



STATE OF NEVADA
BOARD OF OCCUPATIONAL THERAPY

6170 Mae Anne Ave., Suite 1 | Reno, Nevada 89523
Phone: (775) 746-4101 | www.nvot.org | Fax: (775) 746-4105

March 29, 2023

Office of the Governor
State Capitol Building
101 N. Carson Street
Carson City, NV 89701

Re: Governor's Executive Order 2023-004 Report

Honorable Governor Lombardo:

The Board of Occupational Therapy respectfully transmits the attached report on licensing requirements for the profession of Occupational Therapy.

Occupational therapists treat patients who have injuries, illnesses, or disabilities through the therapeutic use of everyday activities. About half of occupational therapists work in medical offices or in hospitals. Others work in schools, nursing homes, and home health services. Occupational therapists provide services for habilitation, rehabilitation and the promotions of health and wellness; occupational therapists assist clients in developing functional skills necessary to be considered for employment.

NRS 640A.050 defines "occupational therapy" as the use of evaluations, teachings and interventions to facilitate the activities of daily living of a client in groups or on an individual basis to enable the client to participate in and perform activities of daily living in various settings, including, without limitation, at home, at school, in the workplace and in the community.

Occupational Therapy practitioners are highly skilled providers of health care and are licensed in all 50 states and the District of Columbia.

The Board of Occupational Therapy has established a licensing process which is non-duplicative of national requirements for certification; recognizes the qualifications required for national certification; while ensuring practitioners are and remain qualified to practice professionally in this state.

Nevada is recognized as having one of the most efficient and timely licensing process in the nation for occupational therapy practitioners; Nevada addresses the challenges faced by military personnel, veterans and their respective spouses with expedited licensure and reduced fees¹; and Nevada provides occupational therapy practitioners with the highest wages for their profession in the nation².

¹ NRS 640A.166; 640A.190; NAC 640A.160

² US Bureau of Labor Statistics, Occupational Outlook Handbook

The Board of Occupational Therapy diligently oversees the practice of Occupational Therapy, NRS 640A and establishes through regulation, NAC 640A, the minimal requirements to ensure the safety and well-being of Nevada's residents. There are no regulations under Chapter 640A of Nevada Administrative Code that restrict entry into the profession of occupational therapy.

The Board of Occupational Therapy is committed to attracting and retaining qualified Occupational Therapists and Occupational Therapy Assistants; ensuring Nevada has the healthcare workforce necessary to serve its residents.

The Nevada Board of Occupational Therapy works alongside the Nevada Occupational Therapy Association, in providing outreach and information to practitioners of occupational therapy seeking employment and for the expansion of occupational therapy services in Nevada; and the American Occupational Therapy Association and the National Board of Certification in Occupational Therapy to ensure practitioners are educated, qualified and competent to practice in Nevada.

Thank you for providing this opportunity to provide information on Occupational Therapy practice in Nevada.

Respectfully submitted,

Loretta Ponton

Loretta L. Ponton
Executive Director

Attch: EO 2022-004 Report



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**Executive Order 2023-004 Report
Occupational and Professional Licensing Boards**

Board Overview of Regulatory History

NRS 640A – History of Regulations

The Board of Occupational Therapy was created in 1992, for the licensure of Occupational Therapists and Occupational Therapy Assistants. The first implementing regulations were approved, effective in 1995.

The state's administrative procedures require a complete review every 10 years and interim reviews every 3 years to ensure regulations are current.

- 9/18/08 – adopted regulations reflect the first full 10-year review conducted during 2006-2007; New sections were added and existing sections were revised and updated, including the fee structure.
 - 9/27/99; 9/20/02; 10/24/14; and 2/19/16 - additional revisions and clarifying regulations were adopted.
- 3/24/18 – adopted regulations reflect the second full 10-year review conducted by the Board. These regulations extended the term of a license to two (2) years with no increase in fees; added passage of the Nevada jurisprudence exam as a requirement for licensure; and established a reduced fee for initial licensure for veterans, active members of the military and spouses of veterans and active members of the military.
 - 12/30/19; 02/08/20; 11/06/21 – regulations revised renewal fees but did not increase initial licensure fees for biennial licensure as adopted in 2018; addressed telehealth services; and clarified other regulation sections.

