

**WEST VIRGINIA  
SECRETARY OF STATE  
NATALIE E. TENNANT  
ADMINISTRATIVE LAW DIVISION**

Form #7

Do Not Mark In This Box  
Filing Date

FILED

2009 MAY 13 AM 9:48

OFFICE WEST VIRGINIA  
SECRETARY OF STATE

Effective Date

**NOTICE OF AN EMERGENCY RULE**

AGENCY: West Virginia Board of Occupational Therapy TITLE NUMBER: 13

CITE AUTHORITY: W. Va. Code §30-28-6

EMERGENCY AMENDMENT TO AN EXISTING RULE: YES  NO

IF YES, SERIES NUMBER OF RULE BEING AMENDED: \_\_\_\_\_

TITLE OF RULE BEING AMENDED: \_\_\_\_\_

IF NO, SERIES NUMBER OF RULE BEING PROPOSED: \_\_\_\_\_ Series 5

TITLE OF RULE BEING PROPOSED: Competency Standards for Advanced Practice by Occupational Therapists and  
Occupational Therapy Assistants

THE ABOVE RULE IS BEING FILED AS AN EMERGENCY RULE TO BECOME EFFECTIVE AFTER APPROVAL BY SECRETARY OF STATE OR 42ND DAY AFTER FILING, WHICHEVER OCCURS FIRST.

THE FACTS AND CIRCUMSTANCES CONSTITUTING THE EMERGENCY ARE AS FOLLOWS:

With the passage of HB2309 during the 2009 Legislative Session, W. Va. Code §30-28, the WV Occupational Therapy Practice Act was amended and upon the effective date 90 days from passage, will include a restriction on occupational therapy assistants performing deep thermal or electrical modalities except under the direct supervision of an occupational therapist, until the WV Board of Occupational Therapy promulgates Legislative Rules to establish competency standards in this area. An Emergency Rule is needed to allow occupational therapy assistants who are adequately trained and competent in these modalities, to continue to perform these services to patients under the general supervision of an occupational therapist, as is current practice. This same Rule will be filed under the normal rule-making process for passage in the 2010 Legislative Session.

Use additional sheets if necessary

*Wanda Malnikoff*  
Authorized Signature

# West Virginia Board of Occupational Therapy



3041 University Avenue  
2<sup>nd</sup> Floor, Suite 6  
Morgantown, WV 26505  
304-285-3150 (fax & phone)  
[www.wvbot.org](http://www.wvbot.org)

May 6, 2009

To: Secretary of State and the LRMRC  
From: Kathy Quesenberry, MSM, OTR/L  
WVBOT President  
Re: Authority to file emergency rule

On behalf of the West Virginia Board of Occupational Therapy, please accept this letter authorizing the filing of an emergency rule to develop Competency Standards for Advanced Practice by Occupational Therapists and Occupational Therapy Assistants.

Sincerely,

*Kathy Quesenberry, MSM, OTR/L*

Kathy Quesenberry, MSM, OTR/L  
President

EMERGENCY RULE QUESTIONNAIRE

DATE: 5/12/09

TO: LEGISLATIVE RULE-MAKING REVIEW COMMITTEE

FROM: (Agency Name, Address & Phone No.) West Virginia Board of Occupational Therapy

3041 University Ave., 2nd Floor, Suite 6

Morgantown, WV 26505

304-285-3150

Contact: Vonda Malnikoff, Executive Secretary

vmalnikoff@wvbot.org

EMERGENCY RULE TITLE: Title 13

1. Date of filing 5/12/09

2. Statutory authority for promulgating emergency rule:

W.Va. Code 30-28-6

3. Date of filing of proposed legislative rule: 5/12/09

4. Does the emergency rule adopt new language or does it amend or appeal a current legislative rule? New language

5. Has the same or similar emergency rule previously been filed and expired?

No

6. State, with particularity, those facts and circumstances which make the emergency rule necessary for the **immediate** preservation of public peace, health, safety or welfare.

