

**Laura M. O'Brien**  
Chairperson

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**WISCONSIN OCCUPATIONAL THERAPISTS  
AFFILIATED CREDENTIALING BOARD**



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March 9, 2021

Senator Stephen Nass, Senate Co-Chairperson  
Joint Committee for Review of Administrative Rules  
Room 10 South, State Capitol  
Madison, WI 53702

Representative Adam Neylon, Assembly Co-Chairperson  
Joint Committee for Review of Administrative Rules  
Room 204 North, State Capitol  
Madison, WI 53702

RE: Report Submitted in Compliance with s. 227.29 (1), Stats.

Dear Senator Nass and Representative Neylon:

This report has been prepared and submitted in compliance with s. 227.29 (1), Stats.

**I. Unauthorized rules, as defined in s. 227.26 (4) (a):**

After careful review of the Board's administrative rules, the Board has determined that no promulgated rules are unauthorized.

**II. Rules for which the authority to promulgate has been restricted:**

After careful review of the Board's administrative rules, the Board has determined that no promulgated rules have restricted authority.

**III. Rules that are obsolete or that have been rendered unnecessary:**

After careful review of the Board's administrative rules, the Board has determined that no promulgated rules are obsolete or have been rendered unnecessary.

**IV. Rules that are duplicative of, superseded by, or in conflict with another rule, a state statute, a federal statute or regulation, or a ruling of a court of competent jurisdiction:**

<b>Rule</b>	<b>Citation or the text of the statute, regulation, or ruling</b>	<b>Action taken to address or reason for not taking an action</b>
OT 2.02 (1) (b)	This section is in conflict with s. 448.963, Stats., which requires initial certification with the National Board for Certification in Occupational Therapy (NBCOT) for licensure. Section OT 2.02 (1) (b) requires current certification with NBCOT for licensure.	A scope statement (SS 001-21) has been published and a preliminary rule draft has been approved by the Board.

**V. Rules that are economically burdensome:**

After careful review of the Board's administrative rules, the Board has determined that no promulgated rules are economically burdensome.

**VI. Status of rules identified in the Board's previous report:**

Rule	Description of the legislation that restricted the Board's authority	Status of action taken to address
OT 3.06 (5)	The Board's authority to request verification of compliance with continuing education requirements has been restricted by 2017 Act 59, s. 1929.	A final draft rule (CR 20-016) has been submitted to the Legislature for approval.

Thank you.

Sincerely,



Laura O'Brien  
Chairperson  
Occupational Therapists Affiliated Credentialing Board