

Occupational Therapy Compact Commission (OTCC)

Chapter 3: Data System Reporting Requirements

DRAFT AMENDMENTS

Rule Title	Data System Reporting Requirements
Rule History	<ul style="list-style-type: none">• March 28, 2023: Rule Introduced at Rules Committee Meeting.• April 18, 2023: Rule Approved as Amended at Rules Committee Meeting. Sent to Executive Committee for consideration.• May 1, 2023: Rule Introduced at Executive Committee Meeting.• May 8, 2023: Rule reviewed at Executive Committee meeting and EC voted to return to Rules Committee for further consideration and revisions.• May 16, 2023: Rule revised at Rules Committee meeting and approved as further amended to be sent to Executive Committee for reconsideration.• June 12, 2023: Rule, as further amended, reintroduced to Executive Committee and Executive Committee voted to return to Rules Committee for further revisions.• June 27, 2023: Rule revised at Rules Committee meeting and approved as further amended to be returned to Executive Committee for consideration.• October 12, 2023: Rule, as further amended, introduced at Executive Committee, and approved by the OTCC Executive Committee for vote by full Commission.• November 8 – December 8, 2023: draft rule posted for public comment• January 16, 2024: OTCC Rules Committee drafted and approved a response to the public comments received; no substantial changes made to this rule.• March 20, 2024: approved by OTCC with majority vote• July 15, 2025: Draft amendments completed by OTCC Rules Committee• August 11, 2025: Amendments voted to public comment by OTCC Executive Committee• August 18 – September 19, 2025: Amendment Public Comment Period• October 30, 2025: voted by OTCC

Authority

Authority for this rule is in the Occupational Therapy Licensure Compact Model Legislation.

§Section 8: *Establishment of the Occupational Therapy Interstate Compact Commission*

§Section 9: *Data System*

§Section 10: *Rulemaking*

Purpose

Pursuant to §Section 10 of the *Occupational Therapy Licensure Compact Model Legislation*, the Occupational Therapy Compact Commission shall promulgate reasonable and lawful uniform rules to facilitate and coordinate implementation and administration of the Occupational Therapy Interstate Compact.

§Definitions

No definitions specific to this rule

Chapter 3: Data System Reporting Requirements

Rule 3.1 Uniform Data Set and Levels of Access:

- A. The Commission shall provide for the development, maintenance, and utilization of a coordinated database and reporting system containing licensure, adverse action, and investigative information on all licensed individuals in member states.
- B. Notwithstanding any other provision of state law to the contrary, a member state shall submit a uniform data set to the data system on all individuals to whom this Compact is applicable as required by the rules of the Commission, including but not limited to:
 - i. Identifying information – including but not limited to:
 - a. First name
 - b. Middle name
 - c. Last name
 - d. Suffix, if applicable
 - e. Birth date (mm/dd/yyyy)
 - f. Unique Identifier:
 - i. United States' Social Security Number or
 - ii. NBCOT certification number (as accommodated in CompactConnect) or
 - iii. National Provider Identification Number (NPI) (as accommodated in CompactConnect) or
 - iv. other unique identifier(s) as approved by the Commission (as accommodated in CompactConnect)
 - g. Home state address
 - h. Email address (as accommodated by states)
 - ii. Licensure Data – including but not limited to:

- 41 a. Jurisdiction of license
42 b. License type (occupational therapist or occupational therapy assistant)
43 c. License number
44 d. Initial issuance date
45 e. Most recent renewal date
46 f. Expiration date
47 g. License status
48 iii. Adverse action(s) against a license or compact privilege to practice including but not
49 limited to:
50 a. type of adverse action
51 b. status and change in status of adverse action
52 c. effective dates of adverse action
53 d. the existence of current significant investigative information
54 e. summary suspension and final disciplinary actions, as defined by the member
55 state authority
56 f. non-confidential information related to alternative program participation
57 including but not limited to current participation by the occupational therapist or
58 occupational therapy assistant in an alternative program
59 g. any denial of application for licensure, and the reason(s) for denial
60 h. other information that may facilitate the administration of this Compact, as
61 determined by the rules of the Commission including but not limited to a
62 correction to a licensee's data.
63 C. The member states shall have access, via the data system, to information including but not
64 limited to the verification of compact privilege(s) to practice held by eligible licensees.
65 D. The public shall have access, via the Commission's website, to information limited to the
66 verification of compact privilege(s) held by individuals.
67 E. The home state shall be responsible for verification of uniform requirements for participation
68 as described in §3 and 4 of the Compact.
69 F. Current significant investigative information pertaining to a licensee in any member state
70 shall only be available to other member states.
71 G. If a member state takes adverse action, it shall notify the administrator of the data system
72 within ten business days of the date action was taken. The administrator of the data system
73 shall notify the home state of any adverse actions by remote states.
74 H. Member states contributing information to the data system may designate information that
75 may not be shared with the public without the express permission of the contributing state.
76 I. In the event an occupational therapist or occupational therapy assistant asserts that any
77 coordinated licensure information system data is inaccurate, the burden shall be upon the
78 occupational therapist or occupational therapy assistant to provide evidence in a manner
79 determined by the member state that substantiates such claim.

- J. Member states shall submit the data system information required above to the Commission at least one time per week.
- K. Any information submitted to the data system that is subsequently required to be expunged by the laws of the member state contributing the information, shall be removed from the data system.
- L. No member state shall submit any information that constitutes non-administrative criminal history record information, as defined by applicable federal law, to the data system established hereunder.

Adopted March 20, 2024; Effective April 20, 2024; **Amended XXX; Effective XXX**
Authority: §8, 9, 10 in the OTC Legislation



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