



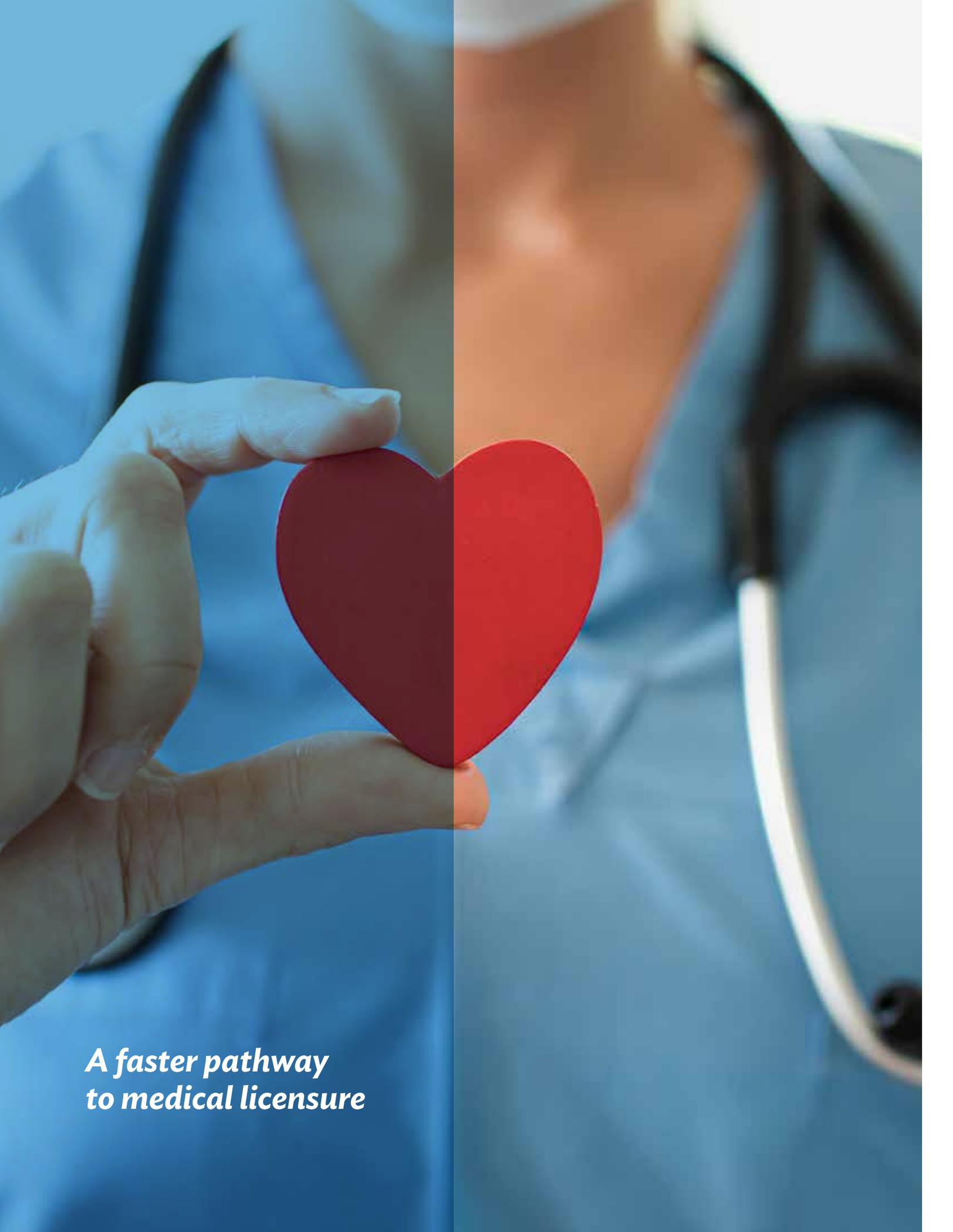
FY2023
ANNUAL
REPORT



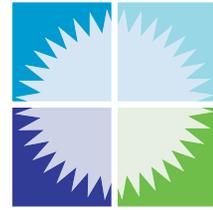
**Interstate
Medical Licensure
Compact**

Submitted by the Interstate Medical Licensure Compact Commission

Michael Rodman, Communications Committee Chair
Marschall Smith, Executive Director



