



November 6, 2023

Re: Public Comment Notice for Occupational Therapy Compact Commission (OTCC) Rule on Definitions

The OTCC welcomes public input on the proposed Rule on Definitions, which are designed to assist the OTCC in promulgating reasonable and lawful uniform rules to facilitate and coordinate implementation and administration of the Occupational Therapy Compact. 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 Definitions. 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 Definitions. 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 Definitions will be open for 30 days, starting from Wednesday, November 8, 2023, and closing on Friday, December 8, 2023. **All comments must be received by 5:00p.m. EST on Friday, December 8, 2023.**

**III. How to Submit Comments:**

Email your comments to [amanda@asmii.net](mailto:amanda@asmii.net). Please indicate "Public Comment for Rule on Definitions" 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:**

A public hearing on the proposed Rule on Definitions will be held on Thursday, January 11, 2024, virtually, via Zoom.

**V. Contact Information:**

If you have any questions or require further information regarding the proposed Rule on Definitions or this public comment process, please contact the OTCC Executive Director, Amanda Perry, at [Amanda@asmii.net](mailto:Amanda@asmii.net). 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,

DocuSigned by:

A handwritten signature in black ink that reads "Lesly James". The signature is written in a cursive style.

D6722FD4AEFE459 James, Chair

Occupational Therapy Compact Commission

**Occupational Therapy Compact (OT Compact)**  
**OT Compact Commission**

**Title of Rule:** Rule on Definitions

**Drafted:** March 28, 2023

**Meeting at which Rule will be discussed and voted on:** January 11, 2024 @ 11:00a.m. CST

**Public comment:** Interested persons may electronically submit written comments on the proposed rule to [amanda@asmii.net](mailto:amanda@asmii.net) with the subject line “OTCC rule comment” or by attending the meeting at which the rule will be discussed and voted on. Written comments on the proposed rule must be submitted by 2 pm ET the day before the meeting.

**Effective:** TBD (30 days from full commission approval)

**History for Rule:** March 28, 2023: Rule Introduced at Rules Committee Meeting.

April 18, 2023: Rule Approved as Amended at Rules Committee Meeting.  
Sent to Executive Committee for consideration.

May 1, 2023: Rule Introduced at Executive Committee Meeting.

May 8, 2023: Rule reviewed and approved for vote by full commission

---

**Chapter 1:** Rulemaking on Definitions

**Authority:** Section 2: Definitions, Subsections F and H

Section 8: Establishment of the OT Compact Commission

Section 10: Rulemaking

**1.0 Purpose:** Pursuant to Section 8.C.6 and Section 10, the OT Compact Commission shall promulgate reasonable and lawful uniform rules to facilitate and coordinate implementation and administration of the OT Compact. This rule will become effective upon passage by the OT Compact Commission as provided in Section 10 of the OT Compact.

**1.1 Definition(s):** (a) “Home State License” as distinguished from a single-state license means an active license issued without any encumbrance by the primary state of residence which allows the licensee to be eligible to become authorized to practice in all compact member states.

32  
33  
34  
35  
36  
37  
38  
39  
40  
41  
42  
43  
44  
45

**(b) “Initial Privilege to Practice”** means the eligibility of an Occupational Therapist (OT) or Occupational Therapy Assistant (OTA) to become authorized to practice in all member states upon the issuance of an unencumbered home state license in a state which is a member of the compact.

**(c) “Minor Infraction”** means an infraction not related to the practice of occupational therapy as determined by each state’s regulatory authority which will not prevent a licensee from retaining or renewing a home state license or privilege to practice and which does not result in an encumbered license or is not reportable to the National Practitioners Data Bank.

**(d) “Unencumbered License”** means a license issued to an Occupational Therapist (OT) or Occupational Therapy Assistant (OTA) that is currently in good standing and not restricted by any terms, conditions, limitations or sanctions attached to it or imposed by a state licensing board or authority.

DRAFT