

December 12, 2025

Re: Public Comment Notice for Occupational Therapy Compact Commission (OTCC) Rule on Conversion of OTC Privilege to Practice to Home State License (PtP to HSL)

The OTCC welcomes public input on the proposed Rule on PtP to HSL. This 30-day public comment period provides an opportunity for interested individuals and organizations to express their opinions, concerns, and suggestions on the proposed Rule on PtP to HSL. Your feedback is valuable to us and will be considered in the decision-making process.

I. Purpose:

The purpose of this public comment notice is to encourage and facilitate public input on the proposed Rule on PtP to HSL. We are committed to transparency, accountability, and inclusivity in our decision-making process, and your comments will assist us in refining and finalizing this Rule.

II. Comment Period:

The public comment period for the proposed Rule on PtP to HSL will be open for 30 days, starting from Friday, December 12, 2025 and closing on Monday, January 12, 2026. *All comments must be received by 4:00p.m. CST on Monday, January 12, 2026.*

III. How to Submit Comments:

Email your comments to executivedirector@otcompact.gov. Please indicate “Public Comment for Rule on PtP to HSL” in the subject line of your email. All comments received will be considered part of the public record and may be subject to disclosure under applicable laws.

IV. Public Hearing:

The OTCC meeting to vote on the draft Rule on PtP to HSL is to be determined (TBD) and will be publicly posted at least 30-days before the meeting.

V. Contact Information:

If you have any questions or require further information regarding the proposed Rule on PtP to HSL or this public comment process, please contact the OTCC Executive Director, Amanda Perry, at executivedirector@otcompact.gov.

We look forward to receiving your comments and thank you for your participation in shaping the future of the Occupational Therapy Compact Commission.

Kind regards,

Dr. Lesly Wilson James, Chair
Occupational Therapy Compact Commission

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Rule Title	Rule on Converting a Privilege to Practice to a Home State License (PtP to HSL)
Rule History	<ul style="list-style-type: none"> • Drafted by Rules Committee: July 15, 2025 • Reviewed by OTCC Executive Committee: August 11, 2025 • Vote to Public Comment by Executive Committee: August 11, 2025 • Public Comment Period: August 18 – September 19, 2025 • Vote tabled by the OTCC for further revisions: October 30, 2025 • Revised by the Rules Committee: November 18, 2025 • Voted to Public Comment by the Executive Committee: December 8, 2025 • Public Comment Period: December 12, 2025 – January 12, 2026 • Public Comment Responses by Rules Committee: XXXX • Vote by the OTCC: XXXX
Rule Purpose	To further outline and clarify the requirements of OTC member states' compliance with the OTC legislation
Public Comment Instructions	Submit public comments via email to executivedirector@otcompact.gov . Use the subject line "Public Comment for Rule on PtP to HSL." Or, you may attend the meeting at which the rule will be discussed and voted on. Written comments must be received by close of business on January 12, 2026

Chapter X: Converting a Privilege to Practice to a Home State License

§1: Definitions

No definitions

§2: Special Note

None noted

Rule X.1

Member State Requirements

A. A Member State shall:

- i. Provide a process to convert the privilege to practice to a home state license.
- ii. Convert the Privilege to Practice to a Home State License, if requested by the licensee.
- iii. Utilize CompactConnect (the data system) to verify the eligibility for a new Home State License by virtue of a compact privilege pursuant to Section 5 of the Compact Law.
- iv. Conduct a Federal Bureau of Investigation (FBI) fingerprint based criminal background check if not previously performed or updated pursuant to applicable Rules adopted by the Commission in accordance with Public Law 92-544
- ~~v. Conduct Federal Bureau of Investigation (FBI) Criminal Background Check (CBC) in accordance with state statute and Public Law 92-544.~~

B. A Member State may require:

- i. Payment of a new home state license fee as determined and set by that Member State.
- ii. Other criminal background check as required by the new Home State.

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