



# ***Interstate Medical Licensure Compact***

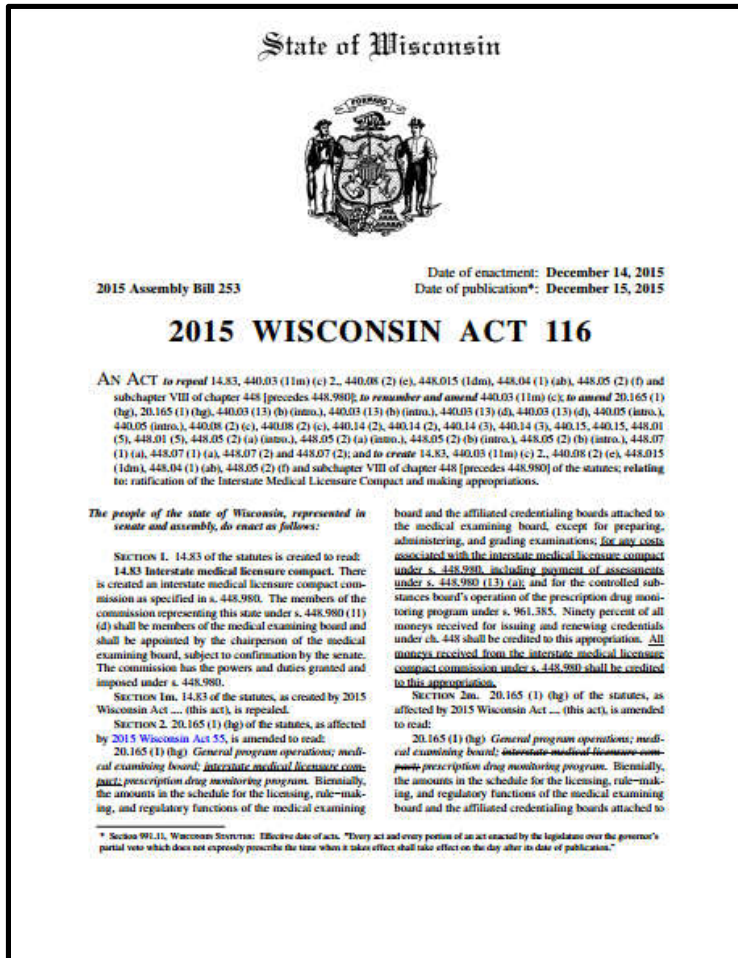
***Matthew Stanford***



**WISCONSIN HOSPITAL  
ASSOCIATION, INC.**

# Physician Licensure Compact

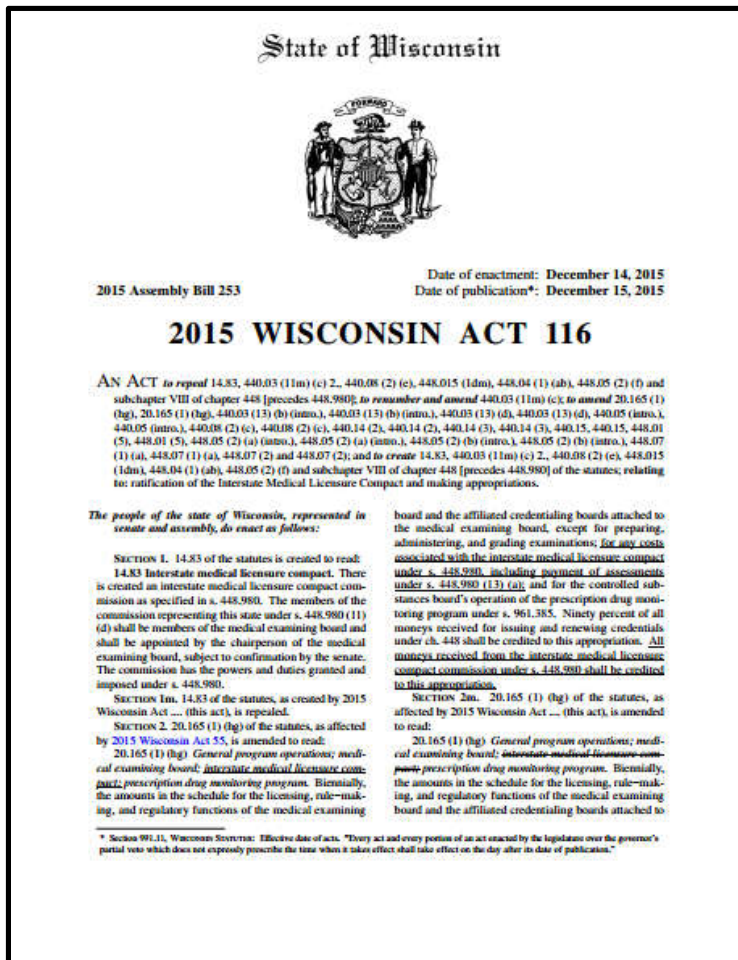
## What is the Compact?



