

GEORGIA STATE BOARD OF OCCUPATIONAL THERAPY
Rules Committee WebEx Meeting Minutes
Thursday, January 29, 2026 – 12:00 p.m.

The Georgia State Board of Occupational Therapy Rules Committee met via WebEx on Thursday, January 29, 2026. 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
Michelle Hornaday, Board Support Specialist
Sherry Strong, Complaint & Compliance Analyst

Committee Members Absent

No Committee Members absent.

Attorney General's Office

No Attorney General present.

Visitors Present

No visitors present.

Call to Order Mr. McClellan called the Committee meeting to order at 12:16 p.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 that Require Employment Verifications

During the November 7, 2025 Board meeting, the Rules Committee was tasked to review all Board Rules that require a verification of employment and consider making additional amendments and rationales to those rules and policy amendments accepted by the Board during the August 15, 2025 including language that will provide alternative methods -for evaluating an applicant's last date of practice. The request to consider making such amendments was made due to an increasing number of applicants who report being unable to have their former employers complete a verification of employment form on their behalf. The following amendments were suggested and referred to the full Board for review during their meeting February 6, 2026.

1. Rule 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, as prescribed 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.
- (5) 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 to demonstrate competency in a manner deemed appropriate by the board.
- (6) If the applicant has been employed in the field of occupational therapy, verification of employment must be provided. 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.
- (7) 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.

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.

The Committee made suggested amendments to Board Rule 671-3-.01. Application. Amended for the purpose of clarifying the current requirements to the applicant for the submission of an application for licensure, and to further amend the rule to reflect the changing technology and the division's transition to the Georgia Online Application Processing System (GOALS), in conjunction with the amendments and rationales previously discussed in Rules Committee meetings February 4, 2025, May 29, 2025, July 7, 2025, and August 5, 2025. The additional amendments will also provide clarification to the applicant on the process when applying for licensure in Georgia.

The purpose of the amendments to the rule is to prohibit and prevent unsafe practices and/or fraud by requiring the proof of previous employment in the field of occupational therapy in a manner that ensures that the applicant does not misrepresent their practice and skill while also providing alternative methods for applicants to verify active practice in instances whereby they are unable to have their employer complete a verification of employment form. The rule amendment clarifies the required proof of passing the National Board for Certification in Occupational Therapy (NBCOT) national exam, provides transcripts from an accredited program ensuring the applicant meets the minimum qualifications for licensure and to practice safely. The amendment also informs applicants that a clean, nationally verified fingerprint background check result is required and that all information is provided by reputable sources.

Applicants who fulfill these requirements are likely to possess the minimum level of competence to practice in the State of Georgia thus expanding access to care and services. The amendment removes information asymmetries for consumers by more clearly defining what is required for licensure in the State of Georgia.

The amendment carries out policy objectives that are expressed in statute as an application for licensure is a legal requirement, and this amendment better details the process for applying for licensure and outlines the means by which a person may satisfy their requirements. The Board is charged with licensing individuals who are qualified and the amendment better fulfills the Board's duty in carrying out policy objectives.

Multiple variations for the proof of employment were considered, and this amendment details the best practice in moving forward while using a paperless application process with the institution of the GOALS licensing portal. Independent support comes from confusion on the part of the applicants when they are unable to garner cooperation from previous employers to provide employment verification. The amendment affects both applicants for licensure and Board staff in the simplification of the application process and in reduction of administrative burden. The detailed requirements further increase efficiency while exercising the Board's due diligence in properly vetting applicants.

The Committee entered into a discussion regarding the economic impact of the amendment and determined there is a positive economic impact by simplifying the application process and decreasing barriers, which gets Georgians to work faster.