The Board will be conducting its next full 10-year review of regulations after the 2025 Legislative Session with regulation revisions addressing potential legislative initiatives, including but not limited to the Occupational Therapy Compact, considering adoption by 2028.

Attachment 1 – Statutory / Regulatory History of the Board of Occupational Therapy

Section 1 – Regulations restricting entry into the profession of occupational therapy.

The Board of Occupational Therapy is committed to attracting and retaining qualified Occupational Therapists and Occupational Therapy Assistants; ensuring Nevada has the healthcare workforce necessary to serve its residents.

There are no regulations under Chapter 640A of Nevada Administrative Code that restrict entry into the profession of occupational therapy.

The Board of Occupational Therapy last conducted a full review of all regulations in 2018 with interim regulation updates at a minimum every 3 years. (See Attachment 1).

The Board has approved pending proposed regulation clarifications ready for public workshop in 2023; the proposed regulation does not contain any additional requirements that would restrict entry into the profession of occupational therapy.

The Board has a bill, AB 343, before the 2023 Legislature which will update NRS 640A to align with national eligibility criteria which will necessitate an update to NAC 640A. Attachment 2 highlights in red the proposed language revisions to be eliminated pertinent to initial licensure.

a. Pertinent Regulations – Initial Licensure;

Attachment 2 – NAC 640A Initial Licensure Regulations

NAC 640A.030 Prerequisites to receipt, renewal, reinstatement or conversion of status of license; fee; nonacceptance of late application for renewal of standard license.

NAC 640A.041 Eligibility to obtain Standard License

NAC 640A.062 Temporary licensing; conversion of temporary license to standard license.

NAC 640A.065 Provisional licensing; conversion of provisional license to standard license.

b. Fees and Costs – NAC 640A.160

Fees are established at a rate necessary to support the operations of the Board and are reviewed annually. Fees were lowered in 2018 by extending the term of a license from 1 year to 2 years with no increase in license fees; a slight increase in renewal fees was approved, effective for 2020 renewals, with no increase in initial license fees.

New applicant fees include a processing fee of \$150.00 and license fee.

Initial Fees: Occupational Therapist \$ 400; Occupational Therapy Assistant \$325.00	(2 year)
Temporary: Occupational Therapist \$ 300; Occupational Therapy Assistant \$250.00	(6 month)
Provisional: Occupational Therapist \$ 300; Occupational Therapy Assistant \$250.00	(6 month)

Military, Veterans and their spouses pay reduced initial registration fees of 50%.

c. Examinations – NAC 640A.030

The Board requires certification by the National Board for Certification in Occupational Therapy (NBCOT) which is the national examination organization for the practice of Occupational Therapy. Individuals must pass the certification examination in order to obtain their national certification.

Examination fees are paid directly to NBCOT when scheduling their examination.

A provisional license is available to new graduates who have been determined eligible to take the national certification examination. Provisional licensees must practice under the supervision of a license Occupational Therapist.

d. Other Requirements – Nevada Jurisprudence Examination

All applicants are required to complete the Nevada jurisprudence examination prior to licensure and every 5 years thereafter. The jurisprudence examination is on-line through the Board website and is open book with a 100% score required.

Section 2 – Justification of Regulations and Analysis of States.

a. Justification of current regulations

Regulations have undergone regular reviews at a minimum every 2 years. The Board of Occupational Therapy has aligned its licensing qualifications and requirements with national criteria and has expedited the licensing process through electronic on-line capabilities for all licensing processes.

The proposed modifications to initial license regulations related to AB 343 (noted in Section 1 above) will eliminate criteria that is the responsibility of the national certifying agency in determining eligibility for certification and examination.

b. Analysis of States who license the profession of occupational therapy.

Occupational Therapists and Occupational Therapy Assistants are licensed in all fifty (50) States in the United States and the District of Columbia.

Section 3 – Recommendations for revisions to current regulatory construct to expedite licensure.

There are no recommendations to the current regulatory construct to expedite licensure.

The Board of Occupational Therapy has an on-line application and data system which expedites license processing. The applicant can upload all required documents at time of application and pay the licensure fee during the application process.

Licenses are issued within 3 working days of receipt of a complete application; in most cases licenses are issued immediately.

