

# Occupational Therapy Compact Commission (OTCC)

2025 Special Business Meeting:  
Minutes



**Date: Thursday, October 30, 2025**

**Start Time: 1:30p CT (2:30p ET)**

**Location: Virtual Zoom Link: <https://zoom.us/j/92662307892> (no in person option)**

TOPIC <small>*Indicates voting item</small>	FACILITATOR(S)
<b>Welcome, Call to Order, Roll Call</b> <ul style="list-style-type: none"><li>• Introduction of states &amp; commissioners</li></ul>	Chair, Exec. Dir.
<b>Review and Adopt Agenda*</b>	Chair
<b>Review and Adopt Minutes*</b> <ul style="list-style-type: none"><li>• April 16, 2025 OTCC Annual Business Meeting</li></ul>	Chair
<b>Amendments to Rule on FBI CBCs*</b> <ul style="list-style-type: none"><li>• Discussion</li><li>• Roll Call Vote</li></ul>	Rules Chair, Chair
<b>Amendments to Rule on Data System Reporting Requirements*</b> <ul style="list-style-type: none"><li>• Discussion</li><li>• Roll Call Vote</li></ul>	Rules Chair, Chair
<b>Rule on Transitioning an OTC Privilege to Practice to a Home State License (PtP to HSL)*</b> <ul style="list-style-type: none"><li>• Discussion</li><li>• Roll Call Vote</li></ul>	Rules Chair, Chair
<b>FY26 Budget*</b> <ul style="list-style-type: none"><li>• Discussion</li><li>• Roll Call Vote</li></ul>	Finance Chair, Chair
<b>OTC Application Launch / CompactConnect</b> <ul style="list-style-type: none"><li>• Updates</li></ul>	Executive Director
<b>Discussions or Comments</b> <ul style="list-style-type: none"><li>• Commissioners</li><li>• Members of the public</li></ul>	Chair
<b>Adjourn*</b>	Chair

# Occupational Therapy Compact Commission (OTCC)

2025 Special Business Meeting:  
Minutes



State	Commissioner	Attendance	Agenda	Minutes	Motion to Amend the Amended FBI CBC Rule	Draft Amendments to Rule FBI CBCs	Draft Amendments to Rule DSRR	Draft Rule PtP to HSL <i>Motion to Table</i>	FY26 Budget
1. Alabama	Amanda Smith	Present	Yes	Yes	Yes	Yes	Yes	Yes	Yes
2. Arizona	Chris Daly	Present	Yes	Yes	No	Yes	Yes	Yes	Second Yes
3. Arkansas	Juli Carlson	Present	Yes	Yes	Yes	Second Yes	Yes	Yes	Yes
4. Colorado	Zen Mayhugh	Absent	---	---	---	---	---	---	---
5. Delaware	Karen Rohrer	Present	Yes	Yes	Yes	Yes	Yes	Yes	Yes
6. Georgia	Adrienne Price	Present	Yes	Yes	No	Yes	Yes	Yes	Yes
7. Indiana	Sharon Pape	Present	Yes	Yes	No	Yes	Yes	Yes	Yes
8. Iowa	Venus Vendoures-Walsh	Present	Yes	Yes	No	Yes	Yes	Yes	Yes
9. Kentucky	Rhonda "Jill" Phelps	Absent	---	---	---	---	---	---	---
10. Louisiana	Vincent Culotta	Present	Yes	Yes	Motion Yes	Abstain	Yes	Motion to Table the Vote Yes	Motion Yes
11. Maine	Jessica Bolduc	Present	Yes	Second Yes	No	Yes	Yes	Yes	Yes
12. Maryland	Michelle Bianchi	Present	Yes	Yes	Yes	Yes	Yes	Yes	Yes
13. Minnesota	Christina "Chris" Bourland	Present	Yes	Yes	Yes	No	Yes	Yes	Yes
14. Mississippi	Felicia Wang	Present	Yes	Yes	No	Yes	Yes	Yes	Yes
15. Missouri	Vanessa Beauchamp	Present	Motion Yes	Yes	No	Yes	Motion Yes	Yes	Yes
16. Montana	Trent Gahl	Present	Yes	Yes	Second Yes	Abstain	Yes	Yes	Yes
17. Nebraska	Claire Covert-Bybee	Present	Yes	Yes	No	Yes	Yes	Yes	Yes
18. New Hampshire	Erica Lamy	Absent	---	---	---	---	---	---	---
19. North Carolina	Danielle Ward	Present	Yes	Motion Yes	No	Yes	Yes	Yes	Yes
20. North Dakota	Jacinda Simmons	Present	Yes	Yes	Yes	Yes	Yes	Yes	Yes
21. Ohio	Missy Anthony	Present	Second Yes	Yes	No	Yes	Second Yes	Yes	Yes
22. Rhode Island	Lisa Faulise	Absent	---	---	---	---	---	---	---
23. South Carolina	Lesly James	Present	Yes	Yes	No	Yes	Yes	Yes	Yes
24. South Dakota	Megan Johnke Katherine Christensen	Present	Yes	Yes	Yes	Yes	Yes	Yes	Yes
25. Tennessee	Noranda French	Present	Yes	Yes	Yes	No	Yes	Yes	Yes
26. Utah	Lisa Martin	Present	Yes	Yes	No	Yes	Yes	Yes	Yes
27. Vermont	Emily Tredeau	Present	Yes	Yes	Yes	Yes	Yes	Yes	Yes
28. Virginia	Leah Savelyev	Present	Yes	Yes	Yes	Yes	Yes	Yes	Yes

