

Idaho Board of Massage Therapy

Board/Commission Members:

- Linda A. Chatburn, Boise – Chair
- Carla A. Steen, Idaho Falls
- Gail L. King, Blackfoot
- Marcia C. Garey, Boise
- Dr. Mary Jo White, D.C., Post Falls – Public Member

Board/Commission Composition: The Board consists of five (5) members: four (4) licensed under this board, and one (1) public member. Board members serve a term of three (3) years. [Idaho Code § 54-4006](#).

Operational costs per licensee: \$52.09. This number represents the dollar amount required annually to serve each applicant or licensee based on the average number of licensees and the average expenditures since Fiscal Year 2014. This includes all administrative, fiscal, legal and investigative services.

Total number of licensees in Idaho on May 19, 2018: **2,311**.

For the Idaho Board of Massage Therapy, the **shortest time** from complete application to issuing a license was the **same day**. The **longest time** from complete application to issuing a license was **70 days**. For all licenses issued, **44 percent** were issued the **same day**. The **average time** from complete application to issuing a license was **7 days**. The Board issued **316 licenses** between May 19, 2017 and May 19, 2018.

Note: All Board meetings are subject to Idaho's Open Meeting Law. The law requires a minimum of five (5) calendar days' notice for regular meetings, and a forty-eight (48) hour notice for the agenda. Special meetings require twenty-four (24) hour meeting and agenda notice. Idaho Code [§ 74-204](#).

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A. Index of Statute, Rule, and Policy Requirements for Licensure and Renewal

| | | Statute Title 54, Chapter 40 | Rule IDAPA 24.27.01 | <i>*Policy</i> | Application | Basis to Deny Issuance or Renewal | Fees |
|---------------------|------------------------------|---------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------|----------------|----------------------------------------------------------------------------|------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------|
| Massage Therapist | Issuance for Initial License | I.C. § 54-4009 I.C. § 54-4010 | IDAPA 24.27.01.300 IDAPA 24.27.01.301 | * | Application Endorsement Application | I.C. § 54-4009 I.C. § 53-4013 | \$50 Application Fee \$65 License Fee \$75 Endorsement License Fee |
| | Renewal Requirements | I.C. § 54-4011 | IDAPA 24.27.01.400 | * | | I.C. § 53-4013 I.C. § 67-2614 | \$65 Renewal Fee |
| Temporary License | Issuance for Initial License | I.C. § 54-4007 | IDAPA 24.27.01.320 | * | Application | IDAPA 24.27.01.320 | \$25 License Fee |
| | Renewal Requirements | N/A | N/A | * | | N/A | N/A |
| Provisional License | Issuance for Initial License | I.C. § 54-4007 | IDAPA 24.27.01.330 | * | Application | IDAPA 24.27.01.330 | \$25 License Fee |
| | Renewal Requirements | I.C. § 54-4007 | IDAPA 24.27.01.330 | * | | IDAPA 24.27.01.330.02 | \$25 License Fee |

**All of the Board's requirements for licensure and renewal are in statute or rule. The Board does not have any requirement policy.*

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B. Applications and Renewals Denied, May 19, 2017-May 19, 2018

Refusal to Issue Initial License [Total Number: 1]

| | Basis in Statute and/or Rule | Factual Summary |
|---|-----------------------------------------------------------------------|----------------------------------------------------|
| 1 | I.C. § 54-4003 and IDAPA 24.27.01.600 | Applicant must meet educational program standards. |

Refusal to Renew License [Total Number: 0]

| | Basis in Statute and/or Rule | Factual Summary |
|--|-------------------------------------|------------------------|
| | None | |

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C. Disciplinary Actions for the Last Five (5) Years**

The Idaho Board of Massage Therapy received **113 complaints** from Fiscal Year 2013 through May 19, 2018. During this time frame, **58 complaints were closed** by the Board with no disciplinary action; **48 resulted in disciplinary action**; **3 were pending legal review**; and **4 remained under investigation**.

