

# ARIZONA STATE SENATE

## RESEARCH STAFF



**MICHAEL MADDEN**

LEGISLATIVE RESEARCH ANALYST  
HEALTH AND HUMAN SERVICES COMMITTEE  
Telephone: (602) 926-3171

TO: JOINT LEGISLATIVE HEALTH AND  
HUMAN SERVICES COMMITTEE OF  
REFERENCE

DATE: February 27, 2026

SUBJECT: Sunset Review of the Arizona Board of Occupational Therapy Examiners

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Attached is the final report of the sunset review of the Arizona Board of Occupational Therapy Examiners, which was conducted by the Joint Legislative Health and Human Services Committee of Reference.

This report has been distributed to the following individuals:

Governor of the State of Arizona  
The Honorable Katie Hobbs

President of the Senate  
Senator Warren Petersen

Speaker of the House of Representatives  
Representative Steve Montenegro

Senator Carine Werner, Co-Chair  
Senator Thomas "T.J." Shope  
Senator Hildy Angius  
Senator Rosanna Gabaldón  
Senator Sally Ann Gonzales  
Senator Kiana Sears  
Senator Janae Shamp

Legislative Members

Representative Selina Bliss, Co-Chair  
Representative Ralph Heap  
Representative Patty Contreras  
Representative Matt Gress  
Representative Alma Hernandez  
Representative Nick Kupper  
Representative Sarah Liguori  
Representative Chris Lopez  
Representative Elda Luna-Nájera  
Representative Christopher Mathis  
Representative Beverly Pingerelli  
Representative Jeff Weninger

CC: Senate Republican Staff  
Senate Democratic Staff  
Senate Research Staff  
Senate Resource Center  
House Republican Staff  
House Democratic Staff  
House Research Staff  
House Chief Clerk

Arizona Board of Occupational Therapy Examiners  
Arizona State Library, Archives and Public Records

# ARIZONA BOARD OF OCCUPATIONAL THERAPY EXAMINERS SUNSET REVIEW

## *Background*

Pursuant to [A.R.S. § 41-3026.09](#), the Joint Legislative Audit Committee assigned the sunset review of the Arizona Board of Occupational Therapy Examiners (Board) to the Senate Health and Human Services Committee of Reference and House Health and Human Services Committee of Reference.

The Board was established in 1989 to 1) license persons offering occupational services; 2) safeguard the public health, safety and welfare; 3) protect the public from incompetent and unauthorized persons; and 4) ensure the highest degree of professional conduct and care for persons in need of occupational therapy services. The Board oversees regulation and licensure of applicants, collects fees and is authorized to deny, revoke or suspend a license, investigate misconduct, conduct hearings and take disciplinary action as needed ([Arizona State Library](#); [A.R.S. § 32-3404](#)).

Board members are appointed by the Governor and the Board is comprised of five individuals: three members with at least three years of experience in occupational therapy and two public members to serve three-year term. The Board may employ and discharge an executive director and other officers and employees as it deems necessary and designate their duties (A.R.S. §§ [32-3402](#) and [32-3403](#)).

The Board terminates on July 1, 2026, unless legislation is enacted for its continuation ([A.R.S. § 41-3026.09](#)).

## *Sunset Review Procedure*

The Joint Legislative Health and Human Services Committee of Reference held a public meeting on Friday, January 30, 2026, to review the Auditor General's Performance Audit and Sunset Review Report, consider the Board's responses to the statutorily-outlined sunset factors and receive public testimony.

## *Committee of Reference Recommendations*

The Committee of Reference recommended that the Legislature continue the Board for four years until July 1, 2030, and that statutory changes be made to improve the Board's ability to efficiently and accurately perform their duties as prescribed by law.