~~HB2309, amending WV Code 30-28, the WV Occupational Therapy Practice Act, goes into effect 7/10/09, ninety days from passage. One of the provisions in the Act requires the establishment of competency standards for OTA's to continue the current service of performing deep thermal or electrical modalities to patients under the general supervision of an OT, through the promulgation of Leg. Rules. Without an emergency rule, patients may not have access to needed treatments until the proposed legislative rule goes through the normal rule-making process during the 2010 Legislative Session.~~

7. If the emergency rule was promulgated in order to comply with a time limit established by the Code or federal statute or regulation, cite the Code provision, federal statute or regulation and time limit established therein.

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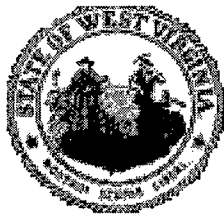
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8. State, with particularity, those facts and circumstances which make the emergency rule necessary to prevent substantial harm to the public interest.

~~Without an emergency rule establishing competency standards to allow trained and competent OTA's to continue providing deep thermal or electrical modalities under the general supervision of an OT, patients may not have access to needed treatments until the proposed legislative rule goes through the normal rule-making process during the 2010 Legislative Session.~~

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Vanda Malnikoff 5/12/09



**West Virginia Board of Occupational Therapy**

3041 University Avenue  
2<sup>nd</sup> Floor, Suite 6  
Morgantown, WV 26505  
304-285-3150  
[www.wvbot.org](http://www.wvbot.org)

TO: Secretary of State and the LRMRC

FROM: West Virginia Board of Occupational Therapy

DATE: May 12, 2009

RE: Brief Summary and Statement of Circumstances for Emergency Rule

During the 2009 Legislative Session, House Bill 2309 was passed, amending §30-28, the West Virginia Occupational Therapy Practice Act. In order to ensure passage, one of the provisions we had to include restricts Occupational Therapy Assistants (OTA's) from performing deep thermal or electrical modalities to patients, except under the direct supervision of an Occupational Therapist (OT), until the WV Board of Occupational Therapy promulgates Rules to establish competency standards in this area. Direct supervision requires that an OT be in the building at the time the service is being provided. As this is a service currently provided to patients by OTA's without direct supervision, an emergency rule is required to allow OTA's who are adequately trained and competent in such modalities to continue to provide this service under general supervision. These modalities are most often used with patients in skilled nursing facilities, many of which do not have a full time Occupational Therapist on site to provide direct supervision. Without an emergency rule, patients may not have access to needed treatments until the proposed legislative rule is passed through the normal rule-making process during the 2010 Legislative Session. We hope you will consider the implementation of an emergency rule in this situation in order to prevent substantial harm and to preserve the health, safety, and welfare of the public. If you have any further questions, please do not hesitate to contact the Board at the number above.

Sincerely,

*Kathy F. Quesenberry, MSM, OTR/L*  
Kathy Quesenberry, MSM, OTR/L  
President

*Martin Douglas, MS, OTR/L*  
Martin Douglas, MS, OTR/L  
Secretary / Treasurer

**FISCAL NOTE FOR PROPOSED RULES**

Rule Title: Title 13, Series 5 Competency Standards for Advanced Practice

Type of Rule:  Legislative  Interpretive  Procedural

Agency: West Virginia Board of Occupational Therapy

Address: 3041 University Ave.  
2nd Floor, Suite 6  
Morgantown, WV 26505

Phone Number: 304-285-3150 Email: vmalnikoff@wvbot.org

**Fiscal Note Summary**

Summarize in a clear and concise manner what impact this measure will have on costs and revenues of state government.

These changes will not effect the costs and revenues of state government as WVBOT is a self-funded Board.

**Fiscal Note Detail**

Show over-all effect in Item 1 and 2 and, in Item 3, give an explanation of Breakdown by fiscal year, including long-range effect.

<b>FISCAL YEAR</b>			
<b>Effect of Proposal</b>	<b>Current Increase/Decrease (use "-")</b>	<b>Next Increase/Decrease (use "-")</b>	<b>Fiscal Year (Upon Full Implementation)</b>
<b>1. Estimated Total Cost</b>			
Personal Services			
Current Expenses			
Repairs & Alterations			
Assets			
Other			
<b>2. Estimated Total Revenues</b>			

Rule Title: \_\_\_\_\_

Rule Title:

Title 13, Series 5 Competency Standards for Advanced Practice

3. **Explanation of above estimates (including long-range effect):**  
Please include any increase or decrease in fees in your estimated total revenues.