- Creates an alternative, voluntary and expedited path for many physicians with a medical license in good standing to receive a Wisconsin medical license.
- Traditional licensees will not be impacted by the bill and can still choose to be licensed through that process.
- **Reduce red tape** – For eligible physicians, will reduce the amount of redundant paperwork necessary to be licensed in Wisconsin.
- **Increase access** – By reducing the amount of time to receive a Wisconsin license, eligible physicians can more quickly begin practicing in Wisconsin communities.
- Since being introduced nationally late in 2014, 21 states have enacted including Iowa, Minnesota, and Illinois.

# Physician Licensure Compact

## A WHA Policy Advocacy Priority



- WHA Physician Leaders Council provided key guidance in 2014 that led to addition of Wisconsin implementation safeguards in bill (e.g., peer review, fees, ensuring voluntary participation.)
- **WHA ADVOCACY DAY PRIORITY: Garner co-sponsors for physician licensure compact. Most co-sponsors to any bill at that time**
- WHA's Matthew Stanford testified with Gordy Lewis, CEO Burnett Medical Center in Grantsburg.
- WHA HEAT contacts generated for Health Committees.
- Gundersen Health System, Mayo Health System, Medical College of Wisconsin, and Wisconsin Medical Society all testified in support.

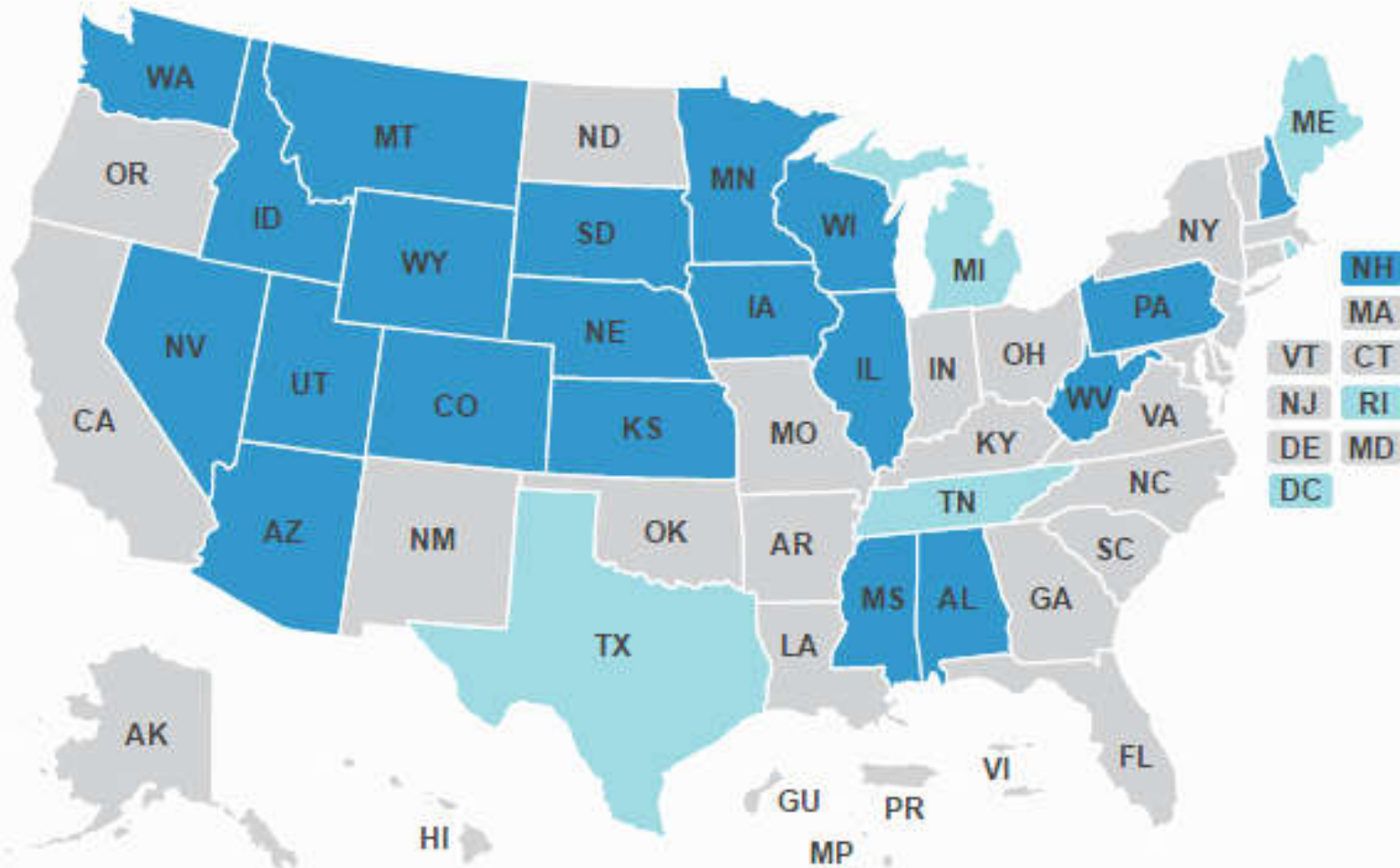
# Interstate Medical Licensure Compact

Singed into law as 2015 Wisconsin Act 116!





# 21 states are now a part of the Compact



 = Compact legislation enacted  
 = Compact legislation introduced



## **Timeline for implementation**

- October 2015 – Interstate Commission first convenes to begin developing infrastructure to establish the expedited licensure process.
- December 2015 - Wisconsin joined the Compact
- September 2016 – Interstate Commission began promulgating procedures to implement the expedited licensure process.
- April 2017 –Interstate Commission activated online expedited licensure process under the Compact.
  - <http://www.imlcc.org/>
- By December 2019 – Wisconsin must enact legislation reauthorizing the Compact.

# Interstate Medical Licensure Compact

- Key elements of the Compact language:
  - Jurisdiction
  - Eligibility for an expedited license
  - Application process for an expedited license.
  - Fees
  - Required reports
  - Investigations and disciplinary actions

