vital because of my unique scope of practice:

1) I identify and treat malnutrition, a medical diagnosis that is found with about 20% of our hospitalized Iowans (that would be about 7,000 to 8,000 persons in Polk County alone.) These persons generally cost much more to restore to health than do adequately nourished persons. The interventions I provide mitigate some of the worst problems associated with this health issue.

2) Daily, I feed patients who are not able to take nutrition orally which leaves either tube feeding or intravenous feeding as the only option to nourish the person. This is an area of medical practice for which no other health discipline has the training and the skill set to implement these feeding modalities safely and effectively.

3) I do one-on-one nutrition education and counseling with about 300 people a year to help keep them from having to take more medication over time and/or to keep them from being prematurely institutionalized; or to protect them from possibly fatal medical events as the result of ingestion of foods that harm impaired body systems, as can happen when someone goes on dialysis when kidneys fail, for example.

By the numbers over the past 25 years, I would have seen every single resident of Carroll County at least once and I would have educated every single resident of Fremont County at least once, and then some. I am just one of 1100+ Licensed Dietitian practitioners who do this kind of work every day in Iowa. We do so much more than recommend healthy foods to purchase in a store.

In order to function at the level of practice that I do, when lives are in the balance in the hospital; one must have a vital skill set that is not available in an online short course, in a series of YouTube videos or as a result of a Google search, plain and simple. I have 3 science-based university degrees that focus on biochemistry, human nutrition and food science, totaling over 250 hours of semester credit. I had to be vetted through a competitive national application process before placement in a supervised, 1200 hour internship which took place in the community, in the schools and at a teaching hospital before I was allowed to sit a national board examination to gain my practice credential before I could apply for licensure to practice in Iowa.

I am bound by this licensure to continue to engage education related to my scope of practice and to report those hours to the Board at the time of renewal of my license. These requirements are perfectly in line with the requirements for competency to practice in other health care professions, such as Physician, Physician Assistant, Nurse Practitioner, Registered Nurse, Physical Therapist, Speech Therapist, Dentist, Chiropractor, Optometrist, Social Worker and others.

Furthermore, my employer **REQUIRES** Licensed Dietitian practitioners to do the work that we do, just as they expect other allied health practitioners to be licensed. All of the health care organizations in Iowa hold to this standard of having a license before hiring a Registered Dietitian Nutritionist to be on staff. This has been the standard for hospitals and care facilities in this state for almost 4 decades. My colleagues in outpatient practice are bound by contracts that require a license before they can be credentialed to be paid by any insurance. No License

equals no money. That would be a job killer.

The Board of Dietetic Licensure is a natural extension of the Constitutional duty of the Government of Iowa to protect its citizens. This Board is strictly self-funding by the fees paid by licensees and it has operated in the black for many years. This Board has a duty to protect Iowans from those among my colleagues who may be impaired, derelict, negligent, incompetent or in arrears with their ongoing training and education. In the time that I served on the Board of Dietetics, we had the authority to vet applicants for licensure who may have been qualified but due to ongoing legal issues or addictions, they were not suitable to practice in Iowa. Similarly, we deliberated cases of alleged dereliction of practice and of practices outside of the scope of medical nutrition therapy by a licensee and issued corrective action as a result.

As I see it, if I were to be impaired, grossly negligent or found incompetent with the 3 areas of practice that I had mentioned above, causing grave injury or death, the patients and families currently have a rightful, constitutional recourse to see to it that I should cease from doing further harm to themselves or to other Iowans.

The citizens of Iowa need this Board to continue to engage the constitutional duty with which the government of the State of Iowa has been charged. Dissolution of the Board of Dietetics is a dereliction of this sacred duty.

Thank you for your attention to this matter.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Public Comment
Date: Tue Sep 05 2023 23:55:27 CDT
Attachments:

Good evening,

My name is [REDACTED], I would like to provide a public comment at the hearing on Wednesday. I would be speaking for maintaining the licensure board for Athletic Trainers.

Thank you for the opportunity.

--

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: board consolidation
Date: Wed Sep 06 2023 00:40:09 CDT
Attachments:

Ladies and Gentlemen:

The statement from the Iowa Psychological Association (IPA) addresses the straightforward, common-sense arguments against including the Board of Psychology into a board of behavioral health. There is no common-sense argument against any of the points raised by the IPA if the purpose of boards is to ensure quality of care delivered to Iowans. If the purpose of the consolidation is primarily financial conservation (with no/little consideration of quality of care), the gains will be ill-begotten and achieved at the expense of the health of Iowans. That is a heavy moral burden for the consolidation decision makers.

A salient point that was not mentioned in the IPA statement is training standards.

Iowa code requires that licensed Psychologists be registered with the National Register of Health Service Psychologists. This organization requires a national standard of education and training. It also monitors the Psychologist's good standing in all jurisdictions in which the Psychologist practices. Medical doctors/osteopaths have national certifying standards of education and training as well as jurisdictional monitoring.

Behavioral health practitioners include a myriad of groups (e.g. social workers, counselors, therapists, religious counselors, etc.) with no national standard of education and training. Simply put, there is no national or verifiable manner to guarantee that these folks have the necessary education and training to deliver safe and appropriate care to Iowans. Indeed, Iowa code stipulates that these practitioners are not qualified to diagnose and treat mental illness.

After over three decades of practice, I retired from the practice of clinical psychology and neuropsychology. During that time, healthcare leadership roles in which I served in Dubuque included Chairperson of the Department of Psychiatry at (then) Mercy Medical Center, member

of the Medical Staff Executive Committee at Mercy, member of the Medical Staff Executive Committee at (then) The Finley Hospital, Chairperson of Medical Quality Assurance at Finley, Chairperson of the Disruptive Physicians Committee, etc. These positions were both elected and appointed. The elections and appointments occurred because my medical staff colleagues respected my ability, which, in part, can be attributed to my education and training.

The services I delivered were both fee-for-service and pro bono. These services were delivered to people like you and me, as well as “minority health groups” such as the mentally challenged, the addicted, and rural folks.

The unique education and training of Iowa’s licensed Psychologists is a highly specialized combination that no other behavioral health providers can offer. Only a qualified Board of Psychology is capable of overseeing the practice of psychology.

Best practices in healthcare are difficult to maintain with increasing consolidation, emphasis on productivity, and limited number of practitioners.

Iowa has a difficult time recruiting some specialties in health care. We have few very large cities that can support several providers in one specialty. That makes Iowa unattractive to providers because, simply put, docs don’t want to be on call all the time.

Doctoral level Psychologists are a specialty that is difficult to recruit to Iowa. It is also difficult to recruit psychiatrists. Failure to protect a standard with a Board of Psychology will only exacerbate that problem.

For the protection of quality mental health services in Iowa, it is imperative that the Board of Psychology remain intact.

Thank you for considering my comments.

Respectfully,



From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Iowa Board of Athletic Training and Iowa Board of Dietetics
Date: Wed Sep 06 2023 05:33:08 CDT
Attachments:

I am writing to strongly request and recommend that the Iowa Board of Athletic Training and the Iowa Board of Dietetics not be eliminated. I am a pediatrician and rely on the expertise of evidence based providers in both of these professions.

Certified Athletic Trainers have a significant impact on the health and safety of our youth, high school and college athletes. Without appropriate State licensure, recruitment and student safety will be significantly jeopardized. The expertise of Registered Dietitians is essential for educating patients of all ages on appropriate, evidence based nutrition. Maintaining their clinical regulations ensures continued safety and protects the integrity of these professions. Maintaining these regulating boards will allow Iowa to continue to recruit and maintain these providers in our state and communities. This has a direct impact on the health and safety of our pediatric population and I urge you to not eliminate these boards.

Respectfully,

[REDACTED]

From: [REDACTED]
To: Comments, BCRC <bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Respiratory Care Licensure
Date: Wed Sep 06 2023 06:36:13 CDT
Attachments:

Good Morning,

My name is [REDACTED]. I am the Iowa Society for Respiratory Care President and I represent the respiratory therapy profession in the state of Iowa. I am voicing concern about the merging of the Respiratory Therapy and Polysomnography licensure board. Respiratory therapists care for individuals that have trouble breathing such as traumas, premature birth, critical illnesses, COPD and asthma to name a few. We also are the ones caring for the patient population who test positive for COVID and RSV plus many other severe respiratory illnesses. We work under the direction of physicians. For the safety of patients, it is important that we are joined with healthcare professionals that serve like patients.

When the merge occurs, we need a voice on the merged board to continue to assess competency for those practicing respiratory therapy and provide safe and effective respiratory care. We currently have 4 seats on our board and we need to maintain these voice in a similar ratio. Given the possible list of medical boards, it seems fitting that we would fall under the board of medicine. Physicians are familiar with respiratory care and we work in similar environments.

If consolidation/merge is what is needed, I strongly urge you to maintain the voice of Respiratory Therapists on a newly merged board, suggesting the board of medicine.

Here are a few questions from the board to help us understand how this process works:

What does the respiratory therapy representation look like on a merged board?

What is the timeline for the decisions discussed today?

Is it a possibility to have all healthcare professions under one umbrella?

I also sent an email yesterday requesting to be a part of the meeting today at noon. I have not

heard anything back yet. Could I please get the link to be able to represent the Iowa board for Respiratory Care at the hearing today?

Thank you for your time.



The information contained in this message may be privileged and confidential and protected from disclosure. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by replying to the message and deleting it from your computer. Thank you. Mary Greeley Medical Center

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Consolidation of Board of Psychology
Date: Wed Sep 06 2023 06:53:59 CDT
Attachments:

To Whom It May Concern:

I am writing to express my concern and opposition to the proposed elimination of the Board of Psychology through consolidation. Such a consolidation aims to streamline government and reduce administrative costs. However, I am concerned there are unintended consequences that would be detrimental to those served by the profession and to members of the profession.

I am concerned that such a consolidation threatens to blur the boundaries between psychologists and other behavioral health professions (e.g., masters-level social workers and behavior analysts), potentially jeopardizing the integrity of our field and the quality of care our patients receive. Psychologists are trained at the doctoral level after undergoing rigorous education and training. They are trained to provide specialized assessment, intervention, and therapy. Merging the Board of Psychology with other boards could inadvertently result in an undermining of the qualifications of psychologists and a dilution of our unique expertise.

Patients trust psychologists to provide quality services because of our unique training and ability to provide evidence-based interventions. The scope of practice of psychologists is broader than professions at the master level and should not be overseen by those with a narrower scope of practice.

One concern I have heard expressed about the many boards that currently exist is difficulty finding members to serve on the board. However, the Board of Psychology has a good track record of finding members to serve on the board.

Thank you for considering my comments and concerns.

Sincerely,

[REDACTED]

=====
[REDACTED]

"The price of success is hard work, dedication to the job at hand, and the determination that

whether we win or lose, we have applied the best of ourselves to the task at hand."
--Vince Lombardi

From: [REDACTED]
To: bcrccomments <bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Regarding Board Elimination
Date: Wed Sep 06 2023 07:21:20 CDT
Attachments:

I am writing to encourage you not remove these boards:

Board of Dietetics- RDs are already hard to find to help those of us in healthcare, yet are an incredibly valuable resource to impact the most common health problems facing Iowans. Removing their regulation makes it even harder to find these credible resources.

Board of Athletic Training - nearly all states have licensure requirements; being one of 2-3 without makes recruitment to our state difficult, and puts those who utilize their services (high school and college athletes and occupational settings) at risk.

Sincerely,
[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Psychology Board
Date: Wed Sep 06 2023 07:23:50 CDT
Attachments:

Dear Committee Members:

As a psychologist living and working in Iowa, I am writing to express strong opposition to the proposed elimination of the Board of Psychology by consolidation into a Board of Behavioral Health. Psychology is a unique discipline with specific training and ethical standards. We cover a wide range of needed mental health services in Iowa, including serving our most vulnerable: children, senior citizens, and the mentally disabled. Our work is essential in providing assessments which inform medical providers, service providers, and members of the justice system.

Merging the Board of Psychology into a broader Behavioral Health Board would dilute this unique expertise, undermining the qualifications required of psychologists. Maintaining this distinct Board is crucial due to psychologists' broad scope of practice, extensive training, and unique code of ethics and to the provision of competent care to Iowans.

Thank you for your attention to this matter. Please feel free to contact me if you would like to further discuss this issue.

Sincerely,

[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Please reconsider the elimination of the board of Athletic Trainers
Date: Wed Sep 06 2023 07:36:53 CDT
Attachments:

To whom it may concern,

I am contacting you due to very many concerns regarding the recent proposal to eliminate state oversight of Athletic training healthcare professionals.

Athletic trainers as clinicians and the Masters training program in Athletic training are critically important to the Department of Orthopedics and Rehabilitation. As clinicians they support our faculty in care delivery and provide primary care to injured athletes on the field, sideline and in the training room. They are important members of our healthcare team. Educationally our three Athletic training faculty run an excellent Master's Program that produces highly skilled graduates on a yearly basis. They are integral members of our faculty and their program fits well with the other educational programs in our department and in the College of Medicine.

Eliminating the board and licensing for Athletic training would be a step backward in healthcare regulation by allowing athletic training to become a free for all in our state, increasing the cost of care of injured athletes and decreasing or eliminating our ability to work with these skilled providers. Overall, I believe there would be many negative outcomes to this action. Our healthcare system depends on strong state boards to assure that all providers provide a safe and effective level of care and this regulation must continue to include Athletic Training.

Hopefully the proposed elimination of this board and licensure will be reconsidered and the idea will be overturned. I appreciate your time and consideration on this important issue.

Best,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From:

[REDACTED]

To: Comments, BCRC <bcrccomments@iowa.gov>

Cc:

[REDACTED]

Bcc:

Subject: Dept of Orthopedics - [REDACTED] - letter

Date: Wed Sep 06 2023 07:47:12 CDT

Attachments:

[REDACTED]
image001.jpg

Please see the attached letter, let me know if you have any questions or concerns.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Owner:

[REDACTED]

Filename: Albright ATC letter .docx

Last Modified: Wed Sep 06 07:47:12 CDT 2023



University of Iowa Health Care

UI Sports Medicine

2701 Prairie Meadow Drive
Iowa City, Iowa 52242
319-384-7070 Appts
uihc.org

UISports Medicine Center
Brian R Wolf MD MS Director

September 5, 2023



Orthopedic Sports Medicine

John Albright MD (Emeritus)
Matthew Bollier MD
Kyle Duchman MD
Robert Westermann MD
Brian R Wolf MD MS
Laura Conner PA-C
Elayne Gustoff, ARNP
Laura Magrane PA-C
Courtney Seffker, PA-C

Sports Medicine

Britt Marcussen MD
Andy Peterson, MD MPH
Tim Thomsen MD
Lisa Woodroffe MD

Physiatry

Mederic Hall MD
Ryan Kruse MD

Sports Physical Therapy

Michael A Shaffer PT OCS ATC
Coordinator
Desmond Drischell PTA
Jeff Fleming DPT OCS ATC
Joel Lee PT
Jonathan Lueth PT
Auriel Luna PTA
Shannon Miers PT SCS PCS ATC
Paul Pursley PT SCS CSCS
Katie Ryan PTA
Kolleen Shields MS PT
Barb Van Gorp DPT OCS CSCS

Outreach and Clinical

Athletic Training

Matthew Doyle MS LAT ATC
Nick Bender MS LAT ATC
Johnnie James MS LAT ATC
Kerri Meadows MS LAT OTC
Anthony Pennuto MS LAT OTC
Todd Sorensen MS LAT ATC

Athletic Training Services

Terry Noonan ATC Assistant
Athletic Director Sports
Medicine/Sports Performance

Athletic Training

Educational Program

Megan Lundstrom EdD LAT ATC
Jennifer J Rogers PhD LAT ATC

Nursing Services

Sharon Stewart RN BSN
Supervisor

Administration

Amanda Olderog, MHA

To: The Boards and Commissions Review Committee (BCRC)

Re: Iowa licensure for athletic trainers

We realize that you are receiving multiple responses about the licensure for certified athletic trainers in the state of Iowa. We are trying to understand if you are attempting to separate physical therapy and chiropractic from the many athletic trainers the practice in this state and throughout the nation and wonder how these divisions are being decided. There is a long history where at the organizational level physical therapy has attempted to distance themselves from athletic training. This is unacceptable. In the state of Iowa and throughout the nation organized sports that are at substantial risk for injury are not allowed without the presence of licensed athletic training staff.

I ([REDACTED]) emeritus professor who, along with program director Dan Foster ATC served as the medical advisor for the Athletic Training educational program at the University of Iowa for 50 years. We have a strong, successful, and important program. Employment of the certified graduates has been uniformly successful. We now have a master's degree educational program for athletic trainers which is within our orthopedic department and approved by the University of Iowa College of Medicine Administration. These programs need to continue to result in a license to practice athletic training.

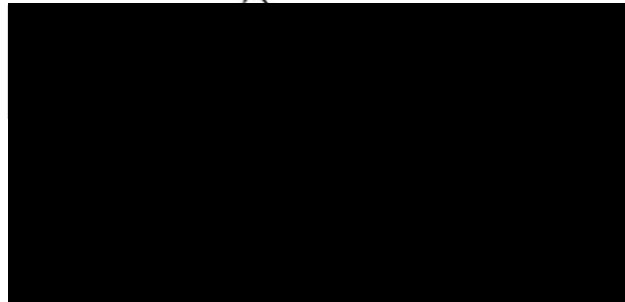
I ([REDACTED]) can attest that the use of athletic trainers throughout our orthopedic department has continually expanded and that they are valuable clinicians in our clinics and operating rooms. They see patients, write clinical notes, and do many other tasks that require training. There needs to be oversight of this training, control of quality of practice and standards that must be met. Boards and Licensure assure the public that these steps have been taken.

We are both extremely concerned about the implications of the



proposed withdrawal of the Board and licensure. This step is hard to understand and potentially bad for athletes and more broadly for healthcare in our state. Both of us would be extremely interested in the rational for this proposal and hope that any rational that exists will be carefully vetted against these concerns and those raised by others.

Sincerely,



Owner:

[REDACTED]

Filename: image001.jpg

Last Modified: Wed Sep 06 07:47:12 CDT 2023

image001.jpg for Printed Item: 645 (
Attachment 2 of 2)



UNIVERSITY of IOWA
HOSPITALS & CLINICS

University of Iowa Health Care

Page 1102 of 1221
*Department of Otolaryngology
and Rehabilitation*

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Elimination of Board of Dietetics
Date: Wed Sep 06 2023 08:19:48 CDT
Attachments:

My name is [REDACTED]. I am a registered and licensed dietitian nutritionist, and writing to let you know that I strongly disagree with the elimination of the Board of Dietetics and our licensure.

The Board of Dietetics exists to protect Iowa citizens from unethical, harmful nutrition care. Similar to other healthcare professions, becoming a dietitian involves completing a rigorous, evidence-based curriculum and supervised internship, passing a qualification exam, and taking yearly continuing education.

Licensure is particularly important in the context of medical nutrition therapy, which is specialized nutrition care seen in hospitals, clinics, long-term care, and private practice. Through MNT, dietitians manage various medical conditions: diabetes, kidney disease, malnutrition, GI disorders, and nutrition support through feeding tubes or IV; as well as providing nutritional guidance within the setting of surgeries, drugs or treatments. This is just a partial list.

Further, the livelihood of many Iowa dietitians depends on their services being reimbursed by payers who require that healthcare professionals be licensed in order to receive reimbursement. It is in Iowa law that MNT and therapeutic diets MUST be provided by licensed and registered dietitians in order to receive insurance payment.

On a national level, the Academy is working to streamline licensure by introducing an interstate compact. We strongly support this effort as it would significantly ease the burden of Iowa dietitians needing to be licensed in multiple states; and, with the increase of telehealth, broadens the income opportunities of dietitians. The Compact would also support active duty military and their spouses. We need to retain licensure in order to hold Compact privilege.

My request:

Retain the Iowa Board of Dietetics.

Retain licensure of registered dietitians and dietitian technicians, registered

Aside from the above, I work at a rural hospital. As a registered licensed dietitian I am able to

provide diabetes education to local individuals that may not be able to travel to a larger hospital for the same services. I am sure you are aware of the nursing shortage. If licensure is removed from dietitians there may not be anyone available to provide these valuable services for smaller communities.

Please continue to support my fellow dietitians.



From: [REDACTED]
[REDACTED]
To: BCRCComments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Registered Interior Designer Board
Date: Wed Sep 06 2023 08:26:20 CDT
Attachments:

Good morning,

My name is [REDACTED]. I am a Registered Interior Designer living and working in Iowa. I'm reaching out in response to the Boards & Commissions Review Committee's August 29 recommendation to eliminate the Board of Interior Design. Registered interior design professionals directly impact on public health, safety, and welfare, and now that Registered Interior Designers can practice independently in Iowa, an oversight board led by practitioners and subject matter experts will be more important than ever before. I urge the Committee to consider keeping some form of a regulatory board overseeing Registered Interior Designers intact.

During the 2023 legislative session, the Iowa Legislature passed SF 135, with overwhelming bipartisan support, which expanded the state's interior designer registration to include the ability to stamp and seal nonstructural construction plans for permitting. This was a huge step forward for Interior Designers in the state of Iowa that have been working hard at helping individuals understand the complex issues that we deal with on projects every day as design professionals. Registered interior designers can now practice independently with that title. With that capability, the potential for risk to public safety exists with it. So even if there was little discipline necessary for RIDs before SF 135 become law, enforcement, and disciplinary capacity of RIDs will be more critical than ever before. Those matters are best left to subject matter experts and practitioners in the profession, as they are in other states.

If maintaining the Board of Interior Design is not an option, perhaps it can be merged with the Board of Architects. Joint boards are utilized in many states in the US, and due to the overlap in practice between architects and registered interior designers, such a board would be uniquely qualified to enforce the law and discipline those that cause harm or break it.

Please keep a subject matter expert-led regulatory board intact for the interior design profession.

Thank you-

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The information contained in this communication may be confidential, and is intended only for the use of the recipient(s) named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please return it to the sender immediately and delete the original message and any copy of it from your computer system.

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc: [REDACTED]
Bcc:
Subject: Letter of Support for Interior Design Oversight Board
Date: Wed Sep 06 2023 08:31:58 CDT
Attachments: IIDAHQ.SupportIowa.09.06.23.CD Signature.pdf

Dear Iowa Boards and Commissions Review Committee,

Attached is a letter of support for Interior Design oversight from [REDACTED]
[REDACTED]

Thank you for your attention to this important matter.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

IIDA

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The Commercial Interior Design Association

Owner:

[REDACTED]

Filename:

IIDAHQ.SupportIowa.09.06.23.CD Signature.pdf

Last Modified:

Wed Sep 06 08:31:58 CDT 2023



HEADQUARTERS

111 E. Wacker Drive, Suite 222
Chicago, IL 60601 USA
888.799.IIDA (4432)
www.iida.org

Iowa Boards and Commissions Review Committee
1007 E. Grand Ave.
Des Moines, IA 50319
BCRCcomments@iowa.gov

September 6, 2023

Dear Boards and Commissions Review Committee Members,

My name is [REDACTED], and I am the Executive Vice President and Chief Executive Officer for the International Interior Design Association (IIDA). I am writing in response to the Boards & Commissions Review Committee's August 29th recommendation to eliminate the Interior Design Examining Board.

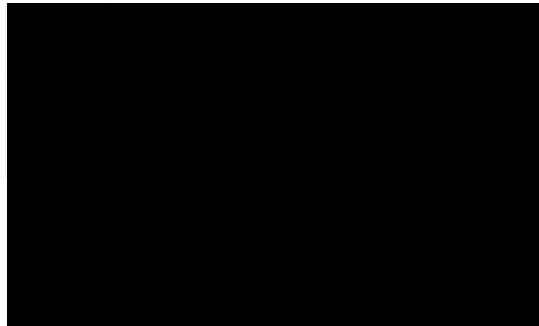
With more than 15,000 members, IIDA represents and supports commercial interior design professionals, industry affiliates, educators, students, and firms across 58 countries. We advocate for the advancements in education, design excellence, legislation, leadership, and accreditation to increase the value and understanding of the profession of Interior Design and its impact on the health, safety, and welfare of the public.

This year, the Iowa Legislature passed SF 135, which expanded the state's interior designer registration to allow registered interior designers to both practice independently and to stamp and seal nonstructural construction plans for permitting. With this greater scope in protection of the public comes the need for greater accountability. We believe that these matters are best left to subject matter experts and practitioners in the profession, as they are currently in the 27 other states with interior design legislation.

If maintaining an independent Interior Design Examining Board is not a viable option, please consider merging the board with the Architectural Examining Board. Because of the overlap in practice between architects and registered interior designers, such a board would be uniquely qualified to oversee the profession and keep it accountable. Similar joint boards currently exist in 15 states.

The Interior Design community in Iowa is grateful for your attention to this matter. On their behalf, I ask you that you please keep a subject matter expert-led regulatory board intact for the interior design profession. If you have questions about this issue or the role of IIDA, please contact me directly.

Best wishes,



From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Board of Athletic Training
Date: Wed Sep 06 2023 08:33:22 CDT
Attachments:

Hello,

My name is [REDACTED], I'm a primary care sports medicine physician in Ankeny, IA and am writing today to voice my strong support for keeping the board of athletic training intact. Athletic trainers provide a valuable resource for our middle and high school athletes as well as our college student athletes throughout the state of Iowa. Getting rid of this board would place Iowans at a huge disadvantage as it will be hard to recruit ATCs when there is no accreditation process. This will leave many ATC positions unfilled and many athletes uncared or improperly cared for. As we've seen with some high profile cases recently (Damar Hamlin, Christian Erickson), having a properly trained ATC on the sideline can literally save somebody's life. Almost every other state is, or has recently, moved toward mandating accreditation for ATC's - I would hate to see Iowa go backwards in this regard while all other states continue to go forward.

Please don't hesitate to reach out with any questions.

Thanks,

[REDACTED]

From:

[REDACTED]

To:

bcrccomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

[REDACTED]

Subject:

Oppose elimination of Board of Psychology

[REDACTED]

[REDACTED]

I strongly oppose the elimination of the board of psychology and consolidation into board of behavioral health. It is a disservice to lowans and will severely impact their care by doctoral level licensed psychologists whom they trust with mental health. Given the state of mental health in Iowa and nationally, such a consolidation will minimize the oversight in a way that will make mental health issues worsen.

Please uphold the Board of Psychology.

Thank you,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

This message and accompanying documents are covered by the Electronic Communications Privacy Act, 18 U.S.C. sections 2510-2521, and contain information intended for the specified individual(s) only. This information is confidential. If you are not the intended recipient or an agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error and that any review, dissemination, copying, or the taking of any action based on the contents of this information is strictly prohibited. If you have received this communication in error, please notify us immediately by e-mail, and delete the original message.

Owner:

[REDACTED]

Filename: image001.png

Last Modified: Wed Sep 06 08:40:26 CDT 2023



image001.png

for Printed Item: 653 (Attachment 1 of 1)

Blank Children's Hospital

UnityPoint Health

Page 1115 of 1221

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: AT's
Date: Wed Sep 06 2023 08:44:51 CDT
Attachments:

Hello,
My name is [REDACTED]. I am concerned about this upcoming bill as related to athletic trainers. I work closely with some great athletic trainers and am worried that if you take away the licensure for them then we won't be able to recruit them to work with us at UIHC orthopedics department. They are a great help to my orthopedic surgeons.
Thank you for listening to my concerns.
Sincerely,

[REDACTED]

[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: DIAL reorganization
Date: Wed Sep 06 2023 08:56:15 CDT
Attachments:

Hello,

In my opinions, with the suggested revisions, DIAL has too many boards to oversee. There is close to 50, which has more than any other board, second only to HHS which has just over 30. I would suggest dividing DIAL into 2 groups, health and non-health at the minimum.

[REDACTED]

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Iowa Senate File 514 proposed dissolution of the Board of Athletic Training
Date: Wed Sep 06 2023 09:13:46 CDT
Attachments:

I am writing to express my dissatisfaction and frustration with the proposed elimination of the Board of Athletic Training.

We as a state have always taken great pride in our education system and the success of the citizens of the state of Iowa. To eliminate the Board of Athletic Training will create devalue the education and ongoing success of Athletic Trainers. There are 47 states that recognize the importance of licensure , eliminating this board has the potential to discourage highly qualified professionals from practicing/living in the state of Iowa and increase the loss of our younger citizens. I believe we as a state, should always want to encourage our young citizens to excel/grow and mature in their home state. Why is it a good idea to discourage them? As the landscape of the our healthcare continues to evolve and change, it is essential to continue to license and regulate essential healthcare providers. The Athletic Trainers are professionals and an essential part of our healthcare system.

I am requesting that the BCRC reconsider eliminating the Board of Athletic Training.

Sincerely,

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic Training License
Date: Wed Sep 06 2023 09:35:56 CDT
Attachments:

To whom it may concern:

It is with GREAT concern that the legislators in this state feel the need to un-license a medical professional. What could you possibly be thinking?

Athletic trainers are healthcare professionals who specialize in the prevention, diagnosis and intervention of emergent, acute and chronic medical conditions involving impairment, functional limitations and disabilities.

Athletic trainers provide medical services to all types of patients. Across the United States, in addition to practicing in traditional sports team settings, athletic trainers work in performing arts, public safety, occupational health, and with the armed forces.

Licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.

So, the legislators in Iowa will be okay with any unregulated person taking care of their young athletes at the university, college or high school level. WHAT KIND OF PUBLIC PROTECTION IS THAT?

Please don't do it!!!!

[REDACTED]

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc: [REDACTED]
Subject: Iowa Chiropractic Licensure Board
[REDACTED]

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

From: John Cacciatore
<john.cacciatore@policyworksllc.com> on behalf of John Cacciatore <John.Cacciatore@policyworksllc.com>
<john.cacciatore@policyworksllc.com>
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Written comments for the Board and Commission Review Committee
Date: Wed Sep 06 2023 09:57:15 CDT
Attachments: Comments to Comittee 9.6.23.pdf

Attached, please find written comments from the Plumbers and Steamfitters Local 33 to the Board and Commission Review Committee.

Thank you for your consideration,

John Cacciatore | Senior Vice President

POLICYWORKS

government affairs | public relations

[REDACTED]

[REDACTED]

[REDACTED]

Owner:

[REDACTED]

Filename: Comments to Comittee 9.6.23.pdf

Last Modified: Wed Sep 06 09:57:15 CDT 2023



Andy Roberts
BUSINESS MANAGER

PLUMBERS AND STEAMFITTERS

LOCAL UNION 33

Jason Shanks
BUSINESS REPRESENTATIVE

To: The Boards and Commissions Review Committee
Fr: Andy Roberts, Business Manager Plumbers and Steamfitters Local 33
Re: Comments on proposed elimination, mergers and changes to State Boards and Commissions
Dt:

Plumbers and Steamfitters Local 33 represents workers from Sioux City, Fort Dodge, Mason City, Ames, Des Moines, Ottumwa and parts in between. Below are our comments about specific subcommittee recommendations.

Item 42 – Merge the Plumbing and Mechanical Board

There are specific skills and unique training requirements to become a proficient licensed plumber. Individuals on the Plumbing and Mechanical Board understand those requirements and skills and are qualified to review and update standards to ensure that individuals that pass the Iowa test to be a licensed plumber will do quality work that ensures public safety for Iowans.

Members of the Plumbing and Mechanical Board are charged with investigating bad actors in their specific field. What assurance does the public have that a merged board with broader responsibilities will have the capacity to ensure bad actors are investigated and disciplined?

The subcommittee recommends merging the Plumbing and Mechanical Board. Since there is no detail describing what the merged board looks like, Local 33 is concerned the merged board will be diluted and there won't be adequate representation of highly skilled and trained union plumbers and contractors on the merged board. If that expertise is diminished on the merged board, we believe public safety will be compromised.

We urge the committee to reach out to all relevant stakeholders and discuss their goals and what they are thinking a merged board could look like to learn of the potential outcomes and consequences of what is being considered.

Item 12 – Elimination of the Boiler Board

This is clearly a public safety issue. Large boilers adequate for manufacturing facilities require objective oversight to ensure public safety. Without the oversight of an independent state board that has expertise in the installation, management and maintenance of such boilers, the reliability and timeliness of adequate inspections could diminish and a tragedy costing human lives could be the end result. Local 33 opposes the elimination of the Boiler Board.

Items 192 and 193 – Reorganize/change the Workforce Development Board and the local Workforce Development Boards.

The State Workforce Board and the local Workforce Boards play an integral role in developing efforts to address workforce needs statewide and unique to their jurisdiction. The subcommittee recommendations do not describe what the reorganization or changes are so we are concerned that the expertise locally and statewide will be diminished.

BUILDING UNION IS GOOD BUSINESS

2501 Bell Avenue • Des Moines, IA 50321-1118 • Phone: (515) 243-3244 • Fax: (515) 243-3243 • www.ualocal33.org





Andy Roberts
BUSINESS MANAGER

Jason Shanks
BUSINESS REPRESENTATIVE

PLUMBERS AND STEAMFITTERS

LOCAL UNION 33

Today, there is not enough labor representation on the state Workforce Board or the local Workforce Boards. Local 33 recommends more labor participation in the development of workforce policies and activities to address statewide and workforce needs – not less. We are on the frontlines doing the work and see and feel the effects of workforce shortages or gaps.

Labor brings their unique voice to these Boards and we are concerned that any reorganization or changes will dilute that expertise and lessen the value of the product developed by the statewide Workforce Development Board or the local Workforce Boards.

Local 33 recommends that all non-government stakeholders be included in the deliberations by this committee so the ramifications and consequences of what reorganization or changes are being considered can be discussed and evaluated before any recommendations to the Governor and the Legislature are made.

Recommendation 8 – Clear, consistent and efficient licensing standards across all boards

This sounds good, however the devil is in the details. Licensing standards in each trade and profession are unique to the skills required in that trade or profession. The time it takes to learn the skills to be a proficient plumber and the timeliness to be refreshed and up to date, may be quite different from an accountant or an architect.

Local 33 requests to be included in the discussions by the committee on any changes to licensing standards or processes.

BUILDING UNION IS GOOD BUSINESS

2501 Bell Avenue · Des Moines, IA 50321-1118 · Phone: (515) 243-3244 · Fax: (515) 243-3243 · www.ualocal33.org



From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Hearing instrument specialist deregulation
Date: Wed Sep 06 2023 10:12:35 CDT
Attachments:

I am writing in opposition to the deruglation of liscensing for hearing instrument specialist (HIS) in Iowa. I am an office manager for a miracle ear office and I have watched first hand my HIS improve lives for elderly but also all people but they would not be able to do that without my specialists training and education in hearing aids.

Our patients want to be informed on hearing aids. The generations we deal with want to know the why, they WANT to be educated on the audiometry and the anatomy of an ear and ear drum. Without training and licensing of our specialist they could not do that and they could not express how important be able to hear is.

Hearing is one of the 5 senses. It's like seeing. You have to go to a doctor to be able to see and get a prescription and go through testing and peoples time and education is what is important to be able to do so. Hearing is no different nor should it be treated as such! If you get people selling hearing aids or getting people to test hearing who have not taken the time and effort and honestly genuinely the PASSION you're going to get patients/clients who continue to be uneducated about hearing aids and their hearing and just how important it is.

Elderly have faced so much change in their life and so many technological advances. To expect them to have some adult who is untrained and uneducated is absolutely upsetting to say the least but also just downright damaging.

This law should be really honestly thought about and given true examination before passing.

Thank you for your time and efforts.

[REDACTED]

From:

[Redacted]

To:

BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>

Cc:

[Redacted]

Subject:

Board of Hearing Aid Specialist

[Redacted]

Good Morning,

Please see the attached letter. Thank you for taking the time to review.

Sincerely,

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Owner:

[REDACTED]

Filename: Document_2023-09-06_101126BoardHearingSpecial.pdf

Last Modified: Wed Sep 06 10:22:23 CDT 2023

Dear Boards and Commissions Review Committee members,

I write to you today, as a licensed hearing aid specialist who provides hearing healthcare services to an increasingly growing population, to express my concern with the Boards and Commissions Review Committee Subcommittee's August 29, 2023, recommendation to eliminate the Board of Hearing Aid Specialists (herein referred to as "the Board").

The elimination of this Board will result in the unintended consequence of:

- Limiting/ lowering hearing healthcare access;
- Loss of licensure;
- Eliminating consumer protection;
- Compromised patient safety;
- Individual complacency;
- Reducing competition; and
- Laxed hearing healthcare industry standards.

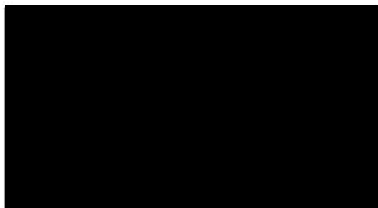
This is because this Board – consisting of hearing healthcare industry experts- evaluates an individual's application for licensure and issues a license if the individual meets statutory, regulatory, and board requirements. Additionally, the Board promulgates regulations to ensure consumer protections from fraud and abuse and educational standards that aligned with current practices to best serve Iowa's hearing-impaired citizens. Furthermore, this Board investigates complaints about unprofessional conduct.

Eliminating this Board may be interpreted by the U.S. Food and Drug Administration (FDA) as eliminating the ability of licensed hearing aid specialists to order the use of prescription hearing aids. Late 2022, the FDA issued [regulations](#) recategorized "traditional hearing aids," which have been dispensed by licensed hearing aid specialists for decades, as "prescription medical devices," which must be "prescribed or ordered the use of" by a licensed hearing care professional; 21 C.F.R. § 801.109. Prescription hearing aids require a written or oral authorization from a practitioner licensed by law to administer the device (C.F.R. § 801.109).

It is for these reasons that it is paramount that Iowa maintains the Board of Hearing Aid Specialists.

Thank you for your attention to my concerns with eliminating the Board of Hearing Aid Specialists and I respectfully ask for your consideration. Please feel free to contact me if you would like to discuss this issue further.

Sincerely,



Respectfully,



From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Iowa Hearing Aid Dispenser License
Date: Wed Sep 06 2023 10:30:17 CDT
Attachments: Outlook-signature_.png

Good morning,

As an audiologist and private practice owner, it is alarming to me to find out that the State would seek to get rid of the Hearing Aid Dispenser License. There are three primary reasons this is a concern for public safety and public health.

First, there are some bad actors that are in the hearing aid space. Most of them exist online and try to take advantage of the older population's inexperience with hearing aids. Having the confidence to go to a licensed provider with specialized training helps the public be more confident they are working with someone who knows about hearing loss. Given that taking away the license means that anybody can start selling hearing aids without any prior knowledge of how to program or use the devices. In some cases, they could be over amplified and cause further hearing damage.

Second, having some form of formal training on hearing loss, hearing aids, and long-term hearing health is what helps protect consumers against people just trying to make a quick sale. Are all hearing care professionals perfect? Of course not but having some form of bar to clear helps to keep some of those folks from taking advantage of the public.

Lastly, the exam. This exam. Not only to new professionals have to learn new concepts and ideas but apply them to an exam that is fairly exhaustive. It is developed by the International Hearing Society.

I understand that the State is trying to run for efficiently, in getting rid of the Hearing Aid Dispenser Board and License, the longer-term effects on the older population in Iowa would unfortunately be them being more likely to be swindled and, even worse, possibly having their hearing damaged further but poorly fit devices.

Respectfully,

[REDACTED]

[REDACTED]

[REDACTED]

Confidentiality Notice

This message is intended only for the individual or entity to whom it is addressed. If you are not the intended recipient, you are notified that any disclosure, distribution or copying of this communication is strictly prohibited. This communication may also contain protected health information (PHI). Failure to maintain PHI in a secure and confidential manner or unauthorized redistribution of PHI could subject you to penalties under state and federal law. If you have received and/or are viewing this message in error, please immediately notify the sender and delete or shred completely.

Owner:

[REDACTED]

Filename: Outlook-signature_.png

Last Modified: Wed Sep 06 10:30:17 CDT 2023



From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic Training Licensure
Date: Wed Sep 06 2023 10:37:10 CDT
Attachments:

Good morning,

As a licensed athletic trainer in the state of Iowa I believe we will be regressing as a profession if we go through with eliminating the athletic training licensure. We would then be one of only two states without licensure for my profession and I feel that would be a disservice for all of the athletes, patients and individuals that we serve.

The biggest impact I see with this change would be the concussion protocol. I evaluate, rehab and treat multiple concussed athletes/patients weekly and our physicians recognize the work we do and trust us as licensed professionals. If this goes away we will no longer be able to put these individuals through the return to learn and play process. I currently work with licensed professionals (physicians, physician assistants and nurse practitioners) who are not aware of the up to date concussion protocols and the state of Iowa concussion law and won't follow the return to play protocol if we are not there is implement it.

Athletic trainers are healthcare professionals who specialize in the prevention, diagnosis and intervention of emergent, acute and chronic medical conditions involving impairment, functional limitations and disabilities. Licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.

With the profession of athletic training getting more light in the news with injuries like Damar Hamlin, I think this is the wrong time to make these changes and instead we should be looking to advance and promote this profession as it is now a Masters level degree.

Thank you for your time,
[REDACTED]

Sent from my iPhone

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic Training Licensure Board
Date: Wed Sep 06 2023 10:39:21 CDT
Attachments:

To whom it may concern,

My name is [REDACTED] and I am a clinical athletic trainer at the University of Iowa Hospitals and Clinics Orthopedics Department. I am also a resident of Iowa City, Iowa, a Board Certified and Iowa Licensed athletic trainer, and a preceptor within the MSAT program at the University of Iowa.

I have been made aware of the possibility that you will be eliminating the Licensure Board, and subsequently, the licensure for Athletic Trainers in the state of Iowa. I am reaching out to comment on these proposed changes to committees/boards in our state. It is alarming to imagine what this would do to the safety of athletes in our state. Athletic trainers play a vital role in the safety of young athletes playing sports in our state on a daily basis, through youth sports to high schools and at the collegiate level.

The presence of athletic trainers allows coaches to coach and a licensed health care providers to prevent, evaluate, treat, and rehabilitate injuries. Additionally, should an emergency occur on the field or playing surface, athletic trainers have training in immediate care and activation of emergency action plans/response. Finally, and more specifically, with concussion care being such an important and vital topic, having trained professionals who can diagnose and treat head injuries accurately and effectively is necessary for safe participation in sports.

If the licensing system for athletic trainers was removed, it would be up to the hiring schools or hospitals to determine the viability of an individual to be an athletic trainer. This means that those who may not have a background or education in healthcare will be charged with determining who is qualified to provide healthcare to our athletes and patients.

By eliminating the licensure system for our state, we would only rely on the Board of Certification (BOC) exam as a way of assessing the quality of an athletic trainer. While this examination is designed to protect the public by screening recent graduates of basic knowledge and skill, we need a means for our state to monitor athletic trainers and ensure continuing education. This is necessary for public protection as best practices evolve over time and without up to date knowledge, the safety of athletes, and even the general public, is endangered.

Across the US, 49/50 states have some form of regulation of the profession of athletic training. The one remaining state has an active bill that would require regulation of the practice of

athletic training. Licensure is required in 47/50 states.

Finally, as an athletic trainer that has worked at the collegiate level, high school level, and now in the clinical setting with occasional outreach, it is vital that we have individuals who are charged with athlete and public safety who are regulated with their licensure to make sure they are up to date on the best practices and latest research for emergency care and patient care.

I urge you to vote against getting rid of the athletic training licensure board.

Thank you for your time.

Best,



Notice: This e-mail (including attachments) is covered by the Electronic Communications Privacy Act, 18 U.S.C. 2510-2521, is confidential and may be legally privileged. If you are not the intended recipient, you are hereby notified that any retention, dissemination, distribution, or copying of this communication is strictly prohibited. Please reply to the sender that you have received the message in error, then delete it. Thank you.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: HIS LICENSURE MATTERS!!!!
Date: Wed Sep 06 2023 10:42:04 CDT
Attachments: Outlook-Audibel.png

To whom it may concern

Hearing instrument specialists provide a huge support to the hearing aid industry and the availability for patients to receive quick and quality care based on their needs. If you choose to get rid of this licensure the amount of patients that would lose that access would be so great it would compromise their hearing health. What everyone wants is what is best for the people that need hearing aids and counseling on hearing problems. It is crucial to have a separate licensure for HIS in order to guarantee these patients are fitted with the appropriate devices and specialized care. Hearing Instrument Specialists also handle most of the hearing aid sales that AuD's would not want to do themselves. For example, working at Costco or Miracle Ear that are designed specifically for the SALE of hearing aids rather than the treatment of hearing concerns like ear infections, sudden losses, and deformities. Most professionals with an AuD prefer to work in an ENT or hospital setting. Please consider keeping the licensure for Hearing Instruments Specialists as it's what is best for patients and for the people whose jobs would be lost if this licensure was revoked or merged.

Thank you for your attention to this matter,

[REDACTED]

[REDACTED]

[REDACTED]

NOTICE: This e-mail is intended only for the addressed party and may contain information that is proprietary/confidential or otherwise protected. If you are not the named addressee, you are not authorized to view this message. If received in error, please contact the sender and delete the communication.

Owner:

[REDACTED]

Filename: Outlook-Audibel.png

Last Modified: Wed Sep 06 10:42:04 CDT 2023



From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic Training Concerns
Date: Wed Sep 06 2023 10:52:37 CDT
Attachments: image001.png

To whom it may concern:

I am very concerned about the proposal to eliminate state oversight of Athletic training healthcare professionals.

Athletic trainers as clinicians and the Masters training program in Athletic training are critically important to the Department of Orthopedics and Rehabilitation. As clinicians they support our faculty in care delivery and provide primary care to injured athletes on the field, sideline and in the training room. They are important members of our musculoskeletal healthcare system. Educationally our three Athletic training faculty run an outstanding Master's Program that produces highly skilled graduates on a yearly basis. They are integral members of our faculty and their program fits well with the other educational programs in our department and in the College of Medicine.

Eliminating the board and licensing for Athletic training would be a step backward in healthcare regulation, allow athletic training to become a free for all in our state, increase the cost of care of injured athletes and decrease or eliminate our ability to work with these skilled providers. I believe it is very hard to predict all the negative effects of this proposed action. Our healthcare system depends on strong state boards to assure that all providers provide a safe and effective level of care and this regulation must continue to include Athletic Training.

Hopefully the proposed elimination of this board and licensure will be reconsidered and the idea will be discarded. I appreciate your thoughtful deliberation on this critically important issue.

Thank you,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Owner:

[REDACTED]

Filename: image001.png

Last Modified: Wed Sep 06 10:52:37 CDT 2023



image001.png for Printed Item: 671 (Attachment 1 of 1)

Page 1143 of 1221

University of Iowa Hospitals and Clinics

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Iowa Board of Athletic Training and Iowa Board of Dietetics
Date: Wed Sep 06 2023 10:56:54 CDT
Attachments:

I am writing to voice my strong opinion AGAINST eliminating the Iowa Board of Athletic training and the Iowa Board of Dietetics.

This effectively removes state regulation of these professions, is wildly inappropriate and could prove disastrous.

47 (soon to be 48) states have licensure requirements for athletic trainers. Being one of 3 without would make recruitment of these vital healthcare allies even harder for our state and put our high school, college athletes and many occupational settings who currently employ ATs at significantly higher risk.

Registered dietitians are also incredibly undervalued in our current healthcare model, and I could not do my job as a physician without them. Removing their clinical regulation allows evidence-based, credible nutrition resources to become even harder to find in the weeds of today's "everyone's an expert" era.

Eliminating these boards could jeopardize the health of Iowans and make it even more difficult to recruit providers in these areas. Our state is already underserved in many areas of healthcare. I think it is a terrible idea to eliminate oversight in clinical medicine.

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc: [REDACTED]
Bcc:
Subject: Athletic Trainer licensure
Date: Wed Sep 06 2023 10:58:37 CDT
Attachments: image001.jpg
image002.png
Iowa Board review letter.pdf

Please find the attached letter in support of our AT colleagues in Iowa.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Owner:

[REDACTED]

Filename: image001.jpg

Last Modified: Wed Sep 06 10:58:37 CDT 2023

image001.jpg for Printed Item: 674 (Attachment 1 of 3)



Page 1147 of 1221

Owner:

[REDACTED]

Filename: image002.png

Last Modified: Wed Sep 06 10:58:37 CDT 2023



Owner:

[REDACTED]

Filename: Iowa Board review letter.pdf

Last Modified: Wed Sep 06 10:58:37 CDT 2023



September 5, 2023

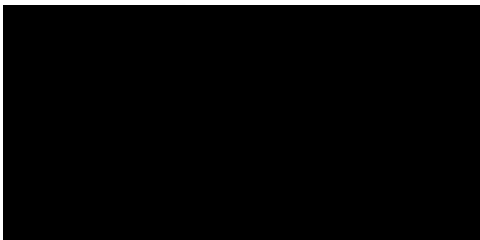
Boards and Commissions Review Committee,

This letter is written on behalf of the Missouri Athletic Trainers' Association to express opposition to the elimination of the Iowa Board of Athletic Training. As a professional membership association from a border state, this change could have a negative impact on our members here in Missouri. We believe the proposed elimination would have a negative impact on the citizens of Iowa. Without title protection, any person could call themselves an Athletic Trainer and attempt to render aid without the proper education and training.

Athletic Trainers are regulated (licensure or registration) in all states but California. We do not believe it would be in the best interest of the people of Iowa to follow the California model of no regulation for a health care provider. With licensure and the diligence of the Board of Athletic Training, professional preparation and continuing education are monitored while keeping up with rapid changes in the health care industry. The quality of care being delivered to Iowa citizens would decline if the Board of Athletic Training is eliminated.

In summary, we believe that the elimination of the Board of Athletic Training would be a grave mistake for the people of Iowa. While your Review Committee has a daunting task of evaluating individual Boards and Commissions, please consider the impact it will have not only on your citizens, but those of the surrounding states.

Sincerely,



From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc: [REDACTED]
Bcc:
Subject: Comments on the proposed preliminary recommendations regarding the
Boards and Commissions Review
Date: Wed Sep 06 2023 11:01:02 CDT
Attachments:

Members of the Boards and Commissions Review Committee,

LeadingAge Iowa represents not-for-profit providers of aging services and long-term care services and supports across the state. Based on member feedback, we are providing the following comments on the preliminary recommendations for the committee's consideration regarding your proposed preliminary recommendations to eliminate, merge, or consolidate various state boards and commissions, dated August 29, 2023.

While we understand and appreciate that restructuring and/or reorganizing practices within the State government can achieve efficiencies, we also want to ensure that we do not eliminate the expertise and the due process by peers of similar backgrounds that many of these boards provide for disciplinary actions, changes to scope of practice, education, and many other duties the individual boards are tasked with.

Specifically, we have significant concerns related to the 3 following proposed preliminary recommendations:

* Health Facilities Council: The recommendation of the Boards and Commissions Review Committee is to eliminate the Health Facilities Council, which is tasked with approving Certificate of Need (CON) applications in which many of our members have completed in the past for new construction, addition of services, etc. Currently, the state has passed a moratorium on new nursing home beds throughout the state to provide opportunity to study and revise the criteria for evaluating CON applications for nursing home beds. However, based on the projected increases in the older adult population and the closures experienced, additional nursing home beds may be needed in the future. The Health Facilities Council plays an important role in the CON process, ensuring that non-biased public representatives review the information provided and decide on the application. The decision to eliminate the Council

without further detail on how these decisions will be made in the future in a non-biased manner, is very concerning.

* Board of Nursing Home Administrators: The recommendation of the Boards and Commissions Review Committee is to eliminate the Board of Nursing Home Administrators. While the board is tasked with evaluating the qualifications of applicants for licensure, which can be completed through a review of education, experience, and testing, the board is also tasked with reviewing complaints on unprofessional conduct and promotes public health, welfare, and safety. Without an understanding of how the complaint process will be in the future if this board is eliminated, we have strong concerns about the elimination of this board because of the importance of peer review for due process in disciplinary hearings. The history of individuals with similar licensure and public representation ensures that licensees receive fair treatment based on what others like themselves would do in given circumstances.

* Board of Nursing: The recommendation for the Board of Nursing includes reorganization or other changes, which are not included in the initial summary document. Traditionally the Board of Nursing reviews curriculum for various educational programs throughout the state, reviews applications for reconsideration, establishes the scope of practice in accordance with specific Iowa considerations as well as other states throughout the nation. The majority of the RNs work in hospitals (48%) or office settings (18%); however, with new federally proposed minimum staffing requirements, long-term care providers will be required to hire more Registered Nurses. On the other hand, most LPNs (46%) work in the long-term care setting which traditionally has been an environment where individuals who have experience and additional certification courses can practice with a diploma in nursing rather than a higher-degree level due to the lower level of acuity of the residents in their care. These considerations can only be understood by individuals of similar background, such as the current representation on the nursing board of a LPN and a RN with long-term care experience. We have strong concerns that if the board size is reduced, the board will not represent the broader nursing profession of various degrees and practice settings. We also cannot emphasize enough the need for individuals of similar licensure and background to aid in making decisions regarding rules, scope of practice and discipline which impact these environments and maintain the safety for those we serve.

Thank you for your consideration. We are happy to provide additional information or answer any questions.

Sincerely,



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Iowa Boards and Commissions Review Committee - Iowa Board of Athletic Training
Date: Wed Sep 06 2023 11:01:56 CDT
Attachments:

Good morning,

I am a current collegiate coach entering my ninth year of coaching. I work with over 70 student-athletes on a daily basis, and could not do my job successfully without the support of a wonderful athletic trainer. Her work with our team (and the work of countless other ATs around the state) impact the lives of young men and women in immensely positive ways - both physically and mentally.

I am writing to voice my opposition to the elimination of the Board of Athletic Training and licensure of athletic trainers in Iowa. This is very detrimental to not just the profession, but to the thousands of patients who athletic trainers care for every day in our state. Elimination of licensure would lead to danger and safety issues for all of our physically active patients, but especially our youth athletes.

In 2018, Athletic Trainers were the driving force behind passage of HF2442, which set standards for concussion management in youth sports. Athletic Trainers are the primary licensed health care providers on the sidelines for all of Iowa's high school football games and other interscholastic sporting events. Removing AT's licensure would conflict with current Iowa code in this area and cause unresolvable problems for high schools trying to protect their students.

California is the only other state without regulation for athletic trainers, and I don't want to see Iowa compared to that state as the only two states who allow delinquent health care professionals to come practice and place our residents in danger.

Licensure provides the highest level of patient protection, and it is the gold standard of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.

Eliminating licensure in Iowa could potentially impact an AT's ability to practice across state lines (travel with their team), depending on regulatory requirements in other states. (ex. some states allow you to practice in their state temporarily, provided your home state maintains the same regulatory requirements).

Thank you for your time.

█

█
█
█
█

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc: [REDACTED] >
Bcc:
Subject: BCRC submission: HIA
Date: Wed Sep 06 2023 11:03:35 CDT
Attachments: HIA Letter 09.06.2023.pdf
image001.jpg

Please accept the attached letter on behalf of [REDACTED] President, Hearing Industries Association regarding the proposed recommendation to eliminate the Board of Hearing Aid Specialists. We wish to express our concern with the recommendation as proposed.

We appreciate your consideration and please don't hesitate to reach out with any questions or if we can provide additional information.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Owner:

[REDACTED]

Filename: HIA Letter 09.06.2023.pdf

Last Modified: Wed Sep 06 11:03:35 CDT 2023



September 6, 2023

Dear Boards and Commissions Review Committee Members,

The Hearing Industries Association appreciates the opportunity to provide feedback regarding the proposed recommendation to eliminate the Iowa Board of Hearing Aid Specialists and wish to express our concern with the recommendation as proposed.

The Hearing Industries Association (“HIA”) is the national organization of the manufacturers, suppliers, and distributors of hearing aids, implants, assistive listening devices, component parts, and power sources. HIA’s mission is to be a trusted voice on product innovation, patient safety and education, and public policy.

