



# PREPROPOSAL STATEMENT OF INQUIRY

**CR-101 (October 2017)  
(Implements RCW 34.05.310)**

Do **NOT** use for expedited rule making

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DATE: December 18, 2023

TIME: 12:50 PM

WSR 24-01-099

**Agency:** Department of Health - Occupational Therapy Practice Board

**Subject of possible rule making:** Streamlining occupational therapy licensure and endorsement. The Occupational Therapy Practice Board (board) is considering updates to reduce barriers to enter and remain in the occupational therapy (OT) workforce, streamline and shorten the credentialing process. The board is also considering amendments to the chapter to address concerns raised by interested parties. The board will consider amending chapter 246-847 WAC, and possibly repealing or creating new sections.

The board is considering rule amendments to implement Second Substitute House Bill (2SHB) 1724 (Chapter 425, Laws of 2023) for the following WAC sections: WAC 246-847-080 Examinations; WAC 246-847-125 Applicants currently licensed in other states or territories; WAC 246-847-051 Military equivalence; WAC 246-847-068 Expired license; and WAC 246-847-070 Inactive credential. To align rules with this legislation, the board will consider: (1) reducing or removing barriers to entering and remaining in the occupational therapy care workforce, (2) measures to streamline and shorten the credentialing process, and (3) other amendments to the chapter as appropriate. Additionally, the board will consider amendments to WAC 246-847-065 (Continuing Education Requirements) to align with the national certifying board and WAC 246-847-170 (Code of Ethics and Standards of Professional Conduct) to ensure care is done ethically and professionally.

**Statutes authorizing the agency to adopt rules on this subject:** RCW 18.59.130, 2SHB 1724 (Chapter 425, Laws of 2023)

**Reasons why rules on this subject may be needed and what they might accomplish:** Section 8 of 2SHB 1724 directs boards and commissions to waive certain requirements to licensure for specific types of applicants. The intent of the bill was to change licensure requirements to remove barriers to entering and remaining in the health care workforce, and to streamline and shorten the credentialing process. Rulemaking may be necessary to amend licensure requirements to align with the new legislation. Additionally, the board consistently receives inquiries on whether an OT can work off the evaluation of another profession such as a physical therapist. The board is considering adding rule language that makes it clear that an OT must complete their own evaluation of the client, and will consider adding language that aligns continued competency rules with the national certifying board.

**Identify other federal and state agencies that regulate this subject and the process coordinating the rule with these agencies:** None

**Process for developing new rule (check all that apply):**

- Negotiated rule making
- Pilot rule making
- Agency study
- Other (describe) Collaborative Rulemaking

**Interested parties can participate in the decision to adopt the new rule and formulation of the proposed rule before publication by contacting:**

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(If necessary)

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Other:

Additional comments: Interested parties can participate in drafting the proposed rules. The board will be conducting rules workshops with interested parties and subject matter experts. The board will use the GovDelivery Occupational Therapy Practice Board list to inform interested parties of opportunities to provide input on proposed rule language.

To subscribe to GovDelivery, please go to: <https://public.govdelivery.com/accounts/WADOH/subscriber/new>. After signing in, please click open the box labeled "Health Systems Quality Assurance." Next click open the box labeled "Health Professions" and then click on "occupational therapy practice board." You may also check the box next to one or more of the other professions listed to receive information related to that specific profession.

**Date:** 10/20/2023  
**Name:** Mary Spores, OT  
**Title:** Chair, Occupational Therapy Practice Board

**Signature:**  
