

GEORGIA STATE BOARD OF OCCUPATIONAL THERAPY
Rules Committee WebEx Meeting Minutes
Thursday, July 29, 2025 – 9:00 a.m.

The Georgia State Board of Occupational Therapy Rules Committee met via WebEx on Thursday, July 29, 2025. The following Committee members were present:

Committee Members Present

Robert McClellan, OTR/L, Committee Chair
Betsy McDaniel, OTA, Committee Member
Deborah Hinerfeld, OTR/L, Committee Member

Administrative Staff Present

Adrienne Price, Executive Director
Meagan Doss, Licensing Supervisor

Committee Members Absent

No Committee Members absent.

Attorney General's Office

No Attorney General present.

Administrative Staff Absent

Michelle Hornaday, Board Support Specialist

Visitors Present

Kristen Neville, State Affairs Manager, American Occupational Therapy Association (AOTA)

Call to Order Mr. McClellan called the Committee meeting to order at 9:03 a.m.

OPEN SESSION

Committee Meeting Agenda

Dr. Hinerfeld motioned, Ms. McDaniel seconded, and the Committee voted in favor of the motion to accept the agenda as presented.

Review and Discussion of Board Rules

The Committee purposed to review previous amendments to ensure they are still in compliance with the direction of the Board before requesting that the Board refer the recommended amendments to the Attorney General's Office for Memoranda of Authority. The following amendments were suggested, with the Committee planning to meet August 5, 2025, to further discuss their rationales for their recommendations.

1. Board Rule 671-2-.02 Supervision Defined

Rule 671-2-.02. Supervision Defined

Supervision as used in the law shall mean personal involvement of the supervisor in the direction, guidance, and delivery of occupational therapy by the supervisee, or individual whose work is being overseen.

- (1) The following factors shall be considered by the supervisor when determining the appropriate frequency, methods, and content of supervision:
 - (a) Complexity of the client needs;
 - (b) Number and diversity of clients;
 - (c) Skills and experience of the occupational therapist and occupational therapy assistant;
 - (d) Type and number of practice settings;
 - (e) Requirements for the practice setting;

- (f) Any other regulatory or administrative requirements.
- (2) A supervising occupational therapist is ultimately responsible and accountable for:
- (a) Maintaining an active, unencumbered license or Compact Privilege in Georgia,
 - (b) All client care provided by the persons supervised, to include but not limited to, occupational therapy services provided by:
 - (i) Occupational therapists and occupational therapy assistants;
 - (ii) Students in occupational therapy and occupational therapy assistant programs; and,
 - (iii) Unlicensed personnel who deliver supportive services to the occupational therapist and the occupational therapy assistant.
- (3) A supervising occupational therapy assistant is always accountable and responsible for the actions of all occupational therapy assistants, student occupational therapy assistants, and unlicensed personnel under their supervision.
- (4) It is the responsibility of the licensed occupational therapist or licensed occupational therapy assistant to ensure that a supervisee does not perform duties for which he or she is not trained and/or licensed. The licensed occupational therapist shall also personally review and interpret the results of any habilitative, or rehabilitative procedures conducted by the supervisee.
- (5) Supervision requires initial direction and periodic inspection of the service delivery by the licensed occupational therapist or occupational therapy assistant to include at a minimum:
- (a) Weekly verbal contact and consultation;
 - (b) Monthly review of patient care documentation;
 - (c) Delineation of tasks and responsibilities;
 - (d) An interactive process between the supervising occupational therapist and the occupational therapy assistant to include but not limited to consultation which may include synchronous communication, related to client assessment, reassessment, intervention plan, intervention implementation, and discontinuation of treatment. Cosigning client documents alone does not meet the minimum level of supervision.
- (6) For applicants required to complete supervised clinical experience to obtain a license, the supervising occupational therapist shall provide direct supervision, as defined in Rule 671-2-.03.
- (7) Supervision of Students.
- (a) For Level One, capstone, and baccalaureate project occupational therapy students, direct supervision, as defined in Rule 671-2-.03, is required by a qualified professional.

- (b) For Level Two occupational therapy students, direct supervision, as defined in Rule 671-2-.03, is required from a qualified professional in accordance with the Accreditation Council for Occupational Therapy Education (ACOTE) Standards.

