

THIRD READING

Bill No: AB 2773
Author: Committee on Business and Professions
Amended: 4/22/26 in Assembly
Vote: 21

SENATE BUS., PROF. & ECON. DEV. COMMITTEE: 11-0, 6/29/26
AYES: Wahab, Choi, Archuleta, Arreguín, Caballero, Grayson, Menjivar, Niello,
Smallwood-Cuevas, Strickland, Umberg

SENATE APPROPRIATIONS COMMITTEE: 7-0, 8/13/26
AYES: Cervantes, Seyarto, Cabaldon, Dahle, Grayson, Richardson, Wahab

ASSEMBLY FLOOR: 76-1, 5/26/26 - See last page for vote

SUBJECT: California Board of Occupational Therapy: licensing: fees

SOURCE: Author

DIGEST: This bill 1) extends the sunset date of the California Board of Occupational Therapy (CBOT or Board) to January 1, 2031; and 2) makes statutory improvements and policy reforms in response to issues raised during the Board's sunset review oversight.

ANALYSIS:

Existing law:

- 1) Provides for the regulation of Occupational Therapy under the Occupational Therapy Practice Act (Act), which outlines the licensure requirements, scope of practice, and responsibilities of individuals practicing occupational therapy in the state. (Business and Professions Code (BPC) §§ 2570 *et seq.*)
- 2) Establishes CBOT within the Department of Consumer Affairs (DCA), to enforce the Act and regulate occupational therapists (OTs) and occupational therapy assistants (OTAs) until January 1, 2026. (BPC § 2570.19)

- 3) Requires the Board to meet and hold at least one regular meeting annually in the Cities of Sacramento, Los Angeles, and San Francisco. (BPC § 2570.19(g))
- 4) Authorizes the following persons to practice occupational therapy:
 - a) Any person licensed or otherwise recognized in this state by any other law or regulation when that person is engaged in the profession or occupation for which he or she is licensed or otherwise recognized;
 - b) Any person pursuing a supervised course of study leading to a degree or certificate in occupational therapy at an accredited educational program, if the person is designated by a title that clearly indicates his or her status as a student or trainee; and
 - c) Any person fulfilling the supervised fieldwork experience requirements of their educational program. (BPC § 2570.4)
- 5) Requires that applicants for licensure as an OT or OTA meet specified requirements, including that the applicant has successfully completed:
 - a) The academic requirements of an educational program for OTs or OTAs that is approved by the CBOT and accredited by the American Occupational Therapy Association's Accreditation Council for Occupational Therapy Education (ACOTE), or as otherwise specified, and
 - b) A period of supervised fieldwork experience approved by the CBOT and arranged by a recognized educational institution where he or she met their academic requirements. (BPC § 2570.6)
- 6) Requires the CBOT to establish the following fees:
 - a) A licensing and renewal fee not to exceed \$150 a year;
 - b) An application fee not to exceed \$50;
 - c) A limited permit fee;
 - d) A fee to collect fingerprints for criminal history record checks, not to exceed the amount charged by the agency providing the record check; and
 - e) A fee to query the National Practitioner Data Bank for applicants for licensure and renewal of licensure, not to exceed the amount charged per query. (BPC § 2570.16)

This bill:

- 1) Requires that the limited permit fee not exceed \$125.
- 2) Establishes the following fees: a) a pocket card fee not to exceed \$50; b) a duplicate wall certificate fee not to exceed \$50; and c) a fee for a letter of good standing, endorsements, or verification of licensure not to exceed \$50.
- 3) Specifies that supervised fieldwork requirements for licensure must be arranged by an ACOTE-accredited institution.
- 4) Authorizes any person completing a supervised entry-level doctoral capstone experience to practice occupational therapy, so long the practice constitutes a part of the experience necessary to meet their doctoral requirements.
- 5) Requires that applicants for licensure successfully complete a supervised entry-level doctoral capstone experience arranged by an ACOTE-accredited educational institution where the applicant has met their academic requirements.
- 6) On or before July 1, 2027, requires applicants and licensees to provide a current email address to the CBOT if they have one, and to notify the CBOT of changes to their email address within 30 days; requires CBOT to remind licensees of their obligation to report their email address with each renewal.
- 7) Requires the Board to meet at least three times a year, meeting at least once each calendar year in northern California and once in southern California.

Background

Oversight Hearings and Sunset Review of Licensing Boards and Programs. In March 2026, the Senate Business, Professions and Economic Development Committee and the Assembly Committee on Business and Professions (Committees) began their comprehensive sunset review oversight of ten regulatory entities, including CBOT. The Committees conducted three oversight hearings. This bill and the accompanying sunset bills are intended to implement legislative changes as recommended by staff of the Committees, and which are reflected in the Background Papers prepared by Committee staff for each agency and program reviewed this year.

