3 November 2020

Dear COMS,

In consideration of O&M students completing university internship requirements, the ACVREP COMS Subject Matter Expert Committee (SME) reviewed direct instruction hour requirements due to the impact of the pandemic.

We recognize that new ways of teaching are emerging and that telepractice will continue. We are aware of constraints and limitations on face to face instruction and recognize the hardship this causes to O&M interns in completing requirements for graduation and/or COMS certification. The COMS SME feels strongly about the following principles:

- 200 hours is a minimum for direct client instruction;
- preference is for face-to-face contact rather than telepractice wherever possible;
- the safety and effectiveness of service delivery via telepractice depends on the availability of assistance at the student’s/client's end;
- the university program internship supervisor along with the COMS supervisor are in the best position to evaluate the student's/client's learning needs and make decisions about service delivery methods that will build competency in the COMS intern.

With these principles in mind, the COMS SME defers to the AER Higher Education Accreditation Council to make recommendations about the maximum number of telepractice hours allowed as direct instruction for O&M interns who are completing university programs.

Sincerely,

ACVREP COMS Subject Matter Expert Committee

Dr. Laura Bozeman. Co-Chair
Erica Ihrke, Co-Chair
Brenda Naimy
Dr. Molly Pasley
Jennifer Urosevic
Lauralyn Randles
Dr. Nancy Higgins
Mathew Hogel
Chris Tabb
Dr. Kim Zebehazy
Dr. Elizabeth (Lil) Deverell
Dr. Rob Wall Emerson
Loralyn Randles

Nolan Markle