In August 2022, FDA published a final rule establishing over-the-counter hearing aids (“OTC hearing aids”). As part of this rule, all hearing aids that are not OTC hearing aids are reclassified as “prescription hearing aids” that may be sold only to or on the prescription or other order of a practitioner licensed by law to order the use of (prescribe) the devices.¹ As part of the rule, FDA defers to States to determine appropriate licensing requirements for prescription hearing aids and the professionals authorized to “prescribe” or “order the use of” these devices.

Iowa has long licensed and regulated both audiologists and hearing aid specialists, providing an essential pathway for individuals with hearing loss to seek treatment, provide consumer protections, and ensure integrity within the profession. Given the OTC hearing aid rule and the deference to state licensing requirements for prescription hearing aids addressed therein, elimination of the Board of Hearing Aid Specialists may have the unintended consequence of restricting access to prescription hearing aids for those who need them most by effectively precluding an entire category of hearing professionals from practicing within their scope.

We appreciate the intention behind reforming the licensing and regulatory process but are concerned that elimination of the Board of Hearing Aid Specialists will result in multiple unintended consequences, including weakening consumer protections and limiting access to hearing loss solutions, particularly in rural areas.

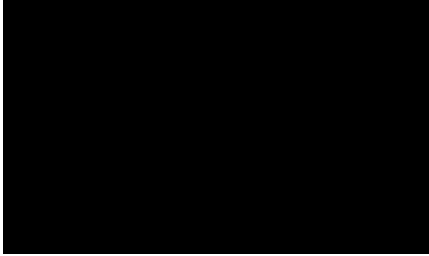
Hearing health is essential, and the use of hearing aids can help avoid the negative social, emotional, and health consequences of hearing loss. Beyond the associated comorbidities of hearing loss, there are significant positive impacts on overall health and wellbeing, with 8 in 10 individuals who treat their hearing loss reporting life-changing results. Access to licensed hearing professionals – including hearing aid specialists – is an important part of treating

¹ Medical Devices; Ear, Nose, and Throat Devices; Establishing Over-the-Counter Hearing aids, 87 Fed. Reg. 50698 (August 17, 2022)

hearing loss, as those with hearing loss report even higher rates of satisfaction with their hearing professional.

We look forward to working with you to support all licensed hearing professionals and individuals with hearing loss and urge reconsideration of the proposed recommendation to eliminate the Board of Hearing Aid Specialists.

Sincerely,



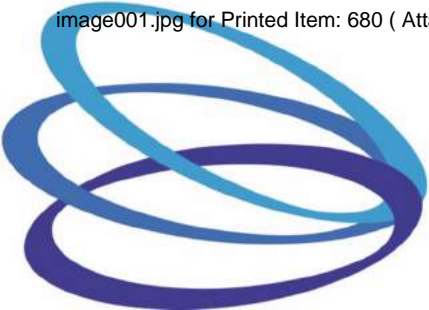
Owner:

[REDACTED]

[REDACTED] g>

Filename: image001.jpg

Last Modified: Wed Sep 06 11:03:35 CDT 2023



HIA

Hearing Industries
Association

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Boiler and Pressure Vessel Board
Date: Wed Sep 06 2023 11:14:21 CDT
Attachments: image001.png

Regarding: BCID 12, 89.14

As a manufacturer's representative of commercial hydronic boilers and pressure vessels I'm concerned with the recommendation to eliminate the Boiler and Pressure Vessel Board.

1. Without the boiler board, who makes recommendations for boiler and pressure vessel code changes?
2. Who will the State of Iowa rely on for accurate information to make informed decisions that pertain to the boiler code? The current board has includes members that are Licensed Professional Engineers with the State of IA that practice in the design of Hydronic and Steam boiler systems and Members that sale new boilers, replacement boilers, and service boilers and pressure vessels in the state of IA.
3. Our current boiler code is outdated and needs to be updated. Without the boiler and pressure vessel board will the sate of Iowa adopt national code?

Thanks,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



Owner:

[REDACTED]

Filename: image001.png

Last Modified: Wed Sep 06 11:14:21 CDT 2023



Page 001 of 001

Attachment 1 of 1

for Printed

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc: Jon Murphy <jon@lobbyiowa.com>; IA-ASLA
<ia-asla@assocserv.com>
Bcc:
Subject: IA ASLA's Comments for Boards & Commissions Review Committee
Date: Wed Sep 06 2023 11:18:38 CDT
Attachments: image003.jpg
image004.png
image805791.png
Letter Opposing Board Consolidation 2023-09-6.pdf

Dear Sir/Madam,

Attached, you will find the comments from the Iowa Chapter of the American Society of Landscape Architects (IA ASLA) concerning the preliminary recommendations of the Boards & Commissions Review Committee.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Owner:

[REDACTED]

Filename: image003.jpg

Last Modified: Wed Sep 06 11:18:38 CDT 2023

ASLA

IOWA

Owner:

[REDACTED]

Filename: image004.png

Last Modified: Wed Sep 06 11:18:38 CDT 2023



image004.
for Printed
685 (
Attachment
4)

1221

Owner:

[REDACTED]

Filename: image805791.png

Last Modified: Wed Sep 06 11:18:38 CDT 2023



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100

Owner:

[REDACTED]

Filename: Letter Opposing Board Consolidation 2023-09-6.pdf

Last Modified: Wed Sep 06 11:18:38 CDT 2023



September 6, 2023

[Redacted]

The Honorable Kraig Paulsen
Chairman, Boards and Commissions Review Committee
State Capitol
1007 East Grand Avenue
Des Moines, Iowa 50319

Subject: Landscape Architectural Examining Board's Autonomy and Equitable Representation

Dear Chairman Paulsen,

I am writing to you in my capacity as the President of the Iowa Chapter of the American Society of Landscape Architects (IA ASLA). Our organization is deeply committed to upholding the standards and integrity of the landscape architectural profession within the state of Iowa. We wish to address a matter of utmost importance that directly impacts the future of our profession: the potential consolidation of the Landscape Architectural Examining Board.

Licensed in all 50 states and the District of Columbia, landscape architects are design professionals, who focus on nature-based stormwater management, sustainable development, livable communities, planning, natural resource preservation, recreation spaces, water conservation and most importantly, public safety. The expertise that we bring to the design table truly benefits the communities we live in and the State of Iowa that we love. Our work can be seen throughout Iowa, such as the Iowa State Capitol, West Terraceⁱ; Des Moines' Cowles Commons Plazaⁱⁱ; Davenport's Mississippi River Flood Resiliency Planⁱⁱⁱ; Ames' ADA Hayden Park^{iv}; Iowa City's Pedestrian Mall Improvements^v; and hundreds of other public and private projects in Iowa's communities big and small. It's the landscape architect's responsibility to ensure these designs create healthy, safe, and resilient natural and built environments.

We understand that a review committee has been exploring the possibility of consolidating the Landscape Architectural Examining Board with the Architectural Examining Board. While we acknowledge the potential benefits of streamlining administrative processes, we are also concerned about the implications this consolidation might have on the profession of landscape architecture and the representation of our interests.



Landscape Architecture is a distinct profession with rigorous requirements for education, experience, and examination. The Landscape Architectural Examining Board plays a crucial role in ensuring that landscape architects practicing within our state are held to the highest standards of competence and ethics to ensure public health, safety, and welfare. It is an entity that possesses specialized knowledge of our field and is well-equipped to address the unique challenges and opportunities that landscape architects face. We firmly believe that maintaining a distinct Landscape Architectural Examining Board is essential to preserving the professional independence and expertise of landscape architects.

At the same time, we recognize that administrative efficiencies can be gained through consolidation and welcome the opportunity for all stakeholders be involved in this conversation. However, we request that careful consideration be given to the composition of a combined board to ensure that landscape architects retain their independent voice and representation. A balanced representation that includes knowledgeable and dedicated landscape architects is critical for informed decision-making that impacts our profession.

We kindly request that you take our concerns into account and consider the following points:

- 1. Equitable Representation:** In the event of consolidation, it is imperative that landscape architects have equal representation on the board. This representation should reflect the diverse expertise and backgrounds within the landscape architectural community. A singular board, with unequal representation, may create conflict-of-interest dilemmas and have far-reaching impacts — regulatory and economic. Without equal representation, architects will have sole regulatory voting control over the landscape architecture profession. Unequal representation will consign landscape architects to a reduced position of authority and may impact the future best-interests of the profession and market competition.
- 2. Preservation of Expertise:** Landscape architects possess unique expertise in areas such as nature-based stormwater management, multi-modal transportation systems, ecological design, outdoor recreation and gathering spaces, and sustainable development. A consolidated board should ensure that this expertise is retained and utilized for the benefit of all Iowans where they live, work, and play.
- 3. Collaboration and Consultation:** Prior to any decision regarding consolidation, we respectfully request that the Iowa Chapter of ASLA and other relevant stakeholders be engaged in meaningful consultation to provide valuable insights and perspectives.

We understand that the ultimate goal is to improve the efficiency of administrative processes, and we firmly believe that this can be achieved while preserving the distinct identity and representation of landscape architects in Iowa.

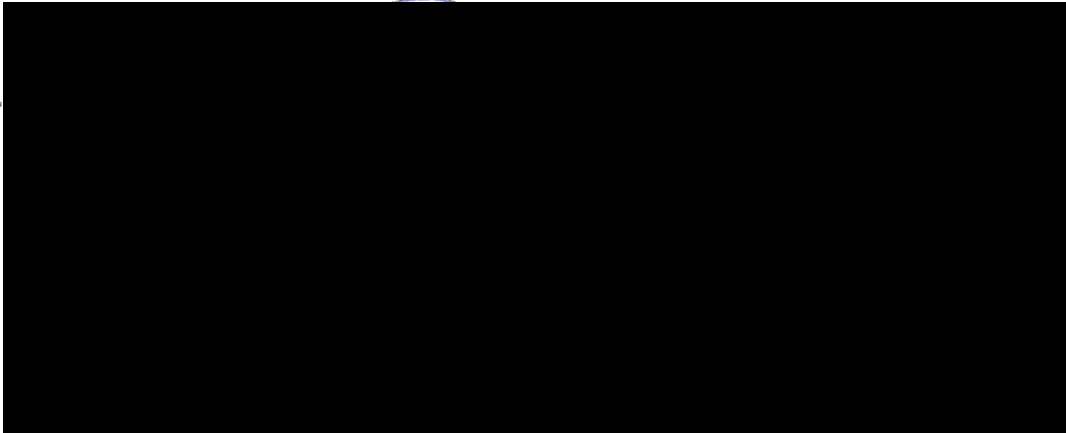


ASLA
IOWA

Thank you for your attention to this matter. We are hopeful that with your support, we can maintain a Landscape Architectural Examining Board that both upholds professional standards and safeguards the public's health, safety, and welfare within our great state.

Please feel free to reach out to me directly at [REDACTED] if you have any questions or require further information. We greatly appreciate your time and consideration.

Sincerely,



ⁱ <https://www.thinkconfluence.com/what-we-do/campus-district-vitality/iowa-state-capitol-west-terrace>

ⁱⁱ <https://www.rdgusa.com/work/project/cowles-commons/>

ⁱⁱⁱ <https://www.sasaki.com/projects/mississippi-river-flood-resiliency-plan/>

^{iv} <https://www.snyder-associates.com/projects/ada-hayden-park/>

^v <https://genus-la.com/work/iowa-city-pedestrian-mall-improvements/>

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic Training Licensure
Date: Wed Sep 06 2023 11:19:03 CDT
Attachments:

To whom it may concern,

My name is [REDACTED] and I am a clinical athletic trainer at the University of Iowa Hospitals and Clinics Orthopedics Department. I am a current resident of Cedar Rapids, Iowa, a Board Certified and Iowa Licensed athletic trainer, and a preceptor within the MSAT program at the University of Iowa.

It has come to my attention that there is a possibility that you will be eliminating the Licensure Board, and subsequently, the licensure of Athletic Trainers in the state of Iowa. I am reaching out to express my concerns if athletic trainers are no longer licensed in the state of Iowa. As of now, 47/50 states have a licensure in place and 49/50 have some form of regulation of the athletic training profession. The addition of Licensure on top of the Athletic Training Board of Certification (BOC) means we are holding athletic trainers to the highest standard of care by keeping up to date with best practices and continuing education.

As an athletic trainer who completed their education in Iowa, is originally from Iowa, and currently practicing in the state of Iowa, it makes me extremely sad to know our state is considering eliminating the Licensure Board, including licensure for athletic training. I fear this will look poorly on our state and will result in a mass exit of current athletic trainers in this state to look for jobs in a state that does have a Licensure Board. This may not affect you directly, but if you have a child currently in high school, they may be affected by not having an athletic trainer at their games/practices/schools to provide care in emergency and non-emergency situations. This will affect our college student-athletes who will not have the highest qualified individuals caring for them. It will affect our general public, as many current Iowa athletic trainers work in a clinic setting and provide coverage to numerous outreach events across the state every week.

I ask you to please vote against the elimination of the Licensure board.

Thank you for your time.

Best,



From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Professional boards - Electric Examining
Date: Wed Sep 06 2023 11:20:43 CDT
Attachments:

As a member of the Iowa Electric Examining Board, we work diligently to insure the licensed electricians perform work according to the National Electric Code (NEC), Iowa State Code, and Administrative Rules - this includes continuing educations hours, license renewal, as well as specifications for work products.

Our inspectors do an awesome job to insure every permitted work site meets Code, driving many miles criss-crossing the state for timely inspections.

The work is specific to electrical work, detailed, and is a public safety concern if electric work does not meet code, is substandard, or not permitted.

I am aware of other professional boards, i.e. plumbing, that is faced with similar situations.

Hopefully, your recommendation is to keep the IEEB in place along with inspectors to protect all lowans as well as transient visitors--no mater how long they remain in our state -- or driving through the state.

Respectfully,

[REDACTED]

[REDACTED]

From: [REDACTED], ATC
<marenc Carroll@gmail.com> <marenc Carroll@gmail.com>
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Iowa athletic training licensure
Date: Wed Sep 06 2023 11:31:48 CDT
Attachments:

Good morning esteemed government representatives:

As an athletic trainer in Iowa, it is a great concern to me that my profession might lose its licensure in our great state.

Licensing athletic trainers protects our children and adults from being cared for by individuals not properly certified, not taught CPR and other life saving measures, and those who pretend to understand orthopedic injuries but actually don't.

We need a certified athletic trainer on every sideline, because the alternative is osteopaths, holders of associate's degrees, or even massage therapists who can't properly care for athletic injuries.

The Board of Licensure helps provide scope of practice guidance to the highly qualified individuals that are licensed in Iowa.

The Board of Licensure does not cost the state money, as licensing fees pay for the expenses every year. It only saves money in unnecessary medical expenses for athletes who are either uninsured or underinsured. If an athletic trainer is at a high school, they can care for injuries instead of the Medicaid athletes going to the doctor and physical therapists and costing the state more money.

Thank you for your time.

Thanks,

[REDACTED]

From: [REDACTED]
[REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Boards & Commissions Review Committee
Date: Wed Sep 06 2023 12:13:04 CDT
Attachments: image001.jpg

To Whom it may Concern,

I couldn't agree more with recommendation to allow the most qualified lowans to serve on Boards and Commissions by repealing the arbitrary gender-balance requirement. Boards & Commissions Review Committee, Subcommittee Recommendation #5.

However, the removal of the Boiler and Pressure Vessell Board is something that I would consider a big mistake. My biggest concern is that in the future that this decision will be looked back upon as the root cause of, fill in the blank catastrophe.

The Boiler and Pressure Vessel Board serves a function that would need to be established before it is removed or replaced. The Boiler Board is the only venue for filing for appeals from inspection reports, and variances or Waiver requests. Both are avenues that are extremely important to the Owners of the equipment as sometimes the inspectors are wrong, they are just people and can make mistakes too. Just last week I had a customer who received a violation that had verbiage in it that just didn't make sense and I found out that it was a copy and paste error.

The biggest reason we need a Board to appeal to is that without them it would be akin to having police without a judge and jury. I have found the current commissioned state boiler and pressure vessel inspectors to be well intentioned people however there is always alternate perspectives and people/institutions need somewhere to have their case heard.

Thank you,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Owner:

[REDACTED]

Filename: image001.jpg

Last Modified: Wed Sep 06 12:13:04 CDT 2023

image001.jpg for Printed Item: 6
Page 118 (back of 221 of 1)

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: The proposal to fold the Board of Psychology into a general Behavioral
Science Board
Date: Wed Sep 06 2023 12:22:29 CDT
Attachments:

My name is [REDACTED] I am a retired psychologist who practiced in Iowa more than 30 years prior to my retirement from active practice, I was president of the Iowa Psychological Association for two terms and served in many roles in the association during my career. I worked extensively with lobbying both in Des Moines and Washington DC to create an environment that responded to the mental health needs of Iowans and the citizens of the United States.

The Iowa Board of Psychology has served Iowa well to create an environment where the needs and safety of Iowa residents are served and protected. Several areas of practice are unique to psychology and the members of other behavioral science boards are not well positioned to continue the development of the future services provided by psychologists. During the time I was a member of leadership in the Iowa Psychological Association we worked with the legislature to pass and implement a program for psychologists who completed a postdoctoral masters degree in Clinical Psychopharmacology to prescribe appropriate mental health medications. Iowa has been an underserved area for many years and this program was developed specifically to increase the number of trained mental health professionals in rural areas where the largest areas of underserved residents reside. The demand for mental health services has increased dramatically since the onset of covid. Changing the manner that Psychology is regulated in Iowa at this time will significantly slow the implementation of a larger workforce with the expertise to care for mental health problems in rural communities.

The Iowa Psychology board had been a self funded board and the combination with a general behavioral board should have no appreciable impact on state finances.

I strongly recommend that you not fold the Board of Psychology into a Behavioral Science Board.

Sincerely,

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic training licensure
Date: Wed Sep 06 2023 12:26:24 CDT
Attachments:

To whom it may concern,
As a parent with children involved in activities this is an important area to discuss.

I am writing regarding the proposed license elimination for athletic trainers in the state of Iowa. Please note the following:

- * There are over 1,100 licensed athletic trainers in the state of Iowa.
- * The renewal fees that ATs pay fully funds the AT Board and is not a cost to the state.
- * The AT license protects the health, safety, and welfare of the public by ensuring that the ATs in the state are the qualified healthcare providers that athletes in Iowa deserve.
- * The AT Board evaluates our scope of practice and adapts that based on the rapidly changing world of healthcare. If the Board is eliminated, other healthcare providers will have influence over our scope of practice.
- * Other states, like South Carolina moved towards licensure. Thus 49/50 states have regulation. This action would make Iowa, like California, not requiring licensure for ATs.
- * The elimination of AT licensure may reduce the willingness of graduating students to stay in the state. It may also lead to currently licensed ATs leaving the state. We are already experiencing difficulty hiring ATs across the state, this would just increase the struggle, specifically in rural schools.
- * ATs appear in the Iowa Code as licensed healthcare providers, specifically in the recent concussion law that was signed, declaring ATs as licensed healthcare providers.

Please keep practice standards in place to ensure the right people are caring for our athletes.

Sincerely,

[REDACTED]

From: [REDACTED]
[REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>; adam.zabner@legis.iowa.gov
<adam.zabner@legis.iowa.gov>; janice.weiner@legis.iowa.gov
<janice.weiner@legis.iowa.gov>
Cc:
Bcc:
Subject: Athletic Trainers Licensure
Date: Wed Sep 06 2023 12:45:33 CDT
Attachments:

Dear Board and Commissions Committee, and Senator Janice Weiner,

I am emailing you to protest the recommended elimination of the state requirement for athletic training licensure and the state Board of Athletic Training. State licensure protects our patients and ensures us that our athletic training staff are properly trained, undergoing continuous education requirements, and monitored. The board protects the scope and practice guidelines for our staff under the University of Iowa.

Athletic trainers are healthcare professionals who specialize in the prevention, diagnosis and intervention of emergent, acute, and chronic medical conditions involving impairment, functional limitations, and disabilities. Our athletic training staff have graduate degrees to specialize as a healthcare provider to provide this care to our patients.

Licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS) and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.

We do not want to continue to make decisions at a state level that drives young professionals away from Iowa for better jobs elsewhere. This decision would do just that.

Sincerely,

[REDACTED]

[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc: Gangestad, Sydney
<sydney.gangestad@dentons.com>; Coonan, Tim
<tim.coonan@dentons.com>
Bcc:
Subject: BCRC Public Comment: IPAS
Date: Wed Sep 06 2023 13:34:33 CDT
Attachments: IPAS Boards Commissions Comment Letter 09.06.2023.pdf

Boards and Commissions Review Committee,

Thank you for the opportunity to provide comment to the Boards and Commissions Review Committee (BCRC). Tim Coonan and Sydney Gangestad at Dentons Davis Brown represent the Iowa Physician Assistant Society; IPAS respectfully submits the following comment to the BCRC's preliminary recommendations released on August 29, 2023.

IPAS is available to serve as a resource to the BCRC. Please let us know if you have any questions about the PA profession or current administration of the profession.

Thank you,

Marisa

Marisa Morris

Government Relations Coordinator

My pronouns are: (she/her)

+1 515 246 7962

marisa.morris@dentons.com | Website

Dentons Davis Brown PC | The Davis Brown Tower, 215 10th Street, Suite 1300, Des Moines, IA, 50309, United States

Our Legacy Firms | Client Experience (CX)

Dentons is a global legal practice providing client services worldwide through its member firms and affiliates. This email may be confidential and protected by legal privilege. If you are not the intended recipient, disclosure, copying, distribution and use are prohibited; please notify us immediately and delete this copy from your system. Please see [dentons.com](https://www.dentons.com) for Legal Notices.

Owner: Morris, Marisa <marisa.morris@dentons.com> on behalf of Morris, Marisa <marisa.morris@dentons.com> <marisa.morris@dentons.com>
Filename: IPAS Boards Commissions Comment Letter 09.06.2023.pdf
Last Modified: Wed Sep 06 13:34:33 CDT 2023



Iowa Physician Assistant Society

6919 Vista Drive
 West Des Moines, IA 50026
 ph: (515) 282-8192 fax: (515) 282-9117

September 6, 2023

Chairman Paulsen,

The Iowa Physician Assistant Society (IPAS) thanks you for the opportunity to provide comments on the Board and Commission Review Committee's preliminary recommendations released on August 29, 2023.

We recognize the important charge of your committee – achieving efficiencies and improving the effectiveness of state government – and we share those aims related to the regulation of the PA profession. We urge the committee to consider the important ways the PA Board has helped advance these principles since its inception in 1988 and we respectfully ask that the committee ensure future recommendations preserve the Board's autonomous structure.

Like a growing number of states, Iowa created a separate and autonomous PA Board to ensure informed regulation of the PA profession and avoid unnecessary restrictions imposed upon the profession with anticompetitive intent. The PA Board's structure – a majority of PA members with representation from a broad spectrum of practice settings – provides Iowa's PAs with meaningful participation in the regulation of their own profession, akin to what is already afforded to physicians, nurses, and other healthcare professionals.

The PA profession has grown in Iowa and across the country in recent years and the Bureau of Labor Statistics [projects](#) the profession to grow by nearly 30 percent over the next decade. As the profession has grown, so has its importance to the delivery of healthcare. PAs practice in every specialty and setting, often managing their own patients. In fact, nearly 70 percent of U.S. adults have seen a PA according to a recent [Harris poll](#) commissioned by the American Academy of PAs and, in Iowa, the average PA sees approximately 60 patients per week. The PA profession's impact is especially felt in rural Iowa, with 40 percent of the state's PAs practicing in Iowa's rural towns.

Recognizing the important role that PAs play in meeting the health care needs of Iowans, the state legislature passed HF 424 this year. This new law – which Governor Reynolds [lauded](#) as a “common sense approach” – allows PAs in Iowa to practice autonomously. That is why it is more important than ever that Iowa's PA professionals maintain an independent regulatory body comprised of PAs who have current knowledge of the profession.

An alternative regulatory structure, particularly one whose membership is comprised of non-PA members who may not have current knowledge of the profession, undermines the profession. Additionally, a regulatory board comprised of non-PAs could view PAs as a market competitor, leading to regulations and policies that are anti-competitive and not evidence based. Such risks

not only threaten the efficacy of the state's regulatory efforts but could jeopardize patient interests.

IPAS respectfully requests that your final recommendations recognize the importance of Iowa's autonomous PA Board in the effective regulation of the PA profession. On behalf of Iowa's 1,300+ PAs, our membership stands ready to be a resource to your committee and pledge our commitment to the effective administration of the profession.

Sincerely,

[Redacted signature]

[Redacted address]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Board Combination - Chiropractic
Date: Wed Sep 06 2023 13:48:09 CDT
Attachments:

Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- * This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- * This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- * We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,

[REDACTED]

[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<brcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Iowa CareGivers Comments Re Streamlining of Licensing and Certification System - Recommendation #8
Date: Wed Sep 06 2023 13:57:25 CDT
Attachments:

Dear Director Paulson and Members of the Boards and Commissions Review Committee:

REGARDING RECOMMENDATION 8

Implement clear, consistent, and efficient licensing standards to reduce barriers to entry into the workforce.

Director Paulsen, in one of your summary statements of recommendation #8, you stated the need to "streamline the state's licensing and certification boards into a "system". In the written version you state the rationale to "reduce barriers to entry into the workforce" which we agree with. However, we believe the benefits or unintended consequences for recommendation #8 go far beyond "reducing barriers to entry into the workforce," and our comments align more with your explanation of #8.

We support charging DIAL with establishing a licensing and certification "system" and particularly for the health professions to:

- integrate the direct care worker registry into a newly established licensing and certification "system" rather than an often outdated, ineffective, and difficult to manage stand-alone database linked to a very outdated federal law.

- create a more efficient and cost-effective system.

- ensure access to accurate workforce supply and demand data and analysis are maintained.

- assure quality of care and public safety for Iowans of all ages and abilities, regardless the setting by providing adequate training and portable health care workforce credentials.

- reduce health care costs associated with high workforce turnover and shortages, hospital readmissions, and much more.

The lack of adequate and portable training and skills contribute to high turnover of certified nurse aides (CNAs) and other direct care workers... an occupation that has experienced high turnover rates for decades and certainly long before the COVID 19 pandemic. The pandemic just made it worse. It is essential that the workforce feel adequately prepared to do what is expected of them in what are often life or death situations. Waiving the education and training

for nurse aides in nursing homes during the pandemic resulted in poor care and tragic outcomes for too many. This is no time to be reducing training standards for these front-line workers. If employers want a stable and well-prepared health and long-term care workforce, the issues must be viewed through the lenses of all who are impacted. Thank you for your consideration.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Athletic trainers
Date: Wed Sep 06 2023 14:01:33 CDT
Attachments:

I'm sad and concerned to hear that Iowa is considering to allow "athletic trainers" without a athletic trainer degree. Our daughter has torn her ACL twice in high school and having the trainer know what to look for medically was a huge comfort. She was immediately on the scene to evaluate her and suggested physicians to see for a confirmation. She was also there to work with her during her therapy. Our trainer was also part of the PT group so she knew what she would be working on to recover and during practice times our daughter could be doing exercises recommended by the PT.

Having attended many sporting events over the years and seeing injuries it is so important to have licensed athletic trainers in attendance. They are there to evaluate injuries immediately. Help coaches, athletes and parents determine if an athlete should be able to continue to participate or needs to sit out and be evaluated further. Having them available is for the safety of young people, they take the decision out of coaches and parents hands which in my opinion is huge. So please for the health and safety of young athletes, demand licensed athletic trainers!

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Keep Athletic Training Licensure
Date: Wed Sep 06 2023 14:21:42 CDT
Attachments:

To the government of Iowa,

I ask that you reconsider your recommendation of eliminating licensure for the medical profession of Athletic training. Athletic Trainers are the backbone of sports safety and are essential in keeping middle school, high school, collegiate and all other athletes healthy and able to perform in a safe way.

1. According to Iowa law 280.13C, Which is the law concerning concussion management in schools. Athletic trainers are listed as a licensed medical providers. That law 280.13C(5b) also states that students with a suspected concussion have to be evaluated by “a licensed health care provider trained in the evaluation and management of concussions”.

a. If your proposed licensure elimination goes through then according to the law, athletic trainers would no longer be able to manage concussions. This would greatly increase unnecessary doctor visits to PCP providers, who are less trained in concussion management, to manage the concussion. This hurts rural Iowa even more by taking up valuable time of our stretched PCPs and increases health care cost. I provide my athletic training services to the students at our contracted schools free of charge and meet them at school.

b. This would mean the majority of high schools in the state and likely all of the rural schools would be unable to follow the state concussion law in a satisfactory way. Kids would either be forced to sit out for long periods of time with concussions without adequate management of the return to play or concussed athletes would not be identified and removed from sport leading to long term cognitive damage.

2. The medical practice of athletic training is a licensed field in 49 of the 50 states. To eliminate licensure in Iowa would be going backwards and make the state of Iowa less attractive to athletic trainers seeking employment

a. There is already a shortage in qualified athletic trainers in the state of Iowa. The state of Iowa recognizes this as well. Athletic trainers are included in the health provider recruitment program. It seems counterintuitive to say we need to recruit these healthcare providers and then eliminate them.

b. I will say for myself if athletic training licensure is eliminated, I would strongly consider

leaving medicine and move to another field. My athletic trainer colleague would likely leave the state. We provide very low cost healthcare to 7 rural Iowa school districts. If we leave those athletes would be unserved.

c. We must support the rural districts to provide the best experience for the students. I, working in the rural setting, am on the front lines taking care of these kids. I have seen what happens at other schools that have lost their athletic training services due to lack of workers. The loss of licensure would harm these areas even more by pushing highly qualified healthcare providers out of state because of lack of basic professional occupational protections from the state.

3. Elimination of the licensure would lead to harm to the public.

a. Athletic training requires a master's degree of education, a passing score on a board of certification examination, the maintenance of knowledge, skill, and competence through continuing education. We are highly trained and educated professionals that need the protections of licensure. This is the same amount of education that physician assistants (PA) require.

b. Without licensure, anyone, could pass themselves off as an athletic trainer and provide inadequate or dangerous services to the public and there would be no recourse or protection of the public. Students at are school would undeniably be harmed by this proposed move.

4. The board of athletic training does not cost the state of Iowa or tax payers any money. The boards functions are all paid for through dues and fees of our professional members.

a. Combining our profession with other similar fields such as physical therapy, occupational therapy with the preservation of our licensure may satisfy your desire to streamline this part of the government.

I hope that the committee recognizes their error in the recommending the elimination of athletic training licensure. I really hope that the committee learns that athletic trainers are highly trained and qualified health care providers and deserve the protections provided by state licensure.

Sincerely,

[Redacted signature]

[Redacted address line 1]

[Redacted address line 2]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Maintaining Iowa Board of Athletic Training
Date: Wed Sep 06 2023 14:59:05 CDT
Attachments:

Hello,

My name is [REDACTED] and I am an athletic trainer in NW IA. I am entering my second year of being a licensed athletic trainer. To get where I am today, I completed 5 years of education, which included a bachelor's degree in Exercise Science and a MSAT degree from a CAATE accredited program at South Dakota State University. I was fortunate to have amazing professors within the program.

Athletics are becoming a huge part of young athletes lives. With more opportunities for athletes to participate in sports year around comes an increase in injuries. As athletic trainers, we are the front line at sporting events for medical care. We have to be ready for a multitude of different injuries that can occur at any moment. Without the education, preceptors, or professors that I learned from I would not be the high quality athletic trainer that I am today. Within our education, we learn about general medical conditions, acute care, athletic injuries, and so much more. We are the lifeline that athletes go to first in most circumstances related to their health. In recent years, we have been challenged in the area of mental health. This is a massive crisis within our adolescents and young adults. Within my MSAT courses, we were instructed on how to recognize signs and symptoms of mental health issues. In addition, within rotations I was exposed to situations where mental health crisis's occurred and saw how they were dealt with.

Athletic Training is more than taping ankles and adhering Band AIDS. It is a profession that works with athletes in the areas of injury prevention, assessment, management, treatment, and rehabilitation of injuries. We are a lifeline for athletes in time of need and we want to be well educated to provide them with exceptional care that will elevate them to be the best athlete that they can be. Without the Board of Athletic Training, we will lose the high level of athletic trainers that the state of Iowa requires to practice.

We want all athletes no matter the age in the state of Iowa to be the best that they can be. So why not have the best athletic trainers across the state of Iowa to help these athletes be successful? Why do we want to have the possibility of anyone naming themselves as an athletic trainer? This is unsafe! Safety of an individual is our number one priority as athletic trainers.

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: IOWA Athletic Trainer Licensure
Date: Wed Sep 06 2023 15:17:56 CDT
Attachments:

I am writing to comment on the possibility of Iowa Athletic Trainers losing licensure. I strongly oppose this idea for the following reasons:

* We currently have 1,129 ATs who are licensed and countless students who rely on licensing.

* That licensure protects the public and lets clients and employers easily know an AT is properly trained, taking continuing education, and monitored.

* The Board helps provide scope of practice guidance and protects the public from untrained persons.

* There is no expense associated with the Board of Athletic Training. The fees that ATs pay to renew their license cover all costs. They are cost-effective and are consistently in the black each year.

* Every state (except California who has pending legislation) and Washing D.C require licensure for ATs

* Athletic trainers are healthcare professionals who specialize in the prevention, diagnosis and intervention of emergent, acute and chronic medical conditions involving impairment,

functional limitations and disabilities.

* Athletic trainers provide medical services to all types of patients. Across the United States, in addition to practicing in traditional sports team settings, athletic trainers work in performing arts, public safety, occupational health, and with the armed forces.

* Licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.

* Eliminating licensure in IA could potentially impact an AT's ability to practice across state lines (travel with their team), depending on regulatory requirements in other states. (ex. some states allow you to practice in their state temporarily, provided your home state maintains the same regulatory requirements)

Please do not let the Iowa Athletic Trainer Organization be eliminated. This would be a big disservice to our active community.

Sincerely,

[Redacted signature]

[Redacted contact information]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Public Comment re: Iowa Boards & Commissions Recommendations
Date: Wed Sep 06 2023 15:30:01 CDT
Attachments:

>From a voting citizen of Iowa:

As someone who has experienced personally the compassionate dedication of the direct care workers who care for our family, our friends, and ourselves, I understand that one of the challenges from direct care workers' perspective is a lack of a common registry to maintain their training and certification status. We have an opportunity to have DIAL create a system that merges the various health care licensing boards into a single system that incorporates the direct care worker registry that already exists at DIAL.

Thank you for seriously considering this improvement to the registry as part of the current actions to consolidate and improve Iowa's Boards and Commissions.

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Reasons to Keep Athletic Trainers Licensed
Date: Wed Sep 06 2023 15:44:34 CDT
Attachments:

To Whom it may Concern,

My name is [REDACTED] and am currently in my 4th year as an undergrad athletic training major at University of Northern Iowa. I have been around sports practically my entire life. It was always a comforting feeling knowing a licensed athletic trainer or emergency personnel was always onsite during practices, games, and events. If you take away the licensing requirement for athletic trainers, you are taking away the requirement for athletic trainers to prove they are competent in their field.

As a student, there is a comfort knowing that I will be required to prove my knowledge and competency of athletic training requirements to a board. I want to be able to tell my future athletes and coaches that I, in fact, am fully certified and licensed to provide medical care. When looking a few years ahead, if I were to ever be sued for wrongdoing, I want to be able to prove that I am a fully licensed athletic trainer who has proven my competency to a board above me.

Another concern I have in regards to the revoking of licensure for athletic trainers in Iowa is what would stop some people that just have a bachelors or a masters in athletic training from practicing? One can simply learn what they need to in order to pass a class where as being able to accurately apply what they know into real life situations. It's one thing to pass a few classes and show you know the material, it is completely different when you have to physically apply what you know. The Board examination for athletic trainers ensures that the standard of care is the same for all athletic trainers in Iowa. Just imagine how you would feel knowing yourself, child, or family member is being cared for by an incompetent athletic trainer??

Additionally, a situation to think about that happened recently is Damar Hamlin. If those athletic trainers and medical professionals were not licensed and had no requirement to prove they knew what they were doing, would he even still be alive? The knowledge, clinical hours, observation hours, and PROVING their competency through a Board examination is truly what saved Damar's life.

Sincerely, [REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Keep Athletic Training licensure and the State Board of Athletic Training!
Date: Wed Sep 06 2023 16:06:26 CDT
Attachments:

To Whom it may concern:

It has come to my attention that the State of Iowa is considering eliminating the licensure for Athletic Training and the State Board of Athletic Training. This cannot happen! The State of Iowa must keep athletic training licensure and the state Board of Athletic Training. This is imperative as athletic trainers are healthcare providers that provide medical care to athletes and patients across the state. I know several Certified Athletic Trainers and they are vitally important for all athletic teams in high school and college. Here are some very important facts about Athletic Trainers listed below:

- * We currently have 1,129 ATs who are licensed and countless students who rely on licensing.
- * That licensure protects the public and lets clients and employers easily know an AT is properly trained, taking continuing education, and monitored.
- * The Board helps provide scope of practice guidance and protects the public from untrained persons
- * There is no expense associated with the Board of Athletic Training. The fees that ATs pay to renew their license cover all costs. They are cost-effective and are consistently in the black each year.
- * Every state and Washington D.C require licensure for ATs, except for Hawaii (which requires registration) and California (who has pending legislation).
- * Athletic trainers are healthcare professionals who specialize in the prevention, diagnosis and intervention of emergent, acute and chronic medical conditions involving impairment, functional limitations and disabilities. (you could include your educational requirements here)
- * Athletic trainers provide medical services to all types of patients. Across the United

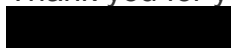
States, in addition to practicing in traditional sports team settings, athletic trainers work in performing arts, public safety, occupational health, and with the armed forces. (Here is some statistical data on AT settings: <https://members.nata.org/members1/documents/membstats/index.cfm>. You will need to be logged into the website to access this page. Click on the July 2023 link, and “JobSettingCertified” at the very bottom of the page.)

* Licensure provides the highest level of patient protection for the public’s safety, and it is the standard form of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.

* Eliminating licensure in IA could potentially impact an AT’s ability to practice across state lines (travel with their team), depending on regulatory requirements in other states. (ex. some states allow you to practice in their state temporarily, provided your home state maintains the same regulatory requirements)

Keep Athletic Training Licensure and the State Board of Athletic Training in Iowa.

Thank you for your time,



From: [REDACTED]
To: BCRCcomments@iowa.gov
<brcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Board of Dietetics and the Local Food and Farm Program Council
Date: Wed Sep 06 2023 18:50:21 CDT
Attachments:

To whom this may concern,

My name is [REDACTED]. I am a registered and licensed dietitian nutritionist, and writing to let you know that I strongly disagree with the elimination of the Board of Dietetics, our licensure, and the Local Food and Farm Program Council.

The Board of Dietetics exists to protect Iowa citizens from unethical, harmful nutrition care. Similar to other healthcare professions, becoming a dietitian involves completing a rigorous, evidence-based curriculum and supervised internship, passing a qualification exam, and taking yearly continuing education.

The Local Food and Farm Program Council exist to connect and educate consumers, producers, and communities for a strong and productive local food system with population health in mind. How our food is grown, processed, and packaged really does matter. Our food choices influence our health, the quality of our environment, jobs in our community, and the culture and diversity of our society. Keeping our local farmers and producers in business supports our local economy. Dollars spent close to home tend to stay close to home. Most of the food we eat travels an average of 1,500 miles from the farm to our table. By reducing the travel distance our food takes, we save energy and reduce carbon dioxide emissions that likely contribute to global warming. By buying whole local foods, we also reduce packaging, further saving energy and resources. And conservation farming practices protect the quality of our water and soil, while preserving green space for healthy native habitats.

Licensure is particularly important in the context of medical nutrition therapy, which is specialized nutrition care seen in hospitals, clinics, long-term care, and private practice. Through MNT, dietitians manage various medical conditions: diabetes, kidney disease, malnutrition, GI disorders, and nutrition support through feeding tubes or IV; as well as providing nutritional guidance within the setting of surgeries, drugs or treatments. This is just a partial list.

Further, the livelihood of many Iowa dietitians depends on their services being reimbursed by payers who require that healthcare professionals be licensed in order to receive reimbursement. It is in Iowa law that MNT and therapeutic diets MUST be provided by licensed and registered dietitians in order to receive insurance payment.

On a national level, the Academy is working to streamline licensure by introducing an interstate

compact. We strongly support this effort as it would significantly ease the burden of Iowa dietitians needing to be licensed in multiple states; and, with the increase of telehealth, broadens the income opportunities of dietitians. The Compact would also support active duty military and their spouses. We need to retain licensure in order to hold Compact privilege.

My request:

1. Retain the Iowa Board of Dietetics.
2. Retain licensure of registered dietitians and dietitian technicians, registered.
3. Retain the the Local Food and Farm Program Council

Best Wishes,

[Redacted]

[Redacted]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Comments Regarding Board of Dietetics Recommendations
Date: Wed Sep 06 2023 19:16:39 CDT
Attachments: CR_ Comments Regarding Board of Dietetics Recommendations.pdf

Dear Members of the Boards and Commissions Review Committee,

Please see the attached input regarding this committee's recommendations to eliminate the Board of Dietetics and dietetics licensure.

Thank you,

[REDACTED]

--
--

[REDACTED]

Owner:

[REDACTED]

Filename: CR_ Comments Regarding Board of Dietetics Recommendations.pdf

Last Modified: Wed Sep 06 19:16:39 CDT 2023

Dear Members of the Boards and Commissions Review Committee,

My name is [REDACTED] and I am a registered dietitian nutritionist conducting community research aimed at improving the health and wellbeing of aging adults in Iowa. My work and education have included a Bachelor's and Master's in Dietetics and Exercise Science, more than 1200 hours of supervised practice experience at Duke University Hospital, farmers' market management, work as an outpatient cancer dietitian, and I am currently in a Nutritional Sciences Ph.D. program at Iowa State. My experiences have shown me the complexity of nutrition issues at the individual and community level, and how harmful misinformation and nutrition advice from non-experts can be.

I especially witnessed this harm firsthand when I was at my job as a cancer dietitian. Many patients would be following the misinformed guidance of non-licensed nutritionists and health coaches, and by the time they got to me, they were rapidly losing weight, not tolerating treatment well, and were at increased risk of mortality or complications because the person providing them "care" did not understand their unique medical situation.

For this reason and the ones I've listed below, I strongly advise against the elimination of the Board of Dietetics and dietetics licensure as recommended in the report released by your committee last week.

- **RDNs are specialized, highly trained healthcare professionals.** Similar to other healthcare professions with boards recommended to "continue," RDNs must complete rigorous coursework that meets the accreditation standards within the Academy of Nutrition and Dietetics; complete a >1,000 hour supervised practicum; pass a national board examination; and take yearly continuing education.
- **RDNs are uniquely qualified to practice specialized nutrition care or Medical Nutrition Therapy.** RDN's scope of practice allows them to prescribe therapeutic diets to mitigate the effects of acute or chronic disease; to provide alternative nutrition when oral feeding is not possible or unsafe; to counsel individuals who are in need of improved nutrition; and to provide individualized nutritional guidance within the context of specific surgeries, drugs or treatments. Would you want an untrained, unlicensed professional providing that type of care for you, your child, or other loved one?
- **The Board of Dietetics protects Iowa citizens from unethical, harmful nutrition care.** The Board of Dietetics vets licensure applicants to ensure that competent, properly educated, ethically sound individuals practice as RDNs in Iowa. Applicants who have been found to be in felonious violation of the law, derelict, impaired, or negligent in their practice, or who have engaged in practices that are not a part of the RDN's scope of practice are not granted licensure to practice in Iowa. Likewise, licensed dietitian practitioners found to be in similar violation or have not maintained continuing education requirements face sanction from this Board, with the possibility of probation or suspension of the license to practice.
- **Dietetic licensure has become THE standard requirement for employment for most of the 1100+ licensees within Iowa.** Registered Dietitians without licenses are not considered adequately credentialed for hire with healthcare organizations in Iowa.

Infringement on this Board and with Dietetic Licensure would not be conducive to job creation.

- **The livelihood of many Iowa dietitians depends on licensure-required reimbursement.** Licensure provides health insurance companies and state and federal governments with the assurance that practitioners meet standards of professional competence in order to be reimbursed for providing nutrition care services. In Iowa, medical nutrition therapy and therapeutic diets are provided by Registered AND Licensed Dietitians, and it is in Iowa law that these services MUST be provided by Registered AND Licensed Dietitians for insurance payment. This comes into play at the hospital/clinic levels, as well as long-term care facilities.
- **There is no taxpayer expense associated with the Board of Dietetics.** The fees that Licensed Dietitians pay to renew their license cover all costs incurred by the department that provides oversight. This Board has proven to be cost-effective and it operates consistently in the black each year.
- **The Board of Dietetics is efficient with its meetings.** The Board of Dietetics meets quarterly, and as needed. It has held virtual meetings for several years now, when appropriate.
- **The Board of Dietetics compensates its members.** The Board of Dietetics is comprised of both professional and citizen members and these Board members are provided compensation for their service to the citizens of Iowa.
- **Losing licensure would make Iowa dietitians ineligible to participate in an interstate compact.** On a national level, the Academy of Nutrition and Dietetics is working to streamline licensure by introducing an interstate compact. I strongly support this effort as it would significantly broaden the income opportunities of dietitians and access to nutrition care. The Compact would also support active duty military and their spouses. We need to retain licensure in order to hold Compact privilege.

I urge this subcommittee to reconsider the recommendation to eliminate the Board of Dietetics and dietetics licensure when it provides a final report to the Governor later this month.

Thank you for your consideration in this matter.

[REDACTED]

From: [REDACTED]
To: bcrccomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Licensure elimination for Athletic Trainers
Date: Wed Sep 06 2023 19:52:31 CDT
Attachments:

As a Sports Medicine Physician in Iowa for the last 23 years, I would like to emphatically request that licensure for Athletic Trainers continue. Licensure and the Board assure that the athletic trainers, who are the front line of our sports medicine team, are appropriately qualified and maintain quality of care for our athletes.

[REDACTED]

CONFIDENTIALITY NOTICE: This message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message.

The views expressed in this communication are that of the individual and shall not be construed as those of Medical Associates or any of its entities.

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Board of Dietetics and licensure
Date: Wed Sep 06 2023 20:32:43 CDT
Attachments:

My name is [REDACTED]. I am a registered and licensed dietitian nutritionist, and writing to let you know that I strongly disagree with the elimination of the Board of Dietetics and our licensure.

The Board of Dietetics exists to protect Iowa citizens from unethical, harmful nutrition care. Similar to other healthcare professions, becoming a dietitian involves completing a rigorous, evidence-based curriculum and supervised internship, passing a qualification exam, and taking yearly continuing education.

Licensure is particularly important in the context of medical nutrition therapy, which is specialized nutrition care seen in hospitals, clinics, long-term care, and private practice. Through MNT, dietitians manage various medical conditions: diabetes, kidney disease, malnutrition, GI disorders, and nutrition support through feeding tubes or IV; as well as providing nutritional guidance within the setting of surgeries, drugs or treatments. This is just a partial list.

Further, the livelihood of many Iowa dietitians depends on their services being reimbursed by payers who require that healthcare professionals be licensed in order to receive reimbursement. It is in Iowa law that MNT and therapeutic diets MUST be provided by licensed and registered dietitians in order to receive insurance payment.

On a national level, the Academy is working to streamline licensure by introducing an interstate compact. We strongly support this effort as it would significantly ease the burden of Iowa dietitians needing to be licensed in multiple states; and, with the increase of telehealth, broadens the income opportunities of dietitians. The Compact would also support active duty military and their spouses. We need to retain licensure in order to hold Compact privilege.

My request:

1. Retain the Iowa Board of Dietetics.
2. Retain licensure of registered dietitians and dietitian technicians, registered.

Thank you for your consideration.

Sincerely,

[REDACTED]

[REDACTED]

From: [REDACTED]
To: BCRCcomments@iowa.gov
<bcrccomments@iowa.gov>
Cc:
Bcc:
Subject: Letter of comment submission from the Polk County Medical Society
Date: Wed Sep 06 2023 23:01:11 CDT
Attachments: 2023 BCR submission comment.docx

To the Boards and Commissions Review panel:

Please accept the attached comment letter of submission for consideration from the Polk County Medical Society

Get Outlook for iOS

Owner:

[REDACTED]

Filename: 2023 BCR submission comment.docx

Last Modified: Wed Sep 06 23:01:11 CDT 2023



POLK COUNTY MEDICAL SOCIETY

1520 HIGH STREET DES MOINES, IOWA 50309-3110 (515) 288-0172 FAX (515) 288-0173
website: <http://www.pcms.org> email: pcms@pcms.org

[Redacted]

To Whom It May Concern:

We respectfully submit to you that Polk County Medical Society (PCMS) is the oldest and largest Physician led organization in Iowa and represents a membership of almost 2000 Iowa physicians from Polk, Dallas, Madison, and Warren counties. While we are in support of streamlining bureaucracy in principle we worry about unintended consequences for our patients and access to medical care in Iowa. Iowa physicians are particularly interested in potential changes involving the Board of Medicine as well as other boards and committees that impact our profession and ability to provide patient care. This includes the committees overseeing Medical Assistance (i.e. Medicaid), Emergency medical services and Cannabidiol among others.

The process to date has been opaque and largely behind closed doors. Frontline healthcare professionals have a strong interest and deserve a seat at the table during this process. The physicians of Polk County Medical Society respectfully request representation in future meetings that will impact our profession.

Sincerely,

[Redacted signature]

[Redacted signature]



Comments, BCRC <bcrccomments@iowa.gov>

Dietetic Licensure

1 message

Thu, Sep 7, 2023 at 9:38 AM

[REDACTED]
To: "BCRCcomments@iowa.gov" <BCRCcomments@iowa.gov>

In reading some recent political information, it was brought to my attention that the state of Iowa may consider not having Dietitians be licensed by a board. This is of concern for myself as there are several individuals out there that may consider themselves experts in nutrition but have not had the education or experience that a RD has and could cause harm to an individual's health.

It is very important that the state of Iowa only grant Dietitians who have completed all required education and testing to be able to perform Dietetic work within their scope of practice. I highly recommend that we cont to require dietitians to have a license that is governed by a board that can assure these dietitians are practicing in their correct scope that causes no harm to patients. I also do like the idea of having these licensures have interstate compact to be used across neighboring borders similar to nursing license.

Thank you for your consideration.

[REDACTED]



Comments, BCRC <bcrccomments@iowa.gov>

(no subject)

1 message

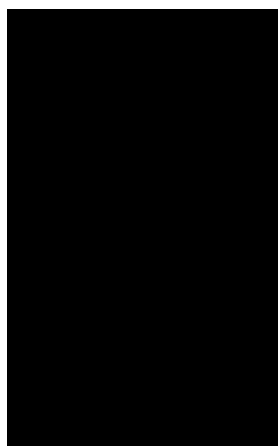
[Redacted]
To: bcrccomments@iowa.gov

Thu, Sep 7, 2023 at 10:16 AM

Hello,

My name is [Redacted], I'm opposed to eliminating the board of athletic trainers because the Board helps provide scope of practice guidance and protects the public from untrained persons, the licensure provides the highest level of patient protection for the public's safety, and there is no expense associated with the Board of Athletic Training. Eliminating the board will cause the following: access to on-site PT for our students and lack of proper training for trainers. This is why I urge the Boards and Review Commission Committee to keep the board of Athletic trainers.

--





Comments, BCRC <bcrccomments@iowa.gov>

Iowa NECA Written comments for the Board and Commission Review Committee

1 message

John Cacciatore <John.Cacciatore@policyworksllc.com>
To: "bcrccomments@iowa.gov" <bcrccomments@iowa.gov>

Thu, Sep 7, 2023 at 10:38 AM

Attached are written comments by Iowa NECA for the Board and Commission Review Committee's consideration.

Thank you

John Cacciatore | *Senior Vice President*

POLICYWORKS

government affairs | public relations

7745 Office Plaza Dr. North, Suite 170 | West Des Moines, IA 50266

P: 515-224-8957 | C: 515-238-6996 |

Web: www.policyworksiaowa.com

 **Board and COmmission comments 9.6.23.pdf**
41K

Boards & Commissions Meeting

Wednesday, September 6, 2023 10:31 AM

- My name is [REDACTED] and I represent the Iowa chapter of the National Electrical Contractors Association.
- The electrical examining board is represented by all sectors of the electrical community in the State of Iowa.
 - Two journeyman electrician, one union and one non-union.
 - 2 master electricians or contractors. One union (NECA) and one non-union.
 - One electrical inspector
 - Two general public members one union and one non-union.
 - One state fire Marshall.
 - One building official from electrical inspections.
 - One member from public utility
 - And a member with an engineering license.
 - All volunteer their time
- As you can see from the list of members, it is very diverse in the fact that all sectors of the electrical community are represented.
- I fear that merging this board with other building trades boards will Diluting the expertise and representation of the board. The safety of Iowans and of the electrical workers will be compromised as well.
- The expertise of the board is needed, and worker safety could be lost.

In closing I would like for you to recommend leaving the Electrical Examining board with the current board structure in place.



Comments, BCRC <bcrccomments@iowa.gov>

Recommendation #8

1 message

Thu, Sep 7, 2023 at 11:03 AM

[REDACTED]
To: "BCRCcomments@iowa.gov" <BCRCcomments@iowa.gov>

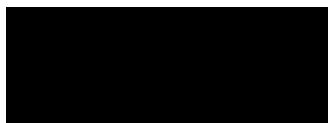
Dear Director Paulson and Members of the Boards and Commissions Review Committee.

As a Council Member with the Iowa CareGivers and a retired CNA/Direct Care Worker I would like to see DIAL have a system to merge different health licensure boards into a single system that would that also include the direct care registry that already exists at

DIAL. Would make things easier for everyone involved to find information needed for DCW, employers and family caregivers to look

and a place for DCW to keep all their credentials updated.

Thank you




Sent from [Mail](#) for Windows



Comments, BCRC <bcrccomments@iowa.gov>

Subcommittee Recommendations

1 message


To: "bcrccomments@iowa.gov" <bcrccomments@iowa.gov>

Thu, Sep 7, 2023 at 11:44 AM

I want to make comments to the recommendations made by the Boards and Commissions Review Committee Subcommission on August 29, 2023.

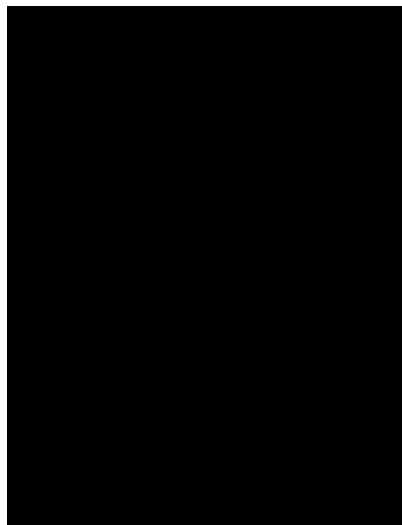
There are several committees that are listed as being eliminated that would have a detrimental effect on the construction industry.

The most concerning is the elimination of the Interior Design Examining Board.

It has been a long fought battle to get licensing for Interior Designers in the State of Iowa.

This is a great benefit as it ensures that there are professionals that are properly trained to provide services that affect the health, safety and welfare of lowans.

I hope that the Boards and Commissions Review Committee will not take this recommendation and insure that Interior Designers remain licensed in the State of Iowa.





Comments, BCRC <bcrccomments@iowa.gov>

Comments - Items 8, 12, 13, 14, 21, 22, 23, 27, 28 and 42

1 message

[REDACTED] >
To: BCRCcomments@iowa.gov

Thu, Sep 7, 2023 at 1:04 PM

Please see the attached memorandum from the Iowa Association of Building Officials regarding proposed items 8, 12, 13, 14, 21, 22, 23, 27, 28 and 42.

If you have any questions, please feel free to contact me,



This communication, along with any attachments, is intended only for the use of the individual or entity to which it is addressed and may contain information that is legally privileged, confidential and exempt from disclosure. If you are not the individual or entity to which this communication is addressed, you are hereby notified that any dissemination, distribution or copying of this message, or any attachment is strictly prohibited. If you have received this message in error, please notify the original sender immediately by return email and delete this message, along with any attachments, from your computer. Thank you.

