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**VIRTUAL/TELECONFERENCE**  
**OCCUPATIONAL THERAPISTS AFFILIATED CREDENTIALING BOARD**  
**Virtual, 4822 Madison Yards Way, Madison**  
**Contact: Tom Ryan (608) 266-2112**  
**December 17, 2024**

*The following agenda describes the issues that the Board plans to consider at the meeting. At the time of the meeting, items may be removed from the agenda. Please consult the meeting minutes for a record of the actions of the Board.*

**AGENDA**

**9:30 A.M.**

**OPEN SESSION – CALL TO ORDER – ROLL CALL**

- A. Adoption of Agenda (1-3)**
- B. Approval of Minutes of September 17, 2024 (4)**
- C. Reminders: Conflicts of Interest, Scheduling Concerns
- D. Introductions, Announcements and Recognition
- E. Administrative Matters – Discussion and Consideration**
  - 1) Department, Staff and Board Updates
  - 2) Board Members – Term Expiration Dates
    - a. Black, Teresa L. – 7/1/2027
    - b. Donovan, Amber M. – 7/1/2027
    - c. Erickson, Terry – 7/1/2027
    - d. Hanson, Randi J. – 7/1/2027
    - e. Inda, Kari C. – 7/1/2026
    - f. Kearns, Christine – 7/1/2027
  - 3) Wis. Stat. s. 15.085(3)(b) – Biannual Meeting with the Medical Examining Board
- F. Legislative and Policy Matters – Discussion and Consideration
- G. Administrative Rule Matters – Discussion and Consideration (5-19)**
  - 1) Final Rule Draft: OT 1 to 5, Relating to Implementation of the Occupational Therapy Licensure Compact **(5-16)**
  - 2) 2025 Wis. Stat. s. 227.29 Biennial Report to the Legislature **(17-18)**
  - 3) Pending or Possible Rulemaking Projects **(19)**
- H. Occupational Therapy (OT) Licensing Compact Report by Teresa Black – Discussion and Consideration (20-39)**

- I. Discussion and Consideration of Items Added After Preparation of Agenda:
- 1) Introductions, Announcements and Recognition
  - 2) Administrative Matters
  - 3) Election of Officers
  - 4) Appointment of Liaisons and Alternates
  - 5) Delegation of Authorities
  - 6) Education and Examination Matters
  - 7) Credentialing Matters
  - 8) Practice Matters
  - 9) Legislative and Policy Matters
  - 10) Public Health Emergencies
  - 11) Administrative Rule Matters
  - 12) Liaison Reports
  - 13) Board Liaison Training and Appointment of Mentors
  - 14) Informational Items
  - 15) Division of Legal Services and Compliance (DLSC) Matters
  - 16) Presentations of Petitions for Summary Suspension
  - 17) Petitions for Designation of Hearing Examiner
  - 18) Presentation of Stipulations, Final Decisions and Orders
  - 19) Presentation of Proposed Final Decisions and Orders
  - 20) Presentation of Interim Orders
  - 21) Petitions for Re-Hearing
  - 22) Petitions for Assessments
  - 23) Petitions to Vacate Orders
  - 24) Requests for Disciplinary Proceeding Presentations
  - 25) Motions
  - 26) Petitions
  - 27) Appearances from Requests Received or Renewed
  - 28) Speaking Engagements, Travel, or Public Relation Requests, and Reports

**J. Public Comments**

**CONVENE TO CLOSED SESSION to deliberate on cases following hearing (s. 19.85(1)(a), Stats.); to consider licensure or certification of individuals (s. 19.85(1)(b), Stats.); to consider closing disciplinary investigations with administrative warnings (ss. 19.85(1)(b), and 440.205, Stats.); to consider individual histories or disciplinary data (s. 19.85(1)(f), Stats.); and to confer with legal counsel (s. 19.85(1)(g), Stats.).**

- K. Deliberation of Items Added After Preparation of the Agenda
- 1) Education and Examination Matters
  - 2) Credentialing Matters
  - 3) DLSC Matters
  - 4) Monitoring Matters
  - 5) Professional Assistance Procedure (PAP) Matters
  - 6) Petitions for Summary Suspensions
  - 7) Petitions for Designation of Hearing Examiner
  - 8) Proposed Stipulations, Final Decisions and Order
  - 9) Proposed Interim Orders
  - 10) Administrative Warnings
  - 11) Review of Administrative Warnings
  - 12) Proposed Final Decisions and Orders

- 13) Matters Relating to Costs/Orders Fixing Costs
- 14) Case Closings
- 15) Board Liaison Training
- 16) Petitions for Assessments and Evaluations
- 17) Petitions to Vacate Orders
- 18) Remedial Education Cases
- 19) Motions
- 20) Petitions for Re-Hearing
- 21) Appearances from Requests Received or Renewed

L. Consulting with Legal Counsel

**RECONVENE TO OPEN SESSION IMMEDIATELY FOLLOWING CLOSED SESSION**

- M. Vote on Items Considered or Deliberated Upon in Closed Session if Voting is Appropriate
- N. Open Session Items Noticed Above Not Completed in the Initial Open Session
- O. Delegation of Ratification of Examination Results and Ratification of Licenses and Certificates

**ADJOURNMENT**

**NEXT MEETING: MARCH 11, 2025**

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**ORAL INTERVIEW OF CANDIDATES FOR LICENSURE  
VIRTUAL/TELECONFERENCE**

**10:30 A.M. OR IMMEDIATELY FOLLOWING FULL BOARD MEETING**

**CLOSED SESSION** – Reviewing Applications and Conducting Oral Interviews of **Zero (0)** (at the time of agenda publication) Candidates for Licensure and Any Additional Examinations  
Added After Agenda Preparation – Teresa Black

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**MEETINGS AND HEARINGS ARE OPEN TO THE PUBLIC, AND MAY BE CANCELLED WITHOUT NOTICE.**

Times listed for meeting items are approximate and depend on the length of discussion and voting. All meetings are held virtually unless otherwise indicated. In-person meetings are typically conducted at 4822 Madison Yards Way, Madison, Wisconsin, unless an alternative location is listed on the meeting notice. In order to confirm a meeting or to request a complete copy of the board’s agenda, please visit the Department website at <https://dps.wi.gov>. The board may also consider materials or items filed after the transmission of this notice. Times listed for the commencement of any agenda item may be changed by the board for the convenience of the parties. The person credentialed by the board has the right to demand that meeting at which final action may be taken against the credential be held in open session. Requests for interpreters for the hard of hearing, or other accommodations, are considered upon request by contacting the Affirmative Action Officer or reach the Meeting Staff by calling 608-267-7213.

**VIRTUAL/TELECONFERENCE  
OCCUPATIONAL THERAPISTS AFFILIATED CREDENTIALING BOARD  
MEETING MINUTES  
SEPTEMBER 17, 2024**

**PRESENT:** Teresa Black, Amber Donovan, Terrence Erickson, Randi Hanson, Kari Inda, Christine Kearns

**STAFF:** Tom Ryan, Executive Director; Jameson Whitney, Legal Counsel; Nilajah Hardin, Administrative Rules Coordinator; Ashley Sarnosky, Board Administration Specialist; and other Department staff

**CALL TO ORDER**

Teresa Black, Chairperson, called the meeting to order at 9:30 a.m. A quorum was confirmed with six (6) board members present.

**ADOPTION OF AGENDA**

**MOTION:** Randi Hanson moved, seconded by Kari Inda, to adopt the Agenda as published. Motion carried unanimously.

**APPROVAL OF MINUTES OF JUNE 11, 2024**

**MOTION:** Christine Kearns moved, seconded by Amber Donovan, to approve the Minutes of June 11, 2024, as published. Motion carried unanimously.

**9:30 A.M. PUBLIC HEARING – CLEARINGHOUSE RULE 24-050 ON OT 1 TO 5, RELATING TO IMPLEMENTATION OF OCCUPATIONAL THERAPY LICENSURE COMPACT**

**MOTION:** Christine Kearns moved, seconded by Terrence Erickson, to authorize the Chairperson to work with DSPS staff on responding to the Clearinghouse Report and drafting the Final Rule and Legislative Report for Clearinghouse Rule 24-050 (OT 1 to 5), Relating to Implementation of the Occupational Therapy Licensure Compact. Motion carried unanimously.

**DELEGATION OF RATIFICATION OF LICENSES AND CERTIFICATES**

**MOTION:** Randi Hanson moved, seconded by Christine Kearns, to delegate ratification of examination results to DSPS staff and to ratify all licenses and certificates as issued. Motion carried unanimously.

