



Occupational Therapy Compact Commission
Executive Committee Meeting Minutes
February 9, 2026

Name	Member Role	Attendance
1. Lesly James	Chair	P
2. Teri Black	Vice Chair	P
3. Christina Bourland	Secretary	P
4. Danielle Ward	Treasurer	P <small>Joined at 1:09p CT</small>
5. Missy Anthony	Member at Large	P
6. Vanessa Beauchamp	Member at Large	P <small>Joined at 1:34p CT</small>
7. Venus Vendoures-Walsh	Member at Large	P
Total voting members present		7/7 = quorum present
Barbara Williams	Ex-Officio – NBCOT	P
Chuck Willmarth	Ex-Officio – AOTA	P
Name	Non-Member Role	Attendance
Nahale Kalfas	OTCC Legal Counsel	P
Amanda Perry	OTCC Executive Director	P
Katie Schlesinger	OTCC Project Manager	P

Name	Agenda	Minutes from previous EC meeting	PtP to HSL	Draft Rule on Default, Non-Compliance, & Dispute Resolution	Virginia Legal Impossibility Inquiry	Adjourn
L. James	Y	Y	Y	Y	Y	Via Acclimation at 2:10p CT
V. Beauchamp	---	---	---	---	Motion – Y	
D. Ward	---	---	Second – Y	Y	Y	
M. Anthony	Y	Second – Y	Motion – Y	Motion – Y	Second – Y	
T. Black	Motion – Y	Y	Y	Second – Y	Y	
C. Bourland	Second – Y	Motion – Y	Y	Y	Y	
V. Vendoures-Walsh	Y	Y	Y	Y	Y	
TOTALS	5/5 motion passes	5/5 motion passes	6/6 motion passes	6/6 motion passes	7/7 motion passes	

--- indicates member was absent, or unable to cast a vote (ex: technical difficulties), or there was no voting item for that column.

Welcome/Call to Order

- Chair L. James called the meeting to order at 1:03p CT

Roll Call

- A. Perry called the roll.
 - 5/7 voting members present at initial roll call
 - 2 members joined late
 - Attendance reflected in chart above

Review and Adopt Agenda

- Chair James reviewed the agenda and called for a motion to approve it or amend it.
- **Motion:**
 - **T. Black motioned to adopt the agenda as presented.**
 - **C. Bourland seconded the motion.**
 - **All voted in favor; 0 abstained; motion carried.**

Review and Adoption of Meeting Minutes from last Executive Committee Meeting

- The committee reviewed the draft minutes from the last EC meeting.
- Chair James called for a motion to adopt or amend the draft minutes.
- **Motion:**
 - **C. Bourland motioned that the committee adopt the minutes as presented.**
 - **M. Anthony seconded the motion.**
 - **All voted in favor; 0 abstained; motion carried.**

Privilege to Practice to Home State License (PtP to HSL) – voting item

- A. Perry provided a history of the rule as documented through the initial draft to this draft.
- Counsel Kalfas explained that this rule did not receive any public comments during the public comment period from December 2025 – January 2026.
- Chair James asked the EC members if they had any discussion, comments, or questions regarding the rule.
 - None noted
- Chair James called for a motion to move the draft rule forward to a vote by the OTCC in the spring Annual Commission meeting.
- **Motion:**
 - **M. Anthony motioned that the committee vote to move the draft *Privilege to Practice to Home State License (PtP to HSL)* rule forward to a vote at the next full OTCC meeting.**
 - **D. Ward seconded the motion.**
 - **All voted in favor; 0 abstained; motion carried.**

Draft Rule on Member State Default, Non-Compliance, and Dispute Resolution – voting item

- Counsel Kalfas provided an overview of this draft rule explaining that it amplifies what already exists in OTC legislation passed by each member state.
- Q: Are state disagreements common in other licensure compacts?