***The detail provided below is only for disciplinary action closed between May 19, 2017 and May 19, 2018. Cases are not always closed within the same fiscal year they are opened, and sometimes multiple complaints are included in one disciplinary action. The Board's full [disciplinary action information](#) is available online.*

| Case No. | Date of Final Action | Action Taken | Statutory Basis | Summary of Factual Basis |
|-------------|----------------------|-------------------|-----------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| MAS-2018-21 | 5/14/2018 | Settlement Order | I.C. § 54-4007(8) ; IDAPA 24.27.01.500 | Continuing education (CE) non-compliance. |
| MAS-2018-20 | 5/14/2018 | Settlement Order | I.C. § 54-4007(8) ; IDAPA 24.27.01.500 | CE non-compliance. |
| MAS-2018-18 | 5/14/2018 | Consent Order | I.C. § 54-4013(3) | Respondent was convicted of two counts of Felony Injury to a Child. |
| MAS-2018-17 | 5/14/2018 | Final Board Order | I.C. §§ 54-4013(1), (2), (3), (5) and (11) ; IDAPA 24.27.01.800 and Appendix B, Standards I.9 and II.2. | Respondent was convicted of Felony Possession of a Controlled Substance with Intent to Deliver, failed to report the felony conviction on her renewal application, and falsely answered "No" to the question whether she had received a felony conviction since her last renewal. In addition, Respondent fell asleep or passed out several times on a client during a massage. |
| MAS-2018-15 | 3/5/2018 | Consent Order | I.C. § 54-4007(8) ; IDAPA 24.27.01.500 | CE non-compliance. |
| MAS-2018-12 | 1/8/2018 | Final Board Order | I.C. § 54-4007(8) ; IDAPA 24.27.01.500 | CE non-compliance. |

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| Case No. | Date of Final Action | Action Taken | Statutory Basis | Summary of Factual Basis |
|-------------|----------------------|------------------|-------------------------------------------------------------------------------------------|-----------------------------------------------|
| MAS-2018-16 | 11/27/2017 | Settlement Order | I.C. § 54-4007(8) ; IDAPA 24.27.01.500 | CE non-compliance. |
| MAS-2018-14 | 11/27/2017 | Settlement Order | I.C. § 54-4007(8) ; IDAPA 24.27.01.500 | CE non-compliance. |
| MAS-2018-11 | 11/27/2017 | Settlement Order | I.C. § 54-4007(8) ; IDAPA 24.27.01.500 | CE non-compliance. |
| MAS-2018-9 | 9/18/2017 | Settlement Order | I.C. § 54-4007(8) ; IDAPA 24.27.01.500 | CE non-compliance. |
| MAS-2018-8 | 9/18/2017 | Settlement Order | I.C. § 54-4007(8) ; IDAPA 24.27.01.500 | CE non-compliance. |
| MAS-2018-5 | 9/18/2017 | Settlement Order | I.C. § 54-4007(8) ; IDAPA 24.27.01.500 | CE non-compliance. |
| MAS-2018-4 | 9/18/2017 | Settlement Order | I.C. § 54-4007(8) ; IDAPA 24.27.01.500 | CE non-compliance. |
| MAS-2018-3 | 9/18/2017 | Settlement Order | I.C. § 54-4007(8) ; IDAPA 24.27.01.500 | CE non-compliance. |
| MAS-2018-2 | 9/18/2017 | Settlement Order | I.C. § 54-4007(8) ; IDAPA 24.27.01.500 | CE non-compliance. |
| MAS-2018-1 | 7/31/2017 | Settlement Order | I.C. § 54-4007(8) ; IDAPA 24.27.01.500 | CE non-compliance. |
| MAS-2017-21 | 7/31/2017 | Consent Order | I.C. §§ 54-4005(1) and 54-4013(5) and (7) | Respondent practiced with an expired license. |

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| Case No. | Date of Final Action | Action Taken | Statutory Basis | Summary of Factual Basis |
|-------------|----------------------|-------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| MAS-2017-9 | 5/22/2017 | Final Board Order | I.C. §§ 54-4013(2), (5) and (11); IDAPA 24.27.01.750 and IDAPA 24.27.01.800 , Appendix A, Paragraph 13, and Appendix B, Standard I, Paragraph 9 and Standard V, Paragraph 1 | Respondent requested, received and took controlled substances which had been prescribed to Client #1; left Client #2 in the middle of a massage and appeared under the influence of drugs or alcohol when returning 30 minutes later and then fell on the client's back and laid there for a period of time; abruptly stopped a massage for Client #3, leaving the client alone and telling the client to close the door when the client left; and left Client #4 in the middle of a massage so Respondent could go home and smoke marijuana. |
| MAS-2017-6 | 5/22/2017 | Consent Order | I.C. § 54-4007(8); IDAPA 24.27.01.500 | CE non-compliance |
| MAS-2017-4 | 5/22/2017 | Final Board Order | I.C. § 54-4007(8); IDAPA 24.27.01.500 | CE non-compliance |
| MAS-2017-25 | 5/22/2017 | Settlement Order | I.C. § 54-4007(8); IDAPA 24.27.01.500 | CE non-compliance. |
| MAS-2017-24 | 5/22/2017 | Settlement Order | I.C. § 54-4007(8); IDAPA 24.27.01.500 | CE non-compliance. |
| MAS-2017-22 | 5/22/2017 | Settlement Order | I.C. § 54-4007(8); IDAPA 24.27.01.500 | CE non-compliance. |
| MAS-2017-2 | 5/22/2017 | Final Board Order | I.C. §§ 54-4013(5), (8) and (11); IDAPA 24.27.01.750 and IDAPA 24.27.01.800 , Appendix A, Paragraphs 4 and 9, and Appendix B, Standards 1.2, 1.8 and VI | Respondent made inappropriate comments to clients during massages and asked a client to pull down a draping sheet so he could work on an area, causing the client to feel exposed. |