# Occupational Therapy Compact Commission (OTCC)

2025 Special Business Meeting:  
Minutes



29. Washington	Kathy Weed	Present	Yes	Yes	Yes	Yes	Yes	Second to Table the Vote Yes	Yes
30. West Virginia	Vonda Malnikoff	Present	Yes	Yes	No	Yes	Yes	Yes	Yes
31. Wisconsin	Teri Black	Present	Yes	Yes	No	Motion Yes	Yes	Yes	Yes
32. Wyoming	Andrew Stiles	Absent	---	---	---	---	---	---	---
AOTA	Chuck Willmarth	Present							
NBCOT	Barbara Williams	Present							
TOTALS		27/32 voting commissioners present; quorum	27 = Y 0 = Abst. 0 = N Motion Carries	27 = Y 0 = Abst. 0 = N Motion Carries	13 = Y 0 = Abst. 14 = No Motion Fails	23 = Y 2 = Abst. 2 = N Motion Carries	27 = Y 0 = Abstain 0 = N Motion Carries	27 = Y 0 = Abstain 0 = N Motion Carries Vote Tabled	27 = Y 0 = Abstain 0 = N Motion Carries

## Welcome, Call to Order, Roll Call

- Chair Lesly James welcomed attendees.
- Chair James called the meeting to order at 1:34p CT
- A. Perry called roll by state; attendance is reflected in the chart above.
  - voting quorum present

## Voting item: Review and Adopt Agenda

- Chair James reviewed the agenda as posted and called for discussion and a motion to approve the agenda.
- **Motion:**
  - **V. Beauchamp (MO)** motioned for the agenda to be accepted as presented.
  - **M. Anthony (OH)** seconded the motion.
  - **A. Perry** conducted a roll call vote by state.
  - **27** voted in favor; **0** voted no; **0** abstained. Votes are captured in the chart above. Motion carries.

## Voting item: Review and Adopt Minutes from April 2025 OTCC ABM

- Chair James reviewed the minutes from the April 2025 OTCC ABM and called for discussion and a motion to approve the minutes.
- **Motion:**
  - **D. Ward (NC)** motioned to approve the minutes from the April 2025 OTCC ABM as drafted and presented.
  - **J. Bolduc (ME)** seconded the motion.
  - **A. Perry** conducted a roll call vote by state.
  - **27** voted in favor; **0** voted no; **0** abstained. Votes are captured in the chart above. Motion carries.