Cite as Ga. Comp. R. & Regs. R. 671-2-.02

Authority: ~~O.C.G.A. Secs. [43-28-3](#), [43-28-7](#), [43-28-12](#).~~

History: Original Rule entitled "Supervision Defined" adopted. F. July 15, 1977; eff. August 4, 1977.

Repealed: New Rule of same title adopted. F. May 24, 1994; eff. June 13, 1994.

The Committee reviewed Board Rule 671-2-.02 Supervision Defined as referred to them by the Board to clarify the definition and levels of supervision to enable practitioners to provide better service and for protection of the public. The policy purpose of the amendment is to clarify supervision in the workplace. The amendment prohibits unsafe practices and fraud by ensuring practitioners perform services in accordance with their skill level and education. The clarification provided will serve to safeguard new graduates, students, and clients from receiving care from practitioners who are not adequately supervised or lack the appropriate skill level and expertise. It further ensures that with adequate supervision in place, the students and/or new graduates can establish the skills necessary for their roles as competent practitioners.

The amendment carries out the policy objectives expressed in statute by protecting the public through the provision of a clear definition of supervision which includes a clear expectation that supervisors and supervisees are responsible for preventing harm to the consumer. The statute provides for the Board to promulgate rules regarding supervision.

The independent support of the recommended amendments can be found in the Accreditation Council for Occupational Therapy Education (ACOTE) standards. Additional input in drafting the language was also provided by Kristen Neville, State Affairs Manager, American Occupational Therapy Association (AOTA). The committee determined that it will table their discussion of the rationales for the remaining rule amendments and resume the discussions during the August 5, 2025 meeting due to time constraints relative to the ability to maintain a quorum of the Committee during today's meeting.

2. BR 671-2-.03. Direct Supervision Defined

Rule 671-2-.03. Direct Supervision Defined

- (1) Direct Supervision as used in the Law shall mean that the supervisor is physically on-site, in-person, and able to respond quickly to the needs of the client or supervisee. It requires specific delineation of task and responsibilities by a licensed Occupational Therapist or Occupational Therapy Assistant to the supervisee.
 - (a) It is the responsibility of the licensed occupational therapy practitioner to ensure that the supervisee does not perform duties for which he/she is not trained; and,
 - (b) It is ultimately the responsibility of the occupational therapist to personally review and interpret the result of any habilitative or rehabilitative procedures conducted by the supervisee.
- (2) Direct Supervision is required for applicants who are practicing under a limited permit issued by the Board.
- (3) Direct Supervision may decrease over time to supervision, as defined in Rule 671-2-.02, if the supervisor has determined that the supervisee has demonstrated service competency and the supervisee is not subject to paragraph 2 of this rule.

Cite as Ga. Comp. R. & Regs. R. 671-2-.03

~~Authority: O.C.G.A. Secs. 43-28-3, 43-28-7, 43-28-12.~~

~~History: Original Rule entitled "Direct Supervision Defined" adopted. F. July 15, 1977; eff. August 4, 1977.~~

~~Repealed: New Rule of same title adopted. F. Jan. 29, 1997; eff. Feb. 18, 1997.~~

3. BR 671-3-.01 Application. Amended

Ga. Comp. R. & Regs. r. 671-3-.01 Application. Amended

Georgia Administrative Code

Department 671. GEORGIA STATE BOARD OF OCCUPATIONAL THERAPY

Chapter 671-3. LICENSE REQUIREMENTS

Current through Rules and Regulations filed through January 9, 2025

Rule 671-3-.01. Application. Amended

- (1) Any occupational therapist or occupational therapy assistant who plans to practice as a licensed occupational therapist or licensed occupational therapy assistant in the State of Georgia shall apply for licensure to the Board, on forms provided by the Board.
- (2) Proof of lawful presence in the U.S. must be documented by:
 - (a) submitting an identification document listed as a secure and verifiable document on the list maintained by the Office of the Georgia Attorney General under O.C.G.A. § [50-36-1](#); and,
 - (b) an affidavit of citizenship that complies with the provisions of federal immigration law and O.C.G.A. § [50-36-1\(f\)\(1\)\(B\)](#).
- (3) A transcript providing the area of study and degree conferred must be provided from an accredited educational program in occupational therapy recognized by the board.
- (4) Satisfactory results from a fingerprint record check report conducted by the Georgia Crime Information Center and the Federal Bureau of Investigation, as determined by the Board. The applicant shall be responsible for all fees associated with the performance of such background.