**ADJOURNMENT**

**MOTION:** Terrence Erickson moved, seconded by Amber Donovan, to adjourn the meeting. Motion carried unanimously.

The meeting adjourned at 10:38 a.m.

**State of Wisconsin  
Department of Safety & Professional Services**

**AGENDA REQUEST FORM**

<b>1) Name and title of person submitting the request:</b> Nilajah Hardin Administrative Rules Coordinator		<b>2) Date when request submitted:</b> 12/05/24 Items will be considered late if submitted after 12:00 p.m. on the deadline date which is 8 business days before the meeting	
<b>3) Name of Board, Committee, Council, Sections:</b> Occupational Therapists Affiliated Credentialing Board			
<b>4) Meeting Date:</b> 12/17/24	<b>5) Attachments:</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<b>6) How should the item be titled on the agenda page?</b> Administrative Rule Matters Discussion and Consideration 1. Final Rule Draft: OT 1 to 5, Relating to Implementation of the Occupational Therapy Licensure Compact 2. 2025 Wis. Stat. s. 227.29 Biennial Report to the Legislature 3. Pending or Possible Rulemaking Projects	
<b>7) Place Item in:</b> <input checked="" type="checkbox"/> Open Session <input type="checkbox"/> Closed Session	<b>8) Is an appearance before the Board being scheduled?</b> <i>(If yes, please complete <a href="#">Appearance Request</a> for Non-DSPS Staff)</i> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>9) Name of Case Advisor(s), if required:</b> N/A	
<b>10) Describe the issue and action that should be addressed:</b> Attachments: 1. OT 1 to 5 Legislative Report, Final Rule Draft, and EIA 2. 2025 227.29 Report 3. Rule Project Chart  Pending Rule Project Page: <a href="https://dsps.wi.gov/Pages/RulesStatutes/PendingRules.aspx">https://dsps.wi.gov/Pages/RulesStatutes/PendingRules.aspx</a>			
<b>11) Authorization</b>			
Signature of person making this request		12/05/24 Date	
Supervisor (if required)		Date	
Executive Director signature (indicates approval to add post agenda deadline item to agenda)    Date			
<b>Directions for including supporting documents:</b> 1. This form should be attached to any documents submitted to the agenda. 2. Post Agenda Deadline items must be authorized by a Supervisor and the Policy Development Executive Director. 3. If necessary, provide original documents needing Board Chairperson signature to the Bureau Assistant prior to the start of a meeting.			

**STATE OF WISCONSIN  
OCCUPATIONAL THERAPISTS AFFILIATED CREDENTIALING BOARD**

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**IN THE MATTER OF RULEMAKING** :  
**PROCEEDINGS BEFORE THE** : **REPORT TO THE LEGISLATURE**  
**OCCUPATIONAL THERAPISTS** : **CR 24-050**  
**AFFILIATED CREDENTIALING** :  
**BOARD** :

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**I. THE PROPOSED RULE:**

The proposed rule, including the analysis and text, is attached.

**II. REFERENCE TO APPLICABLE FORMS: N/A**

**III. FISCAL ESTIMATE AND EIA:**

The Fiscal Estimate and EIA is attached.

**IV. DETAILED STATEMENT EXPLAINING THE BASIS AND PURPOSE OF THE PROPOSED RULE, INCLUDING HOW THE PROPOSED RULE ADVANCES RELEVANT STATUTORY GOALS OR PURPOSES:**

The Occupational Therapists Affiliated Credentialing Board conducted a comprehensive evaluation of its rules to implement the Occupational Therapy Licensure Compact to ensure clarity and consistency with applicable Wisconsin statutes. The following updates were made:

- Created definitions of “occupational therapist,” “occupational therapist assistant,” and “occupational therapy.”
- Created definitions of “compact,” “compact privilege,” and identify the requirements for obtaining a compact privilege, including a requirement that an individual seeking a compact privilege successfully complete a jurisprudence examination.
- Created a definition of a “health care provider” to include an occupational therapist or an occupational therapy assistant licensed under ch. 448 who holds a compact privilege under subch. XII of ch. 448.
- Amended the definition of “supervisor” to specify it includes a person holding an occupational therapist compact privilege granted by the Board but does not include a person holding a temporary license.
- Amended the unprofessional conduct requirements in s. OT 5.02 to also apply to those licensed under compact privileges as needed.

**V. SUMMARY OF PUBLIC COMMENTS AND THE BOARD’S RESPONSES, EXPLANATION OF MODIFICATIONS TO PROPOSED RULES PROMPTED BY PUBLIC COMMENTS:**

The Occupational Therapists Affiliated Credentialing Board held a public hearing on September 17, 2024. There were no comments submitted. However, Chairperson Teresa Black recommended to the Board that the Adjacent State Analysis be updated to reflect the current compact status of each state. The Board has made the changes as recommended.

Pursuant to s. 15.085 (5) (b), Stats., the Medical Examining Board reviewed the proposed rule on April 17, 2024 and made no comments or recommendations.

**VI. RESPONSE TO LEGISLATIVE COUNCIL STAFF RECOMMENDATIONS:**

All of the recommendations suggested in the Clearinghouse Report have been accepted in whole.

**VII. REPORT FROM THE SBRRB AND FINAL REGULATORY FLEXIBILITY ANALYSIS: N/A**

DRAFT

STATE OF WISCONSIN  
OCCUPATIONAL THERAPISTS AFFILIATED CREDENTIALING BOARD

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IN THE MATTER OF RULEMAKING	:	PROPOSED ORDER OF THE
PROCEEDINGS BEFORE THE	:	OCCUPATIONAL THERAPISTS
OCCUPATIONAL THERAPISTS	:	AFFILIATED CREDENTIALING
AFFILIATED CREDENTIALING	:	BOARD
BOARD	:	ADOPTING RULES
	:	(CLEARINGHOUSE RULE 24-050)

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PROPOSED ORDER

An order of the Occupational Therapists Affiliated Credentialing Board to amend OT 1.01 , 2.01, 2.03 (2) (e), 4.03 (2), (3) (f) and (g), and (4 ) (d), 5.02 (3), (4), (5), (6), (8), (9), (12), and (15) and create 1.02 (6g), (6r), (14e), (11m), (14m), (14s), (27), 2.09 and 3.03 (3) (Note), relating to implementation of the Occupational Therapy Licensure Compact.

Analysis prepared by the Department of Safety and Professional Services.

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ANALYSIS

**Statutes interpreted:** Subchapter XII of ch. 448, Stats.

**Statutory authority:** Sections 15.085 (5) (b), 227.11 (2) (a) (intro.), and 448.9875 (3), Stats.

**Explanation of agency authority:**

Section 15.085 (5) (b), Stats., provides that each affiliated credentialing board “[s]hall promulgate rules for its own guidance and for the guidance of the trade or profession to which it pertains, and define and enforce professional conduct and unethical practices not inconsistent with the law relating to the particular trade or profession.”

Section 227.11 (2) (a) (intro.), Stats., provides that “each agency may promulgate rules interpreting the provisions of any statute enforced or administered by the agency, if the agency considers it necessary to effectuate the purpose of the statute, but a rule is not valid if the rule exceeds the bounds of correct interpretation...”

Section 448.9875 (3), Stats., provides that “[t]he examining board may, by rule, require an individual seeking a compact privilege to meet a jurisprudence requirement in accordance with s. 448.987 (4) (a) 9., if such a requirement is imposed by the examining board under s. 448.964 in order to obtain a license under s. 448.963.”

**Related statute or rule:** Wisconsin Administrative Code Section OT 2.03

**Plain language analysis:**



The Occupational Therapists Affiliated Credentialing Board conducted a comprehensive evaluation of its rules to implement the Occupational Therapy Licensure Compact to ensure clarity and consistency with applicable Wisconsin statutes. The following updates were made:

- Created definitions of “occupational therapist,” “occupational therapist assistant,” and “occupational therapy.”
- Created definitions of “compact,” “compact privilege,” and identify the requirements for obtaining a compact privilege, including a requirement that an individual seeking a compact privilege successfully complete a jurisprudence examination.
- Created a definition of a “health care provider” to include an occupational therapist or an occupational therapy assistant licensed under ch. 448 who holds a compact privilege under subch. XII of ch. 448.
- Amended the definition of “supervisor” to specify it includes a person holding an occupational therapist compact privilege granted by the Board but does not include a person holding a temporary license.
- Amended the unprofessional conduct requirements in s. OT 5.02 to also apply to those licensed under compact privileges as needed.

**Summary of, and comparison with, existing or proposed federal regulation:** None.

**Summary of public comments received on statement of scope and a description of how and to what extent those comments and feedback were taken into account in drafting the proposed rule:** N/A.