**IABO Comments - Items 8, 12, 13, 14, 21, 22, 23, 27, 28 and 42.pdf**

52K

MEMORANDUM

September 6, 2023

To: Mr. Jacob Nicholson
Mr. Nate Ristow
Mr. Kraig Paulsen
Mr. Larry Johnson
Mr. David Faith
Ms. Barbara Sloniker
Sen. Jason Schultz
Rep. Jane Bloomingdale
Sen. Janice Weiner
Rep. Adam Zabner

Re: Boards and Commissions Review Committee Proposal Numbers 6, 12, 13, 14, 21, 22, 23, 27, 28 and 42

Members of the Boards and Commissions Review Committee:

The Iowa Association of Building Officials (IABO) provides the following comments to the proposals contained in the following lines of the 11-page spread sheet entitled "Board-Specific Recommendations":

- 8 - Architectural Examining Board
- 12 - Boiler and Pressure Vessel Board
- 13 - State Building Code Advisory Council
- 14 - State Building Code Board of Review
- 21 - Electrical Examining Board
- 22 - Elevator Safety Board
- 23 - Engineering and Land Surveying Examining Board
- 27 - Interior Design Examining Board
- 28 - Landscape Architectural Examining Board
- 42 - Plumbing and Mechanical Systems Board

Absent details, except for single line references on the spreadsheet, IABO cautions that the "reorganize/other changes" and "consolidate/merge" suggested for items 8, 23, 27 and 28 must maintain the highest level of protections for public health, public safety and public welfare, including appropriate examinations, licensing and registrations.

IABO does not object to the elimination of numbered items 12 (Boiler and Pressure Vessel Board) and 22 (Elevator Safety Board.)

In reference to items 13 and 14, IABO would support the recommendation included in item 13 provided item 14 includes a strong State Building Code Board of Review made up of the following members:

- A. A licensed engineer licensed pursuant to Iowa Code*
- B. An architect licensed pursuant to Iowa Code*
- C. A registered residential building contractor*
- D. A registered commercial building contractor*
- E. A local building official employed by a political subdivision with a population less than 15,000 that performs building inspections for that political subdivision*
- F. A local building official employed by a political subdivision with a population greater than 15,000 that performs building inspections for that political subdivision*
- G. A master or journeyman electrician licensed pursuant to Iowa Code*
- H. A master or journeyman plumber licensed pursuant to Iowa Code*
- I. A master or journeyman mechanical contractor licensed pursuant to Iowa Code*
- J. A local fire chief or fire marshal employed by a political subdivision that is responsible for conducting fire inspections for that political subdivision*
- K. A code enforcement officer employed by a political subdivision.*

Finally, IABO cautions that the “consolidate/merge” suggested for items 21 and 42 must maintain the highest level of protections for public health, public safety and public welfare, including appropriate examinations, registration and licensing.

IABO remains ready and willing to assist the members of the Committee in their deliberations and recommendations. Please let us know how we can help.



Comments, BCRC <bcrccomments@iowa.gov>

Oppose consolidation of mental health boards

1 message

Thu, Sep 7, 2023 at 2:17 PM

To: bcrccomments@iowa.gov, [REDACTED]

As an Iowa licensed psychologist, I am registering my **opposition** to lumping oversight of all mental health professionals into the same board.

Consumer trust and safety:

To become a psychologist, I attended a 5 year accredited doctoral training program and then did a 1 year pre-doctoral full time internship (akin to a medical residency) Prior to being eligible for Iowa licensure, I received supervision by a licensed psychologist. Overall, I completed **7 years of training** for my profession.

My graduate program and required pre-doctoral internship were accredited by the American Psychological Association (APA).

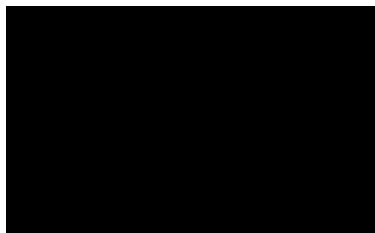
When individuals seek psychological testing or psychotherapy, they are vulnerable. When they schedule with an Iowa licensed psychologist, they can have confidence that the individual completed rigorous, minimum of 5-6 years of training.

Consolidating mental health specialties in one board would dilute psychologists' expertise and professional training. LMHCs and LISWs do not know what psychologists know.

Ethical standards

Licensed social workers and Licensed mental health counselors complete 2 years of graduate courses and their clinical training is supervised by licensed MSWs and LMHCs. Their coursework and clinical training is less than 50% of psychologists. LISWs and LMHCs are not qualified to assess the competence or training of a doctoral level psychologist.

thank you,



Notice: This e-mail (including attachments) is covered by the Electronic Communications Privacy Act, 18 U.S.C. 2510-2521, is confidential and may be legally privileged. If you are not the intended recipient, you are hereby notified that any retention, dissemination, distribution, or copying of this communication is strictly prohibited. Please reply to the sender that you have received the message in error, then delete it. Thank you.



Comments, BCRC <bcrccomments@iowa.gov>

Athletic Trainers

1 message

Thu, Sep 7, 2023 at 5:54 PM

To: bcrccomments@iowa.gov

I wanted to reach out to share that I fully support licensure requirements for athletic trainers. Below supports why I feel this way.

- We currently have 1,129 ATs who are licensed and countless students who rely on licensing.
- That licensure protects the public and lets clients and employers easily know an AT is properly trained, taking continuing education, and monitored.
- The Board helps provide scope of practice guidance and protects the public from untrained persons
- There is no expense associated with the Board of Athletic Training. The fees that ATs pay to renew their license cover all costs. They are cost-effective and are consistently in the black each year.
- Every state and Washington D.C require licensure for ATs, except for Hawaii (which requires registration) and California (who has pending legislation).
- Athletic trainers are healthcare professionals who specialize in the prevention, diagnosis and intervention of emergent, acute and chronic medical conditions involving impairment, functional limitations and disabilities. (you could include your educational requirements here)
- Athletic trainers provide medical services to all types of patients. Across the United States, in addition to practicing in traditional sports team settings, athletic trainers work in performing arts, public safety, occupational health, and with the armed forces. (Here is some statistical data on AT settings: <https://members.nata.org/members1/documents/membstats/index.cfm>. You will need to be logged into the website to access this page. Click on the July 2023 link, and "JobSettingCertified" at the very bottom of the page.)
- Licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.
- Eliminating licensure in IA could potentially impact an AT's ability to practice across state lines (travel with their team), depending on regulatory requirements in other states. (ex. some states allow you to practice in their state temporarily, provided your home state maintains the same regulatory requirements)

Thank you for your time.

Caution: This email is both proprietary and confidential, and not intended for transmission to (or receipt by) any unauthorized person(s). If you believe that you have received this email in error, do not read any attachments. Instead, kindly reply to the sender stating that you have received the message in error. Then destroy it and any attachments. Thank you.



Comments, BCRC <bcrccomments@iowa.gov>

Board of Dietetics

1 message

Thu, Sep 7, 2023 at 8:51 PM

To: BCRCcomments@iowa.gov

I am a registered dietitian nutritionist (RDN) and oppose dissolving the Board of Dietetics.

I listened to the Athletic Trainers comments on 9/6/23. We have many similarities: we have about 1100 licensed practitioners in the state of Iowa. We are qualified with at least a bachelor's degree, we complete >900 hours of supervised practice, and sit for a national exam.

I have worked in a rural hospital for 15 years, and I calculate tube feedings (food already digested that goes directly to the gut), and IV nutrition (food particles already broken down that go directly into the vein of the critically ill). I need a license to practice at my hospital, and at the nursing homes where I practiced prior. A "nutritionist" without these credentials would not be qualified to do this. I also see outpatients who have a diverse set of diagnoses, such as diabetes, GI disorders, and morbid obesity; all of which would not be in a "nutritionists" scope of practice. This is called Medical Nutrition Therapy, and it is recognized by Medicare, Medicaid, and insurance companies as a reimbursable practice.

Below lists the reasons for keeping the Board and Licensure.

Excerpts from Brian Smith, RD, LD (Former Iowa Academy of Nutrition and Dietetics President, and former Iowa State Dietetics Board member):

- Protection of our unique scope of practice, particularly for those who are in the clinical realm in hospitals, care facilities, clinics and with the provision of Medical Nutrition Therapy in the community.
- Protection for the citizens of Iowa when there may have been harm done because of negligence, dereliction of care, impairment by addictions or incompetence. Neither the Academy of Nutrition and Dietetics (AND), nor the Commission on Dietetic Registration (CDR) have this recourse for remediation of harm done by a Registered Dietitian.
- Vetting potential practitioners for competency. The Licensure Board has denied license applications from individuals who were in legal trouble, impaired or not qualified/no longer qualified for the Registered Dietitian credential. Neither AND nor CDR do this.
- The Board has the authority to review and if necessary, sanction Licensed Dietitians who are using their license to engage in practices that are not a part of our scope of practice, for example, recommending and ordering pharmaceuticals that should be ordered by a physician. Neither AND nor CDR have this kind of enforcement power.
- Medicare, Medicaid, and private insurance all have the requirement of a state license to get credentialed to receive reimbursement. This is the same requirement as applied to any health professional that seeks to get paid for their services with insurance dollars.
- If Iowa does not have licensure, then dietitians here in Iowa will not be able to participate in a national compact unless they get licensed in another state where there is licensure, and that state is participating in the compact.
- Licensure has become a **requirement for employment** for Registered Dietitians with all hospitals and care facilities within Iowa. This is the same standard of employment as is applied to nurses, physicians, therapists (including Athletic Trainers) and other allied health professionals.
- The Board of Dietetics is funded by a \$70 fee per year; we have been in the black for a number of years.
- Our Board meets quarterly (as needed), and already has virtual meetings to save on mileage. Our Board is not vacant, and they do meet regularly.

Please keep the Board of Dietetics as is.

The interstate licensure compact for dietitians is in the works; we need to stay licensed. More information to come.

Registered Dietitian Nutritionist, Certified Diabetes Educator



Comments, BCRC <bcrccomments@iowa.gov>

Re: Athletic Trainers

1 message

Thu, Sep 7, 2023 at 6:10 PM

[REDACTED]
To: bcrccomments@iowa.gov

I wanted you to know that I am a hospital CEO and really feel this is important. I didnt include why I was supportive so wanted you to know. Thank you!

On Thu, Sep 7, 2023 at 5:54 PM [REDACTED] <[REDACTED]> wrote:

I wanted to reach out to share that I fully support licensure requirements for athletic trainers. Below supports why I feel this way.

- We currently have 1,129 ATs who are licensed and countless students who rely on licensing.
- That licensure protects the public and lets clients and employers easily know an AT is properly trained, taking continuing education, and monitored.
- The Board helps provide scope of practice guidance and protects the public from untrained persons
- There is no expense associated with the Board of Athletic Training. The fees that ATs pay to renew their license cover all costs. They are cost-effective and are consistently in the black each year.
- Every state and Washington D.C require licensure for ATs, except for Hawaii (which requires registration) and California (who has pending legislation).
- Athletic trainers are healthcare professionals who specialize in the prevention, diagnosis and intervention of emergent, acute and chronic medical conditions involving impairment, functional limitations and disabilities. (you could include your educational requirements here)
- Athletic trainers provide medical services to all types of patients. Across the United States, in addition to practicing in traditional sports team settings, athletic trainers work in performing arts, public safety, occupational health, and with the armed forces. (Here is some statistical data on AT settings: <https://members.nata.org/members1/documents/membstats/index.cfm>. You will need to be logged into the website to access this page. Click on the July 2023 link, and "JobSettingCertified" at the very bottom of the page.)
- Licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for health care professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.
- Eliminating licensure in IA could potentially impact an AT's ability to practice across state lines (travel with their team), depending on regulatory requirements in other states. (ex. some states allow you to practice in their state temporarily, provided your home state maintains the same regulatory requirements)

Thank you for your time.

--

Thank you,
[REDACTED]

Caution: This email is both proprietary and confidential, and not intended for transmission to (or receipt by) any unauthorized person(s). If you believe that you have received this email in error, do not read any attachments. Instead, kindly reply to the sender stating that you have received the message in error. Then destroy it and any attachments. Thank you.



Comments, BCRC <bcrccomments@iowa.gov>

Iowa Board of Massage Therapy

1 message

Thu, Sep 7, 2023 at 6:18 PM

To: bcrccomments@iowa.gov

Dear people,

I've reviewed the proposed cuts and mergers and I'm worried about how our state government represents people like me, my friends, and my family.

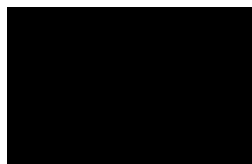
As you look to improve efficiencies, please ensure that boards and panels like the Iowa-Board-of-Massage-Therapy are preserved. Massage therapy is a distinct form of healthcare and needs well-informed leadership.

As important as it is to improve and review government, it is just as important to ensure the needs and priorities of all lowans are taken into account.

Many of these panels improve life for lowans and address critical issues in our state that would otherwise be lost or ignored.

Please work to ensure that this effort does not concentrate power, but ensures all lowans are represented and considered when decisions are made by our state government.

Don't let this be another cynical power grab by Governor Reynolds and her corporate cronies.





Comments, BCRC <bcrccomments@iowa.gov>

Iowa Board of Athletic Training

1 message

Thu, Sep 7, 2023 at 11:10 PM

To: "bcrccomments@iowa.gov" <bcrccomments@iowa.gov>

Dear Sirs and Madams:

I am writing to express my concern and support for maintaining the Iowa Board of Athletic Training. I am a board certified orthopaedic surgeon with subspecialty certification in Sports Medicine. I have been in practice in Des Moines for 31 years now. I have covered every level of sports participation from youth, high school, college, and professional athletes as well as recreational athletes. I first recognized the important role that athletic trainers perform for the safety and protection of their athlete patients at the University of Iowa during my orthopaedic sports medicine fellowship. Throughout my career it has been easy for me to see the professionalism and competence of the very well trained and educated athletic trainers with whom I have the good fortune to work. I would not want to be on a sideline covering a sport without a competent, well trained athletic trainer at my side.

Athletic trainers are the first responders of the sports medicine world. They are analogous to the police, fire, and EMS professionals who also keep us safe and help us during emergencies. Athletic trainers know how to evaluate and manage all levels of sports related emergencies and injuries. From concussions, to heat illness, and broken bones, and torn ligaments. They are also trained to recognize medical problems that may arise in their athlete-patients. They then guide the patient to the medical providers needed to treat their injury or illness. They then participate in the athlete patient's rehabilitation to get them to their most optimal level of health and safety. They need to stay highly trained and up to date with the rapidly changing level of knowledge in health care. It is important that they maintain their level of competence through certification and continuing education. That would best be directed by a professional organization. That organization is the Iowa Board of Athletic Training. I do not want someone with uncertain training to be the first one to evaluate and treat my family members. I assume everyone would agree with me on that point.

Athletic trainers are part of the health care provider network. All health care providers need to prove their professional abilities through state certification and licensure. Doctors, nurses, physician assistants, physical and occupational therapists are required to go through licensure and certification to practice in the state of Iowa. This is for the safety of patients. Maintaining the Iowa Board of Athletic Training will continue to foster an environment of competence and professionalism among athletic trainers for the safety of our loved ones.

I have focused primarily on the traditional role of athletic trainers on the sidelines and training rooms of sports teams. But athletic trainers are now found as first line health care providers in industrial and corporate settings, performing arts, military, and hospitals and medical clinics. No matter their setting athletic trainers are committed to the well being of their patients.

Athletic trainers are important first line health care providers in many different settings. Like any health care professional we need them to be at their best. This comes through rigorous education, training, and lifelong learning. The Iowa Board of Athletic Training will help to maintain their competence through the process of certification and continuing education.

Thank you for your work and attention. I would be happy to further discuss this issue with you.

Sincerely,





Comments, BCRC <bcrccomments@iowa.gov>

To remove midwifery board


1 message

Fri, Sep 8, 2023 at 7:07 AM

To: BCRCcomments@iowa.gov

Hello, I am appalled at how you disrespect the midwives and see nursing as anything close to the profession of a CPM. We have to know as much as the doctor to confirm to our clients that we can reassure and empower them with education! I am a certified professional midwife in Wisconsin! I am overflowing with Iowa clients that do not want a hospital experience! I have had numerous successful births in my Wisconsin birth center due to your laws. Midwives are capable at physiological birth. We have skills in rural medicine we can carry medicines and oxygen and deal with pretty severe hemorrhagic situations. I will say none have been at births but all have been miscarriages that were sent home to deal with and the bleeding took place. I was there and helped them! We are not nurses we have to think like doctors understand all labs, draw labs and take care of clients and also run the birth and great a healthy postpartum. Please give more respect to this matter and see it as a functional need not want in your community! Please help us to help families so they do not birth alone due to trauma or issues at the hospital level.

Thank you for your time.





Comments, BCRC <bcrccomments@iowa.gov>

BCRC - Recommendations - Voting Citizen Response

1 message

Fri, Sep 8, 2023 at 7:53 AM

To: "BCRCcomments@iowa.gov" <BCRCcomments@iowa.gov>

Dear Boards and Commissions Review Committee,

My name is [REDACTED], and I am a Registered Interior Designer living and working in Iowa. I hope it makes sense to reach out in response to the Boards & Commissions Review Committee's August 29 recommendation to eliminate the Interior Design Examining Board. I was unable to be present at the meeting this Wednesday, however, I would like to share my relevant points below.

Registered interior design professionals directly impact public health, safety, and welfare, and now that Registered Interior Designers can practice independently in Iowa, an oversight board led by practitioners and subject matter experts will be more important than ever. I strongly urge the Committee to consider keeping some form of a regulatory board overseeing Registered Interior Designers.

During the 2023 legislative session, the Iowa Legislature passed SF 135, with overwhelming bipartisan support, which expanded the state's interior designer registration to include the ability to stamp and seal nonstructural construction plans for permitting. Registered interior designers can now practice independently with that title. With that capability, the potential for risk to public safety exists with it.

Even if there was little discipline necessary for RIDs before SF 135 become law, enforcement and disciplinary capacity of RIDs will be critical moving forward. Those matters are best left to subject matter experts and practitioners in the profession, as is the case study used in many other states.

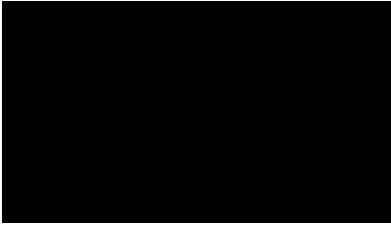
If maintaining the Interior Design Examining Board is not an option, perhaps it can be merged with the Architectural Examining Board. Joint boards are utilized in 15 states within the United States currently, and due to the overlap in practice between architects and registered interior designers, such a board would be uniquely qualified to enforce the law and discipline those that cause harm or break it.

I hope it makes sense to keep a subject matter expert-led regulatory board intact for the interior design profession.

Please contact me if you have any questions.

Kind Regards,

[REDACTED]



INVISION Enriching lives through architecture



Comments, BCRC <bcrccomments@iowa.gov>

Iowa's board and commissions.

1 message

Fri, Sep 8, 2023 at 1:08 PM

To: "BCRCcomments@iowa.gov" <BCRCcomments@iowa.gov>

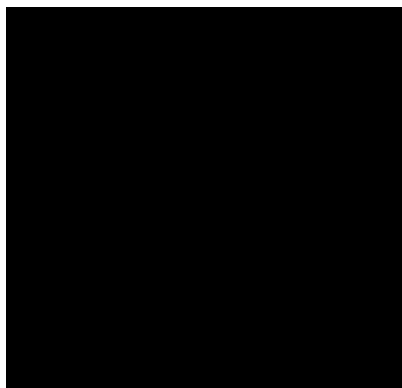
Hello,

I am writing to reflect on concerns I have as a physical therapist assistant who provides care for those needing physical therapy. In addition, I serve as the program director and full-time faculty member of a physical therapist assistant program at Kirkwood Community College in Cedar Rapids.

One thing I would like to carefully consider is how decisions for consolidation of boards will be made. It remains unclear whether boards recommended for consolidation will be merged or consolidated based on a decision by the boards and commissions review committee alone. I think at most a call for public feedback should occur once we know which boards are being consolidated with each other. However, I also recommend that we have an opportunity to provide feedback on this decision before a final decision on consolidation is made. Some boards would make sense to consolidate with each other but others might not. I think practitioners in the state in the varied disciplines are best suited to provide guidance on this, and again it remains unclear whether this will occur.

For example, should physical and occupational therapy be merged with chiropractic, massage, or respiratory care? Most of the board meetings are full of complaints or concerns against practitioners. If we merge these boards too heavily do we need to worry about complaints falling through and by that not ensuring consumer protection which is the main job of all of our licensure boards?

Thank you for the opportunity to provide feedback,



"Pelople will forget what you said, people will forget what you did, but people will never forget how you made them feel"

~Maya Andelou

9/8/23, 1:11 PM

State of Iowa Mail - Iowa's board and commissions.

Privileged/Confidential Information may be contained in this message. If you are not the addressee indicated in this message (or responsible for delivery of the message to such person), you may not copy or deliver this message to anyone. In such case, you should destroy this message and kindly notify the sender by reply email. Please advise immediately if you or your employer do not consent to Internet email for messages of this kind. Opinions, conclusions and other information in this message that do not relate to the official business of my organization shall be understood as neither given nor endorsed by it.



Boal, Michael <michael.boal2@iowa.gov>

BCRC Comment/Questions received from the public through the DOM website

1 message

idom.info@iowa.gov <idom.info@iowa.gov>
To: Michael Boal <michael.boal2@iowa.gov>

Fri, Sep 8, 2023 at 1:33 PM

This came in through the Department of Management's 'Contact Us' portion of the website.

Thanks,
Tammy

----- Forwarded message -----

From: **Iowa Department of Management** <tammy.winters@iowa.gov>
Date: Fri, Sep 8, 2023 at 1:02 PM
Subject: Webform submission from: Contact Us
To: <idom.info@iowa.gov>

Submitted on Fri, 09/08/2023 - 01:02 PM

Submitted by: Anonymous

Submitted values are:

Name

██████████

Email

████████████████████

Phone

██████████████

Message

I was just informed of the recommendation to eliminate, consolidate, or merge boards and licensing agencies. I was shocked to see Athletic Trainers listed on this list to eliminate. As an Occupational Health RN turned Nurse Practitioner, I am stunned as to why anyone would feel these professionals do not need to be licensed, while Massage Therapists would continue, for example. Clearly there is a lack of understanding for what Athletic Trainers (which requires a masters degree) do in the occupational health world, such as at large manufacturing plants like Deere, to treat and prevent serious injuries. Medical guidelines and insurance companies are now requiring PT which resolves injuries without surgery in the majority of cases. Putting PT and AT under one umbrella seems to make sense, but eliminating AT does not. I would like to know how the decision was made that certain groups should be eliminated, or merged, and on what basis? What facts are behind the claims of "ineffective and inefficient?" I do not doubt there is a lot of redundancy and waste, and room for improvement, but where is the basis for these recommendations?



Comments, BCRC <bcrccomments@iowa.gov>

Respiratory therapy board merge

1 message

Fri, Sep 8, 2023 at 10:14 PM

[REDACTED]
To: bcrccomments@iowa.gov

Governor Reynolds or to Whom It May Concern,

My name is [REDACTED] and I am a Respiratory Therapist in rural Iowa. I am not nearly as eloquent as Whitney Clausen, the current IaSRC president, but I do share her sentiments. I will share her quote below:

"I am voicing concern about the merging of the Respiratory Therapy and Polysomnography licensure board. Respiratory therapists care for individuals that have trouble breathing such as traumas, premature birth, critical illnesses, COPD and asthma to name a few. We have been vital in the care and treatment of individuals with COVID-19 and RSV. We work under the direction of physicians. For the safety of patients, it is important that we are joined with healthcare professionals that serve like patients.

When the merge occurs, we need a voice on the merged board to continue to assess competency for those practicing respiratory therapy and provide safe and effective respiratory care. We currently have 4 seats on our board and we need to maintain these voice in a similar ratio. Given the possible list of medical boards, it seems fitting that we would fall under the board of medicine. Physicians are familiar with respiratory care and we work in similar environments.

If consolidation/merge is what is needed, I strongly urge you to maintain the voice of Respiratory Therapy on a newly merged board, suggesting the board of medicine."

I appreciate the ability to express my concerns to you and encourage you to, please, consider them.

Thank you for your time,
[REDACTED]

Powered by Cricket Wireless



Comments, BCRC <bcrccomments@iowa.gov>

Respiratory Therapy and Polysomnography licensure board merging

1 message

[Redacted]

Sat, Sep 9, 2023 at 10:28 AM

To: "bcrccomments@iowa.gov" <bcrccomments@iowa.gov>

To whom it may concern,

My name is [Redacted]. I am a Respiratory Therapy student at the Kirkwood Community College in Cedar Rapids, Iowa. I am voicing concern about the merging of the Respiratory Therapy and Polysomnography licensure board. Respiratory therapists care for individuals that have trouble breathing such as traumas, premature birth, critical illnesses, COPD and asthma to name a few. We have been vital in the care and treatment of individuals with COVID-19 and RSV. We work under the direction of physicians. For the safety of patients, it is important that we are joined with healthcare professionals that serve like patients.

When the merge occurs, we need a voice on the merged board to continue to assess competency for those practicing respiratory therapy and provide safe and effective respiratory care. We currently have 4 seats on our board and we need to maintain these voice in a similar ratio. Given the possible list of medical boards, it seems fitting that we would fall under the board of medicine. Physicians are familiar with respiratory care and we work in similar environments.

If consolidation/merge is what is needed, I strongly urge you to maintain the voice of Respiratory Therapy on a newly merged board, suggesting the board of medicine.

Thank you for your consideration,

Best wishes,

[Redacted]



[Redacted]



Comments, BCRC <bcrccomments@iowa.gov>

Please allow Board of Massage Therapy to Continue As Is

1 message

[REDACTED]
To: BCRCcomments@iowa.gov

Sun, Sep 10, 2023 at 8:28 AM

BCRC members,

Please allow the Board of Massage Therapy to Continue As Is. Massage therapists are the experts in their field; I would like them to maintain their ability to focus on detecting fraud in their profession. Forcing them to consolidate with another health committee that has a different area of expertise would dilute the expertise of the massage therapists and waste their time sitting in meetings that deal with issues not directly relevant to their profession; this would be an ineffective use of commissions. The person who spoke at the hearing noted that they found eight fraudulent massage therapists at their most recent meeting. As someone who enjoys getting a massage, I take comfort in knowing that there is a board whose focus is reducing fraud in this profession.

[REDACTED]



Comments, BCRC <bcrccomments@iowa.gov>

Please allow the Landscape Architectural Examining Board to Continue As Is

1 message

[Redacted]

Sun, Sep 10, 2023 at 8:33 AM

To: BCRCcomments@iowa.gov

BCRC members,

Please allow the Landscape Architectural Examining Board to continue as is. Landscape architecture is a highly specialized profession; these experts deserve the freedom and autonomy to regulate their own profession. What board or commission did you anticipate that the landscape architects consolidate with? Looking at the list, there is no other board that is remotely related to landscape architecture. Could you explain how you arrived at this recommendation?

[Redacted]



Comments, BCRC <bcrccomments@iowa.gov>

Respiratory Therapy Licensure

1 message

[Redacted]

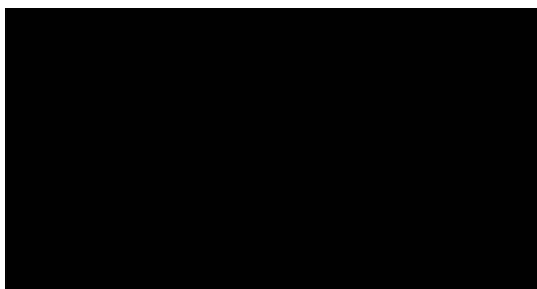
Sun, Sep 10, 2023 at 7:15 PM

To: bcrccomments@iowa.gov

My name is [Redacted]. I am the Iowa Society for Respiratory Care Secretary and Program Director/faculty at Hawkeye Community College. I represent the respiratory therapy profession in the state of Iowa. I am voicing concern about the merging of the Respiratory Therapy and Polysomnography licensure board. Respiratory therapists care for individuals that have trouble breathing such as traumas, premature birth, critical illnesses, COPD and asthma to name a few. We have been vital in the care and treatment of individuals with COVID-19 and RSV. We work under the direction of physicians. For the safety of patients, it is important that we join healthcare professionals that serve like patients.

When the merger occurs, we need a voice on the merged board to continue to assess competency for those practicing respiratory therapy and provide safe and effective respiratory care. We currently have 4 seats on the board, and we need to maintain these voices in a similar ratio. Given the possible list of medical boards, it seems fitting that we would fall under the board of medicine. Physicians are familiar with respiratory care, and we work in similar environments.

If consolidation/merge is what is needed, I strongly urge you to maintain the voice of Respiratory Therapy on a newly merged board, suggesting the board of medicine.





Comments, BCRC <bcrccomments@iowa.gov>

Comments to the Board and Commission Review Committee

1 message

Sun, Sep 10, 2023 at 7:23 PM

To: "BCRCcomments@iowa.gov" <BCRCcomments@iowa.gov>

September 10, 2023

Dear Board and Commission Review Committee chair and members,

Thank you for this opportunity to comment on your important mission of efficiency in government and the role of the Iowa Physician Assistant (PA) Regulatory Board in ensuring medical care is available where it is needed. After all no care is not safe care – nor is it efficient. Today, we have had medical care in Redfield (pop. 835) since 1988 because of reasonable and efficient regulation by the PA board that began then.

Right now, too many Iowa small towns are in crisis, losing their access to medical care. These communities' only medical clinics are closing. Buffalo Center (pop. 905) and Allison (pop. 1025) had their only clinics closed earlier this year. Gladbrook (pop. 945) is scheduled to close in September 2023. The PA board is uniquely designed to meet one of our areas of greatest need, providing care in our small towns. Two of the five PA members and one of the 2 physician members must be from counties with populations less than 50,000.

Fortunately, the greater administrative efficiency and regulatory flexibility of the new 2023 PA law, HF 424, gives Iowa's small towns another crucial option of utilizing PAs to keep medical care in their communities. Furthermore, these towns know that businesses and the jobs they provide are much less likely to locate in their communities if no medical care is available in the town. And regulation of PAs by others unfamiliar with PA medical skills is not likely to result in policies that are efficient and effective in getting quality medical care where it is needed.

While protecting the public, the Physician Assistant Board has achieved much efficiency in PA licensing. These efficiencies have resulted in medical care being available in rural and under-served areas where care would be unavailable if it were not for the PA and efficient regulation by the PA Board. Some of these efficiencies include increasing access to care by reducing the average PA licensing processing time from 2-3 months to two weeks and making remote site regulations more workable thereby allowing more PAs to serve in small towns, often as the only source of medical care. Additionally, the PA Board has increased access to care by permitting tele-health patient visits as well as by allowing consultations with specialists virtually. And now 40% of Iowa's 1300 PAs provide care in rural areas. Crucially, in many of our small Iowa towns a PA is the community's sole source of medical care.

With the ever increasing complexity of medicine and the medical needs of Iowans it is clear that PAs need to be regulated by those knowledgeable of the profession just as does nursing, pharmacy and physicians. Given the PA Board's record efficiency and the dire need of our small towns the PA Board needs to remain intact to carry out the mission the legislature and governor just gave it earlier this year of getting care where it is needed.

Please let us know if further information is needed. Thank you for your attention to this information.

Sincerely,





Comments, BCRC <bcrccomments@iowa.gov>

RRT License Consolidation

1 message

Sun, Sep 10, 2023 at 8:40 PM

To: "bcrccomments@iowa.gov" <bcrccomments@iowa.gov>

I am a licensed Respiratory Therapist. I am one of the few in the medical field that is conservative and support Gov Reynold's in her endeavors. I trust her to do what is right for our state, however this licensing consolidation is something I cannot get behind. Respiratory Therapy has nothing to do with Chiropractic and Physical Therapists. We are critical care specialists, intubating and placing the most vulnerable patients on and running life saving devices such as ventilators; from premature babies, to pediatrics, to teenagers, to adults, to geriatric patients. We are the silent force that saves so many people in all walks of life. No one knows who we are until they need us, then we are never forgotten to our grateful patients, nurses and Doctors. To put our board with other boards that have no experience in critical care situations will be detrimental to the growth of my field. I am not disregarding that Physical Therapist and Chiropractors have an important role, however it is not the role of a critical care specialist. I hope that you can understand that these fields do not belong together and Respiratory Therapy needs to remain its own entity for the sake of saving precious lives. We need to be backed and supported.

Thank you for listening

Sent from my iPhone



Comments, BCRC <bcrccomments@iowa.gov>

Respiratory Therapy License

1 message

[Redacted]

Mon, Sep 11, 2023 at 7:07 AM

To: "bcrccomments@iowa.gov" <bcrccomments@iowa.gov>

This message was sent securely using Zix®

My name is [Redacted] I am a Registered Respiratory Therapist, and I am voicing concern about the merging of the Respiratory Therapy and Polysomnography licensure board. Respiratory therapists care for individuals that have trouble breathing such as traumas, premature birth, critical illnesses, COPD and asthma to name a few. We have been vital in the care and treatment of individuals with COVID-19 and RSV. We work under the direction of physicians. For the safety of patients, it is important that we join healthcare professionals that serve like patients.

When the merger occurs, we need a voice on the merged board to continue to assess competency for those practicing respiratory therapy and provide safe and effective respiratory care. We currently have 4 seats on the board, and we need to maintain these voices in a similar ratio. Given the possible list of medical boards, it seems fitting that we would fall under the board of medicine. Physicians are familiar with respiratory care, and we work in similar environments.

If consolidation/merge is what is needed, I strongly urge you to maintain the voice of Respiratory Therapy on a newly merged board, suggesting the board of medicine.

[Redacted]

This message was secured by Zix®.



Comments, BCRC <bcrccomments@iowa.gov>

Respiratory Therapy in state of Iowa

1 message

Mon, Sep 11, 2023 at 9:48 AM

To: "bcrccomments@iowa.gov" <bcrccomments@iowa.gov>

"My name is [REDACTED] I am a member of the Iowa Respiratory Therapy Association and I represent the respiratory therapy profession in the state of Iowa. I am voicing concern about the merging of the Respiratory Therapy and Polysomnography licensure board. Respiratory therapists care for individuals that have trouble breathing such as traumas, premature birth, critical illnesses, COPD and asthma to name a few. We have played a vital role in the care and treatment of individuals with COVID-19 and RSV. We work under the direction of physicians. For the safety of patients, it is important that we join a healthcare professionals that serve our patients.

When the merger occurs, we need a voice on the merged board to continue to assess competency for those practicing respiratory therapy, and provide safe and effective respiratory care. We currently have 4 seats on the board, and we need to maintain these voices. Given the possible list of medical boards, it seems fitting that we would fall under the board of medicine. Physicians are familiar with respiratory care, and we work in similar environments.

If consolidation/merge is what is needed, I strongly urge you to maintain the voice of Respiratory Therapy on a newly merged board, suggesting the board of medicine.

Please view the attached documentation on the need of Respiratory Therapist worldwide. The state of Iowa is experiencing the demand for the profession as many of our fellow therapist are reaching retirement age or many have left the profession after COVID. We need to keep the profession part of a medical board.

Thank you for your time. Please keep Respiratory Therapy and Polysomnography board part of a medical licensing board.



"Laughter is timeless. Imagination has no age. And dreams are forever." - Walt Disney



--- Notice: This E-mail (including attachments), covered by the Electronic Communications Privacy Act, 19 USC 2510-2521, is confidential and may be legally privileged. If you are not the intended recipient, you are hereby notified that any retention, dissemination, distribution, or copying of this communication is strictly prohibited. Please reply to the sender that you have received this message in error, and then delete it. This information is intended only for the use of the individual or entity named above. The authorized recipient of this information is prohibited from disclosing this information to any other party unless required to do so by law or regulation to destroy the information after its stated need has been fulfilled.



NBRC - Why World needs RT.pdf

293K



Comments, BCRC <bcrccomments@iowa.gov>

Respiratory Care

1 message

Mon, Sep 11, 2023 at 9:55 AM

To: "bcrccomments@iowa.gov" <bcrccomments@iowa.gov>

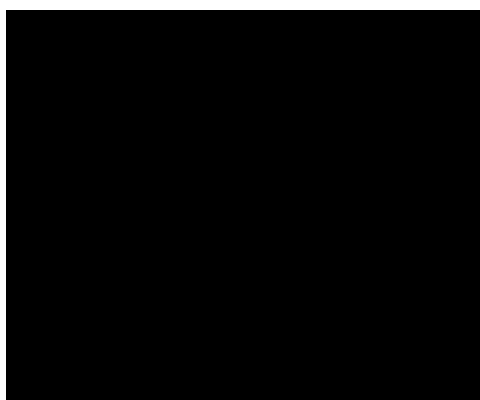
"My name is [REDACTED] I have been a Respiratory Therapist for 26 years. I am voicing concern about the merging of the Respiratory Therapy and Polysomnography licensure board. Respiratory therapists care for individuals that have trouble breathing such as traumas, premature birth, critical illnesses, COPD and asthma to name a few. We have been vital in the care and treatment of individuals with COVID-19 and RSV. We work under the direction of physicians. For the safety of patients, it is important that we join healthcare professionals that serve like patients. I work in a rural critical care hospital and we see so many different things and we are the go-to people for everything critical.

When the merger occurs, we need a voice on the merged board to continue to assess competency for those practicing respiratory therapy and provide safe and effective respiratory care. We currently have 4 seats on the board, and we need to maintain these voices in a similar ratio. Given the possible list of medical boards, it seems fitting that we

would fall under the board of medicine. Physicians are familiar with respiratory care, and we work in similar environments.

If consolidation/merge is what is needed, I strongly urge you to maintain the voice of Respiratory Therapy on a newly merged board, suggesting the board of medicine."

Thank you for listening.



Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain privileged and confidential information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended

9/11/23, 12:28 PM

State of Iowa Mail - Respiratory Care

recipient, please contact the sender by reply e-mail and destroy all copies of the original message.



Comments, BCRC <bcrccomments@iowa.gov>

Resp. licensure

1 message

Mon, Sep 11, 2023 at 10:21 AM

To: "bcrccomments@iowa.gov" <bcrccomments@iowa.gov>

Hello,

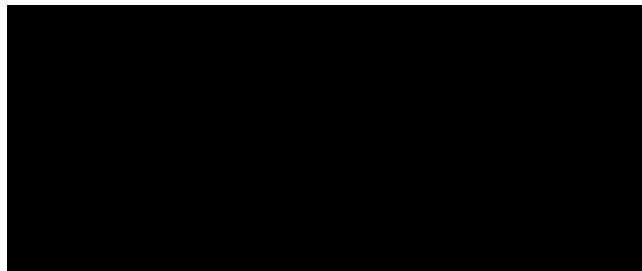
My name is [REDACTED] I am the Iowa Society for Respiratory Care District I board representative and I represent the respiratory therapy profession in the state of Iowa. I am voicing concern about the merging of the Respiratory Therapy and Polysomnography licensure board. Respiratory therapists care for individuals that have trouble breathing such as traumas, premature birth, critical illnesses, COPD and asthma to name a few. We have been vital in the care and treatment of individuals with COVID-19 and RSV. We work under the direction of physicians. For the safety of patients, it is important that we join healthcare professionals that serve like patients.

When the merger occurs, we need a voice on the merged board to continue to assess competency for those practicing respiratory therapy and provide safe and effective respiratory care. We currently have 4 seats on the board, and we need to maintain these voices in a similar ratio. Given the possible list of medical boards, it seems fitting that we would fall under the board of medicine. Physicians are familiar with respiratory care, and we work in similar environments.

If consolidation/merge is what is needed, I strongly urge you to maintain the voice of Respiratory Therapy on a newly merged board, suggesting the board of medicine. It is important to know behind those critical breaths is a trained Respiratory Care Practitioner.

Thank you for your diligence in this matter.

[REDACTED]



This message and accompanying documents are covered by the Electronic Communications Privacy Act, 18 U.S.C. sections 2510-2521, and contain information intended for the specified individual(s) only. This information is confidential. If you are not the intended recipient or an agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error and that any review, dissemination, copying, or the taking of any action based on the contents of this information is strictly prohibited. If you have received this communication in error, please notify us immediately by e-mail, and delete the original message.



Comments, BCRC <bcrccomments@iowa.gov>

Respiratory Care

1 message

Mon, Sep 11, 2023 at 10:53 AM

To: bcrccomments@iowa.gov

"My name is [REDACTED] I am a Respiratory Therapist with 24 years of pride & experience. I am voicing concern about the merging of the Respiratory Therapy and Polysomnography licensure board. Respiratory therapists care for individuals that have trouble breathing such as traumas, premature birth, critical illnesses, COPD and asthma to name a few. We also transport critical pediatric and neonatal patients & work directly with Pulmonologists for patients needing diagnostic Bronchoscopy to stage and assess lung cancer & diagnose infection. We have been vital in the care and treatment of individuals with COVID-19 and RSV. We work under the direction of physicians. For the safety of patients, it is important that we join healthcare professionals that serve like patients.

When the merger occurs, we need a voice on the merged board to continue to assess competency for those practicing respiratory therapy and provide safe and effective respiratory care. We currently have 4 seats on the board, and we need to maintain these voices in a similar ratio. Given the possible list of medical boards, it seems fitting that we would fall under the board of medicine. Physicians are familiar with respiratory care, and we work in similar environments.

If consolidation/merge is what is needed, I strongly urge you to maintain the voice of Respiratory Therapy on a newly merged board, suggesting the board of medicine."

Sincerely,

[REDACTED]



Comments, BCRC <bcrccomments@iowa.gov>

Licensure of Iowa Respiratory Therapists

1 message

Mon, Sep 11, 2023 at 11:56 AM

To: "bcrccomments@iowa.gov" <bcrccomments@iowa.gov>

As an Iowa Registered Respiratory Therapist for nearly 40 years, I stand with ISRC President, Whitney Clausen, RRT, BSRT, MS -- Respiratory Care needs to continue to have a voice in the future.

"My name is [REDACTED] I am the Iowa Society for Respiratory Care President and I represent the respiratory therapy profession in the state of Iowa. I am voicing concern about the merging of the Respiratory Therapy and Polysomnography licensure board. Respiratory therapists care for individuals that have trouble breathing such as traumas, premature birth, critical illnesses, COPD and asthma to name a few. We have been vital in the care and treatment of individuals with COVID-19 and RSV. We work under the direction of physicians. For the safety of patients, it is important that we join healthcare professionals that serve like patients.

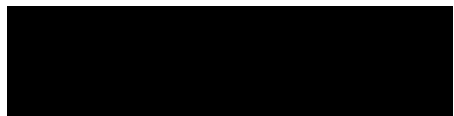
When the merger occurs, we need a voice on the merged board to continue to assess competency for those practicing respiratory therapy and provide safe and effective respiratory care. We currently have 4 seats on the board, and we need to maintain these voices in a similar ratio. Given the possible list of medical boards, it seems fitting that we

would fall under the board of medicine. Physicians are familiar with respiratory care, and we work in similar environments.

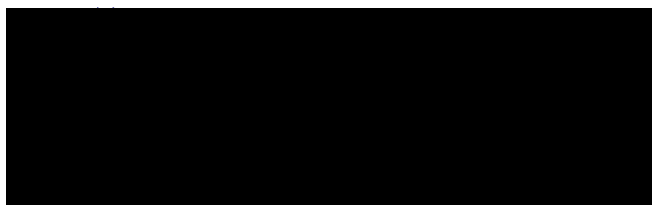
If consolidation/merge is what is needed, I strongly urge you to maintain the voice of Respiratory Therapy on a newly merged board, suggesting the board of medicine."

Speak loud by emailing bcrccomments@iowa.gov , your voice is powerful.

Thank you.



Thank You ,





This message and accompanying documents are covered by the Electronic Communications Privacy Act, 18 U.S.C. sections 2510-2521, and contain information intended for the specified individual(s) only. This information is confidential. If you are not the intended recipient or an agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error and that any review, dissemination, copying, or the taking of any action based on the contents of this information is strictly prohibited. If you have received this communication in error, please notify us immediately by e-mail, and delete the original message.



Comments, BCRC <bcrccomments@iowa.gov>

Respiratory Care Board and Licensure

1 message

Mon, Sep 11, 2023 at 1:49 PM

To: "bcrccomments@iowa.gov" <bcrccomments@iowa.gov>

"My name is [REDACTED] I am a Respiratory Therapist in the state of Iowa. I am voicing concern about the merging of the Respiratory Therapy and Polysomnography licensure board. Respiratory therapists care for individuals that have trouble breathing such as traumas, premature birth, critical illnesses, COPD and asthma to name a few. We have been vital in the care and treatment of individuals with COVID-19 and RSV. We work under the direction of physicians. For the safety of patients, it is important that we join healthcare professionals that serve like patients.

When the merger occurs, we need a voice on the merged board to continue to assess competency for those practicing respiratory therapy and provide safe and effective respiratory care. We currently have 4 seats on the board, and we need to maintain these voices in a similar ratio. Given the possible list of medical boards, it seems fitting that we would fall under the board of medicine. Physicians are familiar with respiratory care, and we work in similar environments.

If consolidation/merge is what is needed, I strongly urge you to maintain the voice of Respiratory Therapy on a newly merged board, suggesting the board of medicine."

Thank you,

[REDACTED]

Confidentiality Notice:

This e-mail, including any attachments is the property of Trinity Health and is intended for the sole use of the intended recipient(s). It may contain information that is privileged and confidential. Any unauthorized review, use, disclosure, or distribution is prohibited. If you are not the intended recipient, please delete this message, and reply to the sender regarding the error in a separate email.



Comments, BCRC <bcrccomments@iowa.gov>

Respiratory Therapist License

1 message

Mon, Sep 11, 2023 at 2:19 PM

To: "bcrccomments@iowa.gov" <bcrccomments@iowa.gov>

Good Afternoon,

I am speaking on behalf of all Respiratory Therapist when I say we need to keep Respiratory Therapy as a license practice. It hard for me to sit here and even think that our legislature would even consider this being so close to COVID and the role that Respiratory Therapist played in the Pandemic. We are individuals who specialized in cardiopulmonary diseases and respond to all different types of situations and need the proper education and training to be able to perform in these critical situations.

Thank you,

This E-mail (including the attachments) is covered by the Electronic Communications Privacy Act, 18 U.S.C. §§ 2510-2521, is confidential and may be legally privileged. If you are not the intended recipient, you are hereby notified that any retention, dissemination, distribution, or copying of this communication is strictly prohibited. Please reply to the sender that you have received the message in error, and then delete it.



Comments, BCRC <bcrccomments@iowa.gov>

Respiratory Therapist licensure

1 message

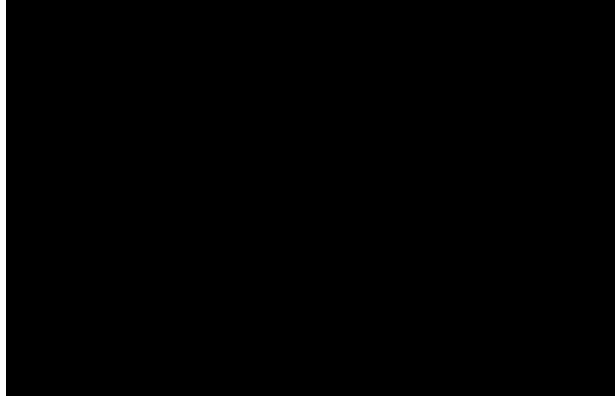
Mon, Sep 11, 2023 at 2:28 PM

To: "bcrccomments@iowa.gov" <bcrccomments@iowa.gov>

To Whom it May Concern:

I am very concerned that there is a possibility that the state of Iowa may no longer require their Respiratory Therapists to be licensed. Why would we go backwards in healthcare instead of forward? Do we want our family and community members being taken care of in their time of illness by someone who isn't required to prove they have the proper knowledge and skill of a licensed Respiratory Therapist. I think anyone who has had a loved one on a ventilator would say no.

Sincerely,



—Boone County Hospital is a CMS 5-Star Hospital—

—Boone County Hospital is a CMS 5-Star Hospital—

Electronic Mail Confidentiality Notice: This electronic mail message and all attachments may contain confidential information belonging to the sender or the intended recipient. This information is intended ONLY for the use of the individual or entity named above. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution (electronic or otherwise), forwarding or taking any action in reliance on the contents of this information is strictly prohibited. If you have received this electronic transmission in error, please immediately notify the sender by telephone or email to arrange for the return of the electronic mail, attachments, or documents. Boone County Hospital, Telephone 515.433.8855, [1015 Union, Boone IA 50036](#)



Comments, BCRC <bcrccomments@iowa.gov>

Iowa Licensure Merging

1 message

Mon, Sep 11, 2023 at 8:56 PM

To: "bcrccomments@iowa.gov" <bcrccomments@iowa.gov>

State of Iowa,

I am writing today to voice my concerns regarding Respiratory Therapy Licensure merging. We need to recognize the value of the respiratory professional and encourage continued licensure with like health professions.

It is necessary to understand what would happen without state scope of practice regulations that help RTs improve practice and expand service. This group of professionals need the States support to keep high standards and competence regulated throughout the state for RTs. If anyone could do our jobs - we would have been replaced years ago- but still we remain productive members of the healthcare team.

RTs have a special set of assessment skills that was highlighted during the Pandemic and allows them to work hand in hand with Physicians, Registered Nurses, and other health professionals caring for patients with breathing issues. They have a wide range of knowledge that can surpass the physician in specialized knowledge about the respiratory system. Physicians understand this and rely on us. We work under direction of physicians and are part of multi-disciplinary teams that care for patients. We wear many hats in the healthcare profession and serve many areas throughout the hospital. Inpatient, outpatient, long-term care, and homecare. We are one of the only departments in a hospital that gets to see the patient at their worst and follows them through the length of their stay and can even provide education and homecare services that follow them there.

Please think about the risks for healthcare in Iowa if Licensure for RTs does not help them practice with quality at high standards.

Think also about the benefits that will surely continue for RTs across the state if Licensure is an expected standard instead of just a way for the state to make money.

Sincerely,

Sent from my U.S.Cellular© Smartphone
Get [Outlook for Android](#)

Confidentiality Notice:

This e-mail, including any attachments is the property of Trinity Health and is intended for the sole use of the intended recipient(s). It may contain information that is privileged and confidential. Any unauthorized review, use, disclosure, or distribution is prohibited. If you are not the intended recipient, please delete this message, and reply to the sender regarding the error in a separate email.



Comments, BCRC <bcrccomments@iowa.gov>

Respiratory Therapist Board

1 message

Tue, Sep 12, 2023 at 9:15 AM

To: "bcrccomments@iowa.gov" <bcrccomments@iowa.gov>

Good afternoon,

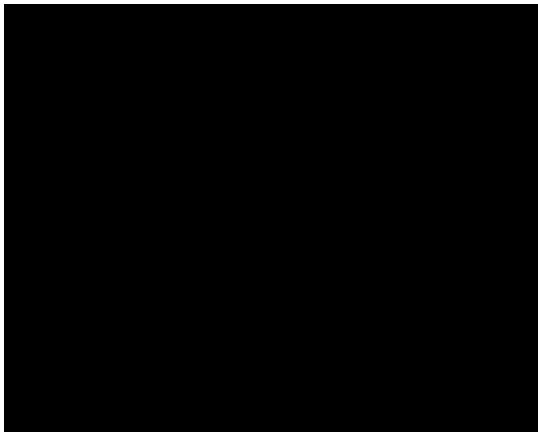
My name is [REDACTED] I am a practicing registered respiratory therapist in the state of Iowa. I am voicing concern about the merging of the Respiratory Therapy and Polysomnography licensure board. Respiratory therapists care for individuals that have trouble breathing such as traumas, premature birth, critical illnesses, COPD and asthma to name a few. We have been vital in the care and treatment of individuals with COVID-19 and RSV. We work under the direction of physicians. For the safety of patients, it is important that we join healthcare professionals that serve like patients.

When the merger occurs, we need a voice on the merged board to continue to assess competency for those practicing respiratory therapy and provide safe and effective respiratory care. We currently have 4 seats on the board, and we need to maintain these voices in a similar ratio. Given the possible list of medical boards, it seems fitting that we

would fall under the board of medicine. Physicians are familiar with respiratory care, and we work in similar environments.

If consolidation/merge is what is needed, I strongly urge you to maintain the voice of Respiratory Therapy on a newly merged board, suggesting the board of medicine."

Blessings,



Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain privileged and confidential information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message.



Comments, BCRC <bcrccomments@iowa.gov>

Fwd: RELEASE: Gov. Reynolds calls for public input on boards and commissions, Review Committee to hold public meeting

1 message

Tue, Sep 12, 2023 at 9:16 AM

To: BCRCcomments@iowa.gov

Cc: [REDACTED]

Hello,

Can this comment please be registered for NASW-IA? Please confirm this has been received.

Thank you,
[REDACTED]

"The Iowa Chapter of the National Association of Social Workers (NASW-IA) works to advance our members' professional development and to promote the social work profession. NASW-IA is opposed to the consolidation/merging of the Board of Social Work.

The Board of Social Work oversees the largest amount of licensees available to provide clinical mental health services in the State of Iowa, more than the Licensed Marriage and Family Therapists and Licensed Mental Health Counselors combined.

Unlike the Iowa Board of Medicine (19 staff members for 8710 licensees), the Iowa Board of Nursing (22 staff members for 60,567 licensees) or the Iowa Board of Dentistry (8 staff members for approximately 2250 licensees), the staff of the Bureau of Professional Licensure at the Department of Inspections, Appeals and Licensure (which includes the Iowa Board of Social Work) serve multiple boards.

The Bureau of Professional Licensure serves 60,909 active licensees with 16.5 staff members. Certainly, there are other personnel from the Division of Inspections and Appeals that support the Professional Boards, but the Bureau of Professional Licensure itself is quite lean.

Additionally, combining boards would make for longer meetings. Combining the boards will not decrease the workload that each profession brings before the Bureau. If for example the Board of Social Work and the Board of Behavioral Science were to be combined, there would still be the same number of complaints to be addressed for each profession. The Iowa Board of Social Work meetings are generally a full business day. The Iowa Board of Behavioral Health meetings are generally the same length. This scenario could actually lead to inefficiencies, as the board meetings might need to be extended to two days long, increasing per diems and leading to the need for hotel stays.

To acquire a social work license, there are different educational requirements, fieldwork, clinical exams and amounts of exams, and a different Code of Ethics at a national level compared to other mental health providers.

Significantly altering the Board of Social Work and the ability to follow the standards can adversely affect Iowa's ability to join the Interstate Compact. The interstate compact will offer more access to mental health services for rural Iowans through telehealth opportunities, provide access to specialized therapists across state borders, it will support relocating spouses and families of veterans, and improve continuity of care for clients.

Further complicating and minimizing the work of the Iowa Board of Social Work will affect the ability to more efficiently license social workers who serve the mental health needs of Iowans which will then further affect the abilities of Iowans to live meaningful lives and contribute to the local economy.

We ask that the Iowa Board of Social Work be removed from the list of recommendations for consolidation."

----- Forwarded message -----

From: **Press Releases from Iowa Governor's Office** <IowaGovernorsOffice@public.govdelivery.com>

Date: Tue, Aug 29, 2023 at 2:26 PM

Subject: RELEASE: Gov. Reynolds calls for public input on boards and commissions, Review Committee to hold public

meeting

To: <[REDACTED]>

OFFICE OF THE GOVERNOR

Governor Kim Reynolds ★ Lt. Governor Adam Gregg

FOR IMMEDIATE RELEASE: Tuesday, August 29, 2023

CONTACT: Kollin Crompton, (515) 745-2840, kollin.crompton@governor.iowa.gov

Gov. Reynolds calls for public input on boards and commissions, Review Committee to hold public meeting

DES MOINES – Together with the Boards and Commissions Review Committee, Governor Reynolds is calling for public input on proposed recommendations to reform Iowa's board and commissions.

