



January 10, 2025

Re: Public Comment Notice for Occupational Therapy Compact Commission (OTCC) Member State Implementation Rules

The OTCC welcomes public input on the proposed Member State Implementation Rules, which are designed to define terms pursuant to Section 3.A-F of the Occupational Therapy Compact. This 30-day public comment period provides an opportunity for interested individuals and organizations to express their opinions, concerns, and suggestions on the proposed Member State Implementation Rules. Your feedback is valuable to us and will be considered in the decision-making process.

I. Purpose:

The purpose of this public comment notice is to encourage and facilitate public input on the proposed Member State Implementation Rules. We are committed to transparency, accountability, and inclusivity in our decision-making process, and your comments will assist us in refining and finalizing this Rule.

II. Comment Period:

The public comment period for the proposed Member State Implementation Rule will be open for 30 days, starting from Monday, January 13, 2025, and closing on Friday, February 14, 2025. *All comments must be received by 5:00p.m. EST on Friday, February 14, 2025.*

III. How to Submit Comments:

Email your comments to amanda@asmii.net. Please indicate “Public Comment for Member State Implementation Rules” in the subject line of your email. All comments received will be considered part of the public record and may be subject to disclosure under applicable laws.

IV. Public Hearing:

A public hearing on the proposed Member State Implementation Rules will be held on Wednesday, April 16, 2025, virtually, via Zoom.

V. Contact Information:

If you have any questions or require further information regarding the proposed Member State Implementation Rules or this public comment process, please contact the OTCC Executive Director at Amanda@asmii.net. We look forward to receiving your comments and thank you for your participation in shaping the future of the Occupational Therapy Compact Commission.

Kind regards,

Lesly Wilson-James, Ph.D

Dr. Lesly Wilson James, Chair
Occupational Therapy Compact Commission

1 **Occupational Therapy Compact (OT Compact)**

2 **OT Compact Commission**

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4 **Title of Rule:** Member State Implementation

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6 **Drafted:** October 15, 2024

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8 **OTCC meeting at which Rule will be discussed and voted on:** April 16, 2025

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10 **Public Comment:** Interested persons may electronically submit written comments on the
11 proposed rule to amanda@asmii.net with the subject line “OTCC Member
12 State Implementation Rule Comment” or by attending the meeting at
13 which the rule will be discussed and voted on.

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15 **Effective:** TBD (30 days after full commission approval)

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17 **Reason for Rule:** To further outline Member State requirements in accordance with Section
18 3.

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20 **History for Rule:** *October 15, 2024:* Rule introduced at Rules Committee meeting
21 *November 19, 2024:* Rule approved at Rules Committee Meeting; sent to
22 Executive Committee for consideration
23 *December 9, 2024:* Rule introduced at Executive Committee meeting.
24 *December 9, 2024:* Rule reviewed and approved by the Executive
25 Committee for vote by full OTCC
26 *January 13, 2025 – February 14, 2025:* Draft rule posted for 30-day
27 public comment period
28 *February 18, 2025:* OTCC Rules Committee draft a response to the
29 public comments received
30 *April 16, 2025:* rule voted on by OTCC

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33 **Chapter 4:** Member State Implementation

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35 **Authority:** Section 3: State Participation in the Compact

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37 **4.0 Purpose:** Pursuant to Section 8.C.6 and Section 10, the Occupational Therapy
38 Compact Commission shall promulgate reasonable and lawful uniform
39 rules to facilitate and coordinate implementation and administration of the
40 Occupational Therapy Compact. This rule will become effective upon
41 passage by the Occupational Therapy Compact Commission as provided
42 in Section 10 of the Occupational Therapy Compact.

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44 **4.1 Implementation by new Member States**

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A member state cannot participate in issuing or recognizing compact Privileges to Practice until such Member State has completed all the following requirements:

(A) Fully implement the FBI Criminal Background Check requirement established in *Implementation of Criminal Background Check Rule*.

(B) Require continuing competence/education for renewal for occupational therapists and occupational therapy assistants.

(C) Utilize only a recognized national examination as a requirement for licensure pursuant to Section 3.A.7 and the *National Exam Definition Rule*.

(D) Fully implement the requirements of *Data System Reporting Requirements Rule*.