## *Appendices*

- A. Meeting notice
- B. Committee minutes
- C. Committee materials
- D. Chairman's letter requesting Board response to the agency factors
- E. Board's response to the agency factors pursuant to [A.R.S. § 41-2954](#)

Interim agendas can be obtained via the Internet at <http://www.azleg.gov/Interim-Committees>

## ARIZONA STATE LEGISLATURE

### INTERIM MEETING NOTICE OPEN TO THE PUBLIC

#### SENATE HEALTH AND HUMAN SERVICES COR AND HOUSE HEALTH & HUMAN SERVICES JOINT COMMITTEE OF REFERENCE

**Date:** Friday, January 30, 2026

**Time:** 10:00 A.M.

**Place:** HHR 1

Members of the public may access a livestream of the meeting here:

<https://www.azleg.gov/videoplayer/?clientID=6361162879&eventID=2026011087>

#### AGENDA

1. Call to Order
2. Roll Call
3. Sunset Review of the Arizona State Board of Nursing
  - Presentation by the Arizona Office of the Auditor General
  - Response by the Arizona State Board of Nursing
  - Public Testimony
  - Discussion and Recommendation
4. Sunset Review of the Arizona State Board of Pharmacy
  - Presentation by the Arizona Office of the Auditor General
  - Response by the Arizona State Board of Pharmacy
  - Public Testimony
  - Discussion and Recommendation
5. Sunset Review of the Arizona Regulatory Board of Physician Assistants
  - Presentation by the Arizona Office of the Auditor General
  - Response by the Arizona Regulatory Board of Physician Assistants
  - Public Testimony
  - Discussion and Recommendation
6.  Sunset Review of the Arizona Board of Occupational Therapy Examiners
  - Presentation by the Arizona Office of the Auditor General
  - Response by the Arizona Board of Occupational Therapy Examiners
  - Public Testimony
  - Discussion and Recommendation

7. Sunset Review of the Arizona Department of Economic Security
  - Presentation by the Arizona Office of the Auditor General
  - Response by the Arizona Department of Economic Security
  - Public Testimony
  - Discussion and Recommendation
8. Adjournment

**Members:**

- |   |  |
|---|--|
| <ul style="list-style-type: none"> <li>→ Senator Carine Werner, Co-Chair</li> <li>→ Senator Hildy Angius</li> <li>→ Senator Eva Diaz</li> <li>→ <del>Senator Rosanna Cabaldón</del></li> <li>→ Senator Sally Ann Gonzales</li> <li>→ Senator Kevin Payne</li> <li>→ <del>Senator Kiana Sears</del></li> <li>→ <del>Senator Janae Shamp</del></li> <li>→ Senator Thomas "T.J." Shope</li> <li>→ Senator Priya Sundareshan</li> </ul> | <ul style="list-style-type: none"> <li>Representative Selina Bliss, Co-Chair</li> <li>Representative Ralph Heap</li> <li>Representative Patricia Contreras</li> <li>Representative Matt Gress</li> <li>Representative Alma Hernandez</li> <li>Representative Nick Kupper</li> <li>Representative Sarah Liguori</li> <li>Representative Chris Lopez</li> <li>Representative Elda Luna-Nájera</li> <li>Representative Christopher Mathis</li> <li>Representative Beverly Pingerelli</li> <li>Representative Jeff Weninger</li> </ul> |
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01/22/2026  
 01/29/2026  
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**People with disabilities may request reasonable accommodations such as interpreters, alternative formats, or assistance with physical accessibility. If you require accommodations, please contact the Chief Clerk's Office at (602) 926-3032 or through Arizona Relay Service 7-1-1.**

# ARIZONA STATE LEGISLATURE

## SENATE HEALTH AND HUMAN SERVICES AND HOUSE HEALTH & HUMAN SERVICES JOINT COMMITTEE OF REFERENCE

Minutes of the Meeting  
January 30, 2026  
10:00 A.M., HHR1

Members of the public may access a livestream of the meeting here:

<https://www.azleg.gov/videoplayer/?clientID=6361162879&eventID=2026011087>

### Members Present:

Senator Carine Werner, Co-Chair  
Senator Eva Diaz  
Senator Sally Ann Gonzales  
Senator Kevin Payne  
Senator Thomas "T.J." Shope  
Senator Priya Sundareshan

Representative Selina Bliss, Co-Chair  
Representative Ralph Heap  
Representative Patricia Contreras  
Representative Alma Hernandez  
Representative Nick Kupper  
Representative Sarah Liguori  
Representative Chris Lopez  
Representative Elda Luna-Nájera  
Representative Beverly Pingerelli  
Representative Jeff Weninger

### Members Excused:

Senator Hildy Angius

Representative Matt Gress  
Representative Christopher Mathis

### Staff:

Michael Madden, Senate Health and Human Services Research Analyst  
Samuel Rosenberg, Senate Health and Human Services Assistant Research Analyst  
Makenna Schouten, Senate Health and Human Services Research Intern  
Ahjahna Graham, House Health and Human Services Research Analyst  
Logan Kilbey, House Health and Human Services Research Intern

Co-Chair Werner called the meeting to order at 10:08 am and attendance was taken.

