



**Occupational Therapy Compact Commission
Rules Committee Meeting
Minutes: June 3, 2025**

Member	Attendance	VOTES					
		Agenda	Minutes	Amend FBI CBC Rule	No item	No item	Adjourn
Claire Covert-Bybee, Chair	P	Y	Y	Y	---	---	---
Adrienne Price	A	---	---	---	---	---	---
Vanessa Beauchamp	P	Y	Y	Y	---	---	---
Teri Black	P	Y	Y	Y	---	---	---
Dr. Van Culotta	A	---	---	---	---	---	---
TOTALS	3/5 voting members; quorum present	3/3 motion carries	3/3 motion carries	3/3 motion carries	---	---	Chair adjourned via acclimation at 3:43p CST

Other attendees (non-voting)		
Name	Role	Organization
Nahale Kalfas	Legal Counsel	OTCC
Amanda Perry	Executive Director	OTCC
Vonda Malnikoff	OTCC Commissioner	West Virginia
Kevin Logan	Member of the Public	NBCOT

Welcome/Call to Order

- Chair C. Covert-Bybee called the meeting to order at 2:32p 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:**
 - **T. Black motioned that the committee adopt the minutes as presented.**
 - **V. Beauchamp seconded the motion.**
 - **All voted in favor; 0 abstained; the motion carried.**

Rules Documentation

- A. Perry shared that the promulgation template for rules will be updated to be more consistent across all the existing and future rules. She displayed an example of what she has worked on. No concerns; RC supports the transition to the new template.
- A. Perry requested feedback regarding the RC's preference to have rules posted separately as individual rules (current process) or to switch to having them in one document.
 - RC's preference is to have all of the OTCC rules in one document on the *OTCC Governance Documents* webpage.
 - Final rules will be posted with rule content/language, adopted date, effective date, amended date (if applicable), new effective date (if amended).
 - Other rule history and purpose will be left on the promulgation template for the rule (ex: public comment periods).

Rules Development:

- Drafted amendments to the *Rule on FBI Criminal Background Checks (FBI CBCs)*
 - Some original language struck to increase clarity and prevent redundancy with added language
 - Added language clarifies the process for states to move forward with issuing OTC privileges to practice even with challenges implementing FBI CBCs.
 - Added language explains states' utilization of "legal impossibility" on a temporary basis.
 - Added language explains practitioners' responsibilities to obtain FBI CBC when possible.
 - Draft version voted forward to the Executive Committee for their review.
- **Motion:**

- **T. Black motioned that the committee adopt the substance of the rule as presented and send it to the Executive Committee for review, with delegated authority to the Rules Chair, Legal Counsel, and Executive Director to add in correct citations/references and correct any grammatical or spelling errors.**
- **V. Beauchamp seconded the motion.**
- **All voted in favor; 0 abstained; the motion carried.**
- Rules Development Discussions that were tabled for future meetings
 - Timeline for Applicants to Have FBI CBC in states where it is already conducted
 - Change in Home State Designation
 - Military Specific Rules
 - Home state designation process
 - Changing home state designation
 - Clarifying U.S. Code that is misquoted in the OTC legislation
 - Fee waivers (if desired)
 - Utility of printed OTC verification documents
 - Documents/Pages from CompactConnect

Questions and Comments

- Chair C. Covert-Bybee called for additional questions and comments from the members and the public.
 - Member comments: cancel June 17, 2025 OTCC RC meeting due to multiple conflicts.
 - Public comments: none

Adjournment

- Hearing no further discussion, Chair Covert-Bybee adjourned the meeting via acclamation at 3:43p CST with no opposition from the members.
- **Next Meeting: July 15, 2025**