- A: No. They are not common. Most have been minor issues related to timely reporting. Habitual concerns have been addressed. None has led to litigation between states.
- Q: Does the OTCC have money set aside for litigation?
 - A: Not currently. That is a goal with revenue generation as more states operationalize. There is language in the rule that addresses state-to-state disputes and that the states are responsible for those expenses.
- Clarification: This rule is strictly applicable to language in OTC law and rule as applicable to member states. It does not allow for independent or private party litigation.
- Q: How is the OTC vetting states' legislation before it is passed to join the OTC? If it is not, should there be a policy or rule related to this compliance?
 - A: AOTA and NBCOT work closely with CSG to review proposed legislation in states that are seeking to join the OTC. Substantive changes are reviewed and addressed before the legislation is introduced in the state. Caveat that state legislatures can pass whatever laws they want to, but the OTC does not have to allow them to operationalize if their law does not align with the intent and purpose of the model OTC language.
 - A: This has not been a concern thus far in 32 states. A policy is not necessary since language is vetted ahead of states passing the law. Can revisit this if necessary, in the future.
- **Motion:**
 - **M. Anthony motioned to move the draft rule on *Member State Default, Non-Compliance, and Dispute Resolution* forward to public comment.**
 - **T. Black seconded the motion.**
 - **All voted in favor; 0 abstained; motion carried.**

Virginia Legal Impossibility Pathway Inquiry

- Counsel Kalfas provided an overview of the State of Virginia's inquiry to utilize the OTCC's Legal Impossibility pathway to operationalize (open OTC applications) based on OTC Rule 4.4 and 4.5.
- Counsel Kalfas explained that she conducted an interview with staff in Virginia, and the following was determined:
 - Virginia has FBI CBC laws external of their OT Practice Act and the OT Compact that allows for CBCs; however, an ORI has been denied.
 - Virginia can conduct state CBCs on OT practitioners
 - Virginia meets the OTCC's Legal Impossibility requirements and falls under the Legal Impossibility doctrine
- Q: Does the LI pathway have a timeframe that it can be utilized? Or could states potentially utilize it for an indefinite period?
 - A: The OTCC Compliance Committee could determine a reasonable timeframe for states to utilize the LI pathway, but one does not currently exist. Should the OTCC set time limits it raises questions about what happens to PtPs issued during the approved time if a state runs out of time – this should be addressed if a timeframe is implemented.
 - A: Counsel Kalfas will require periodic check-ins with states who are approved to utilize the LI pathway to determine what forward steps are being taken to become compliant with the FBI CBC requirement.
 - A: The Share Act, if passed by Congress, will mitigate this concern.

- Q: Who is responsible for removing the Privilege(s) to Practice (PtP) of people who are not compliant with getting an FBI CBC once a state gains the ability to conduct FBI CBCs?
 - A: The Home State
- Q: Some states may have a lengthy (years+) process to remove a license or a PtP. Can the LI pathway be revised to allow remote states to conduct FBI CBCs?
 - A: No. OTC law does not give any authority to remote states to conduct FBI CBCs.
- Counsel Kalfas recommended that the Executive Committee approve Virginia's inquiry to utilize the OTCC's Legal Impossibility pathway to operationalize/open OTC applications.
- Q: Does the OTCC have to vote on this?
 - A: No. This falls in the category as a function of the Executive Committee to conduct business on behalf of the OTCC.
- **Motion:**
 - **V. Beauchamp motioned to approve the State of Virginia's inquiry to utilize the OTCC's Legal Impossibility pathway to operationalize the OT Compact based on the recommendation of Counsel Kalfas.**
 - **M. Anthony seconded the motion.**
 - **All voted in favor; 0 abstained; motion carried.**

Meeting Dates

- Executive Committee Meeting: March 9th meeting is rescheduled to March 16th at 1:00p CT
- OTCC Annual Meeting: May 6th at 9:00a CT

Questions and Comments

- Chair James opened the floor for further questions or comments from committee members.
 - K. Schlesinger provided an update regarding state onboarding/operationalizing
 - Two states likely will operationalize before the next EC meeting (IN and VA).
 - Some states are non-responsive; need help from AOTA and NBCOT for outreach to constituents; will work with C. Willmarth offline to organize outreach
 - No further comments from committee members
- Chair James opened the floor for public comments.
 - No members of the public were present

Meeting Closure

- **Motion:**
 - Meeting adjourned at 2:10p CT via acclamation.
 - Next EC meeting is March 16, 2026.