The Boards and Commissions Review Committee, created in the Governor's alignment bill, is responsible for reviewing the efficiency and effectiveness of all boards, commissions, and other similar entities created in Iowa law. Based on the Committee's ongoing review, its members have proposed preliminary recommendations, [which can be found online here](#). The Committee is required to submit a report containing its final findings and recommendations to the Governor and the general assembly no later than September 30, 2023.

"Iowans should submit their feedback on the committee's preliminary recommendations, helping this committee put together a well-rounded final proposal. Reviewing Iowa's 256 Boards and Commissions is long overdue, and Iowans now have the chance to weigh in on how their taxpayer dollars should be used to support them," said Gov. Kim Reynolds.

Members of the public and interested stakeholders can submit comments on the Committee's preliminary recommendations by sending an email to BCRCcomments@iowa.gov.

The Boards and Commissions Review Committee will also hold a meeting in Room 103 of the State Capitol (Old Supreme Court Chamber) on **Wednesday, September 6, 2023, at 12:00 p.m.** for further public input on recommendations to be made by the Committee.

If members of the public are interested in addressing the committee at its September 6th meeting, please email BCRCcomments@iowa.gov and request to speak. Please include your name and if you are representing an organization.

###

Stay Connected with the Office of the Governor of Iowa:



[Manage Subscriptions](#) | [Help](#)

This email was sent to [REDACTED] using GovDelivery Communications Cloud on behalf of: [State of Iowa · 1007 E Grand Ave · Des Moines, IA 50319](#)



--

Best regards,





Comments, BCRC <bcrccomments@iowa.gov>

Comment regarding consolidation of licensure boards

1 message

Tue, Sep 12, 2023 at 10:28 AM

To: bcrccomments@iowa.gov

Hello,

I am writing in opposition to the proposed consolidation of licensure boards, specifically, the elimination of the Board of Social Work and the Board of Psychology, collapsing both of these boards into an expanded Board of Behavioral Health.

I am writing from the perspective of a practicing licensed psychologist working at a nonprofit organization.

I can understand why, from an outside perspective, consolidating these boards seems logical. The current Board of Behavioral Health already oversees mental health therapists, and social workers and psychologists also provide mental health therapy. It is understandable that one would think that one board could oversee all four professions.

What is lost in that outsider's understanding is that social workers and psychologists both provide a wide range of services that are not therapy. I cannot speak to social workers specifically (because I am not one) but my understanding is that they tend to fill a large variety of roles outside of providing therapy that a board designed to oversee therapists is not prepared to manage.

The same is true for psychologists. Psychologists have a broad scope of practice, but the most common service we provide, aside from mental health therapy, is psychological assessment. Psychological assessment can include neuropsychological, cognitive, personality, and emotional functioning assessments that require complex interpretation.

Psychological assessment is a tool used to answer a wide variety of questions: whether someone has ADHD or Autism, whether a veteran's PTSD was caused by military service, whether a person is a good candidate for bariatric surgery, whether a person is competent to stand trial, whether a person is beginning to show symptoms of dementia, and many more

It is unreasonable to ask non-psychologists to understand and govern this work of psychologists. Social workers, marriage and family therapists, and mental health counselors do not have training or knowledge about psychological assessment. It is unreasonable to ask them to learn the legal codes governing ethical assessment services and apply those to psychologists. There is a reason that we have members of a profession make up a large part of the boards for that profession - it is because the board needs to understand the work their licensees are doing. I would not be a competent member of a board overseeing social workers - I don't understand their scope of practice and I'm not familiar with their legal or ethics codes. The same would be true in reverse.

Psychologists have a complex, challenging job. It is a job where we have a huge amount of potential to help people who really need it. What comes with that potential for good, though, is the potential to do a lot of harm. I want Iowans to know that if they seek the services of a psychologist, they will not encounter that potential harm. I want Iowans to feel confident that they can go to any psychologist in Iowa and find someone with appropriate training, who keeps up with continuing education, who will act in their client's best interest, and will not harm them. The only way for Iowans to know these things is to have a robust, appropriately resourced, Board of Psychology making sure these things are true of all psychologists in Iowa, and taking action in any cases where these things are not true.

Thank you for your time,

[Redacted signature]

--

[Redacted signature]

Licensed Psychologist & Health Service Provider in Psychology

[Redacted signature]



CONFIDENTIALITY NOTICE: This email is covered by the Electronic Communications Privacy Act, 18 USC/2510-2521, is confidential, and may be legally privileged. If you are not the intended recipient, you are hereby notified that any retention, dissemination, distribution, or copying of this communication is strictly prohibited by law. Please reply to the sender that you have received it in error, then delete it. FURTHERMORE, even if you are the intended recipient and this communication contains mental health information, it is still protected, confidential information under Federal law (42 CFR Part 2) and Chap. 228 and Sec. 141.23(3) of the Iowa Code. Further disclosure of this information without appropriate authorization is unlawful and subject to civil and criminal penalties. A general release of medical information is NOT sufficient for this purpose. Please be advised that e-mail communication is not perfectly confidential, by responding you assume all risks that the medium may present, including without limitation, hacking, electronic interruption or interception by persons known or unknown, local or not, the distribution of personal information so gained on the internet, and any other risk to privacy, personal information or other e-mail communication.



Comments, BCRC <bcrccomments@iowa.gov>

Merging board

1 message

Tue, Sep 12, 2023 at 1:24 PM

To: bcrccomments@iowa.gov

My name is [REDACTED] and I represent the respiratory therapy profession in the state of Iowa. I am voicing concern about the merging of the Respiratory Therapy and Polysomnography licensure board. Respiratory therapists care for individuals that have trouble breathing such as traumas, premature birth, critical illnesses, COPD and asthma to name a few. We have been vital in the care and treatment of individuals with COVID-19 and RSV. We work under the direction of physicians. For the safety of patients, it is important that we join healthcare professionals that serve like patients. When the merger occurs, we need a voice on the merged board to continue to assess competency for those practicing respiratory therapy and provide safe and effective respiratory care. We currently have 4 seats on the board, and we need to maintain these voices in a similar ratio. Given the possible list of medical boards, it seems fitting that we would fall under the board of medicine. Physicians are familiar with respiratory care, and we work in similar environments. If consolidation/merge is what is needed, I strongly urge you to maintain the voice of Respiratory Therapy on a newly merged board, suggesting the board of medicine.

Thank you for listening,
[REDACTED]



Comments, BCRC <bcrccomments@iowa.gov>

Respiratory Care and Polysomnography Board in Iowa Merger

1 message

Tue, Sep 12, 2023 at 2:32 PM

To: bcrccomments@iowa.gov

Hello, my name is [REDACTED] I am currently a respiratory therapist here in Iowa. I've also practiced in Missouri and Alabama. I just wanted to express my concerns about potentially not having the right representation on the new board merger.

A respiratory therapist has a HUGE role in critical care. **Studies have shown decreased mortality and increased prognosis rates when patients have a respiratory therapist involved in their care.** Respiratory therapists initiate and operate mechanical ventilators, intubate, extubate, draw arterial blood gases, intervene when a patient is decompensating, give breathing and respiratory treatments, and make recommendations about patient care (to name a few roles we play). We are involved in ALL codes, rapid responses, and traumas. With regards to the ventilator alone, to give you an idea most nursing programs only spend 2 weeks and medical schools only spend up to 4 weeks learning respiratory and ventilator management **whereas we spend and entire semester on that subject alone.** We know a lot and understand the different management techniques and their potential complications. We are looked to whenever it regards respiratory status of a patient. Whenever I tell someone what a respiratory therapist is I say it's basically a specialized nurse just for your lungs.

The merger that is going to happen could potentially take away our voice without adequate representation. Giving a physical therapist or chiropractor the power to determine what to do with respiratory could cause the field to go downhill. While they deal with mostly chronic problems (we do too), we deal with **A LOT** of acute issues. They may not understand exactly what we do or how vital we are to patient care. We require autonomy to function at our best. This ability to make a difference in patients lives helps motivate great people to come into the respiratory field. If that is lost then we may lose that motivation and consequently potentially great respiratory professionals. Which, in return, can increase patient mortality rates (as mentioned above we do very well at decreasing this rate). I also worry about the potential snowball effect that can have on our communities.

In conclusion, if the merger must happen I request that we have more than one respiratory representative on the new board. We currently have 4 on our board and I understand it'd be hard to keep that many, I ask to have at least 2. Thank you for your time!

[REDACTED]

Sent from my iPhone



Comments, BCRC <bcrccomments@iowa.gov>

Proposed elimination of the Board of Dietetics

1 message

Tue, Sep 12, 2023 at 3:40 PM

To: BCRCcomments@iowa.gov

Dear Members of the Boards and Commissions Review Committee,

I am a Registered Dietitian with almost 30 years of experience in the profession of providing Medical Nutrition Therapy to help patients and clients manage and maintain their health. I am sending this message in regard to the subcommittee recommendations that were issued on August 29, 2023. I am aware that within this report is a recommendation to eliminate the Iowa Board of Dietetics. As a registered and licensed dietitian nutritionist (RDN) in Iowa, this recommendation not only impacts my ability to continue my practice but also impacts **the constitutional duty of our state government to protect its citizens**. I strongly advise against the elimination of the Board of Dietetics and our licensure for the following reasons:

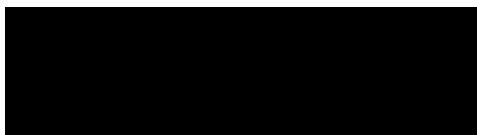
- **RDNs are specialized, highly trained healthcare professionals.** Similar to other healthcare professions with boards recommended to “continue,” RDNs must complete rigorous coursework that meets the accreditation standards within the Academy of Nutrition and Dietetics; complete a >1,000 hour supervised practicum; pass a national board examination; and take yearly continuing education.
- **RDNs are uniquely qualified to practice specialized nutrition care or Medical Nutrition Therapy.** RDNs scope of practice allows them to prescribe therapeutic diets to mitigate the effects of acute or chronic disease; to provide alternative nutrition when oral feeding is not possible or unsafe; to counsel individuals who are in need of improved nutrition; and to provide individualized nutritional guidance within the context of specific surgeries, drugs or treatments. Would you want an untrained, unlicensed professional providing that type of care for you, your child, or other loved one?
- **The Board of Dietetics protects Iowa citizens from unethical, harmful nutrition care.** The Board of Dietetics vets licensure applicants to ensure that competent, properly educated, ethically sound individuals practice as RDNs in Iowa. Applicants who have been found to be in violation of the law, derelict, impaired, or negligent in their practice, or who have engaged in practices that are not a part of the RDNs scope of practice are not granted licensure to practice in Iowa. Likewise, licensed dietitian practitioners found to be in similar violation or have not maintained continuing education requirements face sanction from this Board, with the possibility of probation or suspension of the license to practice.
- **Dietetic licensure has become THE standard requirement for employment for most of the 1100+ licensees within Iowa.** Registered Dietitians without licenses are not considered adequately credentialed for hire with healthcare organizations in Iowa. Infringement on this Board and with Dietetic Licensure would not be conducive to job creation.
- **The livelihood of many Iowa dietitians depends on licensure-required reimbursement.** Licensure provides health insurance companies and state and federal governments with the assurance that practitioners meet standards of professional competence in order to be reimbursed for providing nutrition care services. In Iowa, medical nutrition therapy and therapeutic diets are provided by Registered AND Licensed Dietitians, and it is in Iowa law

that these services MUST be provided by Registered AND Licensed Dietitians for insurance payment. This comes into play at the hospital/clinic levels, as well as long-term care facilities.

- **There is no taxpayer expense associated with the Board of Dietetics.** The fees that Licensed Dietitians pay to renew their license cover all costs incurred by the department that provides oversight. This Board has proven to be cost-effective and it operates consistently in the black each year.
- **The Board of Dietetics is efficient with its meetings.** The Board of Dietetics meets quarterly, and as needed. It has held virtual meetings for several years, when appropriate.
- **The Board of Dietetics compensates its members.** The Board of Dietetics is comprised of both professional and citizen members and these Board members are provided compensation for their service to the citizens of Iowa.
- **We need licensure in Iowa in order to be part of the interstate compact that the Academy of Nutrition and Dietetics at the national level is working toward.**

I urge this subcommittee to reconsider the recommendation to eliminate the Board of Dietetics when it provides a final report to the Governor later this month.

Thank you for your consideration in this matter





Comments, BCRC <bcrccomments@iowa.gov>

ADVOCACY TO PROTECT THE BOARD OF DIETETICS AND LICENSURE

1 message

Tue, Sep 12, 2023 at 3:42 PM

To: BCRCcomments@iowa.gov

Dear Members of the Boards and Commissions Review Committee,

My name is Rachel Voet and I have previously served Iowa State University's Athletic Department as the Director of Sport Nutrition for Football for the past three and a half years. I recently accepted a position in University of Nebraska, Lincoln's Athletic Department. I treasured my time in Iowa and still have many colleagues who practice as Registered Dietitians in the state. Licensure for the Registered Dietitian is critical.

I am sending this message in regard to the subcommittee recommendations that were issued on August 29, 2023. I am aware that within this report is a recommendation to eliminate the Iowa Board of Dietetics. As a registered and licensed dietitian nutritionist (RDN) in Iowa, this recommendation not only impacts my ability to continue my practice but also impacts **the constitutional duty of our state government to protect its citizens**. I strongly advise against the elimination of the Board of Dietetics and our licensure for the following reasons:

- **RDNs are specialized, highly trained healthcare professionals.** Similar to other healthcare professions with boards recommended to "continue," RDNs must complete rigorous coursework that meets the accreditation standards within the Academy of Nutrition and Dietetics; complete a >1,000 hour supervised practicum; pass a national board examination; and take yearly continuing education.
- **RDNs are uniquely qualified to practice specialized nutrition care or Medical Nutrition Therapy.** RDNs scope of practice allows them to prescribe therapeutic diets to mitigate the effects of acute or chronic disease; to provide alternative nutrition when oral feeding is not possible or unsafe; to counsel individuals who are in need of improved nutrition; and to provide individualized nutritional guidance within the context of specific surgeries, drugs or treatments. Would you want an untrained, unlicensed professional providing that type of care for you, your child, or other loved one?
- **The Board of Dietetics protects Iowa citizens from unethical, harmful nutrition care.** The Board of Dietetics vets licensure applicants to ensure that competent, properly educated, ethically sound individuals practice as RDNs in Iowa. Applicants who have been found to be in violation of the law, derelict, impaired, or negligent in their practice, or who have engaged in practices that are not a part of the RDNs scope of practice are not granted licensure to practice in Iowa. Likewise, licensed dietitian practitioners found to be in similar violation or have not maintained continuing education requirements face sanction from this Board, with the possibility of probation or suspension of the license to practice.
- **Dietetic licensure has become THE standard requirement for employment for most of the 1100+ licensees within Iowa.** Registered Dietitians without licenses are not considered adequately credentialed for hire with healthcare organizations in Iowa. Infringement on this Board and with Dietetic Licensure would not be conducive to job creation.
- **The livelihood of many Iowa dietitians depends on licensure-required reimbursement.** Licensure provides health insurance companies and state and federal governments with the

assurance that practitioners meet standards of professional competence in order to be reimbursed for providing nutrition care services. In Iowa, medical nutrition therapy and therapeutic diets are provided by Registered AND Licensed Dietitians, and it is in Iowa law that these services MUST be provided by Registered AND Licensed Dietitians for insurance payment. This comes into play at the hospital/clinic levels, as well as long-term care facilities.

- **There is no taxpayer expense associated with the Board of Dietetics.** The fees that Licensed Dietitians pay to renew their license cover all costs incurred by the department that provides oversight. This Board has proven to be cost-effective and it operates consistently in the black each year.
- **The Board of Dietetics is efficient with its meetings.** The Board of Dietetics meets quarterly, and as needed. It has held virtual meetings for several years, when appropriate.
- **The Board of Dietetics compensates its members.** The Board of Dietetics is comprised of both professional and citizen members and these Board members are provided compensation for their service to the citizens of Iowa.
- **We need licensure in Iowa in order to be part of the interstate compact that the Academy of Nutrition and Dietetics at the national level is working toward.**

I urge this subcommittee to reconsider the recommendation to eliminate the Board of Dietetics when it provides a final report to the Governor later this month.

Thank you for your consideration in this matter.

Sincerely,



--




Comments, BCRC <bcrccomments@iowa.gov>

Concern over Board of Athletic Trainers

1 message

Tue, Sep 12, 2023 at 4:07 PM

To: "BCRCcomments@iowa.gov" <BCRCcomments@iowa.gov>

Dear Boards & Commissions Review Committee,

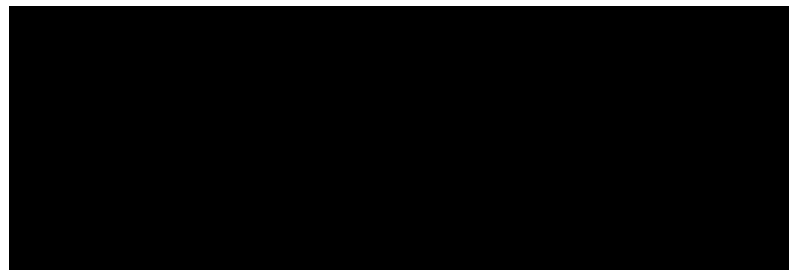
My name is [REDACTED] I am the Associate Clinical Director for CAREonsite, Inc. The reason I am contacting you is because I was recently notified that you have made a proposal to eliminate the board of athletic training. As Associate Clinical Director, one of my job functions is to oversee and ensure the Athletic Trainers at CAREonsite are operating effectively and efficiently. To do so, I have to ensure that all athletic trainers are qualified and capable to provide excellent medical care to our patients, per the medical directors' guidance and orders.

A trouble that I face is if the board of athletic training is eliminated, how will I know what the gold standard of athletic training care is? Who will provide legislative guidance that I can reference when developing standard operating procedures and other internal company documents? I oversee the clinical operations of several Iowa athletic trainers, without the board's legislative guidance, I won't be able to most effectively provide clinical direction that meets the gold standard of care for the athletic training profession.

Thank you for your time and consideration regarding this situation!

Regards,

[REDACTED]





Comments, BCRC <bcrccomments@iowa.gov>

Do not Eliminate and Consolidate Boards and Commissions related to social work1 message

To: BCRCcomments@iowa.gov

Tue, Sep 12, 2023 at 4:20 PM

Hello,

I'm writing to convey my disagreement with eliminating or consolidating the Board of Social Work, and I cannot, for the life of me, understand why this issue comes up every year as a priority.

A few years ago, there was an attempt to remove licensure boards altogether, clearly being driven by special interests groups with absolutely no care for everyday lowans. Social Workers make up the majority of licensed mental health providers in the state. Social workers carry the majority of therapy cases, case management, and high acuity clients of any profession in the state.

Who in their right mind is actually advocating to eliminate their board?

Stop messing around with stuff, if you don't understand the potential impact it will have on the 60,000+ social workers across Iowa, and on the people of Iowa, for whom if they are receiving mental health care, a safe bet is that it's from a licensed social worker.

I can imagine there are many other places within Iowa's government where cost savings can be found, rather than such a ridiculous proposition. I truly hope that someone making decisions possesses common sense and is being informed by those actually doing the work or receiving the services.

For the love of god, stop messing around with the licensing of mental health providers and oversight of mental health providers in the state, it's getting exhausting to have to deal with this every year.



Subcommittee recommendations to eliminate the Board of Dietetics

1 message

[REDACTED]

Tue, Sep 12, 2023 at 4:33 PM

To: BCRCcomments@iowa.gov

Dear Members of the Boards and Commissions Review Committee,

My name is [REDACTED] and I have been a dietitian for 10 years.

I am sending this message in regard to the subcommittee recommendations that were issued on August 29, 2023. I am aware that within this report is a recommendation to eliminate the Iowa Board of Dietetics. As a registered and licensed dietitian nutritionist (RDN) in Iowa, this recommendation not only impacts my ability to continue my practice but also impacts **the constitutional duty of our state government to protect its citizens**. I strongly advise against the elimination of the Board of Dietetics and our licensure for the following reasons:

- **RDNs are specialized, highly trained healthcare professionals.** Similar to other healthcare professions with boards recommended to “continue,” RDNs must complete rigorous coursework that meets the accreditation standards within the Academy of Nutrition and Dietetics; complete a >1,000 hour supervised practicum; pass a national board examination; and take yearly continuing education.
- **RDNs are uniquely qualified to practice specialized nutrition care or Medical Nutrition Therapy.** RDNs scope of practice allows them to prescribe therapeutic diets to mitigate the effects of acute or chronic disease; to provide alternative nutrition when oral feeding is not possible or unsafe; to counsel individuals who are in need of improved nutrition; and to provide individualized nutritional guidance within the context of specific surgeries, drugs or treatments. Would you want an untrained, unlicensed professional providing that type of care for you, your child, or other loved one?
- **The Board of Dietetics protects Iowa citizens from unethical, harmful nutrition care.** The Board of Dietetics vets licensure applicants to ensure that competent, properly educated, ethically sound individuals practice as RDNs in Iowa. Applicants who have been found to be in violation of the law, derelict, impaired, or negligent in their practice, or who have engaged in practices that are not a part of the RDNs scope of practice are not granted licensure to practice in Iowa. Likewise, licensed dietitian practitioners found to be in similar violation or have not maintained continuing education requirements face sanction from this Board, with the possibility of probation or suspension of the license to practice.
- **Dietetic licensure has become THE standard requirement for employment for most of the 1100+ licensees within Iowa.** Registered Dietitians without licenses are not considered adequately credentialed for hire with healthcare organizations in Iowa. Infringement on this Board and with Dietetic Licensure would not be conducive to job creation.
- **The livelihood of many Iowa dietitians depends on licensure-required reimbursement.** Licensure provides health insurance companies and state and federal governments with the assurance that practitioners meet standards of professional competence in order to be reimbursed for providing nutrition care services. In Iowa, medical nutrition therapy and

therapeutic diets are provided by Registered AND Licensed Dietitians, and it is in Iowa law that these services MUST be provided by Registered AND Licensed Dietitians for insurance payment. This comes into play at the hospital/clinic levels, as well as long-term care facilities.

- **There is no taxpayer expense associated with the Board of Dietetics.** The fees that Licensed Dietitians pay to renew their license cover all costs incurred by the department that provides oversight. This Board has proven to be cost-effective and it operates consistently in the black each year.
- **The Board of Dietetics is efficient with its meetings.** The Board of Dietetics meets quarterly, and as needed. It has held virtual meetings for several years, when appropriate.
- **The Board of Dietetics compensates its members.** The Board of Dietetics is comprised of both professional and citizen members and these Board members are provided compensation for their service to the citizens of Iowa.
- **We need licensure in Iowa in order to be part of the interstate compact that the Academy of Nutrition and Dietetics at the national level is working toward.**

I urge this subcommittee to reconsider the recommendation to eliminate the Board of Dietetics when it provides a final report to the Governor later this month.



Comments, BCRC <bcrccomments@iowa.gov>

Board Consolidations

1 message

[REDACTED]
To: BCRCcomments@iowa.gov

Tue, Sep 12, 2023 at 4:35 PM

I am a licensed Master's level Social Worker and therapist and am asking that the Board of Social Work not be watered down by consolidation with other Boards. With mental health issues at such a high level with subsequent suicides on the rise every day, please do not make it harder for this profession to do its job.



Comments, BCRC <bcrccomments@iowa.gov>

Dietetic Licensure

1 message

Tue, Sep 12, 2023 at 4:58 PM

To: "BCRCcomments@iowa.gov" <BCRCcomments@iowa.gov>, "charlie.mcclintock@legis.iowa.gov" <charlie.mcclintock@legis.iowa.gov>, "cindy.golding@legis.iowa.gov" <cindy.golding@legis.iowa.gov>

Dear Members of the Boards and Commissions Review Committee and Mr. McClintock and Mrs. Golding,

My name is [REDACTED] and I work at Mercy Medical Center as a dietitian in the intensive care unit. I write orders for patients that receive tube feeding and feedings through a central vein. I am specially trained to competently provide essential care to critically ill lowans. This is not a task you want anyone to provide. We should demand high quality care and those providing that care should meet standards verified by the state of Iowa.

I am sending this message in regard to the subcommittee recommendations that were issued on August 29, 2023. I am aware that within this report is a recommendation to eliminate the Iowa Board of Dietetics. As a registered and licensed dietitian nutritionist (RDN) in Iowa, this recommendation not only impacts my ability to continue my practice but also impacts **the constitutional duty of our state government to protect its citizens**. I strongly advise against the elimination of the Board of Dietetics and our licensure for the following reasons:

- **RDNs are specialized, highly trained healthcare professionals.** Similar to other healthcare professions with boards recommended to "continue," RDNs must complete rigorous coursework that meets the accreditation standards within the Academy of Nutrition and Dietetics; complete a >1,000 hour supervised practicum; pass a national board examination; and take yearly continuing education.
- **RDNs are uniquely qualified to practice specialized nutrition care or Medical Nutrition Therapy.** RDNs scope of practice allows them to prescribe therapeutic diets to mitigate the effects of acute or chronic disease; to provide alternative nutrition when oral feeding is not possible or unsafe; to counsel individuals who are in need of improved nutrition; and to provide individualized nutritional guidance within the context of specific surgeries, drugs or treatments. Would you want an untrained, unlicensed professional providing that type of care for you, your child, or other loved one?
- **The Board of Dietetics protects Iowa citizens from unethical, harmful nutrition care.** The Board of Dietetics vets licensure applicants to ensure that competent, properly educated, ethically sound individuals practice as RDNs in Iowa. Applicants who have been found to be in violation of the law, derelict, impaired, or negligent in their practice, or who have engaged in practices that are not a part of the RDNs scope of practice are not granted licensure to practice in Iowa. Likewise, licensed dietitian practitioners found to be in similar violation or have not maintained continuing education requirements face sanction from this Board, with the possibility of probation or suspension of the license to practice.
- **Dietetic licensure has become THE standard requirement for employment for most of the 1100+ licensees within Iowa.** Registered Dietitians without licenses are not considered

adequately credentialed for hire with healthcare organizations in Iowa. Infringement on this Board and with Dietetic Licensure would not be conducive to job creation.

- **The livelihood of many Iowa dietitians depends on licensure-required reimbursement.** Licensure provides health insurance companies and state and federal governments with the assurance that practitioners meet standards of professional competence in order to be reimbursed for providing nutrition care services. In Iowa, medical nutrition therapy and therapeutic diets are provided by Registered AND Licensed Dietitians, and it is in Iowa law that these services MUST be provided by Registered AND Licensed Dietitians for insurance payment. This comes into play at the hospital/clinic levels, as well as long-term care facilities.
- **There is no taxpayer expense associated with the Board of Dietetics.** The fees that Licensed Dietitians pay to renew their license cover all costs incurred by the department that provides oversight. This Board has proven to be cost-effective and it operates consistently in the black each year.
- **The Board of Dietetics is efficient with its meetings.** The Board of Dietetics meets quarterly, and as needed. It has held virtual meetings for several years, when appropriate.
- **The Board of Dietetics compensates its members.** The Board of Dietetics is comprised of both professional and citizen members and these Board members are provided compensation for their service to the citizens of Iowa.
- **We need licensure in Iowa in order to be part of the interstate compact that the Academy of Nutrition and Dietetics at the national level is working toward.**

I urge this subcommittee to reconsider the recommendation to eliminate the Board of Dietetics when it provides a final report to the Governor later this month.

Thank you for your consideration in this matter.

[Insert contact information including street address]



Comments, BCRC <bcrccomments@iowa.gov>

Dietetics license

1 message

Tue, Sep 12, 2023 at 5:09 PM

To: BCRCcomments@iowa.gov

Dear Members of the Boards and Commissions Review Committee,

I am a practicing registered and licensed dietitian in Iowa for the past 21 years. Throughout my career, I have provided highly skilled care in enteral and parenteral nutrition while working at a Trauma Level 1 medical facility in Des Moines. In this critical care unit, expertise as a registered and licensed dietitian is essential for patient safety. Lives are very much at stake in the intensive care unit, regarding nutrition in particular.

I am sending this message in regard to the subcommittee recommendations that were issued on August 29, 2023. I am aware that within this report is a recommendation to eliminate the Iowa Board of Dietetics. As a registered and licensed dietitian nutritionist (RDN) in Iowa, this recommendation not only impacts my ability to continue my practice but also impacts **the constitutional duty of our state government to protect its citizens**. I strongly advise against the elimination of the Board of Dietetics and our licensure for the following reasons:

- **RDNs are specialized, highly trained healthcare professionals.** Similar to other healthcare professions with boards recommended to “continue,” RDNs must complete rigorous coursework that meets the accreditation standards within the Academy of Nutrition and Dietetics; complete a >1,000 hour supervised practicum; pass a national board examination; and take yearly continuing education.
- **RDNs are uniquely qualified to practice specialized nutrition care or Medical Nutrition Therapy.** RDNs scope of practice allows them to prescribe therapeutic diets to mitigate the effects of acute or chronic disease; to provide alternative nutrition when oral feeding is not possible or unsafe; to counsel individuals who are in need of improved nutrition; and to provide individualized nutritional guidance within the context of specific surgeries, drugs or treatments. Would you want an untrained, unlicensed professional providing that type of care for you, your child, or other loved one?
- **The Board of Dietetics protects Iowa citizens from unethical, harmful nutrition care.** The Board of Dietetics vets licensure applicants to ensure that competent, properly educated, ethically sound individuals practice as RDNs in Iowa. Applicants who have been found to be in violation of the law, derelict, impaired, or negligent in their practice, or who have engaged in practices that are not a part of the RDNs scope of practice are not granted licensure to practice in Iowa. Likewise, licensed dietitian practitioners found to be in similar violation or have not maintained continuing education requirements face sanction from this Board, with the possibility of probation or suspension of the license to practice.
- **Dietetic licensure has become THE standard requirement for employment for most of the 1100+ licensees within Iowa.** Registered Dietitians without licenses are not considered adequately credentialed for hire with healthcare organizations in Iowa. Infringement on this Board and with Dietetic Licensure would not be conducive to job creation.

- **The livelihood of many Iowa dietitians depends on licensure-required reimbursement.** Licensure provides health insurance companies and state and federal governments with the assurance that practitioners meet standards of professional competence in order to be reimbursed for providing nutrition care services. In Iowa, medical nutrition therapy and therapeutic diets are provided by Registered AND Licensed Dietitians, and it is in Iowa law that these services MUST be provided by Registered AND Licensed Dietitians for insurance payment. This comes into play at the hospital/clinic levels, as well as long-term care facilities.
- **There is no taxpayer expense associated with the Board of Dietetics.** The fees that Licensed Dietitians pay to renew their license cover all costs incurred by the department that provides oversight. This Board has proven to be cost-effective and it operates consistently in the black each year.
- **The Board of Dietetics is efficient with its meetings.** The Board of Dietetics meets quarterly, and as needed. It has held virtual meetings for several years, when appropriate.
- **The Board of Dietetics compensates its members.** The Board of Dietetics is comprised of both professional and citizen members and these Board members are provided compensation for their service to the citizens of Iowa.
- **We need licensure in Iowa in order to be part of the interstate compact that the Academy of Nutrition and Dietetics at the national level is working toward.**

I urge this subcommittee to reconsider the recommendation to eliminate the Board of Dietetics when it provides a final report to the Governor later this month.

Thank you for your consideration in this matter.





Comments, BCRC <bcrccomments@iowa.gov>

Board of Dietetics elimination

1 message

Tue, Sep 12, 2023 at 6:16 PM

To: BCRCcomments@iowa.gov

Dear Members of the Boards and Commissions Review Committee,

My name is [REDACTED] and I have been a licensed Registered Dietitian for the past 20 years.

I am sending this message in regard to the subcommittee recommendations that were issued on August 29, 2023. I am aware that within this report is a recommendation to eliminate the Iowa Board of Dietetics. As a registered and licensed dietitian nutritionist (RDN) in Iowa, this recommendation not only impacts my ability to continue my practice but also impacts **the constitutional duty of our state government to protect its citizens**. I strongly advise against the elimination of the Board of Dietetics and our licensure for the following reasons:

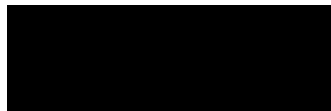
- **RDNs are specialized, highly trained healthcare professionals.** Similar to other healthcare professions with boards recommended to “continue,” RDNs must complete rigorous coursework that meets the accreditation standards within the Academy of Nutrition and Dietetics; complete a >1,000 hour supervised practicum; pass a national board examination; and take yearly continuing education.
- **RDNs are uniquely qualified to practice specialized nutrition care or Medical Nutrition Therapy.** RDNs scope of practice allows them to prescribe therapeutic diets to mitigate the effects of acute or chronic disease; to provide alternative nutrition when oral feeding is not possible or unsafe; to counsel individuals who are in need of improved nutrition; and to provide individualized nutritional guidance within the context of specific surgeries, drugs or treatments. Would you want an untrained, unlicensed professional providing that type of care for you, your child, or other loved one?
- **The Board of Dietetics protects Iowa citizens from unethical, harmful nutrition care.** The Board of Dietetics vets licensure applicants to ensure that competent, properly educated, ethically sound individuals practice as RDNs in Iowa. Applicants who have been found to be in violation of the law, derelict, impaired, or negligent in their practice, or who have engaged in practices that are not a part of the RDNs scope of practice are not granted licensure to practice in Iowa. Likewise, licensed dietitian practitioners found to be in similar violation or have not maintained continuing education requirements face sanction from this Board, with the possibility of probation or suspension of the license to practice.
- **Dietetic licensure has become THE standard requirement for employment for most of the 1100+ licensees within Iowa.** Registered Dietitians without licenses are not considered adequately credentialed for hire with healthcare organizations in Iowa. Infringement on this Board and with Dietetic Licensure would not be conducive to job creation.
- **The livelihood of many Iowa dietitians depends on licensure-required reimbursement.** Licensure provides health insurance companies and state and federal governments with the assurance that practitioners meet standards of professional competence in order to be reimbursed for providing nutrition care services. In Iowa, medical nutrition therapy and therapeutic diets are provided by Registered AND Licensed Dietitians, and it is in Iowa law

that these services MUST be provided by Registered AND Licensed Dietitians for insurance payment. This comes into play at the hospital/clinic levels, as well as long-term care facilities.

- **There is no taxpayer expense associated with the Board of Dietetics.** The fees that Licensed Dietitians pay to renew their license cover all costs incurred by the department that provides oversight. This Board has proven to be cost-effective and it operates consistently in the black each year.
- **The Board of Dietetics is efficient with its meetings.** The Board of Dietetics meets quarterly, and as needed. It has held virtual meetings for several years, when appropriate.
- **The Board of Dietetics compensates its members.** The Board of Dietetics is comprised of both professional and citizen members and these Board members are provided compensation for their service to the citizens of Iowa.
- **We need licensure in Iowa in order to be part of the interstate compact that the Academy of Nutrition and Dietetics at the national level is working toward.**

I urge this subcommittee to reconsider the recommendation to eliminate the Board of Dietetics when it provides a final report to the Governor later this month.

Thank you for your consideration in this matter.



Sent from my iPhone
Please excuse typos and brevity.



Comments, BCRC <bcrccomments@iowa.gov>

BCRC Proposed Elimination of the Board of Athletic Training

1 message

To: bcrccomments@iowa.gov

Tue, Sep 12, 2023 at 7:48 PM

My name is Bailey Hanson , I am an athletic trainer, formerly practicing as a licensed athletic trainer in the state of Iowa for 5 years.

The BCRC has proposed the elimination of the Board of Athletic Training. As a healthcare provider, I am concerned about the impact of this proposal on the health and safety of the public. By eliminating AT licensure, it would allow untrained or unqualified individuals to pose as a healthcare provider. Licensure is the standard regulatory practice for health care professionals, elimination will risk the health and safety of individuals ATs serve, as well as deter ATs from seeking employment in our state.

Please see the points listed below to demonstrate the importance of maintaining the Board of Athletic Training:

- Members of the board are all volunteers, including physicians and athletic trainers. Physicians provide direct supervision to ATs, which is why they are members.
- The board evaluates AT scope of practice in the state.
- The board handles disciplinary action and evaluates new ATs moving to the state.
- The board is self-sustaining, operating at no cost to the state.

Please reach out to the committee members to maintain the Board of Athletic Training. I am happy to answer any questions, please contact me by email at [REDACTED]



Comments, BCRC <bcrccomments@iowa.gov>

Board of Dietetics

1 message

Tue, Sep 12, 2023 at 7:49 PM

[REDACTED]
To: BCRCcomments@iowa.gov

Dear Members of the Boards and Commissions Review Committee,

My name is [REDACTED] and I have been a registered and licensed dietitian in the state of Iowa for the past 23 years. My experience is with older adults in long term care facilities and memory care units. Currently I work in community nutrition with older adults that are high nutritional risk and low-income status.

I am sending this message in regard to the subcommittee recommendations that were issued on August 29, 2023. I am aware that within this report is a recommendation to eliminate the Iowa Board of Dietetics. As a registered and licensed dietitian nutritionist (RDN) in Iowa, this recommendation not only impacts my ability to continue my practice but also impacts **the constitutional duty of our state government to protect its citizens**. I strongly advise against the elimination of the Board of Dietetics and our licensure for the following reasons:

- **RDNs are specialized, highly trained healthcare professionals.** Similar to other healthcare professions with boards recommended to “continue,” RDNs must complete rigorous coursework that meets the accreditation standards within the Academy of Nutrition and Dietetics; complete a >1,000 hour supervised practicum; pass a national board examination; and take yearly continuing education.
- **RDNs are uniquely qualified to practice specialized nutrition care or Medical Nutrition Therapy.** RDNs scope of practice allows them to prescribe therapeutic diets to mitigate the effects of acute or chronic disease; to provide alternative nutrition when oral feeding is not possible or unsafe; to counsel individuals who are in need of improved nutrition; and to provide individualized nutritional guidance within the context of specific surgeries, drugs or treatments. Would you want an untrained, unlicensed professional providing that type of care for you, your child, or other loved one?

- **The Board of Dietetics protects Iowa citizens from unethical, harmful nutrition care.** The Board of Dietetics vets licensure applicants to ensure that competent, properly educated, ethically sound individuals practice as RDNs in Iowa. Applicants who have been found to be in violation of the law, derelict, impaired, or negligent in their practice, or who have engaged in practices that are not a part of the RDNs scope of practice are not granted licensure to practice in Iowa. Likewise, licensed dietitian practitioners found to be in similar violation or have not maintained continuing education requirements face sanction from this Board, with the possibility of probation or suspension of the license to practice.
- **Dietetic licensure has become THE standard requirement for employment for most of the 1100+ licensees within Iowa.** Registered Dietitians without licenses are not considered adequately credentialed for hire with healthcare organizations in Iowa. Infringement on this Board and with Dietetic Licensure would not be conducive to job creation.
- **The livelihood of many Iowa dietitians depends on licensure-required reimbursement.** Licensure provides health insurance companies and state and federal governments with the assurance that practitioners meet standards of professional competence in order to be reimbursed for providing nutrition care services. In Iowa, medical nutrition therapy and therapeutic diets are provided by Registered AND Licensed Dietitians, and it is in Iowa law that these services MUST be provided by Registered AND Licensed Dietitians for insurance payment. This comes into play at the hospital/clinic levels, as well as long-term care facilities.
- **There is no taxpayer expense associated with the Board of Dietetics.** The fees that Licensed Dietitians pay to renew their license cover all costs incurred by the department that provides oversight. This Board has proven to be cost-effective and it operates consistently in the black each year.
- **The Board of Dietetics is efficient with its meetings.** The Board of Dietetics meets quarterly, and as needed. It has held virtual meetings for several years, when appropriate.
- **The Board of Dietetics compensates its members.** The Board of Dietetics is comprised of both professional and citizen members and these Board members are provided compensation for their service to the citizens of Iowa.
- **We need licensure in Iowa in order to be part of the interstate compact that the Academy of Nutrition and Dietetics at the national level is working toward.**

I urge this subcommittee to reconsider the recommendation to eliminate the Board of Dietetics when it provides a final report to the Governor later this month.

Thank you for your consideration in this matter.





Comments, BCRC <bcrccomments@iowa.gov>

IA ATC Licensure at Risk

1 message

Tue, Sep 12, 2023 at 7:49 PM

To: "bcrccomments@iowa.gov" <bcrccomments@iowa.gov>

Hi,

My name is [REDACTED] I am an athletic trainer and one of your constituents in District 23. The BCRC has proposed the elimination of the Board of Athletic Training. As a licensed health care provider, I am concerned about the impact of this proposal on the health and safety of the public. By eliminating AT licensure, it would allow untrained or unqualified individuals to pose as a healthcare provider. To obtain AT licensure an individual must complete a bachelors degree from an accredited university and go on to complete a masters degree in athletic training. A significant amount of education is required to be a licensed athletic trainer.

Licensure is the standard regulatory practice for health care professionals eliminating this will risk the health and safety of individuals ATs serve. This also deters ATs seeking employment in our state. Members on the board are all volunteers, including physicians and athletic trainers. The board evaluates the AT scope of practice in the state. The board handles disciplinary action and evaluates new ATs moving to the state. The board is self-sustaining, operating at no cost to the state. Please reach out to the committee members to maintain the Board of Athletic Training. I am happy to answer any questions, please contact me via email or phone 712-540-0852.

Licensed athletic trainers are vital to our local communities in Iowa. Keeping athletes safe is our number 1 priority.

If you are still questioning the importance of a licensed athletic trainer please refer to the Bills vs. Bengals game on 1/9/2023 when Denny Kellington, ATC, LAT saved Damar Hamlins life on live TV.

Thank you for your time and consideration,

[REDACTED]



Comments, BCRC <bcrccomments@iowa.gov>

Dietetic licensure

1 message

[REDACTED]
To: "BCRCcomments@iowa.gov" <BCRCcomments@iowa.gov>

Tue, Sep 12, 2023 at 7:52 PM

I am a Licensed Registered Dietitian currently working in Iowa. I strongly support the following:

A report from the Governor's Boards and Commissions Review Committee recommends eliminating the Board of Dietetics. The Iowa Academy policy team has been informed that the Boards and Commissions Review Committee is also planning to recommend the removal of dietetic licensure.

Having worked as a dietitian for over 20 years I see the licensure requirement unnecessary considering every dietitian must maintain their Registered Dietitian certification, which includes the same amount of continuing education as the licensure requires.

Thank you for considering removal of the licensure requirement.

[REDACTED]

Sent from my iPad



Comments, BCRC <bcrccomments@iowa.gov>

Registered Dietitian Nutritionist Licensure

1 message

Tue, Sep 12, 2023 at 8:33 PM

To: BCRCcomments@iowa.gov

My name is [REDACTED] I have been a registered and licensed dietitian for over 30 years, employed in the hospital setting. I have been responsible for providing evidence based medical nutrition therapy to my patients, advising physicians evidence-based nutrition therapy, teaching residents, hospitalists, and intensivists (critical care). I was certified in Nutrion Support (total Parenteral nutrition via IV's and tube feedings to people who cannot eat), recommending the prescriptions for this nutrition therapy to the physicians for our patients.

I am sending this message in regard to the subcommittee recommendations that were issued on August 29, 2023. I am aware that within this report is a recommendation to eliminate the Iowa Board of Dietetics. As a registered and licensed dietitian nutritionist (RDN) in Iowa, this recommendation not only impacts my ability to continue my practice but also impacts **the constitutional duty of our state government to protect its citizens**. I strongly advise against the elimination of the Board of Dietetics and our licensure for the following reasons:

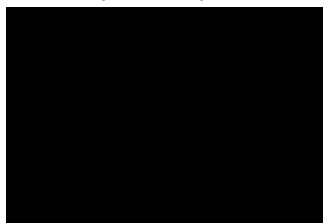
- **RDNs are specialized, highly trained healthcare professionals.** Similar to other healthcare professions with boards recommended to "continue," RDNs must complete rigorous coursework that meets the accreditation standards within the Academy of Nutrition and Dietetics; complete a >1,000 hour supervised practicum; pass a national board examination; and take yearly continuing education.
- **RDNs are uniquely qualified to practice specialized nutrition care or Medical Nutrition Therapy.** RDNs scope of practice allows them to prescribe therapeutic diets to mitigate the effects of acute or chronic disease; to provide alternative nutrition when oral feeding is not possible or unsafe; to counsel individuals who are in need of improved nutrition; and to provide individualized nutritional guidance within the context of specific surgeries, drugs or treatments. Would you want an untrained, unlicensed professional providing that type of care for you, your child, or other loved one?
- **The Board of Dietetics protects Iowa citizens from unethical, harmful nutrition care.** The Board of Dietetics vets licensure applicants to ensure that competent, properly educated, ethically sound individuals practice as RDNs in Iowa. Applicants who have been found to be in violation of the law, derelict, impaired, or negligent in their practice, or who have engaged in practices that are not a part of the RDNs scope of practice are not granted licensure to practice in Iowa. Likewise, licensed dietitian practitioners found to be in similar violation or have not maintained continuing education requirements face sanction from this Board, with the possibility of probation or suspension of the license to practice.
- **Dietetic licensure has become THE standard requirement for employment for most of the 1100+ licensees within Iowa.** Registered Dietitians without licenses are not considered adequately credentialed for hire with healthcare organizations in Iowa. Infringement on this Board and with Dietetic Licensure would not be conducive to job creation.
- **The livelihood of many Iowa dietitians depends on licensure-required reimbursement.** Licensure provides health insurance companies and state and federal governments with the assurance that practitioners meet standards of professional competence in order to be

reimbursed for providing nutrition care services. In Iowa, medical nutrition therapy and therapeutic diets are provided by Registered AND Licensed Dietitians, and it is in Iowa law that these services MUST be provided by Registered AND Licensed Dietitians for insurance payment. This comes into play at the hospital/clinic levels, as well as long-term care facilities.

- **There is no taxpayer expense associated with the Board of Dietetics.** The fees that Licensed Dietitians pay to renew their license cover all costs incurred by the department that provides oversight. This Board has proven to be cost-effective and it operates consistently in the black each year.
- **The Board of Dietetics is efficient with its meetings.** The Board of Dietetics meets quarterly, and as needed. It has held virtual meetings for several years, when appropriate.
- **The Board of Dietetics compensates its members.** The Board of Dietetics is comprised of both professional and citizen members and these Board members are provided compensation for their service to the citizens of Iowa.
- **We need licensure in Iowa in order to be part of the interstate compact that the Academy of Nutrition and Dietetics at the national level is working toward.**

I urge this subcommittee to reconsider the recommendation to eliminate the Board of Dietetics when it provides a final report to the Governor later this month.

Thank you for your consideration in this matter,





Comments, BCRC <bcrccomments@iowa.gov>

Re: BOARDS & COMMISSIONS REVIEW COMMITTEE

1 message

Tue, Sep 12, 2023 at 9:25 PM

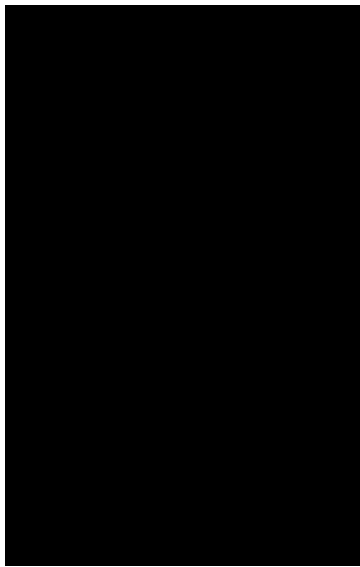
To: "BCRCcomments@iowa.gov" <BCRCcomments@iowa.gov>

Dear Boards & Commissions Review Committee,

My name is [REDACTED] I am the Co-CEO and Medical Director for for CAREonsite. The reason I am contacting you is because I was recently notified that you have made a proposal to eliminate the Board of Athletic Training. As the Co-CEO and medical director, I am focused on quality outcomes by our athletic training staff. To do so, I have to ensure that all athletic trainers are qualified and capable to provide excellent medical care to our patients. If there is no Board to oversee licensing, it will be much harder to vet athletic trainers and ensure they have been properly trained. I am concerned for the quality of patient care without a regulating body validating training and certification.

I understand there are many factors regarding the decision to de-regulate certification, but I am convinced that the deregulation will also decrease the quality of care and negative health outcomes, creating additional challenges for our communities.

Thank you for your consideration,



Confidentiality Notice: This e-mail communication and any attachments that accompany it may contain confidential, privileged, or proprietary data protected from disclosure under applicable law and is intended solely for the use of the individual(s) to whom it was intended to be addressed. If you are not the intended recipient, you are hereby notified that you have received this communication in error and that any review, disclosure, dissemination, distribution, copying, or other use or retention of it or its substance is prohibited. If you have received this communication in error, please notify me immediately by replying to this message or by telephone and deleting it from your computer. Thank you!



Comments, BCRC <bcrccomments@iowa.gov>

Athletic Training Board

1 message

Tue, Sep 12, 2023 at 11:23 PM

To: bcrccomments@iowa.gov

Having been both a EMT and Athletic Trainer I believe the recommendation to eliminate a board for a health care provider seems suspicious. May come from disinformation from physical therapists as Michigan had a similar issue years ago when PT's lied about ATC's not legally allowed to treat patients! Also know DOD Army Department funded a study through University of South Carolina embedded ATC's with training battalions and after the first year the outcomes of trainers working with troops to restore them to duty was so impressive the Army didn't bother with second year. Other branches and even police organizations also hire athletic trainers. In Canada they changed their title to Athletic Therapists in UK Sports Medicine Therapists if the athletic trainers had a title more recognizable as a healthcare professional maybe this attempt to eliminate the board and license would have been avoided. Working once with the Iowa Board of Medical Examiners I was told that license is about consumer safety and patients need to know ATC's are a regulated health care provider. Thank you for your consideration of my concern.

Sent from my iPhone



Comments, BCRC <bcrccomments@iowa.gov>

Dietitian Licensure

1 message

Wed, Sep 13, 2023 at 7:02 AM

To: "BCRCcomments@iowa.gov" <BCRCcomments@iowa.gov>

Dear Members of the Boards and Commissions Review Committee,

My name is [REDACTED] I have been a registered, licensed dietitian in both Iowa and Illinois over the past 10+ years working in a variety of places ideal for providing accurate, evidenced based nutrition guidance to those who need it most. In a time like today with social media offering an enormous amount of false information, now it is more important than ever to ensure that the people of Iowa are receiving proper nutrition education from those professionals who have committed their careers to helping individuals live their healthiest lifestyle possible, in the safest way possible.

I am sending this message in regard to the subcommittee recommendations that were issued on August 29, 2023. I am aware that within this report is a recommendation to eliminate the Iowa Board of Dietetics. As a registered and licensed dietitian nutritionist (RDN) in Iowa, this recommendation not only impacts my ability to continue my practice but also impacts **the constitutional duty of our state government to protect its citizens**. I strongly advise against the elimination of the Board of Dietetics and our licensure for the following reasons:

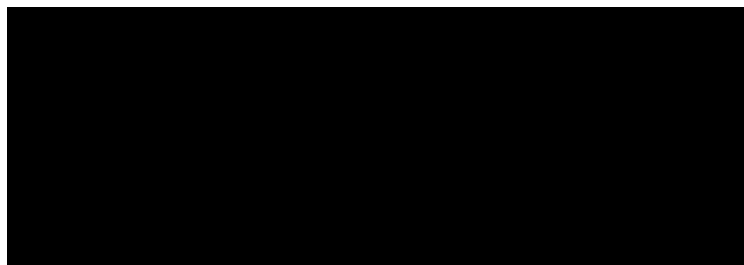
- **RDNs are specialized, highly trained healthcare professionals.** Similar to other healthcare professions with boards recommended to “continue,” RDNs must complete rigorous coursework that meets the accreditation standards within the Academy of Nutrition and Dietetics; complete a >1,000 hour supervised practicum; pass a national board examination; and take yearly continuing education.
- **RDNs are uniquely qualified to practice specialized nutrition care or Medical Nutrition Therapy.** RDNs scope of practice allows them to prescribe therapeutic diets to mitigate the effects of acute or chronic disease; to provide alternative nutrition when oral feeding is not possible or unsafe; to counsel individuals who are in need of improved nutrition; and to provide individualized nutritional guidance within the context of specific surgeries, drugs or treatments. Would you want an untrained, unlicensed professional providing that type of care for you, your child, or other loved one?
- **The Board of Dietetics protects Iowa citizens from unethical, harmful nutrition care.** The Board of Dietetics vets licensure applicants to ensure that competent, properly educated, ethically sound individuals practice as RDNs in Iowa. Applicants who have been found to be in violation of the law, derelict, impaired, or negligent in their practice, or who have engaged in practices that are not a part of the RDNs scope of practice are not granted licensure to practice in Iowa. Likewise, licensed dietitian practitioners found to be in similar violation or have not maintained continuing education requirements face sanction from this Board, with the possibility of probation or suspension of the license to practice.
- **Dietetic licensure has become THE standard requirement for employment for most of the 1100+ licensees within Iowa.** Registered Dietitians without licenses are not considered

adequately credentialed for hire with healthcare organizations in Iowa. Infringement on this Board and with Dietetic Licensure would not be conducive to job creation.

- **The livelihood of many Iowa dietitians depends on licensure-required reimbursement.** Licensure provides health insurance companies and state and federal governments with the assurance that practitioners meet standards of professional competence in order to be reimbursed for providing nutrition care services. In Iowa, medical nutrition therapy and therapeutic diets are provided by Registered AND Licensed Dietitians, and it is in Iowa law that these services MUST be provided by Registered AND Licensed Dietitians for insurance payment. This comes into play at the hospital/clinic levels, as well as long-term care facilities.
- **There is no taxpayer expense associated with the Board of Dietetics.** The fees that Licensed Dietitians pay to renew their license cover all costs incurred by the department that provides oversight. This Board has proven to be cost-effective and it operates consistently in the black each year.
- **The Board of Dietetics is efficient with its meetings.** The Board of Dietetics meets quarterly, and as needed. It has held virtual meetings for several years, when appropriate.
- **The Board of Dietetics compensates its members.** The Board of Dietetics is comprised of both professional and citizen members and these Board members are provided compensation for their service to the citizens of Iowa.
- **We need licensure in Iowa in order to be part of the interstate compact that the Academy of Nutrition and Dietetics at the national level is working toward.**

I urge this subcommittee to reconsider the recommendation to eliminate the Board of Dietetics when it provides a final report to the Governor later this month.

Thank you for your consideration in this matter.





Comments, BCRC <bcrccomments@iowa.gov>

Board of Dietetics, state licensure

1 message

Wed, Sep 13, 2023 at 9:03 AM

To: BCRCcomments@iowa.gov

Dear Members of the Boards and Commissions Review Committee,

My name is [REDACTED] I am a registered and state licensed clinical dietitian practicing in central Iowa, providing medical nutrition therapy to hospital patients. In order to obtain this position and credentials, I completed a four year Bachelor of Science in dietetics degree from Iowa State University and went on to complete a 1200+ hr supervised practice internship and Masters of Science in Dietetics Systems Leadership from Montana State University. I spent six years studying and learning to be able to call myself a Registered Dietitian and to provide the absolute best form of care for my patients. State licensure provides security for my patients, ensuring they are receiving care from Registered Dietitian, rather than a self-titled nutritionist.

