TBOTE Linews

The Texas Board of Occupational Therapy Examiners

November 2025

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Previous newsletters, forms, and FAQs are available from the website: ptot.texas.gov.	

Next Board Meeting February 6, 2026* * Subject to change

TBOTE BOARD

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Notes from the Coordinator

Proposed and Adopted Rules

The Board adopted rule changes at its last meeting. See further information in this newsletter. The Board did not propose rule changes.

New Licensing System Reminder and Tip

The Executive Council of Physical Therapy and Occupational Therapy Examiners (ECPTOTE) transitioned in March to a new licensing system that allows for a greater integration of certain online and licensing functions, including concerning online renewal and initial licensure applications.

In order to access the system, any existing licensees will need to create an account in the new system and link their license to their online account.

Please note that this new system is different from the renewal portal on the ECPTOTE website that licensees renewing online must use to enter their CE activities and take the jurisprudence examination. Licensees still must complete these steps on the ECPTOTE website prior to submitting the online renewal application and fee in the new system.

Licensees must create an account in this new system in order to renew online and access other online features, such as online name change or replacement license applications, online license verification requests, etc.

Licensees may create an account for the new system and link their license to such at any time, though those approaching their three-month renewal window who are planning to renew online may wish to do so as soon as possible. These steps take some time and licensees are encouraged to not wait until the last minute in order to avoid unexpected issues, etc.

New System Tip

Create an account in the new system as early as possible, even if your license expiration date is still some time in the future. Creating an account well before renewing will help you avoid issues that might occur when creating an account for the first time. After you create an account, be sure to log in again once your renewal window opens to ensure you can still log in and that you have retained your username and password information. Using these strategies will help you avoid last-minute issues when renewing online.

Introduction to Adopted Rule Changes from the November Board Meeting The rule changes noted below will take effect December 1, 2025. Until then, the current rules are in effect.

At its recent meeting, the Board adopted amendments to §361.1, Statutory Authority, §364.1, Requirements for Licensure, §364.2, Initial License by Examination, §364.3, Temporary License, §364.4, Licensure by Endorsement, §364.5, Recognition of Out-of-State License of Military Service Members and Military Spouses, §369.1, Display of Licenses, §370.1, License Renewal, §370.2, Late Renewal, §370.3, Restoration of a Texas License, §371.1, Inactive Status, §371.2, Retired Status, §374.1, Disciplinary Actions, §374.2, Detrimental Practice, and §375.1, Fees.

As of December 1, 2025, the "June, 2025" compiled PDF version of the OT Rules will no longer be up to date as it will not contain the adopted changes. An up-to-date version of the compiled rules will be available from the <u>Act and Rules</u> page soon after the amendments take effect and will have "December, 2025" on the cover.

Notice of the adoptions was published in the November 21, 2025, issue of the <u>Texas Register</u>, and notice of the rule amendments as proposed, which includes the text of the proposals, was published in the August 29, 2025, issue of the <u>Texas Register</u>. The amendments were adopted without changes.

PDFs of the notices of proposal and adoption may be found on the Act and Rules page.

A brief introduction to the adopted rule amendments appears below; refer to the <u>Act and Rules</u> page for further information.

Adopted Rule Changes

§361.1. Statutory Authority

The amendments to the section concern cleanups, including to replace, with regard to the location of the Board's practice act, an outdated reference.

- §364.1. Requirements for Licensure
- §364.2. Initial License by Examination
- §364.3. Temporary License
- §364.4. Licensure by Endorsement

§364.5. Recognition of Out-of-State License of Military Service Members and Military Spouses

The amendments revise the sections, including to cleanup and clarify the sections, make changes to enhance the alignment of the sections with the Board's new licensing system, revise requirements, in general, and amend the sections pursuant to House Bill 5629 and Senate Bill 1818 of the 89th Regular

Legislative Session and the changes effective September 1, 2025, that were made by such to Texas Occupations Code Chapter 55.

For example, clarifying language is added with regard to applications that such are prescribed by the Board and cleanups include replacing "Examination" with "Exam" in §364.3, with regard to a form received from NBCOT.

