

November 17, 2025

New Mexico Board of Examiners for Occupational Therapy
P.O. Box 25101
Santa Fe, NM 87504

Re: NBCOT Comments on Proposed Rule Changes to 16.15.2.8, 16.15.2.9, and 16.15.4

Dear Chair Porte and Members of the New Mexico Board of Examiners for Occupational Therapy:

The National Board for Certification in Occupational Therapy, Inc. (NBCOT®) appreciates the opportunity to provide comments on the Board's proposed rule revisions. NBCOT's mission is to serve the public interest through the validation of essential competencies for effective and safe occupational therapy practice. We greatly value the Board's partnership and our shared missions of protecting the public. In support of the Board's efforts to strengthen the regulatory framework for occupational therapy practice in New Mexico, NBCOT respectfully submits the following comments:

1. Appreciation for Retaining the NBCOT Examination Requirement (16.15.2.8)

NBCOT would like to express sincere gratitude for retaining the NBCOT examination as the required competency assessment for initial licensure. Maintaining this requirement ensures that all new occupational therapists and occupational therapy assistants demonstrate entry-level competence using a nationally recognized, psychometrically sound examination aligned with current practice standards.

2. Concerns Regarding Verification of NBCOT Certification (16.15.2.9)

NBCOT has some concerns regarding proposed revisions to 16.15.2.9, which remove the requirement for applicants to hold current, active certification in good standing. Some practitioners may allow their certification to lapse or may no longer be in good standing due to disciplinary actions. While NBCOT notifies the Board of all sanctions imposed on certificants in New Mexico, the absence of an active certification requirement may weaken important safeguards that protect the public. Retaining the expectation that applicants be actively certified and in good standing helps ensure that individuals have met ongoing professional conduct and competency standards.

3. Support for Revisions to 16.15.4 and Acceptance of the NBCOT Navigator

NBCOT supports the proposed changes to section 16.15.4 and appreciates the continued acceptance of NBCOT's Navigator® tools for licensure renewal. Navigator

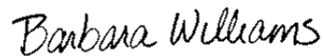
provides evidence-based, interactive assessments and activities that support continued competency and public protection. For reference, the Board may consult [NBCOT's Certification Renewal Activities Chart](#), which outlines all qualifying continuing competency options.

We appreciate the Board's careful attention to these matters and remain committed to supporting New Mexico in fostering high-quality occupational therapy practice and public protection. Please contact us by phone (301-990-7979) or email (am@nbcot.org, bwilliams@nbcot.org) with any questions or if additional information would be helpful.

Sincerely,



Angela Macauley
President and CEO
NBCOT



Barbara Williams
Vice President, External & Regulatory Affairs
NBCOT