



# PA Compact Rules Committee Meeting Minutes

August 25, 2025

Name	Member Role	Voting Member	Attendance
Jamie Alley	WV Delegate	x	x
Susan Giles	KS Delegate	x	x
Valeska Barr	OK Delegate	x	x
Elizabeth Huntley	MN Delegate	x	x
Stephanie Loucka	OH Delegate	x	x
Catherine Marie Patterson	TN Delegate	x	
Larry Marx	UT Delegate	x	x
Robert Sanders	WI Delegate	x	
Lucy Treene	VA Alternate	x	
<b>Total voting members present</b>			6/9
Marisa Courtney	Vice Chair PA Commission		x
Kathy Scarbalis	Ex-Officio – AAPA		x
Nathan Smith	OH board staff		
Tim Terranova	Chair PA Commission		x
Name	Non-Member Role		Attendance
Nahale Kalfas	Interim Legal Counsel		x
Abigail Mortell	Interim Executive Director		x
Carl Sims	CSG		x
Laura Monick	OH staff		x

VOTES		
Name	Agenda	Minutes (July 10)
Jamie Alley		
Valeska Barr		2
Elizabeth Huntley		
Stephanie Loucka		
Catherine Marie Patterson		
Larry Marx	2	1
Robert Sanders		
Susan Gile	1	
<b>TOTALS</b>	Motion passes	Motion passes

**Welcome**

**Call to order/Roll Call**

Chair Loucka calls to order the meeting at 1:03 p.m. ET.

8 Met Quorum at 1:03 p.m. ET.

9 A. Mortell takes roll. 6/8 voting members present.

### 11 **Review and Adopt Agenda**

12 Committee reviewed the agenda; Chair Loucka called for a motion to adopt the agenda.

#### 13 **Motion:**

- 14 • Susan Gile motions to adopt the agenda.
- 15 • Larry Marx seconds.
- 16 • Agenda is adopted.

### 18 **Minutes from July 10, 2025**

#### 19 **Motion:**

- 20 • Larry Marx motions to adopt the minutes.
- 21 • Valeska Barr seconds.
- 22 • The minutes are approved.

### 25 **Draft Rule 3 – Compact Privilege Process**

- 26 • Chair Loucka opens discussion on draft rule 3.
- 27 • N. Kalfas explains the rule approval process and that a friendly amendment could be
- 28 made to the agenda to make approving the draft of rule 3 a voting item.
- 29 • Section 3.5.c.1
  - 30 ○ V. Barr: At renewal, will states need to conduct another background check?
  - 31 ○ L. Monick: The majority of states currently make an attestation at renewal, so it
  - 32 would be up to the state and how they conduct their renewal process.
  - 33 ○ Chair Loucka: Attestation or Rap Back service are options.
  - 34 ○ N. Kalfas: Several member states participate in the Rap Back program.
- 35 • Section 3.6.d
  - 36 ○ J. Alley: It permits a PA who voluntarily terminates a qualifying license to
  - 37 continue practicing under existing compact privileges while they're applying for a
  - 38 new qualifying license. Is that the way we want the process to go, so someone
  - 39 would not have a state of qualifying license and practice pursuant to a privilege,
  - 40 or should the new state of qualifying license be established prior to the old one
  - 41 being terminated? If it is left as written, should there be a time limit for
  - 42 establishing the new state of qualifying license?
  - 43 ○ Chair Loucka agrees that as currently written it leaves it indefinite as to when a
  - 44 practitioner must establish their qualifying license in the new state. Can you not
  - 45 have a qualifying license under an existing state and still practice under the
  - 46 compact?
  - 47 ○ N. Kalfas: You must have a qualifying license to participate in the compact. Some
  - 48 other commissions have said the original qualifying state continues until the new
  - 49 state license has been established, which avoids a practitioner practicing under the
  - 50 compact without a qualifying license. The previous qualifying state would have to
  - 51 stay in place until the new state is processed.
  - 52 ○ C. Sims confirms that is his recollection of how other commissions have handled
  - 53 change of qualifying state.