*A faster pathway
to medical licensure*

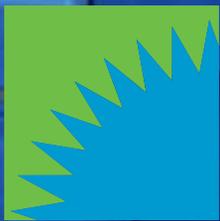
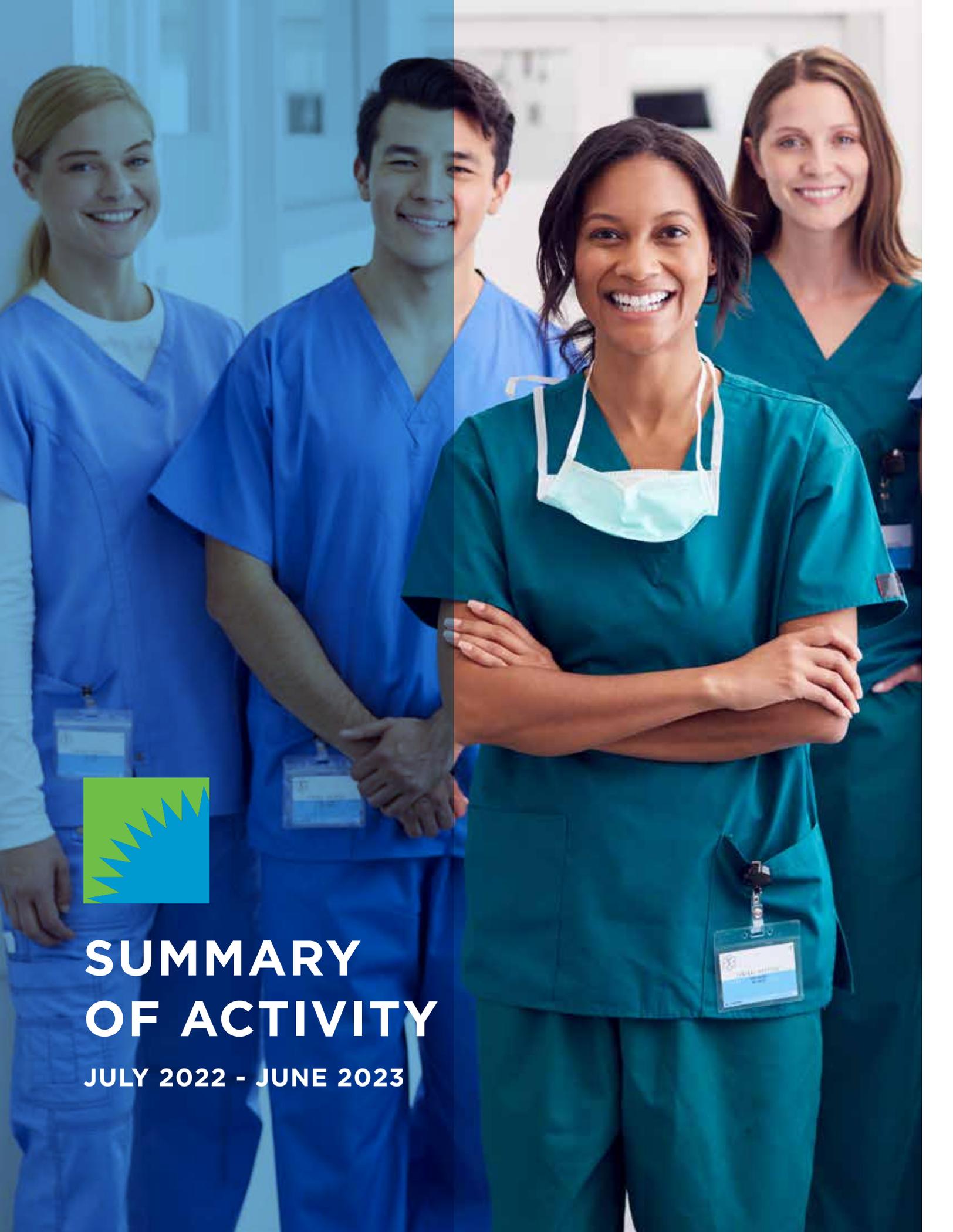


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Two important terms used throughout this document:

- The Interstate Medical Licensure Compact, aka IMLC, represents the process and activities related to the organization in general and as established in statute.
- The Interstate Medical Licensure Compact Commission, aka IMLCC, represents the actions and activities of the compact’s commissioners and staff.



SUMMARY OF ACTIVITY

JULY 2022 - JUNE 2023

The Interstate Medical Licensure Compact Commission (IMLCC) celebrated its 6th year of operations in April 2023 and the 10th year from the inaugural discussion about forming a compact for physicians hosted by the Federation of Medical Boards. Those anniversary dates mark the evolution of an idea about creating an expedited pathway to address critical physician shortages in states to thriving, expanding enterprise where over 70,000 new licenses have been issued to physicians by 47 member boards.

The passing of time has also created opportunities to study the data and gather information about the impacts of the IMLCC on the licensure process in states. The recently published data study shows that over 17% of all new licenses issued to physicians in 2022 were done via the IMLC process. Additional data studies show that the member boards continue to process the applications quickly and effectively, with the average time between requesting a license and issuance is 7 to 10 days, with some boards issuing requested licenses in 48 hours. The process is safe, effective, and reliable. Out of over 52,000 Letters of Qualification issued by member boards, only 22 were later determined to be invalid. An incredible testament to the work and dedication of the member board staff who process the applications.

