



Occupational Therapy Compact Commission

Compliance Committee Meeting

Minutes: February 19, 2025

Member	Attendance	VOTES					
		Agenda	Minutes	No item	No item	No item	Adjourn
Vanessa Beauchamp	A	---	---	---	---	---	---
Jessica Bolduc	P	Y	Y	---	---	---	---
Nicole Harris	P	Y	Y	---	---	---	---
Adrienne Price	P	Y	Y	---	---	---	---
Danielle Ward	P	Y	Y	---	---	---	---
TOTALS	4/5 voting members; quorum present	4/4 motion carries	4/4 motion carries	---	---	---	Adjourned by acclimation

Other attendees (non-voting)		
Name	Role	Organization
Nahale Kalfas	Legal Counsel	OTCC
Amanda Perry	Executive Director	OTCC

Welcome/Call to Order

- Chair Price called the meeting to order at 9:33a CST.

Roll Call

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

Review and Adoption of the Agenda

- Chair Price reviewed and called for a motion to adopt the agenda as presented noting that the times on the agenda will be flexed due to the meeting starting 30 mins later than initially scheduled.
- **Motion:**
 - J. Bolduc motioned that the committee adopt the agenda as presented.
 - N. Harris seconded the motion.
 - All voted in favor; 0 abstained; the motion carried.

Review and Adoption of the Minutes

- A. Perry displayed the minutes from the previous meeting.
- **Motion:**
 - N. Harris motioned to adopt the minutes as presented.
 - J. Bolduc seconded the motion.
 - All voted in favor; 0 abstained; the motion carried.

Compact State Accountability Discussion

- In the October 2024 meeting, the Compliance Committee determined that ease of access to state information is necessary to ensure that OT/OTA practitioners can locate relevant information on each OTC state board's websites.
 - Scopes of Practice / Practice Acts
 - Status of FBI CBC implementation
 - Continuing Education Unit requirements
 - Link to the OT Compact website homepage: www.otcompact.org
- Members of the Compliance Committee and the Executive Director divided up the 31 existing OTC states to determine how easily accessible this information is and whether the states are compliant with providing it on their licensing board websites.

A. Price	N. Harris	J. Bolduc	A. Perry
Georgia	Washington	Maine	Minnesota
Alabama	Montana	Vermont	Wisconsin
Tennessee	Wyoming	New Hampshire	Iowa
South Carolina	Colorado	Rhode Island	Missouri
North Carolina	Utah	Delaware	Arkansas
Kentucky	Arizona	Maryland	Louisiana
Virginia	South Dakota	Ohio	Mississippi
West Virginia	Nebraska	Indiana	

- These committee members completed their compliance assessments and returned them to A. Perry by CoB on Wednesday, November 20, 2024.
- A. Perry combined the research findings into one Excel document for the Compliance Committee to review.
- Chair Price reviewed the results with the intention of discussing the findings to determine a pathway toward state accountability with the OTC requirements. The highlights of that discussion are noted here:
 - Most states have the information accessible on their websites
 - There is a need to do proactive outreach to states to remind them of the OTC requirements and to maintain ongoing proactive engagement to support states
 - At this point in the OTC implementation, accountability is best achieved through supportive onboarding and ongoing guidance; non-punitive
 - OTCC's legal counsel, N. Kalfas, shared that she consulted with peer compact attorneys for their interpretation of the FBI CBC rule in Sec.3.A.5 of the OTC legislation. The feedback indicates that the timeline for implementation is not a pass for states to issue privileges to practice until they can achieve the implementation of FBI CBCs; instead, the timeline is focused on how long the OTCC will allow a state to remain a dormant member of the compact before taking compliance action. States will have to make an effort to obtain the necessary ORI number to implement FBI CBCs; OTCC Rules Committee will need to implement a legally flexible rule to address this concern.
 - Q: Are all/most compact disciplines experiencing the FBI CBC implementation struggle?
 - A: Yes, FBI regional offices inconsistently apply standards; some states cannot obtain the necessary ORI number to implement the FBI CBC process for compact privileges; some states are compliant because FBI CBCs are in their OT practice acts; some states need to consider changing their practice act legislation to require FBI CBCs for licensure; the federal SHARE Act is reintroduced to Congress this session – hopefully there is movement though there has been little support in recent years.
 - The OTC will not receive results from FBI CBCs. Instead, states will deem licensees “eligible” (or not) based on a multi-part set of criteria that is not exclusive to passing (or not) an FBI CBC.
- Future discussions about state accountability will need to focus on a process, for example (based on other professional licensure interstate compact documented processes):
 - Proactive engagement (to address concerns) → state responds with plan of correction → plan reviewed by OTCC Compliance Committee (CC) → plan approved by CC and/or sent to OTCC Executive Committee for review/approval → Compliance Committee communicates next steps back to state → state complies with requirements
- The CC determined that the best actionable next step at this time is for A. Perry as the OTCC Executive Director to send a blanket email to all OTCC Commissioners and State Administrators that covers the following topics/reminders:
 - Documented process for requiring CEUs
 - Documented process indicating steps taken to achieve FBI CBC implementation
 - OTC website and public comments (when necessary) posted on board websites
 - Whether states have a jurisprudence requirement for licensure

- Reminder of the 2.26.25 CompactConnect webinar – invite state IT, admins, and commissioners; registration required; sent as a calendar invite a few weeks ago
- A. Perry will draft and send this email to OTCC Commissioners and state administrators this week
- **Motion:**
 - **This was not a voting item.**

Questions and Comments

- Chair Price called for further comments and discussions from the Compliance Committee members
 - A. Perry asked if N. Harris and J. Bolduc (both licensed OTs) are willing to pilot the OTC application process in CompactConnect; both agreed; Chair Price will also provide names of some GA OT board members who might want to participate in that pilot process too.
 - No further comments
- Chair Price called for comments from members of the public:
 - No public members present; no public comments noted

Adjournment

- **Hearing no further discussion, Chair Price adjourned the meeting via acclamation at 10:30a CST with no opposition from the members.**