Compacts: Occupational Therapy Licensure, Respiratory Care, Esthetics Licensure, and Athletic Trainer Licensure; HB 2533

HB 2533 enacts four multistate licensure compacts:

- Occupational Therapy Licensure Compact (OT Compact);
- Respiratory Care Interstate Compact (RC Compact);
- Esthetics Licensure Compact (Esthetics Compact); and,
- Athletic Trainer Licensure Compact (AT Compact).

The uniform provisions for each compact are outlined below. As of June 8, 2026, the required numbers of states had enacted the OT, RC, and AT compacts to reach their activation thresholds.

Occupational Therapy Licensure Compact

Purpose

The purpose of the OT Compact is to facilitate the interstate practice of occupational therapy with the goal of improving public access to occupational therapy services and achieving a number of objectives that reduce administrative burden while increasing availability of licensed occupational therapists as well as cooperation among member state licensing bodies.

The OT Compact preserves the regulatory authority of participating states to protect public health and safety through the current system of state licensure while also providing license portability for qualifying professionals.

Definitions

The OT Compact defines 26 terms used throughout the OT Compact, including these:

- "Occupational therapist" means an individual who is licensed by a state to practice occupational therapy;

- "Occupational therapy assistant" means an individual who is licensed by a state to assist in the practice of occupational therapy;

- "Occupational therapy," "occupational therapy practice," and "the practice of occupational therapy" mean the care and services provided by an occupational therapist or an occupational therapy assistant as set forth in the member state's statutes and regulations;

- "Occupational Therapy Compact Commission" or "Commission" (OT Commission) means the national administrative body whose membership consists of all states that have enacted the OT Compact; and

- "Single-state license" means an occupational therapist or occupational therapy assistant license issued by a member state that authorizes practice only within the issuing state and does not include an OT Compact privilege in any other member state.

State Participation in the OT Compact

The OT Compact requires member states to:

- License occupational therapists and occupational therapy assistants;
- Participate fully in the OT Commission data system including using the OT Commission's unique identifiers;
- Have a mechanism in place for receiving and investigating complaints concerning licensees;
- Notify the OT Commission of any adverse actions or the availability of investigative information regarding a licensee;
- Implement or utilize procedures for considering the criminal history records of applicants for an initial OT Compact privilege. These procedures will include the submission of fingerprints or other biometric-based information by applicants for the purpose of obtaining a criminal history record from the Federal Bureau of Investigation and the comparable state agency for OT Compact licensees;
- Comply with the rules of the OT Commission;
- Utilize only a recognized national examination as a requirement for licensure; and
- Have continuing competence or education requirements as a condition for license renewal.

The OT Compact requires granting a compact privilege to each licensee who has met the terms of the OT Compact and rules, authorizes member states to charge a fee for granting an OT Compact privilege, and requires each member state to provide for the state's delegate to attend all OT Commission meetings.

OT Compact Privilege

The OT Compact requires licensees to meet certain fee, reporting, and credentialing criteria to exercise OT Compact privileges and aligns OT Compact privilege with the underlying valid home state license including renewal criteria and supervision requirements set by the licensee's home state. The OT Compact requires a licensee practicing in a remote state to adhere to the remote state's laws and regulations related to providing occupational therapy.

Obtaining a New Home State License by Virtue of OT Compact Privilege

The OT Compact allows a licensee to have only one home state license at a time. The OT Compact provides a procedure to change a licensee's home state license when relocating between member states.

Active-duty Military Personnel or Their Spouses

The OT Compact allows active-duty military personnel or their spouses to designate a home state where such service member or spouse has a current license in good standing and allows such military personnel or spouse to retain that home state designation while the service member is on active duty.

Adverse Actions

The OT Compact allows a member state to take adverse action against a licensee's OT Compact privilege in that member state and to issue subpoenas. Only the licensee's home state will have the authority to take adverse action against the license issued by the home state. However, a member state will have the authority to take adverse action based on the factual findings of another remote state if the other member state follows its own procedures for adverse actions. Member states will be permitted to recover costs of investigations or dispositions if permitted by their state law. The home state will be required to promptly report the conclusions of any investigation to the data system. The OT Compact will authorize joint investigations of licensees by member states.

