



**VIRTUAL/TELECONFERENCE
OCCUPATIONAL THERAPISTS AFFILIATED CREDENTIALING BOARD**

Virtual, 4822 Madison Yards Way, Madison

Contact: Tom Ryan (608) 266-2112

March 10, 2026

The following agenda describes the issues that the Board plans to consider at the meeting. At the time of the meeting, items may be removed from the agenda. Please consult the meeting minutes for a record of the actions of the Board.

AGENDA

9:00 A.M.

OPEN SESSION – CALL TO ORDER – ROLL CALL

A. Adoption of Agenda (1-3)

B. Approval of Minutes of December 16, 2025 (4-6)

C. Reminders: Conflicts of Interest, Scheduling Concerns

D. Introductions, Announcements and Recognition

1. Introduction and Welcome – DSPPS Secretary Hereth

E. Administrative Matters – Discussion and Consideration (7-31)

1. Department, Staff and Board Updates

2. **2026 Meeting Dates (7)**

3. **Annual Policy Review (8-11)**

4. **Election of Officers, Appointment of Liaisons and Alternates, Delegation of Authorities (12-31)**

5. Board Members – Term Expiration Dates

a. Black, Teresa L. – 7/1/2027

b. Donovan, Amber M. – 7/1/2027

c. Erickson, Terrance C. – 7/1/2027

d. Inda, Kari C. – 7/1/2026

e. Kearns, Christine – 7/1/2027

6. Wis. Stat. s. 15.085(3)(b) – Biannual Meeting with the Medical Examining Board to Consider Matters of Joint Interest – Update

F. Legislative and Policy Matters – Discussion and Consideration

G. Administrative Rule Matters – Discussion and Consideration

1. Pending or Possible Rulemaking Projects

H. Appending the Suffice /L to Credentials in Wisconsin – Board Discussion (32-43)

- I. Wisconsin Occupational Therapy Association – Discussion and Consideration
- J. Occupational Therapy (OT) Licensing Compact Report – Discussion and Consideration
- K. Discussion and Consideration of Items Added After Preparation of Agenda:
 - 1. Introductions, Announcements and Recognition
 - 2. Administrative Matters
 - 3. Election of Officers
 - 4. Appointment of Liaisons and Alternates
 - 5. Delegation of Authorities
 - 6. Education and Examination Matters
 - 7. Credentialing Matters
 - 8. Practice Matters
 - 9. Legislative and Policy Matters
 - 10. Public Health Emergencies
 - 11. Administrative Rule Matters
 - 12. Liaison Reports
 - 13. Board Liaison Training and Appointment of Mentors
 - 14. Informational Items
 - 15. Division of Legal Services and Compliance (DLSC) Matters
 - 16. Presentations of Petitions for Summary Suspension
 - 17. Petitions for Designation of Hearing Examiner
 - 18. Presentation of Stipulations, Final Decisions and Orders
 - 19. Presentation of Proposed Final Decisions and Orders
 - 20. Presentation of Interim Orders
 - 21. Petitions for Re-Hearing
 - 22. Petitions for Assessments
 - 23. Petitions to Vacate Orders
 - 24. Requests for Disciplinary Proceeding Presentations
 - 25. Motions
 - 26. Petitions
 - 27. Appearances from Requests Received or Renewed
 - 28. Speaking Engagements, Travel, or Public Relation Requests, and Reports

L. Public Comments

CONVENE TO CLOSED SESSION to deliberate on cases following hearing (s. 19.85(1)(a), Stats.); to consider licensure or certification of individuals (s. 19.85(1)(b), Stats.); to consider closing disciplinary investigations with administrative warnings (ss. 19.85(1)(b), and 440.205, Stats.); to consider individual histories or disciplinary data (s. 19.85(1)(f), Stats.); and to confer with legal counsel (s. 19.85(1)(g), Stats.).

- M. Deliberation of Items Added After Preparation of the Agenda
 - 1. Education and Examination Matters
 - 2. Credentialing Matters
 - 3. DLSC Matters
 - 4. Monitoring Matters
 - 5. Professional Assistance Procedure (PAP) Matters
 - 6. Petitions for Summary Suspensions
 - 7. Petitions for Designation of Hearing Examiner
 - 8. Proposed Stipulations, Final Decisions and Order
 - 9. Proposed Interim Orders

10. Administrative Warnings
11. Review of Administrative Warnings
12. Proposed Final Decisions and Orders
13. Matters Relating to Costs/Orders Fixing Costs
14. Case Closings
15. Board Liaison Training
16. Petitions for Assessments and Evaluations
17. Petitions to Vacate Orders
18. Remedial Education Cases
19. Motions
20. Petitions for Re-Hearing
21. Appearances from Requests Received or Renewed

N. Consulting with Legal Counsel

RECONVENE TO OPEN SESSION IMMEDIATELY FOLLOWING CLOSED SESSION

- O. Vote on Items Considered or Deliberated Upon in Closed Session if Voting is Appropriate
- P. Open Session Items Noticed Above Not Completed in the Initial Open Session
- Q. Delegation of Ratification of Examination Results and Ratification of Licenses and Certificates

ADJOURNMENT

NEXT MEETING: JUNE 9, 2026

ORAL INTERVIEW OF CANDIDATES FOR LICENSURE

VIRTUAL/TELECONFERENCE

10:30 A.M. OR IMMEDIATELY FOLLOWING FULL BOARD MEETING

CLOSED SESSION – Reviewing Applications and Conducting Oral Interviews of **Zero (0)** (at the time of agenda publication) Candidates for Licensure and Any Additional Examinations
 Added After Agenda Preparation – Teresa Black

MEETINGS AND HEARINGS ARE OPEN TO THE PUBLIC, AND MAY BE CANCELLED WITHOUT NOTICE

Times listed for meeting items are approximate and depend on the length of discussion and voting. All meetings are held virtually unless otherwise indicated. In-person meetings are typically conducted at 4822 Madison Yards Way, Madison, Wisconsin, unless an alternative location is listed on the meeting notice. In order to confirm a meeting or to request a complete copy of the board’s agenda, please visit the Department website at <https://dps.wi.gov>. The board may also consider materials or items filed after the transmission of this notice. Times listed for the commencement of any agenda item may be changed by the board for the convenience of the parties. The person credentialed by the board has the right to demand that meeting at which final action may be taken against the credential be held in open session. Requests for interpreters for the hard of hearing, or other accommodations, are considered upon request by contacting the Affirmative Action Officer or reach the Meeting Staff by calling 608-267-7213.

**VIRTUAL/TELECONFERENCE
OCCUPATIONAL THERAPISTS AFFILIATED CREDENTIALING BOARD
MEETING MINUTES
DECEMBER 16, 2025**

PRESENT: Teresa Black, Amber Donovan, Terrance Erickson (*arrived at 9:45 a.m.*), Kari Inda, Christine Kearns

STAFF: Tom Ryan, Executive Director; Jameson Whitney, Legal Counsel; Nilajah Hardin, Administrative Rules Coordinator; Ashley Sarnosky, Board Administration Specialist; and other Department staff

CALL TO ORDER

Teresa Black, Chairperson, called the meeting to order at 9:43 a.m. A quorum was confirmed with four (4) board members present.

ADOPTION OF AGENDA

Amendments to the Agenda

- *Remove item M.1 from the agenda*

MOTION: Kari Inda moved, seconded by Amber Donovan, to adopt the Agenda as amended. Motion carried unanimously.

Terrance Erickson arrived at 9:45 a.m.

APPROVAL OF MINUTES OF SEPTEMBER 16, 2025

MOTION: Christine Kearns moved, seconded by Amber Donovan, to approve the Minutes of September 16, 2025, as published. Motion carried unanimously.

INTRODUCTIONS, ANNOUNCEMENTS, AND RECOGNITION

Recognition: Randi Hanson, Occupational Therapist Member (Resigned: 6/2025)

MOTION: Terrance Erickson moved, seconded by Christine Kearns, to recognize and thank Randi Hanson for their years of dedicated service to the Board and State of Wisconsin. Motion carried unanimously.

CLOSED SESSION

MOTION: Terrance Erickson moved, seconded by Christine Kearns, to convene to Closed Session to deliberate on cases following hearing (§ 19.85(1)(a), Stats.); to consider licensure or certification of individuals (§ 19.85(1)(b), Stats.); to consider closing disciplinary investigations with administrative warnings (§ 19.85(1)(b), Stats. and § 448.02(8), Stats.); to consider individual histories or disciplinary data (§ 19.85(1)(f), Stats.); and to confer with legal counsel (§ 19.85(1)(g), Stats.). Teresa Black, Chairperson, read the language of the motion aloud for the record. The vote of each member was ascertained by voice vote. Roll Call Vote: Teresa Black-yes; Amber Donovan-yes; Terrance Erickson-yes; Kari Inda-yes; Christine Kearns-yes. Motion carried unanimously.

The Board convened into Closed Session at 10:17 a.m.

DELIBERATION ON DIVISION OF LEGAL SERVICES AND COMPLIANCE (DLSC) MATTERS

Proposed Stipulations, Final Decisions and Order

25 OTB 0003 – Lyndsay M. Kopping

MOTION: Terrance Erickson moved, seconded by Amber Donovan, to adopt the Findings of Fact, Conclusions of Law and Order in the matter of proceedings against Lyndsay M. Kopping, DLSC Case Number 25 OTB 0003. Motion carried unanimously.

