

## Snell, Toby (PLA)

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**From:** Danielle Sparks [REDACTED]  
**Sent:** Wednesday, August 6, 2025 9:57 AM  
**To:** Snell, Toby (PLA)  
**Subject:** LSA Document # 25-329 Occupational Therapy Profession Updates

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Hello, I am writing to submit my comment on these proposed changes.

1. I oppose changing the days required for countersignature of OTA documentation. This requirement is problematic for many reasons. Countersignature indicates supervision. OTAs are licensed and if they are to treat a patient following the parameters outlined, there is no reason for an OT to have to countersign progress notes. Documenting case coordination would be much for useful and relevant. If a requirement of so many days is deemed necessary then I do not think that window should be shortened. This entire process is an unnecessary burden to OTs and in most states is not a requirement. Certainly OTAs should have oversight and follow treatment plans that OTs outline, but requiring a blind signature is very problematic.
2. I am not in favor of any free for compact privilege. I have a hard time understanding how that is required at all, let alone \$100. Our fees are going to double?! With so many other issues with therapists being able to make a fair wage (insurance reimbursement cuts, increasing schooling costs and debt, less money for continuing education from employers, salary increases that aren't keeping up with inflation), it does not seem fair or feasible for therapists who really have no interest in compact to have to pay that much more. There are some therapists that may practice in more than one state, but others should incur a large increase in dues for this.

Thank you for allowing and considering comments. These type of licensing amendments should always be shared with stakeholders with a comment period, not just when the state organization sends something to members.

Thank you,  
Danielle Sparks

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