Establishment of the Occupational Therapy Compact Commission

The OT Compact creates the OT Commission and includes provisions relating to membership, voting, powers and duties, and financing of the OT Commission. The OT Compact establishes the Executive Committee, which will have the power to act on behalf of the OT Commission according to the terms of the OT Compact.

The OT Compact will require the OT Commission to pay or provide for the reasonable expenses of its establishment, organization, and ongoing activities. The OT Commission will be authorized to levy and collect an annual assessment from each member state and impose fees on other parties of member states to cover the cost of operations. The OT Compact requires the OT Commission to adopt an annual audit report, including a financial review, and include the audit report in the OT Commission annual report.

The OT Compact provides for the qualified immunity, defense, and indemnity of its members, officers, executive director, employees, and representatives acting within the scope of OT Commission employment, duties, or responsibilities. The protections will not apply for damage, loss, injury, or liability caused by the individual's intentional, willful, or wanton misconduct.

Data Systems

The OT Compact requires the OT Commission to develop, maintain, and utilize a coordinated data system. The OT Compact governs how the information will be provided to the data system by member states and the use of the data by member states, as well as its designation of information that could not be shared with the public without the express permission of the contributing state. The OT Compact also requires removal of expunged information from the data system.

Rulemaking

The OT Compact authorizes the OT Commission to exercise rulemaking powers. The bill requires notice of proposed rules to specified persons and locations to be provided at least 30 days prior to the meeting where the OT Commission will consider such rules. Additionally, the OT Commission will be required to provide notice of the public hearing, provide access to the meeting, and record all hearings. The OT Compact will state a majority of legislatures of the member states could reject a rule by enactment of a statute or resolution within four years of adoption of the rule. The OT Compact also provides for emergency rulemaking procedures.

Oversight, Dispute Resolution, and Enforcement

The OT Compact provides that the executive, legislative, and judicial branches in each member state will enforce and effectuate the OT Compact. The OT Compact establishes judicial venue and service of process for the OT Commission. The OT Compact also establishes a process to be followed by member states regarding default, requesting technical assistance, or termination from the OT Compact. The OT Compact requires the OT Commission, upon member request, to resolve disputes arising among member states and between member states and non-member states. In addition, the OT Commission will be authorized to enforce the provisions of the OT Compact, and, by majority vote, could initiate legal action in federal court against a member state.

Date of Implementation of the OT Compact and Associated Rules, Withdrawal, and Amendment

The OT Compact is effective on the date on which the OT Compact statute is enacted into law in the tenth member state. [*Note*: The OT Compact has been enacted in 34 states and OT Compact privileges are being issued in 8 states as of July 15, 2026.]

Any member state will be allowed to withdraw from the OT Compact by enacting a statute that would repeal the OT Compact, but this will not take effect until six months after the enactment of the repealing statute. Withdrawal from the OT Compact will not end the continuing requirement to comply with the investigative and adverse action reporting requirements prior to the effective date of withdrawal.

Member states may amend the OT Compact, but any amendment would not be effective until it is enacted by all member states. Additionally, the OT Compact will not invalidate or prevent any licensure agreement or cooperative arrangement between a member state and non-member state that did not conflict with the OT Compact.

Construction and Severability

The OT Compact states the OT Compact and the OT Commission's rulemaking authority shall be liberally construed and the provisions of the OT Compact will be severable.

Binding Effect of Compact and Other Laws

The OT Compact requires a licensee providing occupational therapy in a remote state under OT Compact privilege to comply with the remote state's laws and regulations. The OT Compact will not prevent the enforcement of any other law of a member state not inconsistent with the OT Compact. Laws in conflict with the OT Compact will be superseded to the extent of the conflict, and all lawful actions of the OT Commission will be binding upon member states. If any provision of the OT Compact exceeds constitutional limits imposed on the legislature of a member state, the provision will be ineffective to the extent of the conflict in that member state.

Respiratory Care Interstate Compact

Purpose

The purpose of the RC Compact is to facilitate the interstate practice of respiratory therapy with the goal of improving public access to respiratory therapy services and achieving a number of objectives that reduce administrative burden while increasing mobility and availability of licensed respiratory therapists as well as cooperation among member state licensing bodies.

