

S2623- PRO

March 25, 2024

Dear Members of the House Corporations Committee,

Thank you for your service. My name is Elizabeth Clegg, I am the Rhode Island State Ambassador for the National Board for Certification in Occupational Therapy (NBCOT) which is a national not-for-profit organization that provides certification for occupational therapy practitioners. NBCOT's mission is to serve the public interest. I am also an Occupational Therapist working in acute care in Rhode Island. I have been an Occupational Therapist for 22 years.

I am writing in support of H7945 The Occupational Therapy Licensure Compact.

Much like the existing licensure compacts for nurses, physical therapists, physicians, psychologists and EMS personnel, the OT Compact will increase licensure portability while allowing member state regulatory boards to better protect consumers through enhanced sharing of licensure information.

OT compact legislation would be great for Rhode Island. So far 28 States have enacted OT compact legislation. An additional 7 states have introduced legislation and several others are considering or beginning to introduce legislation including our neighbors in the Tri-State area and New England. The states participation and initiating legislation can be seen here: <https://otcompact.org/compact-map/>

The Occupational Therapy Licensure Compact does the following:

- Improves access to Occupational Therapy care and choice of providers
- Improves licensure portability for occupational therapists and occupational therapy assistants through a mutual recognition model of a valid license issued by other member states
- Allows Occupational Therapy practitioners to more easily cross state lines for employment opportunities or to provide services in multi-state locations
- Facilitates services delivered through telehealth
- Supports military members who are relocating or others who change their primary state of residence frequently
- Improves continuity of care for clients relocating, traveling between states, or living in border communities
- Encourages cooperation among member states in regulating Occupational Therapy practice
- Preserves and strengthens state licensure systems through a centralized data base and reporting system for licensing, disciplinary, and investigative information
- Enhances public safety by this system and requirement of criminal background checks
- Requires continuing education for all who practice under the compact
- Streamlines and improves the timeliness of the licensing application experience
- Provides for individual states to charge an appropriate fee for a compact privilege potentially increasing revenue
- Establishes an Interstate Compact Commission to carry out the compact purpose with each member state designating a Compact Commissioner as a representative

The Occupational Therapy Compact does not:

- Change State licensure law, rules and regulations or scope of practice
- Take over state regulatory authority

- Alter the state's authority to protect the public and regulate the OT profession
- Create a financial burden
- Require individual clinicians to participate – seeking compact privileges in other states is entirely voluntary

When I worked in skilled nursing facilities in Southeastern Massachusetts and Rhode Island, it was at times very difficult to provide appropriate staff coverage because not all occupational therapy practitioners were licensed in both states. Staffing decisions were based on licensure, not on who was the most appropriate or consistent personnel to provide services on a given day. Making the process easier would have allowed for more mobility of occupational therapy practitioners, and better delivery of care.

Per the Department of Defense, Military families move every three years on average. The Compact helps military spouses relocate and begin work without delay by reducing the amount of time and effort needed to gain authorization to practice in a new state, even as compared to expedited licensure laws for military spouses. It takes only a few minutes to obtain a compact privilege from the Commission's web site.

When the physicians started the Interstate Medical Licensure Compact (IMLC) they found that mobility of physicians improved for those practicing in states that participate in the IMLC. This improves access to care. The volume of physicians receiving their licenses via the IMLC pathway has grown tremendously since this was initiated. Refer to data for initial licensure for the IMLC here:

https://www.imlcc.org/wp-content/uploads/2023/09/IMLCC_2019-2022NewLicenseVolume_DataStudy-F2.pdf

Please approve S2623.

Thank you for your consideration,

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