Case Closings

25 OTB 0005 – L.L.S.

MOTION: Terrance Erickson moved, seconded by Christine Kearns, to close DLSC Case Number 25 OTB 0005, against L.L.S., for Prosecutorial Discretion (P7). Motion carried unanimously.

25 OTB 0008 – M.L.M.

MOTION: Kari Inda moved, seconded by Terrance Erickson, to close DLSC Case Number 25 OTB 0008, against M.L.M., for No Violation. Motion carried unanimously.

RECONVENE TO OPEN SESSION

MOTION: Terrance Erickson moved, seconded by Kari Inda, to reconvene in Open Session. Motion carried unanimously.

The Board reconvened to Open Session at 10:31 a.m.

VOTE ON ITEMS CONSIDERED OR DELIBERATED UPON IN CLOSED SESSION, IF VOTING IS APPROPRIATE

MOTION: Terrance Erickson moved, seconded by Amber Donovan, to affirm all motions made and votes taken in Closed Session. Motion carried unanimously.

(Be advised that any recusals or abstentions reflected in the closed session motions stand for the purposes of the affirmation vote.)

DELEGATION OF RATIFICATION OF LICENSES AND CERTIFICATES

MOTION: Terrance Erickson moved, seconded by Kari Inda, to delegate ratification of examination results to DSPS staff and to ratify all licenses and certificates as issued. Motion carried unanimously.

ADJOURNMENT

MOTION: Amber Donovan moved, seconded by Christine Kearns, to adjourn the meeting.
Motion carried unanimously.

The meeting adjourned at 10:35 a.m.

**OCCUPATIONAL THERAPISTS AFFILIATED CREDENTIALING BOARD
2026 MEETING DATES**

Meeting Date	Start time	Location	Agenda Item Deadline
Tuesday, March 10, 2026	9:00 AM	Virtual	2/26/2026
Tuesday, June 9, 2026	9:30 AM	Virtual	5/28/2026
Tuesday, September 15, 2026	9:30 AM	Virtual	9/3/2026
Tuesday, December 15, 2026	9:30 AM	Virtual	12/3/2026

**State of Wisconsin
Department of Safety & Professional Services**

AGENDA REQUEST FORM

- 1) Name and title of person submitting the request: Audra Cohen-Plata, DPD Division Administrator
 - 2) Date When Request Submitted: 12/11/2025
 - 3) Name of Board, Committee, Council, Section: **All Boards**
 - 4) Meeting Date: **First Meeting of 2026**
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- 5) Attachments: **Yes**
 - 6) How should the item be titled on the agenda page? **Administrative Matters: Annual Policy Review**
 - 7) Place Item in: **Open Session**
 - 8) Is an appearance before the Board being scheduled? No
 - 9) Name of Case Advisor(s), if applicable: N/A
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10) Describe the issue and action that should be addressed:

Please be advised of the following policy item attachments:

- 1) 2026 Annual Policy Review Memo
- 2) Timeline of a Meeting
- 3) Sample Per Diem Report



DATE: January 1, 2026
TO: DSPS Board, Council, and Committee Members
FROM: Division of Policy Development
SUBJECT: 2026 Administrative Policy Reminders

Please be advised of the following policy items:

1. In-Person and Virtual Meetings: Depending on the frequency of scheduled meetings, discussion topics, and member availability, DSPS may host one or more in-person meetings. Virtual connection options are available for all board meetings. If you are traveling internationally, please see item 9 below.
2. Attendance/Quorum: Thank you for your service and commitment to meeting attendance. If you cannot attend a meeting or have scheduling conflicts impacting your attendance, please let us know as soon as possible. A quorum is required for Boards, Sections, and Councils to meet pursuant to Open Meetings Law. Connect to / arrive at meetings 10 minutes before posted start time to allow for audio/connection testing, and timely Call to Order and Roll Call. Virtual meetings include viewable onscreen materials and A/V (speaker/microphone/video) connections.
3. Walking Quorum: Board/Section/Council members must not collectively discuss the body's business outside a properly noticed meeting. If several members of a body do so, they could be violating the open meetings law.
4. Mandatory Training: All Board Members must complete Public Records and Ethics Training, annually. [Register to set up an account](#) in the Cornerstone LearnCenter online portal or [Log in](#) to an existing account.
5. Agenda Deadlines: Please communicate agenda topics to your Executive Director before the agenda submission deadline at 12:00 p.m., eight business days before a meeting. (Attachment: Timeline of a Meeting)
6. Travel Voucher and Per Diem Submissions: Please submit all Per Diem and Reimbursement claims to DSPS within 30 days of the close of each month in which expenses are incurred. (Attachment: Per Diem Form) Travel Vouchers are distributed on travel approval.
7. Lodging Accommodations/Hotel Cancellation Policy: Lodging accommodations are available to eligible members for in-person meetings. Standard eligibility: the member must leave home before 6:00 a.m. to attend an in-person meeting by the scheduled start time.
 - a. If a member cannot attend a meeting, they must cancel their reservation with the hotel within the applicable cancellation timeframe.
 - b. If a meeting is changed to occur remotely, is canceled, or rescheduled, DSPS staff will cancel or modify reservations as appropriate.
8. Inclement Weather Policy: In inclement weather, the DSPS may change a meeting from an in-person venue to a virtual/teleconference only.
9. International Travel: Use of State-managed IT resources and access of State data outside the United States are strictly prohibited, as they cause an unacceptable level of cybersecurity risk. This prohibition includes all State-provided or State-managed IT resources housed on personal devices. Please advise your Executive Director of any planned international travel commitments that may coincide with board meetings or other board business in advance of your departure.

Timeline of a Meeting

At least 2 weeks (10 business days) prior to the meeting

Submit Agenda Item suggestions to the Board's Executive Director. Include background materials. Copyright-protected materials must be accompanied by written permission from the publisher to share documents.

8 business days prior to the meeting

The Agenda is drafted. (All agenda materials are due to the Department by 12:00 p.m.)

7 business days prior to the meeting

The draft agenda is submitted to the Executive Director; the Executive Director transmits it to the Chair for review and approval.

5 business days prior to the meeting

The approved agenda is returned to the Board Administration Specialist (BA) for agenda packet production and compilation.

4 business days prior to the meeting

Agenda packets are posted on the DSPS Board SharePoint site and on the Board webpage.

Agenda Item Examples:

- Open Session Items
 - Public Hearings and Administrative Rules Matters
 - Administrative Matters
 - Legislation and Policy Matters
 - Credentialing Matters
 - Education and Exam Issues
 - Public Agenda Requests
 - Current Issues Affecting the Profession
- Closed Session items
 - Deliberations on Proposed Disciplinary Actions
 - Monitoring Matters
 - Professional Assistance Procedure (PAP) Issues
 - Proposed Final Decisions and Orders
 - Orders Fixing Costs/Matters Relating to Costs
 - Credentialing Matters
 - Education and Exam Issues

Thursday of the Week Prior to the Meeting

Agendas are published for public notice on the Wisconsin Public Notices and Meeting Minutes website: publicmeetings.wi.gov.

1 business day after the Meeting

"Action" lists are distributed to Department staff detailing board actions on closed session business.

5 business days after the Meeting

"To Do" lists are distributed to staff to ensure that board open session decisions are acted on and/or implemented within the appropriate divisions in the Department. Minutes approved by the board are published on the Wisconsin Public Notices and Meeting Minutes website: publicmeetings.wi.gov.

OCCUPATIONAL THERAPISTS AFFILIATED CREDENTIALING BOARD
Elections and Liaisons

Election of Officers

2025 ELECTION RESULTS	
Chairperson	Teresa Black
Vice Chairperson	Kari Inda
Secretary	Christine Kearns

Appointment of Liaisons and Alternates

LIAISON APPOINTMENTS	
Credentialing Liaison(s)	Christine Kearns, Amber Donovan <i>Alternate:</i> Randi Hanson, Teresa Black
Education and Examinations Liaison(s)	Teresa Black, Kari Inda <i>Alternate:</i> Randi Hanson
Monitoring Liaison(s)	Randi Hanson <i>Alternate:</i> Christine Kearns, Kari Inda
Professional Assistance Procedure Liaison(s)	Randi Hanson <i>Alternate:</i> Kari Inda, Christine Kearns
Legislative Liaison(s)	Teresa Black <i>Alternate:</i> Terrance Erickson
Travel Authorization Liaison(s)	Teresa Black <i>Alternate:</i> Terrance Erickson
Website Liaison(s)	Randi Hanson <i>Alternate:</i> Terrance Erickson
Compact Liaison(s)	Teresa Black <i>Alternate:</i> Amber Donovan

Screening Panel	Kari Inda, Christine Kearns <i>Alternate:</i> Teresa Black, Randi Hanson
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**State of Wisconsin
Department of Safety & Professional Services**

AGENDA REQUEST FORM

1) Name and title of person submitting the request: Paralegal Richanda Turner, on behalf of Attorney Jameson Whitney		2) Date when request submitted: 02/20/26 Items will be considered late if submitted after 12:00 p.m. on the deadline date which is 8 business days before the meeting	
3) Name of Board, Committee, Council, Sections: Occupational Therapists Affiliated Credentialing Board			
4) Meeting Date: 03/10/26	5) Attachments: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	6) How should the item be titled on the agenda page? Reaffirming 2025 delegations and new 2026 delegations	
7) Place Item in: <input checked="" type="checkbox"/> Open Session <input type="checkbox"/> Closed Session	8) Is an appearance before the Board being scheduled? <i>(If yes, please complete Appearance Request for Non-DSPS Staff)</i> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	9) Name of Case Advisor(s), if applicable: N/A	
10) Describe the issue and action that should be addressed: The Board members need to review and consider reaffirming 2025 delegations and new delegations for 2026.			
11) Authorization			
<i>Richanda Turner</i>		02/20/26	
Signature of person making this request		Date	
Supervisor (Only required for post agenda deadline items)		Date	
Executive Director signature (Indicates approval for post agenda deadline items)		Date	
Directions for including supporting documents: 1. This form should be saved with any other documents submitted to the Agenda Items folders. 2. Post Agenda Deadline items must be authorized by a Supervisor and the Policy Development Executive Director. 3. If necessary, provide original documents needing Board Chairperson signature to the Bureau Assistant prior to the start of a meeting.			