- J. Alley: The qualifying state can only remain the qualifying state if the single state license is maintained. What if there is a situation where someone allows their license in the qualifying state to expire?
- N. Kalfas: Privileges extinguish when qualifying licenses expire. If you choose not to renew your license, the compact privileges will expire as a result.
- J. Alley: Last time we discussed making sure someone could apply to change their state of qualifying license before that license expires.
- K. Scarbalis: This language may have come about given the last-minute nature of moving for military families. Agrees with including a time limit consistent with our other operations such as 30 days or 60 days.
- L. Monick: In a previous meeting there were concerns about continuation of practice, and that is why there was this language update. Agrees with N. Kalfas that once the qualifying license expires all privileges do as well.
- Chair Loucka: This rule will not be voted on yet since this section needs to be fixed. Possible language would be “so long as the license in the original state is not expired, a PA that voluntarily terminates their qualifying license...” With a sentence at the end that reiterates that once a license expires, the privileges expire with it. The practitioner is not terminating their qualifying license, rather the designation of their license as their state of qualifying license. They may still hold that license after they change the qualifying license designation.
- S. Gile: Are they just redesignating the state of qualifying license?
- Chair Loucka confirms.
- J. Alley: Is there a way for us to have a process to do the redesignation of state of qualifying license before the current designated license expires? This would allow for continuity on the front end since privileges terminate.
- Chair Loucka: That makes sense, we will take direction in rewriting that portion accordingly.
- Timing of terminating previous qualifying state after new state of qualifying license is designated and approved
  - N. Kalfas: If practitioners can hold their previous qualifying license while applying for a new one, once the new qualifying state is approved, they must terminate their previous state of qualifying license within a certain period.
    - Suggested language: “A PA must consistently maintain a qualifying license in order to maintain compact privileges. A PA may apply for a new qualifying license while still holding the previous qualifying license.”
- N. Kalfas: In some of the other compacts there is a section that allows conversion of what was previously a privilege into a single state license. This brings up the possibility of converting what was previously a state of qualifying license into a privilege. Will review the compact to understand how that would work. The main thing is giving the PA the knowledge that they must keep a qualifying license to utilize compact privileges, and once a new state of qualifying license is established the previous one will be extinguished. They may then choose to pursue a privilege for the state that was previously their state of qualifying license.
  - L. Monick: We had previously considered a redesignation process; however, the statute only discusses changing the qualifying license when the licensee

- 99 terminates the one they are holding. Will review the statutes and our history of  
100 our changes so far to know where we landed on the redesignation terminology.
- 101 • Section 3.4
    - 102 ○ T. Terranova: There are still comments with questions in this section, were those  
103 addressed last meeting?
      - 104 ■ Sec. 3.4 a.5, “To apply for a Qualifying License a PA shall: Sign an  
105 attestation that the applicant is unaware of any pending investigation of  
106 the current qualifying license at the time of the application.”
      - 107 ■ L. Monick comment in doc.: “If the application noted in a.1 includes a  
108 question about pending investigations you would not need this addition.”
    - 109 ○ N. Kalfas: Even if the application has it, it is still best to include it in the rule to  
110 give adequate notice.
    - 111 ○ Chair Loucka: We can review those comments when we are rewriting and  
112 consider them as a committee next meeting.