Applicants must provide proof of passing the NBCOT examination for occupational therapists or occupational therapy assistants. Applicants who fail the examination three times or more may be required
- (5) to demonstrate competency in a manner deemed appropriate by the board.
- If the applicant has been employed in the field of occupational therapy, a verification of employment form must be provided from the employer. If the applicant has not practiced in the field of occupational therapy within five (5) years, the applicant will be required to complete a supervised clinical experience.
 - (a) Applicants required to complete a supervised clinical experience must submit Limited Permit Supervised Clinical Practice Agreement Form.
 - (b) Upon completion of the supervised clinical experience, an applicant must cause the supervisor to submit a Supervised Clinical Practice Evaluation Form verifying the 320 hours of clinical experience under the supervision of a licensed occupational therapist, pursuant to Rule 671-3-.06, for Board approval.

Applicants for occupational therapy or occupational therapy assistant licensure in Georgia must meet all requirements for licensure as defined within the statute and Board Rules prior to issuance of a license.
- (7)

~~Cite as Ga. Comp. R. & Regs. R. 671-3-.01~~

~~Authority: O.C.G.A. §§ [43-1-3](#), [43-1-19](#), [43-1-25](#), [43-28-7](#), [43-28-8](#), [43-28-9](#), [43-28-10](#), [43-28-11](#), [50-36-1](#).~~

~~History. Original Rule entitled "Application" was filed on July 15, 1977; effective August 4, 1977.
Amended: New title "Application. Amended." F. June 1, 2017; eff. June 21, 2017.~~

4. Board Rule 671-3-.08 Renewal of License/Penalties/Continuing Education Requirements. Amended

Ga. Comp. R. & Regs. r. 671-3-.08 Renewal of License/Penalties/Continuing Education Requirements. Amended

Georgia Administrative Code

Department 671. GEORGIA STATE BOARD OF OCCUPATIONAL THERAPY

Chapter 671-3. LICENSE REQUIREMENTS

Current through Rules and Regulations filed through January 9, 2025

Rule 671-3-.08. Renewal of License/Penalties/Continuing Education Requirements. Amended

- (1) A license issued by the Board shall expire on March 31st of even numbered years. The license may be renewed upon submission of the renewal application and payment of the required fee, provided all requirements have been met. Refer to fee schedule.
- (2) A license that is not renewed on or before March 31st of the renewal year shall be deemed lapsed. A licensee may apply for late renewal of a license from April 1st through April 30th of the renewal year upon payment of a late renewal fee, submission of proof of continuing education as established by Board rules and completion of all appropriate forms.
- (3) As of May 1st, of the renewal year, the license of an applicant who has not applied for renewal is expired and revoked by operation of law. An application for reinstatement shall be required as provided for in Rule [671-3-.09](#) in order to seek reinstatement of a lapsed license to practice in this State.
- (4) Except as otherwise provided, each licensee is required to complete during each two (2) year renewal period a minimum of twenty-four (24) continuing education (CE) hours prior to the expiration date of the license. The two (2) year renewal period begins April 1st of even numbered years and ends March 31st of even numbered years. Failure to complete continuing education prior to expiration date can result in disciplinary action.

Prior approval of continuing education courses is not required. Acceptable professional continuing education activities shall include activities relevant to occupational therapy practice that can be deemed to update or enhance knowledge and skills required for competent performance beyond entry level occupational therapy. Unacceptable activities include, but are not limited to:
 - (a) Orientation,
 - (b) Meetings for purposes of policy decisions,
 - (c) Non-educational meetings,
 - (d) Annual Compliance training,
 - (e) Cardiopulmonary resuscitation (CPR) courses.
- (5)

A continuing education hour is defined as actual time spent in instruction or organized learning experiences excluding meals, breaks, welcome/introductions, and business meetings.

- (6)
 - (a) At least twelve (12) hours of the required twenty-four (24) continuing education hours must be on a topic related to direct patient care. This includes occupational therapy assessment, treatment planning, occupational therapy implementation and diagnostic related information. This must include attendance at live presentations such as workshops, seminars, conferences, or formal academic coursework, or real-time, interactive webinars. To qualify as a real-time, interactive webinar, the licensee must have the ability to ask questions, receive an answer, and interact with other attendees at the time the session is taking place. It may not be a pre-recorded session.

