

**Zero-Based Regulation
Prospective Analysis**

- **Fill out entire form to the best of your ability, unless submitting a Notice to Negotiate only fill out 1, 2, 5, and 7. The rest of the form must be completed prior to the adoption of the proposed rule.**

Agency Name: Idaho Division of Occupational and Professional Licenses

Rule Docket Number: 24-0601-2501

1. What is the specific Idaho statutory legal authority for this proposed rule?

Statute Section (include direct link)	Is the authority mandatory or discretionary?

2. Define the specific problem that the proposed rule is attempting to solve? Can the problem be addressed by non-regulatory measures?

The State Occupational Therapy Licensure Board is financially in the negative and requires a fee increase to become solvent.

This cannot be addressed without regulations change, as all administrative rules and statutes must be approved by the Idaho State legislature, and Idaho Code section 67-9402(2) states that all fees for licensing boards must be in rule or code by July 1st, 2026.

3. How have other jurisdictions approached the problem this proposed rule intends to address?

a. Is this proposed rule related to any existing federal law?

Federal citation	Summary of Law (include direct link)	How is the proposed Idaho rule more stringent? (if applicable)

b. How does this proposed rule compare to other state laws?

State	Summary of Law (include direct link)	How is the proposed Idaho rule more stringent? (if applicable)
Washington		
Oregon		
Nevada		
Utah		
Wyoming		
Montana		
Alaska		
South Dakota		

c. If the Idaho proposed rule has a more stringent requirement than the federal government or the reviewed states, describe the evidence base or unique circumstances that justifies the enhanced requirement:

N/A

4. What evidence is there that the rule, as proposed, will solve the problem?

Cash balance forecasts show that this relatively modest increase in licensing fees should allow the board to regain a healthy cash balance.

5. What is the anticipated impact of the proposed rule on various stakeholders? Include how you will involve stakeholders in the negotiated rulemaking process?

Category	Potential Impact
Fiscal impact to the state General Fund, any dedicated fund, or federal fund	
Impact to Idaho businesses, with special consideration for small businesses	
Impact to any local government in Idaho	

6. What cumulative regulatory volume does this proposed rule add?

Category	Impact
Net change in word count	
Net change in restrictive word count	

7. Should this rule chapter remain as a rule chapter or be moved to statute as suggested in Section 67-5292, Idaho Code?

Category	Impact
What is the cost of publishing this rule chapter annually? (Multiply the number of pages x \$56)	
How frequently has this rule chapter been substantively updated over the past 5 years? (Exclude republishing triggered solely by recent sunset dates)	
What is the benefit of having all related requirements in a single location in Idaho Code?	

Occupational Therapy

State Law Comparison

State	Summary of Law (include direct link)																
Alaska	<p>The following fees are established for physical therapists, physical therapist assistants, occupational therapists, and occupational therapy assistants:</p> <p>(1) application fee for initial license, \$150;</p> <p>(2) license fee for physical or occupational therapist for all or part of the initial biennial license period, \$200;</p> <p>(3) biennial license renewal fee for physical or occupational therapist, \$200;</p> <p>(4) temporary permit fee, \$65;</p> <p>(5) limited permit fee, \$65;</p> <p>(6) license fee for physical therapist assistant or occupational therapy assistant for all or part of the initial biennial license period, \$130;</p> <p>(7) biennial license renewal fee for physical therapist assistant or occupational therapy assistant, \$130.</p> <p>https://www.law.cornell.edu/regulations/alaska/12-AAC-02.320</p>																
Montana	<p>Application and License Fee</p> <p>Occupational Therapist Application Fee - \$190</p> <p>Superficial Endorsement Modality Application - \$20</p> <p>Topical Medications Modality Endorsement Application - \$20</p> <p>Renewal Fee</p> <p>Active and Late: \$110 / Inactive Fee: \$50</p>																
Nevada	<p>(a) For an occupational therapist:</p> <table> <tr> <td>(1) Initial standard license.....</td><td>\$250</td></tr> <tr> <td>(2) Renewal of a standard license.....</td><td>175</td></tr> <tr> <td>(3) A temporary or provisional license.....</td><td>150</td></tr> <tr> <td>(4) Renewal of a temporary or provisional license.....</td><td>100</td></tr> <tr> <td>(5) Convert a temporary or provisional license to a standard license.....</td><td>100</td></tr> <tr> <td>(6) Reinstatement of an expired license.....</td><td>200</td></tr> <tr> <td>(7) Renewal of an inactive license.....</td><td>100</td></tr> <tr> <td>(8) Convert an inactive license to a standard license.....</td><td>75</td></tr> </table>	(1) Initial standard license.....	\$250	(2) Renewal of a standard license.....	175	(3) A temporary or provisional license.....	150	(4) Renewal of a temporary or provisional license.....	100	(5) Convert a temporary or provisional license to a standard license.....	100	(6) Reinstatement of an expired license.....	200	(7) Renewal of an inactive license.....	100	(8) Convert an inactive license to a standard license.....	75
(1) Initial standard license.....	\$250																
(2) Renewal of a standard license.....	175																
(3) A temporary or provisional license.....	150																
(4) Renewal of a temporary or provisional license.....	100																
(5) Convert a temporary or provisional license to a standard license.....	100																
(6) Reinstatement of an expired license.....	200																
(7) Renewal of an inactive license.....	100																
(8) Convert an inactive license to a standard license.....	75																