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| Case No. | Date of Final Action | Action Taken | Statutory Basis | Summary of Factual Basis |
|-----------------|-----------------------------|---------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| MAS-2017-19 | 5/22/2017 | Settlement Order | I.C. § 54-4007(8) ; IDAPA 24.27.01.500 | CE non-compliance. |
| MAS-2017-14 | 5/22/2017 | Consent Order | I.C. §§ 54-4005(1) and 54-4013(5) and (7) | Respondent practiced with an expired license. |
| MAS-2017-13 | 5/22/2017 | Consent Order | I.C. §§54-4013(5) and (8) ; IDAPA 24.27.01.750 , Appendix B, Standard VI.1 and IDAPA 24.27.01.800 , Appendix A, Paragraphs 4 and 9 | Respondent engaged in improper touching and improper draping during a massage, and initiated a personal relationship with the client by putting his telephone number into the client's cell phone and offering to perform a "Latin" massage at another location. |

Idaho Board of Massage Therapy

D. Changes or Attempted Changes in Last 5 Years to Eliminate Barriers to Entry

Law and Rule

| Session | Legislation or Rule | Summary |
|---------|-----------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2012 | Senate Bill 1295 | In 2012, the Massage Therapy Association proposed and the Legislature approved Senate Bill 1295. The purpose of this legislation is to add Chapter 40 to Idaho Code Title 54 to provide a process for licensing massage therapists. Massage therapy has become an accepted part of conventional medicine to assist patients working to improve their health or recovering from an injury or medical procedure. Currently, anyone may advertise themselves as a massage therapist regardless of their level of training or lack thereof. Requiring a license of professional and trained massage therapists will ensure that citizens seeking this form of therapy will receive appropriate care. |
| 2013 | Docket No. 24-2701-1201 | The 2012 Legislature passed Senate Bill 1295 which created the State Board of Massage Therapy. These proposed rules implemented the provisions of Title 54, Chapter 40, Idaho Code. The Board met eight (8) times in 2012 to draft rules. The Board's work in adopting the first set of rules was transparent and inclusive of state and national associations, groups and interested parties. |

Law and Rule (continued)

| Session | Legislation or Rule | Summary |
|---------|-----------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2015 | Docket No. 24-2701-1401 | <p>This rule provides clarification on continuing education hours and supervision. It deletes approved courses on light therapies. Light therapies are not within the scope of massage therapy, Idaho Code Title 54, Chapter 40. This rule creates a distinction between supervision of clinical work in an educational setting and supervision of field work.</p> <p>Impact: Clinical work by a student is with direct on-site supervision. Field work requires the supervisor be available, but not on site. This allowed students to work outside of the classroom to gain expertise in the field. It clarified the supervising massage therapist must be available to render direction either in person or by means of telecommunication, but is not required to be physically present on the premises where massage therapy is being provided.</p> |
| 2015 | House Bill 23 | <p>The Board proposed and the Legislature passed House Bill 23, which adds an exemption to the Act. This exemption allows individuals licensed in another state, territory, or country to provide massage therapy to patients/clients temporarily in Idaho participating in an organized athletic event or affiliated with established athletic teams or organizations or performing arts companies.</p> <p>Impact: This allows those licensed in another jurisdiction to travel to Idaho and provide massage therapy for performing arts companies and for athletic events in Idaho.</p> |
| 2016 | House Bill 519 | <p>In 2016 a legislator introduced House Bill 433, which would allow for a tuition work-off program. The Board requested that a temporary license and provisional permit be added to the bill. House Bill 519, which included these provisions, replaced House Bill 433.</p> |