- (b) Each licensee must complete a minimum of two (2) hours of the required twenty-four (24) continuing education hours in the ethics of occupational therapy practice. These hours may be obtained online.
 - (c) A maximum of ten (10) of the required twenty-four (24) can be in "General" continuing education hours may be obtained by Level II fieldwork supervision, published professional writing and instructional presentations, pre-recorded electronic or web-based courses, formal self-study courses, satellite broadcasts, computer learning activities, webinars, or viewing videotapes in a professional setting. These hours may also be related to administration, supervision, documentation, quality assurance and research.
- (7) An individual who is applying for licensure in Georgia for the first time (never having held a Georgia OT or OTA license) and who is licensed during the second year of the biennium renewal period is not required to meet continuing education requirements for that initial renewal period only.
- (8) Each licensee randomly selected for a CE audit must submit to the Board supporting documentation as specified in this rule.
- (9) Persons licensed to practice as an occupational therapist or an occupational therapy assistant, or persons who file an application for reinstatement of licensure, must submit documentation of completed continuing education courses and experiences for renewal or issuance of a license.
- (10) Licensees and applicants for reinstatement must register earned CE credits for courses and experiences with an online recording and reporting system approved by the Office of Secretary of State. Licensees and applicants must register with the approved continuing education tracking solution to document CE credits for license renewal and reinstatement.
- (a) The Office of Secretary of State has approved CE Broker, Inc. as the continuing education tracking solution to monitor compliance of licensees with applicable continuing education requirements.
 - (b) Licensees and applicants shall incur no additional costs from CE Broker, Inc. for using this service.
 - (c) Every licensee or applicant subject to the rules of the Georgia State Board of Occupational Therapy shall be deemed to have given such person's consent to the Board and its representatives to access their CE record retained within the approved continuing education tracking solution for the purposes of auditing and verifying completion of the Board's continuing competency requirements.
 - (d) If a licensee or applicant has not registered earned CE credits within the approved continuing education tracking solution, the licensee or applicant may be subject to disciplinary action.
- (11) Procedures for verifying to the Board that the continuing education requirements for licensure renewal have been met:
- (a) Respond appropriately to questions on renewal of license application;
 - (b) Retain original continuing education documentation in personal files to submit to the Board if requested for a continuing education audit;

- (c) Documentation as specified in this rule must be maintained by the licensee for no less than four (4) years from the beginning date of the two (2) year renewal period during which the hours were taken.
- (12) Documentation of continuing education which the Board deems as acceptable proof of completion includes the following:
- (a) For continuing education courses that include attendance and participation at a live presentation such as a workshop, seminar, conference, formal academic course, or in-service educational program:
 - 1. A certificate of completion or similar documentation signed by a program official, specifying the course was a live presentation or real interactive webinar, and,
 - 2. A program or course description including sponsor, course title, date(s), program objectives/learning outcomes, content description, and agenda or schedule. A shortened description may be accepted for programs specifically exempted by the Board such as AOTA and GOTA Conferences. If submitting formal academic coursework, a transcript reflecting a passing score in the course and the course syllabus is required,;
 - (b) For "General" continuing education as referenced in this rule, if obtained at a conference, seminar, workshop, live presentation, academic course or in-service educational program required documentation is as noted above. All other types of courses must include:
 - 1. Explanation of the relationship of the activity to occupational therapy and your professional growth.
 - 2. Date(s) and clock hours of the activity;
 - 3. Other information as may be requested.
 - (c) A description of the fieldwork including name and type of facility, name of the fieldwork educator and times spent in direct supervision of the student is required in order to receive credit for serving as the primary clinical fieldwork educator for Level II occupational therapy and occupational therapy assistant fieldwork students.
 - (d) For published professional writing, applied research, and instructional presentations, as referenced in this rule, including first time or significantly revised presentations or an academic class session, workshop, seminar, in-service or professional meeting program session:
 - 1. Description of the presentation or research including location, title, date, hours of presentation, general content description, and type of audience; and,
 - 2. Verification of the presentation, research or formal thank you note signed by the sponsor or program official.
 - (e) Documentation of pre-recorded electronic or web-based course, formal self-study courses, satellite broadcasts, computer learning activities or viewing of videotapes in a professional setting must include:

1. Verified instructional time by the course sponsor, a certificate of completion or similar documentation specifying “pre-recorded or web-based” signed by the program official; and,
- (f) 2. A program description including sponsor, course title, date(s), program objectives/learning outcomes, and content description

Continuing education should be documented on the appropriate board form, available on the Board website, upon request by the Board.