Much activity and discussion has taken place about the “Dobbs decision” and how that might impact the physician trust in using the IMLCC process. The IMLCC remains apolitical in the discussion about the practice of medicine but firmly committed to the federalist principal that each member state has the sovereign authority to regulate and enforce its regulations about how medicine is practiced within its state’s borders. License portability, a key aspect of why the IMLCC exists, relies on the understanding and the protections provided to physicians who obtain multiple licenses to practice in different states. Physicians, who are at the “tip of the spear” in these discussions, trust the IMLCC’s requirements and the state law protections provided in the IMLC statute and rules. Best demonstrated by the volume of license requests in both “blue and red” states – the number of license requests has nearly doubled year over year and the trend is anticipated to continue.

Fiscal Year 2023 was a year marked by challenges accepted and goals accomplished. Fiscal Year 2024 looks to hold much the same. The IMLCC staff are dedicated to the purpose of the IMLCC and the success of our member boards, processing partners, and most importantly, the physicians we all serve.

PROCESSING VOLUME FOR FY2023



BUDGET REPORT

The IMLCC FY2024 budget was approved by the Executive Committee at its May 16, 2023 meeting. A copy of the original and amended budgets are available on the IMLCC webpage at <https://www.imlcc.org/imlc-commission/budgets/>

The IMLCC will not levy or assess fees to member states for FY2024. The IMLCC has never levied or assessed fees to member states and remains fiscally sound with reserves sufficient to cover at least 24 months of operating expenses.

EXECUTIVE DIRECTOR REPORT

The IMLCC has changed the process by which physicians obtain licenses. It is a revolutionary action that has been made possible through the hard work of member board licensing staff and board leadership. A recent data study has shown that in calendar year 2022 over 17% of all the new licenses obtained by physicians in the US were through the IMLC process and over 31% of the new licenses issued by member states were through the IMLC process. This change of processing will continue to increase as more states join the IMLCC.

An interesting revelation from the data study is that the number of new licenses issued by member states grew through the IMLC process, but they also demonstrated a steady growth in the licenses issued through the traditional or state-based process as well. Documentation shows that the IMLCC is helping our member states address their physician shortages. Physicians, hospital systems, and states continue to find new ways to utilize the IMLC process to address the individual needs of their states.

The IMLC staff has grown, and we moved our office in October to a space that will accommodate our staffing needs for the short and long term. We anticipate that we will grow from our current level of 12 to 15 over the course of the next year.

Efforts to expand the IMLCC into the remaining 11 states and 3 territories continues as partners are found to sponsor the bills. The information available through data studies, which factually demonstrate the claims made, show that the IMLCC brings high quality physicians to states and increases patient access to quality care. Over 35% of the licenses obtained are used by physicians in rural and underserved areas. The wealth of data and information from our member boards will continue to be gathered and published.

A recent data study has shown that in calendar year 2022 over 17% of all the new licenses obtained by physicians in the US were through the IMLC process and over 31% of the new licenses issued by member states were through the IMLC process.

FISCAL YEAR	APPLICATIONS PROCESSED	LICENSES ISSUED
FY2017	125	81
FY2018	1,447	2,220
FY2019	2,698	3,980
FY2020	4,430	4,578
FY2021	5,560	10,198
FY2022	10,832	17,973
FY2023	19,147	30,691



2022 ANNUAL MEETING

The IMLCC held its seventh annual meeting, both in-person and virtually in Gulf Shores, Alabama on November 8, 2022. The meeting included a rulemaking hearing, that amended IMLC Rules Chapter 6. The changes to Chapter 6 added paragraph 6.6, which clarified each board’s authority to regulate and control the license issued by their board, including those issued through the IMLC process. The minutes from the meeting can be found on the IMLC webpage at <https://www.imlcc.org/imlc-commission/public-notices-agendas-and-minutes/>. The 2023 annual meeting was held in Denver, Colorado on November 14, 2023.

OTHER IMLCC MEETINGS

The Commissioners met on May 16, 2023 to approve the FY2024 budget and to discuss the draft Physician Associate Compact. Minutes from the meeting can be found on the IMLCC webpage at <https://www.imlcc.org/imlc-commission/public-notices-agendas-and-minutes/>.

RULEMAKING AND POLICY DEVELOPMENT

The Commission made the following decisions regarding rules and policy development.