Law and Rule (continued)

| Session | Legislation or Rule | Summary |
|---------|-----------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2017 | Docket No. 24-2701-1601 | <p>These rules are in response to House Bill 519, which passed during the 2016 Legislature. These rules accomplish the following:</p> <ul style="list-style-type: none"> • The temporary license provision allows applicants to get to work sooner. Under this provision, any person who has submitted to the Board a complete application for licensure by examination or by endorsement may apply for a temporary license to practice massage therapy while their application is being processed. • The provisional permit allows an applicant to practice massage therapy under supervision if the applicant meets all the requirements for licensure except for having successfully passed a nationally recognized competency examination. This allows an individual to go to work until they can take the next available exam. A provisional permit may be renewed once upon a showing of good cause. • Lowered the original license fee from \$75 to \$65, and lowered the annual renewal fee from \$75 to \$65. |
| 2017 | House Bill 7 | <p>The Idaho State Board of Education requested that the Board of Massage Therapy be able to review and approve the curriculum of massage therapy educational programs that seek registration by the State Board.</p> <p>This legislation did not pass.</p> |
| 2017 | House Bill 8 | <p>Based on concerns from the public, this bill amends the massage therapists chapter of the Idaho Code to require applicants and currently licensed massage therapists to obtain and submit a satisfactory fingerprint-based criminal history check to the Idaho Board of Massage Therapy for the public's protection.</p> <p>Background checks would align Idaho with surrounding states that already have this layer of public protection in place, and with other types of health care professionals who are required to have background checks.</p> <p>This legislation did not pass.</p> |

Law and Rule (continued)

| Session | Legislation or Rule | Summary |
|---------|------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2017 | House Bill 9 | <p>The Board proposed and the Legislature approved a bill to increase the honorarium paid to the members of the Board of Massage Therapy for each day spent in the actual performance of their duties from \$50 to \$100.</p> <p>Impact: While recognizing the honorarium does not cover the cost to a volunteer Board member for their time serving on the Board, increasing the amount may help attract Board members. This is also consistent with the increases to the honorariums for other Boards.</p> |

Additional Barriers Eliminated/Opportunities Provided

| Date | Barriers/ Opportunities | Summary |
|------|---------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2017 | Implemented Idaho Code for military service and added it to the Board's website | <p>I.C. § 67-2620 For military service members and veterans, the Board added to its website a link to a law that says the Board may accept military training and experience toward qualification for licensure. The law states that professional and occupational licensing boards may accept military education, training, and experience toward meeting the qualifications for a license, certification or registration. Boards may also expedite applications, including military spouse applications.</p> <p>I.C. § 67-2602A Additionally, if a licensee already holds an active Idaho license and is on active duty in the United States Armed Forces, that license will remain active without renewing it for six (6) months following discharge from active duty. The license shall remain in good standing without the necessity of renewal and during said period the same shall not be cancelled, suspended or revoked.</p> |

Additional Barriers Eliminated/Opportunities Provided (continued)

| Date | Barriers/ Opportunities | Summary |
|------|---------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2015 | I.C. § 67-2614 | <p>Set the reinstatement fee to \$35 and eliminated the requirement that, in addition to the reinstatement fee, the licensee had to include payment of the license fees for all of the years the license had been expired. It also clarified the continuing education required to reinstate.</p> <p>Reasons/impact of law change: Those whose licenses expired within the last five (5) years had to pay licensure fees for each year they were expired. Anyone whose license had been expired for more than five (5) years would have to apply as a new applicant. This law change reduced barriers to reentry in two ways. For those whose licenses have been expired for less than five (5) years, it eliminated the requirement to pay licensure fees for each year the license was expired. For those whose licenses have been expired for more than five (5) years, it allows the Board to consider education, supervised practice, examination or practice in another jurisdiction in determining the person’s competency when reviewing applications.</p> |
| 2015 | Telehealth Access Act | Allows practitioners to offer telehealth services. (Title 54, Chapter 57) |
| 2013 | Conference calls | The Board holds conference calls when needed between face-to-face meetings in order to expedite applications. |
| 2012 | Senate Bill 1295 | This bill will remove members of the Idaho Board of Massage Therapy from the Public Employee Retirement System of Idaho (PERSI) by changing the payment they receive from compensation to an honorarium under I. C. § 59-509(n) . |

Idaho Board of Massage Therapy

E. Assessment of Public Interest

Licensure in Idaho is designed to protect the health, safety, and welfare of the public by ensuring that massage therapy services are provided by people who the Board has affirmed meet minimum qualifications to perform massage therapy.

