

Occupational Therapy Compact Commission Rules Committee Meeting Minutes: November 18, 2025

			VOTES				
Member	Attendance	Agenda	Minutes	PtP to HSL Rule	No item	No item	Adjourn
Claire Covert-Bybee, Chair	Р	Y	Y	Y			
Adrienne Price	P Joined at 3:06p			Y			
Vanessa Beauchamp	Р	Υ	Υ	Y			
Teri Black	P Departed at 3:30p	Υ	Y				
Dr. Van Culotta	Α						
TOTALS	3/5 voting members; quorum present	3/3 motion carries	3/3 motion carries	3/3 motion carries			Meeting adjourned via acclimation at 3:48 p CST

Other attendees (non-voting)					
Name	Role	Organization			
Nahale Kalfas	Legal Counsel	ОТСС			
Amanda Perry	Executive Director	ОТСС			
Francielle Pineda	Member of the Public	NBCOT			

Welcome/Call to Order

Chair C. Covert-Bybee called the meeting to order at 2:38p CT.

Roll Call

- A. Perry called the roll; quorum was present; attendance reflected in chart above.
 - 3/5 voting members present at roll call
 - 3/5 voting members present during the majority of the meeting with one arriving late and one departing early

Review and Adoption of the Agenda

- Chair Covert-Bybee reviewed and called for a motion to adopt the agenda.
- Motion:
 - T. Black motioned that the committee adopt the agenda as presented.
 - O 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.

• Motion:

- V. Beauchamp motioned that the committee adopt the minutes as presented.
- T. Black seconded the motion.
- o All voted in favor; 0 abstained; the motion carried.

Privilege to Practice to Home State License Rule Revisions (PtP to HSL)

- Chair Covert-Bybee explained that during the OTCC Meeting on 10.30.25, the Commissioners voted to table the "Privilege to Practice to Home State License" rule because they agreed that it needed some revisions.
- Counsel Kalfas explained that the revisions should be rooted in the existing OTC law regarding states performing FBI CBCs and practitioners being required to have FBI CBCs done before they can receive a PtP or convert an existing PtP to HSL.
- A federal law reference in the OTC law is also referenced in this rule (Public Law 92-544). It was
 determined that further research needs to be conducted by Counsel Kalfas to ensure that the most
 accurate federal law is referenced. This will be completed before the rule moves to the Executive
 Committee for review.
- The Rules Committee determined what language needed to be revised so the rule could be represented to the Executive Committee and routed back through the rulemaking process for a future OTCC vote.
- It was determined that the revisions are substantive, so the revised rule needs to be posted for public comment before it is voted on by the OTCC in spring 2026.
- The revised rule will be posted on the OTC's Meetings 2025 webpage ahead of the December Executive Committee meeting. Revisions can be accessed from that document.
- Motion:

- V. Beachamp motioned to approve the revisions to the "Privilege to Practice to Home State License" rule with a charge to OTC's legal counsel to rectify the federal law reference to ensure the most appropriate federal law is referenced in the revised rule.
- o A. Price seconded the motion.
- O All voted in favor; no one abstained; motion carried.

Member State Compliance Rule/Resource Discussion

- Chair Covert-Bybee explained that she, Counsel Kalfas, and A. Perry conducted research to
 determine which existing licensure compacts' state compliance rules most closely aligned with the
 vision for the OTC's similar rules. The three determined that the Physical Therapy Compact (PTC)
 rules are the most appropriate to model.
- A. Perry displayed a version of the PTC's rule adapted to fit the OTC rule format.
- The committee members discussed the contents of the rule and determined that most of the rule is appropriate. A. Perry will finalize a draft version of the rule to include correct citations from OTC law/rules and the correct rule chapter, change language to reflect OTC common language (e.g., Executive Board will be Executive Committee), etc. She will also include language that explains the flow process for state compliance issues and concerns between states. That draft will be shared with the RC ahead of the January 2026 RC meeting.

Motion:

Not a voting item; discussion only

Questions and Comments

- Chair Price called for additional questions and comments from the members and the public.
 - Member comments: none
 - Public comments: F. Pineda thanked the Rules Committee for the hard work and thoughtful discussions.

Adjournment

- Hearing no further discussion, Chair Price adjourned the meeting via acclimation at 3:48p CT with no opposition from the members.
- Next Meeting: January 20, 2026