

Snell, Toby (PLA)

From: CB [REDACTED]
Sent: Wednesday, August 6, 2025 6:32 AM
To: Snell, Toby (PLA)
Subject: LSA Document #25-329 Occupational Therapy Profession Updates

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Dear legislator,

I am submitting comments regarding the proposed rule changes in LSA Document #25-329, which I believe could negatively impact occupational therapy practice in Indiana.

First, I do not understand the rationale for the revision to Section 844 IAC 10-5-6(a) to reduce the timeframe for countersigning, what value does it lend? People may be on vacation and to create undue pressure for a process that happens anyway does not seem well thought out. Please keep the (7) calendar day timeframe intact as it is already more stringent than our neighboring states.

Second, regarding the language in Section 844 IAC 10-5-5 that could imply an OTA may "complete" evaluations independently. A counterpart who requires a cosign as outlined above does not have the education or experience to complete evaluations; they are valuable support staff. National guidance is clear that OTAs may contribute to evaluations under supervision but are not licensed to complete one-hence the need for supervision from an OT.

Third, please reconsider the proposed \$100 state fee for compact privilege (in addition to national fees); a lower fee encourages professional engagement across states and could bring revenues to our state from people working here based on an affordable and reasonable compact privilege.

Thank you for considering these concerns, listening to our reasoning, and promoting rules that support the enhancement of OT practice.

Best regards,

Carol Barnes, MS OTR, MBA

Indianapolis, Indiana