Cite as Ga. Comp. R. & Regs. R. 671-3-.08

In considering a request of the Board for the Committee to discuss the possibility of adding mentorship as a category that can be awarded CE credit, the Committee recommended to advise the Board of not being in favor of accepting mentorships to satisfy CE requirements beyond level 2 fieldwork. The Committee determined that it is not feasible for the Board to engage in the process of approving or evaluating the qualifications for mentors for the various practice settings. The Board would have to not only develop the evaluation and approval process but it would also have to develop forms and potentially create an online application process within GOALS which has the potential to be burdensome and expensive to board, board staff, and the Office of Secretary of State in time and finances. In level 2 fieldwork the schools preapprove and ensure the fieldwork supervisor is qualified according to national standards which alleviates the aforementioned burden and expense. Whereas, mentorship has the potential to enhance the competence of the mentor, it would be difficult to assess their level of increased competency from their mentoring experience. In addition, it has been the longstanding position of the Board to allow the trusted and nationally certified sources of occupational therapy education to develop and provide high-quality professional development and continuing education experiences for licensees.

5. Board Rule 671-3-.14. Reciprocity

Rule 671-3-.14. Reciprocity

- (1) Pursuant to O.C.G.A. § 43-28-11, the board may waive the examination and grant a license to any applicant who shall present proof of current licensure as an occupational therapist or an occupational therapy assistant in another state, the District of Columbia, or territory of the United States, which requires standards for licensure considered by the board to be equivalent to the requirements for licensure of this article.
- (2) Applicants by reciprocity must submit:
 - (a) An affidavit stating that the applicant is a U.S. citizen or an affidavit stating that the applicant is lawfully present in the U.S. under federal immigration law and O.C.G.A. § 50-36-1(f)(1).
 - (b) A secure and verifiable document on the list maintained by the Office of the Georgia Attorney General under O.C.G.A. § 50-36-1;
 - (c) A transcript providing the area of study and degree conferred must be provided from an accredited educational program in occupational therapy recognized by the board.

- (d) Satisfactory results from a fingerprint record check report conducted by the Georgia Crime Information Center and the Federal Bureau of Investigation, as determined by the Board. The applicant shall be responsible for all fees associated with the performance of such background.
- (e) Proof of passing an occupational therapy examination which is not administered by the National Certification Board in Occupational Therapy (NBCOT) that is approved in another state, the District of Columbia, or territory of the United States.
- (f) Verification of current licensure, in good standing, from another state, the District of Columbia, or territory of the United States, which requires standards for licensure considered by the board to be equivalent to the requirements in Georgia.
- (g) If the applicant has been employed in the field of occupational therapy, a verification of employment form must be provided from the employer. If the applicant has not practiced in the field of occupational therapy within five (5) years, the applicant will be required to complete a supervised clinical experience.
 - (i) Applicants required to complete a supervised clinical experience must submit Limited Permit Supervised Clinical Practice Agreement Form.
 - (ii) Upon completion of the supervised clinical experience, an applicant must cause the supervisor to submit a Supervised Clinical Practice Evaluation Form verifying the 320 hours of clinical experience under the supervision of a licensed occupational therapist, pursuant to Rule 671-3-.06, for Board approval.

Robert McClellan left the meeting at 12:57 p.m.