**Comparison with rules in adjacent states:**

**Illinois:** Illinois has applied, but is not yet a member state of the Occupational Therapy Licensure Compact.

**Iowa:** Iowa is a member state of the Occupational Therapy Licensure Compact. Rules of the Iowa Board of Physical and Occupational Therapy address issuing a compact privilege and the practice of Occupational Therapy under a compact privilege [645 Iowa Administrative Code Section 200.3].

**Michigan:** Michigan has applied, but is not yet a member state of the Occupational Therapy Licensure Compact.

**Minnesota:** Minnesota is a member state of the Occupational Therapy Licensure Compact. Minnesota Statutory requirements for Occupational Therapy include issuing compact privileges and practice of Occupational Therapy under a compact privilege [2024 Minnesota Statutes Section 148.645]

**Summary of factual data and analytical methodologies:**

The proposed rules were developed by reviewing subch. XII of ch. 448, Stats., which ratifies the Occupational Therapy Licensure Compact, and conducting a comprehensive evaluation and update of the Occupational Therapy Examining Board’s rules to implement the Compact.

**Analysis and supporting documents used to determine effect on small business or in preparation of economic impact analysis:**

The proposed rule was posted for a period of 14 days to solicit public comment on economic impact, including how the proposed rules may affect businesses, local government units, and individuals. No comments were received.

**Fiscal Estimate and Economic Impact Analysis:**

The Fiscal Estimate and Economic Impact Analysis is attached.

**Effect on small business:**

These proposed rules do not have an economic impact on small businesses, as defined in s. 227.114 (1), Stats. The Department’s Regulatory Review Coordinator may be contacted by email at Jennifer.Garrett@wisconsin.gov, or by calling (608) 266-2112.

**Agency contact person:**

Nilajah Hardin, Administrative Rules Coordinator, Department of Safety and Professional Services, Division of Policy Development, P.O. Box 8366, Madison, Wisconsin 53708-8366; email at DSPSAdminRules@wisconsin.gov.

**Place where comments are to be submitted and deadline for submission:**

Comments may be submitted to Nilajah Hardin, Administrative Rules Coordinator, Department of Safety and Professional Services, Division of Policy Development, P.O. Box 8366, Madison, Wisconsin 53708-8366, or by email to DSPSAdminRules@wisconsin.gov. Comments must be received on or before the public hearing, held on September 17, 2024, to be included in the record of rule-making proceedings.

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TEXT OF RULE

SECTION 1. OT 1.01 is amended to read:

**OT 1.01** The rules in this chapter are adopted by the occupational therapists affiliated credentialing board pursuant to the authority of ss. 15.08 (5) (b), 227.11 (2), ~~and~~ 448.965, and 448.9875 (3), Stats., to govern the license and regulation of occupational therapists and occupational therapy assistants.

SECTION 2. OT 1.02 (6g), (6r), (11m), (14e), (14m), (14s) and (27) are created to read:

**OT 1.02 (6g)** “Compact” means the occupational therapy licensure compact under s. 448.987, Stats.

**(6r)** “Compact privilege” has the meaning given in s. 448.987 (2) (d), Stats.

**(11m)** “Health care provider” has the meaning given in s. 155.01 (7), Stats.

**(14e)** “Occupational therapist” has the meaning given in s. 448.96 (4), Stats.

(14m) “Occupational therapy assistant” has the meaning given in s. 448.96 (6), Stats.

(14s) “Occupational therapy compact commission” or “commission” has the meaning given in s. 448.987 (2) (s), Stats.

(27) “Supervisor” means a person holding a regular license under subchapter VII of chapter 448, Stats., or a person holding a compact privilege granted by the board, who is competent to coordinate, direct, and inspect the practice of another person engaged in or assisting in the practice of occupational therapy. This definition does not apply to a person holding a temporary license issued under ch. OT 2.

SECTION 3. OT 2.01 and 2.03 (2) (e) are amended to read:

**OT 2.01 Authority and Purpose.** The rules in this chapter are adopted by the board under the authority of ss. 15.085 (5) (b), 227.11 (2) ~~and 448.965 and 448.9875 (3)~~, Stats., to govern the licensure and regulation of occupational therapists and occupational therapy assistants.

**2.03 (2) (e)** Has not practiced occupational therapy for a period of 5 years prior to application, unless the applicant has graduated from a school of occupational therapy within that period. Practice for the purposes of this paragraph includes direct client treatment and education, occupational therapy instruction in an occupational therapy academic program recognized by the board, occupational therapy research, and service in administrative positions for healthcare ~~providers~~ entities or governmental bodies with responsibility relating to occupational therapy.

SECTION 4. OT 2.09 is created to read:

**OT 2.09 Compact privilege requirements.** Each person applying for a compact privilege shall meet all of the following requirements:

- (1) Complete the compact application process .
- (2) The fee specified in s. 448.987 (3) (c), Stats.
- (3) Successfully pass the examinations specified in s. OT 2.03 (1).

**Note:** Application instructions for compact privilege may be obtained from the Department of Safety and Professional Services’ website at <http://dsps.wi.gov>.

SECTION 5. OT 3.03 (Note) is created to read:

**OT 3.03 (3) (Note)** Application instructions for renewal may be obtained from the Department of Safety and Professional Services’ website at <http://dsps.wi.gov>.

SECTION 6. OT 4.03 (2), (3)(f) and (g), and (4) (d) are amended to read:

**OT 4.03 (2) REFERRALS.** Referrals may be accepted from advanced practice nurses, chiropractors, dentists, optometrists, physical therapists, physicians, physician assistants, podiatrists, psychologists, or other health care ~~professionals~~ providers.

- (3) (f) Evaluation results shall be communicated to the referring health care ~~professional~~ provider, if any, and to the appropriate persons in the facility and community.

(g) If the results of the evaluation indicate areas that require intervention by other health care ~~professionals~~ providers, the individual shall be appropriately referred or an appropriate consultation shall be requested.

(4) (d) In developing the program, the occupational therapist alone or in collaboration with the occupational therapy assistant shall also collaborate as appropriate, with the individual, family, other health care ~~professionals~~ providers and community resources; shall select the media, methods, environment, and personnel needed to accomplish the goals; and shall determine the frequency and duration of occupational therapy interventions provided.

SECTION 7. OT 5.02 (3), (4), (5), (6), (8), (9), (12), and (15) are amended to read:

- (3) Knowingly making or presenting or causing to be made or presented any false, fraudulent, or forged statement, writing, certificate, diploma, or other item in connection with any application for license or compact privilege.
- (4) Practicing fraud, forgery, deception, collusion, or conspiracy in connection with any examination for license or compact privilege.
- (5) Giving, selling, buying, bartering, or attempting to give, sell, buy, or barter any license or compact privilege.
- (6) Engaging or attempting to engage in practice under any license or compact privilege under any given name or surname other than that under which originally licensed, ~~or registered,~~ or granted compact privilege to practice in this or any other state
- (8) Practicing or attempting to practice under any license or compact privilege when unable to do so with reasonable skill and safety to clients.
- (9) Practicing or attempting to practice under any license or compact privilege beyond the scope of that license or compact privilege.
- (12) Knowingly making any false statement, written or oral, in practicing under any license or compact privilege, with fraudulent intent; or obtaining or attempting to obtain any professional fee or compensation of any form by fraud or deceit.
- (15) Having a license, compact privilege, certificate, permit, registration, or other practice credential granted by another state or by any agency of the federal government to practice occupational therapy, which becomes limited, restricted, suspended, or revoked, or having been subject to other adverse action by the state licensing authority or by an agency of the federal government including the denial or limitation of an original credential, or the surrender of a credential, whether or not accompanied by findings of negligence or unprofessional conduct.

SECTION 8. EFFECTIVE DATE. The rules adopted in this order shall take effect on the first day of the month following publication in the Wisconsin Administrative Register, pursuant to s. 227.22 (2) (intro.), Stats.

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(END OF TEXT OF RULE)  
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This Proposed Order of the Occupational Therapists Affiliated Credentialing Board is approved for submission to the Governor and Legislature.