# Interstate Medical Licensure Compact

## • ***Jurisdiction:***

- Practice of Medicine occurs where the patient is located at the time of the encounter.
- Compact creates another pathway for licensure and does not otherwise changes a state's existing Medical Practice Act
- State boards retain jurisdiction to impose an adverse action against a license to practice medicine in the state, even if issued through the Compact.



# Interstate Medical Licensure Compact

## • *Eligibility for an expedited license:*

- Hold a full, unrestricted license in a Compact state.
- Graduate of LCME, COCA, or international medical school and passed each level of the USMLE or COMLEX exam within 3 attempts.
- Successfully complete an ACGME or AOA approved graduate medical education.
- Hold a recognized specialty certification or time-unlimited specialty certificate.
- No felony or gross misdemeanor convictions.
- Never held a license in ANY state subject to discipline (except for nonpayment of fees).
- Never had a DEA license suspended or revoked.
- Not under active investigation by board or law enforcement in any state, federal or foreign jurisdiction.



**How does one receive an expedited license  
under the Compact?**



- **In short....**

- ***Apply for and get a Letter of Qualification through the Interstate Medical Licensure Commission.***

- ***Pay \$700 non-refundable service fee.***

- ***Other Compact states rely on the Letter of Qualification to individually issue an expedited license for that state without redundant primary source verification***

- ***Pay the licensure fee for each Compact state the physician wishes to receive a license***

- ***Receive a license from each requested state.***

## Interstate Medical Licensure Compact

### • ***Application process (generally):***

- Physician must designate a Compact state as the state of “principle license” to receive an expedited license.
- The “principle license” state must be one of the following:
  - State of primary residence
  - State in which at least 25% of practice of medicine occurs.
  - State in which the physician’s employer is located.
  - State is the state of residence for US federal income tax purposes.
- The physician files an online application (and service fees) for expedited license that is forwarded to with the state of “principle license.”
- “Principle license” state board evaluates whether eligible for expedited licensure and issues a letter of qualification to the “Interstate Commission.”