The RC Compact preserves the regulatory authority of states to protect public health and safety through the current system of state licensure while also providing license portability for qualifying professionals.

Definitions

The RC Compact defines various terms used throughout the RC Compact, including:

- "Commission" or "Respiratory Care Interstate Compact Commission" (RC Commission) means the governmental instrumentality and body politic of member states whose membership consists of all member states that have enacted the Compact;

- "Respiratory therapist" or "respiratory care practitioner" means an individual who holds a credential issued by the National Board for Respiratory Care or its successor and a license in a state to practice respiratory therapy. For purposes of the RC Compact, any other title or status adopted by a state to replace the term "respiratory therapist" or "respiratory care practitioner" will be deemed synonymous with "respiratory therapist" and will confer the same rights and responsibilities to the licensee under the provisions of the RC Compact at the time of enactment;

- "Respiratory therapy," "respiratory therapy practice," "respiratory care," "the practice of respiratory care," and "the practice of respiratory therapy" mean the care and services provided by or under the direction and supervision of a respiratory therapist or respiratory care practitioner; and

- "Scope of practice" means the procedures, actions, and processes a respiratory therapist licensed in a state or practicing under an RC Compact privilege in a state is permitted to undertake in that state and the circumstances under which the respiratory therapist is permitted to undertake those procedures, actions, and processes. Such procedures, actions, processes, and the circumstances under which they may be undertaken will be established through means, including, but not limited to, statute, regulations, case law, and other processes available to the state respiratory therapy licensing authority or other governmental agency.

State Participation in the RC Compact

The RC Compact requires member states to:

- Enact an RC Compact that is not materially different from the model RC Compact;

- License respiratory therapists;

- Participate in the RC Commission's data system;

- Have a mechanism in place for receiving and investigating complaints against licensees and RC Compact privilege holders;

- Notify the RC Commission of adverse actions regarding a licensee, an RC compact privilege holder, or a license applicant;

- Notify the RC Commission, in compliance with the terms of the RC Compact and RC Commission rules, of the existence of significant investigative information;

- Comply with the rules of the RC Commission;

- Grant the RC Compact privilege to a holder of an active home state license and otherwise meet the applicable requirements of the RC Compact in a member state; and

- Complete a criminal background check for each new licensee at the time of initial licensure as set forth in the RC Compact.

The RC Compact authorizes member states to charge a fee for granting and renewing an RC Compact privilege.

RC Compact Privilege

The RC Compact requires respiratory therapists to meet certain educational, service of process, and credentialing criteria to exercise RC Compact privileges and aligns RC Compact privilege with the underlying valid home state license, including renewal criteria.

Active-duty Military Personnel or Their Spouses

The RC Compact allows active-duty military personnel or their spouses to designate a home state where such service member or spouse has a current license in good standing and will allow such military personnel or spouse to retain that home state designation during the period of time the service member is on active duty.

The RC Compact does not require active-duty military personnel or their spouses to pay any additional fee that may be required by either the RC Commission or a remote state that may charge for an RC Compact privilege. A remote state may offer a reduced fee or no fee to active-duty military personnel or their spouses.

Adverse Actions

The RC Compact allows a member state to take adverse action against a licensee's RC Compact privilege in such member state and to issue subpoenas. Only the licensee's home state will have the power to take adverse action against the license issued by the home state or to offer alternative programs in lieu of adverse actions; participation in an alternative program will remain non-public if required by the home state's laws. However, a member state will have the authority to take adverse action based on the factual findings of another remote state if the other member state follows its own procedures for adverse actions. Member states will be permitted to recover costs of investigations or dispositions if permitted by their state law. The RC Compact will authorize joint investigations and will require sharing of certain information by member states of licensees during said investigations.

Establishment of the Respiratory Care Interstate Compact Commission

The RC Compact creates the RC Commission and includes provisions relating to membership, voting, powers and duties, and financing of the RC Commission. The RC Compact establishes the Executive Committee, which will have the power to act on behalf of the RC Commission according to the terms of the RC Compact.

The RC Compact provides for the RC Commission to pay for the reasonable expenses of its establishment, organization, and ongoing activities. The RC Commission is authorized to levy and collect an annual assessment from each member state and impose fees on licensees of member states to cover the cost of operations. The RC Compact requires the RC Commission to have an annual financial review by a certified public accountant and include the financial review in the RC Commission's annual report.