Senator Werner offered opening comments.

## **SUNSET REVIEW OF THE ARIZONA STATE BOARD OF PHARMACY**

### **Presentation by the Arizona Office of the Auditor General**

**Katie Grzybowski, Office of the Auditor General**, distributed and explained a PowerPoint presentation entitled "Arizona State Board of Pharmacy, Performance Audit and Sunset Review" (Attachment A).

### **Response by the Arizona State Board of Pharmacy**

**Kam Gandhi, Executive Director, Arizona State Board of Pharmacy**, distributed and explained a PowerPoint presentation entitled "Arizona State Board of Pharmacy" (Attachment B). Mr. Gandhi answered questions posed by the Committee.

### **Public Testimony**

**Frank Thorwald, Member (Public), Arizona State Board of Pharmacy**, testified in support of the continuation of the Arizona State Board of Pharmacy.

### **Discussion and Recommendation**

**Representative Bliss moved that the Joint House and Senate Health and Human Services Committee of Reference make a recommendation to continue the Arizona State Board of Pharmacy for 6 years, until July 1, 2032, and that statutory changes be made to improve the board's ability to efficiently and accurately perform their duties as prescribed by law. The motion CARRIED with a roll call vote of 13-0-6 (Attachment 1).**

## **SUNSET REVIEW OF THE ARIZONA STATE BOARD OF NURSING**

### **Presentation by the Arizona Office of the Auditor General**

**Jeff Gove, Office of the Auditor General**, distributed and explained a PowerPoint presentation entitled "Arizona State Board of Nursing, Performance Audit and Sunset Review" (Attachment C).

### **Response by the Arizona State Board of Nursing**

**Joey Ridenour, Executive Director, Arizona State Board of Nursing**, distributed and explained a PowerPoint presentation entitled "Arizona State Board of Nursing: Public Protection in a Period of Exponential Growth, January 2026" (Attachment D). Ms. Ridenour answered questions posed by the Committee.

## **Public Testimony**

**Kathryn Busby, Arizona Nurses Association**, testified as neutral on the continuation of the Arizona State Board of Nursing.

**Teresa Sanzio, representing self**, testified as neutral on the continuation of the Arizona State Board of Nursing and answered questions posed by the Committee.

## **Discussion and Recommendation**

**Representative Bliss moved that the Joint House and Senate Health and Human Services Committee of Reference make a recommendation to continue the Arizona State Board of Nursing for 4 years, until July 1, 2030, and that statutory changes be made to improve the board's ability to efficiently and accurately perform their duties as prescribed by law. The motion CARRIED with a roll call vote of 14-0-5 (Attachment 2).**

Senator Sundareshan and Representative Hernandez explained their votes.

## **SUNSET REVIEW OF THE ARIZONA BOARD OF OCCUPATIONAL THERAPY EXAMINERS**

### **Presentation by the Arizona Office of the Auditor General**

**Katie Grzybowski, Office of the Auditor General**, distributed and explained a PowerPoint presentation entitled "Arizona Board of Occupational Therapy Examiners, Performance Audit and Sunset Review" (Attachment E). Ms. Grzybowski answered questions posed by the Committee.

### **Response by the Arizona Board of Occupational Therapy Examiners**

**Shaina Ganatra, Executive Director, Arizona Board of Occupational Therapy Examiners**, offered comments and answered questions posed by the Committee.

## **Public Testimony**

No public testimony took place.

## **Discussion and Recommendation**

**Representative Bliss moved that the Joint House and Senate Health and Human Services Committee of Reference make a recommendation to continue the Arizona Board of Occupational Therapy Examiners for 4 years, until July 1, 2030, and that statutory changes be made to improve the board's ability to efficiently and accurately perform their duties as prescribed by law. The motion CARRIED with a roll call vote of 16-0-3 (Attachment 3).**

Senator Sundareshan explained her vote.