Expedited licensing is available for military affiliated applicants where Board staff will assist with the verification of certification, current licenses held in another state and documentation uploads. Expedited processing ensure licenses are issued same day or as soon as possible.

Section 4 – State Compacts and Reciprocity

a. State Compacts - The Occupational Therapy Compact was ratified in 2022 with the initial 10 states joining the OT Compact. Currently there are 23 states who have passed legislation as members of the OT Compact. The first organizational meeting of the Compact Commission was held in August 2022; the organizational structure, staffing, database, rules, fees and reporting requirements remain to be completed. The first “compact privilege to practice” through the OT Compact is slated for 2024, after the structure and rules have been finalized. The OT Compact member states are: Alabama, Arizona, Arkansas, Colorado, Delaware,

Georgia, Iowa, Kentucky, Maine, Maryland, Missouri, Nebraska, New Hampshire, North Carolina, Ohio, South Carolina, Tennessee, Utah, Virginia, Washington, West Virginia, Wisconsin and Wyoming.

The Board of Occupational Therapy, through AB323 of the 2023 Legislative Session, is implementing a tiered approach toward a determination on whether Nevada should join the Occupational Therapy Compact. The legislation will allow licensure reciprocity for individuals residing in a Compact state. The utilization of reciprocity will provide baseline data for determining the impact of “compact privilege” to practice on the availability of services, number of individuals entering Nevada from Compact states who potentially would be eligible for “compact privilege” and potential fiscal impact to the Board resulting from loss of revenue from full licensing fees and increased expenses due to fees charged the Board for Compact participation, data system updates and implementation of initial background checks.

Currently licensure by endorsement remains available for out-of-state applicants and expedited licensure with reduced fees for military, veterans, and spouses is available through current NRS 640A provisions.

b. States with Reciprocity – There are no states that recognize full reciprocity. At a minimum, applicants must provide NBCOT certification status, and verification of licenses held in another state. Additional state level requirements may include, but are not limited to, criminal background checks, continuing education, jurisprudence examinations, and transcripts.

Nevada requires: NBCOT certification or NBCOT eligibility determination, verification of licensure in another state, if any, and completion of the Nevada jurisprudence examination.

c. Justification for not participating in Reciprocity – There is no need for reciprocity in Nevada; no other state has 100% reciprocity. The Nevada licensure requirements align with national standards and include expedited staff assisted processing in certain circumstances.

d. Action Plan for Reciprocity – None.

ATTACHMENT 1

Statutory / Regulatory History of the Board of Occupational Therapy

Board of Occupational Therapy

Legislation - Nevada Revised Statutes (NRS) 640A Laws

June 18, 1991

Board of Occupational Therapy was Created

- 1991 SB246: Created the Board of Occupational Therapy and established the initial role and responsibilities of the Board to license and regulate the practice of occupational therapy.
- 1995 SB 3: Removed the requirement that the OT Association must refer individuals to the Governor for appointment to the Board and established a process for the Governor to fill positions when a member resigns prior to the end of their term.
- 2003 SB 27: Added Athletic Trainers to professions exempt from licensure by the Board.
- 2005 SB 163: Added prohibition for renewal of a license if the person does not comply with child support orders; requires an applicant to provide their social security number on the application for licensure.
- 2007 SB 412: Clerical revisions to reference “Chapter” replacing reference to “Section”.
- 2009 SB 362: Requires complaints to be retained 10 years and added to unprofessional conduct subject to disciplinary action, the operation of a facility while that facilities license has been suspended or revoked.
- 2013** **SB 153:** The Board’s bill making major revisions and updates to NRS 640A. Added Occupational Therapists as a “provider of health care” in NRS 622 Healing Arts; and updated the Scope of Practice among other areas. Every section of the law was updated and/or revised to reflect current practices.
- SB 246: Added authority for inspection of premises, citations for unlicensed practice, filing of anonymous complaints, and referrals of complaints to appropriate Board or entity.
- 2015 AB 89: Provides authority for but does not require license by endorsement and expedited licensing for veterans, members of the military and families and establishes processing timelines for such applications.
- SB 68: Similar to AB 89 authorizing license by endorsement for other than military related individuals.
- 2017 SB 69: Requires Boards not otherwise authorized, to issue a license by endorsement, establishes timelines for issuance of a license by endorsement, and adds additional reporting requirements related to licensing activities; limits the term of a Board member to 12 years unless there are 250 or less licensees regulated; and revised provisions relating to payment of fees for legal services on a contingent basis.