The RC Compact provides for the qualified immunity, defense, and indemnity of its members, officers, Executive Director, employees, and agents acting within the scope of RC Commission employment, duties, or responsibilities. The protections will not apply for damage,

loss, injury, or liability caused by the individual's intentional, willful, or wanton misconduct. The RC Compact will not limit the liability of any licensee for professional malpractice or misconduct governed by applicable state laws.

The RC Compact will not waive any member states' state action immunity or state action affirmative defense with respect to antitrust claims under the Sherman Act, Clayton Act, or any other state or federal antitrust or anticompetitive law or regulation. Nothing in the RC Compact will be construed to be a waiver of sovereign immunity by the member states or by the RC Commission.

Data Systems

The RC Compact requires the RC Commission to develop, maintain, operate, and utilize a coordinated database and reporting system. The RC Compact will govern how the information will be provided to the data system by member states and the use of the data by member states, as well as its designation of information that could not be shared with the public without the express permission of the contributing state. The RC Compact also requires removal of expunged information from the data system.

Rulemaking

The RC Compact authorizes the RC Commission to exercise rulemaking powers. The bill requires notice of proposed rules to specified persons and locations to be provided at least 30 days prior to the meeting where the RC Commission will consider such rules. Additionally, the RC Commission is required to provide notice of the public hearing, provide access to the meeting, and record all hearings. The RC Compact states a majority of legislatures of the member states could reject a rule by enactment of a statute or resolution within four years of adoption of the rule. The RC Compact also provides for emergency rulemaking procedures.

Oversight, Dispute Resolution, and Enforcement

The RC Compact provides that the executive and judicial branches in each member state will enforce and implement the RC Compact. The RC Compact establishes judicial venue and service of process for the RC Commission. The RC Compact also establishes a process to be followed by member states regarding default, requesting technical assistance, or termination from the RC Compact. The RC Compact will require the RC Commission, upon member request, to resolve disputes arising among member states and between member states and non-member states. In addition, the RC Commission is authorized to enforce the provisions of the RC Compact, and, by majority vote, could initiate legal action in federal court against a member state.

Effective Date, Withdrawal, and Amendment

The RC Compact states that the RC Compact will take effect on the enactment date, which is defined as the date that the statute is enacted into law by the seventh member state. [*Note:* As of July 15, 2026, the RC Compact has been enacted in 13 states: Alabama, Delaware, Iowa, Kansas, Kentucky, Montana, Nebraska, South Dakota, Tennessee, Virginia, Washington,

West Virginia, and Wisconsin. The RC Compact is being considered in Pennsylvania and Ohio.] Any member state will be allowed to withdraw from the RC Compact by enacting a statute that would repeal the RC Compact, but this would not take effect until 180 days after the enactment of the repealing statute. Member states could amend the RC Compact, but any amendment will not be effective until it is enacted by all member states. Additionally, the RC Compact does not invalidate or prevent any licensure agreement or cooperative arrangement between a member state and non-member state that did not conflict with the RC Compact.

Construction and Severability

The RC Compact states the RC Compact and the RC Commission's rulemaking authority shall be liberally construed and the provisions of the RC Compact will be severable.

Consistent Effect and Conflict with Other State Laws

The RC Compact does not prevent the enforcement of any other law of a member state not inconsistent with the RC Compact. Laws in conflict with the RC Compact will be superseded to the extent of the conflict, and all lawful actions of the RC Commission are binding upon member states.

Esthetics Licensure Compact

Purpose

The purpose of the Esthetics Compact will be to facilitate the interstate practice of esthetics with the goal of improving public access to esthetics services and achieving a number of objectives that reduce administrative burden while increasing licensure and mobility of licensed estheticians as well as cooperation among states' licensing bodies.

The Esthetics Compact preserves the regulatory authority of states to provide services through the current system of state licensure while also providing license portability for qualifying professionals through a multistate licensing system.