#### 113 114 **Draft Rule 5 – Compact Data System**

- 115 • Chair Loucka moves discussion to draft rule 5. Recommends waiting to discuss  
116 definitions in section 5.1 since the definitions may need to change based on the decisions  
117 made on the other sections of the rule, unless it comes up in our discussion.
- 118 • A. Mortell emails the prewritten comments to committee members.
- 119 • Chair Loucka asks what the committee thinks about the overall structure of the rule.
  - 120 ○ N. Kalfas appreciates how J. Alley delineated the difference between different  
121 kinds of reports, such as a final action report, significant investigative information  
122 report, etc. The only comments I have in speaking with C. Sims are those things,  
123 based on previous experience in building a data system, that may be hard to  
124 achieve, along with thoughts on what you want the public to see (non-  
125 practitioners). The rule is organized well, and I can follow it.
  - 126 ○ N. Kalfas: If the questions we are getting from the states who are looking to pass  
127 the compact are any indication, the only area you will need to make a separate  
128 rule on is investigations because they implicate subpoenas. You can still mention  
129 investigations as it relates to this and reference the rule that explains it in greater  
130 detail.
  - 131 ○ L. Marx agrees with N. Kalfas that a separate rule on investigations is necessary,  
132 particularly since it is not spoken about at length in the compact legislation.  
133 Through rulemaking we will need to establish how states work cooperatively in  
134 response to bad actors.
  - 135 ○ Chair Loucka: The difficulty is that there is not much on this in the compact law,  
136 so we will need to default to state law and account for their differences.
  - 137 ○ K. Scarbalis: A lot of PAs are asking at their state conferences about the  
138 discipline process, and once this rule is written the Communications Committee  
139 can develop an FAQ addressing it.
  - 140 ○ Chair Loucka: Yes, the communication piece is critical to this, so people know  
141 the process when they are in the compact compared to having a traditional singe
- 142 • Section 5.2 – Data System
  - 143 ○ No comments on 5.2a
  - 144 ○ 5.2b

- L. Monick: What is the difference between 5.2b, 1, and 5? And should 5.2b 5 be discipline rather than denials?
- J. Alley: In the compact, section 8.b 4 requires each state to submit a uniform dataset to the system. One of the parts that is required is any denial of application for licensure and the reason. The reason 1 and 5 are set out separately is because I was trying to figure out the things that would be submitted by the state and those things that would be maintained by the commission within the data system. The system needs to know and associate with a PA denials and any term of eligibility on the compact level. That seems like data that is generated and maintained by the commission rather than entered by the qualifying state. That could be part of the uniform data set and not delineated.
- N. Kalfas: This is one of the pieces that is hard to imagine because you don't know how reliant you will be on a third party for information. With other commissions the states are heavily informing the function of the data system, and there is no information being provided by a third party. I do not see how the commission will generate some of this information.
- J. Alley: Yes, but the system must be built in a way that someone can search whether a practitioner has been denied. The value of breaking this out is that this system must have the capability to have this information even if it is provided by a participating state.
- 5.2.b.2
  - L. Monick suggests changing “related data” to “related *licensing* data.”
  - No objections to this change.
- 5.2.c
  - L. Monick: Will the system be maintaining information only on those people participating in the compact or all eligible PAs regardless of whether they have applied for a compact privilege?
  - J. Alley: I had this same concern, which is why the language is conditional.
  - N. Kalfas: There is a broad diversity among states in other compacts regarding whose information they upload into the data system.
  - Chair Loucka shares the same concerns as J. Alley and L. Monick with sharing all people from a state and thinks the commission needs to be conservative regarding sharing practitioner information.
  - K. Scarbalis: It may be beneficial to leave the rule broad to allow for states to decide whether they share all their eligible practitioners or just those who have opted in to utilizing the compact.
  - J. Alley: This language is intended only to apply for information coming from a third party if the commission elects to integrate that into the data system.
  - S. Gile: Could it be as simple as adding to paragraph (c) at the end, “Non-designated PA information will be maintained separately from compact-designated PAs.”
  - J. Alley: I don't know how to get the NCCPA data without accepting that data for all practitioners regardless of their compact participation.
  - A. Mortell adds comment on 5.2c to find out how the NCCPA data would reach the compact data system.

