



January 10, 2025

Re: Public Comment Notice for Occupational Therapy Compact Commission (OTCC) OTC Fees (Administrative and State) Rules

The OTCC welcomes public input on the proposed OTC Fees (Administrative and State) Rules, which are designed to define terms pursuant to Sections 3.C., 4.A.7, 5.B., and 8.D, 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 OTC Fees (Administrative and State) 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 OTC Fees (Administrative and State) 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 OTC Fees (Administrative and State) 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 OTC Fees (Administrative and State) 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 OTC Fees (Administrative and State) 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 OTC Fees (Administrative and State) 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

**Occupational Therapy Compact (OT Compact)
OT Compact Commission**

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Title of Rule: Rule on OTC Fees (Administrative and State)

Drafted: October 15, 2024

Meeting at which the Rule will be discussed and voted on: April 16, 2025

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

Effective: TBD (30 days after full commission approval)

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

Chapter 7: Rulemaking on Fees

Authority: Section 3: State Participation in the Compact

7.0 Purpose: **Pursuant to Section 3.C, 4.A.7, and 8.E.2.F.3,** Member States and the Commission may charge a fee for granting the Privilege to Practice. Section 4.A.7 requires the licensee to pay any applicable fees, including any State fee, for the Privilege to Practice.

The Commission shall promulgate reasonable and lawful uniform rules to facilitate and coordinate the implementation and administration of the OT Compact. This rule will become effective upon passage by the Commission as provided in Section 8 of the OT Compact.

7.1 Definitions: “Commission Administrative Fee” means a fee paid as part of a Privilege to Practice request and paid to the Commission.

41 “State Fee” means a non-refundable fee established by each individual
42 Member State. The fee is collected by the Commission and forwarded to
43 the Member State.

44 **7.2 Commission Administrative Fees:**

45 A non-refundable Commission Administrative Fee of \$75.00 (seventy-five
46 dollars) shall be paid by the licensee to the Commission for each state in
47 which a Privilege to Practice is requested in addition to each individual
48 State’s Fee, if applicable.

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50 The Commission Administrative Fee is subject to change through the Rule
51 Making authority of the Commission.

52 **7.3 State Fees:**

53 Member States may establish their State Fee in accordance with the
54 Member State’s required processes to be paid by the licensee to the
55 Commission.

56 The Commission shall remit to the Member State 100 percent (one
57 hundred percent) of the State Fee on a basis as established in this Rule.

58 State Fees may be changed by the Member State with 30 (thirty) days’
59 notice of intent to the Commission to change the fee in accordance with
60 the Member State’s required processes. The notice shall be posted to the
61 Member State’s website and the Commission website.

62 **7.4 Delegation of collection and disbursement of fees**

63 On its behalf and on behalf of the Member State, the Commission shall
64 provide and administer a process to collect Commission Administrative
65 Fees and State Fees from licensees. The Commission shall remit the
66 collected fees to the Member States in accordance with the provisions of
67 this rule.

68 The Commission shall provide an itemization sufficient to permit the
69 Member State to reconcile the fees.

70 The Commission shall effectuate fund disbursement of collected Member
71 State Fees starting on the 15th of the month after which the fee was
72 collected.

73 **7.5 Insufficient funds; Failed payments; Disputed charges**

74 A non-refundable service fee of \$100.00 shall be imposed on an individual
75 who submits a payment to the Commission for administrative or state fees
76 without sufficient funds in the payer's account. One hundred percent
77 (100%) of the fee shall be deposited in the Commission's general fund to
78 cover costs incurred in attempting to process failed payment
79 transaction(s).