- AB 19: Revises veteran-related information reporting requirements on licensees who have applied, been issued and renewed a license; report to be submitted annually.
- AB 328: Increased the revenue cap from \$75,000 to \$200,000, before an audit of the financial records are required. Under \$200,000 in revenue, a Board may provide an annual balance sheet; prohibits a person from being “employed” as an Executive Director for more than one Board; and prohibits an attorney employed by a Board from also prosecuting a case before the Board.
- SB 137: Adds additional questions that must be answered by a veteran applying for licensure.
- 2019 AB 275: Prohibits certain regulatory bodies from denying licensure of an applicant based upon his or her immigration or citizenship status; allows an applicant to provide a personal identification number if a social security number has not been issued when submitting an application.
- AB 319: Allows a person to petition a board for a determination of whether a criminal history will disqualify the person from obtaining a license. The bill also requires a regulatory body to submit information to the Sunset Subcommittee on how many petitions were received and the determination of the Board on those petitions.
- SB 219: Authorizes the acceptance of credit cards for all regulatory boards and charge a convenience fee; requires a board to establish written internal controls for all monetary withdraws and a review of expenditures and supporting documentation on a regular basis.
- SB 323 Requires an itemized statement of any legal fees and costs assessed to an individual as a result of a disciplinary action.
- SCR 6 Directs the Legislative Commission to conduct an interim study concerning professional and occupational licensing boards.
- 2021 AB253 Revises the requirements for conduct of public meetings to include meetings conducted by remote technology and revises posting requirements for public meetings and hearings.
- SB 196 Prohibits in certain circumstances, the conduct of a pelvic examination by a provider of health care.
- SB 217 Establishes the Board of Applied Behavior Analysis as an independent regulatory Board and adds Applied Behavior Analysts as providers of health care.
- SB 379 Directs the establishment of a health care provider databank for collection of specific demographic information; requires specific medical professions to collect the information upon renewal; and makes it optional for other health care regulatory boards to collect and submit the data.

Nevada Administrative Code (NAC) 640A Regulations

The first regulations of the Board were adopted effective 12/23/92; additional implementing provisions were added effective 5/23/95.

The formal administrative process for adoption of regulations was implemented after 1995. The state's administrative procedures require a complete review every 10 years and interim reviews every 3 years to ensure regulations are current.

- R083-99 Adopted 9/27/99: Adopted AOTA Code of Ethics and Standards of Practice, moved expiration date of license to June 30th, clarified continuing education activities, established OT can be provided in non-medical setting.
- R179-01 Adopted 9/20/02: Created a provisional license and established the requirements for obtaining that license, term of license, fee, and supervision of COTA and provisional licensee.
- R210-07 Adopted 9/18/08: This was the first major revision to the regulations after the Board conducted a complete review of its regulations codified in NAC 640A. New sections were added and existing sections were revised and updated, including the fee structure.
- R017-14 Adopted 10/24/14: Added requirements passed at the 2013 Legislative Session to require name tags, and to assess an administrative fine for practice with an expired license; establish the late renewal period at 30 days after expiration, allow a COTA to delegate duties to a technician or aid and removed fees for a name change and duplicate license.
- R048-15 Adopted 2/19/16: Updated continuing education requirements increasing the number of hours required to 12 hours annually. Twelve (12) hours of CE was required for license renewals beginning in 2017.
- R067-17 Adopted 3/24/18: Changed the term "Active" license to "Standard" license and extended the term of a Standard license to two (2) years with no increase in fees. Added passage of the Nevada jurisprudence exam as a requirement for licensure and mandated the jurisprudence exam to be completed at least once every five (5) years. Established a reduced fee for initial licensure for veterans, active members of the military and spouses of veterans and active members of the military. Revises the supervisory requirements for COTA and Provisional licensees to require a primary supervisor for each employer and the responsibilities of a treating occupational therapist and primary supervisor in the supervision of a licensee.
- R062-19 Adopted 12/30/19: Increased fees for biennial renewal of a license, and corresponding related fees for reinstatement and conversion of a license.
- R105-19 Adopted 02/08/20: Requires notification to the Board of employment or change in employment status; revises provisions relating to continuing education requirements to concur with a biennial renewal cycle;
- R001-21 Adopted 11/06/21: Establishes requirements for practice by telehealth; clarifies "treating occupational therapists" responsibilities; requires licensee to take certain measures to avoid actual or perceived conflicts of interest; sets forth requirements for the content of a verification of licensure; establishes different fees for a retired licensee to renew or convert an inactive license, revises provisions relating to delegation of duties to and supervision of occupational therapy assistants and provisional licensees.