State of Wisconsin
DEPARTMENT OF SAFETY AND PROFESSIONAL SERVICES
CORRESPONDENCE / MEMORANDUM

DATE: January 1, 2026

TO: Board, Council, and Committee Members

FROM: Legal Counsel

SUBJECT: Liaison Definitions and Delegations Explanations

Executive Summary

This memorandum provides an overview of the liaison roles and common delegation authorities that enable DSPS Boards, Sections, and Committees to efficiently fulfill their statutory responsibilities. It explains the function of each liaison position, such as, Credentialing, Monitoring, PAP, Education and Examination, Legislative, Travel Authorization, and Communication Liaisons, as well as Screening Panel Members, and outlines how these roles support Board operations between meetings. This memorandum also includes model motions for liaisons, Department staff, and Department attorneys to ensure timely processing of credential applications, monitoring requests, disciplinary matters, and administrative tasks. The delegations promote consistency, reduce delays, and allow the Department and Boards to respond promptly to legal and operational needs while maintaining their responsibility to protect public health, safety, and welfare.

Overall Purpose of Liaison Appointments

Each Board/Section (Board) has inherent authority that is established in our Wisconsin Statutes. This authority may change from Board to Board. Further information on your Board's authority can be found in Wis. Stat. ch. 15. Generally, each Board has authority to grant credentials, discipline credential holders, and set standards for education and examinations and unprofessional conduct. In order to efficiently accomplish these tasks, Boards may appoint Liaisons. Liaisons assist with the operations of the Boards' purpose by weighing in on legislative matters, traveling to national conferences, or communicating with stakeholders.

At the first Board meeting of each year, the Department asks the Boards to make Liaison appointments. Your practical knowledge and experience as an appointed member of a professional board are essential in making determinations regularly. The Liaison positions listed below assist

the Department to complete operations between Board meetings. In most cases, Liaisons can make decisions for the full Board in their designated area. However, these areas are determined through the delegation process. Please note a Liaison may also decide to send the delegated matter to the full Board for consideration as appropriate. Delegations assist the Board in defining the roles and authorities of each Liaison and other Board functions.

Liaison Definitions

Credentialing Liaison: The Credentialing Liaison is empowered by the Board to review and make determinations regarding certain credential applications. The Credentialing Liaison may be called on by Department staff to answer questions that pertain to qualifications for licensure, which may include whether a particular degree is suitable for the application requirements, whether an applicant's specific work experience satisfies the requirements in statute or rule for licensure, or whether an applicant's criminal or disciplinary history is substantially related to the practice of the profession in such a way that granting the applicant a credential would create a risk of harm to the public. The Credentialing Liaison serves a very important role in the credentialing process. If the Credentialing Liaison has a question on a request, it is advisable for the Liaison to consult further with Department staff or bring the matter to the full Board for consideration.

Monitoring Liaison: The Monitoring Liaison is empowered by the Board to make decisions on any credential that is subject to Monitoring either through a disciplinary order or initial licensure. The Department Monitors will send requests from credential holders to the Monitoring Liaison. A common request could be to remove a limitation that has been placed on a credential or to petition for full licensure. The Monitoring Liaison can review these requests and make decisions on behalf of the Board. If the Monitoring Liaison has a question on a request, it is advisable for the Liaison to consult further with Department staff or bring the matter to the full Board for consideration.

Professional Assistance Procedure (PAP) Liaison: PAP is a voluntary program open to credential holders with substance abuse issues who wish to seek help by being held accountable through treatment and monitoring by the Department and Board. As part of PAP, the credential holder enters into an agreement with the Department to undergo testing, counseling, or other rehabilitation. The PAP Liaison's role includes responding to credential holders' requests for modifications and terminations of provisions of the agreement. Similar to the Monitoring Liaison, the Department Monitors will send requests from credential holders to the PAP Liaison for further review.

Education and Examination Liaison: Some Boards are required by statute or rule to approve qualifying education and examinations. The Education and Examination Liaison provides guidance to Department staff to exercise authority of the Board to approve or decline examinations and educational programs and related requests. This determination requires a level of professional expertise and should be performed by a professional member of the Board. For some Boards, the Education and Examination Liaison will also be tasked with approving continuing education programs and courses.

Legislative Liaison: The Legislative Liaison is not the Board's designated lobbyist and should exercise their delegated authority carefully. The Legislative Liaison is permitted to act and speak

on the Board's behalf regarding pending and enacted legislation or actions being considered by the legislature outside of Board meetings. Please review Wis. Stat. ch. 13 for important reminders on lobbying.

Travel Authorization Liaison: The Travel Authorization Liaison is authorized to approve a Board member to travel to events and speak or act on the Board's behalf between Board meetings. The Travel Authorization Liaison is called upon to make decisions when sufficient notice was not received, and the full Board could not determine a representative to travel. The Travel Authorization Liaison is tasked with making determinations if the Board appointed representative is not able to attend or if the Board becomes authorized to send additional members as scholarship and funding streams can be unpredictable.

Communication Liaison: The Communication Liaison responds to questions that arise on behalf of the Board. The Communication Liaison works with the Department to cultivate an appropriate response which will be sent by the Executive Director or Board Counsel. The Communication Liaison **can** be responsible for all types of communication on behalf of the Board. However, the Board can appoint a separate **Website Liaison** to work with DSPP staff to make changes and ensure the Board webpage contains updated and accurate information. Additionally, for the Boards that are required by statute to produce a newsletter or digest, the Board can appoint a separate **Newsletter/Digest Liaison** to assemble and approve content for those communications.

Screening Panel Members: Screening Panel Members review incoming complaints against credential holders and determine which complaints should be opened for investigation and which complaints should be closed without further action. The complexity and amount of work in this role depends substantially on your Board. As a member of the Screening Panel, you are asked to apply your professional expertise to determine if a complaint alleges unprofessional conduct.

Delegations Explanations

CREDENTIALING DELEGATIONS

The overall purpose of credentialing delegations is to allow the credentialing process to proceed as efficiently and effectively as possible.

Delegation of Authority to Credentialing Liaison (Generic)

MOTION EXAMPLE: to delegate authority to the Credentialing Liaison(s) to serve as a liaison between the Department and the Board and to act on behalf of the Board in regard to credentialing applications or questions presented to them, including the signing of documents related to applications.

PURPOSE: To allow a representative of the Board to assist Department staff with credentialing applications and eliminate the need for the entire Board to convene to consider credential application content or questions. Additionally, it is most efficient to have the designated liaison

who has assisted with the credentialing process be able to effectuate decisions which require a signature.

Delegation of Authority to DSPS When Credentialing Criteria is Met

MOTION EXAMPLE: to delegate credentialing authority to the Department to act upon applications that meet all credentialing statutory and regulatory requirements without Board or Board liaison review.

PURPOSE: To permit Department staff to efficiently issue credentials and eliminate the need for Board/Section/Liaison review when all credentialing legal requirements are met in an application. This delegation greatly decreases the workload of Board members and cuts down processing time on applications.

Delegation of Authority for Predetermination Reviews

MOTION EXAMPLE: to delegate authority to the Department attorneys to make decisions regarding predetermination applications pursuant to Wis. Stat. § 111.335(4)(f).

PURPOSE: In general, the Wisconsin Fair Employment Act (codified in Wis. Stat. Ch. 111) prohibits licensing agencies from discriminating against applicants because of their arrest and/or conviction record. However, there are exceptions which permit denial of a license in certain circumstances. Individuals who do not possess a license have a legal right to apply for a determination of whether they are disqualified from obtaining a license due to their conviction record. This process is called “Predetermination.” Predetermination reviews must be completed within 30 days. This delegation allows Department attorneys to conduct predetermination reviews and efficiently make these legal determinations without need for Board/Section/Liaison review.

Delegation of Authority for Conviction Reviews

MOTION EXAMPLE: to delegate authority to the Department attorneys to review and approve applications with convictions which are not substantially related to the relevant professional practice.

PURPOSE: As used here, “substantially related” is a legal standard that is used in the Wisconsin Fair Employment Act. The concept of what is “substantially related” is informed by case law. This delegation permits Department attorneys to independently conduct conviction reviews and efficiently approve applications if convictions are not substantially related to the practice of the profession. Applications that contain conviction records that may be substantially related to the practice of a profession will still be submitted to the Credentialing Liaison for input.