### MEMORANDUM

Please identify any areas of vagueness, technical defects, reasons the proposed rule **would not** have a fiscal impact, and/or any special issues **not** captured elsewhere on this form.

Although the Board is a state entity, its funding source is solely generated by fees paid by licensees.

Date: 5/12/09

Signature of Agency Head or Authorized Representative

Vonda Malnikoff

**TITLE 13  
LEGISLATIVE RULE  
BOARD OF OCCUPATIONAL THERAPY**

**SERIES 5  
COMPETENCY STANDARDS FOR ADVANCED PRACTICE BY  
OCCUPATIONAL THERAPISTS AND OCCUPATIONAL THERAPY ASSISTANTS**

**§13-5-1. General.**

1.1. Scope. -- This legislative rule establishes competency standards for advanced practice by occupational therapists and occupational therapy assistants

1.2. Authority. -- W. Va. Code §30-28-6.

1.3. Filing Date. --

1.4. Effective Date. --

**§13-5-2. Definitions.**

As used in this rule:

2.1. "ACOTE" means the Accreditation Council for Occupational Therapy Education.

2.2. "Advanced Practice" means treatment techniques or arenas which require education and training obtained subsequent to the qualifying degree program or beyond current ACOTE standards for the qualifying degree program.

2.3. "Board" or "WVBOT" means the West Virginia Board of Occupational Therapy.

2.4. "Deep thermal agent modalities" means therapeutic ultrasound and phonophoresis.

2.5. "Electrotherapeutic agent modalities" means neuromuscular electrical stimulation, transcutaneous electrical nerve stimulation, and iontophoresis.

2.6. "General Supervision" means initial direction, periodic inspection of service delivery, periodic meetings to review the outcome of service delivery, and the personal and direct involvement

of the supervisor in the licensed occupational therapy assistant's professional experience which can also include evaluation of his or her performance. The supervisor need not be present or on the premises at all times where the licensed occupational therapy assistant is performing the professional services. General supervision is demonstrated through co-signatures on all paperwork or electronic notes pertaining to the practice of occupational therapy for the person requiring general supervision. All paperwork or electronic notes pertaining to the practice of occupational therapy must be signed and dated, electronically or otherwise, by the supervising licensed occupational therapist.

2.7. "Mechanical modalities" means the therapeutic application of various forms of mechanical energy to the body, including traction and intermittent pneumatic compression (does not include spinal traction).

2.8. "Modality" means the employment of or the method of employment of a therapeutic agent.

2.9. "Physical Agent Modality (PAM)" means those modalities that produce a response in soft tissue through the use of light, water, temperature, sound, or electricity, and are used as an adjunct to or in preparation for purposeful activity.

2.10. "Superficial physical agent modality" means hot packs, cold packs, ice, fluidotherapy, paraffin, water, and other commercially available superficial heating and cooling devices.

2.11. "Occupational Therapist" means a person licensed to practice occupational therapy and whose license is in good standing.

2.12. "Occupational Therapy Assistant"

means a person licensed to assist in the practice of occupational therapy under the general supervision of the licensed occupational therapist and who license is in good standing.

**§13-5-3. Physical Agent Modalities in Occupational Therapy.**

3.1. Physical agent modalities may be used by occupational therapy practitioners when used as an adjunct to / or in preparation for purposeful activity to enhance occupational performance.

3.2. An occupational therapist shall not delegate evaluation, reevaluation, treatment planning, and treatment goals for physical agent modalities to an occupational therapy assistant.

3.3. Occupational therapy assistants and students of occupational therapy shall use modalities and techniques only when the individual has received the theoretical and technical preparation necessary for safe and appropriate integration of the intervention in occupational therapy.

3.4. When an occupational therapist delegates the use of modalities to an occupational therapy assistant or student, both shall:

3.4.a. Comply with appropriate supervision requirements as defined in §13-1-2; and

3.4.b. Assure that their use is based on service competency.

**§13-5-4. Competency Requirements for Occupational Therapy Assistants in the use of Physical Agent Modalities.**

4.1. To promote the safe provision of occupational therapy, this section sets forth the requirements which must be met before an

occupational therapy assistant may apply physical agent modalities.