Board of Occupational Therapy

The Board was created by Legislative action, effective June 18, 1991. The first Board members were appointed to staggered terms beginning with three members appointed effective January 1, 1992. Two additional members were appointed in 1994 and served through 2000, one year past their term end date. This created a situation of four positions being open at the same time. After thorough research by the Governor's office at the request of the Board, staggered terms were reinstated with appointments to modified terms beginning in 2014. The Board member positions are now back to staggered terms with no more than 2 positions open for appointment in any one year.

The licensing activities of the Board began in 1993 when the first 111 individuals obtained their state OT licenses. The Board's first Administrator was hired on a contract basis to handle the Board's administration. The Board did not have sufficient funding to open an office; all activities were conducted remotely.

In 2008, the Board licensing process was automated with the addition of a licensing and regulatory software system. The system includes automated on-line license renewal and compliance modules for auditing continuing education and supervision requirements. During 2020, the Board implemented on-line license applications to supplement the existing on-line license renewals, becoming 100% electronic, expediting the issuance and renewal of licenses.

By 2011, the number of licensees increased to 770 and the Board finances had strengthened. The Board approved a move to a physical office and the Board's Administrative Office opened to the public on August 1, 2011.

The current office includes a conference room for Board meetings, video or teleconferencing and other activities, and sufficient space to accommodate co-locations within the facility.

In 2018, the Board, acknowledging their strong financial position, set a goal of reducing cash reserves by extending the standard license term to 2-years without an increase in fees. This change resulted in cash savings to licensees resulting in a projected reduction of over \$250,000 in the Board's cash reserves. In 2020, the license renewal fees were slightly increased but new applicant fees remained at the previous levels.

Due to the impact of the COVID-19 state of emergency, the Board licensee numbers decreased in FY 2021 for the first time since 1992, impacting the Board's revenue. Reserve funds were utilized to support the Board's operations during the COVID-19 state of emergency.

The licensee base has again begun to increase which will stabilize revenue and normal operations have been restored.

COVID-19 Declaration of Emergency

The Board implemented two (2) emergency provisions to address the health care emergency in the State of Nevada due to COVID-19 state of emergency.

Emergency Temporary License

The Board approved emergency provisions for issuance of a temporary license by endorsement to include the waiver of the license fee and jurisprudence exam; and extended NBCOT certification to allow “inactive status” for new applicants who hold a current license in good standing in another state.

Option to Defer Renewal Fee

The Board approved the option to defer renewal fees for licensees whose current license expired during the state of emergency.

Historical Licensing History

FY 2010 – FY 2022

Fiscal Year	Total Licensees
2010	716
2011	770
2012	849
2013	871
2014	956
2015	1017
2016	1111
2017	1201
2018	1321
2019	1421
2020	1635
2021	1587
2022	1670
December 31, 2023	1711

ATTACHMENT 2

NAC 640A Initial Licensure Regulations

(Proposed Revisions are the responsibilities of National Board for Certification in Occupational Therapy.
Language in **Red, strikethrough** to be eliminated; language in **blue** to be added.)