	<p>(b) For an occupational therapy assistant:</p> <table> <tr> <td>(1) Initial standard license.....</td><td>\$175</td></tr> <tr> <td>(2) Renewal of a standard license.....</td><td>125</td></tr> <tr> <td>(3) A temporary or provisional license.....</td><td>100</td></tr> <tr> <td>(4) Renewal of a temporary or provisional license.....</td><td>75</td></tr> <tr> <td>(5) Convert a temporary or provisional license to a standard license.....</td><td>75</td></tr> <tr> <td>(6) Reinstatement of an expired license.....</td><td>125</td></tr> <tr> <td>(7) Renewal of an inactive license.....</td><td>75</td></tr> <tr> <td>(8) Convert an inactive license to a standard license.....</td><td>50</td></tr> </table> <p>(c) General:</p> <table> <tr> <td>(1) Processing of an initial license application.....</td><td>\$150</td></tr> <tr> <td>(2) Late fee for renewal of a license.....</td><td>125</td></tr> <tr> <td>(3) Verification of a license.....</td><td>25</td></tr> <tr> <td>(4) Returned payment processing.....</td><td>25</td></tr> </table> <p>https://www.leg.state.nv.us/nac/nac-640a.html#NAC640ASec160</p>	(1) Initial standard license.....	\$175	(2) Renewal of a standard license.....	125	(3) A temporary or provisional license.....	100	(4) Renewal of a temporary or provisional license.....	75	(5) Convert a temporary or provisional license to a standard license.....	75	(6) Reinstatement of an expired license.....	125	(7) Renewal of an inactive license.....	75	(8) Convert an inactive license to a standard license.....	50	(1) Processing of an initial license application.....	\$150	(2) Late fee for renewal of a license.....	125	(3) Verification of a license.....	25	(4) Returned payment processing.....	25
(1) Initial standard license.....	\$175																								
(2) Renewal of a standard license.....	125																								
(3) A temporary or provisional license.....	100																								
(4) Renewal of a temporary or provisional license.....	75																								
(5) Convert a temporary or provisional license to a standard license.....	75																								
(6) Reinstatement of an expired license.....	125																								
(7) Renewal of an inactive license.....	75																								
(8) Convert an inactive license to a standard license.....	50																								
(1) Processing of an initial license application.....	\$150																								
(2) Late fee for renewal of a license.....	125																								
(3) Verification of a license.....	25																								
(4) Returned payment processing.....	25																								
Oregon	<p>339-005-0000</p> <p>Fees</p> <p>Fees are non refundable. Two year licenses shall be issued to all licensees in even-numbered years at the fee schedule listed below. On a case-by-case basis the Board may approve the issuance of a one-year license.</p> <p>(1) The fee for an initial Oregon or out of state occupational therapy license by endorsement is \$160. The Board may also assess the actual cost of conducting a background check, including fingerprinting.</p> <p>(2) The two-year renewal fee issued for the occupational therapy license is \$240. The Board may also assess the actual cost to the Board of conducting workforce demographics surveys.</p> <p>(3) The fee for an initial Oregon or out of state occupational therapy assistant license is \$130. The Board may also assess the actual cost of conducting a background check, including fingerprinting.</p> <p>(4) The two-year renewal fee for the occupational therapy assistant license is \$160. The board may also assess the actual cost to the Board of conducting workforce demographics surveys.</p> <p>(5) The fee for a limited permit is \$25 and may not be renewed.</p> <p>(6) The fee for a temporary Oregon occupational therapist license for military spouses and domestic partners is \$99.</p>																								