- N. Kalfas: Somewhere you could include “As the data system can accommodate.” This catch-all helps prevent setting the system up a certain way only to find the data system cannot accommodate it. States have decided to upload everybody into the system to prevent a delay for those who opt into the compact later. As a commission, we are only narrowly authorized to do what the member states have told us to do. In the rule, it must be clear that use of the information from the third party is authorized by the participating state from which that participants information came.
    - K. Scarbalis: It could also be helpful to have a running list of questions for the vendors who present in response to the RFP.
  - 5.2.c
    - Chair Loucka shares committee question, “Is line 88 meant to account for using NCCPA data?”
    - Chair Loucka: We do not know the answer to that question yet, and that will be a tech committee question.
  - 5.2.d
    - Chair Loucka shares written committee question, “Should the language in line 94 read ‘*Only* the appropriate licensing board(s)’?”
    - J. Alley agrees with this change and adds that commission staff will also need access.
    - Chair Loucka shares written committee question on line 95, “Should this read ‘as authorized per this rule’ rather than ‘as appropriate’?”
    - Chair Loucka agrees with “as authorized” but would remove “per this rule” as some of the structure may result from the data system limitations.

Break – 2:29 p.m. ET.

Reconvene – 2:32 p.m. ET.

## **Draft Rule 5 – Compact Data System, continued**

- Section 5.3 – Uniform Data Set
  - 5.3.c
    - L. Monick: Is there too much information?
    - T. Terranova: Draft rule 3 says it’s the PA’s responsibility to provide the commission with their address. I think the state should be responsible for verifying that information.
    - Chair Loucka: Regarding the address, if people are moving around a lot since the compact does not require a home state, the state of qualifying license may not have the most up-to-date address for practitioners.
    - J. Alley: My experience from the IMLC, we routinely get applications in which the address the physician provides is not what is on file, so we regularly verify addresses. If a PA comes to the system to update their address, that would be populated to all the member states. If the state of qualifying license had concerns, they could follow up with the PA.
    - Chair Loucka: I think it does account for the discrepancy when practitioners do not keep their information up to date with their state licensing board.

- 237                   ▪ N. Kalfas: In another commission’s data system, the practitioner is told  
238                   that by giving their address they are submitting to service of process at this  
239                   address. You can make it incumbent upon the practitioner to provide the  
240                   information but also allow the state to put in what they have, and the  
241                   system could notify states what the most current information is according  
242                   to state records. Since this is an additional pathway, you do not have to  
243                   think of the process in exactly the same way as single state licensure.
- 244     • 5.3.c.5 and 6
  - 245         ○ Chair Loucka: Should we include the NPI and SSN?
    - 246             ▪ N. Kalfas: Do all PAs have an NPI?
    - 247             ▪ K. Scarbalis: Yes.
    - 248             ▪ N. Kalfas: Do all boards collect the NPIs?
    - 249             ▪ J. Alley and E. Huntley: No.
    - 250             ▪ T. Terranova: It is optional in Maine.
    - 251             ▪ N. Kalfas: That would suggest the SSN needs to stay.
    - 252             ▪ T. Terranova suggests including “NPI as available.”
    - 253             ▪ N. Kalfas: That is how other commissions have addressed this.
    - 254             ▪ Chair Loucka: Since (c) says we will verify the NPI, and there are many  
255             state boards who do not collect NPIs, that may necessitate building out a  
256             system collects it. Could we remove NPI and leave only SSN?
      - 257                 • No objections from committee.
    - 258             ▪ N. Kalfas: Certain states do not collect SSNs.
    - 259             ▪ Chair Loucka: During stakeholder review, we will likely receive feedback  
260             on that that can be helpful.
  - 261         • 5.3.c.8 (formerly 9)
    - 262             ○ Chair Loucka shares written committee question, “Should ‘Email address  
263             delegated by applicant’ be changed to ‘*designated* by applicant?’”
      - 264                 ▪ Chair Loucka agrees with this as an administrative change.
    - 265             ○ N. Kalfas asks for note to be added in this section about “accepting service of  
266             process.”
  - 267         • 5.3.c.9 (formerly 10)
    - 268             ○ K. Scarbalis: Between 1983–76, there were people who did not graduate from a  
269             credentialed program who took PA boards, so their qualifications are based on  
270             completion rather than graduation. An exception clause is needed for people who  
271             may not have graduated from an accredited PA program but are currently  
272             certified.
    - 273             ○ Chair Loucka: What does the law say?
    - 274             ○ L. Monick: “...or other programs authorized by commission rule.”
    - 275             ○ K. Scarbalis: So those people fall under “other programs” currently.
    - 276             ○ J. Alley: If the commission promulgates a rule to accept something other than a  
277             graduation from an accredited program, that is going to be a rule that would have  
278             to be developed.
    - 279             ○ Chair Loucka favors leaving the law as is, limiting it to people who have  
280             graduated from a PA program. But that is a discussion for a separate rule.