Definitions

The Esthetics Compact defines various terms, including:

- "Commission" means the joint government agency whose membership consists of all states that have enacted this compact, known as the Esthetics Licensure Compact Commission (Esthetics Commission) and which operates as an instrumentality of the member states;

- "Esthetician" means an individual licensed in such individual's home state to engage in the practice of esthetics;

- "Esthetics" means skin care and services for cosmetic purposes provided by an esthetician in a member state as set forth in the relevant statutes and regulations of a member state. The practice of esthetics occurs in the member state where the client is located at the time of service;

- "Home state" means the member state that is a licensee's primary state of residence and where that licensee holds an active and unencumbered license to practice esthetics; and

- "Multistate license" means a license issued and subject to the enforcement jurisdiction of the licensing authority in a licensee's home state that authorizes the practice of esthetics in member states and includes authorizations to practice esthetics in all remote states pursuant to this compact.

State Participation in the Esthetics *Compact*

To be eligible to join the Esthetics Compact, member states must:

- License estheticians and regulate esthetics;

- Have a mechanism or entity in place to receive and investigate complaints about licensees practicing in that state;

- Require licensees within the state to pass a competency examination prior to being licensed to provide esthetics services to the public;

- Require licensees to satisfy educational or training requirements in esthetics services to the public prior to being licensed;

- Implement a procedure to consider applicants' criminal history, disciplinary history, or background check, which could include submission of information by applicants for the purpose of obtaining a background check on the applicant;

- Participate fully in the data system, including the use of unique identifying numbers;

- Share information regarding adverse actions against a licensee with the Commission and other member states, both through the data system and otherwise;

- Notify the Esthetics Commission and other member states of the existence of investigative information or current significant investigative information in the state's possession regarding a state's licensee;

- Comply with the rules of the Esthetics Commission; and

- Accept licensees from other member states that have met the terms of the Esthetics Compact.

The Esthetics Compact authorizes member states to charge a fee for granting a mulitistate license to practice esthetics. Under the Esthetics Compact, member states retain sole jurisdiction over the educational or professional requirements regarding the licensing requirements to practice esthetics in a member state.

Multistate License

The Esthetics Compact requires an applicant for multistate licensure to hold an active and unencumbered single-state license to practice esthetics in the applicant's home state. If an applicant meets the educational and credentialing criteria to have a multistate license, the Esthetics Compact requires the state licensing authority to grant a multistate license within a reasonable amount of time. The Esthetics Compact requires that a licensee practicing in a member state adhere to that state's laws and regulations relating to esthetics as well as the jurisdiction of the state licensing authority and the courts of the member state.

Reissuance of a Multistate License by a New Home State

The Esthetics Compact allows a licensee to have only one multistate license, issued by their home state, at any given time. The Esthetics Compact provides a procedure to change a licensee's home state license when relocating between member states. The Esthetics Compact will permit a licensee to hold a single-state license in multiple states as well as a home state license and one multistate license for purposes of the Esthetics Compact. The Esthetics Compact will not interfere with the requirements established by a member state for the issuance of a single-state license.

Authority of the Esthetics Compact Commission and Member State Licensing Authorities

The Esthetics Compact will not limit, restrict, or in any way reduce the ability of a member state to enact and enforce laws, rules, or regulations related to the practice of esthetics that are not inconsistent with the Esthetics Compact. Member states will be expected to cooperate with the Esthetics Commission. The Esthetics Compact requires that discipline to be the sole responsibility of the state where esthetics services are provided. Member states will be required to communicate with each other regarding complaints and adverse actions.

Adverse Actions

The Esthetics Compact will allow a member state to take adverse action against a licensee's multistate license in such member state and to issue subpoenas. Only the licensee's home state will have the power to take adverse action against the license issued by the home state. For the purposes of taking adverse action, the home state's licensing authority could act on a report of conduct received from a remote state as though such conduct occurred within the home state, and the home state will apply its own state laws. The Esthetics Compact will also allow joint investigations by member states of licensees. Member states will be permitted to recover costs of investigations or dispositions if permitted by their state law.

The Esthetics Compact will require a licensee's home state to promptly report the conclusions of any investigation to the data system. If an adverse action is taken by the home state, the multistate license will be deactivated in all member states until all encumbrances are removed from the home state license. The home state will be authorized to accept a licensee's participation in an alternative program in lieu of adverse action. A multistate license will be suspended for the duration of the participation in the alternative program.