## **Voting Item: Amendments to Rule on Federal Bureau of Investigation Criminal Background Checks (FBI CBCs)**

- Chair James asked the OTCC Rules Committee Chair, C. Covert-Bybee, to present this agenda item.
- Rules Chair Covert-Bybee provided historical context to the original rule's intents and purposes and explained the context and necessity for the amendments.
- Covert-Bybee explained that the amendments to the rule went through the appropriate rulemaking process where public comments were received and addressed. No substantive changes were made to the rule during the process.
- Minnesota's Commissioner raised a concern about the amendment allowing for states to not perform FBI CBCs on practitioners due to legal impossibility. The concern was for states who do perform FBI CBCs on their licensed practitioners to have to allow practitioners from "legal impossibility" states to practice in their states.
- Louisiana shared the same concern.
- Advocates for the rule amendments addressed the concerns with the following thoughts:
  - Data sharing through CompactConnect (the data system) supports state-to-state visibility on practitioners who practice through the OTC.
  - The states who are unable to perform FBI CBCs due to the FBI not accepting their applications/providing a pathway for them to be performed will not be able to participate in the OTC without the legal impossibility pathway/amendments.
    - The OTC will not fully operationalize until all member states can participate.
  - While still uncertain, the SHARE Act is more supported than ever before for the 2026 legislative session. There is a stronger possibility that it could pass than in years past. The SHARE Act would mitigate all concerns because states could perform FBI CBCs. SHARE = States Handling Access to Reciprocity for Employment. [H.R. 2332 – SHARE Act of 2025 \(2025-2026\)](#)
- **Motion:**
  - **T. Black (WI) motioned to approve the proposed amendments to the Rule on FBI CBCs as presented.**
  - **J. Carlson (AR) seconded the motion.**
  - **A vote was delayed because V. Culotta (LA) made a motion to further amend the rule.**
- **Motion:**
  - **V. Culotta motioned to further amend the proposed amendments to the Rule on FBI CBCs to include the following language: *allow remote states where OTC privileges to practice will be issued to retrospectively perform***

# Occupational Therapy Compact Commission (OTCC)

2025 Special Business Meeting:  
Minutes



## ***FBI CBCs on practitioners whose OTC home state does not perform FBI CBCs.***

- Related Discussion:
  - Commissioners were concerned that this was substantive language and that adding it requires the rule to go back through the rulemaking process, including public comments, which will further delay implementation of the OTC in many states who plan to use the legal impossibility pathway.
  - Suggestion to pass the rule without Culotta's proposed amendments and then amend the rule later to include his suggested language. This allows the legal impossibility pathway to be available on November 30, 2025 (if it passes during today's meeting), without further delays.
  - Suggestion to table the vote altogether and send the proposed amendments to the Rule on FBI CBCs back to the rules committee for further revisions, to consider Culotta's proposed language.
    - Concerns that this further delays implementation.
  - Suggestion to move forward with a vote on the motion (if it is seconded), sending the rule back through the rulemaking process.
  - It was noted that remote states will not know who has or has not had an FBI CBC performed because that information is not shared through CompactConnect.
    - When a person applies for an OTC Privilege to Practice, their information and license status is immediately verified through CompactConnect, and they instantaneously receive their Privilege to Practice.
    - Remote states cannot verify who has (or has not) had an FBI CBC. If the legal impossibility pathway passes, that means that a person has either:
      - Had an FBI CBC
      - Had a state background check
      - Or had both an FBI CBC and a state background check
    - With the legal impossibility pathway, no practitioners will be eligible unless they have had at a minimum a state background check.
- **V. Culotta's motion was seconded by T. Gahl (MT)**
- **A. Perry performed a roll call vote by state.**
- **13 voted in favor; 14 voted no; 0 abstained; Votes are captured in the chart above. Motion failed.**
- Because the motion failed, the original motion by T. Black was open back up for discussion.

# Occupational Therapy Compact Commission (OTCC)

2025 Special Business Meeting:  
Minutes



- No further discussion noted on the motion.
- V. Culotta expressed appreciation to the OTCC for the thoughtful discussion and consideration of his motion.
- **Motion:**
  - **T. Black (WI) confirmed that her original motion to approve the proposed amendments to the Rule on FBI CBCs as presented stands.**
  - **J. Carlson (AR) confirmed that her original second to T. Black's motion stands.**
  - **A. Perry conducted a roll call vote by state.**
  - **23 voted in favor; 2 voted no; 2 abstained; Votes are captured in the chart above. Motion carries.**

