December 11, 2023

Re: Public Comments (compiled and summarized) regarding *rules on definitions* and *rules on data system development*

Comment period: November 8 – December 8, 2023

* **Comments on *rules on definitions***
  + Need to define the meaning of unencumbered license
  + Need to define the meaning of encumbered license
* **Comments on *rules on data system development***
  + Public should not be allowed to have access to personal information
    - To access information about therapists’ licenses, individuals should have to apply to get that information; it should not be publicly available
  + Modify section 2.1.B.1 (e, f, g) to remove the following personally identifiable information (PII) data sets to be provided by states
    - Birth date
    - Social security number
    - Home state address
  + Some states have code/statutes that prohibits the disclosure of sensitive PII of licensees, including social security numbers, and therefore it is not stored in state databases.
  + Licensees’ addresses are often unreliable, as licensees often do not update their addresses in the state databases.
  + There are concerns about the security of the transfer of this data and the related potential liability to the states; it is less of an issue if only public information is transmitted.
  + The rules should address the disposition of the data when it is no longer applicable, for example, when a home state license has expired