

**Interstate
Medical Licensure
Compact**

The Expedited Pathway to Medical Licensure

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Why create a Physician Compact?

The IMLC process provides the answer to the simple question:

“What are the common standards of licensure that can be primary source verified by one board and accepted by many?”

Compact Overview

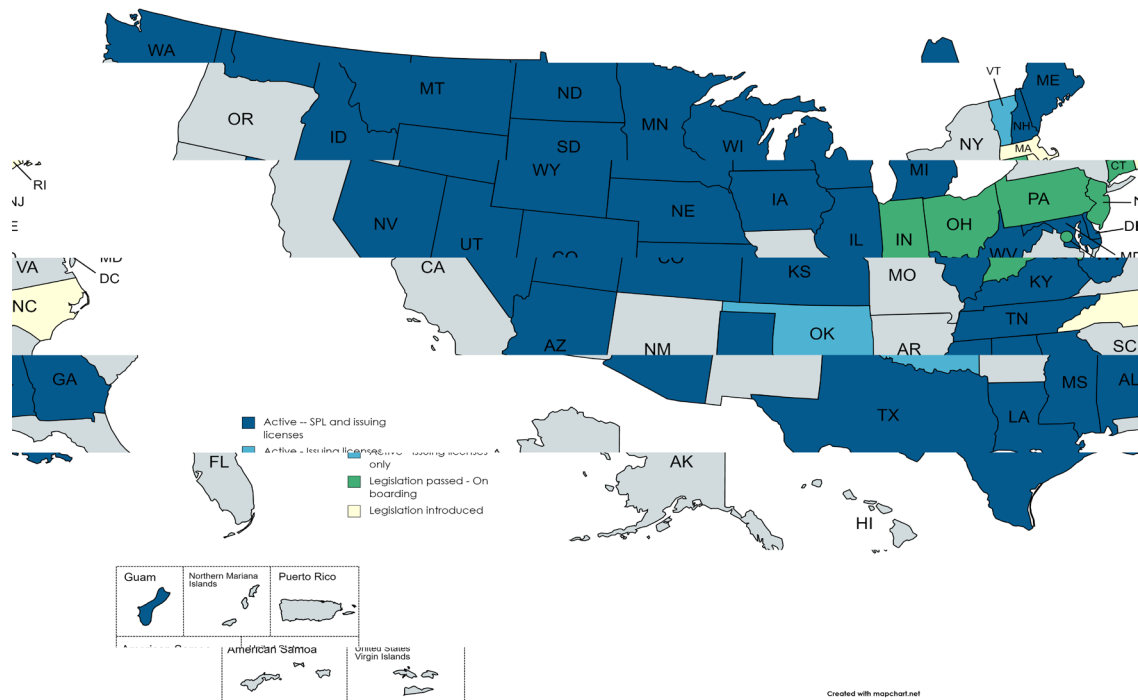
- The IMLCC process is available to physicians:
 - Doctors of Osteopathy (DO)
 - Doctors of Medicine (MD)
- The IMLCC provides an expedited process for physicians to obtain a full, unrestricted license from a member state.
- The license is issued by the member state's board and is subject to that state's practice of medicine requirements.
- The IMLCC is a governmental instrumentality controlled and governed by the member states. There is no outside control or governance.
- The IMLCC became a legal organization in April 2015 when Alabama became the 7th authorizing state.
- The first application was processed April 7, 2017 and the first license using the compact process was issued 13 days later.

Compact Administration

- It is a statutorily established governmental instrumentality, as recognized by IRS code § 115.
- The IMLCC is “created” by each member board state when legislation is passed and signed by the governor. This action makes the IMLCC a discretionary state function – i.e. a part of that state’s government.
- Once the legislation is passed, each member state selects 2 commissioners as part of the IMLCC’s governance structure.
- The IMLCC has rulemaking authority established in the initial legislation, which is binding on the member states.
- An Executive Committee is comprised of an elected Chair, Vice Chair, Immediate Past Chair and Treasurer, with the Executive Director acting as Secretary, and the chairs of the IMLCC standing committees:
 - Budget
 - Communications
 - Personnel
 - Rules & Administrative Procedures
 - Technology

Compact Participation

Member States



Status

- Active – SPL and issuing licenses
 - AL, AZ, CO, DE, GA, GU, IA, ID, IL, KS, KY, LA, MD, ME, MI, MN, MS, MT, ND, NE, NH, NV, SD, TN, TX, UT, WA, WI, WV, WY
- Active – Issuing licenses only
 - OK, VT
- Legislation passed – On boarding
 - CT, DC, IN, NJ, OH, PA
- Legislation introduced
 - MA, NC, RI

