

Snell, Toby (PLA)

From: Brenda Howard [REDACTED]
Sent: Wednesday, August 6, 2025 12:03 PM
To: Snell, Toby (PLA)
Subject: LSA Document #25-329 Occupational Therapy Profession Updates

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Dear PLA:

I am submitting comments regarding the proposed rule changes in LSA Document #25-329.

Section 844 IAC 10-5-6(a): 5 days may not be enough time in some settings for countersigning notes. I recommend keeping the time period at 7 days.

Section 844 IAC 10-5-5: Per guidance from the American Occupational Therapy Association, accrediting body, and National Board for Certification in Occupational Therapy, OTA practitioners should NOT be completing full evaluations. I recommend changing the language to "complete screenings and contribute to evaluations under the supervision of a licensed occupational therapist."

State fee for compact privilege: \$100 is a burdensome amount to add to licensure fees. High costs of licensure are contributing to OT practitioners avoiding membership fees in state and national associations, which limits advocacy for the profession and the clients we serve. I do hope there is a way to keep the fee at a more reasonable rate.

I thank you for your time.

Sincerely,

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