



Occupational Therapy Compact Commission

Rules Committee Meeting

Minutes: February 18, 2025

Member	Attendance	VOTES					
		Agenda	Minutes	No item	No item	No item	Adjourn
Claire Covert-Bybee, Chair	P	Y	Y	---	---	---	---
Adrienne Price	P Arrived at 2:49p CST	---	---	---	---	---	---
Vanessa Beauchamp	P	Y	Y	---	---	---	---
Teri Black	P	Y	Y	---	---	---	---
VACANT	---	---	---	---	---	---	---
TOTALS	3/4 voting members initially; then 4/4; quorum present	3/3 motion carries	3/3 motion carries	---	---	---	Chair adjourned by acclimation

Other attendees (non-voting)		
Name	Role	Organization
Nahale Kalfas	Legal Counsel	OTCC
Amanda Perry	Executive Director	OTCC
Brandy Villareal	Member of the Public	OT Student

Welcome/Call to Order

- Chair C. Covert-Bybee called the meeting to order at 2:33p CST.

Roll Call

- A. Perry called the roll; quorum was present; attendance reflected in chart above.

Review and Adoption of the Agenda

- Chair C. Covert-Bybee reviewed and called for a motion to adopt the agenda.
- **Motion:**
 - **T. Black motioned that the committee adopt the agenda as presented.**
 - **V. Beauchamp seconded the motion.**
 - **All voted in favor; 0 abstained; the motion carried.**

Review and Adoption of the Minutes

- Chair Covert-Bybee reviewed the minutes from the previous meeting and called for a motion to adopt them as presented.
- **Motion:**
 - **V. Beauchamp motioned that the committee adopt the minutes as presented.**
 - **T. Black seconded the motion.**
 - **All voted in favor; 0 abstained; the motion carried.**

Public Comment Review

- The RC reviewed the public comments regarding the draft rule on *National Exam Definitions*
 - 1 supportive comment received
 - No substantive concerns to address through rule modification
- The RC reviewed the public comments regarding the draft rule on *Member State Implementation*
 - 1 supportive comment received
 - No substantive concerns to address through rule modification
- The RC reviewed the public comments regarding the draft rule on *OTC Fees (Administrative & State)*
 - 9 comments received
 - No substantive concerns to address through rule modification
 - RC determined that some of the comments warranted an educational opportunity to clarify the reason for and process behind establishing an OTC Administrative Fee for the purposes of the Compact and Commission's financial sustainability.
 - RC delegated the responses to the OTCC's legal counsel and executive director; they will draft responses and send them back to the RC for review before publicly posting

Rules Development:

- Chair Covert-Bybee initiated this topic by summarizing the recent Executive Committee's discussion about establishing two timelines (state implementation, professionals) for implementing FBI CBCs. States' challenges with this were revisited, including:
 - inability to obtain FBI ORI (originating agency identifier) for the purposes of issuing compact privileges to practice

- inability to obtain FBI ORI for licensure decisions because legislation does not exist in some states' OT practice acts
- FBI regional offices are inconsistent in their support/denial of this process
- OTCC's legal counsel, N. Kalfas, reached out to peer attorneys for a legal interpretation of the section of OTC legislation that states "shall implement or utilize procedures for considering the criminal history records of applicants...within a time frame established by the Commission, require a criminal background check...(Sec.3.A.5). She awaits an interpretive response.
- Change in Home State designation
 - This discussion was tabled until the FBI CBC timeline rules are developed as charged by the OTCC Executive Committee during its 2.10.25 meeting.

Military Specific Rules

- Discussion postponed to a future meeting.

Questions and Comments

- Chair C. Covert-Bybee called for additional questions and comments from the members and the public.
 - Member comments: none
 - Public comments: none

Adjournment

- **Hearing no further discussion, Chair Covert-Bybee adjourned the meeting via acclamation at 4:01p CST with no opposition from the members.**