Active-duty Military Personnel or Their Spouse

The Esthetics Compact will allow active-duty military personnel or their spouses to designate a home state where such service member or spouse has a current license in good standing and will allow such military personnel or spouse to retain that home state designation while the service member is on active duty.

Establishment and Operation of the Esthetics Licensure Compact Commission

The Esthetics Compact creates the Esthetics Commission and includes provisions relating to membership, voting, powers and duties, and financing of the Esthetics Commission. The Esthetics Compact also establishes the Executive Committee, which will have the power to act on behalf of the Commission according to the terms of the Esthetics Compact.

The Esthetics Compact provides for the Esthetics Commission to pay for the reasonable expenses of its establishment, organization, and ongoing activities. The Esthetics Commission will have authority to levy and collect an annual assessment from each member state and impose fees on licensees of member states to cover the cost of operations. The Esthetics Compact will require the Commission to adopt an annual report and provide the report to member states.

The Esthetics Compact provides for the qualified immunity, defense, and indemnity of its members, officers, employees, and representatives of the Esthetics Commission acting within the scope of Esthetics Commission employment, duties, or responsibilities. The protections will not apply for damage, loss, injury, or liability caused by the individual's intentional, willful, or wanton misconduct. The Esthetics Compact will not limit the liability of any licensee for professional malpractice or misconduct governed by applicable state laws.

Data Systems

The Esthetics Compact requires the Esthetics Commission to develop, maintain, operate, and utilize a coordinated database and reporting system. The Esthetics Compact will govern how the information will be provided to the data system by member states, the use of the data by member states, and designation of information that could not be shared with the public without the express permission of the contributing state. The Esthetics Compact will also require removal of expunged information from the data system.

Rulemaking

The Esthetics Compact authorizes the Esthetics Commission to exercise rulemaking powers. The Esthetics Compact will require notice of proposed rules to specified persons and location where the Esthetics Commission will hear public comments to be provided at least 30 days prior to the meeting where the Esthetics Commission will consider such rules. Additionally, the Esthetics Commission will be required to provide notice of the public hearing and provide access to the meeting and record all hearings. If a majority of legislatures of the member states reject a rule by enactment of a statute or resolution within four years of adoption of the rule, the rule will have no further force and effect. The Esthetics Compact also provides for emergency rulemaking procedures.

Oversight, Dispute Resolution, and Enforcement

The Esthetics Compact provides that the executive and judicial branches in each member state will enforce and implement the Esthetics Compact. The Esthetics Compact establishes judicial venue and service of process for the Esthetics Compact Commission. The Esthetics Compact also establishes a process to be followed by member states regarding default, requesting technical assistance, or termination from the Esthetics Compact. The Esthetics Compact requires the Esthetics Commission, upon member request, to resolve disputes arising among member states and between member states and non-member states. In addition, the Esthetics Commission will be allowed to enforce the provisions of the Esthetics Compact, and, by majority vote, could initiate legal action in federal court against a member state.

Effective Date, Withdrawal, and Amendment

The Esthetics Compact will be effective on the date on which the Esthetics Compact statue is enacted into law in the seventh member state. [*Note:* As of June 6, 2026, the Esthetics Compact has been enacted in Alabama, Kansas, and Virginia.]

Any member state will be allowed to withdraw from the Esthetics Compact by enacting a statute that would repeal the Esthetics Compact, but this will not take effect until 180 days after the enactment of the repealing statute. Member states could amend the Esthetics Compact, but any amendment will not be effective until it is enacted by all member states. Additionally, the Esthetics Compact will not invalidate or prevent any licensure agreement or cooperative arrangement between a member state and non-member state that does not conflict with the Esthetics Compact.

Construction and Severability

The Esthetics Compact and the Esthetics Commission's rulemaking authority will be required to be liberally construed and the provisions of the Esthetics Compact will be severable.

Consistent Effect and Conflict with Other State Laws

The Esthetics Compact will not prevent the enforcement of any other law of a member state that is not inconsistent with the Esthetics Compact. Laws in conflict with the Esthetics Compact will be superseded to the extent of the conflict and all lawful actions of the Esthetics Commission will be binding upon member states.