Compact Eligibility Steps

Step #1 – State of Principal License selection requirements

- HOLD a full, unrestricted medical license in a Compact Member state (AL, AZ, CO, DE, GA, GU, IA, ID, IL, KS, KY, LA, MD, ME, MI, MN, MS, MT, ND, NE, NH, NV, SD, TN, TX, UT, WA, WI, WV, WY)
- MEET at least one of the four following requirements:
 - Your principal residence is in the SPL
 - At least 25% of your practice of medicine occurs in the SPL
 - Your employer is located in the SPL
 - You use the SPL as your state of residence for U.S. federal income tax purposes

Compact Eligibility Steps – Continued

Step #2 – The 9 Common Standards

1. Medical School Accreditation: LCME, COCA, IMED
2. No more than 3 attempts at USMLE or COMLEX-USA steps
3. Graduate Medical Education accreditation by ACGME or AOA
4. ABMS or AOA-BOS including time-unlimited certificates
5. No prior convictions or criminal activity
6. No history of licensure actions
7. Clean DEA history
8. No active investigations
9. **Must pass FBI Criminal Background Check**

Compact Fees

IMLCC Fees

- The IMLCC application fees is \$700.00 at the time of application
 - \$300.00 of the fee is paid to the State of Principal License
 - \$400.00 of the fee is paid to the IMLCC
- Additional License fee is \$100.00 to add licenses to an active LOQ
- For renewals to fee is \$25 plus the renewal fee charged by the member board.

Member Board Fees

- Actual fees for initial and renewal (OH = \$308.50 and \$308.50)

Compact Processing Data

Sliced 3 different ways

Data #1 - Cumulative Numbers

- April 1, 2017 to May 31, 2022
 - Applications Processed = 23,926
 - Licenses Issued = 36,661

Data #2 - By Calendar Year

2017

- Applications Processed = 553
- Licenses Issued = 745

2018

- Applications Processed = 2,216
- Licenses Issued = 3,767

2019

- Applications Processed = 3,402
- Licenses Issued = 3,768

2020

- Applications Processed = 5,166
- Licenses Issued = 7,385

2021

- Applications Processed = 6,995
- Licenses Issued = 12,195

2022 – January to May

- Applications Processed = 5,594
- Licenses Issued = 8,801

Data #3 – Covid Impact

- 12-month Pre-Covid (March 2019 to February 2020)
 - Applications Processed = 3,738
 - License Issued = 3,877
- 12-month Covid-19 Pandemic (March 2020 to February 2021)
 - Applications Processed = 5,282
 - Licenses Issued = 8,126

Scope of Practice

The IMLCC process has authority over the licensing process.

INTERSTATE MEDICAL LICENSURE COMPACT SECTION 1. PURPOSE

In order to strengthen access to health care, and in recognition of the advances in the delivery of health care, the member states of the Interstate Medical Licensure Compact have allied in common purpose to develop a comprehensive process that complements the existing licensing and regulatory authority of state medical boards, provides a streamlined process that allows physicians to become licensed in multiple states, thereby enhancing the portability of a medical license and ensuring the safety of patients. The Compact creates another pathway for licensure and does not otherwise change a state's existing Medical Practice Act. The Compact also adopts the prevailing standard for licensure and affirms that the practice of medicine occurs where the patient is located at the time of the physician-patient encounter, and therefore, requires the physician to be under the jurisdiction of the state medical board where the patient is located. State medical boards that participate in the Compact retain the jurisdiction to impose an adverse action against a license to practice medicine in that state issued to a physician through the procedures in the Compact.

Disciplinary Actions

- A physician who has a record of a disciplinary action that has been reported to the Nation Practitioner Data Bank (NPDB) loses eligibility to continue in the compact – at a minimum no licenses can be renewed
- IMLCC Statute authorizes Joint Investigations between member boards
- IMLCC Statute authorizes the sharing of investigative, litigation, or compliance information with other member boards
- Disciplinary action taken by the State of Principal License (SPL) to revoke, surrender or relinquish in lieu of discipline is deemed by all member boards to be conclusive as to the matter of law and fact decided, with each member board then taking a similar action
- Disciplinary action taken by a member board, not the SPL, may be used by other member boards to deemed as action conclusive as to the matter of law and fact decided and
 - Impose the same or lessor sanction(s), or
 - Pursue a separate action under its respective Medical Practice Act.

