

March 21, 2025

Representative Jonathan Warrey  
Chairman, House Industry, Business, and Labor Committee  
North Dakota State Capitol  
600 East Boulevard Avenue  
Bismarck, ND 58505

**Re: Please Support Senate Bill 2146, Occupational Therapy Licensure Compact**

Dear Chairman Warrey:

On behalf of AOTA, and in collaboration with the North Dakota Occupational Therapy Association, I am writing to ask you to support Senate Bill 2146, which would adopt the Occupational Therapy Practice Interstate Compact (OT Compact). This legislation passed the North Dakota Senate unanimously in January and is now scheduled to be heard by your committee on Monday, March 24.

The American Occupational Therapy Association (AOTA) is the national professional association representing the interests of more than 213,000 occupational therapists, students of occupational therapy, and occupational therapy assistants. AOTA was established to represent the interests and concerns of occupational therapy practitioners and students, and to improve the quality of occupational therapy services.

Much like the existing licensure compacts for nurses, physical therapists, counselors, 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. Existing interstate compacts have been successful in reducing barriers for practitioners who wish to provide services in other states.

The OT Compact utilizes a “mutual recognition” model of interstate practice, whereby Compact member states agree to “recognize” valid licenses issued by other member states. This approach is made possible by the fact that core licensure requirements for Occupational Therapists and Occupational Therapy Assistants are virtually the same across all 50 states. To obtain a compact privilege to practice in a remote state, an occupational therapist or occupational therapy assistant must have a license in good standing in their home state (primary state of residence) and the home state must be a member of the OT compact. A compact privilege is equivalent to a license to practice occupational therapy in the remote member state.

The OT Compact will benefit consumers, our members, and the profession in North Dakota by:

- Enhancing mobility for occupational therapists and occupational therapy assistants;
- Increasing access to occupational therapy services for clients;
- Facilitating continuity of care when clients or practitioners relocate or travel to another state;

- Allowing military personnel and spouses to more easily maintain their certifications when relocating;
- Creating an alternative path to licensure for compact privilege holders who change their primary state of residence between two compact member states;
- Improving communication between states by mandating full participation in a licensing and disciplinary data system, ensuring that all adverse actions and disciplinary sanctions are reported regularly, and facilitating sharing of investigatory information;
- Requiring criminal background checks; and
- Preserving and strengthening the current system of state licensure.

Importantly, the OT Compact preserves each member state's authority to regulate the profession. Practitioners utilizing the OT Compact must abide by the laws and rules of the state in which they are practicing, including adhering to that state's scope of practice.

With these points in mind, we urge you to support Senate Bill 2146. Please feel free to contact me at 240-752-1174 or via email at [dmarkels@aota.org](mailto:dmarkels@aota.org) if you have any questions or need additional information.

Sincerely,

A handwritten signature in cursive script that reads "Daniel Markels".

Daniel Markels  
Manager, State Legislative Affairs Manager  
American Occupational Therapy Association

cc: Members of the House Industry, Business, and Labor Committee