Massage Therapy is the application of a system of structured touch, pressure, movement and holding of the soft tissues of the human body. Therapies within the scope of massage therapy practice include assessment of medical history, symptoms, skin and soft tissue and joints of the body and the treatment and prevention of physical dysfunction and pain of the soft tissue and joints by manipulation to develop, maintain, rehabilitate or augment physical function, or relieve pain.

When administered correctly, physical function can be developed, maintained and improved; and physical dysfunction and pain and the effects of stress can be relieved or prevented through the use of massage therapy. When administered incorrectly, massage therapy could potentially result in cardiac events, pulmonary overload, blood clots, nerve damage, infectious skin conditions, fractures, inadvertent induction of labor, bruising, swelling, allergies to lubricant or topical preparations and temporary or permanent pain and discomfort. These risks are minimized when the person performing the therapy is adequately trained and follows proper infection control procedures and patient/client assessment.

The public expects their practitioner to be competent in performing these treatments and therapies, such that they can be reasonably certain that the services they receive will not harm them or put them at further risk for injury and disease.

F. Recommendations for Improvement, Modification, or Elimination of Requirements

1. The Board received many comments from the public on background checks. More than thirty (30) states have a background or fingerprint requirement which may reduce human trafficking and address other issues regarding public safety. The Board recommends continued participation at the national level with the Federation of State Massage Therapy Boards (FSMTB) regarding state-to-state alignment, education, fraudulent documents (such as transcript mills), and human trafficking. The Board will continue to work with policymakers on these issues.
2. As part of the Board's review of portability, it recognizes that because Idaho requires 500 hours of education, which is below the national average of 670 hours, it does not align with other states. While this may make it easy for licensees who wish to come to Idaho, this may affect Idaho licensees who wish to become licensed in other states.
3. Review continuing education (CE):
 - a. Possibly change requirements to every two years and educate licensees about the use of carryover of CE credit.
 - b. Clarify what is germane to massage therapy; for example, whether further clarification is needed on exempted modalities.

Idaho Board of Massage Therapy

Summary of Objectives

The Licensing Freedom Act asked that all of Idaho's professional licensing entities critically look at their processes, laws and rules. The goal is to document the elimination of barriers and make recommendations for future changes that improve, modify or eliminate laws and rules governing professional licensure. In response, the Idaho Board of Massage Therapy respectfully submits the above report and summarizes with a checklist to ensure all of the objectives were met:

- ✓ Objectives of Executive Order
 - ✓ Protect the public. (*I.C. [§ 54-4001](#)*)
 - ✓ Portability of licensure. (*[IDAPA 24.27.01.310](#) and *I.C. [§ 54-4010](#)*; also see *Section F*)*
 - ✓ Eliminate barriers to entry to work. (*I.C. [§ 54-4007\(11\)](#), [IDAPA 24.27.01.320](#) and [IDAPA 24.27.01.330](#), *temporary license and provisional permit*)*
 - ✓ Do away with unnecessary regulation. (*I.C. [§ 54-4003\(2\)\(c\)](#), *exemption for out-of-state licensees*)*
 - ✓ Modernize licensure and regulatory requirements. (*This Act is fairly recent; it was drafted by the Massage Therapy Association and approved by the Legislature in 2012*)
- ✓ Comprehensive Review - consider some of the issues raised in the background material, such as,
 - ✓ Telework – Idaho has recently passed laws related to telehealth but other occupations may be facing similar issues regarding telework. (*[Title 54, Chapter 57](#)*)
 - ✓ Distance/Online Learning/Testing – Distance/online education and testing are increasingly available and may influence the resources that applicants or licensees can access to obtain education, continuing education or to test. (*[IDAPA 24.27.01.502.3](#), *online continuing education opportunities; the national exam is available online and may be scheduled through testing centers**)
 - ✓ Criminal History – What barriers or additional obstacles do applicants/licensees face who have a criminal conviction? Do our laws consider the relevance or proximity in time of a conviction to the individuals applying for licensure or for those currently in practice? (*[IDAPA 24.27.01.306](#), *allows for consideration**)
 - ✓ Early Examination – What can be addressed in the timing of processes to eliminate unnecessary delays? (*[IDAPA 24.27.01.330](#) *allows an individual to go to work until they can take the next scheduled exam**)
 - ✓ CE Hardship – Is there an allowance for extenuating circumstances? (*[IDAPA 24.27.01.500.03](#), *CE waiver*; [IDAPA 24.27.01.500.04](#), *CE carryover**)
 - ✓ Temporary Permits – Are there opportunities to work while minimum requirements are being met? (*[IDAPA 24.27.01.320](#), *temporary license*; [IDAPA 24.27.01.330](#), *provisional permit**)