4.2. Occupational therapy assistants may apply superficial thermal and mechanical modalities including, but not limited to, hot packs, cold packs, paraffin, fluidotherapy, and icing, under the general supervision of an occupational therapist, consistent with ACOTE standards for an educational program for occupational therapy assistants.

4.3. Any occupational therapy assistant who wishes to utilize advanced practice occupational therapy techniques involving deep thermal or electrical modalities under the general supervision of an occupational therapist, must maintain documented evidence of possessing the theoretical background and technical skills for safe and competent use.

4.4. The occupational therapy assistant is responsible for proving competency in the use of specific modalities and techniques.

4.5. Competency may be displayed through documented educational programs which include a method of evaluation and testing the knowledge of the therapist, including, but not limited to:

4.5.a. Accredited educational programs (including fieldwork education);

4.5.b. Specific certification;

4.5.c. Appropriate continuing education;

or

4.5.d. Inservice training.

4.6. Training shall be completed prior to the use of the specific modality. Documentation of training shall be made available to the Board upon request.



**West Virginia Board of Occupational Therapy**

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2<sup>nd</sup> Floor, Suite 6  
Morgantown, WV 26505  
304-285-3150  
[www.wvbot.org](http://www.wvbot.org)

TO: Judy Cooper

FROM: West Virginia Board of Occupational Therapy

DATE: May 12, 2009

RE: Emergency Rule Filing

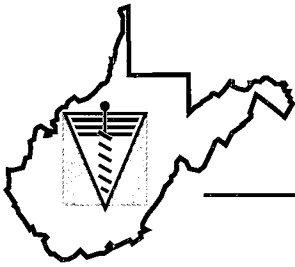
As we discussed last Thursday, May 07, 2009, attached are sixteen (16) copies of the Emergency Rule filing by the West Virginia Board of Occupational Therapy. Please forward one copy to the Legislative Rule Making Review Committee and return one stamped copy to me at the address above.

If you need any additional information or have any questions, please do not hesitate to contact me at the number above.

Sincerely,

  
Vonda Malnikoff  
Executive Secretary

enc.



# West Virginia Physical Therapy Association

*A chapter of the American Physical Therapy Association*

*The Science of Healing. The Art of Caring.*

May 14, 2009

Natalie E. Tennant  
Secretary of State  
State Capitol Complex  
Charleston, WV 25305

FILED  
2009 MAY 14 AM 10:55  
OFFICE WEST VIRGINIA  
SECRETARY OF STATE

Dear Secretary Tennant:

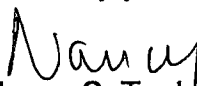
I am writing on behalf of the West Virginia Physical Therapy Association (WVPTA) to comment on the proposal by the West Virginia Board of Occupational Therapy to file Emergency Rules for competency requirements for licensees. The WVPTA worked with the members of the WV Association of Occupational Therapists and the WV Board of Occupational Therapy and agreed on language in HB 2309 during the recent legislative session. WVPTA supports the new practice act for occupational therapy.

The WVPTA does not oppose the filing of emergency rules to allow COTAs to continue their practice while establishing new competency standards.

As of this writing, the WVPTA has not seen the emergency rules being proposed. We will review them and make comments and work for any changes we feel might be needed after they are filed. However, to be clear, we do not oppose the rules being filed on an emergency basis.

Thank you for your consideration.

Sincerely yours,

  
Nancy S. Tonkin  
Executive Director

**Judy Cooper**

**From:** Leachman, Courtney [Courtney.Leachman@genesishcc.com]  
**Sent:** May 27, 2009 4:09 PM  
**To:** Judy Cooper  
**Cc:** Burbank, Miranda; Ford, Gina; vmalnikoff@wvbot.org  
**Subject:** Emergency Rule 13-5

FILED

2009 MAY 27 PM 4: 16

OFFICE WEST VIRGINIA  
SECRETARY OF STATE

Dear Ms. Cooper:

It has come to my attention that an update to the West Virginia Occupational Therapy Practice Acts has been approved by both the Senate and House of Delegates on April 11th, 2009 which greatly affects my practice and my patients. A provision was added late in the approval process that states there will be a temporary requirement that deep thermal (ultrasound and phonophoresis) and electrical agent modalities (neuromuscular electrical stimulation, TENS, and iontophoresis) only be performed by COTA's under the direct supervision of an OTR until the Board establishes competency standards through a legislative rule.

