



January 13, 2026

***Historical context:*** *On Oct. 30, 2025 the OTCC voted to table this rule and send it back to the Rules Committee for further revisions. Those revisions were finalized, and the Executive Committee voted to move the revised draft forward to public comment for a second time. Those comments are compiled here.*

Re: Public Comments (compiled and summarized) regarding the draft rule on *Converting a Privilege to Practice to Home State License (PtP to HSL) (revised from original version)*

Comment period: December 12, 2025 – January 12, 2026

- **Comments on draft rule on *Converting a Privilege to Practice to a Home State License (PtP to HSL)***
  1. No public comments were received during this public comment period.

**Historical context:** *The public comments listed here are from the original/first public comment period. After this public comment period, the OTCC voted to table this rule and send it back to the Rules Committee for further revisions based on the feedback received during the Oct. 30, 2025 OTCC meeting.*

September 2025

Re: Public Comments (compiled and summarized) regarding the draft rule on *Converting a Privilege to Practice to Home State License (PtP to HSL)*

Comment period: August 18 – September 19, 2025

- **Comments on draft rule on *Converting a Privilege to Practice to a Home State License (PtP to HSL)***

1. Submitted by West Virginia Board of Occupational Therapy (9.16.25):

- The WV Board of Occupational Therapy (WVBOT) has reviewed the proposed Rule on Converting a Privilege to Practice to a Home State License and offers the following comments. [references] Section 4: Rule Content – A Member State Shall: Conduct FBI CBC in accordance with state statute and Public Law 92-544. The Compact Legislation related to this section includes the phrase, *“if not previously performed or updated pursuant to the applicable rules adopted by the commission”*.
- The OTCC Rule on Implementation of FBI CBC Requirements states in Section 4.4.1.A, *“The Home state must implement or utilize procedures for considering the criminal history records of applicants for a compact privilege to practice who are licensed within their Home state **and who are applying for their initial, e.g., very first time, privilege to practice in one or more states under the OT Compact.**”*
- WV State law only requires an FBI CBC for licensees wishing to participate in the OT Compact. We believe this rule needs to provide better clarification as to when an FBI CBC is required for licensees moving between compact member states.
- Thank you for the opportunity to review and offer input on this Rule.
  - OTCC Rules Committee Response (9.23.25): Thank you for this comment. This rule pertains to movement to a new home state. That home state’s requirements are applicable to performing an FBI CBC. The OTCC has not yet created a rule to define the frequency under which privilege holders must submit to an FBI CBC.

2. Submitted by W. Winistorfer, MPA, OTR, FAOTA (9.17.25)

- I fully support this rule as I believe it will facilitate the mobility of occupational therapy practitioners when moving among states. I personally know that delays occur in receiving a new license when a practitioner establishes a new home residence, in a new state. I know it is not unusual for occupational therapy practitioners, who may practice in two contiguous states (currently with a license in both states) to move their home residence across a state line. (This often occurs in Wisconsin in the suburban regions bordering the Twin Cities of Minnesota and the Chicago Metro area.) The OT Compact



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is the tool that should facilitate practice in more than one jurisdiction at a time. The PtP to HSL Rule is a logical approach!

- OTCC Rules Committee Response (9.23.25): Thank you for your comment.