6. Board Rule 671-6-.02 Requirements, Policy A1 Policy for Applications for Licensure

Ga. Comp. R. & Regs. r. 671-6-.02 Requirements

Georgia Administrative Code

Department 671. GEORGIA STATE BOARD OF OCCUPATIONAL THERAPY

Chapter 671-6. CERTIFICATION FOR USE OF PHYSICAL AGENT MODALITIES

Current through Rules and Regulations filed through November 10, 2021

Rule 671-6-.02. Requirements for Use of Physical Agent Modalities

- (1) Any occupational therapist and occupational therapy assistant who wishes to utilize O.T. techniques involving physical agent modalities, must document, successful completion of a minimum of 90 contact hours of instruction or training approved by the Board which covers:
 - (a) Principles of physics related to specific properties of light, water, temperature, sound, or electricity, as indicated by selected modality;
 - (b) Physiological, Neurophysiological, and Electrophysiological, changes, as indicated, which occur as a result of the application of selected modality;
 - (c) The response of normal and abnormal tissue to the application of the modality;
 - (d) Indications and contra indications related to the selection and application of the modality;
 - (e) The guidelines for treatment or administration of the modality within the philosophical framework of occupational therapy;

- (f) The guidelines for educating the patient including instructing the patient to the process and possible outcomes of treatment, including risks and benefits;
 - (g) Safety rules and precautions related to the selected modality;
 - (h) Methods of documenting the effectiveness of immediate and long-term effects of treatment; and
 - (i) Characteristics of the equipment including safe operation, adjustment, and care of the equipment.
- (2) No less than 36 contact hours must be directly related to the specific theories and practical application of physical agent modalities.
- (3) Acceptable instruction or training shall include any activity relevant to the practice of physical agent modalities in occupational therapy and may include formal academic education, conferences, workshops, seminars, web-based instructions, and in-service education.
- (4) Each occupational therapist and occupational therapy assistant is responsible for submitting documentation of training. Documentation shall include:
- (a) Proof of 90 hours of instruction or training. Of the 90 hours required:
 - (1) Occupational therapists shall receive 54 hours towards modalities certification based upon completion of entry level education in occupational therapy.
 - (2) Occupational therapy assistants shall receive 36 hours towards modalities certification based upon completion of entry level education in occupational therapy.
 - (b) The remaining hours may be reported by:
 - 1. Identification of the specific course or training where the therapist learned content related to each subject area identified in (1)(a-i).
 - 2. A statement of attendance or a copy of the certificate of completion, that shows the title of program, hours of the program, date the program was taught, the signature of a designated program official, and a brochure or program outline must be provided.
 - 3. In-service training by attendance at a live presentation offered by a fellow practitioner or supervisor certified in PAMs. In-service training must be recorded in increments greater than or equal to 30 minutes. At no time should these in-services be conducted as part of patient care.
 - (c) No more than 12 hours of asynchronous coursework may be submitted to satisfy the 90 hours required for PAMs certification.
 - (d) in accordance with O.C.G.A. Sec. 43-28-8(a)(1), none of the 90 hours required for PAMs certification can be obtained while practicing under a limited permit issued by the Board or supervised clinical hours offered through any provider.
 - (e) Additional documentation may be requested by the Board, if deemed necessary.

- (5) Anyone who holds a Certified Hand Therapy (CHT) credential is considered by the Board to have met the requirements for Physical Agent Modalities (PAM) certification and may be administratively approved upon submission of application.

- (6) Anyone who holds a dual degree of Physical Therapy and Occupational Therapy credentials is considered by the Board to have met the requirements for Physical Agent Modalities (PAMs) certification and may be administratively approved upon submission of application.

Cite as Ga. Comp. R. & Regs. R. 671-6-.02

Authority: O.C.G.A. §§ ~~43-28-3(9), 43-28-7, 43-28-8.1, 43-28-12, 43-1-3 and 43-1-25.~~

History: Original Rule entitled "Requirements" adopted. F. Nov. 20, 1991; eff. Dec. 10, 1991.

Amended: F. Jan. 20, 2015; eff. Feb. 9, 2015.

Note: Correction of non-substantive typographical error in sub-paragraph (1)(c), "nor mal" corrected to "normal"; sub-paragraph (4)(a), "w here" corrected to "where", as requested by the Agency. Effective Oct. 11, 2016.

The Committee determined that there should be no more than 12 hours of asynchronous coursework to satisfy the 90 hours required for PAMs as modalities is a hands-on practice. They propose to limit asynchronous coursework because it is independent learning, and the Committee remarked that individuals who have dynamic training and/or dynamic education which requires interactions for questions, answers, conversations, and discussions for skill development tend to perform best once they begin practicing PAMs without direct supervision.