- T. Terranova: How many people would this effect? The last completion date was about 40 years ago, so hopefully most of those PAs are reaching retirement. Would it be worth it?
  - K. Scarbalis knows PAs who are still recertifying that are in that age group.
  - T. Terranova: NCCPA likely has workforce data.
  - K. Scarbalis agrees to reach out to NCCPA on that point.
  - Chair Loucka notes that as a future rule topic.
- 5.3.c.10 (formerly 11)
  - Chair Loucka shares written committee question, “Does NCCPA refer to it as a certification number, or is it an NCCPA identification number?”
  - V. Barr: From a licensing standpoint as someone who processes applications, boards call it a certification number.
- 5.3.c.14 (formerly 15)
  - Chair Loucka shares written committee question, “Would denial of licensure include only denials related to participating in the compact or all denials?”
  - J. Alley: This language is from the compact, which does not provide more detail than that. It can be as broad or as narrow as we wish it to be.
  - N. Kalfas: I think you do have wiggle room.
  - J. Alley: It is easier for member states if it relates to people participating in the compact.
  - Chair Loucka: A state could do a non-permanent denial, which may not be part of their jacket, particularly if it is non-reportable. Would the “Any” be problematic?
  - V. Barr: “Any denial” is the language from the compact legislation.
  - Chair Loucka suggests this be something the states decide what they report based on their capabilities.
  - S. Gile agrees. Allowing someone to withdraw is not a denial. Unless the board says an application is denied, we would not report it.
  - Chair Loucka: I think about it in the context of NPDB and what we would report to them.
- 5.3.d
  - C. Sims: When it comes to assigning a privilege number, that is something that can be generated by the data system. It currently reads like the participating state is reporting the privilege numbers to the data system when in practice the system can assign the number when acting on behalf of and under the authority of the commission. Suggests removing “submit” and leaving only “verify.”
  - Chair Loucka: A remote state would submit adverse actions or significant investigative information, so they verify information under (1) and submit information under (2) and (3).
  - N. Kalfas suggests adding “submit, where applicable, ...”
  - J. Alley agrees with maintaining language with N. Kalfas’s suggested addition.
- 5.3.e.1
  - Chair Loucka shares L. Monik written question, “How is it handled if the practitioner changes their address with the commission but not the state of qualifying license, or vice versa?”



