In July of 2015 we noted that nine states had enacted laws to join the Interstate Medical Licensure Compact (IMLC). We described this cooperative program intended to allow physicians to obtain expedited licenses to practice in multiple states. This would facilitate the delivery of telemedicine across state lines; physicians are generally prohibited from practicing, even remotely, in states in which they are not licensed.

In our last post, we noted that enough states had approved the Compact for an Interstate Medical Licensure Compact Commission (Commission) to be formed to promulgate bylaws for licensure. Since then, nine more states have enacted legislation joining the IMLC including, most recently, Pennsylvania. As more states joined, a Commission was indeed formed.

Recently, the Commission issued a proposed rule for “expedited licensure” and met to set a target goal of January 2017 for the finalization and implementation of that rule. Although the Commission has not yet finalized the rule, because the implementation date is fast approaching, we have summarized the likely procedure for expedited licensure.

Most importantly, the Commission plans to create an online application for expedited licensure. The Commission will then transmit that information to the
relevant state(s). In addition, the proposed rule describes the requirements to receive an expedited license, which include licensing and educational standards. Applicants who have been convicted of various kinds of misconduct will not be eligible for expedited licensure.

In order to apply for an expedited license from a new state, an applicant will simply submit an online application (including service fees) to the Commission and then submit a fingerprint packet or other biometric data sample and provide a sworn statement attesting to the truthfulness of all of the information provided to the state in which the applicant is currently licensed. The Commission will request that the state in which the applicant is licensed issue a letter of qualification to the applicant and the Commission. Upon receipt of the letter of qualification, the Commission will issue a full and unrestricted license to the applicant to practice in participating states.

Physicians who would like to engage in practice outside of the states where they are currently licensed should check to see if the IMLC applies in the states in which they are licensed and in the states where they would also like to practice. This procedure will probably be available soon and will probably make applications for licensing significantly easier. It is also worth noting that there are many states still considering adopting the IMLC, including Michigan which has active legislation on the topic.

*Jack Lund is the author of this article.*

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