Compact Processes - Details

1. Initial Licensure – online process via imlcc.org

- The physician initiates the application by selecting the “APPLY” tab – then follows the steps on the webpage to determine if using the IMLCC process benefits them and the requirements to qualify. After reviewing the steps, the physician selects “START THE *INITIAL LICENSE APPLICATION*” to begin the process.
- The physician completes the IMLCC online application, which has 7 steps:
 - Qualification
 - Education
 - Background
 - Core Data
 - Affidavit/Consent/Electronic Signature
 - Payment
 - Application Complete
- The physician makes their \$700.00 payment using an embedded webpage at Step #6.
- The physician can complete the application in one setting or can save and return to the application. Inactivity will cause the account to close and require the physician to return to their account, then work from the point of last saved information.
- The completed application is recorded in the physician’s application IMLCC’s system - iStarsII.
- The SPL receives notice via email that an application has been submitted and action is required. This notice is simultaneous with the completion of the application.
- The SPL reviews the IMLCC application data and verifies the accuracy of the information from primary source data in its system. An FBI criminal background check is also performed. Corrections to the information provided by the physician in the application are made by the SPL in the online application. The SPL’s corrections are saved and a copy of the updated application is sent to the physician applicant.

Compact Process – Details - Continued

1. Initial Licensure - CONTINUED – online process via imlcc.org
 - A physician who does not qualify to use the IMLCC expedited process, as determined by the SPL, is notified of this decision and provided the contact information of the SPL should the physician wish to appeal that decision. There are 3 reasons reported to the IMLCC:
 - Did Not Qualify
 - Eligibility Could Not Be Determined From Application Submitted
 - Deemed Withdrawn
 - A physician who does qualify is issued a “Letter of Qualification” or LOQ. The LOQ is valid for 365 days from the date it is issued. The physician is notified via email that an LOQ has been issued. The physician is provided a link or can log into their account, the physician then selects the states from whom they wish to obtain a license.
 - Part of the Selection of States involves payment by the physician for the cost of the license as determined by the member board. The member board receives 100% of the license fee.
 - Once the Selection of States application is complete and fees paid, the member boards selected are notified via email with a link into the account that will allow them to review the Letter of Qualification and Completed Application.
 - The selected member board issues a full, unrestricted license to the physician and updates the license information in the iStarsII system. The physician is notified via email that the licenses have been issued.
 - Once all the requested licenses have been issued, the application is classified as “Complete”.

Compact Process – Details – Continued

2. Additional selections – online process via imlcc.org

- A physician with a valid LOQ can request licenses from additional member board states after the initial Selection of States. The physician hits the “ADD STATES” tab, after reviewing the qualifying information scrolls to the bottom of the webpage and selects the “GO TO ADD STATES” button.
- The physician selects the states from whom they wish to obtain a license, pays the license fees charged by those states plus the \$100 additional license application fee.
- If the LOQ is valid, the application is processed and after the Addition of States application is complete and fees paid, the member boards selected are notified via email with a link into the account that will allow them to review the Letter of Qualification and Completed Application.
- The selected member board issues a full, unrestricted license to the physician and updates the license information in the iStarsII system.
- The physician is notified via email that the licenses have been issued.
- There are no restrictions on the number of times a physician can make additional selections.

Compact Process – Details – Continued

3. Renewal – online process via imlcc.org

- The member board provides notice to the physician via email, not less than 90 days prior to the expiration date. The email contains, at a minimum, the expiration date, a link to the IMLCC webpage, and the renewal fee amount due, plus any applicable late fees.
- The physician initiates the renewal by selecting the “RENEW” tab. Reviews the qualification requirement, has an option to review the renewal documents, the hits the “GO TO LICENSE RENEWAL” BUTTON.
- Completes the renewal application, which is an 8 step process. The member board’s renewal fee amount is added by the system and if a late fee is owed the physician enters that amount. The IMLCC \$25.00 renewal fee is also automatically added to the amount owed.
- Once the Renewal application is complete and fees paid, the member board is notified via email with a link into the account that will allow them to review the renewal application.
- The member board completes the renewal process and renews the license, updating the iStarsII system of the new license information.
- The physician is notified via email that the license has been renewed.

Questions?

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Webpage – IMLCC.org