- J. Alley: In the first place, the address must be verified by the state of qualifying license and after that point there may be inquiries from the participating state if there are changes from then on.
  - Chair Loucka: That puts the onus on the individual to keep the data system up to date with personal information.
  - J. Alley: And we need the address history available.
  - Chair Loucka agrees.
- 5.3.e.3 & 4
  - L. Monick: This area is to be continued based on the data system.
  - Chair Loucka shares written committee question, “What is the start date for providing email and address changes?” And asks K. Scarbalis for clarification.
  - K. Scarbalis: Should there be a timeline associated with email and address changes.
  - J. Alley: That is a great point, but I think that goes in a different rule. This is about what the system has rather than a PA’s obligation to keep an address up to date with the system.
  - T. Terranova notes that is addressed in rule 3, which says notification must occur within 30 days.
- 5.4 – Reports of Adverse Actions and Significant Investigative Information
  - Chair Loucka asks committee members to review definitions for “adverse action” and “significant investigative information.”
  - Chair Loucka: Regarding significant investigative information, have we fleshed out what qualifies as “more than a minor infraction”?
    - J. Alley agrees it needs to be defined, and the committee needs to decide where and how.
    - Chair Loucka suggests defining it in this rule.
    - N. Kalfas suggests utilizing the definition from the ASLP commission’s rule.
    - C. Sims provides the following language from ASLP commission rule:
      - “‘Minor Infraction’ means an infraction not related to the practice of audiology or speech-language pathology 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 and is not reportable to the National Practitioners Data Bank.”
    - S. Giles notes there is no interstate agreement on what is considered “more than a minor infraction.”
    - J. Alley: In terms of the transmission of significant investigative information, would the significant investigatory information notification occur when the board knows there is evidence to proceed upon? Sometimes boards do not know at that point whether it will encumber a license or not.
    - V. Barr: How our legal counsel interprets when to report is when a citation is issued.
    - J. Alley: There may be some value in ambiguity in this section since it varies between states.

- Chair Loucka and S. Giles agree.
  - N. Kalfas: How many other compacts look at this is: the initial complaint has come in, the board shares the concern with the practitioner, at which point the practitioner has an opportunity to respond. It will be up to each states' interpretation, but the commission can provide guardrails to prevent states from providing unnecessary information.
  - Chair Loucka leans towards leaving the definition as is.
  - S. Gile: In the provided definition, I do like that it is not related to the practice. That might answer some of the questions.
  - J. Alley: I did play around with the definition, including language such as "does not adversely impact public safety and based upon the participating state's experience, is not likely to result in discipline to be reported to the databank."
  - S. Gile agrees and suggests adding at the top "minor infraction generally means." We cannot write rules that account for every eventuality. If someone has an example in which the definition does not hold, that is fine, as we just want to provide people with guardrails.
  - V. Barr: The people in Oklahoma who are processing other compact privileges and/or licenses have no idea what investigations is doing, so we do not know about it until it comes to a level that there is a citation and information is made public. We should not make it a requirement to report information that is not yet available.
- Chair Loucka shares S. Gile comment, "This section should specify that it relates to public adverse actions since those are likely the only adverse actions Kansas will share."
  - N. Kalfas: I wish we had not in these compacts spoken about adverse actions and instead referred to encumbrances, which refers to an action that prevents you from practicing.
  - L. Marx agrees with N. Kalfas because an encumbrance is something boards can share based on their laws and regulations, whereas there are some adverse actions that are not reportable. Encumbrances are always reportable, and it seems it would have been easier to understand what qualifies as reportable.
  - T. Terranova: What if it was added under adverse actions anything that meets the requirements of reporting for NPBD?
  - J. Alley: Adverse action is defined in the compact, and I do not think we can change its definition in any way that substantively alters what it means.
  - S. Gile: We do have non-public discipline when we have people who agree to do a PDP. That is not reportable nor public. If they do not do it, it is reported to the board and could lead to an incumbrance.
  - L. Monick: Looking at the statute, it talks about adverse actions that result in limiting, restricting, or revoking the qualifying license affect a practitioner's participation in the compact, which might help guide what a minor infraction is.

