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OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE

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Vermont General Assembly
House Committee on Health Care
115 State Street
Montpelier, VT 05633-5301

Representative Lori Houghton, Chair
Representative Francis McFaun, Vice Chair

Remarks of
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Testimony: H 247, An act relative to Vermont's adoption of the Occupational Therapy Licensure Compact

Representative Houghton, Representative McFaun and honorable members of the House Committee on Health Care; the Department of Defense is thankful for the opportunity to support policy changes proposed in H 247, An act relative to Vermont's adoption of the Occupational Therapy Licensure Compact (OTLC), which addresses licensing issues affecting our service members and their families. The purpose of the OTLC is to facilitate the interstate practice of occupational therapy with the goal of improving public access to services, while preserving the regulatory authority of states to protect public health and safety through the current system of state licensure.

My name is Melissa Willette. I am the New England Region Liaison at the Defense-State Liaison Office, operating under the direction of the Under Secretary of Defense for Personnel and Readiness.

We represent the Department and establish relationships with state leaders across the country who are concerned for troops and their families' welfare by harmonizing state and federal law and regulation on policy problems of national significance. These are identified by the Office of the Secretary of Defense, the Military Departments, and the National Guard Bureau as areas where states can play a crucial role.

Licensure issues for both our transitioning military members and their spouses have been a priority for the Department for several years. The Occupational Therapy Licensure Interstate Compact seeks to eliminate barriers to interstate professional occupational therapy practice, improve patient access to professional services, enhance public protection through a shared interstate licensure data system, while simultaneously supporting the spouses of relocating active-duty military personnel.

Of additional benefit is the compact's utilization of a mutual recognition model of interstate practice, which enhances opportunities of portable careers for military spouses by providing consistent rules which allow licensed members to work in other states through "privilege to practice policies", or more easily transfer their license to a new state.

The Secretaries of the Military Departments have made the importance of military spouse licensure explicitly clear as they consider the availability of license reciprocity when evaluating future basing or mission alternatives. In 2018, the secretaries of the Army, Navy and Air force issued a policy memorandum to the National Governor's Association noting they will consider the quality of schools near bases and whether reciprocity of professional licenses is available for military families when evaluating future basing or mission alternatives.¹ This consideration was codified by Congress as a requirement in the 2020 National Defense Authorization Act.²

To address license portability for military spouses, states have turned to occupational licensure interstate compacts, which streamline relicensing between member states of a compact for all practitioners in an occupation and provide specific support for military spouses of relocating active-duty personnel through provisions recognizing unique requirements of military life.

Professional licensure has been an enduring problem for military spouses. Obtaining a license in a new state can be both time consuming and expensive, and military spouses often cannot adequately anticipate how to prepare for licensure in a new state due to the unpredictable nature of military moves. The short duration of military assignments, coupled with lengthy relicensing processes, can discourage military spouses from seeking relicensure, causing them to quit an occupation or causing military families to leave the military.

Military spouses are a cross-section of the American population, although a greater percentage of them are in licensed occupations than their civilian counterparts,³ and they are significantly more mobile. States have committed to using interstate compacts, which establish common understanding of competency and its measurement within the occupation, to resolve the interstate issue of license portability.

¹ United States Department of Defense, "Service secretaries say quality of schools, reciprocity of licenses should be considered in future basing decisions." February 23, 2018.

<https://www.defense.gov/News/Releases/Release/Article/1449706/service-secretaries-say-quality-of-schools-reciprocity-of-licenses-should-be-co/>

² Notably, §2883(h) requires the Department and each of the military services to produce annual basing decision scorecards at the state and installation level considering military family readiness issues, including interstate portability of licensure credentials.

The secretaries must consider "*whether the State in which an installation subject to a basing decision is or will be located ... has entered into reciprocity agreements to recognize and accept professional and occupational licensure and certification credentials granted by or in other States or allows for the transfer of such licenses and certifications granted by or in other States.*" (*Id.* (b))

³ 34 percent of active duty spouses self-identified as needing a State issued license to work (2017 Survey of Active Duty (Active Component) Spouses, Tabulations of Responses; Office of People Analytics Report No. 2018-006, May 2018), compared to 30 percent of the civilian population (The Hamilton Project, Brookings Institute, https://www.hamiltonproject.org/charts/percent_of_occupations_requiring_a_license_by_state)

Compacts can provide seamless reciprocity for military spouses in an occupation. Barriers to the transfer and acceptance of certifications and licenses that occur when state rules differ can have a dramatic and negative effect on the financial well-being of military families.

Frequent moves and cumbersome licensing and certification requirements limit career options for military spouses. Removing these barriers, creating reciprocity in licensing requirements, and facilitating placement opportunities can help a military family's financial stability, speed the assimilation of the family into its new location, and create a desirable new employee pool for a state.

The Department of Defense is grateful for the efforts Vermont has historically made to support our uniformed service members and their families. We appreciate the opportunity to support the passage of the policies reflected in H 247 and are especially grateful to Representative Stone for introducing the legislation.

Thank you for your time and attention. I stand ready to answer whatever questions you may have and can be reached at melissa.j.willette3.civ@mail.mil or 703-623-2035.

Respectfully,

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