## **SUNSET REVIEW OF THE ARIZONA REGULATORY BOARD OF PHYSICIAN ASSISTANTS**

### **Presentation by the Arizona Office of the Auditor General**

**Katie Grzybowski, Office of the Auditor General**, distributed and explained a PowerPoint presentation entitled "Arizona Regulatory Board of Physician Assistants, Performance Audit and Sunset Review" (Attachment F). Ms. Grzybowski answered questions posed by the Committee.

### **Response by the Arizona Regulatory Board of Physician Assistants**

**Raquel Rivera, Executive Director, Arizona Regulatory Board of Physician Assistants**, distributed and explained a PowerPoint presentation entitled "Performance Audit and Sunset Review, January 2026" (Attachment G). Ms. Rivera answered questions posed by the Committee.

### **Public Testimony**

No public testimony took place.

### **Discussion and Recommendation**

**Representative Bliss moved that the Joint House and Senate Health and Human Services Committee of Reference make a recommendation to continue the Arizona Regulatory Board of Physician Assistants for 2 years, until July 1, 2028, and that statutory changes be made to improve the board's ability to efficiently and accurately perform their duties as prescribed by law. The motion CARRIED with a roll call vote of 12-4-3 (Attachment 4).**

Senators Payne, Sundareshan, Gonzales and Representatives Contreras, Hernandez, Luna-Nájera and Bliss explained their votes.

## **SUNSET REVIEW OF THE ARIZONA DEPARTMENT OF ECONOMIC SECURITY**

Senator Werner offered comments.

### **Presentation by the Arizona Office of the Auditor General**

**Timmy Sutton and Ashley Bjurstrom, Office of the Auditor General**, distributed and explained a PowerPoint presentation entitled "Arizona Department of Economic Security, Performance Audits and Sunset Review" (Attachment H). Mr. Sutton and Ms. Bjurstrom answered questions posed by the Committee.

### **Response by the Arizona Department of Economic Security**

**Michael Wisehart, Director, Arizona Department of Economic Security**, distributed and explained a PowerPoint presentation entitled "Committee of Reference, January 30, 2026" (Attachment I).

## **Public Testimony**

No public testimony took place.

## **Discussion and Recommendation**

**Representative Bliss moved that the Joint House and Senate Health and Human Services Committee of Reference make a recommendation to continue the Arizona Department of Economic Security for 4 years, until July 1, 2030, and that statutory changes be made to improve the board's ability to efficiently and accurately perform their duties as prescribed by law. The motion CARRIED with a roll call vote of 16-0-3 (Attachment 5).**

Senator Werner explained her vote.

Attached is a list noting the individuals who registered their positions on the agenda items (Attachment J).

Attached are the forms noting the individuals who submitted a Speaker slip on the agenda items (Attachment K).

There being no further business, the meeting was adjourned at 12:31 p.m.

Respectfully submitted,

Jeff Christophersen  
Committee Secretary

(Audio recordings and attachments are on file in the Secretary of the Senate's Office/Resource Center, Room 115. Audio archives are available at <http://www.azleg.gov>)



# Arizona Board of Occupational Therapy Examiners

## Performance Audit and Sunset Review

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January 30, 2026

Katie Grzybowski



# PRESENTATION OVERVIEW

- ▶ Key context
- ▶ Board's positive performance
- ▶ Problems identified
- ▶ Why the problems matter
- ▶ What led to the problems
- ▶ Key recommendations

# KEY CONTEXT

- ▶ Board established in 1989 to regulate individuals who provide occupational therapy services
- ▶ Board consists of 5 Governor-appointed members
- ▶ Shaina Ganatra serves as executive director
- ▶ We last reviewed Board in 1996
- ▶ Board conducted self-review in 2017

# KEY CONTEXT

## Board's key responsibilities

- ▶ Issuing licenses and permits to qualified occupational therapists and occupational therapy assistants
- ▶ Investigating complaints against licensees
- ▶ Providing information to the public about licensees