Rules adopted: None

Rules amended: IMLC Rule – Chapter 6 – amended to add paragraph 6.6

Bylaws adopted or amended: None

Policies adopted: None

Policies amended: None

Advisory Opinions issued or amended: None

OUTREACH AND EDUCATIONAL ACTIVITIES

The IMLCC Staff and Commissioners provided orientation training, onboarding instructions, and detailed operational discussion with the following boards:

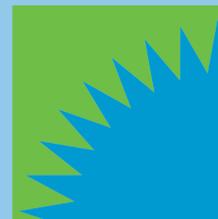
- Alabama Board of Medical Examiners and Medical Licensure Commission
- Alaska State Medical Board
- Colorado Medical Board
- Connecticut Medical Examining Board
- Delaware Division of Professional Regulation
- District of Columbia Board of Medicine
- Georgia Composite Medical Board
- Hawaii Medical Board
- Louisiana State Board of Medicine
- Maine Board of Licensure in Medicine
- Maine Board of Osteopathic Medicine
- Medical Licensing Board of Indiana
- Missouri Board of Registration for the Healing Arts
- Nevada State Board of Medical Examiners
- New Mexico Medical Board
- New York State Board of Regents
- New Jersey State Board of Medical Examiners
- North Carolina Medical Board
- Oregon Medical Board
- Pennsylvania State Board of Medicine
- State Medical Board of Ohio
- State of Wisconsin Medical Examining Board
- Vermont Secretary of State (DO Board)
- Virginia Board of Medicine
- Washington Medical Commission
- West Virginia Board of Medicine

The IMLCC staff participated in the following outreach and educational activities during FY2023:

- AMA – State Advocacy Summit
- American Society of Hematology Clinical News
- American Veterinary Medical Association

- Baton Health
- Bloomberg Press
- CE Broker
- Counsel of State Governments
- Compact Administrators Executive Director Forum
- CTel
- Dermatology World
- Everyday Life Foundation
- Federation of Podiatric Medical Boards
- Federation of State Medical Boards – Legal Roundtable
- Federation of State Medical Boards – Annual Meeting
- Fort Payne Pediatrics
- Fulgent Genetics
- General Court of Massachusetts
- Grassroot Institute of Hawaii
- Hawaii State Legislature
- Healthcare IT Leaders
- Interstate Healthcare Collaborative
- Jackson-Coker Healthcare
- Kaiser Permanente
- KNWA TV – Arkansas
- Medical Board Roundtable
- Mid-America Regional Council
- Missouri General Assembly
- Missouri Medical Society
- National Conference of State Legislatures
- New England Journal of Medicine
- New Mexico Health Care Workforce Committee
- New Mexico Legislature
- New Mexico Hospital Association
- New York Times
- North Carolina General Assembly
- Philadelphia Inquirer
- Pyramid Health Care – Pennsylvania
- Rutgers Health Policy Forum
- St. Elizabeth Physicians
- Sandrow Consulting
- SOC Telemed
- Vermont General Assembly
- Virginia General Assembly
- Virginia Hospital & Healthcare Association
- Virginia Medical Society