I am sending this message in regard to the subcommittee recommendations that were issued on August 29, 2023. I am aware that within this report is a recommendation to eliminate the Iowa Board of Dietetics. As a registered and licensed dietitian nutritionist (RDN) in Iowa, this recommendation not only impacts my ability to continue my practice but also impacts **the constitutional duty of our state government to protect its citizens**. I strongly advise against the elimination of the Board of Dietetics and our licensure for the following reasons:

- **RDNs are specialized, highly trained healthcare professionals.** Similar to other healthcare professions with boards recommended to “continue,” RDNs must complete rigorous coursework that meets the accreditation standards within the Academy of Nutrition and Dietetics; complete a >1,000 hour supervised practicum; pass a national board examination; and take yearly continuing education.
- **RDNs are uniquely qualified to practice specialized nutrition care or Medical Nutrition Therapy.** RDNs scope of practice allows them to prescribe therapeutic diets to mitigate the effects of acute or chronic disease; to provide alternative nutrition when oral feeding is not possible or unsafe; to counsel individuals who are in need of improved nutrition; and to provide individualized nutritional guidance within the context of specific surgeries, drugs or treatments. Would you want an untrained, unlicensed professional providing that type of care for you, your child, or other loved one?
- **The Board of Dietetics protects Iowa citizens from unethical, harmful nutrition care.** The Board of Dietetics vets licensure applicants to ensure that competent, properly educated, ethically sound individuals practice as RDNs in Iowa. Applicants who have been found to be in violation of the law, derelict, impaired, or negligent in their practice, or who have engaged in practices that are not a part of the RDNs scope of practice are not granted licensure to practice in Iowa. Likewise, licensed dietitian practitioners found to be in similar violation or have not maintained continuing education requirements face sanction from this Board, with the possibility of probation or suspension of the license to practice.

- **Dietetic licensure has become THE standard requirement for employment for most of the 1100+ licensees within Iowa.** Registered Dietitians without licenses are not considered adequately credentialed for hire with healthcare organizations in Iowa. Infringement on this Board and with Dietetic Licensure would not be conducive to job creation.
- **The livelihood of many Iowa dietitians depends on licensure-required reimbursement.** Licensure provides health insurance companies and state and federal governments with the assurance that practitioners meet standards of professional competence in order to be reimbursed for providing nutrition care services. In Iowa, medical nutrition therapy and therapeutic diets are provided by Registered AND Licensed Dietitians, and it is in Iowa law that these services MUST be provided by Registered AND Licensed Dietitians for insurance payment. This comes into play at the hospital/clinic levels, as well as long-term care facilities.
- **There is no taxpayer expense associated with the Board of Dietetics.** The fees that Licensed Dietitians pay to renew their license cover all costs incurred by the department that provides oversight. This Board has proven to be cost-effective and it operates consistently in the black each year.
- **The Board of Dietetics is efficient with its meetings.** The Board of Dietetics meets quarterly, and as needed. It has held virtual meetings for several years, when appropriate.
- **The Board of Dietetics compensates its members.** The Board of Dietetics is comprised of both professional and citizen members and these Board members are provided compensation for their service to the citizens of Iowa.
- **We need licensure in Iowa in order to be part of the interstate compact that the Academy of Nutrition and Dietetics at the national level is working toward.**

I urge this subcommittee to reconsider the recommendation to eliminate the Board of Dietetics when it provides a final report to the Governor later this month.

Thank you for your consideration in this matter.





Comments, BCRC <bcrccomments@iowa.gov>

RT Licensure Board Elimination/Consoliation

1 message

[Redacted]

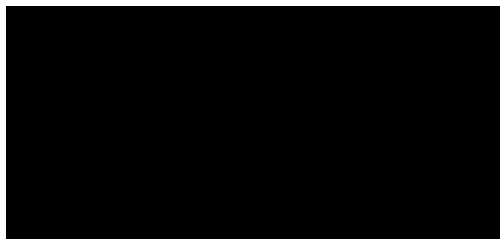
Wed, Sep 13, 2023 at 9:11 AM

To: "bcrccomments@iowa.gov" <bcrccomments@iowa.gov>

I am a Registered Respiratory Therapist at MercyOne North Iowa. In regard to consolidating the Respiratory Licensure Board, I believe it is vital for us to remain under/within a Medical Board! Our education is equal to an RN, we happen to be a specialized field of study and practice, in that we focus on the Pulmonary health of our patients. We work along side of Physicians in providing the best care for patients in the CCU, PICU, NICU, Acute hospital medical and surgical floors, OR, Cath Lab, Emergency Department, Subacute Care, Home Care, Pulmonary Rehab, and Clinic testing settings!

It is important for us to fall under the regulation of a Medical Board so that we continue to be represented by the appropriate people and maintain the high standards of practice that are expected of Iowa Respiratory Therapists!

Our COPD, Asthmatics, Nuromuscular, Cardiac, Neonate, Pediatric, and Trauma patients thank you!



Confidentiality Notice:

This e-mail, including any attachments is the property of Trinity Health and is intended for the sole use of the intended recipient(s). It may contain information that is privileged and confidential. Any unauthorized review, use, disclosure, or distribution is prohibited. If you are not the intended recipient, please delete this message, and reply to the sender regarding the error in a separate email.



Comments, BCRC <bcrccomments@iowa.gov>

Board of Dietetics and Dietetics licensure

1 message

Wed, Sep 13, 2023 at 9:54 AM

To: BCRCcomments@iowa.gov

Cc:

Dear Members of the Boards and Commissions Review Committee,

My name is [REDACTED] and I have been a Registered Dietitian in the State of Iowa for the last nine years. I completed my Bachelor's Degree in Dietetics and Master of Science Degree in Nutritional Sciences from Iowa State University in 2013. I then took the next step to becoming a Registered Dietitian when I completed a dietetic internship, which is a minimum 1,200 supervised practice hours with licensed professionals. Lastly, I passed the national examination from the Commission on Dietetic Registration, making me eligible to obtain a state license in Iowa to practice as a Registered AND Licensed Dietitian, delivering evidenced-based Medical Nutrition Therapy to my patients ever since.

I am sending this message regarding the subcommittee recommendations that were issued on August 29, 2023. I am aware that within this report is a recommendation to eliminate the Iowa Board of Dietetics. As a registered and licensed dietitian (RD) in Iowa, this recommendation not only impacts my ability to continue my practice but also impacts **the constitutional duty of our state government to protect its citizens**. I strongly advise against the elimination of the Board of Dietetics and our licensure for the following reasons:

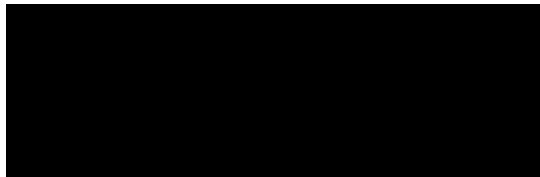
- **RDs are specialized, highly trained healthcare professionals.** Similar to other healthcare professions with boards recommended to "continue," RDs must complete rigorous coursework that meets the accreditation standards within the Academy of Nutrition and Dietetics; complete a >1,200 hour supervised practicum; pass a national board examination; and take yearly continuing education.
- **RDs are uniquely qualified to practice specialized nutrition care or Medical Nutrition Therapy.** RDs scope of practice allows them to prescribe therapeutic diets to mitigate the effects of acute or chronic disease; to provide alternative nutrition when oral feeding is not possible or unsafe; to counsel individuals who are in need of improved nutrition; and to provide individualized nutritional guidance within the context of specific surgeries, drugs or treatments. Would you want an untrained, unlicensed professional providing that type of care for you, your child, or other loved one?
- **The Board of Dietetics protects Iowa citizens from unethical, harmful nutrition care.** The Board of Dietetics vets licensure applicants to ensure that competent, properly educated, ethically sound individuals practice as RDs in Iowa. Applicants who have been found to be in violation of the law, derelict, impaired, or negligent in their practice, or who have engaged in practices that are not a part of the RDs scope of practice are not granted licensure to practice in Iowa. Likewise, licensed dietitian practitioners found to be in similar violation or have not maintained continuing education requirements face sanction from this Board, with the possibility of probation or suspension of the license to practice.
- **Dietetic licensure has become THE standard requirement for employment for most of the 1100+ licensees within Iowa.** Registered Dietitians without licenses are not considered adequately credentialed for hire with healthcare organizations in Iowa. Infringement on this Board and with Dietetic Licensure would not be conducive to job creation.
- **The livelihood of many Iowa dietitians depends on licensure-required reimbursement.** Licensure provides health insurance companies and state and federal governments with the assurance that practitioners meet standards of professional competence in order to be reimbursed for providing nutrition care services. In Iowa,

medical nutrition therapy and therapeutic diets are provided by Registered AND Licensed Dietitians, and it is in Iowa law that these services MUST be provided by Registered AND Licensed Dietitians for insurance payment. This comes into play at the hospital/clinic levels, as well as long-term care facilities.

- **There is no taxpayer expense associated with the Board of Dietetics.** The fees that Licensed Dietitians pay to renew their license cover all costs incurred by the department that provides oversight. This Board has proven to be cost-effective and it operates consistently in the black each year.
- **The Board of Dietetics is efficient with its meetings.** The Board of Dietetics meets quarterly, and as needed. It has held virtual meetings for several years, when appropriate.
- **The Board of Dietetics compensates its members.** The Board of Dietetics is comprised of both professional and citizen members and these Board members are provided compensation for their service to the citizens of Iowa.
- **We need licensure in Iowa in order to be part of the interstate compact that the Academy of Nutrition and Dietetics at the national level is working toward.**

I urge this subcommittee to reconsider the recommendation to eliminate the Board of Dietetics when it provides a final report to the Governor later this month.

Thank you for your consideration in this matter. Please reach out to me with additional questions or for further discussion.





Comments, BCRC <bcrccomments@iowa.gov>

Iowa Board of Dietetics

1 message

Wed, Sep 13, 2023 at 10:31 AM

To: BCRCcomments@iowa.gov

September 13, 2023

Dear Members of the Boards and Commissions Review Committee,

I am sending this message in regard to the subcommittee recommendations that were issued on August 29, 2023. I am aware that within this report is a recommendation to eliminate the Iowa Board of Dietetics. As a registered and licensed dietitian nutritionist (RDN) in Iowa, this recommendation not only impacts my ability to continue my practice but also impacts **the constitutional duty of our state government to protect its citizens**. I strongly advise against the elimination of the Board of Dietetics and our licensure for the following reasons:

- **RDNs are specialized, highly trained healthcare professionals.** Similar to other healthcare professions with boards recommended to “continue,” RDNs must complete rigorous coursework that meets the accreditation standards within the Academy of Nutrition and Dietetics; complete a >1,000 hour supervised practicum; pass a national board examination; and take yearly continuing education.
- **RDNs are uniquely qualified to practice specialized nutrition care or Medical Nutrition Therapy.** RDNs scope of practice allows them to prescribe therapeutic diets to mitigate the effects of acute or chronic disease; to provide alternative nutrition when oral feeding is not possible or unsafe; to counsel individuals who are in need of improved nutrition; and to provide individualized nutritional guidance within the context of specific surgeries, drugs or treatments. Would you want an untrained, unlicensed professional providing that type of care for you, your child, or other loved one?
- **The Board of Dietetics protects Iowa citizens from unethical, harmful nutrition care.** The Board of Dietetics vets licensure applicants to ensure that competent, properly educated, ethically sound individuals practice as RDNs in Iowa. Applicants who have been found to be in violation of the law, derelict, impaired, or negligent in their practice, or who have engaged in practices that are not a part of the RDNs scope of practice are not granted licensure to practice in Iowa. Likewise, licensed dietitian practitioners found to be in similar violation or have not maintained continuing education requirements face sanction from this Board, with the possibility of probation or suspension of the license to practice.
- **Dietetic licensure has become THE standard requirement for employment for most of the 1100+ licensees within Iowa.** Registered Dietitians without licenses are not considered adequately credentialed for hire with healthcare organizations in Iowa. Infringement on this Board and with Dietetic Licensure would not be conducive to job creation.
- **The livelihood of many Iowa dietitians depends on licensure-required reimbursement.** Licensure provides health insurance companies and state and federal governments with the assurance that practitioners meet standards of professional competence in order to be reimbursed for providing nutrition care services. In Iowa, medical nutrition therapy and therapeutic diets are provided by Registered AND Licensed Dietitians, and it is in Iowa law that these services MUST be provided by Registered AND Licensed

Dietitians for insurance payment. This comes into play at the hospital/clinic levels, as well as long-term care facilities.

- **There is no taxpayer expense associated with the Board of Dietetics.** The fees that Licensed Dietitians pay to renew their license cover all costs incurred by the department that provides oversight. This Board has proven to be cost-effective and it operates consistently in the black each year.
- **The Board of Dietetics is efficient with its meetings.** The Board of Dietetics meets quarterly, and as needed. It has held virtual meetings for several years, when appropriate.
- **The Board of Dietetics compensates its members.** The Board of Dietetics is comprised of both professional and citizen members and these Board members are provided compensation for their service to the citizens of Iowa.
- **We need licensure in Iowa in order to be part of the interstate compact that the Academy of Nutrition and Dietetics at the national level is working toward.**

I urge this subcommittee to reconsider the recommendation to eliminate the Board of Dietetics when it provides a final report to the Governor later this month.

Thank you for your consideration in this matter.





Comments, BCRC <bcrccomments@iowa.gov>

Action: DO NOT Eliminate Iowa Board of Dietetics

1 message

Wed, Sep 13, 2023 at 11:07 AM

To: BCRCcomments@iowa.gov

Dear Members of the Boards and Commissions Review Committee,

I am sending this message in regard to the subcommittee recommendations that were issued on August 29, 2023. I am aware that within this report is a recommendation to eliminate the Iowa Board of Dietetics. As a registered and licensed dietitian nutritionist (RDN) in Iowa, this recommendation not only impacts my ability to continue my practice but also impacts **the constitutional duty of our state government to protect its citizens**. I strongly advise against the elimination of the Board of Dietetics and our licensure for the following reasons:

- **RDNs are specialized, highly trained healthcare professionals.** Similar to other healthcare professions with boards recommended to “continue,” RDNs must complete rigorous coursework that meets the accreditation standards within the Academy of Nutrition and Dietetics; complete a >1,000 hour supervised practicum; pass a national board examination; and take yearly continuing education.
- **RDNs are uniquely qualified to practice specialized nutrition care or Medical Nutrition Therapy.** RDNs scope of practice allows them to prescribe therapeutic diets to mitigate the effects of acute or chronic disease; to provide alternative nutrition when oral feeding is not possible or unsafe; to counsel individuals who are in need of improved nutrition; and to provide individualized nutritional guidance within the context of specific surgeries, drugs or treatments. Would you want an untrained, unlicensed professional providing that type of care for you, your child, or other loved one?
- **The Board of Dietetics protects Iowa citizens from unethical, harmful nutrition care.** The Board of Dietetics vets licensure applicants to ensure that competent, properly educated, ethically sound individuals practice as RDNs in Iowa. Applicants who have been found to be in violation of the law, derelict, impaired, or negligent in their practice, or who have engaged in practices that are not a part of the RDNs scope of practice are not granted licensure to practice in Iowa. Likewise, licensed dietitian practitioners found to be in similar violation or have not maintained continuing education requirements face sanction from this Board, with the possibility of probation or suspension of the license to practice.
- **Dietetic licensure has become THE standard requirement for employment for most of the 1100+ licensees within Iowa.** Registered Dietitians without licenses are not considered adequately credentialed for hire with healthcare organizations in Iowa. Infringement on this Board and with Dietetic Licensure would not be conducive to job creation.
- **The livelihood of many Iowa dietitians depends on licensure-required reimbursement.** Licensure provides health insurance companies and state and federal governments with the assurance that practitioners meet standards of professional competence in order to be reimbursed for providing nutrition care services. In Iowa, medical nutrition therapy and therapeutic diets are provided by Registered AND Licensed Dietitians, and it is in Iowa law

that these services MUST be provided by Registered AND Licensed Dietitians for insurance payment. This comes into play at the hospital/clinic levels, as well as long-term care facilities.

- **There is no taxpayer expense associated with the Board of Dietetics.** The fees that Licensed Dietitians pay to renew their license cover all costs incurred by the department that provides oversight. This Board has proven to be cost-effective and it operates consistently in the black each year.
- **The Board of Dietetics is efficient with its meetings.** The Board of Dietetics meets quarterly, and as needed. It has held virtual meetings for several years, when appropriate.
- **The Board of Dietetics compensates its members.** The Board of Dietetics is composed of both professional and citizen members and these Board members are provided compensation for their service to the citizens of Iowa.
- **We need licensure in Iowa in order to be part of the interstate compact that the Academy of Nutrition and Dietetics at the national level is working toward.**

I urge this subcommittee to reconsider the recommendation to eliminate the Board of Dietetics when it provides a final report to the Governor later this month.

Thank you for your consideration in this matter.

[REDACTED]



Comments, BCRC <bcrccomments@iowa.gov>

Iowa ATC licensure at risk

1 message

Wed, Sep 13, 2023 at 11:23 AM

To: "bcrccomments@iowa.gov" <bcrccomments@iowa.gov>

Hello,

My name is [REDACTED] I am an athletic trainer and one of your constituents in District 48. The BCRC has proposed the elimination of the Board of Athletic Training. As a licensed healthcare provider, I am concerned about the impact of this proposal on the health and safety of the public. By eliminating AT licensure, it would allow untrained or unqualified individuals to pose as a healthcare provider. Please reach out to the committee members to maintain the Board of Athletic Training.

Removal of licensure for athletic trainers in the state of Iowa would be detrimental to the health and well-being of athletes across the state. Athletic trainers are pivotal health care providers in early intervention and prevention of injuries as well as emergency management in many different settings including sports medicine, orthopedics, and industrial athletes. Athletic trainers are now required to achieve a masters degree level of education from an accredited university and are required to pass a national standard board exam.

Athletic trainers are responsible for providing lifesaving care with a critical example during the Bills/Bengals game in January of 2023 when Danny Kellington and his team of ATC/LATs saved Damar Hamlin's life on live television.

I am happy to answer any questions, please contact me at [REDACTED]

Sincerely,
[REDACTED]



Comments, BCRC <bcrccomments@iowa.gov>

Board Consolidation

1 message

Wed, Sep 13, 2023 at 11:44 AM

[REDACTED]
To: "BCRCcomments@iowa.gov" <BCRCcomments@iowa.gov>

Please do not do anything more to the Board of Social Work. We are the largest providers of mental health services and do not need anything more or more "red tape" to hinder our much needed services. The Board of Social Work already does an excellent job of licensing, monitoring supervision, and practicing a strong code of ethics for consumer protection. Adding more layers of government or combining with agencies that have no clue as to how to provide these critical services will only cause greater pain to lowans who need mental health services. Thank you.

[REDACTED]



Comments, BCRC <bcrccomments@iowa.gov>

Protect the Board of Dietetics and Licensure

1 message

Wed, Sep 13, 2023 at 12:51 PM

To: BCRCcomments@iowa.gov

Dear Members of the Boards and Commissions Review Committee,

I am sending this message in regard to the subcommittee recommendations that were issued on August 29, 2023. I am aware that within this report is a recommendation to eliminate the Iowa Board of Dietetics. As a registered and licensed dietitian nutritionist (RDN) in Iowa, this recommendation not only impacts my ability to continue my practice but also impacts **the constitutional duty of our state government to protect its citizens**. I strongly advise against the elimination of the Board of Dietetics and our licensure for the following reasons:

- **RDNs are specialized, highly trained healthcare professionals.** Similar to other healthcare professions with boards recommended to “continue,” RDNs must complete rigorous coursework that meets the accreditation standards within the Academy of Nutrition and Dietetics; complete a >1,000 hour supervised practicum; pass a national board examination; and take yearly continuing education.
- **RDNs are uniquely qualified to practice specialized nutrition care or Medical Nutrition Therapy.** RDNs scope of practice allows them to prescribe therapeutic diets to mitigate the effects of acute or chronic disease; to provide alternative nutrition when oral feeding is not possible or unsafe; to counsel individuals who are in need of improved nutrition; and to provide individualized nutritional guidance within the context of specific surgeries, drugs or treatments. Would you want an untrained, unlicensed professional providing that type of care for you, your child, or other loved one?
- **The Board of Dietetics protects Iowa citizens from unethical, harmful nutrition care.** The Board of Dietetics vets licensure applicants to ensure that competent, properly educated, ethically sound individuals practice as RDNs in Iowa. Applicants who have been found to be in violation of the law, derelict, impaired, or negligent in their practice, or who have engaged in practices that are not a part of the RDNs scope of practice are not granted licensure to practice in Iowa. Likewise, licensed dietitian practitioners found to be in similar violation or have not maintained continuing education requirements face sanction from this Board, with the possibility of probation or suspension of the license to practice.
- **Dietetic licensure has become THE standard requirement for employment for most of the 1100+ licensees within Iowa.** Registered Dietitians without licenses are not considered adequately credentialed for hire with healthcare organizations in Iowa. Infringement on this Board and with Dietetic Licensure would not be conducive to job creation.
- **The livelihood of many Iowa dietitians depends on licensure-required reimbursement.** Licensure provides health insurance companies and state and federal governments with the assurance that practitioners meet standards of professional competence in order to be reimbursed for providing nutrition care services. In Iowa, medical nutrition therapy and therapeutic diets are provided by Registered AND Licensed Dietitians, and it is in Iowa law

that these services MUST be provided by Registered AND Licensed Dietitians for insurance payment. This comes into play at the hospital/clinic levels, as well as long-term care facilities.

- **There is no taxpayer expense associated with the Board of Dietetics.** The fees that Licensed Dietitians pay to renew their license cover all costs incurred by the department that provides oversight. This Board has proven to be cost-effective and it operates consistently in the black each year.
- **The Board of Dietetics is efficient with its meetings.** The Board of Dietetics meets quarterly, and as needed. It has held virtual meetings for several years, when appropriate.
- **The Board of Dietetics compensates its members.** The Board of Dietetics is comprised of both professional and citizen members and these Board members are provided compensation for their service to the citizens of Iowa.
- **We need licensure in Iowa in order to be part of the interstate compact that the Academy of Nutrition and Dietetics at the national level is working toward.**

I wish to expand further on cases of nutrition care provided by unlicensed providers in Iowa, and how I as an RDN was able to intervene to provide lifesaving care to patients.

1) A local nutritionist has placed several children on restricted diets which have contributed to the development of their eating disorders. With other health care providers intervening in the interest of these patients, they were able to provide appropriate referrals to myself as a licensed dietitian. I was able to provide evidence-based nutrition care to assist these patients, as part of a healthcare team of fully licensed providers, to stabilize them and support their healing with appropriate nutrition guidance.

2) Nutritionists at chiropractic offices and even health food stores have often placed patients and customers on numerous nutritional supplements, at times leading to toxicity symptoms which require swift intervention from a licensed healthcare team. As a licensed dietitian, I am the resource local medical providers look to to provide appropriate nutrition and supplement guidance so that patients understand their nutritional needs.

3) In the past year, I encountered a pediatric case that was being treated by chiropractic care, and I was consulted with as a licensed dietitian. My assessment was able to identify the acute medical needs of this child, and get her in follow-up with medical care. The child was placed on a feeding tube due to her medical and nutritional instability. Without the intervention of a licensed dietitian, other unqualified providers caused harm that could have led to the death of this child.

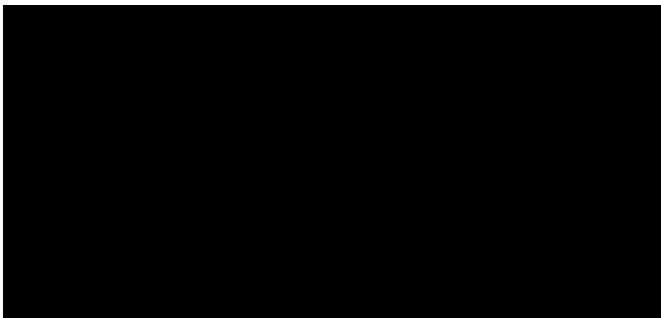
Without licensure and limitations on who can provide nutrition care, more unqualified providers will step up to provide care, risking harm to the wellbeing of Iowans.

I urge this subcommittee to reconsider the recommendation to eliminate the Board of Dietetics when it provides a final report to the Governor later this month.

Thank you for your consideration in this matter.

Michelle

--





CONFIDENTIALITY STATEMENT: This email may contain confidential health information that is legally privileged. This information is intended only for the use of the individual or entity named above. The authorized recipient of this information is prohibited from disclosing this information to any other party unless required to do so by law or regulation and is required to destroy the information after its stated need has been fulfilled. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, or action taken in reliance on the contents of these documents is strictly prohibited. If you have received this information in error, please notify the sender immediately and arrange for the return or destruction of these documents.

Please be aware that e-mail is not a confidential form of transmitting information. If you have confidential information that you need to share please schedule an appointment. Sharing confidential information via e-mail is at your own risk.



Comments, BCRC <bcrccomments@iowa.gov>

RDN Credential

1 message

Wed, Sep 13, 2023 at 2:06 PM

To: BCRCcomments@iowa.gov

Dear Members of the Boards and Commissions Review Committee,

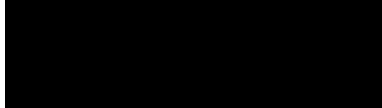
I am sending this message in regard to the subcommittee recommendations that were issued on August 29, 2023. I am aware that within this report is a recommendation to eliminate the Iowa Board of Dietetics. As a registered and licensed dietitian nutritionist (RDN) in Iowa, this recommendation not only impacts my ability to continue my practice but also impacts **the constitutional duty of our state government to protect its citizens**. I strongly advise against the elimination of the Board of Dietetics and our licensure for the following reasons:

- **RDNs are specialized, highly trained healthcare professionals.** Similar to other healthcare professions with boards recommended to “continue,” RDNs must complete rigorous coursework that meets the accreditation standards within the Academy of Nutrition and Dietetics; complete a >1,000 hour supervised practicum; pass a national board examination; and take yearly continuing education.
- **RDNs are uniquely qualified to practice specialized nutrition care or Medical Nutrition Therapy.** RDNs scope of practice allows them to prescribe therapeutic diets to mitigate the effects of acute or chronic disease; to provide alternative nutrition when oral feeding is not possible or unsafe; to counsel individuals who are in need of improved nutrition; and to provide individualized nutritional guidance within the context of specific surgeries, drugs or treatments. Would you want an untrained, unlicensed professional providing that type of care for you, your child, or other loved one?
- **The Board of Dietetics protects Iowa citizens from unethical, harmful nutrition care.** The Board of Dietetics vets licensure applicants to ensure that competent, properly educated, ethically sound individuals practice as RDNs in Iowa. Applicants who have been found to be in violation of the law, derelict, impaired, or negligent in their practice, or who have engaged in practices that are not a part of the RDNs scope of practice are not granted licensure to practice in Iowa. Likewise, licensed dietitian practitioners found to be in similar violation or have not maintained continuing education requirements face sanction from this Board, with the possibility of probation or suspension of the license to practice.
- **Dietetic licensure has become THE standard requirement for employment for most of the 1100+ licensees within Iowa.** Registered Dietitians without licenses are not considered adequately credentialed for hire with healthcare organizations in Iowa. Infringement on this Board and with Dietetic Licensure would not be conducive to job creation.
- **The livelihood of many Iowa dietitians depends on licensure-required reimbursement.** Licensure provides health insurance companies and state and federal governments with the assurance that practitioners meet standards of professional competence in order to be reimbursed for providing nutrition care services. In Iowa, medical nutrition therapy and therapeutic diets are provided by Registered AND Licensed Dietitians, and it is in Iowa law that these services MUST be provided by Registered AND Licensed Dietitians for insurance payment. This comes into play at the hospital/clinic levels, as well as long-term care facilities.
- **There is no taxpayer expense associated with the Board of Dietetics.** The fees that Licensed Dietitians pay to renew their license cover all costs incurred by the department that provides oversight. This Board has proven to be cost-effective and it operates consistently in the black each year.
- **The Board of Dietetics is efficient with its meetings.** The Board of Dietetics meets quarterly, and as needed. It has held virtual meetings for several years, when appropriate.

- **The Board of Dietetics compensates its members.** The Board of Dietetics is comprised of both professional and citizen members and these Board members are provided compensation for their service to the citizens of Iowa.
- **We need licensure in Iowa in order to be part of the interstate compact that the Academy of Nutrition and Dietetics at the national level is working toward.**

I urge this subcommittee to reconsider the recommendation to eliminate the Board of Dietetics when it provides a final report to the Governor later this month.

Thank you for your consideration in this matter





Comments, BCRC <bcrccomments@iowa.gov>

Respiratory Care Board Merge Concerns

1 message

Wed, Sep 13, 2023 at 2:27 PM

To: "bcrccomments@iowa.gov" <bcrccomments@iowa.gov>

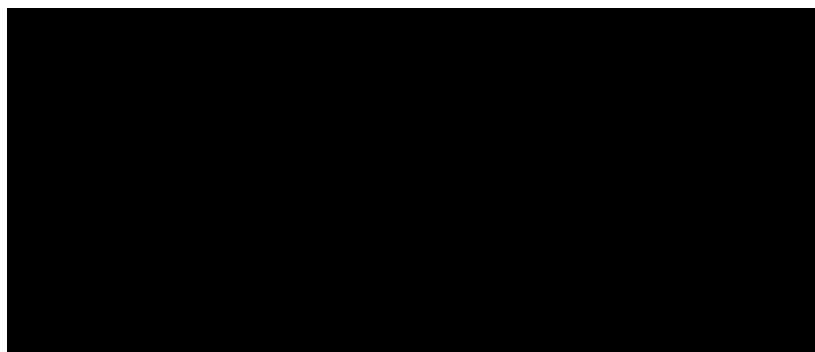
Hello,

My name is [REDACTED] I am the district 2 Director for the Iowa Society for Respiratory Care. I represent the respiratory therapy profession in my district that includes Story County, Grundy County, Boone County and Marshall County to name a few. I am also the Respiratory Care Manager at Mary Greeley Medical Center. I have been a respiratory therapist for 17 years. I am voicing concern about the merging of the Respiratory Therapy and Polysomnography licensure board. Respiratory therapists care for individuals that have difficulty breathing. Our profession was instrumental during the Covid pandemic to care for the incredibly sick patients suffering from the effects of Covid-19. We also are the ones caring for the patient population who test positive for influenza, RSV plus many other severe respiratory illnesses. We work under the direction of physicians. For the safety of patients, it is important that we are joined with healthcare professionals that serve like patients.

If this merge occurs, we need a voice on the merged board to continue to assess competency for those practicing respiratory therapy and provide safe and effective respiratory care. We currently have 4 seats on our board, and we need to maintain this voice in a similar ratio. Given the possible list of medical boards, it seems fitting that we would fall under the board of medicine. Physicians are familiar with respiratory care, and we work in similar environments. Recruitment into this field has declined exponentially since the Covid pandemic. I feel that less representation in our field will put Iowans at risk with less oversight.

If consolidation/merge is what is needed, I strongly urge you to maintain the voice of Respiratory Therapists on a newly merged board. I would suggest merging us in with the board of medicine.

Thank you for your time.





The information contained in this message may be privileged and confidential and protected from disclosure. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by replying to the message and deleting it from your computer. Thank you. Mary Greeley Medical Center



Comments, BCRC <bcrccomments@iowa.gov>

Concerning

1 message

Wed, Sep 13, 2023 at 2:29 PM

To: "bcrccomments@iowa.gov" <bcrccomments@iowa.gov>

"My name is [REDACTED] I am the Iowa Society for Respiratory Care President and I represent the respiratory therapy profession in the state of Iowa. I am voicing concern about the merging of the Respiratory Therapy and Polysomnography licensure board. Respiratory therapists care for individuals that have trouble breathing such as traumas, premature birth, critical illnesses, COPD and asthma to name a few. We have been vital in the care and treatment of individuals with COVID-19 and RSV. We work under the direction of physicians. For the safety of patients, it is important that we join healthcare professionals that serve like patients.

When the merger occurs, we need a voice on the merged board to continue to assess competency for those practicing respiratory therapy and provide safe and effective respiratory care. We currently have 4 seats on the board, and we need to maintain these voices in a similar ratio. Given the possible list of medical boards, it seems fitting that we would fall under the board of medicine. Physicians are familiar with respiratory care, and we work in similar environments.

If consolidation/merge is what is needed, I strongly urge you to maintain the voice of Respiratory Therapy on a newly merged board, suggesting the board of medicine."



Comments, BCRC <bcrccomments@iowa.gov>

APCIA Comments Opposing Elimination of Iowa's Boiler and Pressure Vessel Board

1 message

Wed, Sep 13, 2023 at 2:30 PM

To: "BCRCcomments@iowa.gov" <BCRCcomments@iowa.gov>

Cc: "Kibbe, Scot" <scot.kibbe@apci.org>

Dear Sir or Madam:

I am writing on behalf of the American Property Casualty Insurance Association (APCIA), whose member companies write more than 80% of the boiler and machinery insurance in Iowa and nationwide, and who conduct the vast majority of boiler and pressure vessel inspections on behalf of all U.S. jurisdictions.

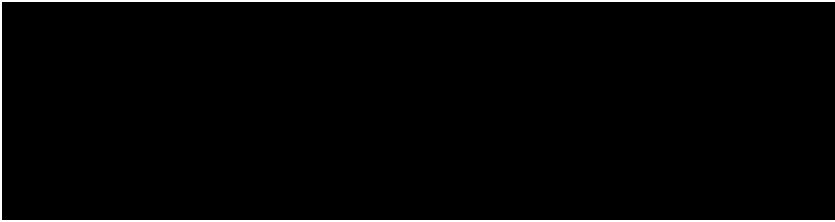
APCIA strongly objects to the proposed elimination of Iowa's Boiler and Pressure Vessel Board, a statutorily created entity comprised of a broad array of stakeholders with the necessary technical expertise to carry out the critical public safety mandate of "formulating definitions and rules requirements for the safe and proper installation, repair, maintenance, alteration, use, and operation of boilers and pressure vessels in this state."

Pursuant to I.C.A. § 89.14, the Boiler and Pressure Vessel Board is comprised of representatives of boiler insurance companies, steamfitters, boilermakers, mechanical engineers, boiler and pressure vessel manufacturers and distributors, and the Director of the Department of Inspections, Appeals, and Licensing or his or her designee. This is a diverse group that facilitates consideration of many well-informed perspectives on boiler and pressure vessel safety.

The proposed elimination of Iowa's Boiler and Pressure Vessel Board is not merely an academic concern, as this is a very active group that meets at least quarterly and regularly considers important business bearing upon public safety, including hearing appeals of inspection reports and considering requests for variances. The technical expertise and sound guidance of these stakeholders helps guard against catastrophic failures of boilers and pressure vessels that can cause significant injuries, loss of life, and destruction of property.

Accordingly, APCIA strongly recommends that Iowa retain its Boiler and Pressure Vessel Board, in order to remain in the strong majority of states that maintain similar entities in the interests of public safety. Please let me know if you have any questions about these comments.

Sincerely,



NOTICE: This electronic communication (including attachments) may contain information which is confidential and/or privileged. This information is intended solely for the individual or entity named above. If you are not the intended recipient, please notify the sender immediately upon your receipt of this transmission, delete it, and be aware that any disclosure, copying, distribution, or use of the contents of this transmission is strictly prohibited.



Comments, BCRC <bcrccomments@iowa.gov>

Concern

1 message

Wed, Sep 13, 2023 at 2:32 PM

To: bcrccomments@iowa.gov

"My name is [REDACTED] I am the Iowa Society for Respiratory Care President and I represent the respiratory therapy profession in the state of Iowa. I am voicing concern about the merging of the Respiratory Therapy and Polysomnography licensure board. Respiratory therapists care for individuals that have trouble breathing such as traumas, premature birth, critical illnesses, COPD and asthma to name a few. We have been vital in the care and treatment of individuals with COVID-19 and RSV. We work under the direction of physicians. For the safety of patients, it is important that we join healthcare professionals that serve like patients.

When the merger occurs, we need a voice on the merged board to continue to assess competency for those practicing respiratory therapy and provide safe and effective respiratory care. We currently have 4 seats on the board, and we need to maintain these voices in a similar ratio. Given the possible list of medical boards, it seems fitting that we would fall under the board of medicine. Physicians are familiar with respiratory care, and we work in similar environments.

If consolidation/merge is what is needed, I strongly urge you to maintain the voice of Respiratory Therapy on a newly merged board, suggesting the board of medicine."



Comments, BCRC <bcrccomments@iowa.gov>

Do not eliminate Board of Dietetics and Licensure

1 message

Wed, Sep 13, 2023 at 2:33 PM

To: "bcrccomments@iowa.gov" <bcrccomments@iowa.gov>

Dear Members of the Boards and Commissions Review Committee,

I am sending this message in regard to the subcommittee recommendations that were issued on August 29, 2023. I am aware that within this report is a recommendation to eliminate the Iowa Board of Dietetics. As a registered and licensed dietitian nutritionist (RDN) in Iowa, this recommendation not only impacts my ability to continue my practice but also impacts **the constitutional duty of our state government to protect its citizens**. I strongly advise against the elimination of the Board of Dietetics and our licensure for the following reasons:

- **RDNs are specialized, highly trained healthcare professionals.** Similar to other healthcare professions with boards recommended to "continue," RDNs must complete rigorous coursework that meets the accreditation standards within the Academy of Nutrition and Dietetics; complete a >1,000 hour supervised practicum; pass a national board examination; and take yearly continuing education.
- **RDNs are uniquely qualified to practice specialized nutrition care or Medical Nutrition Therapy.** RDNs scope of practice allows them to prescribe therapeutic diets to mitigate the effects of acute or chronic disease; to provide alternative nutrition when oral feeding is not possible or unsafe; to counsel individuals who are in need of improved nutrition; and to provide individualized nutritional guidance within the context of specific surgeries, drugs or treatments. Would you want an untrained, unlicensed professional providing that type of care for you, your child, or other loved one?
- **The Board of Dietetics protects Iowa citizens from unethical, harmful nutrition care.** The Board of Dietetics vets licensure applicants to ensure that competent, properly educated, ethically sound individuals practice as RDNs in Iowa. Applicants who have been found to be in violation of the law, derelict, impaired, or negligent in their practice, or who have engaged in practices that are not a part of the RDNs scope of practice are not granted licensure to practice in Iowa. Likewise, licensed dietitian practitioners found to be in similar violation or have not maintained continuing education requirements face sanction from this Board, with the possibility of probation or suspension of the license to practice.
- **Dietetic licensure has become THE standard requirement for employment for most of the 1100+ licensees within Iowa.** Registered Dietitians without licenses are not considered adequately credentialed for hire with healthcare organizations in Iowa. Infringement on this Board and with Dietetic Licensure would not be conducive to job creation.
- **The livelihood of many Iowa dietitians depends on licensure-required reimbursement.** Licensure provides health insurance companies and state and federal governments with the assurance that practitioners meet standards of professional competence in order to be reimbursed for providing nutrition care services. In Iowa, medical nutrition therapy and therapeutic diets are provided by Registered AND Licensed Dietitians, and it is in Iowa law that these services MUST be provided by Registered AND Licensed Dietitians for insurance payment. This comes into play at the hospital/clinic levels, as well as long-term care facilities.
- **There is no taxpayer expense associated with the Board of Dietetics.** The fees that Licensed Dietitians pay to renew their license cover all costs incurred by the department that provides oversight. This Board has proven to be cost-effective and it operates consistently in the black each year.
- **The Board of Dietetics is efficient with its meetings.** The Board of Dietetics meets quarterly, and as needed. It has held virtual meetings for several years, when appropriate.

- **The Board of Dietetics compensates its members.** The Board of Dietetics is comprised of both professional and citizen members and these Board members are provided compensation for their service to the citizens of Iowa.
- **We need licensure in Iowa in order to be part of the interstate compact that the Academy of Nutrition and Dietetics at the national level is working toward.**

I urge this subcommittee to reconsider the recommendation to eliminate the Board of Dietetics when it provides a final report to the Governor later this month.

Thank you for your consideration in this matter.

This message and accompanying documents are covered by the Electronic Communications Privacy Act, 18 U.S.C. sections 2510-2521, and contain information intended for the specified individual(s) only. This information is confidential. If you are not the intended recipient or an agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error and that any review, dissemination, copying, or the taking of any action based on the contents of this information is strictly prohibited. If you have received this communication in error, please notify us immediately by e-mail, and delete the original message.



Comments, BCRC <bcrccomments@iowa.gov>

Licensure mergers

1 message

Wed, Sep 13, 2023 at 3:04 PM

To: "bcrccomments@iowa.gov" <bcrccomments@iowa.gov>

Good afternoon,

I am writing in response to the recommended consolidation/merger of the Board of Respiratory Care and Polysomnography- BCID 49. Authority (2023) 147.12-.24

As members of the health professions, please take into consideration the placement of this board with like healthcare boards. Respiratory therapists take care of patients who struggle with breathing. We are in the delivery room when a baby is born with difficulties breathing and help to resuscitate that baby, provide ventilator support, and provide continued care in the neonatal intensive care unit. We take care of pediatric patients with RSV and asthma; providing necessary oxygen and breathing treatments. We help to manage ventilators on those children who have surgery to correct congenital heart defects or overdose on medicine. In the adult population, we provide care to patients with COPD. We provide non-invasive ventilation (such as CPAP or Bilevel) to neuromuscular patients or those with sleep apnea. For those who go into respiratory failure, we are at the ready to provide ventilation via mechanical ventilators. We have been vital in the care of Covid-19 patients.

With that in mind, I urge you to consolidate this board with other healthcare boards, and continue to provide adequate representation of the field of Respiratory Care and Polysomnography on those boards. We NEED A VOICE on these boards so we can continue to advocate for our patients' safety.

Thank you.

[Redacted signature]

This message and accompanying documents are covered by the Electronic Communications Privacy Act, 18 U.S.C. sections 2510-2521, and contain information intended for the specified individual(s) only. This information is confidential. If you are not the intended recipient or an agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error and that any review, dissemination, copying, or the taking of any action based on the contents of this information is strictly prohibited. If you have received this communication in error, please notify us immediately by e-mail, and delete the original message.



Comments, BCRC <bcrccomments@iowa.gov>

Consolidation of Boards and Commissions

1 message

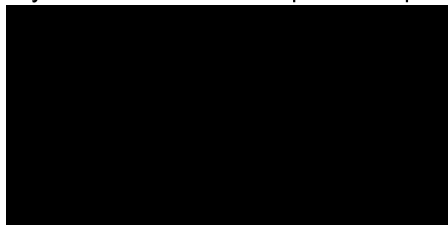
Wed, Sep 13, 2023 at 3:31 PM

[REDACTED]
To: BCRCcomments@iowa.gov

CBRC-

As a LISW (LICENSED INDEPENDENT SOCIAL WORKER) in the State of Iowa since 1996, I OPPOSE the consolidation of the Boards and Commission for the Iowa Board of Social Work. I have served the mental health needs of various clients in Iowa and this complicates and greatly affects my ability to practice and more so the needs of clients in Iowa.

If you need further examples or explanations please contact me at [REDACTED] at





Comments, BCRC <bcrccomments@iowa.gov>

Iowa Board of Dietetics

1 message

Wed, Sep 13, 2023 at 4:03 PM

To: "BCRCcomments@iowa.gov" <BCRCcomments@iowa.gov>

Dear Members of the Boards and Commissions Review Committee,

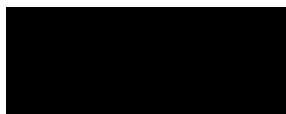
I am sending this message in regard to the subcommittee recommendations that were issued on August 29, 2023. I am aware that within this report is a recommendation to eliminate the Iowa Board of Dietetics. This recommendation not only impacts the ability of licensed dietitians to continue their practice but also impacts **the constitutional duty of our state government to protect its citizens**. I strongly advise against the elimination of the Board of Dietetics and our licensure for the following reasons:

- **RDNs are specialized, highly trained healthcare professionals.** Similar to other healthcare professions with boards recommended to "continue," RDNs must complete rigorous coursework that meets the accreditation standards within the Academy of Nutrition and Dietetics; complete a >1,000 hour supervised practicum; pass a national board examination; and take yearly continuing education.
- **RDNs are uniquely qualified to practice specialized nutrition care or Medical Nutrition Therapy.** RDNs scope of practice allows them to prescribe therapeutic diets to mitigate the effects of acute or chronic disease; to provide alternative nutrition when oral feeding is not possible or unsafe; to counsel individuals who are in need of improved nutrition; and to provide individualized nutritional guidance within the context of specific surgeries, drugs or treatments. Would you want an untrained, unlicensed professional providing that type of care for you, your child, or other loved one?
- **The Board of Dietetics protects Iowa citizens from unethical, harmful nutrition care.** The Board of Dietetics vets licensure applicants to ensure that competent, properly educated, ethically sound individuals practice as RDNs in Iowa. Applicants who have been found to be in violation of the law, derelict, impaired, or negligent in their practice, or who have engaged in practices that are not a part of the RDNs scope of practice are not granted licensure to practice in Iowa. Likewise, licensed dietitian practitioners found to be in similar violation or have not maintained continuing education requirements face sanction from this Board, with the possibility of probation or suspension of the license to practice.
- **Dietetic licensure has become THE standard requirement for employment for most of the 1100+ licensees within Iowa.** Registered Dietitians without licenses are not considered adequately credentialed for hire with healthcare organizations in Iowa. Infringement on this Board and with Dietetic Licensure would not be conducive to job creation.
- **The livelihood of many Iowa dietitians depends on licensure-required reimbursement.** Licensure provides health insurance companies and state and federal governments with the assurance that practitioners meet standards of professional competence in order to be reimbursed for providing nutrition care services. In Iowa, medical nutrition therapy and therapeutic diets are provided by Registered AND Licensed Dietitians, and it is in Iowa law that these services MUST be provided by Registered AND Licensed Dietitians for insurance payment. This comes into play at the hospital/clinic levels, as well as long-term care facilities.
- **There is no taxpayer expense associated with the Board of Dietetics.** The fees that Licensed Dietitians pay to renew their license cover all costs incurred by the department that provides oversight. This Board has proven to be cost-effective and it operates consistently in the black each year.
- **The Board of Dietetics is efficient with its meetings.** The Board of Dietetics meets quarterly, and as needed. It has held virtual meetings for several years, when appropriate.

- **The Board of Dietetics compensates its members.** The Board of Dietetics is comprised of both professional and citizen members and these Board members are provided compensation for their service to the citizens of Iowa.
- **We need licensure in Iowa in order to be part of the interstate compact that the Academy of Nutrition and Dietetics at the national level is working toward.**

I urge this subcommittee to reconsider the recommendation to eliminate the Board of Dietetics when it provides a final report to the Governor later this month.

Thank you for your consideration in this matter.



Sent from [Mail](#) for Windows



Virus-free.www.avg.com



Comments, BCRC <bcrccomments@iowa.gov>

Elimination of the State's Building Code Advisory Council and the State Building Code Board of Review.

1 message

[REDACTED]
To: BCRCComments@iowa.gov

Wed, Sep 13, 2023 at 4:29 PM

I have become aware the Iowa Board and Review Committee is considering the elimination of the State's Building Code Advisory Council and the State Building Code Board of Review, along with many other Boards and Commissions. I believe this is a mistake. These Boards and Commissions follow the latest trends in the building technology and practices. By combining these boards with others, will dilute the ability of the boards to keep current. There are many new trends coming, including clean energy options, construction materials, building practices. We need to remain on the cutting edge of technology in order to keep Iowa a safe and comfortable place to live. PLEASE REJECT THIS RECOMMENDATION.





Comments, BCRC <bcrccomments@iowa.gov>

Licensure Board: Sign Language Interpreters & Transliterators

1 message

Wed, Sep 13, 2023 at 8:37 PM

[REDACTED]
to: BCRCComments@iowa.gov

Dear Board and Commission Review Committee members,

The Licensure Board for Sign Language Interpreters & Transliterators has been marked as “restructured” in the initial draft recommendations from your Committee. While we are unsure of what this recommendation or restructure would include, we would like to request that any change not dilute the effectiveness of the Board, nor the inclusion of both professional interpreters and Deaf community members from sitting on the Board.

Licensure of Sign Language Interpreters & Transliterators is critical because of the unique dynamics in which interpreters are hired. In almost all cases, the people who are responsible for hiring sign language interpreters are not fluent in sign language, and are not qualified to assess or determine whether or not an interpreter is competent or qualified for the specific setting. A school principal, county court clerk, or medical office receptionist are often the person in charge of hiring a sign language interpreter to provide communication access for a Deaf student, client, or patient, but have no knowledge of the credentials required to be a proficient and ethical practitioner of interpreting. Additionally, they are often not even participants in the meeting or appointment for which the interpreter is hired. The Deaf person also does not know who the interpreter is that will be providing their access to education, legal proceedings, or healthcare information until they have arrived at their appointment, at which point there is very little they can do to get a different interpreter.

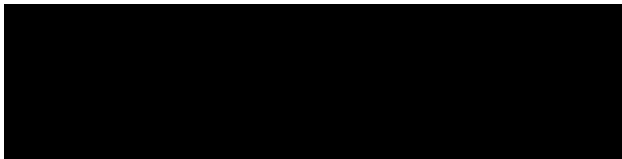
There is currently a national shortage of sign language interpreters. Increasing demand along with a federal requirement to provide accommodations under the Americans with Disabilities Act, plus the dynamics outlined above, creates an environment that encourages entities to hire interpreters without verifying or ensuring that they are qualified. However, the ADA requires that interpreters are “able to interpret effectively, accurately and impartially, both receptively and expressively, using any necessary specialized vocabulary.” Therefore, the provision of an unqualified interpreter is a violation of the ADA and puts Iowa’s entities at risk for lawsuits. How can we make sure that interpreters are meeting ADA requirements for being qualified? Licensure is a way to accomplish this and protect Iowa businesses.

Interpreters also often work as independent contractors, not as employees of a larger company. When businesses need interpreting services, they are trusting that the people they contract with have the qualifications to do the work; however, they typically have no way of verifying this. Deaf people who experience unqualified interpreters may suffer greatly with little recourse. Imagine that you or a loved one relied on an interpreter to relay the correct way to take your medication, and that your doctor had no way to know whether or not the correct dosage was relayed to you. Imagine that you rely on an interpreter for your mental health counseling, or your meetings with your financial advisor. How can you feel comfortable that your information will remain confidential? How can we make sure that interpreters are qualified to do the work accurately and ethically? Licensure is a way to accomplish this and protect Iowa’s Deaf children and adults.

Licensure gives Iowa's citizens a mechanism to verify that the interpreters who are serving them are qualified, and provides a route for remediation via the complaints process when interpreters are not qualified or ethical in their work. It's also important to ensure that both professional interpreters and Deaf community members serve on the Licensure Board to ensure that the perspectives of both the practitioner and the community they serve are equally represented. For these reasons, we ask that any restructuring of the Licensure Board for Sign Language Interpreters and Transliterators does not dilute the effectiveness of the Board, nor the inclusion of both professional interpreters and Deaf community members from sitting on the Board.

We are available to answer any questions you may have regarding the profession of interpreting or licensure of interpreters.

Thank you,





Board of Dietetics - Boards and Commissions Review Committee Recommendations

1 message

Wed, Sep 13, 2023 at 9:03 PM

To: BCRCcomments@iowa.gov

Dear Members of the Boards and Commissions Review Committee,

My name is [REDACTED] and I am a Registered Dietitian Nutritionist (RDN) and Licensed Dietitian from Ames, Iowa. I have practiced as a dietitian for over 11 years and have provided medical nutrition therapy, specialized nutrition care that RDNs are uniquely trained and qualified to provide, for both children and adults. Now as an educator, I help train students in Iowa who are studying to be dietitians.

I am sending this message in regard to the subcommittee recommendations that were issued on August 29, 2023. I am aware that within this report is a recommendation to eliminate the Iowa Board of Dietetics. As registered and licensed dietitians in Iowa, this recommendation not only impacts our ability to continue to practice but also impacts **the constitutional duty of our state government to protect its citizens.**

I strongly advise against the elimination of the Board of Dietetics and our licensure for the following reasons:

- **RDNs are specialized, highly trained healthcare professionals.** Similar to other healthcare professions with boards recommended to “continue,” RDNs must complete rigorous coursework that meets the accreditation standards within the Academy of Nutrition and Dietetics; complete a >1,000 hour supervised practicum; pass a national board examination; and take yearly continuing education.
- **RDNs are uniquely qualified to practice specialized nutrition care or Medical Nutrition Therapy.** RDNs scope of practice allows them to prescribe therapeutic diets to mitigate the effects of acute or chronic disease; to provide alternative nutrition when oral feeding is not possible or unsafe; to counsel individuals who are in need of improved nutrition; and to provide individualized nutritional guidance within the context of specific surgeries, drugs or treatments. Would you want an untrained, unlicensed professional providing that type of care for you, your child, or other loved one?
- **The Board of Dietetics protects Iowa citizens from unethical, harmful nutrition care.** The Board of Dietetics vets licensure applicants to ensure that competent, properly educated, ethically sound individuals practice as RDNs in Iowa. Applicants who have been found to be in violation of the law, derelict, impaired, or negligent in their practice, or who have engaged in practices that are not a part of the RDNs scope of practice are not granted licensure to practice in Iowa. Likewise, licensed dietitian practitioners found to be in similar violation or have not maintained continuing education requirements face sanction from this Board, with the possibility of probation or suspension of the license to practice.
- **Dietetic licensure has become THE standard requirement for employment for most of the 1100+ licensees within Iowa.** Registered Dietitians without licenses are not considered adequately credentialed for hire with healthcare organizations in Iowa. Infringement on this Board and with Dietetic Licensure would not be conducive to job creation.
- **The livelihood of many Iowa dietitians depends on licensure-required reimbursement.** Licensure provides health insurance companies and state and federal governments with the assurance that practitioners meet standards of professional competence in order to be reimbursed for providing nutrition care services. In Iowa, medical nutrition therapy and therapeutic diets are provided by Registered AND Licensed Dietitians, and it is in Iowa law that these services MUST be provided by

Registered AND Licensed Dietitians for insurance payment. This comes into play at the hospital/clinic levels, as well as long-term care facilities.

- **There is no taxpayer expense associated with the Board of Dietetics.** The fees that Licensed Dietitians pay to renew their license cover all costs incurred by the department that provides oversight. This Board has proven to be cost-effective and it operates consistently in the black each year.
- **The Board of Dietetics is efficient with its meetings.** The Board of Dietetics meets quarterly, and as needed. It has held virtual meetings for several years, when appropriate.
- **The Board of Dietetics compensates its members.** The Board of Dietetics is comprised of both professional and citizen members and these Board members are provided compensation for their service to the citizens of Iowa.
- **We need licensure in Iowa in order to be part of the interstate compact that the Academy of Nutrition and Dietetics at the national level is working toward.**

I urge this subcommittee to reconsider the recommendation to eliminate the Board of Dietetics when it provides a final report to the Governor later this month.

Thank you,





Comments, BCRC <bcrccomments@iowa.gov>

Red Tape Review - Athletic Trainer

1 message

Wed, Sep 13, 2023 at 9:19 PM

[Redacted]
to: bcrccomments@iowa.gov <bcrccomments@iowa.gov>

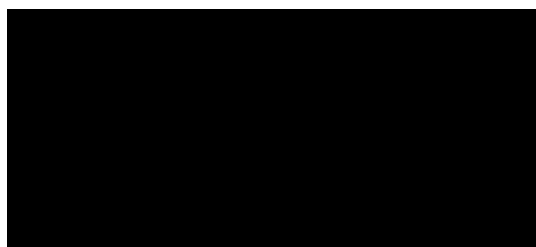
To whom it may concern:

Across this country states regulate professions to protect the public from harm by unqualified practitioners. Currently, 49 states regulate athletic trainers (ATs). Without such regulation there is no legal way to assure quality health care to athletes because there is no legal definition as to what an AT can and cannot do. This lack of legal definitions has caused many problems in California where ATs are not currently regulated. Without regulation, de facto legal support is given to high schools and other institutions to use less qualified persons to care for student-athletes. These student-athletes may suffer as untrained and/or unqualified persons are allowed to act in the stead of a highly-educated and highly-qualified health care professional (the AT).

Iowa has been a leader in AT education and AT practice for decades. Please listen to the ATs from Iowa as they lay out their arguments for retaining regulation in Iowa. To remove the requirement for licensing would be a step backward for sports medicine in Iowa. It would also present an unintended consequence of stifling the development of small businesses designed to advance health care for athletes.

The role of the regulatory board is much to important to allow it to be eliminated. Protect athletes in Iowa by maintaining requirement for licensure

The Iowa Board of Athletic Training evaluates the qualifications of applicants for licensure and grants licenses to those who qualify. The Board establishes rules and regulations to ensure the integrity and competence of licensed athletic trainers and investigates complaints for unprofessional conduct. The Board is the link between the consumer and the licensed athletic trainer, as such, promotes the public health, welfare and safety.