In accordance with O.C.G.A. Sec. 43-28-8(a)(1), none of the 90 hours required for PAMs certification can be obtained while practicing under a limited permit issued by the Board or supervised clinical hours offered through any provider. It is in the best interest of the applicant and the client for applicants to concentrate on obtaining and maintaining the minimum competency level to engage in the safe practice of occupational therapy before attempting to achieve PAMs certification which will require them to practice at an increased level of skill, knowledge and expertise. Additionally, it is prohibited according to statute [O.C.G.A. 43-28-8(a)(1)]. The Committee also discovered that it has been some time since the Board evaluated the level of education that is offered and obtained by graduates of an occupational therapy assistant (OTA) program. In conducting such review, the Committee recommended that OTAs receive more credit for towards PAMs certification from their entry level educational programs.

Review and Discussion of Board Policies

1. Policy A1 – Policy for Applications for Licensure

POLICY A1

Category: Applications **Policy:** ■
Title: Policy for Applications for Licensure **Procedure:** ■

Statutory Basis: O.C.G.A. §§ 43-28-7; 43-28-8; 43-28-8.1; 43-28-9; 43-28-10; 43-28-11; 43-28-12; 43-28-14

Rule Basis: Chapters 671-3 and 671-6

- Administrative Authority has been granted to the staff to issue licenses and Limited Permits where answers to the conviction question is “No” and the applicant has met all licensure requirements subject to board final approval.
- Staff has been granted Administrative Authority to accept the NBCOT Online Certification Report as a Primary Source Verification of Certification.

***HISTORY:** Policy revised at the February 7, 2014 meeting; Policy revised at the May 15, 2015 meeting; Policy revised at the August 7, 2015 meeting; Policy revised at the February 19, 2016 meeting; Policy revised at the May 13, 2016 meeting. Revised at the February 26, 2021 meeting. Approved by Governor July 13, 2022.*

2. Policy A5 – Staff Approval of Applications for Licensure and Renewal Related to Criminal Offenses

POLICY A5

Category:	Applications	Policy: ■
Title:	Staff Approval of Applications for Licensure and Renewal Related to Criminal Offenses	Procedure: ■
Statutory Basis:	O.C.G.A. §§43-1-19(a)(j);43-28-7; 43-28-8; 43-28-8.1; 43-28-9; 43-28-10; 43-28-11; 43-28-12; 43-28-14	
Rule Basis:	BR 671-3-.01through 671-3-12; 671-6-.01 through 671-6-.03	

The Board policy below grants administrative authority to staff to review and issue licenses when an application meets all criteria as outlined in the law and board rules. When an application reveals that the applicant has disclosed the existence of criminal conviction(s) staff is granted administrative authority to process the application in accordance with this policy. Any license issued in accordance with this policy shall be ratified by the Board during the next scheduled board meeting.

(1) Initial Applications

- (a) Sexual Offenses
 - i. If an applicant has been convicted of a misdemeanor sex crime, the application shall be referred for presentation before the Board
 - ii. If an applicant has been convicted of a felony sex crime, the application shall be referred for presentation before the Board.
- (b) Violent Felonies. If probation, parole, or supervised release is complete and the applicant has been convicted of no more than one violent felony, refer to the Cognizant for review. If there is no nexus to occupational therapy, the Cognizant may recommend administrative issuance of the license.
- (c) Non-Violent Felonies.
 - i. If probation, parole, or supervised release is complete and the applicant has been convicted of non-violent felonies, refer to the Cognizant for review. If there is no nexus to occupational therapy, the Cognizant may recommend administrative issuance of the license.
 - ii. If the applicant has been convicted of no more than one non-violent felony more than 15 years ago, court documents will be required, and the license can be administratively issued.
- (d) Mixed Felony Convictions. If the applicant has been convicted two or more felonies (both non-violent and violent), the application shall be referred to Legal Services for review and presentation of a recommendation to the Board in accordance with O.C.G.A. 43-1-19(q)(1&2).
- (e) Misdemeanor Convictions. If the applicant has had two (2) non-DUI misdemeanor convictions that occurred more than ten (10) years ago, court documents are required, but the license can be administratively issued.
- (f) Misdemeanor Convictions for DUI. If the applicant has had no more than two (2) misdemeanor DUI convictions, occurring more than 10 years ago, court documents are required, and the license can be administratively issued.