## **Voting Item: Amendment to the Rule on Data System Reporting Requirements**

- Chair James requested that Rules Chair, C. Covert-Bybee, present this agenda item.
- Rules Chair Covert-Bybee provided historical context to the original intent and purpose of the rule and provided context to the proposed amendments to the rule as presented today.
- Chair Covert-Bybee opened the floor for discussion about the rule.
- No discussion noted.
- **Motion:**
  - **V. Beauchamp (MO) motioned to approve the proposed amendments to the Rule on Data System Reporting Requirements as presented.**
  - **M. Anthony (OH) seconded the motion.**
  - **A. Perry conducted a roll call vote by state.**
  - **27 voted in favor; 0 voted no; 0 abstained. Votes are captured in the chart above. Motion carries.**

## **Voting Item: Draft Rule on Transitioning an OTC Privilege to Practice to a Home State License (PtP to HSL)**

- OTC's legal counsel suggested to strike the last bullet point which states:
  - *Satisfactorily complete a Federal Bureau of Investigation (FBI) Criminal Background Check (CBC) in accordance with OT Compact Commission Rules (reference current iteration of the FBI CBC rule)*
- The suggestion to strike this language is because it is not necessary since the requirement is already in the OTC legislation
- Legal Counsel confirmed that striking this language is not substantive and can be done in this meeting without the need to send the draft rule back to through the rulemaking process.
  - Some Commissioners challenged whether it was a substantive change, stating they felt it would need to go back through the rulemaking process.

# Occupational Therapy Compact Commission (OTCC)

2025 Special Business Meeting:  
Minutes



- Suggestion to table the vote and send it back to the OTCC Rules Committee for further revisions.
- No further discussion on this matter.
- **Motion:**
  - **V. Culotta (LA) motioned to table the vote and send the draft Rule on PtP to HSL back to the Rules Committee for further discussion and revisions.**
  - **K. Weed (WA) seconded the motion.**
  - **A. Perry conducted a roll call vote by state.**
  - **27 voted in favor; 0 voted no; 0 abstained. Votes are captured in the chart above. Motion carries.**

## **Voting Item: Fiscal Year 2026 (FY26) Budget**

- Chair James requested that OTCC's Treasurer, D. Ward, present this agenda item.
- Treasurer Ward presented the proposed FY26 OTCC Budget highlighting the anticipated expenses, anticipated revenue from funders, and acknowledging that the revenue and projected year end balance will likely change as the OTC operationalizes and begins generating revenue.
- Treasurer Ward opened the floor for questions and discussion.
- No discussion noted.
- **Motion:**
  - **V. Culotta (LA) motioned to approve the OTCC's FY26 Budget as presented.**
  - **C. Daly (AZ) seconded the motion.**
  - **A. Perry conducted a roll call vote.**
  - **27 voted in favor; 0 voted no; 0 abstained. Votes are captured in the chart above. Motion carries.**

## **Non-Voting Item: Update on OTC Application Launch and CompactConnect**

- K. Schlesinger, the OTC's Project Manager, provided the update on status of state onboarding:
  - 4 states successfully completed the data upload in the Beta test environment.
  - 3 states successfully completed the data upload in the Live/Production environment.
  - 17 states have completed the IT – Technical onboarding training with the developers.
  - 1 state is ready to launch applications. OTC cannot launch until two states are ready.
- A. Perry thanked K. Schlesinger for her hard work and the states for their efforts to complete the technical onboarding steps, acknowledging that it takes a lot of coordination and behind the scenes efforts.

# Occupational Therapy Compact Commission (OTCC)

2025 Special Business Meeting:  
Minutes



- A. Perry shared that she receives many inquiries about when the OTC will be available to practitioners. As such, she has begun to refer the inquirers to the OTC website first and then back to the states. This is because A. Perry, as the OTC administrator, does not speak on behalf of the OTC member states. This allows the member states to determine the best and most consistent messaging to their constituents about when each state will launch applications and why there are perceived delays.
- A. Perry highlighted the importance of keeping K. Schlesinger updated on progress and delays in their onboarding processes. K. Schlesinger will continue to conduct proactive outreach to all member states.
- Acknowledging that the meeting is over time, A. Perry opened the floor for questions and discussions.
- No discussions noted.
- Not a voting item; just an update.

## **Adjourn:**

- Chair James opened the floor for further discussion from:
  - OTCC Commissioners: no further discussion noted
  - Members of the public: no further discussion noted
- Chair James thanked the OTCC for their time and engagement during today's meeting.
- Chair James adjourned the meeting via acclamation at 3:09p CT.