# POSITIVE PERFORMANCE

## **Board developed processes and/or took steps to fulfill key responsibilities for 2 areas reviewed**

- ▶ Issued initial licenses within 120 days for all 535 licensing applications it received in calendar year 2024, as required by Board rule
- ▶ Established a process to review licensee compliance with continuing education requirements

# PROBLEM IDENTIFIED

## **Board lacked evidence it obtained and/or verified criminal history of licensees**

- ▶ Lacked evidence it obtained fingerprint clearance card or criminal history records
  - ▶ 7 of 20 initial license applicants
  - ▶ 2 of 10 renewal applicants we reviewed
- ▶ Lacked documentation it verified the validity of information
  - ▶ 6 of 13 initial licenses
  - ▶ 2 of 8 renewal licensees

# WHY THE PROBLEM MATTERS

## Issuing and renewing licenses without verifying criminal history puts patient safety at risk

- ▶ Occupational therapists often work with vulnerable individuals with varying levels of supervision
- ▶ Could allow individuals with criminal histories access to vulnerable individuals in settings with little to no supervision
- ▶ Verification is imperative for ensuring that applicants have not committed any precluding offenses

# WHAT LED TO THE PROBLEM

## Multiple factors contributed to this issue

- ▶ Board transitioned licensing systems which impacted the Board's record keeping
- ▶ Board did not have written policies, procedures, or guidance to sufficiently document some criminal history records checks
- ▶ Board staff did not always follow the policies and procedures to verify the validity of fingerprint clearance cards it received

# PROBLEM IDENTIFIED

- ▶ Board did not deny renewal application for licensee who waited 188 days to report he was charged with child sex trafficking, luring a minor for sex, and attempted sexual contact with a minor
- ▶ Board waited 3 months before opening an investigation and offering licensee a consent agreement to temporarily suspend his license
- ▶ License was not suspended until 187 days after Board received information regarding licensee's unprofessional conduct

# RECOMMENDATIONS OVERVIEW

## 5 recommendations to the Board, including:

- ▶ Issue initial and renewal licenses only to applicants who possess a valid fingerprint clearance card
- ▶ Revise and implement procedures to ensure it promptly investigates and takes appropriate enforcement action, including denying renewal applications, when licensees fail to timely disclose serious criminal charges and other potential unprofessional conduct

# OTHER ISSUES IDENTIFIED

## Examples of deficiencies identified in the sunset review and 27 additional recommendations to the Board

- ▶ Did not resolve some complaints in a timely manner, which could affect patient safety and may cause undue burden for licensees
- ▶ Various errors related to charging and setting fees
- ▶ Other issues with public records law, providing public information on licensees, and conflict-of-interest processes



# Arizona Board of Occupational Therapy Examiners

## Performance Audit and Sunset Review

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January 30, 2026

Katie Grzybowski





# Arizona State Legislature

1700 West Washington

Phoenix, Arizona 85007

June 10, 2025

Executive Director Shaina Ganatra  
Arizona Board of Occupational Therapy Examiners  
1740 W. Adams St, Suite 3407  
Phoenix, AZ, 85007

Dear Executive Director Ganatra:

The sunset review process prescribed in Title 41, Chapter 27, Arizona Revised Statutes, provides a system for the Legislature to evaluate the need to continue the existence of state agencies. During the sunset review process, an agency is reviewed by legislative committees of reference (CORs). On completion of the sunset review, the CORs recommend to continue, revise, consolidate or terminate the agency.

The Joint Legislative Audit Committee (JLAC) has assigned the sunset review of the Arizona Board of Occupational Therapy Examiners (Board) to CORs comprised of members of the Senate Health and Human Services Committee and the House of Representatives Health and Human Services Committee. JLAC has directed the Auditor General to conduct a performance audit of the Board.

Pursuant to A.R.S. § 41-2954, the COR is required to consider certain sunset factors in deciding whether to recommend continuance, modification or termination of an agency. In addition to the sunset factors, which are addressed in the Auditor General performance audit, please provide your agency's written response to the required factors as listed below:

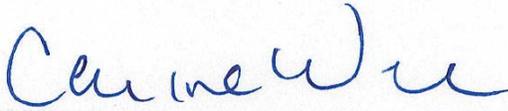
1. The extent to which the agency potentially creates unexpected negative consequences that may require additional review by the COR, including increasing the price of goods, affecting the availability of services, limiting the abilities of individuals and businesses to operate efficiently and increasing the cost of government.
2. The extent to which the agency has addressed deficiencies in its enabling statutes.
3. The extent to which the agency has determined whether the Attorney General or any other agency in Arizona has the authority to prosecute or initiate actions.
4. The consequences of eliminating the agency or consolidating it with another agency.