9/13/2023

Dear Members of the Boards and Commissions Review Committee,

My name is [REDACTED] I have been a Registered Dietitian Nutritionist for 5 years, and I am currently the Director of Sports Nutrition at the University of Iowa, and a PRN clinical inpatient dietitian at Mercy Medical Center in Cedar Rapids, Iowa. I worked as full-time clinical inpatient dietitian at Mercy for two and a half years after passing my registration exam and getting licensed, before transitioning to a full-time role with University of Iowa Sports Nutrition. I have a Bachelor of Science in Dietetics and am currently pursuing a Master of Professional Practice in Dietetics from Iowa State University.

I am sending this message in regard to the subcommittee recommendations that were issued on August 29, 2023. I am aware that within this report is a recommendation to eliminate the Iowa Board of Dietetics. As a registered and licensed dietitian nutritionist (RDN) in Iowa, this recommendation not only impacts my ability to continue my practice but also impacts **the constitutional duty of our state government to protect its citizens**. I strongly advise against the elimination of the Board of Dietetics and our licensure for the following reasons:

- **RDNs are specialized, highly trained healthcare professionals.** Similar to other healthcare professions with boards recommended to “continue,” RDNs must complete rigorous coursework that meets the accreditation standards within the Academy of Nutrition and Dietetics; complete a >1,000 hour supervised practicum; pass a national board examination; and take yearly continuing education.
- **RDNs are uniquely qualified to practice specialized nutrition care or Medical Nutrition Therapy.** RDNs scope of practice allows them to prescribe therapeutic diets to mitigate the effects of acute or chronic disease; to provide alternative nutrition when oral feeding is not possible or unsafe; to counsel individuals who are in need of improved nutrition; and to provide individualized nutritional guidance within the context of specific surgeries, drugs or treatments. Would you want an untrained, unlicensed professional providing that type of care for you, your child, or other loved one?
- **The Board of Dietetics protects Iowa citizens from unethical, harmful nutrition care.** The Board of Dietetics vets licensure applicants to ensure that competent, properly educated, ethically sound individuals practice as RDNs in Iowa. Applicants who have been found to be in violation of the law, derelict, impaired, or negligent in their practice, or who have engaged in practices that are not a part of the RDNs scope of practice are not granted licensure to practice in Iowa. Likewise, licensed dietitian practitioners found to be in similar violation or have not maintained continuing education requirements face sanction from this Board, with the possibility of probation or suspension of the license to practice.
- **Dietetic licensure has become THE standard requirement for employment for most of the 1100+ licensees within Iowa.** Registered Dietitians without licenses are not considered adequately credentialed for hire with healthcare organizations in Iowa. Infringement on this Board and with Dietetic Licensure would not be conducive to job creation.
- **The livelihood of many Iowa dietitians depends on licensure-required reimbursement.** Licensure provides health insurance companies and state and federal governments with the assurance that practitioners meet standards of professional competence in order to be reimbursed for providing nutrition care

services. In Iowa, medical nutrition therapy and therapeutic diets are provided by Registered AND Licensed Dietitians, and it is in Iowa law that these services MUST be provided by Registered AND Licensed Dietitians for insurance payment. This comes into play at the hospital/clinic levels, as well as long-term care facilities.

- **There is no taxpayer expense associated with the Board of Dietetics.** The fees that Licensed Dietitians pay to renew their license cover all costs incurred by the department that provides oversight. This Board has proven to be cost-effective and it operates consistently in the black each year.
- **The Board of Dietetics is efficient with its meetings.** The Board of Dietetics meets quarterly, and as needed. It has held virtual meetings for several years, when appropriate.
- **The Board of Dietetics compensates its members.** The Board of Dietetics is comprised of both professional and citizen members and these Board members are provided compensation for their service to the citizens of Iowa.
- **We need licensure in Iowa in order to be part of the interstate compact that the Academy of Nutrition and Dietetics at the national level is working toward.**

As noted above, dietetic licensure is THE standard requirement of employment for both of my roles. In both positions, I work with people who have complex medical conditions which require specialized medical nutrition therapy, and the risk of harm if treated by unqualified individuals is significant. Just today, I was speaking with a student-athlete who was given a food sensitivity test by an out-of-state chiropractor – the results of which, advised that they had a severe sensitivity to dairy. It also concluded that the student-athlete had no sensitivities to peanuts or tree nuts despite them being severely allergic to both. Thankfully, this student-athlete was wise enough to understand that the test was flawed, but they were not told that by the chiropractor who administered it.

Much like it is not in my purview as a dietitian to diagnose anyone with a food allergy or intolerance (that is the responsibility of a physician who specializes in immunology), it is out of the purview of someone who is not a Registered Dietitian Nutritionist to provide medical nutrition therapy for these patients. Had this student-athlete not been wise enough to ignore the test saying it was safe to eat tree nuts and peanuts, the consequence could have been death. **DEATH.** It is imperative for the health, well-being, and safety of Iowans for Registered Dietitian Nutritionists to continue to be the healthcare professionals that are licensed to provide medical nutrition therapy.

I urge this subcommittee to reconsider the recommendation to eliminate the Board of Dietetics when it provides a final report to the Governor later this month.

Thank you for your consideration in this matter.





Comments, BCRC <bcrccomments@iowa.gov>

Athletic Trainer Licensure

1 message

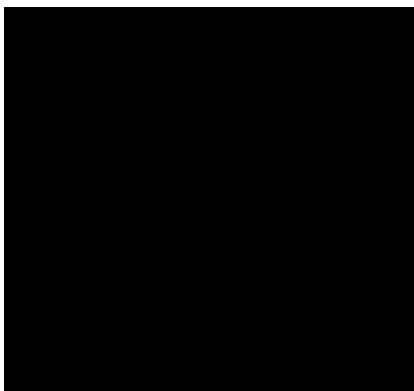
Thu, Sep 14, 2023 at 4:44 AM

To: "BCRCcomments@iowa.gov" <BCRCcomments@iowa.gov>

Dear Boards & Commissions Review Committee,

It has come to my attention that this committee is making the recommendation to eliminate the Iowa Board of Athletic Training. Respectfully, I strongly urge you to reconsider your position. As a manager for Iowa athletic trainers, I rely heavily on the board's rules and regulations during my hiring process to ensure that I hire someone qualified to exercise the job duties safely and effectively. If this board was eliminated, I would no longer be able to ensure the safety of my client's patients. This drastic measure would cause me to reconsider and rework how my department functions in our business operations. Normally, when I speak to clients, I can promise that our athletic trainers are always licensed and regulated to ensure safety for their patients. If your recommendation is implemented, I will have no way to promise safety to my client's patients.

Thank you for your consideration,



Confidentiality Notice: This e-mail communication and any attachments that accompany it may contain confidential, privileged, or proprietary data protected from disclosure under applicable law and is intended solely for the use of the individual(s) to whom it was intended to be addressed. If you are not the intended recipient, you are hereby notified that you have received this communication in error and that any review, disclosure, dissemination, distribution, copying, or other use or retention of it or its substance is prohibited. If you have received this communication in error, please notify me immediately by replying to this message or by telephone and deleting it from your computer. Thank you!



Comments, BCRC <bcrccomments@iowa.gov>

ASHRAE Mississippi Valley Chapter comments on State Boards and Commissions

1 message

Thu, Sep 14, 2023 at 7:49 AM

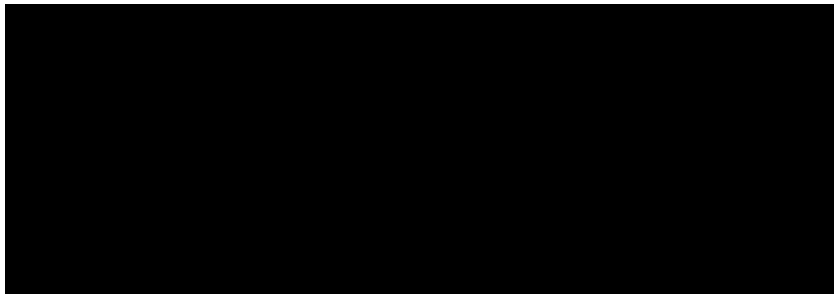
To: "BCRCcomments@iowa.gov" <BCRCcomments@iowa.gov>

Cc: [REDACTED]

The Mississippi Valley Chapter of ASHRAE is a non-profit professional organization representing approximately 100 professionals in the Heating, Ventilating, Refrigerating, and Air Conditioning industry. As such, we have a particular interest in several state boards and commissions. Reviewing the Committee's initial recommendations, we would like to note the following:

1. State Building Code Advisory Council (BCID #13, recommended for Elimination): The Advisory Council plays an important role in ensuring the safety, resilience, efficiency, and cost-effectiveness of construction in Iowa. It consists of people with expertise in construction and has a critical role in advising the Building Codes Commissioner regarding adoption of model building codes. This includes consulting on amendments to the model codes, which helps to customize them to the particular concerns of stakeholders in our state. If this Council is eliminated, we are concerned that the building code adoption process could be stalled, or that future model codes could be adopted without input from building professionals.
2. Boiler and Pressure Vessel Board (BCID #12, recommended for Elimination): This board was created to provide oversight for the state boiler inspector's office, and to have a panel of experts to review variance requests. We are concerned that, without this body, there will be no recourse for building owners and contractors that have reasonable requests for variances, and this could lead to untenable costs for owners of public assembly buildings such as churches, school districts, and healthcare facilities.
3. Engineering and Land Surveying Examining Board (BCID #23, recommended for Reorganization/Other Changes): As a large number of our members hold Professional Engineering (P.E.) licenses in the state, this board is critical to our profession, along with all other P.E. candidates and licensees in our state. Our main concern with any changes to this board would be to ensure that it does not create any undue delays or complications in the P.E. certification and renewal process.

We understand that updating and streamlining the Boards and Commissions is a substantial task, and we greatly appreciate the Committee's dedication to the process. We would like to offer our input and expertise in the process, and welcome the Committee to contact us for consultation on these matters. Thank you for your time and attention.



-



Comments, BCRC <bcrccomments@iowa.gov>

Concerns regarding the recommendation to eliminate the Board of Dietetics

1 message

Thu, Sep 14, 2023 at 8:36 AM

To: BCRCcomments@iowa.gov

Cc: david.jacoby@legis.iowa.gov, zach.wahls@legis.iowa.gov

Dear Members of the Boards and Commissions Review Committee,

My name is [REDACTED] and I am a registered and licensed dietitian working for Iowa State University Extension and Outreach.

I am sending this message in regard to the subcommittee recommendations that were issued on August 29, 2023. I am aware that within this report is a recommendation to eliminate the Iowa Board of Dietetics. As a registered and licensed dietitian nutritionist (RDN) in Iowa, this recommendation not only impacts my ability to continue my practice but also impacts **the constitutional duty of our state government to protect its citizens**. I strongly advise against the elimination of the Board of Dietetics and our licensure for the following reasons:

- **RDNs are specialized, highly trained healthcare professionals.** Similar to other healthcare professions with boards recommended to “continue,” RDNs must complete rigorous coursework that meets the accreditation standards within the Academy of Nutrition and Dietetics; complete a >1,000 hour supervised practicum; pass a national board examination; and take yearly continuing education.
- **RDNs are uniquely qualified to practice specialized nutrition care or Medical Nutrition Therapy.** RDNs scope of practice allows them to prescribe therapeutic diets to mitigate the effects of acute or chronic disease; to provide alternative nutrition when oral feeding is not possible or unsafe; to counsel individuals who are in need of improved nutrition; and to provide individualized nutritional guidance within the context of specific surgeries, drugs or treatments. Would you want an untrained, unlicensed professional providing that type of care for you, your child, or other loved one?
- **The Board of Dietetics protects Iowa citizens from unethical, harmful nutrition care.** The Board of Dietetics vets licensure applicants to ensure that competent, properly educated, ethically sound individuals practice as RDNs in Iowa. Applicants who have been found to be in violation of the law, derelict, impaired, or negligent in their practice, or who have engaged in practices that are not a part of the RDNs scope of practice are not granted licensure to practice in Iowa. Likewise, licensed dietitian practitioners found to be in similar violation or have not maintained continuing education requirements face sanction from this Board, with the possibility of probation or suspension of the license to practice.
- **Dietetic licensure has become THE standard requirement for employment for most of the 1100+ licensees within Iowa.** Registered Dietitians without licenses are not considered adequately credentialed for hire with healthcare organizations in Iowa. Infringement on this Board and with Dietetic Licensure would not be conducive to job creation.
- **The livelihood of many Iowa dietitians depends on licensure-required reimbursement.** Licensure provides health insurance companies and state and federal governments with the assurance that practitioners meet standards of professional competence in order to be

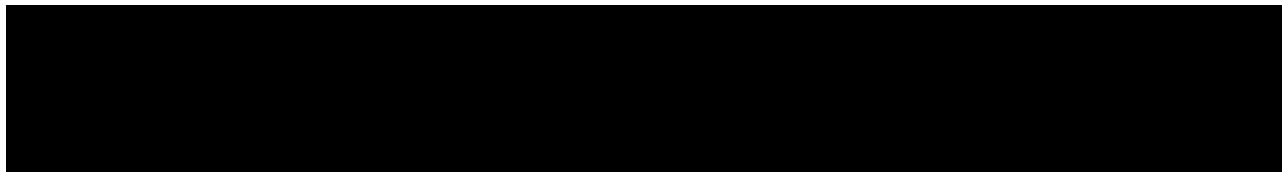
reimbursed for providing nutrition care services. In Iowa, medical nutrition therapy and therapeutic diets are provided by Registered AND Licensed Dietitians, and it is in Iowa law that these services MUST be provided by Registered AND Licensed Dietitians for insurance payment. This comes into play at the hospital/clinic levels, as well as long-term care facilities.

- **There is no taxpayer expense associated with the Board of Dietetics.** The fees that Licensed Dietitians pay to renew their license cover all costs incurred by the department that provides oversight. This Board has proven to be cost-effective and it operates consistently in the black each year.
- **The Board of Dietetics is efficient with its meetings.** The Board of Dietetics meets quarterly, and as needed. It has held virtual meetings for several years, when appropriate.
- **The Board of Dietetics compensates its members.** The Board of Dietetics is comprised of both professional and citizen members and these Board members are provided compensation for their service to the citizens of Iowa.
- **We need licensure in Iowa in order to be part of the interstate compact that the Academy of Nutrition and Dietetics at the national level is working toward.**

I urge this subcommittee to reconsider the recommendation to eliminate the Board of Dietetics when it provides a final report to the Governor later this month.

Thank you for your consideration in this matter.

--





Comments, BCRC <bcrccomments@iowa.gov>

American Physical Therapy Association Iowa Chapter Concerns

1 message

Mail [REDACTED] Thu, Sep 14, 2023 at 8:38 AM
To: "bcrccomments@iowa.gov" <bcrccomments@iowa.gov>
Cc: Doug Struyk <struyk@carneyappleby.com>

Iowa Boards and Commissions Review Committee

bcrccomments@iowa.gov

Date: September 12, 2023

RE: American Physical Therapy Association Iowa Chapter Concerns

Dear Committee Members,

On behalf of the American Physical Therapy Association Iowa Chapter members (APTA Iowa), we send this letter to inform the Boards and Commissions Review Committee that APTA Iowa has concerns with the combination of several licensure boards recommended by the Committee. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,



IA Boards and Commissions Review Letter 9.12.23.pdf
151K



Making Better Lives.

Rock Valley
PHYSICAL THERAPY

Iowa Boards and Commissions Review Committee
bcrccomments@iowa.gov

Date: September 14, 2023

RE: Physical Therapist Concerns

Dear Legislators,

I am an owner in Rock Valley Physical Therapy. Rock Valley Physical Therapy has 26 owner/partners and 546 employees. We are a private practice with 44 different locations in the state of Iowa. This issue is very important to our company because we are very invested in providing care for our patients, your constituents in Iowa.

I have concerns with the combination of several licensure boards recommended by the Committee. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

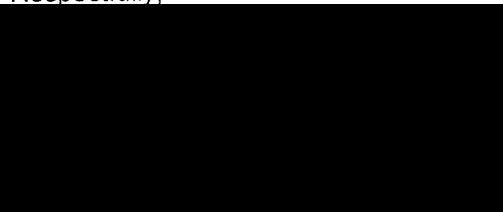
Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,





Making Better Lives.

Rock Valley
PHYSICAL THERAPY

Iowa Boards and Commissions Review Committee

bcrocomments@iowa.gov

Date: September 14, 2023

RE: Physical Therapist Concerns

Dear Legislators,

I am an owner in Rock Valley Physical Therapy. Rock Valley Physical Therapy has 26 owner/partners and 546 employees. We are a private practice with 44 different locations in the state of Iowa. This issue is very important to our company because we are very invested in providing care for our patients, your constituents in Iowa.

I have concerns with the combination of several licensure boards recommended by the Committee. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

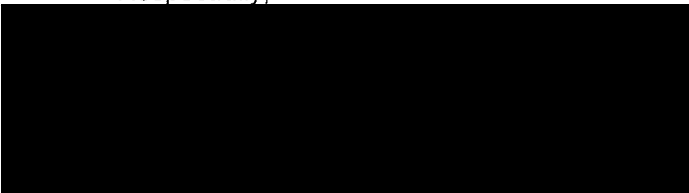
Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,





Comments, BCRC <bcrccomments@iowa.gov>

Respiratory Therapy and Polysomnography licensure board merging

1 message

[Redacted]

Thu, Sep 14, 2023 at 8:50 AM

To: "bcrccomments@iowa.gov" <bcrccomments@iowa.gov>

My name is [Redacted] I am apart of Iowa Society for Respiratory Care and I represent the respiratory therapy profession in the state of Iowa. I am voicing concern about the merging of the Respiratory Therapy and Polysomnography licensure board. We as respiratory therapists care for individuals that have trouble breathing such as traumas, premature birth, critical illnesses, COPD and asthma to name a few. We have been vital in the care and treatment of individuals with COVID-19 and RSV. We work under the direction of physicians. For the safety of patients, it is important that we join healthcare professionals that serve like patients.

When the merger occurs, we need a voice on the merged board to continue to assess competency for those practicing respiratory therapy and provide safe and effective respiratory care. We currently have 4 seats on the board, and we need to maintain these voices in a similar ratio. Given the possible list of medical boards, it seems fitting that we would fall under the board of medicine. Physicians are familiar with respiratory care, and we work in similar environments. Please take this into consideration as it may affect you or the care of your loved one when they are receiving care.

[Redacted]

Confidentiality Notice:

This e-mail, including any attachments is the property of Trinity Health and is intended for the sole use of the intended recipient(s). It may contain information that is privileged and confidential. Any unauthorized review, use, disclosure, or distribution is prohibited. If you are not the intended recipient, please delete this message, and reply to the sender regarding the error in a separate email.



Comments, BCRC <bcrccomments@iowa.gov>

Physical Therapy Licensure Board Changes

1 message

Thu, Sep 14, 2023 at 9:26 AM

[REDACTED]
To: "bcrccomments@iowa.gov" <bcrccomments@iowa.gov>

Thank you for your consideration.

Respectfully,

[REDACTED]

[REDACTED]

 **IA Boards and Commissions Review Letter 9.14.23.docx**
321K



Making Better Lives.

Rock Valley
PHYSICAL THERAPY

Iowa Boards and Commissions Review Committee
bcrcomments@iowa.gov

Date: September 14, 2023

RE: Physical Therapist Concerns

Dear Committee Members,

I am sending this letter to inform the Boards and Commissions Review Committee that I have concerns with the combination of several licensure boards recommended by the Committee. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

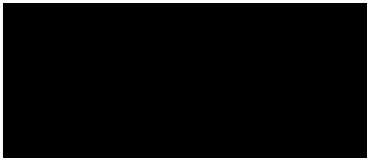
Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

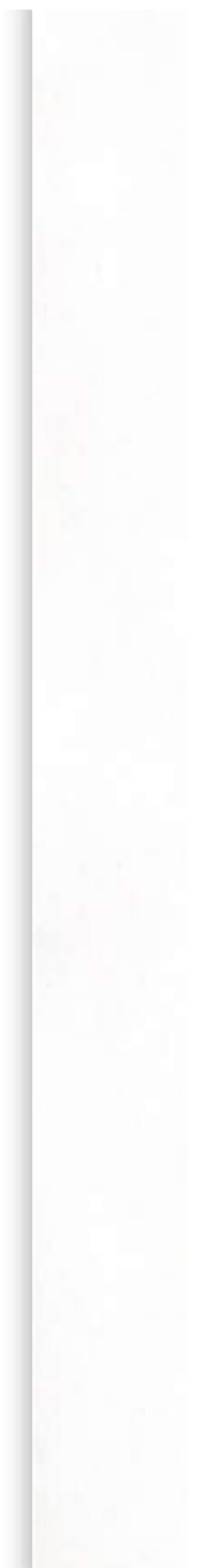
While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,



attachment 1.pdf



CARNEY & APPLEBY, P.L.C.
ATTORNEYS AT LAW

JAMES W. CARNEY
SCOTT A. HALL
DOUGLAS L. STRUYK
NICHOLAS J. MAURO
KATRINA L. RAISCH
JENNIFER G. DORMAN
JASPER P. VERHOFSTE
MICHAEL J. CARROLL
DANIELLE A. DUNNE

400 HOMESTEAD BUILDING
303 LOCUST STREET
DES MOINES, IOWA 50309-1770

Telephone (515) 282-6803
Facsimile (515) 282-4700

George W. Appleby, Retired

E-mail: struyk@carneyappleby.com

www.carneyappleby.com

September 14, 2023

Iowa Boards and Commissions Review Committee
bcrccomments@iowa.gov

RE: Iowa Association of Nurse Anesthetists Comments

Members of the Committee,

On behalf of our client, the Iowa Association of Nurse Anesthetists (IANA), we respectfully provide the following comment regarding the recommendation of the committee to reorganize the Iowa Board of Nursing.

It is our understanding that the goal of the committee with the reorganization is to reduce the number of members of various boards and to limit many of the specific criteria in Iowa code relating to board composition. The Iowa Board of Nursing currently requires four registered nurses, two of whom shall be actively engaged in practice, two of whom shall be nurse educators from nursing education programs; of these, one in higher education and one in area community and vocational-technical registered nurse education; one licensed practical nurse actively engaged in practice; and two members not registered nurses or licensed practical nurses and who shall represent the general public. The representatives of the general public shall not be members of health care delivery systems. *See* Iowa Code section 147.14(1)c.

The IANA certainly understands the concerns raised by the Committee with finding Iowans willing to serve and fitting the specific criteria of section 147.14. While this does create some difficulty in filling positions, the IANA believes representation of the various practice levels of the nursing profession is warranted.

As the Committee considers its final recommendations to the legislature, the IANA respectfully requests that the reorganized Board of Nursing specifically include representation of advanced register nurse practitioners (ARNP).

ARNPs are independent nursing practitioners in Iowa. There are four specialized areas of practice of ARNPs recognized in the Iowa Administrative Rules: Certified Clinical Nurse Specialist, Certified Nurse-Midwife, Certified Nurse Practitioner, and Certified Registered

Nurse Anesthetist. An ARNP licensed by the board may prescribe, administer, or dispense prescription drugs or devices, including controlled substances, within the ARNP's role and population foci and consistent with applicable state and federal laws. Additionally, ARNPs may:

- Assess health status;
- Obtain a relevant health and medical history;
- Perform physical examinations;
- Order preventive and diagnostic procedures;
- Formulate a differential diagnosis;
- Develop a treatment plan;
- Develop a patient education plan;
- Receive third-party reimbursement;
- Maintain hospital privileges;
- Promote health maintenance; and
- Supervise fluoroscopy.

ARNPs provide a significant amount of healthcare in our state, independent of physician supervision. The board of nursing is involved in regulating ARNPs and in developing their scope of practice. As independent practitioners with doctorates in nursing, the IANA believes their specific inclusion on the board of nursing would provide significant expertise in reviewing complaints before the board and in regulating the entirety of the nursing practice. Only a nurse trained at the ARNP level would have sufficient education, training, and expertise to understand the totality of ARNP practice and all other levels of nursing.

We would welcome the opportunity to discuss this suggestion with members of the Committee.

Respectfully,

Jim Carney

Doug Struyk

Jenny Dorman



Comments, BCRC <bcrccomments@iowa.gov>

Opposition to Combined PT, OT, Massage Therapists, Chiropractic Boards

1 message

Thu, Sep 14, 2023 at 9:40 AM

To: bcrccomments@iowa.gov

Iowa Boards and Commissions Review Committee

bcrccomments@iowa.gov

Dear Committee Members,

As a member of the APTA Iowa and a licensed physical therapist in Iowa, I am opposed to the proposed combining or chiropractors, massage therapists, physical therapists, and occupational therapists into the same licensure board. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,



Work well. Play well. Live well.

www.21stcenturyrehab.com



Iowa Boards and Commissions Review Committee

Date: September 14, 2023

RE: Physical Therapist Concerns

Dear Legislators,

I am an owner in Rock Valley Physical Therapy. Rock Valley Physical Therapy has 26 owner/partners and 546 employees. We are a private practice with 44 different locations in the state of Iowa. This issue is very important to our company because we are very invested in providing care for our patients, your constituents in Iowa.

I have concerns with the combination of several licensure boards recommended by the Committee. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

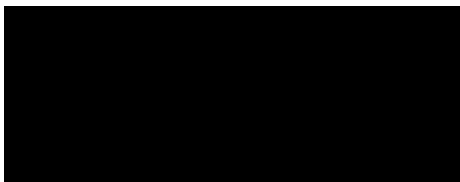
Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,





Comments, BCRC <bcrccomments@iowa.gov>

American Physical Therapy Association Iowa Chapter Concerns

1 message

Thu, Sep 14, 2023 at 10:55 AM

To: bcrccomments@iowa.gov



Iowa Boards and Commissions Review Committee

bcrccomments@iowa.gov

Date: September 14, 2023

RE: American Physical Therapy Association Iowa Chapter Concerns

Dear Committee Members,

On behalf of the American Physical Therapy Association Iowa Chapter members (APTA Iowa), I am sending this letter to inform the Boards and Commissions Review Committee that APTA Iowa has concerns with the combination of several licensure boards recommended by the Committee. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

I appreciate your consideration.

Respectfully,





Comments, BCRC <bcrccomments@iowa.gov>

APTA Iowa Chapter Concerns

1 message

Thu, Sep 14, 2023 at 11:00 AM

To: bcrccomments@iowa.gov

Iowa Boards and Commissions Review Committee
RE: American Physical Therapy Association Iowa Chapter Concerns

Dear Committee Members,

On behalf of the American Physical Therapy Association Iowa Chapter members (APTA Iowa), we send this letter to inform the Boards and Commissions Review Committee that APTA Iowa has concerns with the combination of several licensure boards recommended by the Committee. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

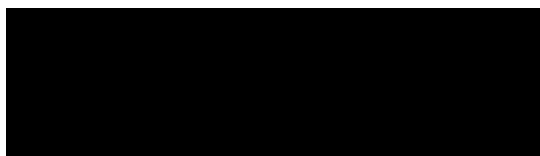
Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

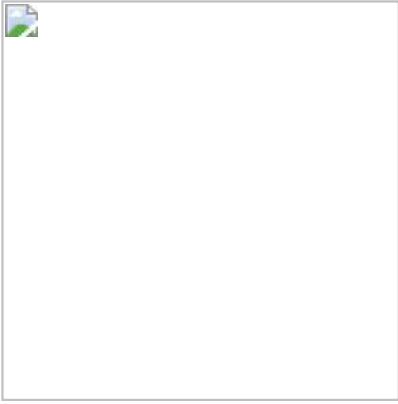
While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,



--





Comments, BCRC <bcrccomments@iowa.gov>

American Physical Therapy Association Iowa Chapter Concerns

1 message

Thu, Sep 14, 2023 at 11:37 AM

To: bcrccomments@iowa.gov

Dear Committee Members,

As a member of the APTA Iowa and a licensed physical therapist in Iowa, I am opposed to the proposed combining of chiropractors, massage therapists, physical therapists, and occupational therapists into the same licensure board. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,

A black rectangular redaction box covering the signature of the sender.



Comments, BCRC <bcrccomments@iowa.gov>

(no subject)

1 message

[Redacted]

Thu, Sep 14, 2023 at 11:41 AM

To: bcrccomments@iowa.gov

Dear Committee Members,

As a member of the APTA Iowa and a licensed physical therapist in Iowa, I am opposed to the proposed combining of chiropractors, massage therapists, physical therapists, and occupational therapists into the same licensure board. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

PT's and PTA's possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

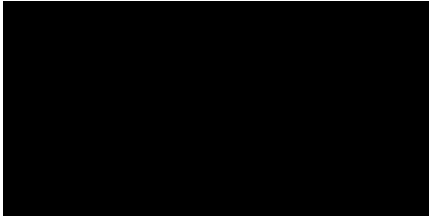
Respectfully,

[Redacted signature]

--
[Redacted signature]

9/14/23, 2:21 PM

State of Iowa Mail - (no subject)





Comments, BCRC <bcrccomments@iowa.gov>

Proposed elimination of the Iowa Boiler Board

1 message

Thu, Sep 14, 2023 at 11:39 AM

To: "jennifer.konfrst@legis.iowa.gov" <jennifer.konfrst@legis.iowa.gov>, "jane.bloomingtondale@legis.iowa.gov" <jane.bloomingtondale@legis.iowa.gov>, "BCRCcomments@iowa.gov" <BCRCcomments@iowa.gov>

Hi,

My name is [REDACTED] and I am a NBB certified boiler inspector, certified with the state of Iowa, Missouri, Georgia and Florida and a member of the Iowa Boiler Board. I am writing in regards to proposed elimination of the Iowa Boiler Board and asking for support to question the reason we would want to eliminate this very important board. I moved to Florida in June but still remain on the board to serve out my term as it can be done virtually. Coming to Florida where there is no boiler board and the State has much looser guidelines really opens my eyes to how important these programs are. In Florida we don't inspect high pressure boilers that are not in public assembly and in my short time I have found some with non certified welds on these vessels. The danger that can arise in just a short time and cannot be reversed quickly can cause great danger to the citizens of Iowa. Just to give a little background on myself, I worked in manufacturing of tanks and pressure vessels for 20 years prior to becoming an insurance inspector for the last 10 plus years. I just recently joined the Iowa Boiler Board in hopes to better serve the community and provide a perspective of safety and clarity within the boiler department. I hope you will take a closer look into this request and feel free to reach out to me with any questions.

Also I ask you to review the attached document from the U.S Chemical Safety and Hazard Investigation Board showing the results of a fatal failure in St Louis from 2017 at Loy-Lange, this may help better understand the potential danger with lack of oversight from an experienced board.

 **Loy_Lange_Box_Company_Report_-_Final.pdf**
4669K



Comments, BCRC <bcrccomments@iowa.gov>

Opposition to combining licensure boards

1 message

[Redacted]

Thu, Sep 14, 2023 at 11:54 AM

To: bcrccomments@iowa.gov

Dear Committee Members,

I am a physical therapist who practices in Hampton Iowa. I am contacting you on behalf of myself, fellow physical therapist and on behalf of the American Physical Therapy Association Iowa Chapter members (APTA Iowa). To inform the Boards and Commissions Review Committee that APTA Iowa and myself have concerns with the combination of several licensure boards recommended by the Committee. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

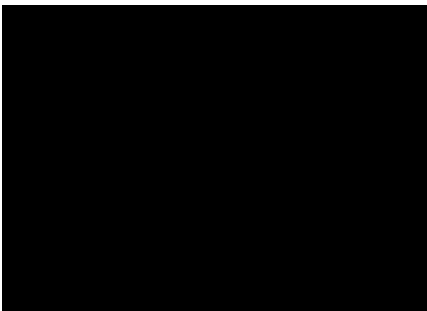
Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

I appreciate your consideration.

Respectfully,





Making Better Lives.

Rock Valley
PHYSICAL THERAPY

Iowa Boards and Commissions Review Committee
bcrcomments@iowa.gov

Date: September 14, 2023

RE: Physical Therapist Concerns

Dear Legislators,

I am an owner in Rock Valley Physical Therapy. Rock Valley Physical Therapy has 26 owner/partners and 546 employees. We are a private practice with 44 different locations in the state of Iowa. This issue is very important to our company because we are very invested in providing care for our patients, your constituents in Iowa.

I have concerns with the combination of several licensure boards recommended by the Committee. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.





Comments, BCRC <bcrccomments@iowa.gov>

American Physical Therapy Association Iowa Chapter Concerns

1 message

[Redacted]

Thu, Sep 14, 2023 at 12:07 PM

To: bcrccomments@iowa.gov

Dear Committee Members,

On behalf of the American Physical Therapy Association Iowa Chapter members (APTA Iowa), we send this letter to inform the Boards and Commissions Review Committee that APTA Iowa has concerns with the combination of several licensure boards recommended by the Committee. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public. Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical and Occupational therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical and occupational therapy. Independent boards of physical/occupational therapy provide oversight by maintaining peer and public members on the board. By allowing physical/occupational therapists to oversee the regulation of physical/occupational therapy, protection of the public can be maintained.

Other health care providers are not qualified to regulate physical/occupational therapy and could have interests that conflict with or limit the practice of physical/occupational therapy. While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists.

A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,

--
[Redacted Signature]



Comments, BCRC <bcrccomments@iowa.gov>

Changes to licensure board

1 message

Thu, Sep 14, 2023 at 12:14 PM

To: bcrccomments@iowa.gov

Dear Committee Members,

As a member of the APTA Iowa and a licensed physical therapist in Iowa, I am opposed to the proposed combining or chiropractors, massage therapists, physical therapists, and occupational therapists into the same licensure board. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

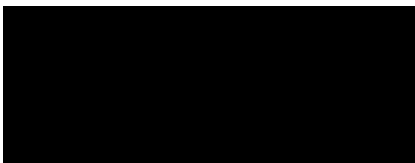
Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,



Work well. Play well. Live well.

www.21stcenturyrehab.com



Comments, BCRC <bcrccomments@iowa.gov>

Changes to Licensure Board

1 message

Thu, Sep 14, 2023 at 12:15 PM

To: bcrccomments@iowa.gov

Dear Committee Members,

As a member of the APTA Iowa and a licensed physical therapist in Iowa, I am opposed to the proposed combining of chiropractors, massage therapists, physical therapists, and occupational therapists into the same licensure board. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

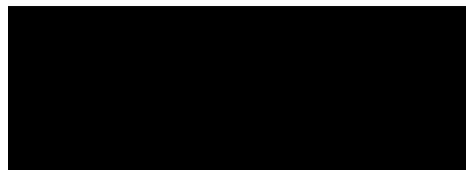
Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,



Work well. Play well. Live well.

www.21stcenturyrehab.com



Comments, BCRC <bcrccomments@iowa.gov>

Physical Therapy licensure

1 message

To: bcrccomments@iowa.gov

Thu, Sep 14, 2023 at 12:15 PM

Iowa Boards and Commissions Review Committee

bcrccomments@iowa.gov

Dear Committee Members,

As a member of the APTA Iowa and a licensed physical therapist in Iowa, I am opposed to the proposed combining of chiropractors, massage therapists, physical therapists, and occupational therapists into the same licensure board. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,





Comments, BCRC <bcrccomments@iowa.gov>

Changes to licensure board

1 message

Thu, Sep 14, 2023 at 12:17 PM

To: bcrccomments@iowa.gov

Dear Committee Members,

As a member of the Iowa APTA and a licensed physical therapist assistant in Iowa, I am opposed to the proposed combining of chiropractors, massage therapists, physical therapists, and occupational therapists into the same licensure board. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,

[Redacted signature]



Comments, BCRC <bcrccomments@iowa.gov>

Changes to licensure board

1 message

Thu, Sep 14, 2023 at 12:19 PM

To: bcrccomments@iowa.gov

Dear Committee Members,

As a member of the APTA Iowa and a licensed physical therapist in Iowa, I am opposed to the proposed combining or chiropractors, massage therapists, physical therapists, and occupational therapists into the same licensure board. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,

[Redacted signature]



Comments, BCRC <bcrccomments@iowa.gov>

Iowa Boards and Commissions Review Committee

1 message

Thu, Sep 14, 2023 at 12:23 PM

To: bcrccomments@iowa.gov

Dear Committee Members,

As a member of the APTA Iowa and a licensed physical therapist in Iowa, I am opposed to the proposed combining of chiropractors, massage therapists, physical therapists, and occupational therapists into the same licensure board. This combination into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

I appreciate your consideration.

Respectfully,

A black rectangular redaction box covering the signature of the sender.



Comments, BCRC <bcrccomments@iowa.gov>

RE: Physical Therapy Board Concerns

1 message

[Redacted]

Thu, Sep 14, 2023 at 12:23 PM

To: bcrccomments@iowa.gov

Iowa Boards and Commissions Review Committee
bcrccomments@iowa.gov

Date: September 14, 2023

Dear Committee Members,

I am writing with regarding my concerns with the proposed combination of several licensure boards recommended by the Committee. The combination of physical therapists, occupational therapists, chiropractors, and massage therapists into one board could result in significant issues.

These professions have different interests and ideas about what the other professions should or should not be doing, and I do not believe it is the place of any profession to be involved in another profession's practice act. Historically there have been "turf battles" over health care professions' scopes of practice, which may cause conflict between the professions. There would also be issues when it comes to oversight and peer review. As a physical therapist, I do not have the ability or knowledge to decide the appropriateness of care provided by a chiropractor in some cases, for example. This lack of oversight or direction could potentially cause harm to the public.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

Over the past 22 years of being a physical therapist, I have known that the PT and OT boards are combined. I never understood this philosophy since we are separate professions, but I know that in most cases PTs and OTs work intimately for patient care. While becoming an independent board is unlikely, I can see the need to increase efficiency, and could understand adding speech pathology and audiology to the current physical and occupational therapy licensure board, but do not believe chiropractors and massage therapists should be included. There have been issues even within the last several years where the chiropractic or massage therapy board has opposed something that the physical and occupational therapy boards have supported which shows the goals are not always congruent. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

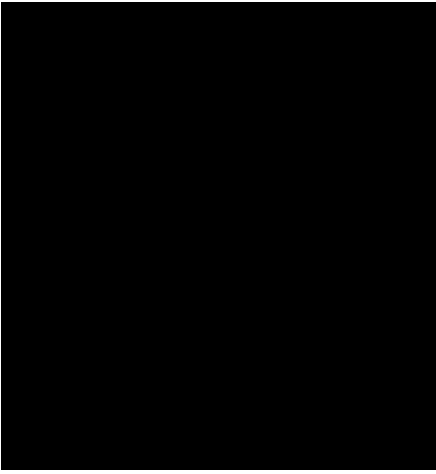
Please consider this as you make your decision. Thank you for your time.

[Redacted]

--
[Redacted]

9/14/23, 2:23 PM

State of Iowa Mail - RE: Physical Therapy Board Concerns





Comments, BCRC <bcrccomments@iowa.gov>

Iowa Boards and Commissions Review Committee

1 message

Thu, Sep 14, 2023 at 12:25 PM

To: bcrccomments@iowa.gov

Dear Committee Members,

As a member of the APTA Iowa and a licensed physical therapist in Iowa, I am opposed to the proposed combining of chiropractors, massage therapists, physical therapists, and occupational therapists into the same licensure board. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

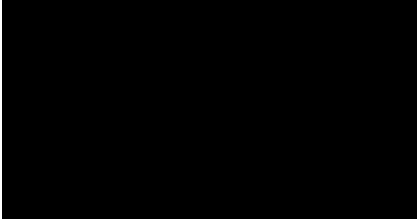
Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,

A black rectangular redaction box covering the signature of the sender.



Iowa Boards and Commissions Review Committee

bcrccomments@iowa.gov

Date: September 14, 2023

RE: American Physical Therapy Association Iowa Chapter Concerns

Dear Committee Members,

On behalf of the American Physical Therapy Association Iowa Chapter members (APTA Iowa), we send this letter to inform the Boards and Commissions Review Committee that APTA Iowa has concerns with the combination of several licensure boards recommended by the Committee. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

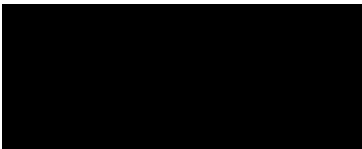
Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,





Making Better Lives.
Rock Valley
PHYSICAL THERAPY

Iowa Boards and Commissions Review Committee
bcrcomments@iowa.gov

Date: September 14, 2023

RE: Physical Therapist Concerns

Dear Legislators,

I am an owner in Rock Valley Physical Therapy. Rock Valley Physical Therapy has 26 owner/partners and 546 employees. We are a private practice with 44 different locations in the state of Iowa. This issue is very important to our company because we are very invested in providing care for our patients, your constituents in Iowa.

I have concerns with the combination of several licensure boards recommended by the Committee. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,





Comments, BCRC <bcrccomments@iowa.gov>

Changes to our regulatory licensure board

1 message

[Redacted]

Thu, Sep 14, 2023 at 12:34 PM

To: bcrccomments@iowa.gov

Iowa Boards and Commissions Review Committee

bcrccomments@iowa.gov

Dear Committee Members,

As a member of the APTA Iowa and a licensed physical therapist in Iowa, I am opposed to the proposed combining or chiropractors, massage therapists, physical therapists, and occupational therapists into the same licensure board. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

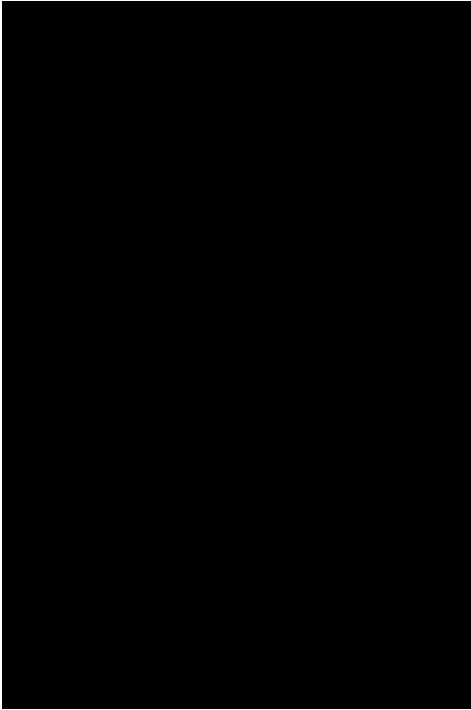
We appreciate your consideration.

Respectfully,

[Redacted signature]

--

[Redacted signature]



Work well. Play well. Live well.

www.21stcenturyrehab.com



Comments, BCRC <bcrccomments@iowa.gov>

Licensure Board

1 message

To: bcrccomments@iowa.gov

Thu, Sep 14, 2023 at 12:35 PM

Dear Committee Members,

As a member of the APTA Iowa and a licensed physical therapist in Iowa, I am opposed to the proposed combining or chiropractors, massage therapists, physical therapists, and occupational therapists into the same licensure board. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

Thank you for your consideration,





Comments, BCRC <bcrccomments@iowa.gov>

American Physical Therapy Association Iowa Chapter Concerns

1 message

[Redacted]

Thu, Sep 14, 2023 at 12:39 PM

To: bcrccomments@iowa.gov

Dear Committee Members,

On behalf of the American Physical Therapy Association Iowa Chapter members (APTA Iowa), we send this letter to inform the Boards and Commissions Review Committee that APTA Iowa has concerns with the combination of several licensure boards recommended by the Committee. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers. We appreciate your consideration.

Respectfully,

[Redacted Signature]



Comments, BCRC <bcrccomments@iowa.gov>

Keep Iowa Dietetics Licensure intact

1 message

Thu, Sep 14, 2023 at 12:46 PM

To: BCRCcomments@iowa.gov

Dear Members of the Boards and Commissions Review Committee,

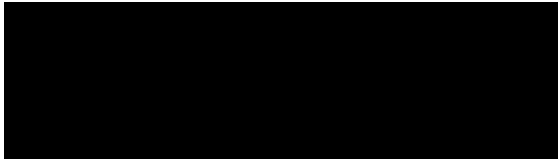
I am a newly registered and licensed dietitian in Iowa. To receive licensure I completed a 4 year undergraduate program and a 2 year graduate program including over 1000 hours of supervised practice in the fields of community dietetics, food service, long term care, and medical nutrition therapy. Carrying the title of licensed dietitian means that a professional has devoted a significant amount of time and energy to being in the top of their field. Without protection for this licensure, consumers could be subject to sub-par and even dangerous input from anyone who wishes to call themselves a nutritionist. In addition, I must complete continuing education to continue to keep my registration and licensure and to ensure that I stay up-to-date with the most current dietary recommendations. Licensure is an important part to ensure the safety and wellbeing of the constituents you are trying to protect - please keep dietetics licensure intact.

I am sending this message in regard to the subcommittee recommendations that were issued on August 29, 2023. I am aware that within this report is a recommendation to eliminate the Iowa Board of Dietetics. As a registered and licensed dietitian nutritionist (RDN) in Iowa, this recommendation not only impacts my ability to continue my practice but also impacts **the constitutional duty of our state government to protect its citizens**. I strongly advise against the elimination of the Board of Dietetics and our licensure for the following reasons:

- **RDNs are specialized, highly trained healthcare professionals.** Similar to other healthcare professions with boards recommended to "continue," RDNs must complete rigorous coursework that meets the accreditation standards within the Academy of Nutrition and Dietetics; complete a >1,000 hour supervised practicum; pass a national board examination; and take yearly continuing education.
- **RDNs are uniquely qualified to practice specialized nutrition care or Medical Nutrition Therapy.** RDNs scope of practice allows them to prescribe therapeutic diets to mitigate the effects of acute or chronic disease; to provide alternative nutrition when oral feeding is not possible or unsafe; to counsel individuals who are in need of improved nutrition; and to provide individualized nutritional guidance within the context of specific surgeries, drugs or treatments. Would you want an untrained, unlicensed professional providing that type of care for you, your child, or other loved one?
- **The Board of Dietetics protects Iowa citizens from unethical, harmful nutrition care.** The Board of Dietetics vets licensure applicants to ensure that competent, properly educated, ethically sound individuals practice as RDNs in Iowa. Applicants who have been found to be in violation of the law, derelict, impaired, or negligent in their practice, or who have engaged in practices that are not a part of the RDNs scope of practice are not granted licensure to practice in Iowa. Likewise, licensed dietitian practitioners found to be in similar violation or have not maintained continuing education requirements face sanction from this Board, with the possibility of probation or suspension of the license to practice.
- **Dietetic licensure has become THE standard requirement for employment for most of the 1100+ licensees within Iowa.** Registered Dietitians without licenses are not considered adequately credentialed for hire with healthcare organizations in Iowa. Infringement on this Board and with Dietetic Licensure would not be conducive to job creation.
- **The livelihood of many Iowa dietitians depends on licensure-required reimbursement.** Licensure provides health insurance companies and state and federal governments with the assurance that practitioners meet standards of professional competence in order to be reimbursed for providing nutrition care services. In Iowa, medical nutrition therapy and therapeutic diets are provided by Registered AND Licensed Dietitians, and it is in Iowa law that these services MUST be provided by Registered AND Licensed Dietitians for insurance payment. This comes into play at the hospital/clinic levels, as well as long-term care facilities.

- **There is no taxpayer expense associated with the Board of Dietetics.** The fees that Licensed Dietitians pay to renew their license cover all costs incurred by the department that provides oversight. This Board has proven to be cost-effective and it operates consistently in the black each year.
- **The Board of Dietetics is efficient with its meetings.** The Board of Dietetics meets quarterly, and as needed. It has held virtual meetings for several years, when appropriate.
- **The Board of Dietetics compensates its members.** The Board of Dietetics is comprised of both professional and citizen members and these Board members are provided compensation for their service to the citizens of Iowa.
- **We need licensure in Iowa in order to be part of the interstate compact that the Academy of Nutrition and Dietetics at the national level is working toward.**

I urge this subcommittee to reconsider the recommendation to eliminate the Board of Dietetics when it provides a final report to the Governor later this month.





Comments, BCRC <bcrccomments@iowa.gov>

Concerns with combination of boards

1 message

Thu, Sep 14, 2023 at 12:51 PM

To: bcrccomments@iowa.gov

Date: September 14, 2023

RE: American Physical Therapy Association Iowa Chapter Concerns Dear Committee Members,

On behalf of the American Physical Therapy Association Iowa Chapter members (APTA Iowa), we send this letter to inform the Boards and Commissions Review Committee that APTA Iowa has concerns with the combination of several licensure boards recommended by the Committee. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,

[Redacted signature]



Making Better Lives.
Rock Valley
PHYSICAL THERAPY

Iowa Boards and Commissions Review Committee
bcrcomments@iowa.gov

Date: September 14, 2023

RE: Physical Therapist Concerns

Dear Legislators,

I am an owner in Rock Valley Physical Therapy. Rock Valley Physical Therapy has 26 owner/partners and 546 employees. We are a private practice with 44 different locations in the state of Iowa. This issue is very important to our company because we are very invested in providing care for our patients, your constituents in Iowa.

I have concerns with the combination of several licensure boards recommended by the Committee. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,

[Redacted Signature]



Comments, BCRC <bcrccomments@iowa.gov>

Opposition to Combination of Licensure Boards (PT, OT, Massage Therapy, Chiropractors)

1 message

[Redacted]

Thu, Sep 14, 2023 at 12:58 PM

To: bcrccomments@iowa.gov

Dear Committee Members,

As a member of the APTA Iowa and a licensed physical therapist in Iowa, I am opposed to the proposed combining or chiropractors, massage therapists, physical therapists, and occupational therapists into the same licensure board. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, I request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

I appreciate your consideration.

Respectfully,

[Redacted]

[Redacted]

Work well. Play well. Live well.

www.21stcenturyrehab.com



Comments, BCRC <bcrccomments@iowa.gov>

(no subject)

1 message

Thu, Sep 14, 2023 at 1:06 PM

To: "bcrccomments@iowa.gov" <bcrccomments@iowa.gov>

Dear Committee Members,

As a member of the APTA Iowa and a licensed physical therapist in Iowa, I am STRONGLY opposed to the proposed combining of chiropractors, massage therapists, physical therapists, and occupational therapists into the same licensure board. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,

A solid black rectangular box used to redact the sender's name and signature.



Comments, BCRC <bcrccomments@iowa.gov>

American Physical Therapy Association Iowa Chapter Concerns

1 message

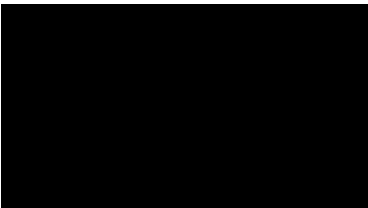
Thu, Sep 14, 2023 at 1:14 PM

To: bcrccomments@iowa.gov

Dear Committee Members,

On behalf of the American Physical Therapy Association Iowa Chapter members (APTA Iowa we send this letter to inform the Boards and Commissions Review Committee that APTA Iowa has concerns with the combination of several licensure boards recommended by the Committee. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues. The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public. Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation. Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy. While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers. We appreciate your consideration.

Respectfully,



~Work Well, Play Well, Live Well~



Making Better Lives.

Rock Valley
PHYSICAL THERAPY

Iowa Boards and Commissions Review Committee
bcrccomments@iowa.gov

Date: September 14, 2023

RE: Physical Therapist Concerns

Dear Legislators,

I am an owner in Rock Valley Physical Therapy. Rock Valley Physical Therapy has 26 owner/partners and 546 employees. We are a private practice with 44 different locations in the state of Iowa. This issue is very important to our company because we are very invested in providing care for our patients, your constituents in Iowa.

I have concerns with the combination of several licensure boards recommended by the Committee. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

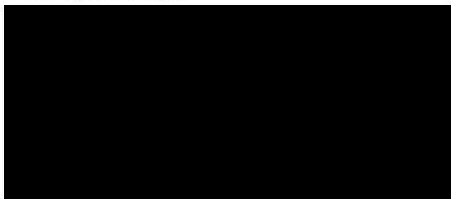
Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,





Comments, BCRC <bcrccomments@iowa.gov>

Respiratory Therapy Licensure Board

1 message

Thu, Sep 14, 2023 at 1:36 PM

To: "bcrccomments@iowa.gov" <bcrccomments@iowa.gov>

To Whom it may concern,

My name is [REDACTED] I am a practicing Respiratory Care Provider and I am representing the respiratory therapy profession in the state of Iowa. I am voicing my concern about the merging of the Respiratory Therapy and Polysomnography licensure board. Respiratory therapists care for individuals that have trouble breathing such as traumas, premature birth, critical illnesses, COPD and asthma to name a few. We have been vital in the care and treatment of individuals with COVID-19 and RSV. We work under the direction of physicians. For the safety of patients, it is important that we join healthcare professionals that serve like patients.

When the merger occurs, we need a voice on the merged board to continue to assess competency for those practicing respiratory therapy and provide safe and effective respiratory care. We currently have 4 seats on the board, and we need to maintain these voices in a similar ratio. Given the possible list of medical boards, it seems fitting that we would fall under the board of medicine. Physicians are familiar with respiratory care, and we work in similar environments.

If consolidation/merge is what is needed, I strongly urge you to maintain the voice of Respiratory Therapy on a newly merged board, suggesting the board of medicine."

Thank you,

[REDACTED]

Confidentiality Notice:

This e-mail, including any attachments is the property of Trinity Health and is intended for the sole use of the intended recipient(s). It may contain information that is privileged and confidential. Any unauthorized review, use, disclosure, or distribution is prohibited. If you are not the intended recipient, please delete this message, and reply to the sender regarding the error in a separate email.



Comments, BCRC <bcrccomments@iowa.gov>

Elimination of Board of Dietetics

1 message

Thu, Sep 14, 2023 at 1:41 PM

To: "BCRCcomments@iowa.gov" <BCRCcomments@iowa.gov>

Dear Boards and Commissions Review Board,

As a Registered and Licensced Dietitian in the State of Iowa since the late 1970s, I am contacting you to tell you why you are so wrong to eliminate the Board of Dietetics.

The profession of Dietetics came about during WWI in 1917 and evolved from there with extensive formal training and education to protect consumers (Iowans) against unsafe and inaccurate nutrition advice. Dietitian and Nutritionist are not interchangeable. No one regulates a nutritionist!

Dietitians are uniquely educated with a Bachelor of Science degree, 1000 hours of an approved internship and most Dietitians have a Masters degree. We then must pass a national exam of competency and maintain this with 30 hours of continuing education every 2 years in Iowa to continue to practice. Our formal education includes emphasis in anatomy, physiology, biochemistry, pathophysiology and medical nutritional therapy to be able to practice within our scope.

The American Academy of Dietetics, with 72,000 members, registers, credentials and certifies dietitians and is one of the oldest professions to do this. Dietitians in Iowa have been liscened by the State of Iowa since 1978 with 1100+ practicing Dietitians currently.

Dietitians specialty areas of dietetics include: Pediatrics and Pediatric Critical Care, Obesity/Weight Management, Oncology, Renal/Dialysis, Diabetes Mellitus, Critical Care, Enteral/Parental Nutrition, Sports Nutrition, Wellness and Gerontology (this is huge in Iowa). Medicare and Medicaid require a Dietitian and Medical Nutritional Therapy for insurance coverage.

So as you see, Dietitians bring essential expertise, like no other, to Iowa and Iowans that protect their health.