	<p>(7) The fee for a temporary Oregon occupational therapy assistant license for military spouses and domestic partners is \$99.</p> <p>(8) The fee for an occupational therapist or occupational therapy assistant verification of Oregon licensure is \$25.</p> <p>(9) The fee for an occupational therapist and/or occupational therapy assistant electronic mailing list is \$100.</p> <p>https://secure.sos.state.or.us/oard/viewSingleRule.action;JSESSIONID_OARD=UYJ_3S55vmk-Hdy4GtV6HUYg9DKf7kuQUtKIYB3jOMxGl04txlSn!99228750?ruleVrsnRsn=301758</p>																										
South Dakota	<p>20:64:02:05. Fees. The following fees for licensure as an occupational therapist shall be charged:</p> <p>(1) An applicant applying for the initial license shall pay a fee of \$50;</p> <p>(2) An applicant applying for annual renewal of a license shall pay a fee of \$50;</p> <p>(3) An applicant applying for renewal of license after the license has lapsed shall pay an additional fee of \$25; and</p> <p>(4) An applicant applying for a limited permit shall pay a fee of \$25.</p> <p>https://sdlegislature.gov/Rules/Administrative/20:64:02:05</p>																										
Utah	<table><tr><td>Profession Type</td><td>Application Fee</td><td>Renewal Fee</td></tr><tr><td>Occupational Therapist</td><td>70.00</td><td>47.00</td></tr><tr><td>Occupational Therapy Assistant</td><td>70.00</td><td>47.00</td></tr><tr><td colspan="3">Occupational Therapist (OT)/Occupational Therapy Assistant (OTA) Compact</td></tr><tr><td>FBI Fingerprint file search</td><td colspan="2">\$10.00 per person-COMPACT ONLY</td></tr><tr><td>BCI Fingerprint file search</td><td colspan="2">\$20.00 per person-COMPACT ONLY</td></tr><tr><td>OT Compact license</td><td>80.00</td><td>47.00</td></tr><tr><td>OTA Compact license</td><td>80.00</td><td>47.00</td></tr></table> <p>https://dopl.utah.gov/wp-content/uploads/2022/11/fee-schedule.pdf</p>			Profession Type	Application Fee	Renewal Fee	Occupational Therapist	70.00	47.00	Occupational Therapy Assistant	70.00	47.00	Occupational Therapist (OT)/Occupational Therapy Assistant (OTA) Compact			FBI Fingerprint file search	\$10.00 per person-COMPACT ONLY		BCI Fingerprint file search	\$20.00 per person-COMPACT ONLY		OT Compact license	80.00	47.00	OTA Compact license	80.00	47.00
Profession Type	Application Fee	Renewal Fee																									
Occupational Therapist	70.00	47.00																									
Occupational Therapy Assistant	70.00	47.00																									
Occupational Therapist (OT)/Occupational Therapy Assistant (OTA) Compact																											
FBI Fingerprint file search	\$10.00 per person-COMPACT ONLY																										
BCI Fingerprint file search	\$20.00 per person-COMPACT ONLY																										
OT Compact license	80.00	47.00																									
OTA Compact license	80.00	47.00																									
Washington	<p>Occupational Therapist Fees:</p> <table><tr><td>Title of Fee</td><td>Fee</td></tr><tr><td>Original application</td><td></td></tr><tr><td>Application and initial license fee</td><td>\$150.00</td></tr><tr><td>HEAL-WA* surcharge</td><td>16.00</td></tr><tr><td>Limited permit fee</td><td>55.00</td></tr><tr><td>Active license renewal</td><td></td></tr></table>			Title of Fee	Fee	Original application		Application and initial license fee	\$150.00	HEAL-WA* surcharge	16.00	Limited permit fee	55.00	Active license renewal													
Title of Fee	Fee																										
Original application																											
Application and initial license fee	\$150.00																										
HEAL-WA* surcharge	16.00																										
Limited permit fee	55.00																										
Active license renewal																											

License renewal	125.00
Late renewal fee	65.00
HEAL-WA* surcharge (\$16.00 per year for two-year cycle)	32.00
Expired license reissuance	80.00
Inactive license renewal	
Inactive license	15.00
Expired license reissuance	15.00
HEAL-WA* surcharge (\$16.00 per year for two-year cycle)	32.00
Duplicate license	30.00
Verification of license	30.00
Occupational Therapy Assistants	
Title of Fee	Fee
Original application	
Application and initial license fee	\$150.00
HEAL-WA* surcharge	16.00
Limited permit fee	45.00
Active license renewal	
License renewal	105.00
Late renewal fee	55.00
Expired license reissuance	70.00
HEAL-WA* surcharge (\$16.00 per year for two-year cycle)	32.00
Inactive license renewal	
Inactive license	15.00
Expired inactive license reissuance	14.00
HEAL-WA* surcharge (\$16.00 per year for two-year cycle)	32.00
Duplicate license	30.00

	<p>Verification of license 30.00</p> <p>https://app.leg.wa.gov/wac/default.aspx?cite=246-847-990</p>
Wyoming	<p>Section 3. Fees. The Board shall charge the fees for the following services.</p> <ul style="list-style-type: none"> (a) Application Fee: <ul style="list-style-type: none"> (i) OT License: \$225.00 (ii) OTA License: \$175.00 (b) Temporary License Application Fee: <ul style="list-style-type: none"> (i) OT: \$50.00 (ii) OTA: \$25.00 (c) Limited License Application Fee: <ul style="list-style-type: none"> (i) OT: \$50.00 (ii) OTA: \$25.00 (d) License Renewal Fee: <ul style="list-style-type: none"> (i) OT: \$110.00 (ii) OTA: \$60.00 (e) Late Renewal Fee: \$100.00 (f) License Verification Fee: \$25.00 (g) Duplicate Certificate Fee: \$25.00 (h) Reinstatement Fee: \$150.00 (i) Re-Entry Fee: \$125.00 <p>https://rules.wyo.gov/Search.aspx?Agency=083</p>