The amendments include revisions to better align the sections with the Board's new licensing system and facilitate a more efficient licensing process, for example, by requiring that those applying for a temporary license submit an application for such. This will assist the Board in obtaining necessary application materials and information and ensure that the section requires an application as, due to components in the new system, the application for temporary licensure could no longer be embedded in the application for initial licensure.

A general change to the requirements in the sections pertains to removing the item in §364.1 concerning continuing an expired initial-licensing application for an additional year by submitting the application fee. The change to remove this process is made to increase the consistency in the rules and align such with the Board's other licensing applications, which expire after one year. The change will ensure that applicants meet current application requirements and that the information and required items submitted for such are accurate and not outdated.

Changes are also made pursuant to the 89th Legislative Session and House Bill 5629 and Senate Bill 1818, which amend Texas Occupations Code Chapter 55. The changes, which address fee waivers, expedited services, complaint recording and publishing information, and licensure requirements for military service members, military veterans, and military spouses, and the recognition of an out-of-state license for a military service member and military spouse, will align the sections and requirements with the recent legislation.

§369.1. Display of Licenses

The amendments cleanup and clarify the section and make changes to enhance the alignment of the section with the Board's new licensing system.

The amendments to the section include cleanups and clarifications. A cleanup is made, for instance, to remove language concerning a verification resource to match a similar change made elsewhere in the board rules as part of prior rulemaking and to align related online license verification information with other extant language.

Amendments to the section also include further clarifications and better align the section with the Board's new licensing system, which will facilitate a more efficient license-replacement process.

§370.1. License Renewal

§370.2. Late Renewal

§370.3. Restoration of a Texas License

The amendments revise the sections, including to cleanup and clarify the sections and amend the sections pursuant to House Bill 5629 and Senate Bill 1818 of the 89th Regular Legislative Session and the changes effective September 1, 2025, that were made by such to Texas Occupations Code Chapter 55.

The amendments to the sections include cleanups and clarifications. For example, cleanups to §370.3 include removing references to specific sections of Chapter 367, Continuing Education, of the board rules and replacing such with references to the whole chapter. This will ensure that the references are up-to date and that future changes to Chapter 367 that might relocate certain information to other areas of the chapter will not affect the continuing accuracy of §370.3.

The amendments also include clarifications, for example, by adding to the sections language such as "as prescribed by the Board," with regard to applications, and adding "Texas" in front of "Occupations Code" in §370.2.

Changes are also made concerning license restoration to §370.3 pursuant to the 89th Regular Legislative Session and House Bill 5629 and Senate Bill 1818, which amend Texas Occupations Code Chapter 55. The changes, which address fee waivers, expedited services, and complaint recording and publishing information with regard to military service members, military veterans, and military spouses, will align the sections and requirements with the recent legislation.

§371.1. Inactive Status

§371.2. Retired Status

The amendments cleanup and clarify the sections and make changes to enhance the alignment of the sections with the agency's new licensing system and support a more efficient licensing process.

Cleanups include changes to §371.1 to combine the requirements to put a license on and renew a license on inactive status as the requirements for both are equivalent. Similar changes are made, with regard to retired status, to §371.2. Such changes will simplify the sections.

The amendments to the sections include clarifications. For example, language is added, with regard to applications, that such are prescribed by the Board. A further clarification concerns the duration a licensee may remain on inactive status. §371.1(a) already included that one may remain on inactive status for no more than six consecutive years, but corresponding text did not also appear before "three renewals"; and a renewal cycle is of a two-year duration. The amendments will replace "three renewals" with "three consecutive renewal cycles" so that the text will include "A licensee may remain on inactive status for no more than three consecutive renewal cycles or six consecutive years."

The amendments also include the addition of a requirement that those seeking to return to active status from retired status submit a related application. The change will ensure that when such a request is submitted, the necessary information and materials are submitted, which will ensure a more efficient licensing process. Such will also facilitate the integration of this licensing action into the agency's new licensing system.

§374.1. Disciplinary Actions

§374.2. Detrimental Practice

The amendments will revise the sections, including to add items concerning reporting certain information to the Board and clarify and cleanup related items concerning detrimental practice.