Direct supervision in this case means "the actual physical presence of a licensed supervising OT and the specific delineation of tasks and responsibilities for personally reviewing and interpreting the results of and habilitative or rehabilitative procedures." The concern I have with this provision is that I have seven patients at present on my caseload at my facility alone that benefit from both types of modalities, which are currently used by my COTA. The presence of these modalities make it possible for quicker, more functional outcomes to occur, especially with the neurologically-involved patient. There have also been cases where the modalities were necessary to achieve any outcome at all. Additionally, there are times when I am not available to be in our facility, i.e., covering treatments at another facility, attending meetings, attending CEU classes, vacation, etc. During these times, it would be detrimental to the patient's plan of care and to their resulting functional outcomes to stop all modalities on the days that I am not in the facility, especially since my COTA has extensive training in modality use.

I work for Genesis Rehab Services and we have the pleasure of working with Accelerated Care Plus (ACP). ACP is a company that provides our facilities with modality equipment for a rental fee and trains the rehab staff (OT, COTA, PT, PTA) on the safest, most appropriate way to carryout the modalities as an adjunct to/or in preparation for purposeful activity to enhance performance. We receive CEU credit for these classes as well. Genesis also has gone a step further to have required physical agent modality (PAM) certification for OT's and COTA's, which both myself and my COTA have completed. I am greatly for approving the proposed Title 13 Legislative Rule Board of Occupational Therapy Series 5 Competency Standards for Advanced Practice by Occupational Therapists and Occupational Therapy Assistants that would allow general supervision (initial direction, periodic inspection of service delivery, periodic meetins to review the outcome of the service delivery and the personal and direct involvement of the supervisor in the licensed COTA's professional experience which can also include evaluation of his/her performance. The supervisor need not be present or on the premises at all times where the licensed COTA is performing the professional services.) and maintain documented evidence of possessing the theoretical background and technical skills for safe and competent use of deep thermal and/or electrical modalities.

Thank you for your time and consideration.

Sincerely,

Courtney Leachman, MOTR/L, PM

Ravenswood Village  
200 S. Ritchie Avenue  
Ravenswood, WV 26164  
304.273.9385

This e-mail and any attachments may contain information which is confidential, proprietary, privileged or otherwise protected by law. The information is solely intended for the named addressee (or a person responsible for delivering it to the addressee). If you are not the intended recipient of this message, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this e-mail in error, please notify the sender immediately by return e-mail and delete it from your computer.

## Judy Cooper

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**From:** McManamay, Amy [Amy.McManamay@genesishcc.com]  
**Sent:** June 02, 2009 11:37 AM  
**To:** Judy Cooper  
**Subject:** COTAs

In order to adequately meet the needs of the seniors in the state of West Virginia, Certified Occupational Therapy Assistants need to have access to the most effective modalities to treat conditions such as pain, swelling, arthritis, and immobility. It is imperative that barriers preventing our seniors from receiving the best therapy that we have to offer be eliminated. Please insure that Certified Occupational Therapy Assistants have full access to these modalities and are able to freely treat our patients with indirect supervision from their supervising Occupational Therapist. If direct supervision is mandated we will not be able to provide the best care possible and our WV seniors will be at risk for physical and functional declines and suffer from pain and swelling unnecessarily. Thank you, Amy McManamay OTR/L

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2009 JUN -2 PM 1:43  
OFFICE WEST VIRGINIA  
SECRETARY OF STATE

**Judy Cooper**

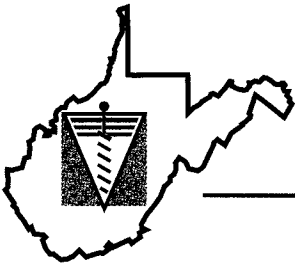
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# West Virginia Physical Therapy Association

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May 14, 2009

Natalie E. Tennant  
Secretary of State  
State Capitol Complex  
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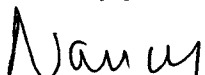
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