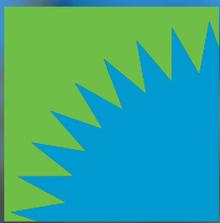
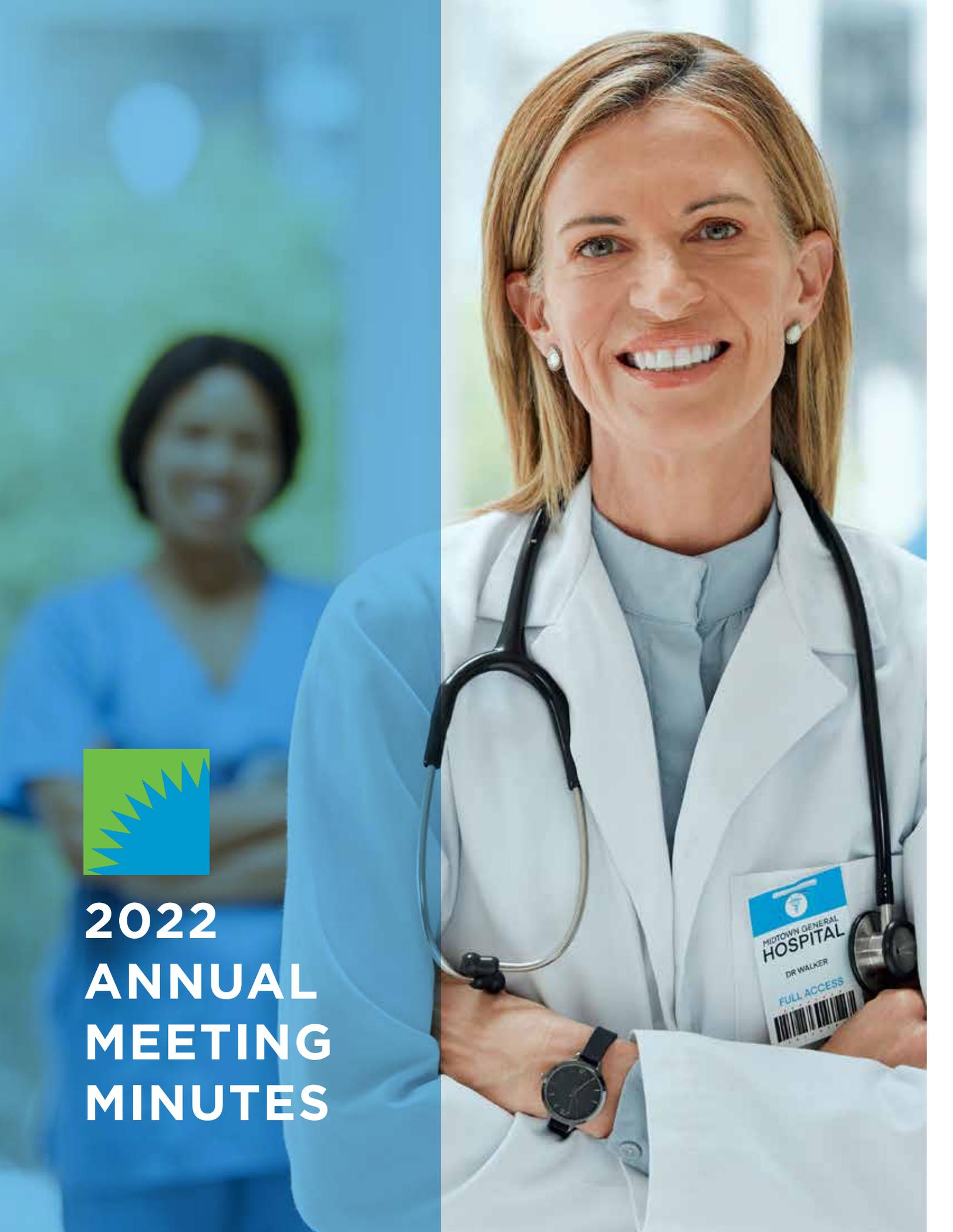
The latest information about the IMLC can be found by clicking on the “News” tab on our webpage at: <https://www.imlcc.org/>



FY 2022 AUDIT REPORTS

The IMLCC FY2022 audit reports were approved by the Budget Committee on behalf of the IMLCC at the committee’s March 15, 2022 meeting. The FY2022 Financial Statements document can be found by clicking [FY2022 Audit](#)

The Compact makes it possible to extend the reach of physicians, improve access to medical specialists, and leverage the use of new medical technologies, such as telemedicine.



**2022
ANNUAL
MEETING
MINUTES**



INTERSTATE MEDICAL LICENSURE COMPACT COMMISSION November 8, 2022

MEETING MINUTES

Call to Order | *Chair Spangler (WV)*

The Interstate Medical Licensure Compact Commission convened at approximately 11:00 AM Eastern time in Gulf Shores, Alabama and via video conference.

Roll Call | *Secretary Smith*

The roll was called, and a quorum was established.

Approval of the agenda | *Chair Spangler (WV)*

An agenda for the meeting was provided prior to the meeting.

- MOTION
- MOVED BY COMMISSIONER CLEVELAND (MS), SECONDED BY COMMISSIONER TERRANOVA (ME), TO APPROVE THE AGENDA.
- MOTION PASSED
- WITH 44 YES VOTES, 0 NO VOTES AND 0 ABSTENTIONS

Approval of the minutes | *Secretary Smith*

The minutes from the May 17, 2022 meeting were provided prior to the meeting.

- MOTION #1
- MOVED BY COMMISSIONER ESTEP (KS), SECONDED BY COMMISSIONER MARTINEZ (MN), TO APPROVE THE IMLCC COMMISSIONER MEETING MINUTES FROM MAY 17, 2022.
- MOTION PASSED
- WITH 44 YES VOTES, 0 NO VOTES, AND 0 ABSTENTIONS

Welcome and Keynote Speaker | *William Perkins, Executive Director, Alabama State Board of Medical Examiners & Peter Graham, Ph.D., Acumen Assessments*

Mr. Perkins welcomed the Commissioners to Alabama via pre-recorded video. Dr. Graham presented the keynote address titled “Orientation to Duty”. A discussion and a question-and-answer session was led by Dr. Graham.

Chair’s Report | *Chair Spangler (WV)*

The chair provided comments to the commissioners, highlighting the accomplishments during 2022, including the doubling of applications processed, completing 3 financial audits in a 12-month timeframe, the passage of enabling legislation in 4 states, with 4 states beginning active processing of applications.

The Compact is now a successful organization and an established method for physicians to obtain licenses quickly and effectively. All due to the hard work of board staff, Commissioners, and Commission staff.