2. Rule 671-3-.09 Reinstatement of a License

Rule 671-3-.09. Reinstatement of a License

- (1) Reinstatement of an expired license is within the discretion of the Board.
- (2) A license may be reinstated by submission of the following:
 - (a) Application for Reinstatement with appropriate fee; and
 - (b) Documentation of the completion of twenty-four (24) continuing education hours in accordance with Board rule **671-3-.08 Renewal of License/Penalties/Continuing Education Requirements** obtained within the two (2) year period prior to the date of the application.
 - (c) Verification of current license in another state, if applicable; and
 - (d) Verification of Employment verifying last date of practice in Occupational Therapy.
- (3) An applicant for reinstatement of a license who has **not** practiced within five (5) years must also submit the following:
 - (a) Form A (Supervised Clinical Experience) A complete Form B (Limited Permit Supervised Clinical Experience Form) indicating who will provide 320 hours of direct supervised clinical experience with and a description of the training which meets the requirements of an accredited or approved occupational therapy or occupational therapy assistant curriculum for Board approval. Upon approval by the Board a limited permit will be issued.
 - (b) Upon completion of the direct supervised clinical experience, an the applicant's supervisor must submit a complete Form C (Supervised Clinical Practice Evaluation Form) B (Certification of Completion of Supervised Clinical Experience) verifying the 320 hours of clinical experience practice was completed under the direct supervision of a licensed occupational therapist, pursuant to Rule 671-3-.06(3), and meets the standards indicated on the form. Upon for Board approval by the Board, a license will be issued.
 - (c) If the Board receives an evaluation indicating that the applicant exhibited unprofessional conduct, the Board may exercise any of the powers granted in Code Sections 43-1-19 and 43-28-13 in the manner provided by the rules and regulations adopted by the Board and in accordance with Chapter 13 of Title 50, the "Georgia Administrative Procedure Act."

Cite as Ga. Comp. R. & Regs. R. 671-3-.09

Authority: O.C.G.A. Secs. [43-1-19](#), [43-1-25](#), [43-28-7](#), [43-28-13](#), [43-28-14](#).

History. Original Rule entitled "Restored License" adopted. F. July 15, 1977; eff. August 4, 1977.

Repealed: New Rule of same title adopted. F. July 1, 1982; eff. July 21, 1982.

Repealed: New Rule of same title adopted. F. July 11, 1984; eff. July 31, 1984.

Repealed: New Rule of same title adopted. F. Apr. 14, 1988; eff. May 4, 1988.

Amended: F. May 13, 1991; eff. June 2, 1991.

Repealed: New Rule of same title adopted. F. Jan. 28, 1994; eff. Feb. 17, 1994.

Repealed: New Rule of same title adopted. F. Dec. 2, 2002; eff. Dec. 22, 2002.

Repealed: New Rule of same title adopted. F. May 4, 2005; eff. May 24, 2005.

Repealed: New Rule of same title adopted. F. Aug. 4, 2006; eff. Aug. 24, 2006.

Amended: F. Mar. 25, 2008; eff. Apr. 14, 2008.

Repealed: New Rule of same title adopted. F. May 25, 2010; eff. June 14, 2010.

Repealed: New Rule entitled "Reinstatement of a License. Amended" adopted. F. Feb. 22, 2012; eff. Mar. 13, 2012.

The Committee reviewed Board Rule 671-3-.09 Reinstatement of a License, and their suggested amendments will provide clarification to applicants on the reinstatement process as well as improve process efficiency. The policy purpose of the rule amendment serves to prohibit and prevent unsafe practices and fraud by ensuring applicants for reinstatement who have not been practicing in the last five (5) years, are meeting the standard of care by completing the supervised hours requirement. Additionally, for those who let their license lapse and are trying to reinstate it, previous employment and safe practice can be verified which ensures the Board is reinstating the licenses of those who remain competent practitioners.

The Committee considered multiple variations and determined that the amendment will fall in line with other state requirements. The independent support for the Committee recommendations comes from comments by stakeholders, national standards, and current changes in technology. The rule will affect stakeholders and executive staff by decreasing the administrative burden and application processing time.

The Committee reviewed the economic impact of Rule 671-3-.09 Reinstatement of a License and stated it will facilitate more practitioners out in the community practicing in the field of occupational therapy thereby expanding the workforce, which benefits both individual licensees and businesses alike.

Adrienne Price joined the meeting at 1:10 p.m.

3. 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 must be provided. 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.

The Committee reviewed Board Rule 671-3-.14. Reciprocity created during the July 29, 2025 Rules Committee meeting and stated the additional amendment to the new rule will remove barriers to licensure by no longer specifying that a verification of employment form is the only means to provide active practice in the field of occupational therapy. The rule retains the verification of employment requirement, which prohibits and prevents unsafe practices by verifying work experience; but by removing the word “form” it allows applicants to submit other documents which may accomplish the same goal. The allowance of alternative ways to satisfy the requirement will still help to ensure applicants are competent practitioners and will prove to make the application process more efficient as it will no longer be necessary for applicants to submit a petition for rule waiver and/or variance of the requirement to provide only the form when it is not possible for them to do so.