Delegation to DSPS When Applicant’s Disciplinary History Has Been Previously Reviewed

MOTION EXAMPLE: to delegate authority to Department staff to approve applications where Applicant’s prior discipline has been approved for a previous credential and there is no new discipline.

PURPOSE: Some Boards offer progressive levels of credentials. This delegation eliminates the need for a re-review of discipline that has already been considered and approved by the Board/Section/Liaison for a lower-level credential.

Delegation to DSPS When Applicant’s Conviction History Has Been Previously Reviewed

MOTION EXAMPLE: to delegate authority to Department staff to approve applications where criminal background checks have been approved for a previous credential and there is no new conviction record.

PURPOSE: Some Boards offer progressive levels of credentials. This delegation eliminates the need for a re-review of conviction history that has already been reviewed and approved for a lower-level credential.

Delegation of Authority for Reciprocity Reviews

MOTION EXAMPLE: to delegate authority to the Department attorneys to review and approve reciprocity applications in which the out-of-state license requirements meet Wisconsin license requirements. (Specific legal standards are referenced in the motion depending on credential/profession type.)

PURPOSE: Applications via reciprocity or endorsement require comparison of Wisconsin licensing requirements to the licensing requirements of another jurisdiction. These reviews consider the legal standard for reciprocity, which varies by profession, as well as the specified legal requirements to obtain licensure in the profession. This delegation permits Department attorneys to independently conduct reciprocity reviews and efficiently approve applications if legal standards and requirements are met for licensure. Applications for which reciprocity may not be available will still be submitted to the Credentialing Liaison for input.

Delegation of Authority for Military Reciprocity Reviews

MOTION EXAMPLE: to delegate authority to the Department attorneys to review and approve military reciprocity applications in which the individual meets the requirements of Wis. Stat. § 440.09.

PURPOSE: The law permits service members, former service members, and their spouses to be licensed if they hold licensure in other jurisdictions that qualify them to perform acts authorized by the credential they are seeking in Wisconsin. This is a shortened path to licensure that does not require meeting the specific requirements/standards for licensure/reciprocity in a profession. By law, the Department/Board must expedite the issuance of a reciprocal license via military

reciprocity. This delegation permits Department attorneys to independently conduct military reciprocity reviews and efficiently approve applications if legal standards and requirements are met for licensure. Applications for which reciprocity may not be available will still be submitted to the Credentialing Liaison for input.

Delegation of Authority for Application Denial Reviews

MOTION EXAMPLE: to delegate authority to the Department's attorney supervisors to serve as the Board designee for purposes of reviewing and acting on requests for hearing as a result of a denial of a credential.

PURPOSE: When an application is denied, the applicant has a legal right to appeal the denial determination. Applicants must meet a specified legal standard in order to have an appeal granted. Additionally, Wisconsin law sets specific time frames for appeal decisions. This delegation permits Department attorney supervisors to independently review and efficiently act on requests for hearing as a result of a denial of a credential.

Delegation to Department Attorneys to Approve Duplicate Legal Issue

MOTION EXAMPLE: to delegate authority to Department attorneys to approve a legal matter in connection with a renewal application when that same/similar matter was already addressed by the Board and there are no new legal issues for that credential holder.

PURPOSE: The intent of this delegation is to be able to approve prior discipline by the Board for the renewal applicant. This delegation eliminates the need for a re-review of discipline that has already been considered and approved by the Board/Section/Liaison.

Delegation to Department Attorneys to Approve Prior Discipline

MOTION EXAMPLE: to delegate authority to Department attorneys to approve an applicant's prior professional discipline which resulted in a forfeiture/fine/other monetary penalty, remedial education, and/or reprimand, that is 10 years old or older, and the previously disciplined credential is currently in good standing.

PURPOSE: In order to continue improving processing application legal reviews in a timely matter, this delegation gives Department attorneys authority to approve prior professional discipline which meets all of the following criteria: (1) it is at least ten years old; (2) it resulted in a monetary penalty, remedial education, and/or reprimand; and (3) the previously disciplined credential is currently in good standing.

MONITORING DELEGATIONS

The overall purpose of monitoring delegations is to be able to enforce the Boards orders and limited licenses as efficiently and effectively as possible. Monitoring delegations have two categories: delegations to the Monitoring Liaison and delegations to the Department Monitor.

Delegation of Authority to Department Monitor

MOTION EXAMPLE: to delegate authority to the Department Monitor:

- a. to grant full reinstatement of licensure if education is the only limitation and credential holder has submitted the required proof of course completion.
- b. to suspend the credential if the credential holder has not completed Board ordered education, paid costs, paid forfeitures, within the time specified by the Board Order.
- c. to lift a suspension when compliance with education and costs provisions have been met.

PURPOSE: These delegations allow for the Department Monitor to automatically act on requests when certain criteria are met or not met without needing to burden the Monitoring Liaison. The Board can set their own criteria for what actions they would like to be handled by the Department, the Monitoring Liaison, and the full Board.

Delegation of Authority to Monitoring Liaison

MOTION EXAMPLE: to delegate authority to the Monitoring Liaison to approve or deny all requests received from the credential holder.

PURPOSE: These delegations allow the Board to set criteria for what decisions can be made by the Board member(s) serving as the Monitoring Liaison and what matters should be decided by the full Board.

Education and Examination Delegations

MOTION EXAMPLE: to delegate authority to the Education and Examination Liaison(s) to address all issues related to qualifying education, continuing education and examinations. Motion carried unanimously. (Differs by Board.)

PURPOSE: Some Boards are responsible for approving qualifying educational programs or continuing education courses. A delegation is executed in order for an Education and Examination Liaison to make these determinations on behalf of the Board and with assistance of the Department. Additionally, some Boards review examinations and individual scores to qualify for a credential.

MISCELLANEOUS DELEGATIONS

Document Signature

MOTION EXAMPLE: to delegate authority to the Chairperson (or in absence of the Chairperson, the highest-ranking officer or longest serving board member in that succession) to sign documents on behalf of the Board in order to carry out its duties. Motion carried unanimously.

MOTION EXAMPLE: in order to carry out duties of the Board, the Chairperson (or in absence of the Chairperson, the highest-ranking officer or longest serving board member in that succession) has the ability to delegate signature authority for purposes of facilitating the completion of assignments during or between meetings. The members of the Board hereby delegate to the

Executive Director, Board Counsel, or DPD Division Administrator, the authority to sign on behalf of a Board member as necessary. Motion carried unanimously.

PURPOSE: To take the action approved at Board meetings, the Department may need to draft correspondence and/or Orders after the meetings have adjourned. These actions then need to be signed by a Board Member. This interaction usually takes place over email and a Board member can authorize the use of their signature that is kept on file.

Urgent Matters

MOTION EXAMPLE: in order to facilitate the completion of urgent matters between meetings, the Board delegates its authority to the Chairperson (or, in the absence of the Chairperson, the highest-ranking officer or longest serving Board member in that succession), to appoint liaisons to the Department to act in urgent matters. Motion carried unanimously.

PURPOSE: Allows for quick responses to urgent matters that may need Board approval or for which the Department requires guidance from the Board.

Delegation to Chief Legal Counsel-Due to Loss of Quorum

MOTION EXAMPLE: to delegate the review and authority to act on disciplinary cases to the Department's Chief Legal Counsel due to lack of/loss of quorum after two consecutive meetings. Motion carried unanimously.

PURPOSE: Sometimes Boards can struggle to meet quorum necessary to conduct business. This happens for a multitude of reasons, but this delegation allows for the Boards to have disciplinary cases decided by Chief Legal Counsel if the Board fails to meet quorum for two consecutive meetings.

Delegation to Chief Legal Counsel-Stipulated Resolutions

MOTION EXAMPLE: to delegate to the Department's Chief Legal Counsel the authority to act on behalf of the Board concerning stipulated resolutions providing for a surrender, suspension, or revocation of a credential, where the underlying merits involve serious and dangerous behavior, and where the signed stipulation is received between Board meetings. The Board further requests that Chief Legal Counsel only act on such matters when the best interests of the Board, Department, and the Public are best served by acting upon the stipulated resolution at the time the signed stipulation is received versus waiting for the next Board meeting. Motion carried unanimously.

PURPOSE: For matters of public safety, it may be necessary to take immediate action on a stipulated agreement rather than allowing a credential holder to continue practicing unencumbered until the next scheduled meeting. This delegation allows Chief Legal Counsel to act on behalf of the Board when there is a stipulated agreement. A stipulated agreement is an agreement to which all relevant parties have consented to the terms.

Voluntary Surrenders

MOTION EXAMPLE: to delegate authority to the assigned case advisor to accept or refuse a request for voluntary surrender pursuant to Wis. Stat. § 440.19 for a credential holder who has a pending complaint or disciplinary matter.

MOTION EXAMPLE: to delegate authority to the Department to accept the voluntary surrender of a credential when there is no pending complaint or disciplinary matter with the Department pursuant to Wis. Stat. § 440.19.