NAC 640A.030 Prerequisites to receipt, renewal, reinstatement or conversion of status of license; fee; nonacceptance of late application for renewal of standard license. (NRS 640A.110, 640A.140)

1. In order to receive, renew, reinstate or convert the status of, as applicable, any type of license issued by the Board, an applicant must complete an application to be provided by the Board.
2. An application must be accompanied by payment of the appropriate fee or fees.
3. An application submitted to the Board must include a statement signed by the applicant certifying that the information provided in the application is accurate.
4. An application must be submitted to the Board by the applicable date, if any.
5. ~~—[If an applicant is required to provide an official transcript from an educational program that is accredited by an agency approved by the Board or from an educational program in another country, the applicant must ensure that:~~
 - ~~(a) A sealed, official transcript is attached to his or her application; or~~
 - ~~(b) A sealed, official transcript is sent directly from his or her educational program to the Board.]~~
6. If an applicant is required to provide proof of certification as an occupational therapist registered or a certified occupational therapy assistant, the applicant must ensure that proof of certification issued by the *National Board for Certification in Occupational Therapy* [~~certifying agency~~] is submitted to the Board.
7. If an applicant is required to provide proof of a license obtained in another state, territory or country, the applicant must ensure that proof of such a license issued by an official governmental entity is submitted to the Board for:
 - (a) Any such license presently held; and
 - (b) Any such license held within 5 years of the submission of the application.
8. If an applicant is required to provide proof of employment and supervision by an occupational therapist in this State, the applicant must ensure that proof of such employment and supervision is submitted to the Board, in a format approved by the Board, by the applicable date, if any.
9. If an applicant is required to complete continuing education, the applicant must provide to the Board proof of completion of continuing education, when requested by the Board.
10. The Board will not accept an application for the renewal of a license if the application is submitted more than 30 days after the date on which the license expired.

(Added to NAC by Bd. of Occupational Therapy, eff. 12-23-92; A 5-23-95; R083-99, 9-27-99; R1 79-01, 9-20-2002; R210-07, 9-18-2008; R01 7-14, 10-24-2014; R048-15, 4-4-2016; R067-17, 5-16-2018; **R076-21, 4-11-21**)

NAC 640A.041 Eligibility to obtain standard license. (NRS 640A.110, 640A.120) In addition to the requirements set forth in NAC 640A.030, to be eligible to obtain a standard license, a person must:

1. ~~—[Have graduated from:~~
 - ~~(a) An educational program which is accredited by an agency approved by the Board and which includes a fieldwork program; or~~
 - ~~(b) An educational program in another country;]~~
2. Have achieved a passing score on:
 - ~~(a) [An examination provided by an agency approved by the Board; and]~~
 - (b) The Nevada Occupational Therapy Jurisprudence Examination; *and*
3. Have current certification as an occupational therapist registered or certified occupational therapy assistant; *and*
4. ~~—[Be a citizen of the United States or otherwise have the legal right to work in the United States.]~~

(Added to NAC by Bd. of Occupational Therapy by R210-07, eff. 9-18-2008; A by R067-17, 5-

NAC 640A.062 Temporary licensing; conversion of temporary license to standard license.
([NRS 640A.110](#), [640A.170](#))

1. A person who is currently certified as an occupational therapist registered or certified occupational therapy assistant and who holds a license that is active and in good standing as an occupational therapist or occupational therapy assistant issued in another state or territory of the United States may apply to the Board for a temporary license to practice in this state by meeting the requirements set forth in [NAC 640A.030](#).

2. A temporary license expires 6 months after the date on which it is issued.

3. A temporary license may be renewed not more than once.

4. A temporary license may be converted to a standard license if the person:

(a) Meets the requirements set forth in [NAC 640A.030](#) and [640A.041](#); and

(b) For a temporary license as an occupational therapy assistant, submits proof of employment and supervision by a licensed occupational therapist upon conversion of the license.

5. A person who has previously been issued a temporary license may not apply for another temporary license until 6 months after the expiration of his or her last original or renewed temporary license, as applicable.

(Added to NAC by Bd. of Occupational Therapy, eff. 5-23-95; A by R083-99, 9-27-99; RI 79-01, 9-20-2002; R210-07, 9-18-2008; R067-17, 5-16-2018)

NAC 640A.065 Provisional licensing; conversion of provisional license to standard license.
([NRS 640A.110](#), [640A.120](#))

1. A provisional license may be granted to a person:

(a) Who meets the requirements set forth in [NAC 640A.030](#);

~~(b) [Who has graduated from an educational program which is accredited by an agency approved by the Board and which includes a fieldwork program;]~~

(c) Who submits proof of employment and supervision by a licensed occupational therapist upon receiving the license; and

(d) Who:

~~(1) [Is not certified as an occupational therapist registered or a certified occupational therapy assistant; or]~~

(2) Has not yet achieved a passing score on ~~[an examination provided by an agency approved by the Board]~~ *the national examination for certification in occupational therapy*, but is eligible and scheduled to take such an examination, with the results to be sent directly to the Board.