Dated \_\_\_\_\_

Agency \_\_\_\_\_

Chairperson  
Occupational Therapists Affiliated  
Credentialing Board

DRAFT

## ADMINISTRATIVE RULES Fiscal Estimate & Economic Impact Analysis

<b>1. Type of Estimate and Analysis</b> <input checked="" type="checkbox"/> Original <input type="checkbox"/> Updated <input type="checkbox"/> Corrected	<b>2. Date</b> June 18, 2024
<b>3. Administrative Rule Chapter, Title and Number (and Clearinghouse Number if applicable)</b> OT 1 to 5	
<b>4. Subject</b> Implementation of the Occupational Therapy Licensure Compact	
<b>5. Fund Sources Affected</b> <input type="checkbox"/> GPR <input type="checkbox"/> FED <input checked="" type="checkbox"/> PRO <input type="checkbox"/> PRS <input type="checkbox"/> SEG <input type="checkbox"/> SEG-S	<b>6. Chapter 20, Stats. Appropriations Affected</b> s. 20.165 (1) (g)
<b>7. Fiscal Effect of Implementing the Rule</b> <input type="checkbox"/> No Fiscal Effect <input type="checkbox"/> Increase Existing Revenues <input checked="" type="checkbox"/> Increase Costs <input type="checkbox"/> Decrease Costs <input checked="" type="checkbox"/> Indeterminate <input type="checkbox"/> Decrease Existing Revenues <input type="checkbox"/> Could Absorb Within Agency's Budget	
<b>8. The Rule Will Impact the Following (Check All That Apply)</b> <input type="checkbox"/> State's Economy <input checked="" type="checkbox"/> Specific Businesses/Sectors <input type="checkbox"/> Local Government Units <input type="checkbox"/> Public Utility Rate Payers <input type="checkbox"/> Small Businesses <b>(if checked, complete Attachment A)</b>	
<b>9. Estimate of Implementation and Compliance to Businesses, Local Governmental Units and Individuals, per s. 227.137(3)(b)(1).</b> \$0	
<b>10. Would Implementation and Compliance Costs Businesses, Local Governmental Units and Individuals Be \$10 Million or more Over Any 2-year Period, per s. 227.137(3)(b)(2)?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<b>11. Policy Problem Addressed by the Rule</b> These rules implement the statute changes from 2021 Wisconsin Act 123.	
<b>12. Summary of the Businesses, Business Sectors, Associations Representing Business, Local Governmental Units, and Individuals that may be Affected by the Proposed Rule that were Contacted for Comments.</b> N/A	
<b>13. Identify the Local Governmental Units that Participated in the Development of this EIA.</b> N/A	
<b>14. Summary of Rule's Economic and Fiscal Impact on Specific Businesses, Business Sectors, Public Utility Rate Payers, Local Governmental Units and the State's Economy as a Whole (Include Implementation and Compliance Costs Expected to be Incurred)</b> DSPS estimates a total of \$15,600 in one-time costs and \$10,000 in annual costs for staffing and an indeterminate one-time IT impact to implement the rule. The estimated one-time staffing need for .4 limited term employee (LTE) is for staff to undertake such tasks as sites and forms updates, training on new requirements, assisting with temporary increases in inquiries, and providing board guidance. The estimated annual staffing need for .1 full time employee (FTE) is to accommodate additional applications and legal processing due to the implementation of the compact. The one-time and annual estimated costs cannot be absorbed in the currently appropriated agency budget.	
<b>15. Benefits of Implementing the Rule and Alternative(s) to Implementing the Rule</b> The benefits of implementing this rule are that the Occupational Therapists Affiliated Credentialing Board's section of the Administrative Code will be aligned with Wisconsin State Statutes.	
<b>16. Long Range Implications of Implementing the Rule</b> The long range implications of implementing this rule is clear requirements for practicing occupational therapy in Wisconsin under compact privileges.	
<b>17. Compare With Approaches Being Used by Federal Government</b> None.	

## ADMINISTRATIVE RULES

### Fiscal Estimate & Economic Impact Analysis

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18. Compare With Approaches Being Used by Neighboring States (Illinois, Iowa, Michigan and Minnesota)  
Illinois: Illinois is not a member state of the Occupational Therapy Licensure Compact.

Iowa: Iowa is a member state of the Occupational Therapy Licensure Compact and is actively issuing compact privileges. Rules of the Iowa Board of Physical and Occupational Therapy address issuing a compact privilege and the practice of occupational therapy under a compact privilege [645 IAC 200.3].

Michigan: Michigan is not a member state of the Occupational Therapy Licensure Compact.

Minnesota: Minnesota is not a member state of the Occupational Therapy Licensure Compact.

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19. Contact Name

Nilajah Hardin, Administrative Rules Coordinator

20. Contact Phone Number

(608) 267-7139

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This document can be made available in alternate formats to individuals with disabilities upon request.

**ADMINISTRATIVE RULES**  
**Fiscal Estimate & Economic Impact Analysis**

**ATTACHMENT A**

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1. Summary of Rule's Economic and Fiscal Impact on Small Businesses (Separately for each Small Business Sector, Include Implementation and Compliance Costs Expected to be Incurred)

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2. Summary of the data sources used to measure the Rule's impact on Small Businesses

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3. Did the agency consider the following methods to reduce the impact of the Rule on Small Businesses?

- Less Stringent Compliance or Reporting Requirements
  - Less Stringent Schedules or Deadlines for Compliance or Reporting
  - Consolidation or Simplification of Reporting Requirements
  - Establishment of performance standards in lieu of Design or Operational Standards
  - Exemption of Small Businesses from some or all requirements
  - Other, describe:
- 

4. Describe the methods incorporated into the Rule that will reduce its impact on Small Businesses

---

5. Describe the Rule's Enforcement Provisions

---

6. Did the Agency prepare a Cost Benefit Analysis (if Yes, attach to form)

- Yes    No
-





December , 2024

Senator Stephen Nass, Senate Co-Chairperson  
Joint Committee for Review of Administrative Rules  
Room 10 South, State Capitol  
Madison, WI 53702

Representative Adam Neylon, Assembly Co-Chairperson  
Joint Committee for Review of Administrative Rules  
Room 204 North, State Capitol  
Madison, WI 53702

RE: Report Submitted in Compliance with s. 227.29 (1), Stats.

Dear Senator Nass and Representative Neylon:

This report has been prepared and submitted in compliance with s. 227.29 (1), Stats.

**I. Unauthorized rules, as defined in s. 227.26 (4) (a):**

After careful review of the Board's administrative rules, the Board has determined that no promulgated rules are unauthorized.

**II. Rules for which the authority to promulgate has been restricted:**

After careful review of the Board's administrative rules, the Board has determined that no promulgated rules have restricted authority.

**III. Rules that are obsolete or that have been rendered unnecessary:**

After careful review of the Board's administrative rules, the Board has determined that no promulgated rules are obsolete or have been rendered unnecessary.

**IV. Rules that are duplicative of, superseded by, or in conflict with another rule, a state statute, a federal statute or regulation, or a ruling of a court of competent jurisdiction:**

See below under "status of rules identified in the Board's previous report"

**V. Rules that are economically burdensome:**

After careful review of the Board's administrative rules, the Board has determined that no promulgated rules are economically burdensome.

**VI. Status of rules identified in the Board's previous report:**

<b>Rules</b>	<b>Citation or the text of the statute, regulation, or ruling</b>	<b>Action taken to address or reason for not taking an action</b>
OT 1 to 5	2021 Wisconsin Act 123 made changes to Wis. Stat. ch. 448 relating to the Occupational Therapy Licensure Compact	CR 24-050 will align OT 1 to 5 with the statutory changes from 2021 Wisconsin Act 123 once it has been published and is effective.

Sincerely,

Teresa Black  
Chairperson  
Occupational Therapists Affiliated Credentialing Board

DRAFT

**Occupational Therapists Affiliated Credentialing Board  
Rule Projects (updated 12/05/24)**

<b>Clearinghouse Rule Number</b>	<b>Scope #</b>	<b>Scope Expiration</b>	<b>Code Chapter Affected</b>	<b>Relating clause</b>	<b>Current Stage</b>	<b>Next Step</b>
N/A	072-22	02/22/2025	OT 1 to 5	Implementation of the Occupational Therapy Licensure Compact (Emergency Rule)	Emergency Rule Draft Approved by the Governor on 09/21/23; Rule Paused, Proceeding with Permanent Rule Only	N/A
24-050	072-22	02/22/2025	OT 1 to 5	Implementation of the Occupational Therapy Licensure Compact (Permanent Rule)	Final Rule and Legislative Report Reviewed at 12/17/24 Meeting	Submission for Governor's Office Approval and Legislative Review



# **FY2024 ANNUAL REPORT**

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**Occupational Therapy Compact Commission  
(OTCC)**

[www.OTCompact.org](http://www.OTCompact.org)  
201 Park Washington Ct.  
Falls Church, VA 22046

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# CHAIR MESSAGE

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**Lesly Wilson James,**  
PhD, MPA, PMP, OTR/L,  
FAOTA, FNAP

I am excited to present the **2024 OTCC Annual Report** which covers fiscal year 2024 (FY24) from October 1, 2023 – September 30, 2024. This report highlights the OTCC's progress, provides committee insights, and includes a list of states' statuses as related to their participation in the OT Compact (OTC).