Executive Director’s Report | *Executive Director Smith*

The executive director provided an update on the progress of the Compact, focusing on the impacts on the physician licensure process in the five years of the its operational existence. A roadmap of future activities and system improvements were outlined.

Report from Legal Counsel | IMLCC Legal Counsel Rick Masters

Mr. Masters requested that his report be conducted in a session closed to the public in order to provide legal advice.

- MOTION
- MOVED BY COMMISSIONER GILE (KS), SECONDED BY COMMISSIONER HERLIHY (VT), THAT THE MEETING BE CLOSED TO THE PUBLIC IN ORDER TO RECEIVE LEGAL ADVICE AS AUTHORIZED BY IMLCC STATUTE, SECTION 11, PARAGRAPH H.
- MOTION PASSED
- WITH 44 YES VOTES, 0 NO VOTES, AND 0 ABSTENTIONS

Meeting closed to the public

The meeting was closed. During this time the commissioners, IMLCC Executive Director and Legal Counsel were segregated into a private conference call room where no members of the public were included and members of the public retired from the meeting space and the room secured. The general conference call room remained active for members of the public. At the conclusion of the closed session, the private conference call room was emptied and the meeting resumed in public session.

**Working Lunch – New member board on-board process | IMLCC Operations
Manager David Clark**

Mr. Clark along with Ms. Trevino, Texas Medical Board Compact Program Supervisor, and Mr. Joseph Turek, State Medical Board of Ohio Director of Licensure and Licensee Services, led a discussion about how the Compact has developed a new member board on-boarding process that includes a test environment for board staff to work through the different types of applications. Mr. Trevino and Mr. Turek provided information about their board’s recent on-boarding experience.

Rulemaking Hearing | Commissioner Martinez (MN)

At 1:00 pm Central Time, the commission was called to order for the purpose of a rulemaking hearing as authorized by IMLCC Statute, Section 15. The rulemaking hearing was noticed and opportunity for comment was done in accordance with IMLC Rules, Chapter 1. The proposed rules were discussed and additional opportunity for comments from commissioners and the public were provided during the consideration of the proposed rule.

A copy of the proposed amendments to IMLC Rules – Chapter 6 were provided prior to the meeting. The change to IMLC Rule Chapter 6 was to add a new paragraph, 6.6.

The public hearing was closed at 1:05 pm Central Time after no requests from the public to provide comment were requested.

A discussion on the proposed amendments was led by Commissioner Martinez. Each commissioner who wished to provide a comment was provided that opportunity. Additionally, the three (3) written comments which were received prior to the meeting were read into the record. A copy of each will be recorded along with these minutes on the IMLCC webpage.

After the discussion the question was called and put to a vote.

- MOTION
- MOVED BY THE RULES AND ADMINISTRATIVE PROCEDURES COMMITTEE, A MOTION BY A COMMITTEE DOES NOT REQUIRE A SECOND, TO AMEND IMLC RULE CHAPTER 6 – RULE ON COORDINATED INFORMATION SYSTEM, JOINT INVESTIGATIONS AND DISCIPLINARY ACTIONS TO ADD PARAGRAPH 6.6.
- MOTION PASSED

— WITH 23 YES VOTES, 20 NO VOTES AND 1 ABSTENTION

The rulemaking hearing was concluded at approximately 2:45 pm Central Time.

Election of officers | Secretary Smith

Elections for the officers of the Commission were held in accordance of IMLCC Bylaws, Article III, Section 1. A call for nominations was held for each position, discussion held, nominations were then closed, and the nominations voted on by members as separate actions.

CHAIR

Commissioner Manahan (MN) nominated Commissioner Mark Spangler (WV) to the position of IMLCC Chair. The nomination was seconded by Commissioner Bohall (AZ). The nomination was accepted and discussion held. No other nominations were put forward.

RESULT

Commissioner Spangler (WV) was elected to the position of Chair by 100% of the members voting.

VICE CHAIR

Commissioner Terranova (ME) nominated Commissioner Christine Farrelly (MD) to the position of IMLCC Vice Chair. The nomination was seconded by Commissioner Marx (UT). The nomination was accepted.

Commissioner Cleveland (MS) nominated Commissioner Karen Silas (AL) to the position of IMLCC Vice Chair. The nomination was seconded by Commissioner Judd (TN). The nomination was accepted.

A discussion about the nominations was held and the question called.

RESULT

Commissioner Silas (AL) was elected to the position of Vice Chair by 65% of the members voting.

TREASURER

Commissioner Silas (AL) nominated Commissioner Cleveland (MS) to the position of Treasurer. The nomination was seconded by Commissioner Cousineau (NV). The nomination was accepted and discussion held. No other nominations were put forward.

RESULT

Commissioner Cleveland (MS) was elected to the position of Treasurer by 100% of the member voting.