## Interstate Medical Licensure Compact

### • *Application process (generally):*

- If the “principle license” state has already done primary source verification of education, examination or other qualifications, additional primary source verification is not required.
- After verification of eligibility, and payment of state licensure fees, a Compact member state shall issue an expedited license.
- An expedited license is valid for the same period and in the same manner as required for other licenses held in the state.

# Interstate Medical Licensure Compact

## • *Fees*

- State issuing a license may impose a fee for an expedited license.
- Interstate Commission will collect fees on a state's behalf for initial expedited licenses and renewals.
- Interstate Commission is in the process of developing rules regarding fees for renewals of expedited licenses.
- Interstate Commission may levy assessments on Compact states, but has been working to avoid that.



# Interstate Medical Licensure Compact

## • *Fees*

### • Current fees:

- One-time \$700 service fee to process a letter of qualification (the application to be deemed eligible for expedited licenses in any Compact state)
  - \$400 to Interstate Commission
  - \$300 forwarded by Interstate Commission to State of Principle Licensure that is verifying eligibility and issuing the letter of qualification.
- For each state the physician is seeking licensure, the physician will pay the state's expedited licensure fee.
  - Collected by the Interstate Commission and forwarded to each state
- \$100 service fee to Interstate Commission for subsequent requests for expedited licensure (does not apply to renewal requests)
- TBD service fee for renewals of an expedited license, in addition to the state's renewal fee.

# Interstate Medical Licensure Compact

## • ***Application process (step-by-step):***

- Complete the “QUALIFICATIONS APPLICATION” which goes through the eligibility requirements

[https://imlcc.org/wp-content/uploads/2017/04/Qualifications\\_Application.pdf](https://imlcc.org/wp-content/uploads/2017/04/Qualifications_Application.pdf)

- Complete the “AFFIDAVIT AND AUTHORIZATION FOR RELEASE OF INFORMATION FOR APPLICATION FOR AN IMLC LETTER OF QUALIFICATION AND MEDICAL LICENSES IN IMLC MEMBER STATES.”

[https://imlcc.org/wp-content/uploads/2017/04/Affidavit\\_and\\_Consent.pdf](https://imlcc.org/wp-content/uploads/2017/04/Affidavit_and_Consent.pdf)

- Gather the information on the “CORE DATA SHEET.”

- Ex. Demographic information, SSN, NPI, Medical School name and completion, residency information, licensing exam info, state licensure information, etc.

[https://imlcc.org/wp-content/uploads/2017/04/Core\\_Data\\_Sheet.pdf](https://imlcc.org/wp-content/uploads/2017/04/Core_Data_Sheet.pdf)

# Interstate Medical Licensure Compact

## • *Application process (step-by-step):*

- Begin the online application for a letter of qualification
  - Go to IMLCC.ORG
  - APPLY NOW - <http://www.imlcc.org/applynow/>
  - You will be asked to select a STATE OF PRINCIPLE LICENSURE
    - State of primary residence
    - State in which at least 25% of practice of medicine occurs.
    - State in which the physician's employer is located.
    - State is the state of residence for US federal income tax purposes
  - You will be asked to provide the information in the:
    - QUALIFICATIONS APPLICATION
    - CORE DATA SHEET
- To complete the application for a letter of qualification, you must submit a non-refundable application fee of \$700.00

# Interstate Medical Licensure Compact

## • ***Application process (step-by-step):***

- Upon payment of the \$700 fee and completion of the online application for the Letter of Qualification, the Interstate Medical Licensure Commission will forward the application to the designated State of Principle Licensure
- State of Principle Licensure will:
  - Review the application and determine if eligibility qualifications are met.
  - Conduct primary source verification of the required eligibility criteria for expedited licensure.
  - Provide instructions to the applicant for obtaining fingerprints for a criminal background check.
  - Issue a “letter of qualification” to the applicant and Interstate Commission, verifying or denying the applicant’s eligibility for a Compact expedited license.