Throughout this time, the dedicated State Commissioners have worked to ensure that thoughtful decision making remains the foundation of the OT Compact Commission (OTCC). This commitment, along with our legal counsel and executive director, has ensured the successful development of *CompactConnect*. This anticipated national data sharing system is unmatched. At times, the work seems daunting and thankless, but the conversations and collaborations have been ultimately very rewarding and are what has brought the OTC to life.

I would like to thank the Executive Committee and the following entities for their invaluable provisions with ongoing contributions to support the OT Compact and the OT Compact Commission: American Occupational Therapy Association (AOTA); National Board for Certification in Occupational Therapy (NBCOT); The Council of State Governments (CSG); and the Association and Society Management International (ASMI)

I have much excitement for what is to come in FY25!

Thoughtfully yours,  
*Dr. Lesly Wilson James*

Lesly Wilson James, PhD, MPA, PMP, OTR/L, FAOTA, FNAP  
Chair, Occupational Therapy Compact Commission



# OTCC PROFILE

The Occupational Therapy Compact Commission (OTCC) facilitates the interstate privileges-to-practice of occupational therapists and occupational therapy assistants. Public protection is the ultimate goal of the OTCC. It provides a mechanism that allows for legal, ethical, and regulated interstate practice.

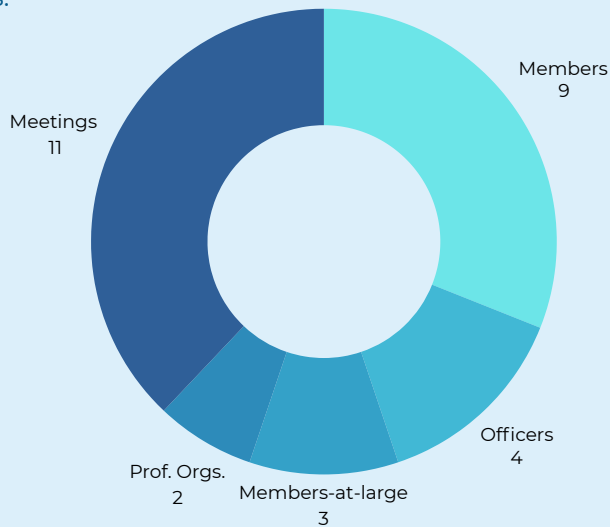
- Member states grant occupational therapists and occupational therapy assistants the privilege-to-practice.
- Increases access to safe, effective healthcare in underserved communities.
- Provides a means for military families to relocate with no interruption to their professions.

# EXECUTIVE COMMITTEE REVIEW

**Purpose of the Executive Committee:** The OTCC Executive Committee is empowered to act on behalf of the OTCC between Commission meetings, except for rule making or amendments of the compact. The power of the Executive Committee to act on behalf of the Commission shall be subject to the Bylaws, Rules, and provision of the Compact. The Executive Committee ensures that OT Compact administrative services are appropriately contracted for and provided.

## FY 2024

The OTCC Executive Committee (EC) consists of 9 members, 7 voting and 2 ex-officio. There are four officers: Chair, Vice-Chair, Secretary, and Treasurer, and there are 3 members-at-large. Between October 1, 2023 - September 30, 2024, the OTCC EC held 11 meetings. The elected members of the EC consist of commissioners appointed to the OTCC, and they serve the OTCC and the EC on volunteer basis as representatives of their respective states.



MEMBER	POSITION	STATE
<b>Lesly James</b>	Chair	SC
<b>Teri Black</b>	Vice Chair	WI
<b>Danielle Ward</b>	Treasurer	NC
<b>Renee Causey-Upton</b>	Secretary	KY
<b>Missy Anthony</b>	Member-at-large	OH
<b>Vanessa Beauchamp</b>	Member-at-large	MO
<b>Vacant</b>	Member-at-large	TBD
<b>Chuck Willmarth</b>	Ex-officio delegate	AOTA
<b>Shaun Conway</b>	Ex-officio delegate	NBCOT

## EC Recommendations to the OTCC

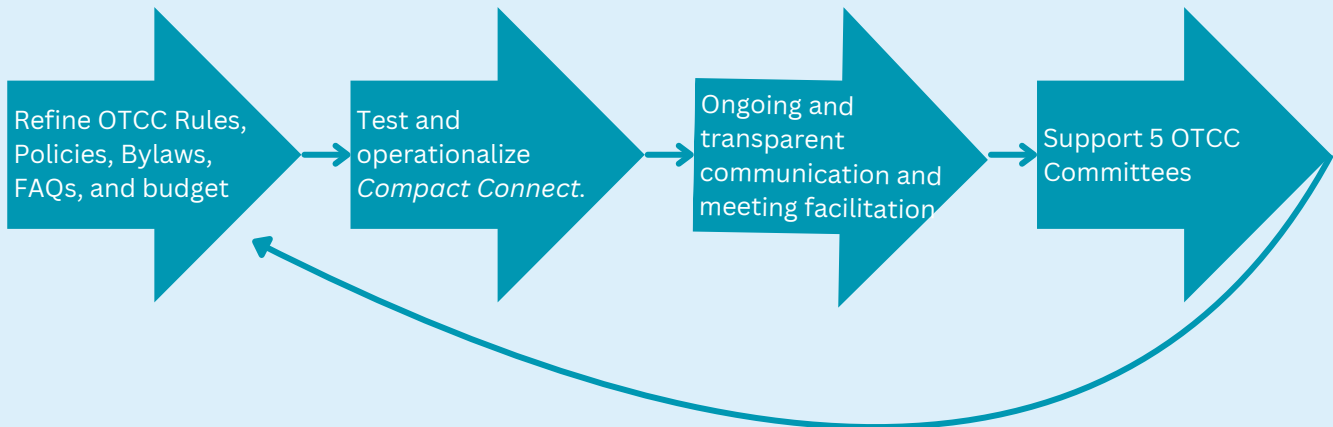
- Bylaw, Rule, or OTC Legislation changes
- Associated OTC fees (commission, state assessment)
- Fiscal Year Budgets, in consultation with the Finance Committee



# Executive Committee Accomplishments: 2023 - 2024 (FY24)

Three states joined the Compact in FY24, bringing the total number of OTC states to 31! The EC assisted in drafting of the RFP (request for proposals) to select a data system developer. They also conducted joint interviews to select the developer. An agreement between the joint compacts, Audiology & Speech-Language Pathology (ASLP), Counseling, and Occupational Therapy Compact (OTC), was executed in spring 2024, followed by their agreement with CSG, and finally with Inspiring Apps. In early summer 2024, Inspiring Apps officially started planning and developing *Compact Connect*. By the end of FY24, *Compact Connect* development was well under way having completed user stories, multiple sprints, and created administrator and practitioner dashboard templates. At the close of FY24 the OTCC Executive Committee casted vision for strategic planning and continued funding initiatives, with a bright outlook for FY25.

## Executive Committee FY25 Priorities



## FY25 Anticipated Timeline\*

### Quarter 1 (Oct - Dec 2024)

- Publish FY24 annual report
- Test *Compact Connect*
- Onboard pilot OTC states to *Compact Connect*

### Quarter 2 (Jan - Mar 2025)

- Determine adjustments to *Compact Connect*
- Make adjustments
- Retest *Compact Connect*
- Onboard more OTC states to *Compact Connect*

### Quarter 3 (Apr - Jun 2025)

- Hold OTCC Annual Business Meeting (virtual)
- Onboard more OTC states to *Compact Connect*
- Continue onboarding and testing

### Quarter 4 (Jul - Sep. 2025)

- Begin facilitating the process for states, which are prepared to onboard, to issue privileges to practice through *Compact Connect*
- Operationalize applications to OT/OTA practitioners
- Close out FY25
- Prepare for FY26

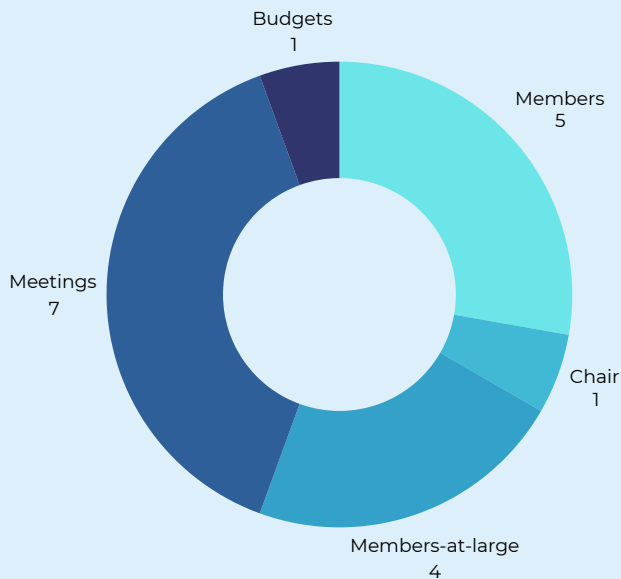
\*This is an estimated timeline and is subject to be adjusted as needed.