(2) Renewing or Reinstating Applicants

- (a) Applicants for license renewal and reinstatement are subject to the policies for initial applicants as described herein.
- (b) Board staff may administratively reinstate or renew a license when the applicant has convictions if:

- (i) The applicant previously submitted the same convictions to the Board; and,
- (ii) The Board previously reviewed those convictions.
- (c) If an applicant for renewal or reinstatement discloses a misdemeanor or felony conviction which occurred while the applicant was reinstated or renewed, then the application will be processed in accordance with the guidelines established in paragraph (1)(a-f) of this policy.

(3) Documentation.

- (a) Board staff will continue to request final disposition, sentence documentation, and/or official letterhead from probation, parole, or supervising officers for applicants and licensees with convictions in accordance with this policy and direction of the Board.
- (b) If information concerning convictions is not readily apparent in the court documents received by staff, staff shall refer the application to the Board. The Board will determine the appropriate course of action.

(4) Failure to Disclose. When an applicant fails to disclose an arrest or conviction, staff may administratively issue the license in accordance with the policies set forth herein if the arrest or conviction occurred:

- a. Over 10 years ago; however, in such cases, a Letter of Concern shall also be sent as a reminder to applicants that they shall disclose all convictions and failure to do so in the future may result in the Board exercising its right to sanction the license.
- b. Less than 10 years ago, the application shall be referred to Legal Services for a Public Consent Order with terms and conditions to include a \$500 fine and 2 hours of ethics in occupational therapy which may not be used to meet CE requirements for license renewal. Fine must be paid within 90 days of the docket date of the order. The referral decision and issuance of the order will be ratified by the Board at the next scheduled meeting.

(5) Incarcerated Applicants. When an applicant is incarcerated, the application shall be presented to the Board for review.

(6) Fraudulent Documentation. When an application is submitted with documentation suspected to be fraudulent, the application may be referred to the Board for review.

(7) Other Applications. Any application which does not fall within the parameters set forth in this policy shall be referred to the Board for review.

***HISTORY:** Policy adopted at the May 17, 2013 meeting; Amended February 7, 2014.*

3. Policy A9 – Limited Permits

POLICY A9

Category: Applications Policy: ■
Title: Limited Permits Procedure: ■

Statutory Basis: O.C.G.A. §§ 43-28-10(c) and 43-28-12

Rule Basis: 671-2-.02, 671-2-.03, 671-3-.06(3), and 671-3-.09

- (1) The Georgia State Board of Occupational Therapy designates a Cognizant Board Member to:
 - (a) Approve all limited permit forms and supervision agreements (Supervised Clinical Experience Agreement Form or Limited Permit Supervised Clinical Practice Agreement Form); or,

- (b) Refer the limited permit forms and supervision agreements to the full board for consideration during the next regularly scheduled meeting if:
 - 1. The documentation submitted is unclear, misleading, deceptive, false or fraudulent;
 - 2. The supervisor has been sanctioned in the past by the Board; or,
 - 3. The facility, agency, or practice area where the supervised clinical practice is scheduled to take place appears inadequate.
- (2) If the issuance of a limited permit is approved by the Cognizant:
 - (a) A letter stating that all supervision must be in compliance with the statutes and rules indicated within this policy will be sent to the occupational therapist who has been approved as the supervisor; and,
 - (b) A list of persons who received a limited permit based on this policy will be presented to the Board for a vote during a regularly scheduled meeting.
- (3) The license may be administratively issued if the Supervised Clinical Practice Evaluation Forms reflects that the supervisee has satisfied the requirements. If the form states otherwise, Board review is required.

History: Policy adopted at the November 13, 2020 meeting.

Adjournment No further business was discussed, and the Committee meeting adjourned at 4:23 p.m.

Minutes recorded by: Michelle Hornaday, Board Support Specialist
Minutes reviewed and edited by: Meagan Doss, Licensing Supervisor & Adrienne Price, Executive Director
Minutes approved on: August 15, 2025

ROBERT McCLELLAN
COMMITTEE CHAIR

ADRIENNE PRICE
EXECUTIVE DIRECTOR

ROBERT McCLELLAN
BOARD CHAIR