• 5.4.b.1

- 417           ○ Chair Loucka shares L. Monick’s written question, “Should it be ‘public action’  
418           rather than “public complaint’?”  
419           ○ J. Alley confirms.
- 420      • 5.4.c.
- 421           ○ Chair Loucka shares L. Monick suggestion to remove the SQL under all participating  
422           states shall report the existence of serious investigative information concerning a PA  
423           who holds a compact license or qualifying license in that state.  
424           ○ L. Monick: When reporting SII, I think everyone has to report that information.  
425           ○ J. Alley: If you have a PA in your state that is not participating in the compact about  
426           whom a state has significant investigatory information, do you report that  
427           information? I do not think you do.  
428           ○ L. Monick agrees.  
429           ○ J. Alley clarifies the rule should not be read such that a remote state must report  
430           information on their practitioners who are not participating in the compact.  
431           ○ N. Kalfas suggests “participating states shall report the existence of significant  
432           investigative information concerning PAs who are utilizing the compact.”  
433           ○ J. Alley: Do states need to report investigative information on practitioners who are  
434           members of the compact when the investigation relates to action done utilizing a  
435           single state license that is not their state of qualifying license?  
436           ○ N. Kalfas believes they do not, J. Alley agrees and references that language as it  
437           currently appears is necessary to explain that distinction.
- 438      • 5.4.d.1
- 439           ○ Chair Loucka shares L. Monick comment that a definition of public complaint is  
440           needed.  
441           ○ Chair Loucka suggest leaving it ambiguous on what the commission considers a  
442           public complaint.  
443           ○ T. Terranova: Any mention of NPI number will need to be removed from this section  
444           and throughout the rule where mentioned.  
445           ○ Chair Loucka shares S. Gile’s comment on whether states are likely to adhere to the  
446           requirement to provide contact information for follow-up and subsequently provide  
447           that follow-up when asked.  
448           ○ L. Marx: Do we want to discuss public complaint but rather public action? To me it is  
449           not useful to have public complaints since we do not usually share them. Once we  
450           verify it and act, we share that information.  
451           ○ N. Kalfas: Nursing is creating an access list of who oversees investigations, reporting  
452           licensure data, etc. For each licensing board. In terms of getting contact information,  
453           that would be fantastic to know who on each board is responsible for what.  
454           ○ L. Monick: In Ohio, disclosing confidential investigative information is going to be a  
455           first-degree misdemeanor. Some states will have an issue with the confidentiality of  
456           significant investigative information.  
457           ○ V. Barr: Is this regarding the information put in the database?  
458           ○ Chair Loucka confirms.  
459           ○ V. Barr: In Oklahoma, we would be putting what is in our public complaints into the  
460           system. The term public complaint means it has already been made publicly available.  
461           ○ Chair Loucka: After this discussion, we will have to revisit these points based on  
462           what was shared today and how it would apply in each state’s situation.

• 5.4.d.3

- Chair Louck shares L. Monick’s written comments, “The committee may want to consider fewer deadlines; reporting SII after a public complaint is issued; and term “non-public determination” is not found in Ohio statute.”
- J. Alley: There is not a lot of information in the compact regarding SII.
- Is there value in thinking of this as a check the box, does significant investigative information exist, yes or no, and a contact for that state for other participating states to reach out to for further information.
- Chair Loucka: Would the member states have to affirmatively look for the check boxes or would they receive a report?
- J. Alley: In a perfect world that information would be reported out.
- N. Kalfas: In other systems, there is a flag indicating significant investigatory information exists. Then, a notification goes out through the data system, so the states where that practitioner is practicing are aware that that information exists and may contact the state that flagged it.
- T. Terranova, S. Gile, and K. Scarbalis favor that concept.
- Chair Loucka: Have we spoken about the possibility of a compliance committee?
- T. Terranova: It was spoken about at the full commission meeting but put off as something to address down the road since the commission is not at the point of utilizing such a committee.
- Chair Loucka shares K. Scarbalis written comment that this information should be summarized and included as an FAQ on the compact website.

**Next Steps**

- Next meeting, draft rule 1 (formerly rules 2 & 3) will be completed and sent to the Executive Committee. The committee will also continue working on draft rule 5.

**Delegate Comment**

- T. Terranova and Chair Loucka express their appreciation for the committee’s work.

**Public Comment**

None.

**Adjourn**

Chair Loucka adjourns the meeting at 3:55 p.m. ET.