

JCC News and Tips

September 21, 2016

OT Board Rule Changed Effective July 2016



The OT Board does not differentiate rules between the OTA and COTA Rules: they apply to both.

Supervision of an OTA with a Regular License: General Overview

*This is a general overview of §373.3 only. See the full **OT Act and Rules** for further information and regulations.*

An occupational therapy assistant shall provide occupational therapy services only under the supervision of an occupational therapist(s). All of the occupational therapists, whether working full time, part time, or PRN (i.e., working on an as-needed basis), who delegate to the occupational therapy assistant must participate in the supervision hours, whether on a shared or rotational basis.

Name of OT in Intervention Notes:

The occupational therapy assistant must include the name of a supervising OT in each intervention note. This may not necessarily be the occupational therapist who wrote the plan of care, but an occupational therapist who is readily available to answer questions about the client's intervention at the time of the provision of services. If this requirement is not met, the occupational therapy assistant may not provide services. This provision is not applicable to instruction provided pursuant to §372.2 of the OT Rules (relating to General Purpose Occupation-Based Instruction).

Required Supervision Hours for an OTA with a Regular License:

For each employer, the occupational therapy assistant must complete a separate Supervision Log and must complete the specified supervision hours, in addition to all other requirements. Supervision hours and logs for different employers may not be combined. See the link below under "Required Forms" to access the log.

Occupational therapy assistants must complete these types of supervision per month according to the following table:

Frequent Communication Supervision: frequent communication between the supervising occupational therapist(s) and occupational therapy assistant including, but not limited to, communication by electronic/communications technology methods, written report, and conference, including review of progress of clients assigned, plus *Interactive Supervision:* interactive supervision during which the occupational therapist directly observes the occupational therapy assistant providing services to one or more clients. Up to half of the required interactive supervision hours may be completed via visual and auditory, synchronous, real time, interactive electronic information/communications technologies.

Required Forms (accessible from the <http://www.ptot.texas.gov/page/ot-forms> and the links below):

OTA Supervision Form

- The OTA must submit this form to the Board for each employer with the employer information and name and license number of one of the OTs working for the employer who will be providing supervision.
- Changes to supervisor or employer information must be reported to the Board within 30 days.
- This form may be completed online (select the "Change of Supervision" form) or by downloading and submitting the OTA Supervision Form by mail, fax, or emailed to info@ptot.texas.gov as an attachment. If you have more than one employer, please download and submit the OTA Supervision Form instead of the online form.

OTA Supervision Log

- One log must be kept by the OTA for each employer with the names and license numbers of all supervising OTs.
- The OTA retains the log.
- The OT(s) signs the log when supervision is given.
- The OT(s) or employer may request a copy of the log.
- The log is subject to audit by the Board.

Excerpt from the OT Rules: (accessible from <http://www.ptot.texas.gov/page/ot-acts-and-rules>)

§373.3. Supervision of an Occupational Therapy Assistant

- (a) An occupational therapy assistant shall provide occupational therapy services only under the supervision of an occupational therapist(s).
- (b) Supervision of an occupational therapy assistant in all settings includes:
- (1) Supervision Form: For each employer, the occupational therapy assistant must submit the Occupational Therapy Assistant Supervision form with the employer information and name and license number of one of the occupational therapists working for the employer who will be providing supervision.
 - (2) Supervision Log and Supervision Hours:
 - (A) The occupational therapy assistant must complete supervision hours each month, which must be recorded on the Supervision Log. The Supervision Log is kept by the occupational therapy assistant and signed by the occupational therapist(s) when supervision is given. The occupational therapist(s) or employer may request a copy of the Supervision Log.
 - (B) All of the occupational therapists, whether working full time, part time, or PRN (i.e., working on an as-needed basis), who delegate to the occupational therapy assistant must participate in the supervision hours, whether on a shared or rotational basis.
 - (C) For each employer, the occupational therapy assistant must complete a separate Supervision Log and must complete the specified supervision hours, in addition to all other requirements. Supervision hours for different employers may not be combined.
 - (D) For those months when the licensee does not work as an occupational therapy assistant, he or she shall write N/A in the Supervision Log.
 - (E) Supervision Logs are subject to audit by the Board.
 - (F) Occupational therapy assistants must complete these types of supervision per month according to the following table:
 - (i) Frequent Communication Supervision: frequent communication between the supervising occupational therapist(s) and occupational therapy assistant including, but not limited to, communication by electronic/communications technology methods, written report, and conference, including review of progress of clients assigned, plus
 - (ii) Interactive Supervision: interactive supervision during which the occupational therapist directly observes the occupational therapy assistant providing services to one or more clients. Up to half of the required interactive supervision hours may be completed via visual and auditory, synchronous, real time, interactive electronic information/communications technologies.

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OTA Required Supervision Hours			
OTAs working 128 or more hours during a given month:	OTAs working between 70-127 hours during a given month:	OTAs working between 69-21 hours during a given month:	OTAs working 20 or fewer hours during a given month:
6 hours of frequent communication supervision			
3 hours of frequent communication supervision	2 hours of frequent communication supervision	1 hour of frequent communication supervision	
2 hours of interactive supervision			
1 hour of interactive supervision	1 hour of interactive supervision	30 minutes of interactive supervision	

See attached Log and information sheet.