PURPOSE: Credential holders can ask the Boards to accept surrender of their credentials at any time. These delegations are in place for the different situations that arise from those requests. If a credential holder is seeking to surrender their credential because they wish to leave the profession, that can be processed with this delegation by the Department if they have no pending disciplinary complaints. If the credential holder wishes to surrender while they have a pending disciplinary complaint, that request is reviewed by the individual Board member assigned to the case.

DLSC Pre-screening

MOTION EXAMPLE: to delegate pre-screening decision making authority to the DSPS screening attorney for opening cases where the credential holder has failed to respond to allegations contained in the complaint when requested by intake (case will be opened on failure to respond and the merits of the complaint).

PURPOSE: Pre-screening delegations exist so the Board can define specific parameters where the Department can review disciplinary complaints and open those cases if they meet certain criteria. Boards also have the authority to set certain criteria that would allow the Department to review and close a case if the criteria is met.

Delegation to Handle Administrative Rule Matters

MOTION EXAMPLE: to delegate authority to the Chairperson (or, in the absence of the Chairperson, the highest-ranking officer or longest serving Board member in that succession), to act on behalf of the Board regarding administrative rule matters between meetings. Motion carried unanimously.

PURPOSE: In order to advance the administrative rules process, action may need to occur between meetings. This allows for quick responses to urgent matters that may need Board approval or for which the Department requires guidance from the Board.

OCCUPATIONAL THERAPISTS AFFILIATED CREDENTIALING BOARD
2025 DELEGATIONS
March 11, 2025

New Delegations for 2025

Delegation to Department Attorneys to Approve Prior Discipline

MOTION: Terrance Erickson moved, seconded by Randi Hanson, to delegate authority to Department Attorneys to approve an applicant's prior professional discipline which resulted in a forfeiture/fine/other monetary penalty, remedial education, and/or reprimand, that is 10 years old or older, and the previously disciplined credential is currently in good standing. Motion carried unanimously.

Delegation to Handle Administrative Rule Matters

MOTION: Terrance Erickson moved, seconded by Christine Kearns, to delegate authority to the Chairperson (or, in the absence of the Chairperson, the highest-ranking officer or longest serving Board member in that succession), to act on behalf of the Board regarding administrative rule matters between meetings. Motion carried unanimously.

Review and Approval of 2024 Delegations including new modifications

MOTION: Christine Kearns moved, seconded by Randi Hanson, to reaffirm all delegation motions made in 2024, as reflected in the March 11, 2025, agenda materials, which were not otherwise modified or amended during the March 11, 2025, meeting. Motion carried unanimously.

All Combined Delegations for 2025

Review and Approval of 2024 Delegations including new modifications

MOTION: Christine Kearns moved, seconded by Randi Hanson, to reaffirm all delegation motions made in 2024, as reflected in the March 11, 2025, agenda materials, which were not otherwise modified or amended during the March 11, 2025, meeting. Motion carried unanimously.

Document Signature Delegations

MOTION: Randi Hanson moved, seconded by Teresa Black, to delegate authority to the Chairperson (or in absence of the Chairperson, the highest-ranking officer or longest serving board member in that succession) to sign documents on behalf of the Board in order to carry out its duties. Motion carried unanimously.

MOTION: Kari Inda moved, seconded by Randi Hanson, in order to carry out duties of the Board, the Chairperson (or in absence of the Chairperson, the highest-ranking officer or longest serving board member in that

succession) has the ability to delegate signature authority for purposes of facilitating the completion of assignments during or between meetings. The members of the Board hereby delegate to the Executive Director, Board Counsel or DPD Division Administrator, the authority to sign on behalf of a board member as necessary. Motion carried unanimously.

Delegated Authority for Urgent Matters

MOTION: Randi Hanson moved, seconded by Teresa Black, that in order to facilitate the completion of urgent matters between meetings, the Board delegates its authority to the Chairperson (or, in the absence of the Chairperson, the highest-ranking officer or longest serving board member in that succession), to appoint liaisons to the Department to act in urgent matters. Motion carried unanimously.

Delegation to Monitoring Liaison

MOTION: Randi Hanson moved, seconded by Amber Donovan, to delegate authority to the Monitoring Liaison(s) to make any determination on Orders under monitoring and to refer to the Full Board any matter the Monitoring Liaison deems appropriate. Motion carried unanimously.

Delegation to Department Monitor

MOTION: Kari Inda moved, seconded by Randi Hanson, to delegate authority to the Department Monitor as outlined below:

1. To grant reinstatement of licensure if education and/or costs are the sole condition of the order and the credential holder has submitted the required proof of completion for approved courses and paid the costs.
2. To suspend the license if the credential holder has not completed Board ordered education and/or paid costs and forfeitures within the time specified by the Board order. The Department Monitor may remove the suspension and issue an order when proof of completion and/or payment has been received.
3. To suspend the license (or remove stay of suspension) if a credential holder fails to enroll and participate in an Approved Program for drug and alcohol testing within 30 days of the order, or if credential holder ceases participation in the Approved Program without Board approval. This delegated authority only pertains to respondents who must comply with drug and/or alcohol testing requirements.
4. To grant or deny approval when a credential holder proposes treatment providers, mentors, and supervisors unless the Order specifically requires full-Board or Board designee approval.
5. To grant a maximum of one 90-day extension, if warranted and requested in writing by a credential holder, to complete Board ordered continuing, disciplinary, or remedial education.
6. To grant a maximum of one 90-day extension or payment plan for proceeding costs and/or forfeitures if warranted and requested in writing by a credential holder.

7. To grant a maximum of one 90-day extension, if warranted and requested in writing by a credential holder, to complete a Board ordered evaluation or exam.

Motion carried unanimously.

Delegation to Chief Legal Counsel Due to Loss of Quorum

MOTION: Laura O'Brien moved, seconded by Teresa Black, to delegate the review and authority to act on disciplinary cases to the Department's Chief Legal Counsel due to lack of/loss of quorum after two consecutive meetings. Motion carried unanimously.

Delegation to Chief Legal Counsel for Stipulated Resolutions

MOTION: Teresa Black moved, seconded by Randi Hanson, to delegate to DSPS Chief Legal Counsel the authority to act on behalf of the Board concerning stipulated resolutions providing for a surrender, suspension, or revocation of a credential, where the underlying merits involve serious and dangerous behavior, and where the signed stipulation is received between Board meetings. The Board further requests that CLC only act on such matters when the best interests of the Board, Department and the Public are best served by acting upon the stipulated resolution at the time the signed stipulation is received versus waiting for the next Board meeting. Motion carried unanimously.

Monitoring Delegations

Delegation of Authorities for Monitoring

MOTION: Randi Hanson moved, seconded by Laura O'Brien, to adopt the "Roles and Authorities Delegated for Monitoring" document as presented in the March 14, 2023, agenda materials on pages 12-14. Motion carried unanimously.

Delegation of Authorities for Legal Counsel to Sign Monitoring Orders

MOTION: Teresa Black moved, seconded by Laura O'Brien, to delegate to Legal Counsel the authority to sign Monitoring orders that result from Board meetings on behalf of the Board Chairperson. Motion carried unanimously.

Credentialing Authority Delegations

Delegation to Department Attorneys to Approve Duplicate Legal Issue

MOTION: Christine Kearns moved, seconded by Amber Donovan, to delegate authority to Department Attorneys to approve a legal matter in connection with a renewal application when that same/similar matter was already addressed by the Board and there are no new legal issues. Motion carried unanimously.

Delegation of Authority to Credentialing Liaison

MOTION: Laura O'Brien moved, seconded by Randi Hanson, to delegate authority to the Credentialing Liaison(s) to serve as a liaison between the Department and the Board and to act on behalf of the Board in regard to credentialing applications or questions presented to them, including the signing of documents related to applications. Motion carried unanimously.

Delegation of Authority to DSPS When Credentialing Criteria is Met

MOTION: Laura O'Brien moved, seconded by Kari Inda, to delegate credentialing authority to the Department to act upon applications that meet all credentialing statutory and regulatory requirements without Board or Board liaison review. Motion carried unanimously.

Delegation of Authority for Predetermination Reviews

MOTION: Laura O'Brien moved, seconded by Randi Hanson, to delegate authority to the Department Attorneys to make decisions regarding predetermination applications pursuant to Wis. Stat. § 111.335(4)(f). Motion carried unanimously.

Delegation to Department Attorneys to Approve Prior Discipline

MOTION: Terrance Erickson moved, seconded by Randi Hanson, to delegate authority to Department Attorneys to approve an applicant's prior professional discipline which resulted in a forfeiture/fine/other monetary penalty, remedial education, and/or reprimand, that is 10 years old or older, and the previously disciplined credential is currently in good standing. Motion carried unanimously.

Delegation of Authority for Conviction Reviews

MOTION: Laura O'Brien moved, seconded by Randi Hanson, to delegate authority to the Department Attorneys to review and approve applications with convictions which are not substantially related to the practice of occupational therapy. Motion carried unanimously.

Delegation to DSPS When Applicant's Discipline History Has Been Previously Reviewed

MOTION: Laura O'Brien moved, seconded by Randi Hanson, to delegate authority to Department staff to approve applications where Applicant's prior discipline has been approved for a previous occupational therapy credential and there is no new discipline. Motion carried unanimously.

Delegation to DSPS When Applicant's Conviction History Has Been Previously Reviewed

MOTION: Laura O'Brien moved, seconded by Teresa Black, to delegate authority to Department staff to approve applications where criminal background checks have been approved for a previous occupational therapy credential and there is no new conviction record. Motion carried unanimously.