Background on CBOT. The Board protects the health and safety of California consumers by licensing and regulating Occupational Therapists and Occupational Therapist Assistants. Occupational therapy is the use of goal-directed activities (or

“occupations”) to support client participation, performance, and function at home, school, the workplace, and in other settings. Occupational therapy services are provided for habilitation, rehabilitation, and the promotion of health and wellness for clients with disability- and non-disability-related needs or to those who have, or are at risk of developing, health conditions that limit activity or cause participation restrictions. Common situations include helping children with disabilities to participate fully in school and develop social skills, helping people recovering from injury to regain function through retraining or adaptations, and providing support for older adults experiencing physical and cognitive changes.

While an OT performs comprehensive assessments and establishes the therapeutic plan of care, services may then be delivered either directly by the OT or with the assistance of an OTA under appropriate supervision. The OT retains overall responsibility for clinical decision-making, modification of treatment plans, and ensuring that services are delivered in a manner consistent with law and professional standards.

The Board ensures applicants qualify for licensure by successfully completing specified academic requirements and supervised fieldwork experience relevant to the license to which they are applying, as well as passing the applicable entry-level certification examination. There are approximately 18,000 OT licensees and 4,400 OTA licensees.

FISCAL EFFECT: Appropriation: No Fiscal Com.: Yes Local: No

The 2026-27 Budget provides approximately \$3.241 million (Occupational Therapy Fund) and 16.7 positions to support the continued operation of the Board’s licensing and enforcement activities. The Board estimates annual revenue increases of up to \$23,000. However, because it has not yet adopted these fee increases in regulation, no revenue changes will occur until formal regulatory action is taken. Other costs related to reviewing the additional pathways for satisfying fieldwork requirements are anticipated to be absorbable. The Office of Information Services anticipates minor and absorbable costs to make BreEZe system updates.

SUPPORT: (Verified 8/14/26)

California Board of Occupational Therapy
Occupational Therapy Association of California

OPPOSITION: (Verified 8/14/26)

None received

ARGUMENTS IN SUPPORT: The California Board of Occupational Therapy writes, “AB 2773 extends the Board’s sunset date to January 1, 2031, allowing continued oversight of occupational therapy licensees and continued protection of California consumers. The bill also makes important updates to the Occupational Therapy Practice Act to strengthen public protection, ensure educational quality, and improve administrative efficiency. Collectively, these changes will help CBOT continue to uphold high standards in occupational therapy education and practice, support applicants and licensees, and protect consumers through more efficient regulatory processes.”

The Occupational Therapy Association of California writes, “OTAC supports CBOT’s oversight of the occupational therapy profession and its mission to protect consumers. In addition to the extension of CBOT’s sunset, OTAC is supportive of provisions in AB 2773 that impose limits on fees the Board may impose on practitioners for licensing documents. In capping the limited permit fee, this bill ensures that entry-level practitioners are not subject to unpredictable or excessive costs as they transition into the workforce. Establishing standardized fees for items such as pocket licenses, duplicate wall certificates, and letters of good standing further enhance transparency and consistency, allowing licensees to better anticipate and manage professional expenses. OTAC is also supportive of provisions within AB 2773 which require CBOT to collect licensee email addresses. This provision serves as a common-sense modernization that will improve communication, streamline administrative processes, and ensure timely dissemination of important regulatory updates. Finally, formally recognizing the doctoral capstone experience as part of an entry-level doctoral degree acknowledges the evolving standards of occupational therapy education and affirms the value of supervised clinical practice embedded within these programs.”

ASSEMBLY FLOOR: 76-1, 5/26/26

AYES: Addis, Aguiar-Curry, Ahrens, Alanis, Alvarez, Arambula, Ávila Fariás, Bains, Bauer-Kahan, Bennett, Berman, Boerner, Bonta, Bryan, Calderon, Caloza, Carrillo, Castillo, Chen, Connolly, Davies, Dixon, Elhawary, Ellis, Flora, Fong, Gabriel, Gallagher, Garcia, Gipson, Jeff Gonzalez, Mark González, Hadwick, Haney, Harabedian, Hart, Hoover, Irwin, Jackson, Johnson, Kalra, Krell, Lackey, Lee, Lowenthal, Macedo, McKinnor, Nguyen, Ortega, Pacheco, Papan, Patel, Patterson, Pellerin, Petrie-Norris, Quirk-Silva, Ramos, Ransom, Michelle Rodriguez, Rogers, Blanca Rubio, Sanchez, Schiavo, Schultz, Sharp-

Collins, Solache, Soria, Stefani, Tangipa, Valencia, Wallis, Ward, Wicks, Wilson,
Zbur, Rivas

NOES: DeMaio

NO VOTE RECORDED: Muratsuchi, Celeste Rodriguez, Ta

Prepared by: Yeaphana La Marr / B., P. & E.D. /916-651-4104
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