If you have any questions for me: [Redacted]

Respectfully,

[Redacted]

9/14/23, 2:29 PM

State of Iowa Mail - Elimination of Board of Dietetics

Sent from [Mail](#) for Windows



Comments, BCRC <bcrccomments@iowa.gov>

(no subject)

1 message

Thu, Sep 14, 2023 at 2:43 PM

To: "bcrccomments@iowa.gov" <bcrccomments@iowa.gov>

Dear Committee Members,

As a member of the IOTA Iowa and a licensed Occupational therapist in Iowa, I am opposed to the proposed combining of chiropractors, massage therapists, physical therapists, and occupational therapists into the same licensure board. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists/Occupational Therapist possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical/occupational therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical/occupational therapists to oversee the regulation of physical/occupational therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical/occupational therapy and could have interests that conflict with or limit the practice of physical/occupational therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

9/15/23, 8:30 AM

State of Iowa Mail - (no subject)





Comments, BCRC <bcrccomments@iowa.gov>

Fwd:

1 message

Thu, Sep 14, 2023 at 2:56 PM

To: bcrccomments@iowa.gov

----- Forwarded message -----

From:

Date: Thu, Sep 14, 2023, 2:55 PM

Subject:

To: <bcrccomments@iowa.gov>

"My name is [REDACTED] I am a Respiratory Therapist at Jones Regional Medical Center. I am voicing concern about the merging of the Respiratory Therapy and Polysomnography licensure board. Respiratory therapists care for individuals that have trouble breathing such as traumas, premature birth, critical illnesses, COPD and asthma to name a few. We have been vital in the care and treatment of individuals with COVID-19 and RSV. We work under the direction of physicians. For the safety of patients, it is important that we join healthcare professionals that serve like patients.

When the merger occurs, we need a voice on the merged board to continue to assess competency for those practicing respiratory therapy and provide safe and effective respiratory care. We currently have 4 seats on the board, and we need to maintain these voices in a similar ratio. Given the possible list of medical boards, it seems fitting that we would fall under the board of medicine. Physicians are familiar with respiratory care, and we work in similar environments.

If consolidation/merge is what is needed, I strongly urge you to maintain the voice of Respiratory Therapy on a newly merged board, suggesting the board of medicine." Thank you for your time and consideration.

Sincerely,

[REDACTED]



Comments, BCRC <bcrccomments@iowa.gov>

Independent Physical Therapy Licensure Board

1 message


To: bcrccomments@iowa.gov

Thu, Sep 14, 2023 at 3:00 PM

Dear Committee Members,

As a member of the APTA Iowa and a licensed physical therapist in Iowa, I am opposed to the proposed combining of chiropractors, massage therapists, physical therapists, and occupational therapists into the same licensure board. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

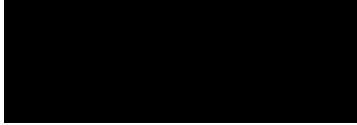
Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of

interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,





Comments, BCRC <bcrccomments@iowa.gov>

Elimination of Building Code Advisory Council

1 message

Thu, Sep 14, 2023 at 3:17 PM

[REDACTED]
To: BCRCcomments@iowa.gov

Dear Members of the Boards & Commissions Review Committee,

I am writing you to request that you reconsider the proposal to eliminate the Building Code Advisory Council, and to consolidate/merge the Building Code Board of Review.

The council and board serve important functions in keeping Iowa's building code updated in response to the needs to adapt to our changing climate.

Respectively,

[REDACTED]



Comments, BCRC <bcrccomments@iowa.gov>

Concern

1 message


to: bcrccomments@iowa.gov

Thu, Sep 14, 2023 at 3:22 PM

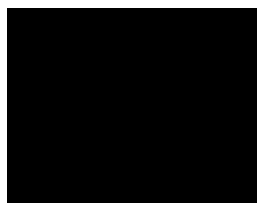
Dear Board and Commission Review Committee,

I am writing to place my public comment that the Iowa Chiropractic Licensure Board should not be combined and merged with any other boards. This creates many issues that impact public safety including:

- This creates a safety issue by combining and diluting the expertise on the board knowledge to deal with cases.
- This will tax volunteers who serve on these boards and will require additional meetings and hearings for different professions
- We currently struggle getting adequate investigations going in a timely manner to protect our profession and this will exacerbate the issue.

Thank you for considering this comment. We ask for your reconsideration to merge the Iowa Chiropractic Licensure Board with any other boards at this time.

Sincerely,





Comments, BCRC <bcrccomments@iowa.gov>

RT Licensure Board Elimination/Consolidation

1 message

Signe Hovet <hovet1325@gmail.com>
To: bcrccomments@iowa.gov

Thu, Sep 14, 2023 at 4:00 PM

"My name is [REDACTED] I am a graduate of a respiratory therapy program in Cedar Rapids, IA and hold an Iowa Respiratory license. I am voicing concern about the merging of the Respiratory Therapy and Polysomnography licensure board. Respiratory therapists care for individuals that have trouble breathing such as traumas, premature birth, critical illnesses, COPD and asthma to name a few. We have been vital in the care and treatment of individuals with COVID-19 and RSV. We work under the direction of physicians. For the safety of patients, it is important that we join healthcare professionals that serve like patients.

When the merger occurs, we need a voice on the merged board to continue to assess competency for those practicing respiratory therapy and provide safe and effective respiratory care. We currently have 4 seats on the board, and we need to maintain these voices in a similar ratio. Given the possible list of medical boards, it seems fitting that we would fall under the board of medicine. Physicians are familiar with respiratory care, and we work in similar environments.

If consolidation/merge is what is needed, I strongly urge you to maintain the voice of Respiratory Therapy on a newly merged board, suggesting the board of medicine."

Thank you,
[REDACTED]

9/15/23, 8:32 AM

State of Iowa Mail - RT Licensure Board Elimination/Consolidation

Sent from my iPhone



Comments, BCRC <bcrccomments@iowa.gov>

Physical Therapy licensure board

1 message

Thu, Sep 14, 2023 at 4:14 PM

To: bcrccomments@iowa.gov

Dear Committee Members,

As a member of the APTA Iowa and a licensed physical therapist in Iowa, I am opposed to the proposed combining of chiropractors, massage therapists, physical therapists, and occupational therapists into the same licensure board. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

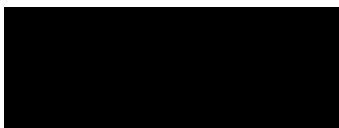
Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education (usually a doctorate degree) and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

I appreciate your consideration.

Respectfully,





Comments, BCRC <bcrccomments@iowa.gov>

Respiratory Therapist

1 message

Thu, Sep 14, 2023 at 4:17 PM

[REDACTED]
To: bcrccomments@iowa.gov

To whom it may concern,

"My name is [REDACTED] I am voicing concern about the merging of the Respiratory Therapy and Polysomnography licensure board. Respiratory therapists care for individuals that have trouble breathing such as traumas, premature birth, critical illnesses, COPD and asthma to name a few. We have been vital in the care and treatment of individuals with COVID-19 and RSV. We work under the direction of physicians. For the safety of patients, it is important that we join healthcare professionals that serve like patients.

When the merger occurs, we need a voice on the merged board to continue to assess competency for those practicing respiratory therapy and provide safe and effective respiratory care. We currently have 4 seats on the board, and we need to maintain these voices in a similar ratio. Given the possible list of medical boards, it seems fitting that we would fall under the board of medicine. Physicians are familiar with respiratory care, and we work in similar environments.

If consolidation/merge is what is needed, I strongly urge you to maintain the voice of Respiratory Therapy on a newly merged board, suggesting the board of medicine."

Thank you.

[REDACTED]



Comments, BCRC <bcrccomments@iowa.gov>

Iowa Boards and Commissions Review Committee: PT/OT Licensure Board

1 message

Thu, Sep 14, 2023 at 4:46 PM

To: "bcrccomments@iowa.gov" <bcrccomments@iowa.gov>

From: [REDACTED]

To: Iowa Boards and Commissions Review Committee bcrccomments@iowa.gov

Date: September 14, 2023

RE: Physical Therapy Concerns

Dear Committee Members,

As a member of the APTA Iowa and a licensed PT in Iowa, I am opposed to the proposed combining of chiropractors, massage therapists, physical therapists, and occupational therapists into the same licensure board. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess high degrees of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for fewer conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

I appreciate your consideration of this request.

Respectfully,





Comments, BCRC <bcrccomments@iowa.gov>

Letter of opposition to deregulating the Iowa Board of a Athletic Training

1 message

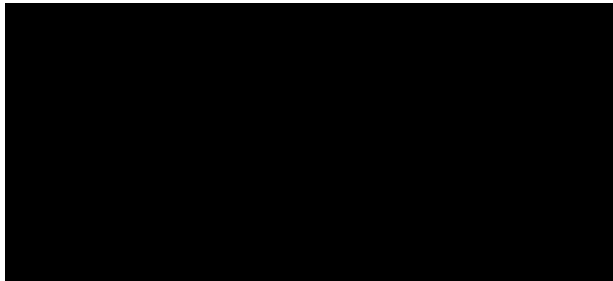
Thu, Sep 14, 2023 at 4:54 PM

[REDACTED]
To: "BCRCcomments@iowa.gov" <BCRCcomments@iowa.gov>

To whom it may concern

Please accept the attached letter of opposition to the proposed deregulation of the Iowa Board of Athletic Training. Please contact me with any questions that you have or if I can help provide additional information.

Respectfully,



 **IOWA Letter 9.14.23.pdf**
90K



October 14, 2023

Boards and Commissions Review Committee:

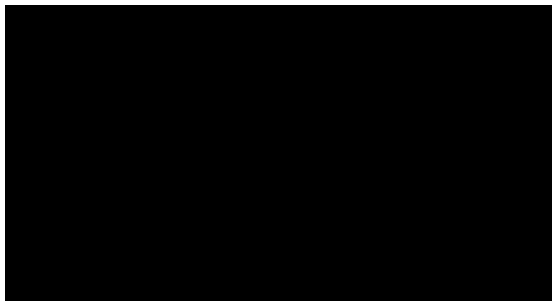
My name is [REDACTED] the president of the Kansas Athletic Trainers' Society and the Program Director for the Master of Science in Athletic Training Program at the Kansas State University. I am contacting you today in opposition to the proposal to eliminate the Board of Athletic Training and the Licensure of Athletic Trainers in the State of Iowa. As you are aware, licensure provides the highest level of patient protection for the public's safety, and it is the standard form of regulation for healthcare professions. Athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS) and are assigned National Provider Identifier numbers (NPIs). The American Medical Association also recognizes athletic training as an allied health care profession.

As allied healthcare professionals, Athletic Trainers are required to earn a master's degree to obtain certification. We work with patients and athletes daily to prevent, evaluate, treat, and rehabilitate injuries and other conditions. We are also present to provide the necessary immediate care and activate an emergency action plan/response and hold a vital role in the care of concussions; having trained professionals who can diagnose and treat head injuries accurately and effectively is necessary for safe participation in sports. As recently demonstrated in the Damar Hamlin case, which highlights the vital role that Athletic Trainers have in the care of their patients, Athletic Trainers were the first on scene and providing care, and ultimately attributed to being the critical first stage in saving his life.

Athletic Trainers have one of the largest patient populations that includes children, young adults and adults. The Iowa Board of Athletic Training is critical in protecting these populations against harm, ensuring competent and ethical healthcare providers are in place to provide quality care to the citizens of Iowa. Deregulation of Athletic Trainer's in your state is counterintuitive if you want to ensure that the patients in your state remain safe and under the watchful eye of qualified, educated healthcare professionals.

Thank you for your time and I hope you will strongly consider opposing the elimination of the Iowa Board of Athletic Training.

Respectfully,





Comments, BCRC <bcrccomments@iowa.gov>

RE: Board Consolidation

1 message

Thu, Sep 14, 2023 at 5:14 PM

To: BCRCcomments@iowa.gov

To Whom It May Concern,

I have several comments to submit in opposition of combining boards for mental health providers. I believe that combining boards without any clear restructuring of the process and without any accountability will be a disaster for licensed mental health providers and the clients we serve. I am a social worker/ therapist, and I own a small practice. I've recently been witness to a number of significant and potentially harmful consequences related to the already slow and inefficient process.

- The Board does not process complaints in a timely manner.
- A 2021 complaint involving violations around unethical practice and potential harm to clients has taken nearly two years to investigate and fully process. In this case, the licensee/person of concern was granted an independent license (months after a serious complaint was filed). Because of the Board's slow response, this therapist has been practicing without any sanction for the past two years. I've heard of other serious cases involving harm to clients that have taken around two years to reach sanction.
- If the Board is sanctioning a licensee because of wrongdoing or code violations, we should not be waiting months or years to remediate violations and certainly should not be doing so if there is a potential for harm to clients. Clients and licensees deserve due process. It's worth questioning whether the Board is serving a useful function if they determine something is egregious enough to warrant a sanction, but the unlawful and unethical behavior continues for years after a complaint is made.
- I am aware of a case in which a colleague, who had made a good faith complaint after careful consideration and consultation, received a retaliatory complaint despite the rules and the Board members indicating retaliation is not permitted. This retaliatory complaint has been sitting with the Board for nearly six months.
- The Board does not reliably respond to questions about the Iowa Code or related compliance issues. Social Workers in Iowa have been advised to contact a specific person on the Board when we have concerns or questions about the rules; however, I've sent a number of emails and made a phone call to to this person with no response in months. Several of my colleagues report a similar lack of response. It's unfortunate that we don't have a reliable solution for clarifying questions that licensees might have regarding compliance.
- The Board is not functioning efficiently now. My understanding is that this is due to being overburdened with responsibilities and meeting very infrequently. We have been told, "the wheels turn slowly," but taking years to close a case of unethical behavior toward clients is unacceptable and Iowans deserve better. Slowing this process down by combining boards will undoubtedly result in further erosion of trust and confidence in the Board. Most importantly, this will cause more harm to the vulnerable people the Board is already failing to protect.

I hope this committee gives consideration to some of the specific and very serious implications related to Board responsibilities and accountabilities. Combining boards without a plan for how to efficiently handle complaints in a reasonable and timely manner will guarantee harm comes to clients.

Respectfully,

A black rectangular redaction box covering the signature of the sender.



Comments, BCRC <bcrccomments@iowa.gov>

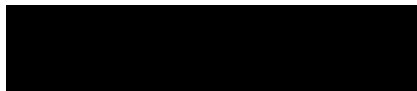
Re: Physical Therapy Licensure Board Changes

1 message

Thu, Sep 14, 2023 at 6:59 PM

[REDACTED]
To: "bcrccomments@iowa.gov" <bcrccomments@iowa.gov>

Thank you for this consideration. As a previous member/chair of the currently combined Iowa Board of Physical and Occupational Therapists I would be more than happy to provide testimony to the committee.



 **Re_ PHYSICAL THERAPY Licensure Board.pdf**
235K



Making Better Lives.

Rock Valley
PHYSICAL THERAPY

Iowa Boards and Commissions Review Committee

bcrcomments@iowa.gov

Date: September 14, 2023

RE: Physical Therapist Concerns

Dear Committee Members,

I am sending this letter to inform the Boards and Commissions Review Committee that I have concerns with the combination of several licensure boards recommended by the Committee. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public. This is the primary function of the board and should be central to any decision making.

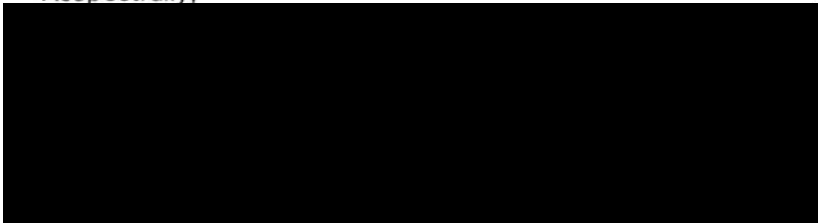
Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. **Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.**

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,





Comments, BCRC <bcrccomments@iowa.gov>

Respiratory Therapy and Polysomnography Licensing Board

1 message

Thu, Sep 14, 2023 at 7:02 PM

[REDACTED]
To: "bcrccomments@iowa.gov" <bcrccomments@iowa.gov>

Hello,

I am [REDACTED] I have worked in respiratory therapy since 1977. I am a member of the Iowa Society of Respiratory Care and the American Association of Respiratory Care. I have been a member of both since 1977.

As respiratory therapists, we were on the front lines during COVID-19 treating patients on high flow oxygen, on ventilators, and ECHO machines. One minute we can treat a 99-year-old in the emergency dept. The next we could be in the delivery room waiting for a 22-week gestation infant to be born. We care for patients from the moment they take their first breath until their last breath. We work under the direction of a physicians. It is very important to work together with practitioners trained as we have been, to treat fellow lowans.

I understand that some of the boards may be consolidated in the near future. I strongly recommend to not eliminate the respiratory therapy and polysomnography licensure board. There are currently 4 members on that board with technical training and expertise in each of the fields. If the respiratory therapy and polysomnography licensure board needs to be merged with another board, I strongly recommend that this board be merged with the board of medicine. Merging this board with physical therapy or chiropractic care would not be of a benefit to either board. Physicians are quite familiar with the care respiratory therapists and polysomnographers give out patients.

Please do not simply eliminate the licensure board or the need for licensing of the respiratory therapists and polysomnographers. We are trained in the therapies for treating patients, unlike other disciplines which are given a broad introduction to a therapy.

Thank you,

[REDACTED]



Iowa Boards and Commissions Review Committee
bcrcomments@iowa.gov

Date: September 14, 2023

RE: Physical Therapist Concerns

Dear Legislators,

I am an owner in Rock Valley Physical Therapy. Rock Valley Physical Therapy has 26 owner/partners and 546 employees. We are a private practice with 44 different locations in the state of Iowa. This issue is very important to our company because we are very invested in providing care for our patients, your constituents in Iowa.

I have concerns with the combination of several licensure boards recommended by the Committee. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,

[Redacted Signature]



Comments, BCRC <bcrccomments@iowa.gov>

American Physical Therapy Association Iowa Chapter Concerns

1 message

[Redacted]

Thu, Sep 14, 2023 at 8:07 PM

To: bcrccomments@iowa.gov

Dear Committee Members,

On behalf of the American Physical Therapy Association Iowa Chapter members (APTA Iowa), we send this letter to inform the Boards and Commissions Review Committee that APTA Iowa has concerns with the combination of several licensure boards recommended by the Committee. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers. We appreciate your consideration.

Respectfully,

[Redacted Signature]

Work well. Play well. Live well.

www.21stcenturyrehab.com



Comments, BCRC <bcrccomments@iowa.gov>

Iowa Boards and Commissions Review Committee

1 message

A black rectangular redaction box covering the sender's name.

Thu, Sep 14, 2023 at 9:47 PM

To: bcrccomments@iowa.gov

Dear Committee Members,

As a member of the APTA Iowa and a licensed physical therapist in Iowa, I am opposed to the proposed combining or chiropractors, massage therapists, physical therapists, and occupational therapists into the same licensure board. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,

A black rectangular redaction box covering the sender's signature.



Comments, BCRC <bcrccomments@iowa.gov>

Iowa Physical Therapy Board

1 message

Thu, Sep 14, 2023 at 10:05 PM

TO: bcrccomments@iowa.gov

Dear Committee Members,

I am a physical therapist in Iowa and an active member of the Iowa physical therapy association. I send this letter to inform the Boards and Commissions Review Committee that APTA Iowa has concerns with the combination of several licensure boards recommended by the Committee. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice act issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

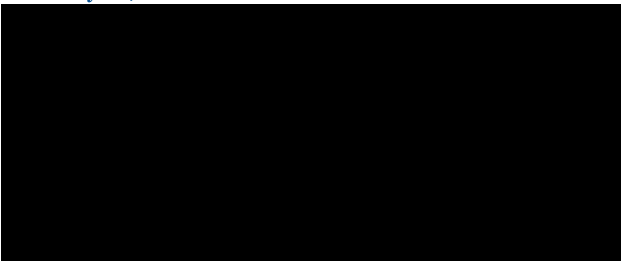
Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

--

Thank you,





Comments, BCRC <bcrccomments@iowa.gov>

(no subject)

1 message

Fri, Sep 15, 2023 at 7:40 AM

To: bcrccomments@iowa.gov

Dear Committee Members,

As a member of the AOTA Iowa and a licensed occupational therapist in Iowa, I am opposed to the proposed combining of chiropractors, massage therapists, physical therapists, and occupational therapists into the same licensure board. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of occupational therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

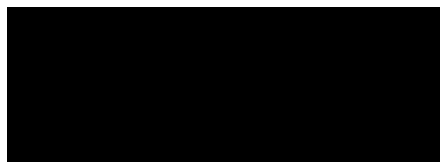
Occupational therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of occupational therapy provide oversight by maintaining peer and public members on the board. By allowing occupational therapists to oversee the regulation of occupational therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate occupational therapy and could have interests that conflict with or limit the practice of occupational therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with physical therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,

--







Comments, BCRC <bcrccomments@iowa.gov>

APTA Iowa Concerns

1 message

Fri, Sep 15, 2023 at 7:48 AM

[REDACTED]
To: bcrccomments@iowa.gov

Dear Committee Members,

As a member of the APTA Iowa and a licensed physical therapist in Iowa, I am opposed to the proposed combining of chiropractors, massage therapists, physical therapists, and occupational therapists into the same licensure board. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,



Comments, BCRC <bcrccomments@iowa.gov>

Iowa chapter concerns

1 message

Fri, Sep 15, 2023 at 8:13 AM

To: bcrccomments@iowa.gov

Dear Committee Members,

As a member of the AOTA and IOTA and a licensed occupational therapist in Iowa, I am opposed to the proposed combining of chiropractors, massage therapists, physical therapists, and occupational therapists into the same licensure board. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of occupational therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Occupational therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of occupational therapy. Independent boards of occupational therapy provide oversight by maintaining peer and public members on the board. By allowing occupational therapists to oversee the regulation of occupational therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate occupational therapy and could have interests that conflict with or limit the practice of occupational therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with physical therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,

[Redacted signature]



Comments, BCRC <bcrccomments@iowa.gov>

Respiratory Care Licensure Board

1 message

Fri, Sep 15, 2023 at 9:14 AM

To: "bcrccomments@iowa.gov" <bcrccomments@iowa.gov>

My name is [REDACTED] I am a Registered Respiratory Therapist and an instructor of Respiratory Care in Iowa. I am voicing concern about the merging of the Respiratory Therapy and Polysomnography licensure board. Respiratory therapists care for individuals who have trouble breathing such as traumas, premature birth, critical illnesses, COPD, and asthma to name a few. We have been vital in caring for and treating individuals with COVID-19 and RSV. We work under the direction of physicians. For the safety of patients, it is essential that we join healthcare professionals who serve similar patient populations.

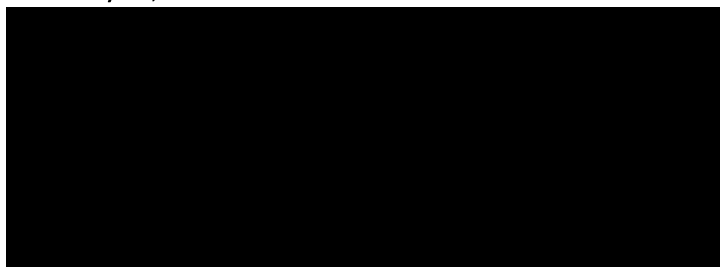
When the merger occurs, we need a voice on the merged board to continue to assess the competency of those practicing respiratory therapy and provide safe and effective respiratory care. We currently have 4 seats on the board, and we need to maintain these voices in a similar ratio. Given the possible list of medical boards, it seems fitting that we

would fall under the Board of Medicine. Physicians are familiar with respiratory care, and we work in similar environments.

If consolidation/merge is what is needed, I strongly urge you to maintain the voice of Respiratory Therapy on a newly merged board, suggesting the board of medicine.

If the Respiratory Therapy board loses its place at the table for discussions, I am concerned that could lead to less accountability regarding competencies. Most of our students remain in Iowa for employment following graduation. Respiratory Therapists' education is just starting when they graduate and pass boards. In order to stay competent we must continue to grow and adjust to the most up-to-date evidence-based information.

Thank you,





Comments, BCRC <bcrccomments@iowa.gov>

(no subject)

1 message

Fri, Sep 15, 2023 at 9:20 AM

[REDACTED]
to: bcrccomments@iowa.gov

Dear Committee Members,

As a member of the APTA Iowa and a licensed physical therapist in Iowa, I am opposed to the proposed combining or chiropractors, massage therapists, physical therapists, and occupational therapists into the same licensure board. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

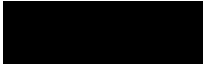
While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,

--

[REDACTED]



Work well. Play well. Live well.
www.21stcenturyrehab.com





Comments, BCRC <bcrccomments@iowa.gov>

Iowa Boards and Commissions Review Committee

1 message

Fri, Sep 15, 2023 at 9:24 AM

To: bcrccomments@iowa.gov

Dear Committee Members,

As a member of the APTA Iowa and a licensed physical therapist in Iowa, I am opposed to the proposed combining of chiropractors, massage therapists, physical therapists, and occupational therapists into the same licensure board. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,

--




Work well. Play well. Live well.
www.21stcenturyrehab.com





Making Better Lives.

Rock Valley
PHYSICAL THERAPY

Iowa Boards and Commissions Review Committee
bcrccomments@iowa.gov

Date: September 14, 2023

RE: Physical Therapist Concerns

Dear Legislators,

I am an owner of Rock Valley Physical Therapy. Rock Valley Physical Therapy has 26 owners/partners and 546 employees. We are a private practice with 44 separate locations in Iowa. This issue is particularly important to our company because we are very invested in providing care for our patients, your constituents in Iowa.

I have concerns about the combination of several licensure boards recommended by the Committee. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

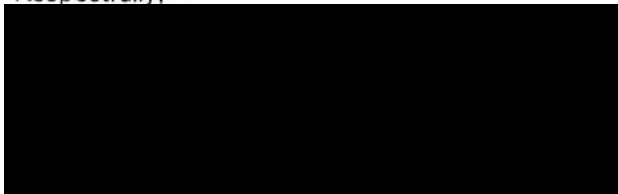
Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for fewer conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,





Comments, BCRC <bcrccomments@iowa.gov>

Do not consolidate the Iowa Board of Social Work

1 message

Fri, Sep 15, 2023 at 11:27 AM

[REDACTED]
To: BCRCcomments@iowa.gov

I am writing in opposition to the proposal to consolidate the Iowa Board of Social Work with the Board of Behavioral Science, or any other board. As someone with a LMSW license, I value the expertise of the Board of Social Work regarding our specific professional code of ethics, values, and training/educational requirements. Social workers take a unique and valuable approach to mental and behavioral health services, and we need oversight from our experienced peers. I read the comments of the NASW-IA board president-elect on this matter, and I agree that a merger would weaken our license and create more inefficiency, rather than reducing it.

Social work is unique and sometimes poorly understood by people outside the profession. We are trained to be able to work in a multitude of settings and to approach situations with a systems perspective - which means we are valued on interdisciplinary teams and provide holistic resources and support to our clients. We act in a multitude of care settings and hold the highest number of licenses to provide clinical mental health services in the state. During this mental health crisis in our state, consolidating our professional board will dilute the strength of our license. We need robust oversight to maintain a high standard of ethical practice and care.

I am asking that the Iowa Board of Social Work be removed from the list of recommendations for consolidation.





Comments, BCRC <bcrccomments@iowa.gov>

Board of Athletic Training

1 message

[REDACTED]
to: bcrccomments@iowa.gov

Fri, Sep 15, 2023 at 11:57 AM

My name is [REDACTED] I am an athletic trainer and one of your constituents. I work as an athletic trainer in public safety for police and firefighters.

The BCRC has proposed the elimination of the Board of Athletic Training. As a licensed healthcare provider, I am concerned about the impact of this proposal on the health and safety of the public.

By eliminating AT licensure, it would allow untrained or unqualified individuals to pose as a healthcare provider. Please reach out to the committee members to maintain the Board of Athletic Training. I am happy to answer any questions, please feel free to contact me at this email.

Athletic Training is healthcare!

[REDACTED]

September 13, 2023
Iowa Boards and Commissions Review Committee
Delivered Via Email

RE: Boiler and Pressure Vessel Board–Support for Retaining & Opposition to Eliminating

Dear Members of the Boards and Commissions Review Committee,

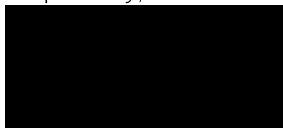
The National Association of Mutual Insurance Companies (NAMIC) membership includes more than 1,400 member companies. The association supports regional and local mutual insurance companies on main streets across America and many of the country's largest national insurers. NAMIC member companies write over \$4.9 billion in annual premiums in the state. In Iowa we have 273 member companies, including 36 domiciled companies, which underwrite 88% of homeowners and 65% of auto insurance coverage.

NAMIC writes to urge the review committee not to recommend eliminating the boiler and pressure vessel board in its final findings and recommendations to the Governor later this month.

The boiler and pressure vessel board is an important mechanism for all industries, including insurance, to provide input, expertise and discussion in this highly specialized area. The board plays a critical role in risk reduction, ensuring compliance, and guaranteeing a fair appeals process. Through promoting greater safety in boiler and pressure vessels through activities like rules relating to installation, inspections, and maintenance as well as structured consideration of waivers the Board plays an important role in reducing risk to life and property.

For these reasons and others, NAMIC strongly opposes the elimination of the Boiler and Pressure Vessel Board and requests that the review committee recommend the continuation of the board its final recommendations. Thank you for your consideration.

Respectfully,



NAMIC Regional Vice President, Midwest

Dear Members of the Boards and Commissions Review Committee,

My name is [REDACTED] and I have been a Registered, Licensed Dietitian working in Iowa for over eight years. I have earned awards and recognition in my field. I am the type of hard-working Iowan that our state is proud of and should want to retain as a citizen. I am sending this message in regard to the subcommittee recommendations that were issued on August 29, 2023. I am aware that within this report is a recommendation to eliminate the Iowa Board of Dietetics. As a registered and licensed dietitian nutritionist (RDN) in Iowa, this recommendation not only impacts my ability to continue my practice but also impacts **the constitutional duty of our state government to protect its citizens. I do not see the point of eliminating the board, as there is no taxpayer expense associated with it.** I strongly advise against the elimination of the Board of Dietetics and our licensure for the following reasons:

- **RDNs are specialized, highly trained healthcare professionals.** Similar to other healthcare professions with boards recommended to “continue,” RDNs must complete rigorous coursework that meets the accreditation standards within the Academy of Nutrition and Dietetics; complete a >1,000 hour supervised practicum; pass a national board examination; and take yearly continuing education.
- **RDNs are uniquely qualified to practice specialized nutrition care or Medical Nutrition Therapy.** RDNs scope of practice allows them to prescribe therapeutic diets to mitigate the effects of acute or chronic disease; to provide alternative nutrition when oral feeding is not possible or unsafe; to counsel individuals who are in need of improved nutrition; and to provide individualized nutritional guidance within the context of specific surgeries, drugs or treatments. Would you want an untrained, unlicensed professional providing that type of care for you, your child, or other loved one?
- **The Board of Dietetics protects Iowa citizens from unethical, harmful nutrition care.** The Board of Dietetics vets licensure applicants to ensure that competent, properly educated, ethically sound individuals practice as RDNs in Iowa. Applicants who have been found to be in violation of the law, derelict, impaired, or negligent in their practice, or who have engaged in practices that are not a part of the RDNs scope of practice are not granted licensure to practice in Iowa. Likewise, licensed dietitian practitioners found to be in similar violation or have not maintained continuing education requirements face sanction from this Board, with the possibility of probation or suspension of the license to practice.
- **Dietetic licensure has become THE standard requirement for employment for most of the 1100+ licensees within Iowa.** Registered Dietitians without licenses are not considered adequately credentialed for hire with healthcare organizations in Iowa. Infringement on this Board and with Dietetic Licensure would not be conducive to job creation.
- **The livelihood of many Iowa dietitians depends on licensure-required reimbursement.** Licensure provides health insurance companies and state and

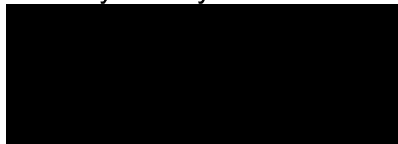
federal governments with the assurance that practitioners meet standards of professional competence in order to be reimbursed for providing nutrition care services. In Iowa, medical nutrition therapy and therapeutic diets are provided by Registered AND Licensed Dietitians, and it is in Iowa law that these services MUST be provided by Registered AND Licensed Dietitians for insurance payment. This comes into play at the hospital/clinic levels, as well as long-term care facilities.

- **There is no taxpayer expense associated with the Board of Dietetics.** The fees that Licensed Dietitians pay to renew their license cover all costs incurred by the department that provides oversight. This Board has proven to be cost-effective and it operates consistently in the black each year.
- **The Board of Dietetics is efficient with its meetings.** The Board of Dietetics meets quarterly, and as needed. It has held virtual meetings for several years, when appropriate.
- **The Board of Dietetics compensates its members.** The Board of Dietetics is comprised of both professional and citizen members and these Board members are provided compensation for their service to the citizens of Iowa.
- **We need licensure in Iowa in order to be part of the interstate compact that the Academy of Nutrition and Dietetics at the national level is working toward.**

By eliminating the Board of Dietetics and potentially licensure, you are forcing out an industry of dietitians, including myself, who will need to look for credible, professional employment in other states with these avenues of protection.

I urge this subcommittee to reconsider the recommendation to eliminate the Board of Dietetics when it provides a final report to the Governor later this month.

Thank you for your consideration in this matter.



Date: September 15th, 2023

RE: Iowa Speech Language Hearing Association Concerns

Dear Committee Members,

On behalf of the Iowa Speech Language Hearing Association (ISHA) and in conjunction with the American Physical Therapy Association (APTA) and the American Occupational Therapy Association (AOTA) Iowa chapters, we send this letter to inform the Boards and Commissions Review Committee that ISHA has concerns with the combination of several licensure boards recommended by the Committee. The combination of chiropractors, physical therapists, occupational therapists, speech language pathologists, audiologists, respiratory therapists, and massage therapists into one board could result in significant issues. Additionally, eliminating the board of hearing instrument specialists poses significant safety risks as well.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of hearing aid dispensers with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

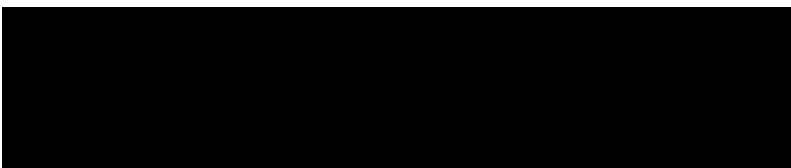
Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Audiologists and speech language pathologists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of audiology and speech-language pathology. Independent boards of audiology and speech language pathology provide oversight by maintaining peer and public members on the board. By allowing audiologists and speech language pathologists to oversee the regulation of their field, protection of the public can be maintained. Other health care providers are not qualified to regulate audiology and speech-language pathology and could have interests that conflict with or limit the practice of speech language pathology and audiology.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with speech pathology and adding physical therapy and occupational therapy, removing chiropractors, respiratory therapists, and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

In addition to these concerns, ISHA is also troubled by the proposed elimination of the board of hearing instrument dispenser which poses great risks to the public who have a medical hearing loss, as well as the potential for misinformation for children under the age of 18. Without this oversight, individuals who have a medical condition may not get the referrals needed posing serious safety risks to the public who have a hearing loss. It is important to have provisions in place with the advent of over-the-counter devices to ensure proper diagnosis and treatment is present in our state.

Thank you for your consideration.





Comments, BCRC <bcrccomments@iowa.gov>

consolidation of Iowa Boards

1 message

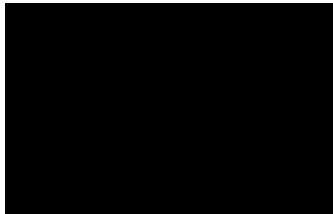
Fri, Sep 15, 2023 at 6:28 PM

To: BCRCcomments@iowa.gov

Cc: [REDACTED]

I have been licensed independent social worker in the state of Iowa since 1990. I request that the Iowa Board of Social Work be removed from the list of recommendations for consolidation. During the pandemic, I started seeing clients for mental health treatment via Telehealth. This has opened the doors for many clients to receive services they would not have received otherwise, and continues to be the case. NASW IA has been working to form an Interstate Compact so that in the event a client goes on vacation or goes to college, or moves, the therapist-client relationship can be continued through Telehealth. Currently I would have to have a license in whichever state the client is in, which is not feasible. If Social Work is combined with other Boards, it will make creating this compact much more difficult and possibly impossible.

Thank you for your consideration,





Comments, BCRC <bcrccomments@iowa.gov>

Regarding Dietetics Board and Licensure of Iowa Dietitians

1 message

Fri, Sep 15, 2023 at 8:10 PM

To: BCRCcomments@iowa.gov

To Whom It May Concern:

I am writing to ask your support to keep the Board of Dietetics and that Dietitians be licensed in the state of Iowa. If the Board of Dietetics is eliminated then I fear what will follow is one does not need a license to practice dietetics in Iowa.

I am a licensed and registered dietitian in the State of Iowa and practice at Unity Point Diabetes and Kidney Center in Cedar Rapids. I have been licensed and registered for 34 years. Why would licensure be important?

- 1) RDs are specialized and highly trained professionals. We need rigorous coursework that meets accreditation standards; have to complete a 1,000 hour supervised practicum, pass a national board exam, and take yearly continuing education.
- 2) RDs scope of practice allows us to practice specialized nutrition care or Medical Nutrition Therapy. If your child or a loved one had celiac disease or fructose intolerance or diabetes or cancer, or congestive heart failure, and other disease conditions, would you want an untrained, unlicensed "professional" providing that type of specialized nutrition care?
- 3) The purpose of a license is to protect the public from harm and unsafe and unethical practices.
- 4) Many insurance companies and Medicare require nutrition services be provided by a licensed registered dietitian in order for reimbursement.
- 5) Healthcare organizations, clinics, hospitals, care centers require the professional they are hiring to be licensed.

Licensure is essential for the safety and well-being of our Iowa citizens. If a person's disease condition is harmed by someone who is not licensed, will that not require more health dollars to give the person back the quality of health they deserve?

Please vote to keep the Iowa Board of Dietetics and vote to keep Licensure for Dietitians to practice in our state.

Thank you,




Comments, BCRC <bcrccomments@iowa.gov>

Please vote NO to eliminate the Iowa Board of Dietetics

1 message

Sat, Sep 16, 2023 at 3:49 PM

To: BCRCcomments@iowa.gov

Dear Members of the Boards and Commissions Review Committee,

My name is [REDACTED] and I have been a Registered and Licensed Dietitian in the State of Iowa for 11 years. My dietetic experience has been spent working in community and medical positions, specifically, as a Retail Dietitian for Hy-Vee and as a Consultant Dietitian with a number of care facilities in Iowa. Without my dietetic license, I would not have been hired for ANY of the dietitian jobs I've had and maintained throughout my career.

I am sending this message in regard to the subcommittee recommendations that were issued on August 29, 2023. I am aware that within this report is a recommendation to eliminate the Iowa Board of Dietetics. As a registered and licensed dietitian nutritionist (RDN) in Iowa, this recommendation not only impacts my ability to continue my practice but also impacts **the constitutional duty of our state government to protect its citizens**. I strongly advise against the elimination of the Board of Dietetics and our licensure for the following reasons:

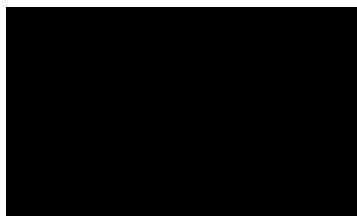
- **RDNs are specialized, highly trained healthcare professionals.** Similar to other healthcare professions with boards recommended to “continue,” RDNs must complete rigorous coursework that meets the accreditation standards within the Academy of Nutrition and Dietetics; complete a >1,000 hour supervised practicum; pass a national board examination; and take yearly continuing education.
- **RDNs are uniquely qualified to practice specialized nutrition care or Medical Nutrition Therapy.** RDNs scope of practice allows them to prescribe therapeutic diets to mitigate the effects of acute or chronic disease; to provide alternative nutrition when oral feeding is not possible or unsafe; to counsel individuals who are in need of improved nutrition; and to provide individualized nutritional guidance within the context of specific surgeries, drugs or treatments. Would you want an untrained, unlicensed professional providing that type of care for you, your child, or other loved one?
- **The Board of Dietetics protects Iowa citizens from unethical, harmful nutrition care.** The Board of Dietetics vets licensure applicants to ensure that competent, properly educated, ethically sound individuals practice as RDNs in Iowa. Applicants who have been found to be in violation of the law, derelict, impaired, or negligent in their practice, or who have engaged in practices that are not a part of the RDNs scope of practice are not granted licensure to practice in Iowa. Likewise, licensed dietitian practitioners found to be in similar violation or have not maintained continuing education requirements face sanction from this Board, with the possibility of probation or suspension of the license to practice.
- **Dietetic licensure has become THE standard requirement for employment for most of the 1100+ licensees within Iowa.** Registered Dietitians without licenses are not considered adequately credentialed for hire with healthcare organizations in Iowa. Infringement on this Board and with Dietetic Licensure would not be conducive to job creation.

- **The livelihood of many Iowa dietitians depends on licensure-required reimbursement.** Licensure provides health insurance companies and state and federal governments with the assurance that practitioners meet standards of professional competence in order to be reimbursed for providing nutrition care services. In Iowa, medical nutrition therapy and therapeutic diets are provided by Registered AND Licensed Dietitians, and it is in Iowa law that these services MUST be provided by Registered AND Licensed Dietitians for insurance payment. This comes into play at the hospital/clinic levels, as well as long-term care facilities.
- **There is no taxpayer expense associated with the Board of Dietetics.** The fees that Licensed Dietitians pay to renew their license cover all costs incurred by the department that provides oversight. This Board has proven to be cost-effective and it operates consistently in the black each year.
- **The Board of Dietetics is efficient with its meetings.** The Board of Dietetics meets quarterly, and as needed. It has held virtual meetings for several years, when appropriate.
- **The Board of Dietetics compensates its members.** The Board of Dietetics is comprised of both professional and citizen members and these Board members are provided compensation for their service to the citizens of Iowa.
- **We need licensure in Iowa in order to be part of the interstate compact that the Academy of Nutrition and Dietetics at the national level is working toward.**

I urge this subcommittee to reconsider the recommendation to eliminate the Board of Dietetics when it provides a final report to the Governor later this month.

Thank you for your consideration in this matter.

Sincerely,





Comments, BCRC <bcrccomments@iowa.gov>

Keep the Iowa AT Board

1 message

[Redacted]

Sat, Sep 16, 2023 at 5:16 PM

To: bcrccomments@iowa.gov

Members of the Board and Commission Review Committee,

My name is [Redacted] I am a licensed athletic trainer in the state of Indiana. I am writing to you with critical concerns regarding the current proposal to eliminate the Board of Athletic Training. Licensure for athletic trainers is the standard regulatory practice for health care professionals, meaning that elimination of the Board will sharply increase risk for health and safety concerns of those patients ATs serve. This ranges from minors in school sports to adults in outpatient practice and many in between. Additionally, the lack of regulation in the profession that would be caused by eliminating the Board of Athletic Training in Iowa would deter educated and qualified athletic trainers from seeking gainful employment in your state.

The members of the Board are all volunteers and qualified physicians and athletic trainers who are tasked with keeping those they serve safe. Physicians are included in this Board because athletic trainers are directly supervised by physicians, so both groups work together at all phases of practice. The Board evaluates the scope of athletic trainers in every state, checking that Iowa stays up to date with expectations and safety measures. They also handle disciplinary action when necessary and thoroughly evaluate each new athletic trainer applying to work in the state of Iowa.

All of these important duties of the board are accomplished at no cost to the state as the board is self-sustaining. I am concerned about the impact this proposal would have on the health and safety of the public as eliminating athletic training licensure would allow untrained or unqualified individuals to pose as healthcare providers. I am happy to answer any questions you may have on this critical issue, I can be reached at [Redacted]

Respectfully,

[Redacted]



Comments, BCRC <bcrccomments@iowa.gov>

Iowa board of athletic trainers

1 message

Sat, Sep 16, 2023 at 5:42 PM

To: "bcrccomments@iowa.gov" <bcrccomments@iowa.gov>

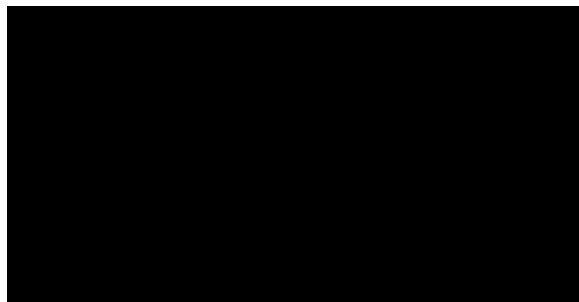
Members of the Board and Commission Review Committee,

My name is [REDACTED] I am an athletic trainer in the state of California. I am writing to you with critical concerns regarding the current proposal to eliminate the Board of Athletic Training. Licensure for athletic trainers is the standard regulatory practice for health care professionals, meaning that elimination of the Board will sharply increase risk for health and safety concerns of those patients ATs serve. This ranges from minors in school sports to adults in outpatient practice and many in between. Additionally, the lack of regulation in the profession that would be caused by eliminating the Board of Athletic Training in Iowa would deter educated and qualified athletic trainers from seeking gainful employment in your state.

The members of the Board are all volunteers and qualified physicians and athletic trainers who are tasked with keeping those they serve safe. Physicians are included in this Board because athletic trainers are directly supervised by physicians, so both groups work together at all phases of practice. The Board evaluates the scope of athletic trainers in every state, checking that Iowa stays up to date with expectations and safety measures. They also handle disciplinary action when necessary and thoroughly evaluate each new athletic trainer applying to work in the state of Iowa.

All of these important duties of the board are accomplished at no cost to the state as the board is self-sustaining. I am concerned about the impact this proposal would have on the health and safety of the public as eliminating athletic training licensure would allow untrained or unqualified individuals to pose as healthcare providers. I am happy to answer any questions you may have on this critical issue, I can be reached at [REDACTED]

Respectfully,



CONFIDENTIALITY NOTICE: This email message, including any attachments, is for the use of the intended recipient(s) only and may contain information that is privileged, confidential, and prohibited from unauthorized disclosure under applicable law. If you are not the intended recipient of this message, any dissemination, distribution, or copying of this message is strictly prohibited. If you received this message in error, please notify the sender by reply email and destroy all copies of the original message and attachments.



Please Do Not Eliminate the Board of Dietetics

1 message

Sat, Sep 16, 2023 at 6:39 PM

To: bcrccomments@iowa.gov

Dear Members of the Boards and Commissions Review Committee,

The recommendations of the Boards and Commissions Review Committee included elimination of both the Iowa Board of Dietetics and dietetic licensure. I am a member of the Iowa Academy of Nutrition and Dietetics and have been a member since we first lobbied for and received licensure back in the 1980s. Although I have retired, I was a registered licensed dietitian for over 35 years with a master's degree in nutrition and dietetics. Elimination of this Board and dietetic licensure impacts the constitutional duty of our state government to protect its citizens. I strongly advise against the elimination of the Board of Dietetics and dietetic licensure for the following reasons:

- **RDNs are specialized, highly trained healthcare professionals.** Comparable to other healthcare professions with boards which have been recommended to "continue." Registered Dietitian Nutritionists (RDNs) must complete rigorous academic course work meeting accreditation standards within the Academy of Nutrition and Dietetics; complete a >1,000 hour supervised practicum; pass a national board examination; and complete yearly continuing education.
- **RDNs are uniquely qualified to practice specialized nutrition care or Medical Nutrition Therapy (MNT).** A RDN's scope of practice includes prescribing therapeutic diets which mitigate the effects of acute or chronic disease; providing alternative nutrition when oral feeding is not possible or unsafe; counseling individuals in need of improved nutrition; and providing individualized nutritional guidance within the context of specific surgeries, drugs or treatments. Certainly no one would want an untrained, unlicensed professional providing this type of care for themselves, their children, family, or other loved ones.
- **The Board of Dietetics protects Iowa citizens from unethical, harmful nutrition care.** The Board of Dietetics vets licensure applicants to ensure competent, properly educated, ethically sound individuals practice as RDNs in Iowa. Applicants who have been found to be in violation of the law, derelict, impaired, or negligent in their practice, or who have engaged in practices which are not a part of the RDNs scope of practice are not granted licensure to practice in Iowa. Likewise, licensed dietitians found to be in similar violation or who have not maintained continuing education requirements face sanctions from this Board, with the possibility of probation or suspension of their license to practice.
- **Dietetic licensure is the standard requirement for employment for most of the 1100+ licensees within Iowa.** Registered Dietitians without licenses are not considered adequately credentialed for hire with healthcare organizations in Iowa. Elimination of both this Board and Dietetic Licensure would put the health of Iowans needing specialized nutrition care at risk, not to mention loss of jobs.
- **The livelihood of many Iowa dietitians depends on licensure-required reimbursement.** Licensure provides health insurance companies and state and federal governments with the assurance practitioners meet standards of professional competence in order to be reimbursed for providing nutrition care services. In Iowa, medical nutrition therapy and therapeutic diets are provided by Registered and Licensed Dietitians. In Iowa it is law these services must be provided by Registered and Licensed Dietitians for insurance payment. Insurance reimbursement is critical for hospital/clinic levels, as well as long-term care facilities.

- **No taxpayer expenses are associated with the Board of Dietetics.** License renewal fees cover all costs incurred by the department which provides oversight. This Board has proven to be cost-effective and consistently operates in the black.
- **The Board of Dietetics is efficient with its meetings.** The Board of Dietetics meets quarterly, and as needed. It has held virtual meetings for several years.
- **The Board of Dietetics compensates its members.** The Board of Dietetics is composed of both professional and citizen members and these Board members are provided compensation for their service to the citizens of Iowa.
- **In order to be part of the interstate compact the Academy of Nutrition and Dietetics is working toward at the national level, licensure in Iowa is necessary.**

I urge this subcommittee to reconsider the recommendation to eliminate the Board of Dietetics when it provides a final report to the Governor later this month.

Thank you for your consideration in this matter.





Comments, BCRC <bcrccomments@iowa.gov>

Athletic Training Licensure

1 message

Sat, Sep 16, 2023 at 7:00 PM

[REDACTED]
To: bcrccomments@iowa.gov

Members of the Board and Commission Review Committee,

My name is [REDACTED] I am a licensed athletic trainer in the state of Arizona. I previously worked as a licensed Athletic Trainer at Buena Vista University in Storm Lake.

I am writing to you with critical concerns regarding the current proposal to eliminate the Board of Athletic Training. Licensure for athletic trainers is the standard regulatory practice for health care professionals, meaning that elimination of the Board will sharply increase risk for health and safety concerns of those patients ATs serve. This ranges from minors in school sports to adults in outpatient practice and many in between. Additionally, the lack of regulation in the profession that would be caused by eliminating the Board of Athletic Training in Iowa would deter educated and qualified athletic trainers from seeking gainful employment in your state.

The members of the Board are all volunteers and qualified physicians and athletic trainers who are tasked with keeping those they serve safe. Physicians are included in this Board because athletic trainers are directly supervised by physicians, so both groups work together at all phases of practice. The Board evaluates the scope of athletic trainers in every state, checking that Iowa stays up to date with expectations and safety measures. They also handle disciplinary action when necessary and thoroughly evaluate each new athletic trainer applying to work in the state of Iowa.

All of these important duties of the board are accomplished at no cost to the state as the board is self-sustaining. I am concerned about the impact this proposal would have on the health and safety of the public as eliminating athletic training licensure would allow untrained or unqualified individuals to pose as healthcare providers. I am happy to answer any questions you may have on this critical issue, I can be reached at [REDACTED]

Respectfully,
[REDACTED]

continue their practice but also
to protect its citizens. We
of Dietetics and our licensure for the

care professionals.

ards recommended to "continue,"
meets the accreditation standards
complete a >1,000 hour
mination; and take yearly

alized nutrition care or

therapeutic diets to mitigate the
ernative nutrition when oral
ividuals who are in need of
nutritional guidance within the
s. Would you want an untrained,
re for you, your child, or other

from unethical, harmful

sure applicants to ensure that
ividuals practice as RDNs in
olation of the law, derelict,
who have engaged in practices that are
re not granted licensure to practice in
ers found to be in similar violation or
requirements face sanction from this
uspension of the license to practice.

standard requirement for employment

owa. Registered Dietitians without
edentialed for hire with healthcare
Board and with Dietetic Licensure

and therapeutic diets are provided by
in Iowa law that these services
ed Dietitians for insurance
clinic levels, as well as long-term

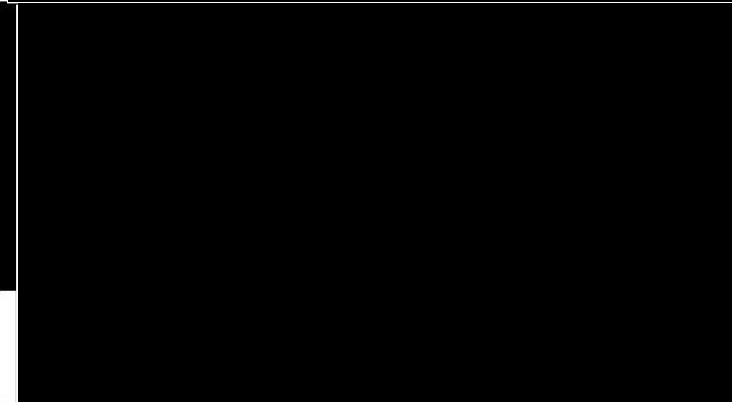
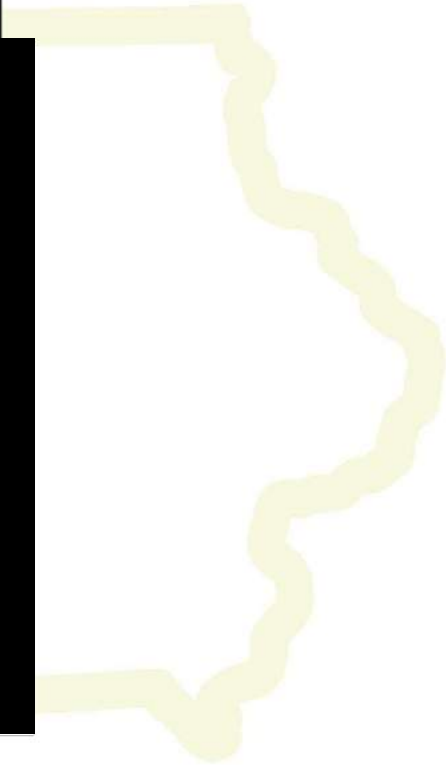
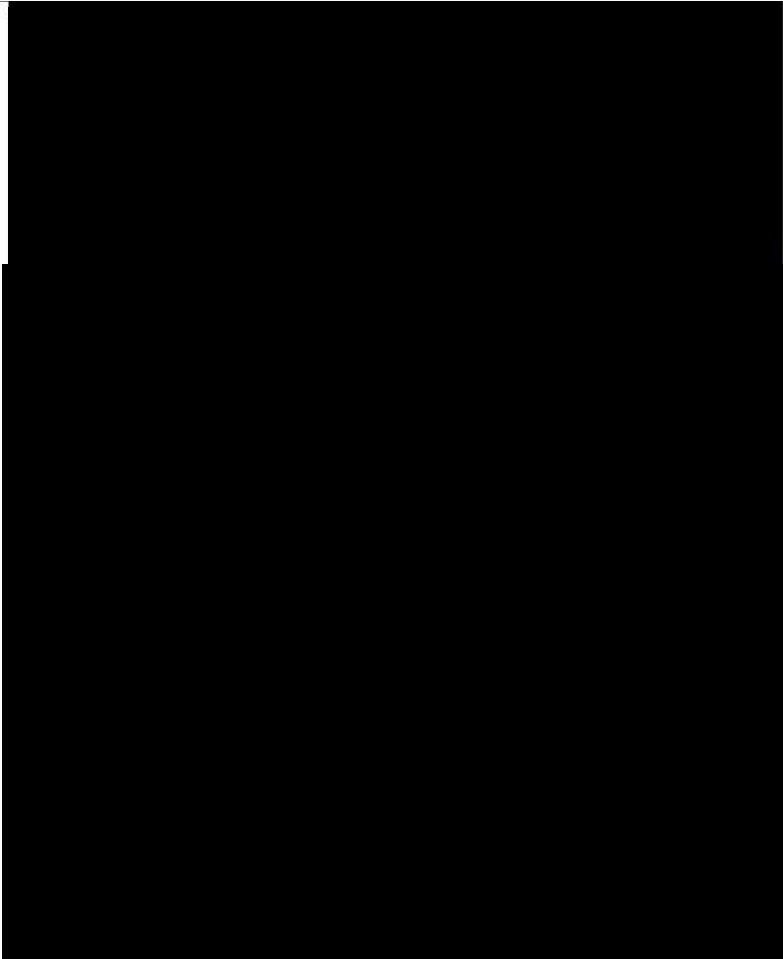
with the Board of Dietetics. The
license cover all costs incurred by
rd has proven to be
black each year.

