



MANPOWER AND
RESERVE AFFAIRS

OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE

1500 DEFENSE PENTAGON
WASHINGTON, D.C. 20301-1500

February 24, 2021

The Honorable Shane E. Pendergrass
Chair, Committee on Health & Government Operations
House Office Building, Room 241
6 Bladen St., Annapolis, MD 21401

RE: Memorandum of Support – HB540 – AN ACT concerning Interstate Occupational Therapy
Licensure Compact

Dear Delegate Pendergrass and Honorable Committee Members:

On behalf of military families and the Department of Defense, I am writing to provide comment regarding the policy changes proposed in Maryland SB0139 / HB0540, the Occupational Therapy Interstate Compact (OT Compact), which addresses licensing issues affecting our service members and their families. I would like to thank you for considering this issue in the 2021 session.

My name is Christopher Arnold. I am the Northeast Regional Liaison for the Defense-State Liaison Office, operating under the direction of Under Secretary of Defense for Personnel and Readiness, and the Deputy Assistant Secretary for Military Community and Family Policy. Our mission is to be a resource to state policymakers as they work to address quality of life issues of military families.

The purpose of the OT Compact is to facilitate interstate practice of occupational therapy with the goal of improving public access to occupational therapy services, while preserving the regulatory authority of states to protect public health and safety through the current system of state licensure.

Military spouses are a cross-section of the American population, although a greater percentage of them are in licensed occupations than their civilian counterparts, and they are significantly more mobile. DoD pivoted in its approach toward licensure after 2017 to consider occupational license compacts as another alternative to improve portability for military spouses. Compacts establish common understanding of competency and its measurement within the occupation, and then seek to have States approve the compact through legislation.

DoD encourages States to simultaneously fulfill what can be done as far as immediate actions, near-term actions, and long-term solutions, such as interstate licensing compacts. A 2018 study by the Federal Trade Commission recognized there are two approaches to alleviating barriers to portability for military spouse careers. Namely, mutual recognition, which relates to occupational compacts, and expedited licensure, which encompasses expedited exemption approaches.

Compacts can provide seamless reciprocity for military spouses in an occupation. Barriers to the transfer and acceptance of certifications and licenses that occur when state rules differ can have a dramatic and negative effect on the financial well-being of military families.

Removing these barriers, creating reciprocity in licensing requirements, and facilitating placement opportunities can help a military family's financial stability, speed the assimilation of the family into its new location, and create a desirable new employee pool for a state. The OT Compact addresses these licensing issues affecting our service members and their families.

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Portable employment opportunities support military spouse career development. Section 6 of the OT Compact allows an active duty servicemember, or their spouse, to designate a home state where the individual has a current license in good standing. This state then serves as the individual's home state for as long as the servicemember is on active duty, while adhering to the laws, rules and scope of practice in Maryland.

The coronavirus disease 2019 pandemic demonstrates that interstate licensure compacts can provide a permanent solution to leverage underutilized medical talent to meet labor shortages in high-need areas.

We appreciate the opportunity to support the policies outlined in the OT Compact introduced this session. Joining the OT Compact will allow military personnel and spouses to more easily maintain their certifications when relocating. Please feel free to contact me with any questions you might have.

Sincerely,

CHRISTOPHER R. ARNOLD

Northeast Region Liaison
Defense-State Liaison Office