Athletic Trainer Licensure Compact

Purpose

The purpose of the AT Compact is to facilitate the interstate mobility of athletic training practice with the goal of improving public access to services and achieving a number of objectives that reduce administrative burden while increasing availability of licensed athletic trainers as well as cooperation among member state licensing bodies.

The AT Compact preserves the regulatory authority of participating states to protect public health and safety through the current system of state licensure while also providing license portability for qualifying professionals.

Definitions

The AT Compact defines 31 terms used throughout the Compact, including:

- "Athletic training" means the prevention, examination, assessment, treatment, and rehabilitation of emergent, acute, or chronic injuries and medical conditions as defined by applicable member state laws and regulations;

- "Athletic Training Compact Commission" or "Commission" means the government agency whose membership consists of all states that have enacted this Compact, which is known as the Athletic Trainer Licensure Compact Commission, and which shall operate as an instrumentality of the member states to administer and implement the Compact according to its terms;

- "Compact qualifying license" means a license that is not an encumbered license issued by a member state to practice athletic training that qualifies the licensee to exercise a Compact privilege; and,

- "Scope of practice" means the procedures, actions, and processes an athletic trainer licensed in a state is permitted to undertake in that state and the circumstances under which the licensee is permitted to undertake those procedures, actions, and processes. Such procedures, actions, and processes and the circumstances under which they may be undertaken may be established through means, including, but not limited to, statute, regulations, case law, and other processes available to the state licensing authority or other government agency. "Scope of practice" will include any state requirements regarding

supervision or direction, if required by the state and as further defined by the state's statutes and regulations.

State Participation in the Compact

The AT Compact requires member states to:

- Enact and maintain a statute that is not materially different from the model compact language;
- License and regulate the practice of athletic training;
- Require that licensees in that state maintain continuing competence standards as part of their state practice act or rules;
- Have a mechanism in place for receiving and investigating complaints concerning licensees;
- Grant the compact privilege to a licensee who meets all the requirements of the Compact;
- Participate fully in the Commission's data system, including using the unique identifier as defined in rules;
- Notify the Commission of any adverse action or the availability of current significant investigative information regarding a licensee;
- Implement or utilize procedures for considering the criminal history records of applicants for an AT Compact qualifying license. These procedures include the submission of fingerprints or other biometric-based information by applicants for the purpose of obtaining a criminal history record from the Federal Bureau of Investigation and the comparable state agency for Compact licensees; and
- Comply with and enforce the rules of the AT Commission.

The AT Compact authorizes member states to charge a fee for issuance and renewal of a Compact privilege. Nothing in the Compact will affect the requirements established by a member state for the issuance of a single-state license and each Compact qualifying license issued will be recognized by each remote state.

Compact Privilege

The AT Compact requires a licensee to complete a criminal background check performed by the licensing authority in the state of qualifying licensure prior to entry into the Compact and meet certain certification or education requirements and licensure, fee, reporting, and credentialing criteria to exercise Compact privileges. The Compact also aligns Compact

privilege with requirements of the state of qualifying licensure, including renewal criteria and supervision requirements. The Compact requires that a licensee practicing in a remote state adhere to the remote state's laws and regulations, including scope of practice related to providing athletic training.

Compact-qualifying License

The AT Compact allows a licensee to have only one Compact-qualifying license at a time. The AT Compact does not require that the state of qualifying licensure be the state of primary residence or state of primary practice for the licensee. The Compact will not restrict a licensee from holding a single-state license in multiple states or affect the requirements established by member states for the issuance of a license other than a Compact-qualifying license.

Active Military Personnel or Their Spouses

The AT Compact will not require active-duty military personnel or their spouses to pay to the Commission for a Compact privilege. If a member state chooses to a charge a fee, the member state could choose to charge a reduced fee or no fee to active-duty military personnel or their spouses for a Compact privilege.

Adverse Actions

The AT Compact allows a member state to take adverse action against a licensee's Compact privilege in that member state and to issue subpoenas. Only the member state that has issued a licensee's Compact-qualifying license will have the authority to take adverse action against the license. However, a member state will have the authority to take adverse action based on the factual findings of another remote state if the other member state follows its own procedures for adverse actions.