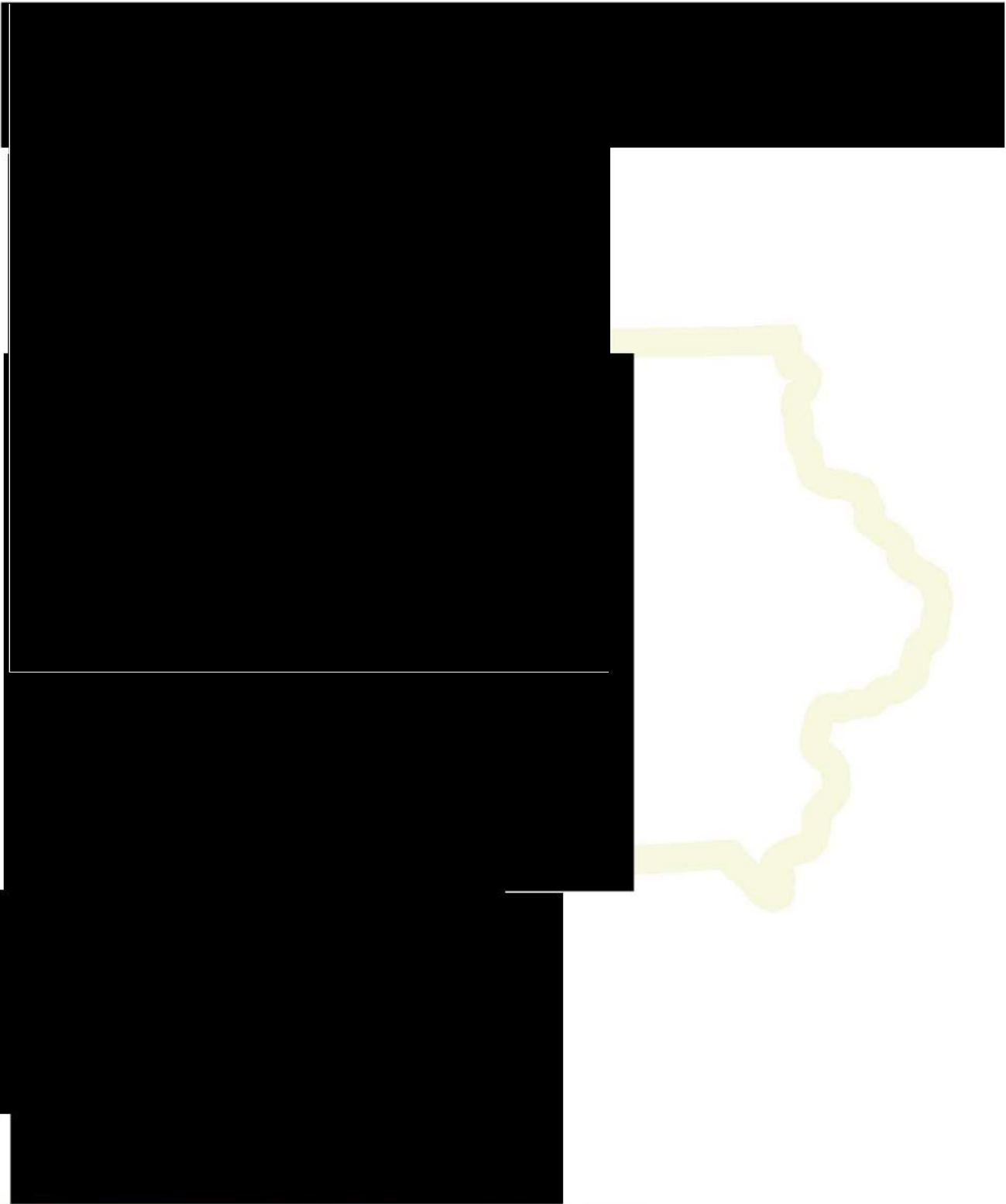
meetings. The Board of Dietetics
al meetings for several years,

members. The Board of Dietetics is
members and these Board members
e citizens of Iowa.

part of the Interstate Compact
at the national level is working

ndation to eliminate the Board of
later this month.







Comments, BCRC <bcrccomments@iowa.gov>

ATC's

1 message

Sat, Sep 16, 2023 at 7:58 PM

To: bcrccomments@iowa.gov

Members of the Board and Commission Review Committee,

My name is [REDACTED] I am a licensed athletic trainer in the state of Minnesota _____. I am writing to you with critical concerns regarding the current proposal to eliminate the Board of Athletic Training. Licensure for athletic trainers is the standard regulatory practice for health care professionals, meaning that elimination of the Board **will** sharply increase risk for health and safety concerns of those patients ATs serve. This ranges from minors in school sports to adults in outpatient practice and many in between. Additionally, the lack of regulation in the profession that would be caused by eliminating the Board of Athletic Training in Iowa would deter educated and qualified athletic trainers from seeking gainful employment in your state.

The members of the Board are all volunteers and qualified physicians and athletic trainers who are tasked with keeping those they serve safe. Physicians are included in this Board because athletic trainers are directly supervised by physicians, so both groups work together at all phases of practice. The Board evaluates the scope of athletic trainers in every state, checking that Iowa stays up to date with expectations and safety measures. **They also** handle disciplinary action when necessary and thoroughly evaluate each new athletic trainer applying to work in the state of Iowa.

All of these **important duties of the board** are accomplished at no cost to the state as the board is self-sustaining. I am concerned about the impact this proposal would have on the health and safety of the public as eliminating athletic training licensure would allow untrained or unqualified individuals to pose as healthcare providers. I am happy to answer any questions you may have on this critical issue, I can be reached at laanelsen@gmail.com _____ (enter email address here)_____.

Respectfully,

[REDACTED]



Comments, BCRC <bcrccomments@iowa.gov>

Iowa Board of Dietetics

1 message

Sun, Sep 17, 2023 at 9:10 AM

To: "bcrccomments@iowa.gov" <bcrccomments@iowa.gov>

Dear Members of the Boards and Commissions Review Committee,

I am [REDACTED] and I have been working in the field of nutrition and dietetics for over 25 years, primarily as an educator for students studying to become Registered Dietitians. I am currently the Department Chair of the Food Science and Human Nutrition Department at Iowa State University.

I am sending this message in regard to the subcommittee recommendations that were issued on August 29, 2023. I am aware that within this report is a recommendation to eliminate the Iowa Board of Dietetics. As a registered and licensed dietitian nutritionist (RDN) in Iowa, this recommendation not only impacts my ability to continue my practice but also impacts **the constitutional duty of our state government to protect its citizens**. I strongly advise against the elimination of the Board of Dietetics and our licensure for the following reasons:

- **RDNs are specialized, highly trained healthcare professionals.** Similar to other healthcare professions with boards recommended to "continue," RDNs must complete rigorous coursework that meets the accreditation standards within the Academy of Nutrition and Dietetics; complete a >1,000 hour supervised practicum; pass a national board examination; and take yearly continuing education.
- **RDNs are uniquely qualified to practice specialized nutrition care or Medical Nutrition Therapy.** RDNs scope of practice allows them to prescribe therapeutic diets to mitigate the effects of acute or chronic disease; to provide alternative nutrition when oral feeding is not possible or unsafe; to counsel individuals who are in need of improved nutrition; and to provide individualized nutritional guidance within the context of specific surgeries, drugs or treatments. Would you want an untrained, unlicensed professional providing that type of care for you, your child, or other loved one?
- **The Board of Dietetics protects Iowa citizens from unethical, harmful nutrition care.** The Board of Dietetics vets licensure applicants to ensure that competent, properly educated, ethically sound individuals practice as RDNs in Iowa. Applicants who have been found to be in violation of the law, derelict, impaired, or negligent in their practice, or who have engaged in practices that are not a part of the RDNs scope of practice are not granted licensure to practice in Iowa. Likewise, licensed dietitian practitioners found to be in similar violation or have not maintained continuing education requirements face sanction from this Board, with the possibility of probation or suspension of the license to practice.
- **Dietetic licensure has become THE standard requirement for employment for most of the 1100+ licensees within Iowa.** Registered Dietitians without licenses are not considered adequately credentialed for hire with healthcare organizations in Iowa. Infringement on this Board and with Dietetic Licensure would not be conducive to job creation.
- **The livelihood of many Iowa dietitians depends on licensure-required reimbursement.** Licensure provides health insurance companies and state and federal governments with the assurance that practitioners meet standards of professional competence in order to be

reimbursed for providing nutrition care services. In Iowa, medical nutrition therapy and therapeutic diets are provided by Registered AND Licensed Dietitians, and it is in Iowa law that these services MUST be provided by Registered AND Licensed Dietitians for insurance payment. This comes into play at the hospital/clinic levels, as well as long-term care facilities.

- **There is no taxpayer expense associated with the Board of Dietetics.** The fees that Licensed Dietitians pay to renew their license cover all costs incurred by the department that provides oversight. This Board has proven to be cost-effective and it operates consistently in the black each year.
- **The Board of Dietetics is efficient with its meetings.** The Board of Dietetics meets quarterly, and as needed. It has held virtual meetings for several years, when appropriate.
- **The Board of Dietetics compensates its members.** The Board of Dietetics is comprised of both professional and citizen members and these Board members are provided compensation for their service to the citizens of Iowa.
- **We need licensure in Iowa in order to be part of the interstate compact that the Academy of Nutrition and Dietetics at the national level is working toward.**

I urge this subcommittee to reconsider the recommendation to eliminate the Board of Dietetics when it provides a final report to the Governor later this month.

Thank you for your consideration in this matter.

Sincerely,





Date: 9/17/2023

Dear State of Iowa Board & Commissions Review Committee

As a member of the American Physical Therapy Association Iowa Chapter (APTA Iowa), I send this letter as someone who resides in your respective districts to inform you that APTA Iowa has concerns with the combination of several licensure boards recommended by the Committee. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with multiple other professions could lead to reduced oversight and peer review, and ultimately could produce harm to the public.

Additionally, the membership as proposed may deter the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified professionals to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board of physical therapy is unlikely, we request your consideration of combining the profession with similar health care providers, for example – continuing the current licensure board representation with occupational therapists and adding speech pathology and audiology, while removing chiropractors and massage therapists as proposed. A combined board of therapy providers will allow for fewer conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers. There are greater conflicts between the scope of practice for massage therapists, chiropractors, and physical therapists, which could lead to substantial regulatory issues as noted above.

As a constituent who works in the educational realm of the physical therapy profession, I regularly educate new physical therapists about scope of practice, licensure board expectations/requirements, and interprofessional practice. It would be beneficial to continue to protect the public by maintaining a consistent scope of practice across professions in both the legislative and regulatory environments.

Your consideration is appreciated.

Respectfully,

[Redacted signature]



Comments, BCRC <bcrccomments@iowa.gov>

Iowa Athletic Trainers

1 message

[Redacted]

Sun, Sep 17, 2023 at 2:10 PM

To: bcrccomments@iowa.gov

Members of the Board and Commission Review Committee,

My name is [Redacted] I am a licensed athletic trainer in the state of New Mexico. I am writing to you with critical concerns regarding the current proposal to eliminate the Board of Athletic Training. Licensure for athletic trainers is the standard regulatory practice for health care professionals, meaning that elimination of the Board will sharply increase risk for health and safety concerns of those patients ATs serve. This ranges from minors in school sports to adults in outpatient practice and many in between. Additionally, the lack of regulation in the profession that would be caused by eliminating the Board of Athletic Training in Iowa would deter educated and qualified athletic trainers from seeking gainful employment in your state.

The members of the Board are all volunteers and qualified physicians and athletic trainers who are tasked with keeping those they serve safe. Physicians are included in this Board because athletic trainers are directly supervised by physicians, so both groups work together at all phases of practice. The Board evaluates the scope of athletic trainers in every state, checking that Iowa stays up to date with expectations and safety measures. They also handle disciplinary action when necessary and thoroughly evaluate each new athletic trainer applying to work in the state of Iowa.

All of these important duties of the board are accomplished at no cost to the state as the board is self-sustaining. I am concerned about the impact this proposal would have on the health and safety of the public as eliminating athletic training licensure would allow untrained or unqualified individuals to pose as healthcare providers. I am happy to answer any questions you may have on this critical issue, I can be reached at mirandazamora92@gmail.com.

Respectfully,

--
[Redacted Signature]



Iowa Boards and Commissions Review Committee
Iowa State Capitol
1007 E Grand Ave
Des Moines, IA 50319

September 17, 2023

Committee Members,

The Iowa Pharmacy Association (“IPA”), established in 1880 and representing over 2,500 pharmacists, pharmacy technicians, student pharmacists, and pharmacy owners, serves the pharmacy profession to improve the health of our communities.

IPA commends the Committee for their efforts. To ensure the realignment improves efficiencies, cost savings, and quality of service, IPA respectfully submits the following, regarding the Iowa Board of Pharmacy:

The Iowa Board of Pharmacy provides responsive, efficient, and quality administrative services in its effort to ensure patient safety and regulate the profession of pharmacy.

IPA places the highest priority on the safety and well-being of Iowans, and we believe maintaining a strong, focused, and expert Board of Pharmacy is essential to ensuring the continued protection of public safety in matters related to pharmacy practice.

Specifically, we request the following strengths of the Board of Pharmacy be maintained:

1. **Maintaining Pharmacy Subject Matter Expertise:** The Iowa Board of Pharmacy benefits from the specialized knowledge and expertise of pharmacists. Any restructuring must ensure this expertise remains an integral part of the Board to effectively regulate pharmacy practice in the state. IPA strongly supports the Board’s Executive Director and Compliance Officers to be licensed pharmacists.
2. **Retaining a Pharmacy Focus:** IPA believes the independence of the Iowa Board of Pharmacy is crucial to its ability to serve as an effective regulatory body over the pharmacy profession and prescription drug distribution supply chain. The Iowa Board of Pharmacy provides education to the profession to ensure compliance. States with consolidated boards do not provide the same educational effectiveness. IPA strongly supports retaining a pharmacy focused regulatory board to ensure the public health and safety of Iowans.
3. **Providing Adequate Tools and Independence for Exemplary Oversight:** The Iowa Board of Pharmacy must possess the necessary tools and independence to fulfill its mission of providing exemplary oversight to protect the public. IPA seeks to ensure the same quality and quantity of services remain available through the alignment process.

Advancing patient health through communication, education and innovation.

8515 Douglas Ave, Suite 16 • Des Moines, IA 50322 • 515.270.0713 • Fax: 515.270.2979
Website: www.iarx.org • E-mail: ipa@iarx.org

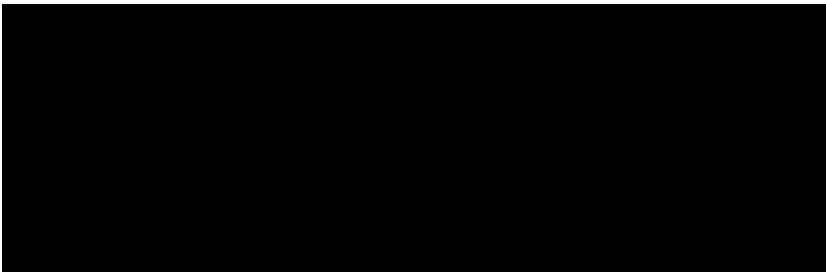


IPA recognizes the importance of streamlining government processes and reducing redundancies. We urge the Committee to consider potential consequences on public safety and the effectiveness of pharmacy regulation in Iowa. A balanced approach can be achieved—one that respects the distinct nature of pharmacy practice and the prescription drug supply chain while still pursuing efficiency in government operations.

IPA is committed to working collaboratively and we welcome the opportunity to engage in further dialogue and provide any assistance that may be helpful during this process.

Thank you for your time and consideration.

Sincerely,



To: Boards and Commissions Review Committee via email (BCRCcomments@iowa.gov)
CC: Madeline Wilcox, Legislative Liaison

Advancing patient health through communication, education and innovation.

8515 Douglas Ave, Suite 16 • Des Moines, IA 50322 • 515.270.0713 • Fax: 515.270.2979
Website: www.iarx.org • E-mail: ipa@iarx.org



Comments, BCRC <bcrccomments@iowa.gov>

Iowa Athletic Training Licensure

1 message

[Redacted]
To: bcrccomments@iowa.gov

Sun, Sep 17, 2023 at 2:34 PM

Members of the Board and Commission Review Committee,

My name is [Redacted] I am a licensed athletic trainer in the state of Wisconsin. I am writing to you with critical concerns regarding the current proposal to eliminate the Board of Athletic Training. Licensure for athletic trainers is the standard regulatory practice for health care professionals, meaning that elimination of the Board will sharply increase risk for health and safety concerns of those patients ATs serve. This ranges from minors in school sports to adults in outpatient practice and many in between. Additionally, the lack of regulation in the profession that would be caused by eliminating the Board of Athletic Training in Iowa would deter educated and qualified athletic trainers from seeking gainful employment in your state.

The members of the Board are all volunteers and qualified physicians and athletic trainers who are tasked with keeping those they serve safe. Physicians are included in this Board because athletic trainers are directly supervised by physicians, so both groups work together at all phases of practice. The Board evaluates the scope of athletic trainers in every state, checking that Iowa stays up to date with expectations and safety measures. They also handle disciplinary action when necessary and thoroughly evaluate each new athletic trainer applying to work in the state of Iowa.

All of these important duties of the board are accomplished at no cost to the state as the board is self-sustaining. I am concerned about the impact this proposal would have on the health and safety of the public as eliminating athletic training licensure would allow untrained or unqualified individuals to pose as healthcare providers. I am happy to answer any questions you may have on this critical issue, I can be reached at [Redacted]

Respectfully,

[Redacted]



Making Better Lives.
Rock Valley
PHYSICAL THERAPY

Iowa Boards and Commissions Review Committee
bcrcomments@iowa.gov

Date: September 14, 2023

RE: Physical Therapist Concerns

Dear Legislators,

I am an owner in Rock Valley Physical Therapy. Rock Valley Physical Therapy has 26 owner/partners and 546 employees. We are a private practice with 44 different locations in the state of Iowa. This issue is very important to our company because we are very invested in providing care for our patients, your constituents in Iowa.

I have concerns with the combination of several licensure boards recommended by the Committee. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,





Dear Boards and Commissions Review Committee:

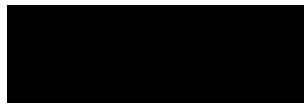
Please find below a copy of written remarks delivered at the September 6th public meeting.

My name is [REDACTED] and I am Executive Director of the Central Iowa Building & Construction Trades Council. We are made up of 16 craft labor organizations representing more than 15,000 men and women who work for employers across the state. This includes licensed electricians & apprentices, licensed plumbers & apprentices, boilermakers, elevator constructors, and so on. We are here today because we are opposed to the elimination of the Boiler & Elevator Safety Boards and opposed to any merger or consolidation of the Plumbing & Electrical Boards.

On the Plumbing and Electrical Boards, the members of these boards are qualified experts tasked with decision-making when it comes to the codes that govern their own craft and the licensing that ensures that only qualified, trained tradespeople perform the work. Their expertise and background make them uniquely qualified to pass judgment on the matters before them on their own craft and any merging or consolidation of their responsibilities with others would dilute their effectiveness and could result in conflict, confusion, and reduced public confidence.

If I had more than two minutes, I would share with you studies that have confirmed that proper oversight, similar boards, and licensing in these industries have saved lives and improved outcomes. I could also share news headlines with horror stories about boilers exploding because they went unmaintained and uninspected, or a story I literally read this morning where five people were just killed when an elevator at a famous Bali resort failed. This elevator had only one cable and no emergency brakes, which are dangers that diligent boards like ours investigate. Or medical gas, a sublicense under the Plumbing Board, which is the piping that provides oxygen and other gases to surgery centers, emergency rooms, doctors offices and vet clinics. There are stories where unlicensed, unqualified plumbers have done this work causing lines to be crossed or contaminated, or leaks or failures occur, resulting in death. Boards play a critical role in making sure tradespeople are licensed and properly trained. They ensure codes are working and evolving, and that we protect workers and public. **I can't believe that I heard a recommendation earlier that we could simply rely on online reviews or Yelp!**

I am a licensed attorney, and while it doesn't appear that the recommendation is to merge my governing board with the boards we are discussing, just know that these trades boards represent similar levels of intelligence, diligence, and importance with respect to their unique industries. On behalf of the hardworking Iowans that work in these industries, please keep the Boards in place as-is and prioritize licensing, inspection, and maintenance in these critical industries to ensure the safety and wellbeing of the public. Thank you.





Comments, BCRC <bcrccomments@iowa.gov>

ASHRAE Iowa Chapter comments on State Boards and Commissions

1 message

Mon, Sep 18, 2023 at 8:11 AM

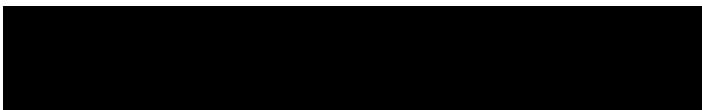
To: "BCRCcomments@iowa.gov" <BCRCcomments@iowa.gov>

Cc: [REDACTED]

The Iowa Chapter of ASHRAE is a non-profit professional organization representing over 300 professionals in the Heating, Ventilating, Refrigerating, and Air Conditioning industry. As such, we have a particular interest in several state boards and commissions. Reviewing the Committee's initial recommendations, we would like to note the following:

1. State Building Code Advisory Council (BCID #13, recommended for Elimination): The Advisory Council plays an important role in ensuring the safety, resilience, efficiency, and cost-effectiveness of construction in Iowa. It consists of people with expertise in construction and has a critical role in advising the Building Codes Commissioner regarding adoption of model building codes. This includes consulting on amendments to the model codes, which helps to customize them to the particular concerns of stakeholders in our state. If this Council is eliminated, we are concerned that the building code adoption process could be stalled, or that future model codes could be adopted without input from building professionals.
2. Boiler and Pressure Vessel Board (BCID #12, recommended for Elimination): This board was created to provide oversight for the state boiler inspector's office, and to have a panel of experts to review variance requests. We are concerned that, without this body, there will be no recourse for building owners and contractors that have reasonable requests for variances, and this could lead to untenable costs for owners of public assembly buildings such as churches, school districts, and healthcare facilities.
3. Engineering and Land Surveying Examining Board (BCID #23, recommended for Reorganization/Other Changes): As a large number of our members hold Professional Engineering (P.E.) licenses in the state, this board is critical to our profession, along with all other P.E. candidates and licensees in our state. Our main concern with any changes to this board would be to ensure that it does not create any undue delays or complications in the P.E. certification and renewal process.

We understand that updating and streamlining the Boards and Commissions is a substantial task, and we greatly appreciate the Committee's dedication to the process. We would like to offer our input and expertise in the process, and welcome the Committee to contact us for consultation on these matters. Thank you for your time and attention.





Comments, BCRC <bcrccomments@iowa.gov>

American Occupational Therapy Association Iowa Chapter Concerns

1 message

Mon, Sep 18, 2023 at 8:25 AM

To: "bcrccomments@iowa.gov" <bcrccomments@iowa.gov>

Date: September 18, 2023

RE: American Occupational Therapy Association Iowa Chapter Concerns

Dear Committee Members,

On behalf of the American Occupational Therapy Association Iowa Chapter members (IOTA), we send this letter to inform the Boards and Commissions Review Committee that IOTA Iowa has concerns with the combination of several licensure boards recommended by the Committee. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical and occupational therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Occupational Therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of occupational therapy. Independent boards of occupational therapy provide oversight by maintaining peer and public members on the board. By allowing occupational therapists to oversee the regulation of occupational therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate occupational therapy and could have interests that conflict with or limit the practice of occupational therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with physical therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,





Date: September 18, 2023

Dear Senator Trone Garriott and Representative Judge,

As a member of the American Physical Therapy Association Iowa Chapter (APTA Iowa), I send this letter as someone who resides in your district to inform you that APTA Iowa has concerns with the combination of several licensure boards recommended by the Committee. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, I request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

As a provider who utilizes dry needling as a component of my practice, I am worried that with the proposed board changes could jeopardize my ability to continue to utilize this skill. A skill that I have undergone additional training to obtain a certification to practice. If other health care professionals are placed in charge of regulating physical therapist's practice, I worry that this could affect this specific ability and a whole host of other practice scope items.

Your consideration is appreciated.

Respectfully,

[Redacted signature]



Comments, BCRC <bcrccomments@iowa.gov>

Urgent Concerns Regarding Proposed Elimination of Athletic Trainer Board in Iowa

1 message

[Redacted]

Mon, Sep 18, 2023 at 9:12 AM

To: bcrccomments@iowa.gov

Dear Members of the Board and Commission Review Committee,

I have been a certified and licensed athletic trainer in Virginia for 15 years. I'm writing to express serious concerns about the proposal to eliminate the Board of Athletic Training in Iowa.

Athletic trainer licensure is a crucial safeguard for public health. Removing the Board would increase the risk to patients, from school sports to outpatient care. Moreover, this change could deter qualified athletic trainers from seeking employment in Iowa.

The Board consists of dedicated volunteers, including qualified physicians and athletic trainers, who ensure public safety. Physicians' involvement is essential as they supervise athletic trainers. The Board evaluates practice standards, handles disciplinary matters, and reviews new athletic trainer applications—all at no cost to the state.

Eliminating licensure may allow unqualified individuals to pose as healthcare providers, jeopardizing public health. Please reconsider this proposal immediately, while looking to other states in the United States who appropriately license athletic trainers as medical professionals.

Sincerely,

[Redacted Signature]



Comments, BCRC <bcrccomments@iowa.gov>

AT licensure in Iowa

1 message

[REDACTED]
To: bcrccomments@iowa.gov

Mon, Sep 18, 2023 at 9:21 AM

Hello,

My name is [REDACTED], I am a licensed athletic trainer (AT) and physical therapist (PT) in the state of Virginia. I am writing to you with critical concerns regarding the current proposal to eliminate the Board of Athletic Training. The American Medical Association recognized AT's as allied health care professionals in 1990 and that has helped lead to licensure for AT's in all but 2 states. This means that licensure for athletic trainers is the standard regulatory practice across the nation, as it should be for all allied health professionals. The elimination of the Board in your state will sharply increase risk for health and safety concerns of those patients ATs serve. This ranges from minors in school sports to adults in outpatient practice and many in between. If AT's are no longer licensed that will lead to other unqualified individuals from acting as an athletic trainer. This will obviously lead to increased risk to the patients they serve while drastically increasing the risk of liability for the state of Iowa. Additionally, the lack of regulation in the profession that would be caused by eliminating the Board of Athletic Training in Iowa would deter educated and qualified athletic trainers from seeking gainful employment in your state.

The members of the Board are all volunteers and qualified physicians and athletic trainers who are tasked with keeping those they serve safe. Physicians are included in this Board because athletic trainers are directly supervised by physicians, so both groups work together at all phases of practice. The Board evaluates the scope of athletic trainers in every state, checking that Iowa stays up to date with expectations and safety measures. They also handle disciplinary action when necessary and thoroughly evaluate each new athletic trainer applying to work in the state of Iowa.

All of these important duties of the board are accomplished at no cost to the state as the board is self-sustaining. I am concerned about the impact this proposal would have on the health and safety of the public as eliminating athletic training licensure would allow untrained or unqualified individuals to pose as healthcare providers. I am happy to answer any questions you may have on this critical issue, I can be reached by email, or my cell at [REDACTED]. I hope that you will consider the health and safety of the patients AT's serve and maintain state licensure for AT's in Iowa.

Respectfully,

[REDACTED]



Comments, BCRC <bcrccomments@iowa.gov>

BCRC license merger

1 message

Mon, Sep 18, 2023 at 9:37 AM

To: "BCRCcomments@iowa.gov" <BCRCcomments@iowa.gov>

As an experienced journeyman with 35 years' experience and owner of a mechanical company providing installation and service for plumbing, hvac and boilers. We oppose the mergers of plumbing and electrical boards and eliminating boiler safety board. Over my years in the trade I have witnessed hazardous conditions created by under trained and inexperienced technicians and installers as we were called in to get systems operating correctly, many of these situations can end tragically if proper inspections are not made by qualified inspectors . Since Iowa started the statewide licensing we have noticed safer and better quality installs. In my professional opinion the state should be building upon these boards for the safety of the community such as schools and all buildings used for public gathering rather than condensing them down.

We do a lot of work in central Iowa with the municipalities that have combined inspectors and several that have an inspector specialized for each trade. On the combined inspections we have seen safety items get missed as opposed to the inspections trade specific.

I'm always available if you would like further input.



CONFIDENTIALITY NOTICE: This communication, together with any attachments hereto or links contained herein, is for the sole use of the intended recipient(s) and may contain information that is confidential or legally protected. If you are not the intended recipient, you are hereby notified that any review, disclosure, copying, dissemination, distribution or use of this communication is STRICTLY PROHIBITED. If you have received this communication in error, please notify Excel Mechanical Co., Inc. immediately by return e-mail message and delete the original and all copies of the communication, along with any attachments hereto or links herein, from your system. Excel Mechanical Co., Inc. cannot accept liability for the contents of the message. Thank you



Comments, BCRC <bcrccomments@iowa.gov>

Athletic Training Profession

1 message

Mon, Sep 18, 2023 at 10:17 AM

To: bcrccomments@iowa.gov

Members of the Board and Commission Review Committee,

My name is [REDACTED], I am a licensed athletic trainer in the state of Virginia. I am writing to you with critical concerns regarding the current proposal to eliminate the Board of Athletic Training. Licensure for athletic trainers is the standard regulatory practice for health care professionals, meaning that elimination of the Board will sharply increase risk for health and safety concerns of those patients ATs serve. This ranges from minors in school sports to adults in outpatient practice and many in between. Additionally, the lack of regulation in the profession that would be caused by eliminating the Board of Athletic Training in Iowa would deter educated and qualified athletic trainers from seeking gainful employment in your state.

The members of the Board are all volunteers and qualified physicians and athletic trainers who are tasked with keeping those they serve safe. Physicians are included in this Board because athletic trainers are directly supervised by physicians, so both groups work together at all phases of practice. The Board evaluates the scope of athletic trainers in every state, checking that Iowa stays up to date with expectations and safety measures. They also handle disciplinary action when necessary and thoroughly evaluate each new athletic trainer applying to work in the state of Iowa.

All of these important duties of the board are accomplished at no cost to the state as the board is self-sustaining. I am concerned about the impact this proposal would have on the health and safety of the public as eliminating athletic training licensure would allow untrained or unqualified individuals to pose as healthcare providers. I am happy to answer any questions you may have on this critical issue.

Respectfully,

[REDACTED]



Comments, BCRC <bcrccomments@iowa.gov>

Over Site Boards

1 message

[Redacted]

Mon, Sep 18, 2023 at 11:11 AM

To: BCRCcomments@iowa.gov

Licensing standards in Iowa for each trade and profession are unique to the skills required in that trade or profession. Plumbers/Mechanical are one of two building trade occupations licensed in the Iowa Code under Chapter 105. Electricians being the other in Chapter 103. Eliminating local stakeholders input will put Iowans at risk by jeopardizing public safety. In respect for licensed occupations the state of Iowa should not merge or change the current makeup of their respected boards.

[Redacted]



Comments, BCRC <bcrccomments@iowa.gov>

RT-Letter to the state house

1 message

Mon, Sep 18, 2023 at 11:24 AM

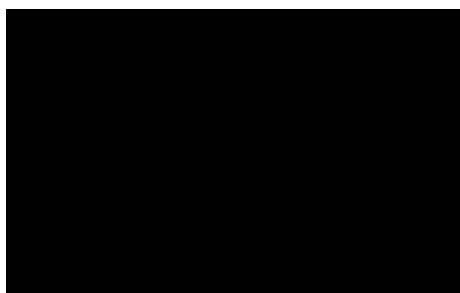
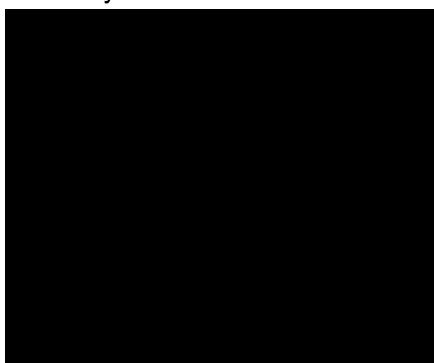
To: "bcrccomments@iowa.gov" <bcrccomments@iowa.gov>

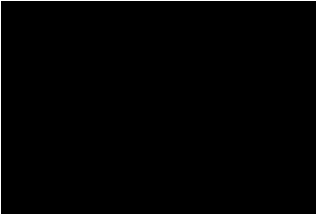
"My name is [REDACTED] I am a Respiratory Therapist in the state of Iowa. I am voicing concern about the merging of the Respiratory Therapy and Polysomnography licensure board. Respiratory therapists care for individuals that have trouble breathing such as traumas, premature birth, critical illnesses, COPD, and asthma to name a few. We have been vital in the care and treatment of individuals with COVID-19 and RSV. We work under the direction of physicians. For the safety of patients, it is important that we join healthcare professionals that serve like patients.

When the merger occurs, we need a voice on the merged board to continue to assess competency for those practicing respiratory therapy and provide safe and effective respiratory care. We currently have 4 seats on the board, and we need to maintain these voices in a similar ratio. Given the possible list of medical boards, it seems fitting that we would fall under the board of medicine. Physicians are familiar with respiratory care, and we work in similar environments.

If consolidation/merge is what is needed, I strongly urge you to maintain the voice of Respiratory Therapy on a newly merged board, suggesting the board of medicine."

Thank you.





Confidentiality Notice:

This e-mail, including any attachments is the property of Trinity Health and is intended for the sole use of the intended recipient(s). It may contain information that is privileged and confidential. Any unauthorized review, use, disclosure, or distribution is prohibited. If you are not the intended recipient, please delete this message, and reply to the sender regarding the error in a separate email.



Comments, BCRC <bcrccomments@iowa.gov>

APTA

1 message

[Redacted]

Mon, Sep 18, 2023 at 1:05 PM

To: bcrccomments@iowa.gov

Dear Committee Members,

On behalf of the American Physical Therapy Association Iowa Chapter members (APTA Iowa), we send this letter to inform the Boards and Commissions Review Committee that APTA Iowa has concerns with the combination of several licensure boards recommended by the Committee. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.
Respectfully,

--
[Redacted Signature]



Comments, BCRC <bcrccomments@iowa.gov>

Licensure Board

1 message

Mon, Sep 18, 2023 at 2:13 PM


to: bcrccomments@iowa.gov

As a member of the APTA Iowa and a licensed physical therapist in Iowa, I am opposed to the proposed combining or chiropractors, massage therapists, physical therapists, and occupational therapists into the same licensure board. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,





Comments, BCRC <bcrccomments@iowa.gov>

Licensure Board

1 message

[Redacted]

Mon, Sep 18, 2023 at 2:29 PM

To: bcrccomments@iowa.gov

Dear Committee Members,

As a member of the APTA Iowa and a licensed physical therapist assistant in Iowa, I am opposed to the proposed combining of chiropractors, massage therapists, physical therapists, and occupational therapists into the same licensure board. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,

[Redacted Signature]



Comments, BCRC <bcrccomments@iowa.gov>

Proposed Elimination of Dietetics Board

1 message

Mon, Sep 18, 2023 at 9:24 PM

To: BCRCcomments@iowa.gov

Dear Members of the Boards and Commissions Review Committee,

My name is [REDACTED] and I am a Registered and Licensed Dietitian in the state of Iowa. I work at the Waukee Community School District as a Registered Dietitian, where I provide support to families with students who have special dietary needs, plan menus for all of our preschool to 12th grade buildings, coordinate our Farm to School programming, ensure compliance with our local wellness policy, and provide oversight of our summer foodservice (Picnic and Play) program.

In my daily practice, I work with students and families who are experiencing a wide variety of health needs, from Celiac disease to dysphagia to autism, that require modifications of their meals at school. My training and scope of practice as a dietitian uniquely qualifies me to be an ancillary part of a student's care team by providing menus that meet their specific dietary needs to provide them safe, supported, and comfortable meals at school. While I am not diagnosing a student with their disease state in a health care environment, my training and expertise in nutrition and dietetics has given me the skills to critically analyze nutrition and ingredient labels to identify allergens/ingredients of concern and be able to select viable substitutions for a student that avoid the ingredients they must avoid and provide them a meal that is as close to their peers as possible.

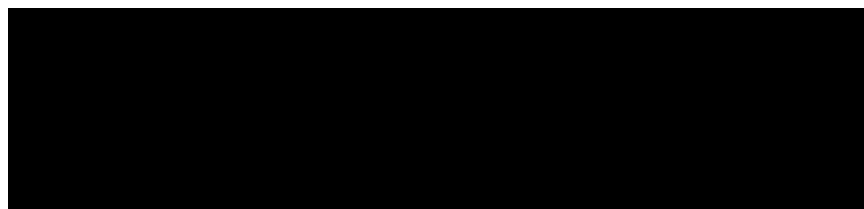
I am sending this message in regard to the subcommittee recommendations that were issued on August 29, 2023. I am aware that within this report is a recommendation to eliminate the Iowa Board of Dietetics. As a registered and licensed dietitian nutritionist (RDN) in Iowa, this recommendation not only impacts my ability to continue my practice at a high level but also impacts the constitutional duty of our state government to protect its citizens. **I strongly advise against the elimination of the Board of Dietetics and our licensure for the following reasons:**

- **RDNs are specialized, highly trained healthcare professionals.** Similar to other healthcare professions with boards recommended to "continue," RDNs must complete rigorous coursework that meets the accreditation standards within the Academy of Nutrition and Dietetics; complete a >1,000 hour supervised practicum; pass a national board examination; and take yearly continuing education.
- **RDNs are uniquely qualified to practice specialized nutrition care or Medical Nutrition Therapy.** RDNs scope of practice allows them to prescribe therapeutic diets to mitigate the effects of acute or chronic disease; to provide alternative nutrition when oral feeding is not possible or unsafe; to counsel individuals who are in need of improved nutrition; and to provide individualized nutritional guidance within the context of specific surgeries, drugs or treatments. *Would you want an untrained, unlicensed professional providing that type of care for you, your child, or other loved one?*
- **The Board of Dietetics protects Iowa citizens from unethical, harmful nutrition care.** The Board of Dietetics vets licensure applicants to ensure that competent, properly educated, ethically sound individuals practice as RDNs in Iowa. Applicants who have been found to be in violation of the law, derelict, impaired, or negligent in their practice, or who have engaged in practices that are not a part of the RDNs scope of practice are not granted licensure to practice in Iowa. Likewise, licensed dietitian practitioners found to be in similar violation or have not maintained continuing education requirements face sanction from this Board, with the possibility of probation or suspension of the license to practice.

- **Dietetic licensure has become THE standard requirement for employment for most of the 1100+ licensees within Iowa.** Registered Dietitians without licenses are not considered adequately credentialed for hire with healthcare organizations in Iowa. Infringement on this Board and with Dietetic Licensure would not be conducive to job creation.
- **The livelihood of many Iowa dietitians depends on licensure-required reimbursement.** Licensure provides health insurance companies and state and federal governments with the assurance that practitioners meet standards of professional competence in order to be reimbursed for providing nutrition care services. In Iowa, medical nutrition therapy and therapeutic diets are provided by Registered AND Licensed Dietitians, and it is in Iowa law that these services MUST be provided by Registered AND Licensed Dietitians for insurance payment. This comes into play at the hospital/clinic levels, as well as long-term care facilities.
- **There is no taxpayer expense associated with the Board of Dietetics.** The fees that Licensed Dietitians pay to renew their license cover all costs incurred by the department that provides oversight. This Board has proven to be cost-effective and it operates consistently in the black each year.
- **The Board of Dietetics is efficient with its meetings.** The Board of Dietetics meets quarterly, and as needed. It has held virtual meetings for several years, when appropriate.
- **The Board of Dietetics compensates its members.** The Board of Dietetics is comprised of both professional and citizen members and these Board members are provided compensation for their service to the citizens of Iowa.
- **We need licensure in Iowa in order to be part of the interstate compact that the Academy of Nutrition and Dietetics at the national level is working toward.** Once the compact becomes available, this will entice dietitians to live and work in the state of Iowa and expand opportunities for dietitians who live here to pursue opportunities, such as telehealth.

I urge this subcommittee to reconsider the recommendation to eliminate the Board of Dietetics when it provides a final report to the Governor later this month. If you have further questions about dietitians or our profession, I ask that you reach out to seek more information. I am incredibly passionate about my career path and welcome questions.

Thank you for your consideration in this matter.





Comments, BCRC <bcrccomments@iowa.gov>

Opposition to combining licensure boards

1 message

[Redacted]

Tue, Sep 19, 2023 at 8:05 AM

To: bcrccomments@iowa.gov

Dear Committee Members,

As a member of the APTA Iowa and a licensed physical therapist in Iowa, I am opposed to the proposed combining of chiropractors, massage therapists, physical therapists, and occupational therapists into the same licensure board. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,

--

[Redacted signature block]



Comments, BCRC <bcrccomments@iowa.gov>

RE: American Physical Therapy Association Iowa Chapter Concerns

1 message

[Redacted]

Tue, Sep 19, 2023 at 8:34 AM

To: bcrccomments@iowa.gov

Iowa Boards and Commissions Review Committee bcrccomments@iowa.gov Date: September 19, 2023

RE: American Physical Therapy Association Iowa Chapter Concerns

Dear Committee Members,

On behalf of the American Physical Therapy Association Iowa Chapter members (APTA Iowa), we send this letter to inform the Boards and Commissions Review Committee that APTA Iowa has concerns with the combination of several licensure boards recommended by the Committee. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues. The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public. Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation. Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy. While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers. We appreciate your consideration.

Respectfully,

[Redacted Signature]



Comments, BCRC <bcrccomments@iowa.gov>

Physical Therapy Board

1 message

To: bcrccomments@iowa.gov

Tue, Sep 19, 2023 at 9:56 AM

Dear Committee Members,

As a member of the APTA Iowa and a licensed physical therapist in Iowa, I am opposed to the proposed combining of chiropractors, massage therapists, physical therapists, and occupational therapists into the same licensure board. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,





Comments, BCRC <bcrccomments@iowa.gov>

Licensure Board

1 message

Tue, Sep 19, 2023 at 10:06 AM

To: bcrccomments@iowa.gov

Dear Committee Members,

As a member of the APTA Iowa and a licensed physical therapist in Iowa, I am opposed to the proposed combining of chiropractors, massage therapists, physical therapists, and occupational therapists into the same licensure board. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,





Comments, BCRC <bcrccomments@iowa.gov>

(no subject)

1 message

Tue, Sep 19, 2023 at 2:36 PM

To: bcrccomments@iowa.gov

Dear Committee Members,

As a member of the APTA Iowa and a licensed physical therapist in Iowa, I am opposed to the proposed combining of chiropractors, massage therapists, physical therapists, and occupational therapists into the same licensure board. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,

A black rectangular redaction box covering the signature of the sender.



Resource Center | 2122 York Road, Oak Brook, IL 60523 | P: 630-575-6200

September 19, 2023

Dear Members of the Boards and Commissions Review Committee,

My name is [REDACTED] and I have been a Certified and Licensed Athletic Trainer for seven years, working for the largest employer of Athletic Trainers in the country, Athletico Physical Therapy. We currently employ over 350 athletic trainers across the country, with 50 of those teammates residing and practicing in Iowa. We provide service across Iowa from rural communities such as Garner-Hayfield-Ventura and Dike-New Hartford to growing urban areas like Waukee and Grimes. I am writing to express my deep concern and opposition to the recent consideration of eliminating the Iowa Board of Athletic Training.

The Athletic Training profession is comprised of Certified and Licensed Athletic Trainers from professional, collegiate, and high school teams; industries; physician offices; rehabilitation clinics; and every branch of the United States military working together to promote and practice the profession of Athletic Training within the State of Iowa. Athletic Trainers have a history of providing quality health care for athletes and people engaged in regular physical activity. They are highly skilled licensed professionals who specialize in immediate, acute, and emergency care, examination, assessment, injury prevention, risk management, therapeutic intervention and rehabilitation of injury and illness. We are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS) & also carry National Provider Identifier numbers (NPIs). Lastly, the American Medical Association (AMA) also recognizes Athletic Trainers as an allied health care profession.

Currently, there are more than 1129 licensed Athletic Trainers in the State of Iowa. Since 1994, licensure has provided the highest level of patient protection for the public's safety in Iowa, and it is the standard form of regulation for health care professions across the country. It also ensures clients and employers that an Athletic Trainer is properly trained and taking continuing education. The Iowa Board of Athletic Training also provides scope of practice guidance and protects the public from untrained persons improperly providing athletic training services. There is no expense associated with this Board. The fees that Athletic Trainers pay to renew their license cover all costs.

By eliminating the Iowa Board of Athletic Training and subsequent licensing for Athletic Trainers, we risk losing a dedicated group of professionals who are uniquely qualified to address the specialized needs of athletes and active individuals. Their knowledge in injury prevention, emergency response, and rehabilitation techniques is invaluable in safeguarding the health of those who rely on their expertise.

I urge this committee to reconsider this proposal and recognize the indispensable contributions that Athletic Trainers make to the communities of Iowa. Their skills and training are essential components of a comprehensive healthcare system that prioritizes the physical well-being of its citizens.

In conclusion, I stand firmly against the elimination of the Iowa Board of Athletic Training and implore the Board to continue supporting this critical profession. Let us work together to ensure that athletes and active individuals throughout the state continue to receive the highest standard of care.

[REDACTED]



Comments, BCRC <bcrccomments@iowa.gov>

Boards and Commissions Review - Boiler & Pressure Vessel Board - Section 89.14

1 message

Wed, Sep 20, 2023 at 12:52 AM

To: "BCRCcomments@iowa.gov" <BCRCcomments@iowa.gov>

Hello to the Review Committee,

I am reaching out regarding the recommendation to eliminate the Boiler and Pressure Vessel Board under code Section 89.14. I strongly encourage the Review Committee to reconsider this recommendation and either continue or at the very least consolidate the Boiler and Pressure Vessel Board. This board serves a very important purpose to ensure safety within 1,000's of facilities within our state while also promoting the free market of ASME (American Society of Mechanical Engineers) code adherent boilers and pressure vessels.

The primary concern is that in an effort to streamline government operations and reduce cost, the elimination of this board will achieve exactly the opposite result. This board is made up of unpaid volunteer members of the HVAC industry and its operation comes at negligible cost. It meets on a quarterly basis or when specific needs, such as variance requests, arise. From my experience these variance requests are on the rise as a result of a narrow interpretation of the boiler code by the chief inspector which does not accept ASME code cases not specifically written into the Iowa code. Chapter 91 General Requirements for All Objects from the Labor Services Division of the Iowa Administrative Code adopts the ASME Boiler and Pressure Vessel Code in its opening line 91.1(1). This code inherently accepts all ASME code cases but the second line of our code 91.1(2) only lists four code cases for compliance. Right now, any boiler manufacturer's data report that does not list one of these code cases is rejected and those boilers are not allowed to operate without a written variance. Simple examples of ASME code cases which are currently causing boilers to be rejected include air pressure versus water pressure testing or how relief valves are installed. These code cases do not pose an operational risk and are routinely granted variance by the Boiler and Pressure Vessel Board. Based on 875-91.1(1) it can be interpreted that all ASME code cases should be accepted and no variance should be needed. Without the Boiler and Pressure Vessel Board there is great concern that many if not most new boiler installations, regardless of manufacturer, will be rejected and waivers will not be granted based on this narrow interpretation. If that is the result of the elimination of the Boiler and Pressure Vessel Board it could cause great financial hardship to building owners, contractors, manufactures and their representatives, as well as the state of Iowa which has many of these boilers installed.

Please reconsider the recommendation to eliminate the Boiler and Pressure Vessel Board.

Thank you,





Comments, BCRC <bcrccomments@iowa.gov>

Changes to the Board

1 message

Wed, Sep 20, 2023 at 10:19 AM

To: bcrccomments@iowa.gov

Dear Committee Members,

As a member of the APTA Iowa and a licensed physical therapist in Iowa, I am opposed to the proposed combining of chiropractors, massage therapists, physical therapists, and occupational therapists into the same licensure board. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

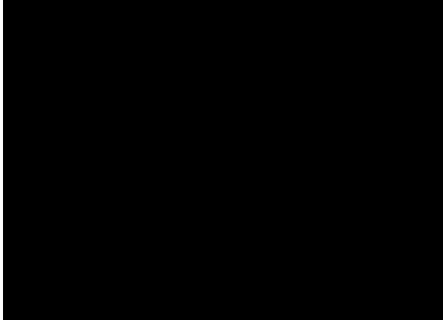
Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,





Comments, BCRC <bcrccomments@iowa.gov>

Issues with combining boards

1 message

Wed, Sep 20, 2023 at 12:52 PM

[REDACTED]
To: bcrccomments@iowa.gov

Dear Committee Members,

As a member of the APTA Iowa and a licensed physical therapist in Iowa, I am opposed to the proposed combining of chiropractors, massage therapists, physical therapists, and occupational therapists into the same licensure board. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.

Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

We appreciate your consideration.

Respectfully,

[REDACTED]



Comments, BCRC <bcrccomments@iowa.gov>

Iowa Board of Athletic Training Comments

1 message

Wed, Sep 20, 2023 at 9:02 PM

To: "bcrccomments@iowa.gov" <bcrccomments@iowa.gov>

Dear Members of the Boards and Commissions Review Committee,

My name is [REDACTED] I have been a Certified and Licensed Athletic Trainer for 19 years, working for the largest employer of Athletic Trainers in the country, Athletico Physical Therapy. We currently employ over 350 athletic trainers across the country, with 50 of those teammates residing and practicing in Iowa. We provide service across Iowa from rural communities such as Garner-Hayfield-Ventura and Dike-New Hartford to growing urban areas like Waukee and Grimes. I am writing to express my deep concern and opposition to the recent consideration of eliminating the Iowa Board of Athletic Training.

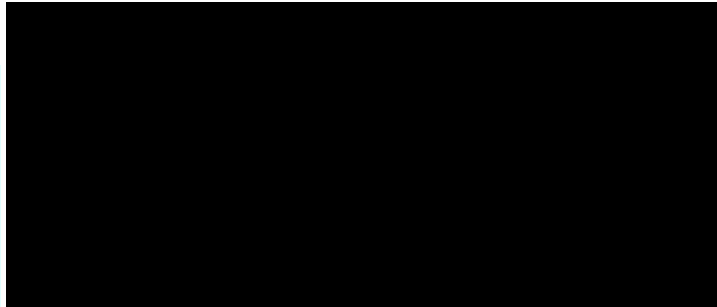
The Athletic Training profession is comprised of Certified and Licensed Athletic Trainers from professional, collegiate, and high school teams; industries; physician offices; rehabilitation clinics; and every branch of the United State military working together to promote and practice the profession of Athletic Training within the State of Iowa. Athletic Trainers have a history of providing quality health care for athletes and people engaged in regular physical activity. They are highly skilled licensed professionals who specialize in immediate, acute, and emergency care, examination, assessment, injury prevention, risk management, therapeutic intervention and rehabilitation of injury and illness. We are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS) & also carry National Provider Identifier numbers (NPIs). Lastly, the American Medical Association (AMA) also recognizes Athletic Trainers as an allied health care profession.

Currently, there are more than 1129 licensed Athletic Trainers in the State of Iowa. Since 1994, licensure has provided the highest level of patient protection for the public's safety in Iowa, and it is the standard form of regulation for health care professions across the country. It also ensures clients and employers that an Athletic Trainer is properly trained and taking continuing education. The Iowa Board of Athletic Training also provides scope of practice guidance and protects the public from untrained persons improperly providing athletic training services. There is no expense associated with this Board. The fees that Athletic Trainers pay to renew their license cover all costs.

By eliminating the Iowa Board of Athletic Training and subsequent licensing for Athletic Trainers, we risk losing a dedicated group of professionals who are uniquely qualified to address the specialized needs of athletes and active individuals. Their knowledge in injury prevention, emergency response, and rehabilitation techniques is invaluable in safeguarding the health of those who rely on their expertise.

I urge this committee to reconsider this proposal and recognize the indispensable contributions that Athletic Trainers make to the communities of Iowa. Their skills and training are essential components of a comprehensive healthcare system that prioritizes the physical well-being of its citizens.

In conclusion, I stand firmly against the elimination of the Iowa Board of Athletic Training and implore the Board to continue supporting this critical profession. Let us work together to ensure that athletes and active individuals throughout the state continue to receive the highest standard of care.



This message may contain information that is confidential, privileged, or otherwise protected from disclosure. If this message contains Protected Health Information, its acquisition, transmission, storage and use is protected by HIPAA. If you are not the intended recipient, any review, disclosure, copying, or distribution, of this material is strictly prohibited. If you receive this message in error or are not the named recipient(s), please contact the sender immediately and delete this message. Thank you for your cooperation.



Comments, BCRC <bcrccomments@iowa.gov>

APTA Iowa Concerns

1 message

Thu, Sep 21, 2023 at 3:32 PM

To: "bcrccomments@iowa.gov" <bcrccomments@iowa.gov>

Date: September 21st, 2023

Dear Legislative Committee,

As a member of the American Physical Therapy Association Iowa Chapter (APTA Iowa), I send this letter as someone who resides in your district to inform you that APTA Iowa has concerns with the combination of several licensure boards recommended by the Committee. The combination of chiropractors, physical therapists, occupational therapists, and massage therapists into one board could result in significant issues.

The primary concern with the proposed combination of boards revolves around practice issues and the potential to create professional conflicts. The board, as described, will not have sufficient members of any given profession to adequately determine if a licensee is practicing properly. The consolidation of the state board of physical therapy with numerous other professions could lead to decreased oversight and peer review, and ultimately could cause harm to the public.


Additionally, the membership as proposed may act as a deterrent to the development of each profession's scope of practice since there are inherent conflicts between professions. "Turf battles" over health care professions' scopes of practice, which occur frequently in the legislature, might extend into the regulatory process in a multi-disciplinary approach to regulation.

Physical therapists possess a high degree of education and clinical expertise and therefore are the most qualified to regulate the practice of physical therapy. Independent boards of physical therapy provide oversight by maintaining peer and public members on the board. By allowing physical therapists to oversee the regulation of physical therapy, protection of the public can be maintained. Other health care providers are not qualified to regulate physical therapy and could have interests that conflict with or limit the practice of physical therapy.

While becoming an independent board is unlikely, we request your consideration of combining with similar health care providers to include continuation with occupational therapists and adding speech pathology and audiology, removing chiropractors and massage therapists. A combined board of therapy providers will allow for less conflicts of interest and more collaboration on regulating and advancing rehabilitative and habilitative therapy for consumers.

Your consideration is appreciated.

Respectfully,





Comments, BCRC <bcrccomments@iowa.gov>

proposed elimination of professional Boards

1 message

[REDACTED]
To: BCRCComments@iowa.gov

Thu, Sep 21, 2023 at 5:35 PM

I am a 55+ member of the Academy of Nutrition and Dietetics (AND) and hold a current license to practice dietetics in Iowa . Although I am retired, not working and probably will not renew my license; but I wish to strongly submit my protest to ANY attempt to eliminate the Board that regulates Dietetics.

It was a hard fought effort to establish professional regulation as it is necessary for almost all health related professional occupations. The Board oversees the qualifications of persons seeking a license to practise in this field and is simply and plainly FOR THE PROTECTION OF THE PUBLIC. Should qualifications lack or practice be substandard , the board provides the public with a place to investigate fraudulent practice and can deny license to persons not qualified.

This is an ill thought out change in government and should NOT be implemented.

[REDACTED]