Your response should be received by September 1, so that we may proceed with the sunset review and schedule the required public hearing. Please submit the requested information to:

Michael Madden  
Arizona State Senate  
1700 West Washington  
Phoenix, Arizona 85007

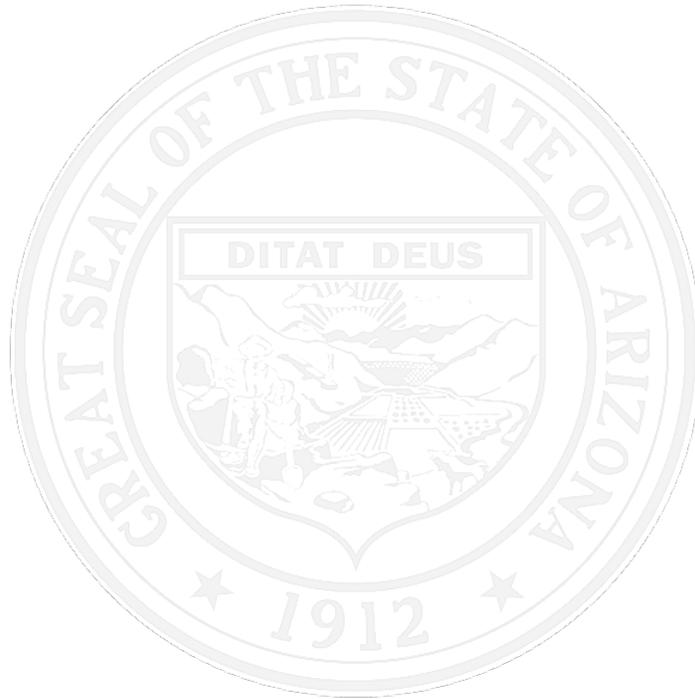
Thank you for your time and cooperation. If you have any questions, please feel free to contact me at (602) 926-3673 or Michael Madden, the Senate Health and Human Services Committee Research Analyst, at (602) 926-3072.

Sincerely,

A handwritten signature in blue ink that reads "Carine Werner". The signature is fluid and cursive, with the first name "Carine" and last name "Werner" clearly distinguishable.

Senator Carine Werner  
Senate Health and Human Services Committee, Chair

cc: Representative Selina Bliss, House Health and Human Services Committee, Chair  
Ahjahna Graham, House Health and Human Services Committee, Analyst





**ARIZONA BOARD OF OCCUPATIONAL THERAPY EXAMINERS**  
1740 West Adams Street, Suite 3006, Phoenix, Arizona 85007  
www.ot.az.gov  
(602) 589-8353 Fax: (602) 589-8354

September 25, 2025

Senator Carine Werner, Chair  
Senate Health and Human Services Committee  
1700 West Washington  
Phoenix, Arizona 85007

*RE: Response to Sunset Factors pursuant to A.R.S. § 41-2954*

Honorable Senator Werner,

In accordance with the provisions of A.R.S. § 41-2954 and in response to your letter dated June 10, 2025, I offer the following responses on behalf of the Arizona Board of Occupational Therapy Examiners:

**1. The extent to which the agency potentially creates unexpected negative consequences that may require additional review by the COR, including increasing the price of goods, affecting the availability of services, limiting the abilities of individuals and businesses to operate efficiently and increasing the cost of government.**

The Arizona Board of Occupational Therapy Examiners (“Board”) does not introduce any unforeseen negative consequences requiring additional review by the Committee of Reference (COR). The Board's primary functions include licensing and regulating occupational therapists and occupational therapy assistants within the state.

As a now 85% self-funded model, the Board continues to operate through a cost-effective approach that has not increased the cost of government. However, for the first time in several years, a fee adjustment is anticipated in accordance with statute. This potential adjustment is due to a recent fund transfer, the newly enacted 85/15 revenue sharing structure, and poor economic conditions.