Delegation of Authority for Reciprocity Reviews

MOTION: Teresa Black moved, seconded by Laura O'Brien, delegate authority to the Department Attorneys to review and approve reciprocity applications in which the out of state license requirements are substantially equivalent to the Board's requirements. Motion carried unanimously.

Delegation of Authority for Military Reciprocity Reviews

MOTION: Laura O'Brien moved, seconded by Randi Hanson, to delegate authority to the Department Attorneys to review and approve military reciprocity applications in which the individual meets the requirements of Wis. Stat. § 440.09. Motion carried unanimously.

Delegated Authority for Application Denial Reviews

MOTION: Laura O'Brien moved, seconded by Kari Inda, to delegate authority to the Department's Attorney Supervisors to serve as the Board's designee for purposes of reviewing and acting on requests for hearing as a result of a denial of a credential. Motion carried unanimously.

Pre-Screening Delegation to Open Cases

MOTION: Laura O'Brien moved, seconded by Teresa Black, to delegate pre-screening decision making authority to the Department screening attorney for opening cases as outlined below:

1. OWIs of 3 or more that occurred in the last 5 years.
2. Reciprocal discipline cases.
3. Impairment and/or diversion at work that includes a positive drug/alcohol test or admission by respondent.
4. Conviction of a misdemeanor or felony that the attorney believes is substantially related and is not otherwise excluded from consideration via Wis. Stat. ch. 111.
5. No response from the respondent after intake requested a response (case would be opened for the failure to respond issue as well as the merits).

Motion carried unanimously.

Pre-Screening Delegation to Close Cases

MOTION: Randi Hanson moved, seconded by Laura O'Brien, to delegate pre-screening decision making authority to the Department screening attorney for closing cases as outlined below:

1. One OWI that is non-work related and if AODA assessment completed, assessment does not indicate dependency.
2. Complaints that even if allegations are true, do not amount to a violation of law or rules.

Motion carried unanimously.

Voluntary Surrenders

MOTION: Teresa Black moved, seconded by Randi Hanson, to delegate authority to the assigned case advisor to accept or refuse a request for voluntary surrender pursuant to Wis. Stat. § 440.19 for a credential holder who has a pending complaint or disciplinary matter. Motion carried unanimously.

MOTION: Laura O'Brien moved, seconded by Kari Inda, to delegate authority to the Department to accept the voluntary surrender of a credential when there is no pending complaint or disciplinary matter with the Department pursuant to Wis. Stat. § 440.19. Motion carried unanimously.

Education and Examination Liaison(s) Delegation

MOTION: Randi Hanson moved, seconded by Laura O'Brien, to delegate authority to the Education and Examination Liaison(s) to address all issues related to education, continuing education, and examinations. Motion carried unanimously.

Authorization for DSPS to Provide Board Member Contact Information to National Regulatory Related Bodies

MOTION: Teresa Black moved, seconded by Laura O'Brien, to authorize the Department staff to provide national regulatory related bodies with all board member contact information that the Department retains on file. Motion carried unanimously.

Optional Renewal Notice Insert Delegation

MOTION: Laura O'Brien moved, seconded by Teresa Black, to designate the Chairperson (or, in the absence of the Chairperson, the highest-ranking officer or longest serving board member in that succession) to provide a brief statement or link relating to board-related business within the license renewal notice at the Board's or Board designee's request. Motion carried unanimously.

Legislative Liaison Delegation

MOTION: Laura O'Brien moved, seconded by Randi Hanson, to delegate authority to the Legislative Liaisons to speak on behalf of the Board regarding legislative matters. Motion carried unanimously.

Travel Authorization Liaison Delegation

MOTION: Kari Inda moved, seconded by Laura O'Brien, to delegate authority to the Travel Authorization Liaison to approve any board member travel to and/or participation in events germane to the board, and to designate representatives from the Board to speak and/or act on the Board's behalf at such events. Motion carried unanimously.

Website Liaison(s) Delegation

MOTION: Randi Hanson moved, seconded by Laura O'Brien, to authorize to the Website Liaison(s) to act on behalf of the Board in working with Department staff to identify and execute website updates. Motion carried unanimously.

Compact Liaison(s) Delegation

MOTION: Laura O'Brien moved, seconded by Randi Hanson, to delegate to the Compact Liaison the authority to act and answer questions on any matters related to the Occupational Therapy Licensure Compact. Motion carried unanimously.

Delegation to Handle Administrative Rule Matters

MOTION: Terrance Erickson moved, seconded by Christine Kearns, to delegate authority to the Chairperson (or, in the absence of the Chairperson, the highest-ranking officer or longest serving Board member in that succession), to act on behalf of the Board regarding administrative rule matters between meetings. Motion carried unanimously.

Review and Approval of 2025 Delegations including new modifications

MOTION: [Board member name] moved, seconded by [Board member name], to reaffirm all delegation motions made in 2025, as reflected in the March 10, 2026 agenda materials, which were not otherwise modified or amended during the March 10, 2026 meeting. Motion carried [].

AGENDA REQUEST FORM

1) Name and title of person submitting the request: Teri Black, Board Chair		2) Date when request submitted: 12/16/2025 Items will be considered late if submitted after 12:00 p.m. on the deadline date which is 8 business days before the meeting	
3) Name of Board, Committee, Council, Sections: Occupational Therapists Affiliated Credentialing Board			
4) Meeting Date: 3/10/2026	5) Attachments: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	6) How should the item be titled on the agenda page? Appending the Suffix /L to Credentials in Wisconsin – Board Discussion	
7) Place Item in: <input checked="" type="checkbox"/> Open Session <input type="checkbox"/> Closed Session	8) Is an appearance before the Board being scheduled? <i>(If yes, please complete Appearance Request for Non-DSPS Staff)</i> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	9) Name of Case Advisor(s), if applicable: N/A	
10) Describe the issue and action that should be addressed: The Board will discuss the attached documents.			
11) Authorization			
Signature of person making this request			Date
Supervisor (Only required for post agenda deadline items)			Date
Executive Director signature (Indicates approval for post agenda deadline items)			Date
Directions for including supporting documents: 1. This form should be saved with any other documents submitted to the Agenda Items folders. 2. Post Agenda Deadline items must be authorized by a Supervisor and the Policy Development Executive Director. 3. If necessary, provide original documents needing Board Chairperson signature to the Bureau Assistant prior to the start of a meeting.			

PUBLIC AGENDA REQUEST FORM

Instructions:

1. Fill out this form, and then save to your device.
2. Return to the "[Suggest an Agenda Item](#)" page and select the appropriate Board or Council from the Board/Council list.
3. Attach your completed "Public Agenda Request" form and send.

First Name: Wayne

Last Name: Winistorfer

Association/Organization: On my own behalf

Subject: Occupational Therapy Legally Authorized Titles

AGENDA TOPIC: I ask that the issue of Occupational Therapy use of titles, specifically appending licensed credentials with an "L" be affirmatively addressed, and that information to this effect be broadly distributed by DSPS to all occupational therapy licensees in the State of Wisconsin.

Rationale and Discussion:

I ask that the Occupational Therapy Affiliated Credentialing Board more thoroughly, and decisively address the issue that I brought to the OTACB public meeting on March 11, 2025. I requested that the OTACB and the Department of Safety and Professional Services publicize, to occupational therapy practitioners in the State of Wisconsin, that appending their licensed title with an "L" is incorrect, is not statutorily authorized and should be stopped.

At the time of the 3/11/25 meeting, I understood that DSPS took the position that, though the use of "L" is not authorized, the Department has no authority or resources to prosecute this practice. I was disappointed to learn that DSPS declined to announce to State of Wisconsin occupational therapy licensees, during the May, 2025 bi-annual renewal event, of this unauthorized addendum to licensed titles.

I have been asked many times during the past few months for me to personally offer clarification on this issue. You will see, *attached* to this form, the two-page document that I developed and shared with many occupational therapy practitioners.

This past October, I received an email from the Wisconsin Representative to the American Occupational Therapy Association, (who lives and practice OT in the LaCrosse area) seeking clarification on use of the "L". She informed me, in a series of email communications, that one of her work colleagues was engaged in conversations with a current member of the Wisconsin OTACB, who informed her that the "L" issue would again appear on the agenda for the OTACB meeting on December 16, 2025.

In a follow-up email, the Wisconsin Representative to AOTA reported that “my colleague shared that the person on the board had reached back out to her, and had also looped an attorney in on the interpretation. Apparently, the attorney stated it makes no difference whether WI OTPs use the L or not.”

My understanding is:

1. Though what was shared with me via emails, is certainly “playing telephone”, I cannot absolutely confirm the veracity of this conversation
2. The “**makes no difference**” position is inconsistent with what I heard from DSPS during the OTACB meeting of March 11, 2025 and not consistent with Statutory language
3. The use of licensed titles by occupational therapy practitioners in the State of Wisconsin is included in statutory language and Administrative Rules
4. In addition, I take exception to an individual member of the OTACB, and a DSPS attorney, rendering an opinion, that the constituent interpreted as an “official position” of the OTACB and the DSPS. I understand that official positions of any State licensing Board should be authorized by that Board during a public meeting, and NOT by an individual Board member’s declaration.