# Interstate Medical Licensure Compact

## • ***Application process (step-by-step):***

- After receiving the “Letter of Qualification” from the State of Principle Licensure, the physician may now select the Compact states in which the physician wishes to receive an expedited license.
  - Through the IMLCC, identify the members state(s) for which expedited licensure is requested.
  - Through the IMLCC, pay the non-refundable licensure fee required by each member board for which expedited licensure is requested.
- If the physician requests additional expedited licenses AFTER the initial completion and dissemination of the Letter of Qualification, then an additional \$100.00 service fee shall be charged for each subsequent dissemination of the Letter of Qualification.
- A Letter of Qualification expires 365 days after issuance.

## Interstate Medical Licensure Compact

- ***Application process (step-by-step):***

- Upon receipt of the state's licensure fees and Letter of Qualification from the IMLCC, a Compact state's medical board "shall promptly issue a full and unrestricted license to the applicant."





**Are there other differences between a license granted through the Compact process vs. the normal licensure process?**

# Interstate Medical Licensure Compact

## • *Licensure renewals*

- A physician seeking to renew an expedited license shall complete a renewal process with the IMLC. (TBD)
- Requirements:
  - Maintains full and unrestricted license in state of principle licensure
  - No felony or gross misdemeanor convictions.
  - Never held a license in ANY state subject to discipline (except for nonpayment of fees).
  - Never had a DEA license suspended or revoked.
  - Must comply with the state's applicable CME requirements.
- Fees
  - Payment of each state's renewal fee
  - TBD IMLCC service fee.

## Interstate Medical Licensure Compact

### • ***Required reports to the Interstate Commission***

- Compact states shall report to the “Interstate Commission”:
  - Any public action or complaints against a physician who has applied or received an expedited license.
  - Any disciplinary or investigatory information determined necessary and proper by the “Interstate Commission.”
  - Complaint or disciplinary information about a physician upon the request of another member board.

## Interstate Medical Licensure Compact

### • *Required reports to the Interstate Commission*

- Compact states shall report to the “Interstate Commission”:
  - Any amendment to the “core data set”:

- |  |  |
|--|--|
| <ul style="list-style-type: none"><li>• Eligibility information</li><li>• Name(s)</li><li>• Gender</li><li>• Date of birth</li><li>• NPI</li><li>• SSN</li><li>• Address, telephone, email</li></ul> | <ul style="list-style-type: none"><li>• Verification of medical degree and school</li><li>• Verification of residency accreditation</li><li>• Specialty board certification</li><li>• License #, date and expiration date of any member state license.</li></ul> |
|--|--|

# Interstate Medical Licensure Compact

## • *Investigations and discipline*

- States may participate in joint investigations of physicians licensed by the Compact states.
- Subpoenas issued by a Compact state shall be enforceable in other Compact states.
- Compact states may share investigative, litigation, or compliance materials in furtherance of any investigation.
- Compact states may investigate violations of medical practice states in other Compact states.

# Interstate Medical Licensure Compact

## • *Investigations and discipline*

- Language in the “Information Practices” rule of the Commission states:

*The Commission is prohibited by the Compact from providing **any and all licensure, complaint, disciplinary and investigatory information** maintained in the coordinated information system, including a core data set, to any individual, entity or organization **other than a member state board.***



# Interstate Medical Licensure Compact

## • *Investigations and discipline*

- Discipline taken by any Compact state shall be deemed unprofessional conduct in all Compact states in which a physician has an expedited license.
- A revocation/surrender or indefinite suspension of a license in the “Principle” state, shall result in the same in any Compact state.
- A revocation/surrender or indefinite suspension of a license in a “non-Principle” state, shall result in an automatic 90 day suspension in any Compact state

# Interstate Medical Licensure Compact

## • *Investigations and discipline*

- While revocation/surrender/suspension automatically applies in all states, a reinstatement in one state does not automatically result in reinstatement elsewhere.
- Actions by Compact states may be deemed “conclusive as to matter of law and fact decided” in other Compact states.

## WI Implementation Language

- Clarify that only MDs that acquire a “Compact license” – not all WI license holders - are subject to the Compact’s mandated reports.
- Clarify that out-of-state subpoena power in the Compact applies only to “Compact license” holders and only from Compact states’ MEBs – not any person in a Compact state that may issue a subpoena under their law.
- Clarify that “joint investigations” made pursuant to the Compact by WI MEB are permitted only against MDs with a “Compact license.”
- = • Segregate the MEB’s Compact related expenses from the MEB’s expenses paid pursuant to regular MD license fees. MEB may charge fees to Compact licensees to cover all costs. =



**Questions?**

