

LOUISIANA STATE BOARD OF MEDICAL EXAMINERS

630 Camp Street, New Orleans, LA 70130 Web site: http://www.lsbme.la.gov

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February 14, 2025

Department of Justice Attn: Civil Division- Occupational Licensing Review Program olrp@ag.louisiana.gov

To Whom It May Concern:

Pursuant to La. Rev. Stat. 49:260, please accept this letter as a submission of the Louisiana State Board of Medical Examiner's proposed Occupational Therapists and Occupational Therapy Assistants regulations for review by the Louisiana Department of Justice as part of the Occupational Licensing Review Program.

The Board's authority arises from La. R.S. 49:952 *et seq.* of the Louisiana Administrative Procedure Act and from R.S. 37:1270 of the Louisiana Medical Practice Act. The Board proposes to amend its rules governing Occupational Therapists and Occupational Therapy Assistants. The proposed Rule changes will amend the standards of practice for occupational therapy practitioners, update licensure qualifications, introduce new definitions, revise continuing education requirements, restructure the Occupational Therapist Advisory Committee, establish rules governing the practice of dry needling and the supervision of unlicensed personnel and volunteers, amend the rules concerning the supervision of Occupational Therapy Assistants, and make typographical changes.

To aid your review, the following documents are attached:

- Notice of Intent and full text of the proposed rule published in the December 2024 Louisiana Register, 50 LR1906;
- > Approved fiscal and economic impact statement;
- Underline/strikethrough version of the proposed occupational regulation;
- Completed Rule Submission Form; and
- > Public comments.

Please note that during the public comment period, we received multiple public comments, but no hearing was requested. The Board and the Occupational Therapy Advisory Committee considered the written public comments. After consideration and deliberation, the Board and OTAC decided against making any further substantive changes to the proposed amendments. One small change to address a typographical error was made in the attached proposed amendments - the change of "DrPH" to "DrOT" in 1951(C)(1).

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If you have any questions about the enclosed information or our procedures, please contact me:

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Sincerely,

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Vincent A Culotta Jr, MD

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