# FINANCE COMMITTEE REVIEW

**Purpose of the Finance Committee:** The OTCC Finance Committee provides fiscal oversight and ensures that the OTCC operates within its budget. The Finance Committee assists the OTCC in developing and managing financial resources to achieve its purposes.

## FY 2024

Throughout FY24 the OTCC Finance Committee was committed to ensuring financial accountability to the OTC and the OTCC. This occurred through regular and transparent financial check-ins and updates during each Finance Committee meeting, which are open to all OTCC Commissioners and the public to attend.



MEMBER	POSITION	STATE
<b>Danielle Ward</b>	Chair	NC
<b>Missy Anthony</b>	Member	OH
<b>Vonda Malnikoff</b>	Member	WV
<b>Renee Causey-Upton</b>	Member	KY
<b>Trent Gahl</b>	Member	MT

## FC Recommendations to the Executive Committee

- Associated OTC fees (commission, state assessment)
- Fiscal Year Budgets, including projections and expenses

# OTCC FY24 Financial Report

October 1, 2023 - September 30, 2024

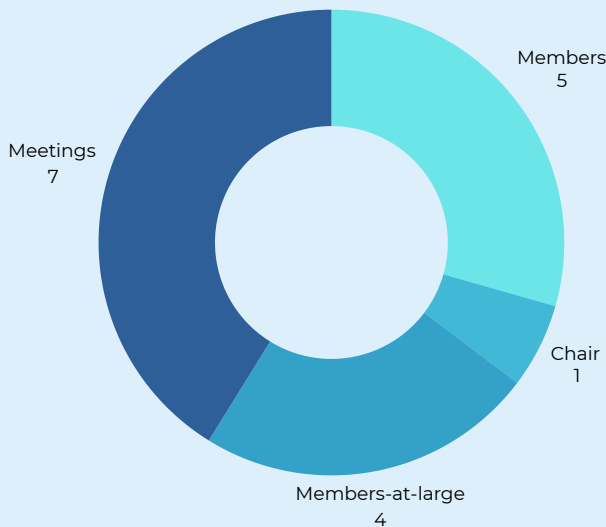
<b>EXPENSES</b>	
<b>Staff Support</b>	
Administrative Support Contract (ASMI)	\$150,000
<b>Communications</b>	
<ul style="list-style-type: none"> <li>Website maintenance</li> <li>Data System Maintenance and Hosting (CompactConnect)</li> </ul>	\$2,040.00
<b>Supplies and Equipment</b>	
<ul style="list-style-type: none"> <li>Office Supplies</li> <li>Software</li> </ul>	\$2261.13
<b>Other Expenses</b>	
<ul style="list-style-type: none"> <li>Insurance (E&amp;O, D&amp;O, Cyber Security)</li> <li>Legal and Professional Contractual Services</li> <li>IT Contractual Services (for development of CompactConnect)</li> <li>Travel</li> <li>Annual OTCC Business Meeting</li> </ul>	\$32,008.85
<b>Total Expenses</b>	<b>\$186,309.98</b>
<b>REVENUE</b>	
<ul style="list-style-type: none"> <li>AOTA Contributions</li> <li>NBCOT Contributions</li> <li>Cash balance roll over from FY23</li> </ul>	<b>\$413,308.28</b>

# PUBLIC RELATIONS COMMITTEE REVIEW

**Purpose of the Public Relations Committee:** The OTCC PR Committee is empowered to administer all general communication needs of the OT Compact and the OTCC. The PR Committee extends outreach to commissioners, administrators, media, and the public via regular updates on the OTCompact website.

## FY 2024

The Public Relations Committee added two new members to its roster in FY24, growing the capacity of the committee and increasing participation. These additions to the PRC bring new and different perspectives which allows the committee to approach outreach through a variety of lenses.



MEMBER	POSITION	STATE
<b>Chris Daly</b>	Chair	AZ
<b>Lesly James</b>	Member	SC
<b>Lise Faulise</b>	Member	RI
<b>Kathy Weed</b>	Member	WA
<b>Missy Anthony</b>	Member	OH

## PRC Recommendations to the Executive Committee

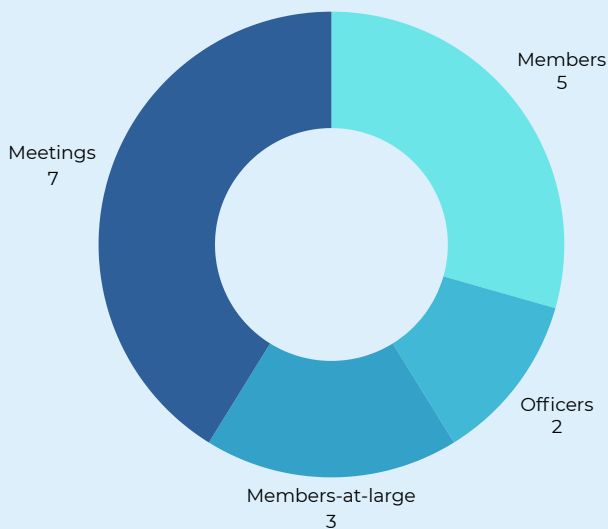
- Cadence and types of outreach
- Contents of quarterly and annual reports

# RULES COMMITTEE REVIEW

**Purpose of the Rules Committee:** The OTCC Rules Committee develops uniform Compact rules, bylaw amendments, and policies for consideration by the Executive Committee and the Commission. It encourages concurrent implementation of state legislation. The committee regularly reviews existing rules and recommends necessary changes to the Executive Committee and Commission for consideration.

## FY 2024

The Rules Committee was dedicated to ensuring timely drafting, construction, and recommendation of needed rules to the Executive Committee. This year's focus was aimed at preparation to implement *CompactConnect*, the national data system needed to operationalize the OT Compact across member states.



MEMBER	POSITION	STATE
<b>Claire Covert-Bybee</b>	Chair	NE
<b>Teri Black</b>	Vice Chair	WI
<b>Kathryn Skibek</b>	Member	WI
<b>Adrienne Price</b>	Member	GA
<b>Vanessa Beauchamp</b>	Member	MO

## RC Recommendations to the Executive Committee

- Rules and rule amendments
- Bylaw amendments
- Policies

## Occupational Therapy Compact

Date: **August 5, 2024**

Many factors can affect sustainability, such as financial and political climates, organizational characteristics, and elements of evaluation and communication. The **Program Sustainability Assessment Tool (PSAT)** allows stakeholders to rate their programs on the extent to which they have processes and structures in place that will increase the likelihood of sustainability. Assessment results can then be used to identify next steps in building program capacity for sustainability in order to position efforts for long term success.

### Interpreting the Results

The table presents the average rating for each sustainability domain based on the responses provided by 7 OTCC Executive Committee members. The remainder of the document presents the average ratings for indicators within each domain. There is no minimum rating that guarantees the sustainability of a program. However, lower ratings do indicate opportunities for improvement that a program may want to focus on when developing a plan for sustainability.