Discussion Topic #1 | Secretary Smith

A discussion was held regarding the question “Should ex-officio members be voting members?” A discussion of the question was held and it was determined that the matter should be referred to the Rules & Administrative Procedures Committee for consideration and action.

— MOTION

— MOVED BY COMMISSIONER CLEVELAND (MS), SECONDED BY COMMISSIONER TERRANOVA (ME), TO REFER THE MATTER TO THE IMLCC’S RULES AND ADMINSTRATIVE PROCEDURES COMMITTEE FOR CONSIDERATION AND ACTION.

— MOTION PASSED

— BY A UNANOMOUS VOICE VOTE WITH NO ONE EXPRESSING OPPOSITION

Discussion Topic #2 | Secretary Smith

A discussion was held regarding the question “Should the Compact publish a rule regarding the sharing of non-disciplinary information between member boards?” A discussion of the question was held and it was determined that the matter should be tabled.

- MOTION
- MOVED BY COMMISSIONER BOHNENBLUST (WY), SECONDED BY COMMISSIONER RODMAN (KY), TO TABLE DISCUSSION.
- MOTION PASSED
- BY A UNANOMOUS VOICE VOTE WITH NO ONE EXPRESSING OPPOSITION

Discussion Topic #3 | Secretary Smith

A discussion was held regarding a request that the Rules and Administrative Procedures Committee consider and review IMLCC Rule Chapter 6 to ensure that it accurately reflects the IMLCC statute and provides clear guidance to member boards. A discussion was held and it was determined that the Commissioners wished to request that the Rules and Administrative Procedures Committee begin a review of IMLC Rule Chapter 6 as soon as it was practical.

- MOTION
- MOVED BY COMMISSIONER TERRANOVA (ME), SECONDED BY COMMISSIONER CLEVELAND (MS), TO REFER THE MATTER TO THE IMLCC’S RULES AND ADMINSTRATIVE PROCEDURES COMMITTEE FOR CONSIDERATION AND ACTION.
- MOTION PASSED
- BY A UNANOMOUS VOICE VOTE WITH NO ONE EXPRESSING OPPOSITION

Committee Reports

Treasurer Silas (AL) provided a brief Budget Committee report.
Commissioner Rodman (KY) provided a brief Communications Committee report.
Commissioner Herlihy (VT) provided a brief Personnel Committee report.
Commissioner Martinez (MN) provided a brief Rules and Administrative Procedures Committee report.
Commission Manahan (MN) provided a brief Technology Committee report.

Staff reports

Keyla Blanco, IMLCC Controller, provided a brief update about the IMLCC’s fiscal unit.
Dale Watts, IMLCC IT Manager, provided a brief update about the IMLCC’s IT unit.
David Clark, IMLCC Operations Manager, provided a brief update about the IMLCC’s Operations unit.

Public Comments | Chair Spangler (WV)

None were provided.

Location of the next annual commission meeting | Chair Spangler (WV)

The next meeting of Commissioners:

