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March 26, 2024

The Honorable Joseph J. Solomon, Jr., Chair
House Committee on Corporations
State House
82 Smith St.
Providence, RI 02903

RE: H 7945 – An Act Relating to Businesses and Professions – Occupational Therapy Licensure Compact

Dear Chair Solomon:

Please accept this letter of concern on H 7945, legislation that would create the Occupational Therapy Licensure Compact to allow licensed occupational therapists and occupational therapy assistants to practice in all states that join the compact. This act would also remove the need for practitioners to get an individual license in each state where they want to practice and would take effect upon passage.

The Rhode Island Department of Health (RIDOH) is currently reviewing this compact proposal at the programmatic level and is seeking input from the associated board to carefully analyze the impact that joining this compact would have on the initial licensure and disciplinary processes and current licensure requirements.

RIDOH has long supported licensure compacts as a vehicle to increase the accessibility of healthcare services from a larger and more diverse pool of practitioners and streamline the licensure process for appropriately trained and credentialed professionals. However, RIDOH must fully analyze compact requirements, including licensure requirements, disciplinary complaints, and fiscal impact to implement the compact.

Operationalizing this compact is not without significant costs, as it will require the configuration of data-sharing capability between RIDOH's licensing system (MLO) and the compact. RIDOH's recent implementation of the Nurse Licensing Compact required significant time from RIDOH Information Technology (IT) staff and RIDOH licensing staff, including the need for contracted temporary staff. The cost for contracted services from System Automation, the MLO software vendor, was approximately \$130,000 for the Nursing Compact.

Unlike the Compacts currently under consideration, the Nursing Compact has been operational nationally for several years, and Rhode Island was a Compact member previously. RIDOH staff's familiarity with the software vendor and with the Nursing Compact's conventions decreased implementation time and costs. Additionally, RIDOH offset some of the costs through a \$205,000 grant from the National Council of State Boards of Nursing.

RIDOH does not have information regarding the Occupational Therapy Licensure Compact's ability to support the costs associated with compact implementation. Currently, many of these proposed compacts are utilizing federal and professional grant funding to begin their internal operations. An estimate of the technology cost of this new compact system will be roughly

double the costs incurred for the Nursing Compact, with software contracting expenses of an estimated additional \$300,000 over six months for the new compact system. In addition, the new compact will require additional personnel resources to convert existing licensees to the new system. Based on the additional hiring of temporary employees for the Nursing Compact, RIDOH projects the cost of employing four contractors for six months is between \$50,000 and \$171,627.

RIDOH looks forward to working with the Committee, our Occupational Therapist Board, and the Occupational Therapy Licensure Compact administration to learn more about this compact's requirements and potential benefits to regulated professionals and patients here in Rhode Island.

Thank you for the opportunity to comment on this legislation.

Sincerely,



Utpala Bandy, MD, MPH
Interim Director

CC: The Honorable Members of the House Committee on Corporations
The Honorable Joseph M. McNamara
Nicole McCarty, Chief Legal Counsel to the Speaker
Lynne Urbani, Director of House Policy