Subpoenas could be issued by an athletic training licensing authority in a member state, and the member state may request service of that subpoena by another member state. The issuing authority will pay witness fees, travel expenses, mileage, and other required fees. Member states will be permitted to recover costs of investigations or dispositions if permitted by their state law. Member states will be required to promptly report the conclusions of any investigation to the administrator of the data system. The Compact will authorize joint investigations of licensees by member states.

Establishment and Operation of the Commission

The AT Compact creates the AT Commission and includes provisions relating to membership, voting, powers and duties, and financing of the Commission. The Compact establishes the Executive Committee, which will have the power to act on behalf of the Commission according to the terms of the Compact. Each member state's licensing authority must appoint a commissioner to the AT Commission within 60 days of the member state's effective date of the Compact.

The AT Compact requires the AT Commission to pay or provide for the reasonable expenses of its establishment, organization, and ongoing activities. The Commission will be authorized to levy and collect an annual assessment from each member state and impose fees on other parties of member states to cover the cost of operations. The Compact provides authority for the Commission to conduct financial reviews and audits, assess and collect fees, establish a budget and make expenditures, and perform other functions as necessary or appropriate to achieve the purposes of the Compact. The Commission is required to adopt and provide an annual report to member states as well as be subject to an annual financial review or audit by a certified or licensed public accountant.

The AT Compact provides for the qualified immunity, defense, and indemnity of its members, officers, executive director, employees, and representatives acting within the scope of AT Commission employment, duties, or responsibilities. The protections will not apply for damage, loss, injury, or liability caused by the individual's intentional, willful, or wanton misconduct.

Data Systems

The AT Compact requires the Commission to develop, maintain, operate, and utilize a coordinated database and reporting system containing licensure, Compact privilege, adverse action, and the presence of current significant investigation information on all licensees and applicants for license in a member state. The Compact governs how the information will be provided to the data system by member states and the use of the data by member states, as well as its designation of information that could not be shared with the public without the express permission of the contributing state. The Compact will also require removal of expunged information from the data system.

Rulemaking

The AT Compact authorizes the AT Commission to exercise rulemaking powers. The bill requires notice of proposed rules to specified persons and locations to be provided at least 30 days prior to the meeting where the Commission will consider such rules. Additionally, the Commission will be required to provide notice of the public hearing, provide access to the meeting, and record all hearings. The Compact states a majority of legislatures of the member states could reject a rule by enactment of a statute or resolution within four years of adoption of the rule. The Compact also provides for emergency rulemaking procedures.

Oversight, Dispute Resolution, and Enforcement

The AT Compact provides that the executive and judicial branches in each member state will enforce and implement the Compact. The Compact establishes judicial venue and service of process for the Commission. The Compact also establishes a process to be followed by member states regarding default, requesting technical assistance, or termination from the Compact. The Compact requires the Commission, upon member request, to resolve disputes arising among member states and between member states and non-member states. In addition, the Commission is authorized to enforce the provisions of the Compact, and, by two-thirds majority vote, initiate legal action in federal court against a member state.

Effective Date, Withdrawal, and Amendment

The AT Compact will be effective on the date on which the Compact statute is enacted into law in the seventh member state. [*Note*: The Compact had been enacted in Alabama, Iowa, Kansas, Kentucky, Nebraska, South Dakota, and Virginia as of July 15, 2026. Legislation was pending in seven states: Delaware, Minnesota, Missouri, New Jersey, Ohio, Oklahoma, and Pennsylvania.]

Any member state will be allowed to withdraw from the AT Compact by enacting a statute that would repeal the Compact, but this would not take effect until 180 days after the enactment of the repealing statute. Withdrawal from the Compact will not end the continuing requirement to comply with the investigative and adverse action reporting requirements prior to the effective date of withdrawal.

Additionally, the AT Compact will not invalidate or prevent any licensure agreement or cooperative arrangement between a member state and nonmember state not in conflict with the Compact.

Construction and Severability

The Compact states the AT Compact and the AT Commission's rulemaking authority will be liberally construed and the provisions of the Compact will be severable.

Consistent Effect and Conflict with Other State Laws

The AT Compact will not prevent the enforcement of any other law of a member state not inconsistent with the Compact. Laws in conflict with the Compact will be superseded to the extent of the conflict.