



**Occupational Therapy Compact Commission  
Rules Committee Meeting  
Minutes: January 20, 2026**

Member	Attendance	VOTES					
		Agenda	Minutes	PtP to HSL Rule	Dispute Resolut.	No item	Adjourn
Claire Covert-Bybee, Chair	P	Y	Y	Y	Y	---	---
Adrienne Price	A	---	---	---	---	---	---
Vanessa Beauchamp	P	Y	Y	Y	Y	---	---
Teri Black	P	Y	Y	Y	Y	---	---
Dr. Van Culotta	A	---	---	---	---	---	---
<b>TOTALS</b>	<b>3/5 voting members; quorum present</b>	3/3 motion carries	3/3 motion carries	3/3 motion carries	3/3 motion carries	---	Meeting adjourned via acclimation at 3:41p CST

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

### **Welcome/Call to Order**

- Chair C. Covert-Bybee called the meeting to order at 2:34p CT.

### **Roll Call**

- A. Perry called the roll; quorum was present; attendance reflected in chart above.
  - 3/5 voting members present at roll call

### **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.**
  - **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.**
  - **All voted in favor; 0 abstained; the motion carried.**

### **Privilege to Practice to Home State License Rule Revisions (PtP to HSL) Public Comment Response**

- Chair Covert-Bybee explained that the OTCC did not receive any public comments regarding the revisions to the PtP to HSL rule. The public comment period was from December 12, 2025 – January 12, 2026.
- **Motion:**
  - **V. Beauchamp motioned to move the “Privilege to Practice to Home State License” draft rule forward to the Executive Committee with the recommendation to send it for a vote at the next OTCC meeting.**
  - **T. Black seconded the motion.**
  - **All voted in favor; no one abstained; motion carried.**

### **Member State Compliance and Dispute Resolution Rule**

- Chair Covert-Bybee explained that since the November 2025 Rules Committee meeting where the RC reviewed the Physical Therapy Compact’s (PTC) Compliance/Dispute Resolution rule, that A. Perry drafted a version of that rule to align with language used by the OTC.
- Counsel Kalfas also reviewed the draft prepared by A. Perry and made suggested edits for the RC’s consideration.
- During the RC meeting, A. Perry displayed the version with Counsel Kalfas’s suggested edits for the RC to discuss.
- The RC discussed the content of the draft rule as presented and determined to adopt the edits suggested by Counsel Kalfas.
- **Motion:**

- **V. Beauchamp motioned to approve the Member State Compliance / Dispute Resolution draft rule to Executive Committee for their consideration and approval.**
- **T. Black seconded the motion.**
- **All voted in favor; no one abstained; motion carried.**

#### **Legal Impossibility Approval Process**

- A. Perry explained that the Executive Committee charged the RC with drafting a formal process to approve states for the Legal Impossibility pathway to operationalize the OTC in states that have applied for and been denied an FBI ORI Number (Federal Bureau of Investigations Originating Agency Identifier).
- Counsel Kalfas explained that the existing process is for Legal Counsel to meet with the requesting state and review the FBI CBC Rule that contains the Legal Impossibility clause in it to determine if that state can provide the necessary supporting documentation.
  - Once the documentation is received, Legal Counsel will make a recommendation to the Executive Committee that the requesting state either be approved or denied based on the criteria in the rule.
- Counsel Kalfas suggested that this discussion be tabled so that she and A. Perry can draft a checklist of LI requirements based on the existing rule. Once that checklist is prepared, then the RC can revisit this discussion for a potential vote to formalize the process.
- Counsel Kalfas explained that she has only conducted one meeting with a state (VA) requesting the LI pathway, and now that she has done that, she can better create the checklist to inform the process.
- The RC members agreed to table this discussion. This was a tentative voting item on the agenda, so no formal motion was made; therefore no vote was taken.

#### **Questions and Comments**

- Chair Covert-Bybee called for additional questions and comments from the members and the public.
  - Member comments: A. Perry shared that 9 PtPs were sold since operationalizing and that a handful of states were on the cusp of accepting applications.
  - Public comments: F. Pineda thanked the Rules Committee for the hard work in advancing the OTC.

#### **Adjournment**

- Hearing no further discussion, Chair Covert-Bybee adjourned the meeting via acclamation at 3:41p CT with no opposition from the members.
- **Next Meeting: February 17, 2026**