



Senate Fiscal Agency  
P.O. Box 30036  
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## BILL ANALYSIS



Telephone: (517) 373-5383  
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House Bills 4103 and 4104 (Substitute S-1 as reported)  
Sponsor: Representative Julie Rogers (H.B. 4103)  
Representative Douglas Wozniak (H.B. 4104)  
House Committee: Health Policy  
Senate Committee: Health Policy

**CONTENT**

The bills would enact an occupational therapy state licensure compact, or an agreement between states to establish uniform standards for licensure and practice of occupational therapy. They would facilitate the interstate practice of occupational therapy by establishing licensing and sanctioning standards, such as by allowing any compact member state to investigate violations of the practice of occupational therapy in any other member state in which an occupational therapist or occupational therapist assistant held a license or Compact privilege. Member states would have to establish the Occupational Therapy Compact Commission to build and use a coordinated database and reporting system containing licensure, adverse action, and investigative information on all licensed individuals in member states. Generally, a member state would have to require its executive, legislative, and judicial branches of state government to enforce the Compact.

The bills are tie-barred, and each bill would take effect 18 months after its enactment.

Proposed MCL 333.16188 (H.B. 4103)  
MCL 333.16345 et al. (H.B. 4104)

**BRIEF RATIONALE**

The bills would see Michigan join 31 other states in adopting the Occupational Therapy Licensure Compact, in which occupational therapists from all 31 states could work in any of the other states with the same licensure. These bills would increase access to occupational therapists from outside the state by removing redundant licensure processes that serve as barriers to occupational therapists who want to move states. According to testimony, better recruitment and retention of occupational therapists could result from the bills, which could lead to better health outcomes in Michigan communities.

Legislative Analyst: Alex Krabill

**FISCAL IMPACT**

The bills would have an indeterminate fiscal impact on State government and no fiscal impact on local units of government. The bills would require the Department of Licensing and Regulatory Affairs to take on significant responsibilities; however, existing appropriations and staff likely would be sufficient to cover the cost and workload associated with the Compact. As a participant in the Compact, the State could incur legal costs if it defaulted on Compact terms or was terminated from the Compact. The Attorney General also could incur additional enforcement costs. The Commission also could levy and collect an annual assessment on the State to cover its own operation costs. The total assessment is currently unknown.

Date Completed: 9-10-25

Fiscal Analyst: Nathan Leaman

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Bill Analysis @ [www.senate.michigan.gov/sfa](http://www.senate.michigan.gov/sfa)

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