2. A provisional license expires 6 months after the date on which it is issued or renewed.

3. A provisional license may be renewed not more than once.

4. A provisional licensee may convert his or her provisional license to a standard license if, in addition to the requirements set forth in [NAC 640A.030](#) and [640A.041](#), the Board receives proof of the certification of the provisional licensee as an occupational therapist registered or a certified occupational therapy assistant.

(Added to NAC by Bd. of Occupational Therapy by RI 79-01, eff. 9-20-2002; A by R210-07, 9-18-2008; R067-17, 5-16-2018; R076-21, 4-11-21)

Question	Answer
Name of occupational or professional Licensing Board: Address: City: Zip: Telephone: Director Name: Director Email:	BOARD OF OCCUPATIONAL THERAPY 6170 Mae Anne Ave., Suite 1 Reno 89523 775-746-4101 Loretta L. Ponton board@nvot.org
Section 1: Has the above named occupational or professional licensing board suspended the creation of any new regulations that limit or otherwise impact the ability of persons to enter any occupation or profession in Nevada?	Yes

Section 2: Complete columns A-L below for each occupation or profession regulated by the Board.

List the Occupation or profession regulated by the Board (Name each occupation or profession on a separate line.)	List pertinent regulations pertaining to the entry into the occupation or profession	Provide the fees and other costs associated with the entry into the occupation or profession	Is an examination necessary for entry into the occupation or profession?	Are there any other requirements necessary for entry into the occupation or profession? (Please list, if any)	Provide the board's justification for the regulations, fees and other costs, examinations and other requirements necessary for entry into the occupation or profession	Do the majority of the states (26 or more) currently license the occupation or profession?	Identify any state compacts or any other pathways for licensure reciprocity that may exist regionally, nationally or internationally for the occupation or profession	Do the majority of states (26 or more) allow for license reciprocity for the occupation or profession?	Does Nevada currently participate in any reciprocity program for the occupation or profession?	If Nevada does not currently participate in any reciprocity program for the occupation or profession, provide a justification as to why	Provide any recommended revisions to the current regulatory construct that would expedite licensure for the occupation or profession	Section 3: A response in column M is required in any cell that has not been blacked out, which is based on your response in column (G).	Section 4: A response in column N is required in any cell that has not been blacked out, which is based on your response in columns (I) and (J)
Occupational Therapist	NAC 640A.080; NAC 640A.041; NAC 640A.062; NAC640A.065	Initial Processing \$150; License Fee \$250; Renewal Fee \$250; 50% Reduction in initial fees for military, veterans and spouses	Yes	National Certification or Eligible for the National Certification; Nevada Jurisprudence Exam	Fees required for processing applications and biennial licenses, fees are established at a rate to cover the costs of the Boards expenses.	Yes	The Occupational Therapy Compact was ratified in 2022 with the initial 10 states joining the OT Compact. The actual implementation of the OT Compact is slated for 2024.	No	No	There are no states that recognize full reciprocity.	There are no recommendations to the current regulatory construct to expedite licensure; licenses are issued within 3-5 days of application.		
Occupational Therapy Assistant	NAC 640A.080; NAC 640A.041; NAC 640A.062; NAC640A.065	Initial Processing \$150; License Fee \$175; Renewal Fee \$175; 50% reduction in initial fees for military, veterans and spouses	Yes	National Certification or Eligible for the National Certification; Nevada Jurisprudence Exam	Ex: Fee is required for processing of application, certificate of registration.	Yes	The Occupational Therapy Compact was ratified in 2022 with the initial 10 states joining the OT Compact. The actual implementation of the OT Compact is slated for 2024.	No	No	There are no states that recognize full reciprocity.	There are no recommendations to the current regulatory construct to expedite licensure; licenses are issued within 3-5 days of application.		