The new rule as amended and presented provides the clearest, most simple language and is the least restrictive method to accomplish the State’s policy by providing alternative options to prove employment history.

National standards and the change in technology both provide independent support for the Committee’s recommendation as access to a notary for the provision of the current verification of employment form has decreased and proven to be problematic. The new rule will positively affect stakeholders and executive staff by increasing efficiency. The Committee determined the new rule amendment creates a positive economic impact by getting more Georgians to work, with a shorter application processing time.

OT Policies and Procedures – Policy A1

Policy A1 Policy for Applications for Licensure

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.
- A 320-hour supervised clinical experience is not required if an applicant can demonstrate licensed practice in another jurisdiction within the past.
- Staff has been granted Administrative Authority to accept the NBCOT Online Certification Report as a Primary Source Verification of Certification.
- Administrative Authority is granted to the staff to accept an employment affidavit along with at least one of the following supporting documents in lieu of a verification of employment form:
 - Tax documents to include but not limited to W-2 or 1099 forms,
 - A final pay stub, or,
 - A copy of an employment contract.

~~• Physical Agent Modalities: applicants for certification to use Physical Agent Modalities may apply count hours of modalities related instruction in from their academic programs. Occupational therapists may check the paragraph on the application form and receive 54 general hours towards certification. In addition they may receive credit for additional modality specific hours if the required documentation is submitted, i.e. may grant up to 12 additional hours for a specific PAMs course which is integrated into an applicant’s curriculum (1 credit hour = 16 hrs). Documentation for specific modality coursework must include dates, session start and stop times, topics, instruction and course or session objectives. Proof of attendance may be a signed statement of attendance by the instructor for each course submitted, a copy of the official grade report or a copy of the transcript. Additional in-service training must be obtained by attendance at a live presentation recorded on the PAM reporting form in increments greater than or equal to 30 minutes but less than or equal to 3 hours.~~

- ~~• 37 hours are granted from attending a PAMPCO course.~~
- ~~• Practicing and/or instruction of modalities cannot be performed on a client even under supervision of a PAMs certified therapist.~~
- ~~• 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.~~
- ~~• 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 (PAM) certification and may be administratively approved upon submission of application.~~

~~**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.~~

The Committee reviewed Board Policy A1 and made an additional amendment to align the policy with the additional amendments made to the Board Rules. The Policy amendment provides clarification to staff for application processing by detailing which alternative documents will be considered acceptable to obtain in lieu of the verification of employment form. The amendment removes barriers in application processing by eliminating the need for applications to be held for review at a future board meeting whenever an applicant cannot provide a

verification of employment form. The alternative documents help to maintain the appropriate checks and balances as it relates to an applicants practice in the field of occupational therapy. By giving staff guidelines for which documents are acceptable alternatives, the application process becomes more simplified. Staff is able to process the application to completion and when all requirements are met, a license can ultimately be issued between board meetings, thus expanding access to care and services in a more expedient fashion.

The independent support for the amendment comes from stakeholders, and due to the use of the GOALS licensing platform which aligns with national changes in technology. The Committee discussed the economic impact of the amendment and determined it is in the best interest for both applicants and staff by cutting undue red tape while promoting public health, safety, and welfare.

Ms. McDaniel motioned, Dr. Hinerfeld seconded, and the Committee voted in favor of the motion to refer Rule 671-3-.01. Application. Amended, Rule 671-3-.09 Reinstatement of a License, Rule 671-3-.14. Reciprocity, and Board Policy A1 to the full Board including their rationales and recommendations. If no objections, refer to the Attorney General's Office for a Memorandum of Authority.

Adjournment No further business was discussed, and the Committee meeting adjourned at 2:38 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: February 6, 2026

ROBERT McCLELLAN

COMMITTEE CHAIR

ADRIENNE PRICE

EXECUTIVE DIRECTOR

ROBERT McCLELLAN

BOARD CHAIR