### Next Steps

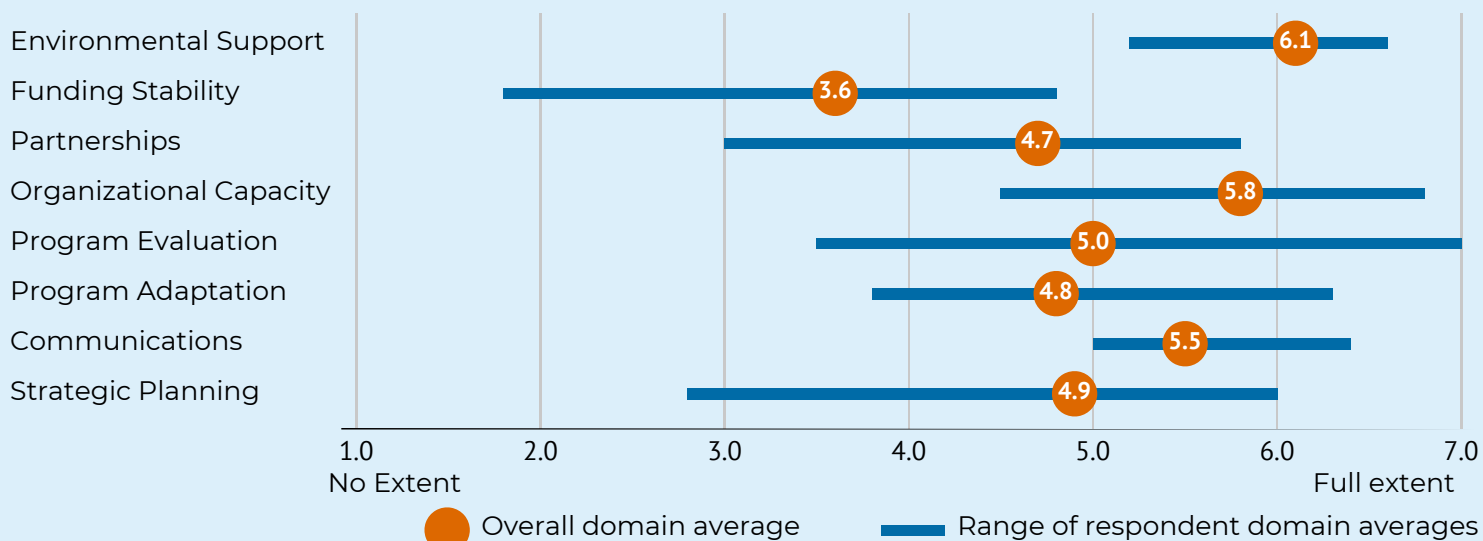
- These results can be used to guide sustainability planning for the program.
- Areas with lower ratings indicate that there is room for improvement.
- Address domains that are most modifiable, quicker to change, and have data available to support the needed changes.
- Develop strategies to tackle the domains that may be more difficult to modify.
- Make plans to assess the program's sustainability on an ongoing basis to monitor program changes as it strives for an ongoing impact.

Here is your sustainability score: **5.0**

Domain	Domain Score
Environmental Support	6.1
Funding Stability	3.6
Partnerships	4.7
Organizational Capacity	5.8
Program Evaluation	5.0
Program Adaptation	4.8
Communications	5.5
Strategic Planning	4.9

1 = program has this to no extent  
 7 = program has to the full extent  
 NA = not able to answer

### Average Sustainability Capacity By Domain



## Environmental Support

Champions exist who strongly support the program.	6.6
The program has strong champions with the ability to garner resources.	6.0
The program has leadership support from within the larger organization.	6.4
The program has leadership support from outside of the organization.	6.3
The program has strong public support.	5.0

## Partnerships

Diverse community organizations are invested in the success of the program.	4.6
Community leaders are involved with the program.	4.9
Community members are passionately committed to the program.	4.7
The program communicates with community leaders.	5.1
The community is engaged in the development of program goals.	4.1

## Program Evaluation

The program has the capacity for quality program evaluation.	5.0
The program reports short term and intermediate outcomes.	5.1
Evaluation results inform program planning and implementation.	4.8
Program evaluation results are used to demonstrate successes to funders and other interested parties.	5.0
The program provides strong evidence to the public successes to funders and other interested parties.	5.0

## Communications

The program has communication strategies to secure and maintain public support.	5.7
Program staff communicate the need for the program to the public.	5.1
The program is marketed in a way that generates interest.	6.0
The program increases community awareness of the issue.	5.4
The program demonstrates its value to the public.	5.3

## Funding Stability

The program exists in a supportive state economic climate.	3.6
The program implements policies to help ensure sustained funding.	4.3
The program is funded through a variety of sources.	3.7
The program has a combination of stable and flexible funding.	3.3
The program has sustained funding.	3.1

## Organizational Capacity

The program is well integrated into the operations of the organization.	5.5
Organizational systems are in place to support the various program needs.	5.4
Leadership effectively articulates the vision of the program to external partners.	6.1
Leadership efficiently manages staff and other resources.	6.6
The program has adequate staff to complete the program's goals.	5.3

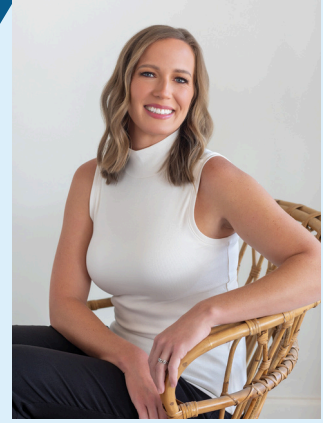
## Program Adaptation

The program periodically reviews the evidence base.	3.5
The program adapts strategies as needed.	5.6
The program adapts to new science.	4.3
The program proactively adapts to changes in the environment.	5.6
The program makes decisions about which components are ineffective and should not continue.	5.0

## Strategic Planning

The program plans for future resource needs.	5.3
The program has a long-term financial plan.	3.9
The program has a sustainability plan.	3.6
The program's goals are understood by all interested parties.	5.9
The program clearly outlines roles and responsibilities for all partners.	5.7

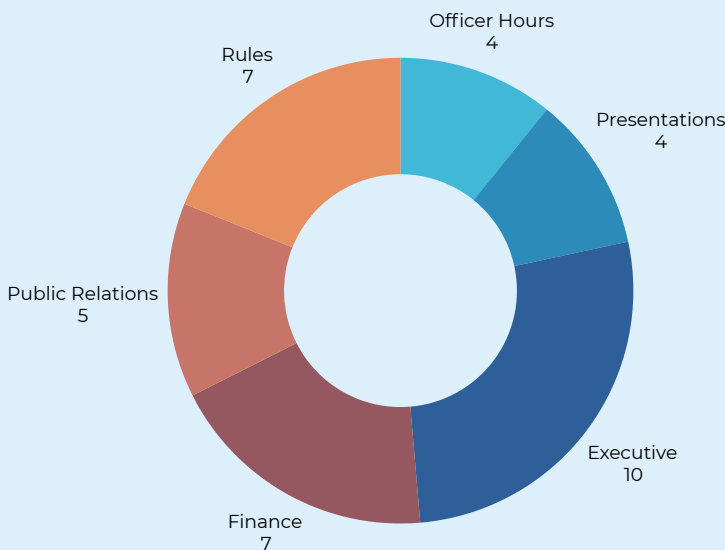
# EXECUTIVE DIRECTOR REVIEW



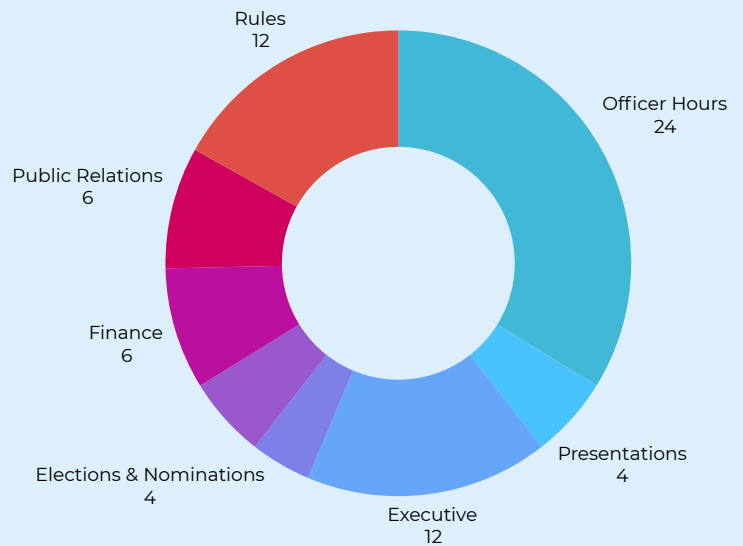
Amanda Perry, M.Ed., NRP

**Commitments of the Executive Director:** The OTCC Executive Director is charged with all administration aspects of the Commission. She facilitates each Commission and Committee meeting, including preparing agendas, materials, and minutes. She is responsible for timely public notice and access to each meeting. The Executive Director fields all OTC and OTCC related emails, phone calls, and other communications, ensuring accurate representation of the organization and its initiatives. She blocks “office hours” on her calendar to be available to state administrators and OTCC Commissioners. The Executive Director attends activities and conferences for outreach and marketing purposes. She co-coordinates the development of *CompactConnect* in collaboration with the Audiology & Speech-Language Pathology Compact, the Counseling Compact, and the Council of State Governments.

