

Snell, Toby (PLA)

From: Kelly Packwood [REDACTED]
Sent: Wednesday, August 6, 2025 8:44 AM
To: Snell, Toby (PLA)
Subject: : LSA Document #25-329 Occupational Therapy Profession Updates

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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 strongly oppose the revision to Section [844 IAC 10-5-6\(a\)](#), reducing the timeframe for countersigning OTA documentation from seven (7) to five (5) calendar days. This would place undue pressure on occupational therapy practitioners without improving patient care outcomes. Indiana's countersignature requirements are already more stringent than neighboring states.

Second, I have concerns about the language in Section [844 IAC 10-5-5](#) that could imply an OTA may "complete" evaluations independently. This contradicts national guidance and should be clarified to indicate that OTAs contribute to evaluations under the supervision of an occupational therapist.

Third, I believe the proposed \$100 state fee for compact privilege (in addition to national fees) is excessive and could deter participation. A lower fee would better support access, mobility, and professional engagement across states.

Thank you for considering these concerns and for promoting rules that reflect modern, collaborative, and effective OT practice.

Sincerely,

Kelly Packwood COTA, CKTP, CEAS

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