Addendum:

I am communicating with the staff at the American Occupational Therapy Association to have our national professional association post a comprehensive listing of legally authorized titles, on a state-by- state basis.

I have developed a DRAFT of the document that I am proposing to AOTA, and I ask for the Wisconsin OTACB and DSPS for your review of my DRAFT, for the section related to Wisconsin. (**Attached**)

ATTACHED DOCUMENT 1

DATE: May, 2025

TO: Occupational Therapy Practitioners licensed in the State of Wisconsin

FROM: Wayne L Winistorfer, MPA, OTR, FAOTA

RE: Legal Titles – **Do not use “/L” in the State of Wisconsin**

Statutory Authority: Wisconsin State Statute, 448.961: Definitions (*reference attached*)

Legal titles:

OTA - Occupational Therapy Assistant **COTA** – Certified Occupational Therapy Assistant

OT - Occupational Therapist **OTR** - Occupational Therapist – Registered

Titles NOT authorized or recognized within State of Wisconsin Statutes and Rules:

OTA/L	COTA/L
OT/L	OTR/L

State of Wisconsin Statutes and Administrative Rules relevant to occupational therapy **do NOT** include appending an “/L” to licensed titles.

Appending the licensed title, in the State of Wisconsin, with an “/L” **is NOT** a legal designation and is a redundant error. **Use of any of the four legally recognized Wisconsin license titles by an occupational therapy practitioner means the practitioner is licensed in Wisconsin.**

Use of these titles, and delivering occupational therapy services in the State of Wisconsin, **without a current license, is illegal.** Furthermore, occupational therapy “practice” includes:

- a. delivering evaluation, treatment, and consultative services,
- b. serving in administrative roles where the occupational therapy title is important,
- c. utilizing the occupational therapy credential, and presenting oneself as a Wisconsin licensed occupational therapy practitioner, while serving in a faculty role in an occupational therapy education program in the State of Wisconsin.

I have consulted with the State of Wisconsin - Occupational Therapy Affiliated Credentialing Board and the attorney and staff for the Department of Safety and

Professional Services. I was informed that I am correct that appending an “L” to the licensed credential is not authorized and is incorrect, however, there is no mechanism to prosecute anyone who appends their licensed credential in this way. ***Just because you cannot be prosecuted, does not make adding an “L” to your credential “right”!***

Think about it!

No licensed RNs in Wisconsin sign their credential/license as RN/L

No licensed physician in Wisconsin signs their credential/license as MD/L

No Speech Language Pathologist in Wisconsin signs their credential as SLP/L

Statements I have heard: *“It does not matter if I add “L” to my occupational therapy credential since I am not currently practicing.”*

and *“I am licensed, but I am not practicing occupational therapy. I am a faculty member teaching in an occupational therapy education program!”*

Response: If you are licensed in the State of Wisconsin, and you use your occupational therapy credential for any purpose, you must identify by one of the four legally authorized titles delineated in the State of Wisconsin Statutes: 448.996

Statement I have heard: *“I am licensed in another state. That state specifies that the “/L” is required for me to use my professional, licensed title in that state.”*

Response: If you are practicing (or teaching) in the State of Wisconsin, and you are using your professional credential, and declaring that you are legally licensed as an occupational therapy practitioner in Wisconsin, your license in any other jurisdiction is irrelevant! Any number of occupational therapy practitioners are licensed, and practice, in multiple states. You must use the title, and follow the applicable State regulations in the jurisdiction in which you are providing occupational therapy services.

Even when the **Occupational Therapy Interstate Compact** goes into effect, occupational therapy practitioners will be required to follow the occupational therapy practice regulations of the jurisdiction in which occupational therapy services are delivered.

Wisconsin Statutory References: 448.

“Licensee” means an individual granted a license under this subchapter.

- (3) “Occupation” means intentional, action-oriented behavior that is personally meaningful to an individual and that is determined by the individual’s characteristics, culture and environment.
- (4) “Occupational therapist” means an individual who is licensed by the affiliated credentialing board to practice occupational therapy or who holds an occupational therapist compact privilege.

- (5) “Occupational therapy” means the therapeutic use of purposeful and meaningful occupations to evaluate and treat individuals of all ages who have a disease, disorder, impairment, activity limitation or participation restriction that interferes with their ability to function independently in daily life roles and environments and to promote health and wellness.
- (6) “Occupational therapy assistant” means an individual who is licensed by the affiliated credentialing board to assist in the practice of occupational therapy under the supervision of an occupational therapist or who holds an occupational therapy assistant compact privilege.

History: [1999 a. 180](#) ss. [20](#), [22](#), [56](#); [2021 a. 123](#).

448.961 License required.

- (1) Except as provided in s. [448.962 \(1\)](#), no person may practice occupational therapy, designate himself or herself as an occupational therapist, claim to render occupational therapy services, or use the abbreviation “O.T.” or “O.T.R.” after the person’s name unless the person is licensed as an occupational therapist or holds a valid occupational therapist compact privilege.
- (2) Except as provided in s. [448.962 \(2\)](#), no person may assist in the practice of occupational therapy, describe himself or herself as an occupational therapy assistant, claim to render occupational therapy services as an occupational therapy assistant, or use the abbreviation “O.T.A.” or “C.O.T.A.” after the person’s name unless the person is licensed as an occupational therapy assistant or holds a valid occupational therapy assistant compact privilege.

History: [1999 a. 180](#) ss. [24](#), [28](#), [56](#); [2021 a. 123](#).

Cross-reference: See also ch. [OT 4](#), Wis. adm. code.

ATTACHMENT #2

Occupational Therapy Licensing: Use of Words or Titles by States

<i>Jurisdiction</i>	Statutory Language, Administrative Rules,	AOTA Board Member use of "L"
Arizona	<p>B. A person shall not use any of the following titles, or any letters, abbreviations or insignia of these titles, in connection with that person's name or place of business unless the person is licensed pursuant to this chapter: 1. Occupational therapist. 2. Licensed occupational therapist. 3. Occupational therapist registered. 4. Occupational therapy assistant. 5. Licensed occupational therapy assistant. 6. Certified occupational therapy assistant.</p>	B. Gross, /L
California	<p>CHAPTER 5.6. Occupational Therapy [2570 - 2572] 2570.18.</p> <p>(b) Unless licensed to practice as an occupational therapist under this chapter, a person may not use the professional abbreviations "O.T.," "O.T./L.," or "O.T.D.," "Occupational Therapist," "Occupational Therapist Licensed," "Occupational Therapist Doctorate," or any other words, letters, or symbols with the intent to represent that the person practices or is authorized to practice occupational therapy.</p> <p>(c) A licensee who has earned a doctoral degree in occupational therapy (OTD) or, after adoption of the regulations described in subdivision (e), a doctoral degree in a related area of practice or study may do the following:</p> <p>(1) In a written communication, use the initials OTD, DrPH, PhD, or EdD, as applicable, following the licensee's name.</p> <p>(2) In a written communication, use the title "Doctor" or the abbreviation "Dr." preceding the licensee's name, if the licensee's name is immediately followed by an unabbreviated specification of the applicable doctoral degree held by the licensee. (3) In a spoken communication while engaged in the practice of occupational therapy, use the title "Doctor" preceding the licensee's name, if the licensee specifies that he or she is an occupational therapy practitioner.</p> <p>(f) Unless licensed to assist in the practice of occupational therapy as an occupational therapy assistant under this chapter, a person may not use the professional abbreviations "O.T.A.," "O.T.A/L.," or "Occupational Therapy Assistant," "Licensed Occupational Therapy Assistant," or any other words, letters, or symbols, with the intent to represent that the person assists in, or is authorized to assist in, the</p>	<p>A Anvarizadah /L B Edwards /L Katie Jordan /L S Bream /L</p>

	practice of occupational therapy as an occupational therapy assistant.	
Florida	<p>468.203 Definitions.—As used in this act, the term:</p> <p>468.223 Prohibitions; penalties.—</p> <p>(1) A person may not:</p> <p>(b) Use, in connection with his or her name or place of business, the words “occupational therapist,” “licensed occupational therapist,” “occupational therapist doctorate,” “occupational therapist registered,” “occupational therapy assistant,” “licensed occupational therapy assistant,” “certified occupational therapy assistant”; the letters “O.T.,” “L.O.T.,” “O.T.D.,” “O.T.R.,” “O.T.A.,” “L.O.T.A.,” or “C.O.T.A.”; or any other words, letters, abbreviations, or insignia indicating or implying that he or she is an occupational therapist or an occupational therapy assistant or, in any way, orally or in writing, in print or by sign, directly or by implication, to represent himself or herself as an occupational therapist or an occupational therapy assistant unless the person is a holder of a valid license issued pursuant to ss. <u>468.201-468.225</u>;</p>	N Aldridge /L A Johnson /L
Illinois	<p>(225 ILCS 75/15) (from Ch. 111, par. 3715) (Section scheduled to be repealed on January 1, 2029)</p> <p>Sec. 15. Any person who is issued a license as an occupational therapist registered under the terms of this Act may use the words "occupational therapist" or "licensed occupational therapist", or may use the letters "O.T.", "OT/L", or "OTR/L", in connection with the licensee's name or place of business to denote the licensee's licensure under this Act.</p> <p>Any person who is issued a license as an occupational therapy assistant under the terms of this Act may use the words, "occupational therapy assistant" or "licensed occupational therapy assistant", or the licensee may use the letters "O.T.A.", "OTA/L", or "COTA/L" in connection with the licensee's name or place of business to denote the licensee's licensure under this Act. (Source: P.A. 103-251, eff. 1-1-24.)</p>	
Iowa	481—804.1(147) Definitions. F “Occupational therapist” means a person licensed under this chapter to practice occupational therapy. “Occupational	L Jackson /L