FY 2024  
Accomplishments



FY 2025  
Goals



## Association & Society Management International, Inc. (ASMI)

ASMI provides full service secretariat services to the Occupational Therapy Compact Commission. The OTCC Executive Director is employed by ASMI and is responsible for, in collaboration with other subject matter experts within ASMI, the OTCC’s overall operations and progress.



# ANNUAL IMPACT REPORT

## Occupational Therapy Compact Commission

OCTOBER 2024



ASMI is committed to working in a space that positively impacts people. Our staff supports, guides, and promotes the professions and industries that impact people around the world every day. ASMI delivers expertise and performance to help transform socially principled non-profit organizations from good to great.

### SCOPE OF WORK

### DETAILS

### DELIVERABLES

**General & Administrative**

**Facilities, staffing, operations,**

- HQ office
- Team of specialists
- Human Resource management
- Record maintenance
- Commission support
- Manage accounts payable/receivable

**Financial & Corporate Business**

**Monitor financial performance**

- Reconcile monthly statements
- Develop budget with Treasurer
- Secure filing services / prepare audit reports
- Provide sound fiscal management program
- Seek funding opportunities (grants)

**Governance**

**Planning, Commission Meetings, Governance, Standing Committees**

- Strategic planning and implementation
- Prepare meeting agendas, minutes, reports, post notices, post approved minutes
- Prepare draft rules and ensure rulemaking procedures are followed, including public comment processes
- Monitor regulatory compliance

**Data System**

**Planning, project management**

- Vendor selection & contract negotiations
- Project management and collaboration
- Determine user stories & test users
- Perform test functionality & provide feedback

**Communications**

**Development & Outreach**

- Develop reporting & communication templates
- Manage website
- Promote & expand the OTC's presence
- Maintain & monitor email service
- Develop proposals
- Give presentations, attend conferences, provide education
- Manage external stakeholder relationships

**On behalf of the OTCC, ASMI provides all necessary management infrastructure including appropriate staffing, technology, and resources.**

## Staff Acknowledgements

### GENERAL & ADMINISTRATIVE

Elizabeth Armstrong  
Adrienne Wilson  
Amanda Perry

### FINANCIAL & CORPORATE BUSINESS

Elizabeth Armstrong  
Barbara Tyeryar  
Kelly Eigler  
Amanda Perry

### OPERATIONS

Dia Gainor  
Amanda Perry

### DATA SYSTEM

Amanda Perry  
in collaboration  
with CSG

### COMMUNICATIONS

Dawn Shiley  
Amanda Perry

# OTC statuses of states and territories

	STATE	EFFECTIVE DATE	COMMISSIONER
	<b>Alabama</b>	June 1, 2022	Amanda Smith
	<b>Alaska</b>	Not in the OTC	----
	<b>Arizona</b>	April 6, 2022	Chris Daly
	<b>Arkansas</b>	August 1, 2023	Juli Carlson
	<b>California</b>	Not in the OTC	-----
	<b>Colorado</b>	July 6, 2021	Zen Mayhugh
	<b>Connecticut</b>	Not in the OTC	-----
	<b>Delaware</b>	August 4, 2022	Karen Rohrer
	<b>Florida</b>	Not in the OTC	-----
	<b>Georgia</b>	July 1, 2021	Adrienne Price
	<b>Hawaii</b>	Not in the OTC	-----
	<b>Idaho</b>	Not in the OTC	-----
	<b>Illinois</b>	Not in the OTC	-----

# OTC Statuses of states and territories

	STATE	EFFECTIVE DATE	COMMISSIONER
	<b>Indiana</b>	July 1, 2023	Sharon Pape
	<b>Iowa</b>	July 1, 2022	Venus Vendoures-Walsh
	<b>Kansas</b>	Not in the OTC	-----
	<b>Kentucky</b>	April 8, 2022	Renee Causey-Upton
	<b>Louisiana</b>	January 1, 2024	Vincent Culotta
	<b>Maine</b>	June 22, 2021	Jessica Bolduc
	<b>Maryland</b>	October 1, 2021	Michelle Bianchi
	<b>Massachusetts</b>	Not in the OTC	-----
	<b>Michigan</b>	Not in the OTC	-----
	<b>Minnesota</b>	August 1, 2024	Daniella Filardo
	<b>Mississippi</b>	July 1, 2023	Felicia Wang
	<b>Missouri</b>	August 28, 2021	Vanessa Beauchamp
	<b>Montana</b>	October 1, 2023	Trent Gahl

# OTC statuses of states and territories

	STATE	EFFECTIVE DATE	COMMISSIONER
	<b>Nebraska</b>	July 18, 2022	Claire Covert-Bybee
	<b>Nevada</b>	Not in the OTC	-----
	<b>New Hampshire</b>	July 1, 2021	Bethany Cottrell
	<b>New Jersey</b>	Not in the OTC	-----
	<b>New Mexico</b>	Not in the OTC	-----
	<b>New York</b>	Not in the OTC	-----
	<b>North Carolina</b>	June 11, 2021	Danielle Ward
	<b>North Dakota</b>	Not in the OTC	-----
	<b>Ohio</b>	June 30, 2021	Missy Anthony
	<b>Oklahoma</b>	Not in the OTC	-----
	<b>Oregon</b>	Not in the OTC	-----
	<b>Pennsylvania</b>	Not in the OTC	-----
	<b>Rhode Island</b>	August 1, 2024	Lise Faulise

# OTC statuses of states and territories

	STATE	EFFECTIVE DATE	COMMISSIONER
	<b>South Carolina</b>	May 13, 2022	Lesly James
	<b>South Dakota</b>	July 1, 2023	Megan Johnke
	<b>Tennessee</b>	April 19, 2022	Noranda French
	<b>Texas</b>	Not in the OTC	-----
	<b>Utah</b>	May 4, 2022	To Be Determined
	<b>Vermont</b>	July 1, 2025	To Be Determined
	<b>Virginia</b>	January 1, 2022	Kathryn Skibek
	<b>Washington</b>	June 9, 2022	Kathy Weed
	<b>West Virginia</b>	May 26, 2022	Vonda Malnikoff
	<b>Wisconsin</b>	February 5, 2022	Teri Black
	<b>Wyoming</b>	July 1, 2022	Nicole Harris
	<b>Washington D.C.</b>	Not in the OTC	-----
	<b>Guam</b>	Not in the OTC	-----
	<b>Mariana Islands</b>	Not in the OTC	-----
	<b>Puerto Rico</b>	Not in the OTC	-----

# ACCOMPLISHING THE GOALS

While tangible deliverables are met and accounted for, as evidenced in this report, there are notable details and behind-the-scenes activities that are integral to the successful operationalization of the OTC.

The Council of State Governments (CSG) and the American Occupational Therapy Association (AOTA) have a paid agreement focusing on advocacy, enacting legislation in non-compact member states. The National Board for Certification in Occupational Therapy (NBCOT) dedicates staff time to this initiative. Without the collaboration of these entities, the OTC would not exist, serving the current 31 OTC member states with more to come!

The initial development of *Compact Connect*, the national data system, is funded, in part, through a separate and generous funding contribution from NBCOT along with funding from the two other compacts participating in this joint database initiative. Beyond the initial development, the OTCC, through its ongoing support from both AOTA and NBCOT, is prepared to fund subsequent development phases to its completion.

Both AOTA and NBCOT are committed to funding the OTCC's operations through their respective 2025 fiscal years. With the development of *Compact Connect*, the OTCC will facilitate issuing interstate privileges-to-practice (equivalent to state licensure) thereby generating revenue, bringing it closer to independent financial sustainability. In the second quarter of FY25, the OTCC will vote on the recommended OTC administrative fee to obtain a privilege-to-practice. For further financial sustainability, the OTC legislation provides a pathway to collect a member assessment fee from participating Compact states.

States have the option to charge a fee to practitioners seeking an OTC privilege-to-practice in their states. The states are responsible for determining their fee amounts, and the OTCC has no influence on those amounts. States are encouraged to set fees similar to their license fees.

The OTC administrative fee is separate from potential state fees. However, *Compact Connect* is developed in such a way that all associated fees (OTC and state) will be paid in one transaction through the secure payment process.

Many moving parts, thoughtful discussions, and informed decisions go into accomplishing the goals of the OTC. Time and financial resources are the essence that drive it forward.

It is with heartfelt gratitude that the OTC's leadership acknowledges the ongoing support and contributions from AOTA and NBCOT!





THANK  
YOU

Learn More

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[www.linkedin.com/in/occupational-therapy-compact](https://www.linkedin.com/in/occupational-therapy-compact)

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