An amendment to §374.1 will add a provision requiring licensees to report disciplinary action by another licensing authority and judgments or settlements in a malpractice claim. The amendment is adopted to ensure that the Board is apprised of such and, thus, better able to identify the possible need to investigate any related violations of the OT Act and Rules.

A related amendment to the Schedule of Sanctions in the section will include the addition of a violation that corresponds to the new item. Likewise, an additional amendment is made to the Schedule of Sanctions to add an item that corresponds to a similar, extant item in the section regarding reporting felony convictions. The amendments are adopted to identify the corresponding discipline for such violations.

The amendment to §374.2 will update the definition of "practiced occupational therapy in a manner detrimental to the public health and welfare" to clarify conduct that constitutes grounds for disciplinary action against license holders for failing to give sufficient prior written notice of resignation. The amendment will remove existing text that addresses a different term of notice for those with an existing contract or who are self-employed and have a comparable written agreement with clients; the change will ensure that the item specifies that fourteen days' written notice is required. The change will clarify the provision and the required minimum days' notice that must be given by licensees to help ensure that sufficient notice is given to avoid the loss or delay of occupational therapy services. The revision will also add language to the provision identifying such as "patient abandonment." A related change to the Schedule of Sanctions in §374.1 is made to correspond to the revision. The amendments are adopted to ensure that the rules clearly identify the conduct that may be considered detrimental practice and the corresponding discipline. The changes will also facilitate the ability of individuals and the Board to identify violations and related discipline in order to ensure the health, safety, and welfare of the public.

The amendments include further cleanups.

§375.1. Fees.

The amendments clarify and cleanup the section and remove unnecessary provisions.

The amendments to the section include clarifications. For example, revisions include replacing "TAC" with Texas Administrative Code and clarifying and simplifying text concerning refunds to correspond to extant language elsewhere in the board rules that fees are non-refundable.

The amendments also remove an outdated reference to the requirement that applicants for a license pay the application fee plus the appropriate license fee. In the past, such fees were consolidated into one application fee and the amendments are made to ensure that the section reflects such changes. Further cleanups include removing a provision concerning payments after an insufficient funds check has been processed by the Board and an item concerning the suspension of a license for failure to pay child support as such are no longer necessary; in the case of the former, an individual is not required to submit payment in a particular manner after such an issue has been resolved and, in the case of the latter, the Board does not suspend licensees for such as §370.1(b) of the board rules already includes that the Board will not renew a license if it receives information from a child support agency that a licensee has failed to pay child support under a support order for six months or more as provided by Texas Family Code §232.0135 and that if all other renewal requirements have been met, the license will be renewed when the child support agency notifies the Board it may renew the license. Such amendments will ensure that the section, likewise, reflects the other current extant rules and licensure processes.

CE Reminder

As per §367.3(c) of the OT Rules, "The licensee is solely responsible for keeping accurate documentation of all continuing education requirements. Continuing education documentation must be maintained for auditing purposes for four years from the end of the expiration month of the corresponding renewal period or for a late renewal or a restoration, for four years from the end of the month when the late renewal or restoration was completed."

Consider strategies to enhance access to your stored CE documentation by creating a back-up system, such as keeping a second copy in a different location. This way, if you are randomly selected for the OT CE Audit or otherwise must access your materials, you will have more than one method to do so.

For example, consider keeping electronic copies of your documentation in addition to the physical copies. If you scan your CE documentation and email yourself the file, you will have a copy you might access from any internet connection, regardless of your location or the physical condition of your documents.



NOVEMBER 7, 2025, BOARD MEETING FORMAL DISCIPLINARY ACTIONS TAKEN

Whitney Marshall, OT #118802 (Georgetown) - failed to properly renew license during the audited renewal period. Violation of Section 454.301 of the Act and Chapter 367 of the board rules. *Board Order required 30 hours of community service.*

Deylene Santos, OT #115485 (Plano) - practiced in a detrimental manner by practicing occupational therapy after the expiration of the license. Violation of Section 454.301 of the Act and Chapter 374 of the board rules. **Board Order required 60 hours of community service.**

Sherry Mohan, OT #119944 (Sugar Land) - practiced in a detrimental manner by practicing occupational therapy after the expiration of the license. Violation of Section 454.301 of the Act and Chapter 374 of the board rules. **Board Order suspended license to practice for 7 days.**