The Board does not influence the price of goods or the availability of services in the community, as these aspects are largely managed by market competition. The Board also does not hinder the efficient operation of individuals and businesses.

While concerns may exist regarding potential limitations on service availability due to strict licensure requirements, the Board actively addresses these. It provides multiple pathways to licensure, which helps mitigate economic restrictions. Furthermore, the Board's efforts to streamline processes and offer reciprocity through the Occupational Therapy Licensure Compact (OT Compact) also reduce barriers to practice for qualified professionals.

**2. The extent to which the agency has addressed deficiencies in its enabling statutes.**

The Arizona Board of Occupational Therapy Examiners has proactively addressed and is currently addressing deficiencies in its enabling statutes through continuous updates. The executive director conducts an annual review to ensure the statutes remain current and effective for regulating occupational therapists and occupational therapy assistants in Arizona. The agency also collaborates closely with the Attorney General's Office to resolve any statutory questions or issues that may arise. Should a potential deficiency be identified, the executive director consults with board members and the assigned Assistant Attorney General to determine if legislative action is necessary.

Since the last audit, the Board has enhanced its complaint resolution process, leading to more efficient Board meetings and improved complaint tracking through a new comprehensive database. Additionally, the Board has implemented recommendations from the Auditor General's report, thereby addressing operational gaps and inefficiencies.

The Board is continually looking for ways to improve, which often includes statutory and rule changes. For example, the Board recently became aware of enabling statutes that were deficient because they lacked corresponding rules required by the statutes. The Board is currently working with a rulewriter and is addressing these deficiencies by opening rulemaking packages to correct them.

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**3. The extent to which the agency has determined whether the Attorney General or any other agency in Arizona has the authority to prosecute or initiate actions.**

The Board contracts with the Attorney General's Office for legal services provided by an assigned Assistant Attorney General ("AAG"). The AAG attends all Board and Committee meetings and provides legal advice to the Board as needed. In addition, the AAG prosecutes cases on the Board's behalf.

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**4. The consequences of eliminating the agency or consolidating it with another agency.**

Eliminating the Board would significantly endanger the public health, safety, and welfare, and would place the public at risk of harm from incompetent and unethical practitioners. No alternative agency is currently positioned to assume the responsibility of evaluating the qualifications for licensing skilled practitioners, nor is there an alternative agency prepared to investigate and enforce the standards of practice for which the Board is currently responsible.

The practice of occupational therapy involves a variety of hands-on procedures and requires specialized knowledge to safely implement interventions for vulnerable populations with complex conditions. Every year, the Board investigates numerous complaints regarding substandard care, unlicensed practice, and unprofessional conduct. Without adequate regulatory oversight and an avenue for the public to report infractions, practitioners who violate the Board's statutes and rules would be allowed to continue inflicting harm on the public. Furthermore, termination would eliminate the ability for clients and the public to inquire about the profession, obtain information about individual practitioners, and seek recourse.

Regarding consolidation, while the Board currently demonstrates efficiency by sharing an executive director with another Board, a full consolidation with another agency could lead to increased fees for licensees, as administrative costs rise to manage a larger, more complex entity. It would also likely result in longer investigation times and delays in case resolutions, as resources are spread thinner across multiple license types. This would dilute the specialized expertise crucial for enforcing standards and protecting the public in the distinct field of occupational therapy. A full consolidation could lead to increased fees, longer investigation times, and weaker oversight.

Overall, there is no clear financial or practical benefit to such a consolidation, and it would ultimately weaken the effectiveness of professional regulation in Arizona. The Board recommends against both elimination and consolidation.

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The Arizona Board of Occupational Therapy Examiners ("Board") appreciates this opportunity to address the important questions raised by the Committee of Reference. Since its establishment, the Board has collaborated closely with occupational therapists and occupational therapy assistants to ensure the highest quality healthcare for Arizona's residents. We are eager to continue this valuable work with the community.

If you have any questions about this submission or the Board, please feel free to contact me at [shaina.ganatra@otboard.az.gov](mailto:shaina.ganatra@otboard.az.gov), or call me at (602) 589-8353.

Sincerely,



Shaina Ganatra  
Executive Director  
Arizona Board of Occupational Therapy Examiners