	therapy assistant” means a person licensed under this chapter to assist in the practice of occupational therapy. <i>(Note: I was unable to find any other administrative rule related to “use of titles”.)</i>	
Massachusetts	259 CMR: BOARD OF ALLIED HEALTH PROFESSIONALS 3.06: Designations (1) Occupational therapists shall use the initials OT after their name. (2) Students enrolled in an accredited program in occupational therapy shall use the initials OT/s after their name. (3) Occupational therapy assistants shall use the initials OTA after their name.	
Michigan	333.18303 Promulgation of rules; restricted use of words or titles; practice of occupational therapy or occupation therapy assistant; license required; exceptions. Sec. 18303. (1) After the rules described in sections 18307 and 18309 are promulgated for licensure under this article, an individual shall not use the titles "occupational therapist", "o.t.", "occupational therapist licensed", "o.t.l.", "occupational therapist registered", "o.t.r.", "occupational therapist registered licensed", "o.t.r.l.", "certified occupational therapy assistant", "c.o.t.a.", "certified occupational therapy assistant licensed", "c.o.t.a.l.", "occupational therapy assistant", "o.t.a.", "occupational therapy assistant licensed", "o.t.a.l.", or similar words which indicate that he or she is licensed as an occupational therapist or occupational therapy assistant unless the individual is licensed under this article.	
Minnesota	148.6403 LICENSURE; PROTECTED TITLES AND RESTRICTIONS ON USE; EXEMPT PERSONS; SANCTIONS. Subdivision 1.Unlicensed practice prohibited. A person must not engage in the practice of occupational therapy unless the person is licensed as an occupational therapy practitioner in accordance with sections 148.6401 to 148.6449 . Subd. 2.Protected titles and restrictions on use. Use of the phrase "occupational therapy" or "occupational therapist," or the initials "OT" alone or in combination with any other words or initials to form an occupational title, or to indicate or imply that the person is licensed by the state as an occupational therapist or occupational therapy assistant, is prohibited unless that person is licensed under sections 148.6401 to 148.6449 . Subd. 3.Use of "Minnesota licensed." Use of the term "Minnesota licensed" in conjunction with titles protected under this section by any person is prohibited unless that person is licensed under sections 148.6401 to 148.6449 . Subd. 4.Persons licensed or certified in other states. A person who is licensed in Minnesota and licensed or certified in another state may use the designation "licensed" or "certified" with a protected title only if the state of licensure or certification is clearly indicated.	

<p>New York</p>	<p>7902. Practice of occupational therapy and use of title "occupational therapy assistant". Only a person licensed or otherwise authorized under this title shall participate in the practice of occupational therapy as an occupational therapy assistant or use the title "occupational therapy assistant."</p> <p>§7902. Practice of occupational therapy and use of title "occupational therapist". Only a person licensed or otherwise authorized to practice under this article shall practice occupational therapy or use the title "occupational therapist".</p> <p>Use the designator: "OTR/L", "OT/L" COTA OTA <i>(note that OTA's are "registered" by the State of New York Department of Education and are not licensed)</i></p>	<p>R Hamed /L</p>
<p>Oregon</p>	<p>675.210 Definitions for ORS 675.210 to 675.340. As used in ORS 675.210 to 675.340, unless the context requires otherwise: (2) "Occupational therapist" means a person licensed to practice occupational therapy under ORS 675.210 to 675.340. (4) "Occupational therapy assistant" means a person licensed to assist in the practice of occupational therapy under the supervision of an occupational therapist.</p> <p>675.270 (a) Is currently certified as an occupational therapist registered (O.T.R.) or certified occupational therapy assistant (C.O.T.A.) by the National Board for Certification in Occupational Therapy; 675.320 Powers of board; fees; rules.</p> <p>Although you do not need to have current NBCOT certification to become licensed in Oregon, your employer may require the national certification. You can only use the R in OTR/L if you are currently NBCOT certified. If you are not currently NBCOT certified you must use OT/L. For an OT Assistant you can only use C in COTA if you are currently NBCOT certified. If you are not currently NBCOT certified, you must use OTA/L.</p> <p>For proper credential use, you must not combine educational credentials with certification credentials. For example, use MS, MOT, OTR. This would indicate that MS and MOT is awarded by the education institution. OTR is awarded by NBCOT for certification purposes.</p> <p>The Occupational Therapy Licensing Board shall have the following powers in addition to powers otherwise granted under ORS 675.210 to 675.340 or necessary to carry out the provisions of ORS 675.210 to 675.340: (12) To establish official abbreviations that may be used, under ORS 675.220 (1), by persons licensed as occupational therapists or occupational therapy assistants. <i>(NOTE: Though the Board has authority, Section 675.340 does NOT include specificity on use of titles.)</i></p>	<p>N Chang-Wright /L H Read /L</p>
<p>South Carolina</p>	<p>SECTION 40-36-30.Required licenses; practice while license suspended or revoked; penalty.</p> <p>No person may practice occupational therapy or may practice as an occupational therapy assistant without a license issued in accordance with this chapter. A person whose license has been suspended or revoked, who uses in connection with his name the words or letters "Occupational Therapist", "Licensed Occupational Therapist", "Occupational Therapist Registered", "Occupational Therapist Registered/Licensed", "O.T.", "L.O.T.", "O.T.R.", "O.T.R./L.", or "Occupational Therapy Assistant", "Certified Occupational Therapy Assistant", "Certified Occupational Therapy Assistant/Licensed", "O.T.A.", "L.O.T.A.", "C.O.T.A.", "C.O.T.A./L.", or any other letters, words, or insignia indicating</p>	<p>C Reyes Smith /L</p>

	that he is an occupational therapist or occupational therapy assistant, or who in any way, orally or in writing or in print or by sign directly or by implication, represents himself as an occupational therapist or occupational therapy assistant is deemed to be practicing occupational therapy or practicing as an occupational therapy assistant without being registered by the board	
Texas	<p>§369.3. Use of Titles. (a) Licensed occupational therapists shall use the title occupational therapist or the abbreviation OT. Occupational Therapist, Registered is an alternate title for occupational therapist and OTR® is an alternate abbreviation for OT if individuals who are licensed by this board take the responsibility for ensuring that they are qualified to use such by maintaining certification through NBCOT. Texas Board of Occupational Therapy Examiners June 2025 27 (b) Licensed occupational therapy assistants shall use the title occupational therapy assistant or the abbreviation OTA. Certified Occupational Therapy Assistant is an alternate title for occupational therapy assistant and COTA® is an alternate abbreviation for OTA if individuals who are licensed by this board take the responsibility for ensuring that they are qualified to use such by maintaining certification through NBCOT. (c) No other titles or abbreviations are conferred for a license from this board.</p> <p>(d) The use of the title doctor is governed by §454.007 of the Act (relating to Use of Title of Doctor).</p> <p>(e) The titles and abbreviations described by subsections (a) and (b) of this section must precede any other titles, abbreviations, academic degrees, or certifications (example: John Doe, OT, CHT or Jane Doe, OTR, PhD) with the following exception: if an occupational therapy practitioner is practicing in a higher education setting or is signing as an author for a publication that requires a recognized publication format, then the titles or abbreviations described by subsections (a) or (b) of this section may follow other titles, abbreviations, academic degrees, or certifications (Ex: John Doe, CHT, OT or Jane Doe, PhD, OTR). (f) Limitations. A person who does not hold a license to practice occupational therapy in Texas may not use any of the following terms in conjunction with the person's business, work, or services: (1) "occupational therapist," "licensed occupational therapist," "occupational therapist, registered"; (2) "occupational therapy assistant," "licensed occupational therapy assistant," "certified occupational therapy assistant"; (3) "OT," "OTR," "LOT," "OTR/L"; (4) "OTA," "COTA," "LOTA," "COTA/L"; or (5) any other words, letters, abbreviations, or insignia indicating or implying that the person is an occupational therapist or an occupational therapy assistant.</p> <p>Sec. 454.007. USE OF TITLE OF DOCTOR. An occupational therapist or occupational therapy assistant may not use the abbreviation "Dr.," the word "Doctor," or any suffix or affix indicating or implying that the person is a physician.</p>	Dahlia Castillo No "L" (apparently by her choice?)
Wisconsin	<p>License Required: Except as provided in s. 448.962 (1), no person may practice occupational therapy, designate himself or herself as an occupational therapist, claim to render occupational therapy services, or use the abbreviation "O.T." or "O.T.R." after the person's name unless the person is licensed as an occupational therapist or holds a valid occupational therapist compact privilege.</p> <p>Except as provided in s. 448.962 (2), no person may assist in the practice of occupational therapy, describe himself or herself as an occupational therapy assistant, claim to render occupational therapy services as an occupational therapy assistant, or use the abbreviation "O.T.A." or "C.O.T.A." after the</p>	