Jennifer Norgaard, OTA #215600 (Granbury) - practiced in a detrimental manner by practicing occupational therapy after the expiration of the license. Violation of Section 454.301 of the Act and Chapter 374 of the board rules. **Board Order suspended license to practice for 15 days.**

Kristen Copley, OTA #214061 (Kyle) - practiced in a detrimental manner by practicing occupational therapy after the expiration of the license. Violation of Section 454.301 of the Act and Chapter 374 of the board rules. **Board Order suspended license to practice for 20 days.**

Junior Lemonier, OTA #216115 (Houston) - practiced in a detrimental manner by failing to document occupational therapy services or inaccurately recording, falsifying, or altering client records. Violation of Section 454.301 of the Act and Chapter 374 of the board rules. **Board Order suspended license to practice for 30 days.**

Jephter Ekong, OTA #212693 (Cypress) - practiced in a detrimental manner by failing to document occupational therapy services or inaccurately recording, falsifying, or altering client records. Violation of Section 454.301 of the Act and Chapter 374 of the board rules. **Board Order suspended license to practice for 30 days.**

Stephanie Madden, OT #121727 (Georgetown) - practiced in a detrimental manner by failing to document occupational therapy services or inaccurately recording, falsifying, or altering client records. Violation of Section 454.301 of the Act and Chapter 374 of the board rules. *Board Order suspended license to practice for 45 days.*

Tiffani Cole, OT #121508 (La Coste) - practiced in a detrimental manner by failing to document occupational therapy services or inaccurately recording, falsifying, or altering client records. Violation of Section 454.301 of the Act and Chapter 374 of the board rules. **Board Order suspended license to practice for 60 days.**

Harwin Wo, OT #118972 (Plano) - practiced in a detrimental manner by failing to document occupational therapy services or inaccurately recording, falsifying, or altering client records. Violation of Section 454.301 of the Act and Chapter 374 of the board rules. **Board Order suspended license to practice for 90 days.**

Grace Covarrubias, OTA #207522 (Lubbock) - practiced in a detrimental manner by failing to document occupational therapy services or inaccurately recording, falsifying, or altering client records and by failing to provide sufficient prior written notice of resignation of employment resulting in the loss or delay of occupational therapy services. Violation of Section 454.301 of the Act and Chapter 374 of the board rules. **Board Order suspended license to practice for 45 days.**

Olga Diaz, OT #111786 (McAllen) - practiced in a detrimental manner by failing to document occupational therapy services or inaccurately recording, falsifying, or altering client records and by failing to provide sufficient prior written notice of resignation of employment resulting in the loss or delay of occupational therapy services. Violation of Section 454.301 of the Act and Chapter 374 of the board rules. **Board Order suspended license to practice for 60 days.**

Letha Francis, OT #125504 (Bowie, MD) - practiced in a detrimental manner by failing to document occupational therapy services or inaccurately recording, falsifying, or altering client records and by failing to provide sufficient prior written notice of resignation of employment resulting in the loss or delay of occupational therapy services. Violation of Section 454.301 of the Act and Chapter 374 of the board rules. **Board Order accepted the surrender of license to practice.**

Courtney Bowers, OT #114115 (Carrollton) - practiced in a detrimental manner by failing to document occupational therapy services or inaccurately recording, falsifying, or altering client records and violating Provision of Services by failing to request and include a medical referral. Violation of Section 454.301 of the Act and Chapters 372 and 374 of the board rules. **Board Order suspended license to practice for 60 days.**

Naomi Solomon, OT #125558 (Garland) - failed to disclose criminal history on application for licensure. Violation of Section 454.301 of the Act and Chapter 364 of the board rules. **Board Order suspended license to practice for 15 days.**

Erin McCarthy, OT #116857 (Houston) - failed to cooperate with the agency by not responding to agency correspondence addressed to the individual's designated address(es) within 90 days regarding the undisclosed criminal history on application for licensure. Violation of Section 454.301 of the Act and Chapters 364 and 374 of the board rules. **Board Order suspended license to practice for 30 days.**