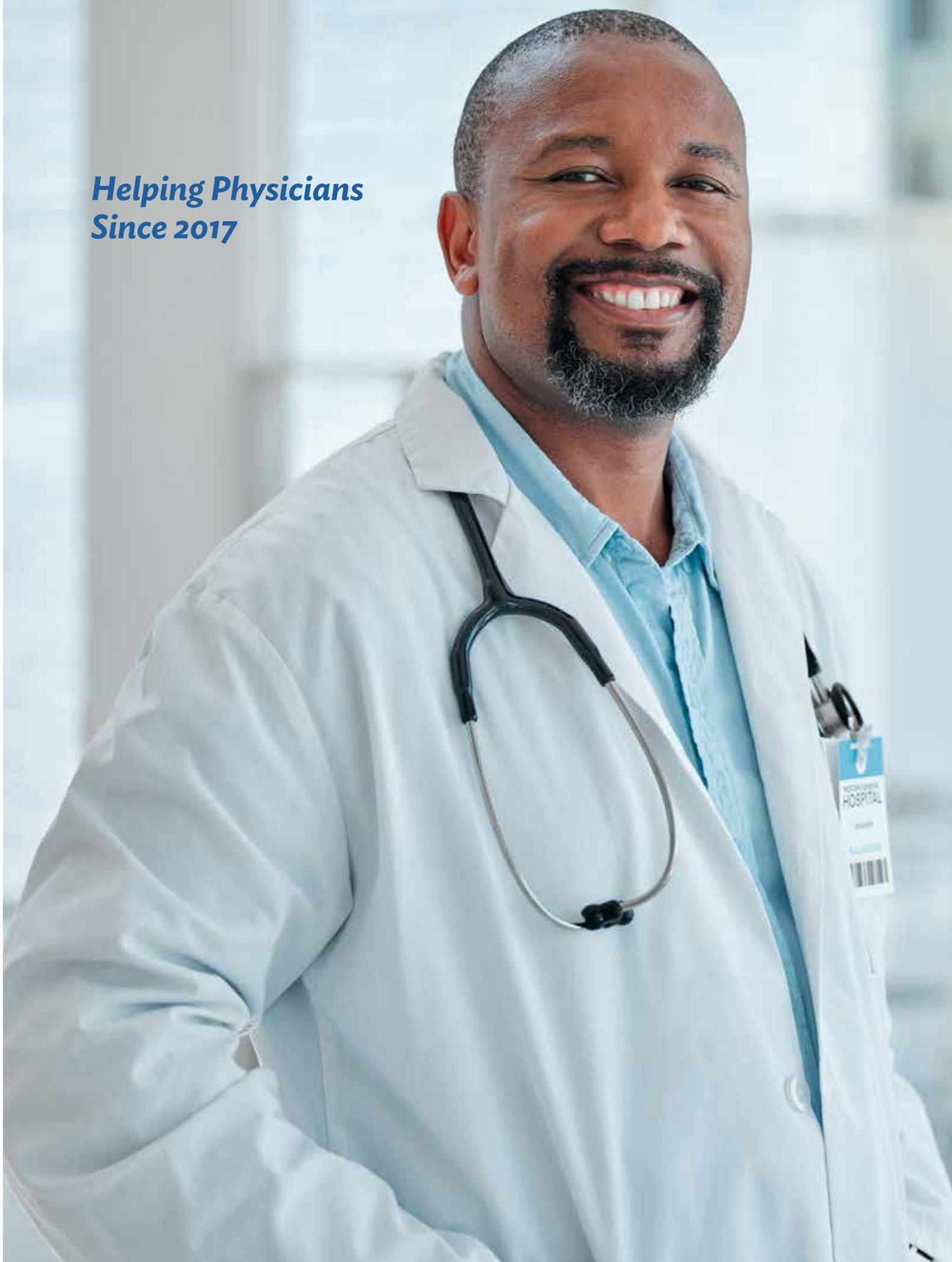
- May 2023 – a virtual meeting to review and finalize the IMLCC’s FY2024 budget.
- November 2023 – the annual in-person and virtual meeting in Colorado

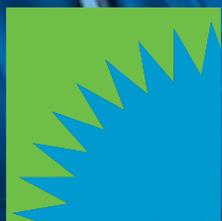
The specific dates and information about attending the meetings will be provided when it has been finalized.

Adjournment | Chair Spangler (WV)

There being no further business, the meeting was adjourned at approximately 3:55 pm Central Time.

*Helping Physicians
Since 2017*





**ROSTER OF
COMMISSIONERS**



ALABAMA

Commissioner Tiffany Seamon (9/16/2021)

Personnel Committee Member

Commissioner Karen Silas (5/20/2017)

*Vice Chair
Executive Committee Member*



ARIZONA

Commissioner Justin Bohall (11/15/2019)

*Rules & Administrative Procedures
Executive Committee Member*

Commissioner Patricia McSorley (6/1/2016)

Personnel Committee Member



COLORADO

Commissioner Roland Flores, MD (11/21/2022)

Personnel Committee Member

Commissioner Nate Brown (11/21/2022)

Budget Committee Member



CONNECTICUT

Commissioner Chris Andresen, MPH (9/29/2022)

Budget Committee Member

Appointment Pending



DELAWARE

Commissioner Shauna Slaughter (10/13/2022)

Budget Committee Member

Commissioner Joseph Ruback, III, D.O. (10/13/2022)

Communications Committee Member



DISTRICT OF COLUMBIA

Commissioner Aisha Nixon (7/18/2023)

Committee Assignment Pending

Appointment Pending

ROSTER OF COMMISSIONERS



GEORGIA

Commissioner Jeff Marshall, MDN
(5/20/2022)

Communications Committee Member

Commissioner Daniel Dorsey (2/21/2022)

Technology Committee Member



GUAM

Commissioner Kia Rahmani, MD
(11/20/2018)

Personnel Committee Member

Appointment Pending



IDAHO

Commissioner Mark Grajcar, DO
(5/28/2021)

Communications Committee Member

Commissioner Nicki Chopski (4/4/2022)

Personnel Committee Member



ILLINOIS

Commissioner Cecilia Abundis (10/11/2019)
Communications Committee Member

Appointment Pending



INDIANA

Appointment Pending

Appointment Pending



IOWA

Commissioner Dennis Tibben (5/2/2023)

Commissioner Dennis Tibben (5/2/2023)

**Commissioner Patricia Fasbender, DO
(11/4/2021)**

Committee Assignment Pending



KANSAS

**Commissioner Thomas Estep, MD
(12/13/2021)**

Communications Committee Member

Commissioner Susan Gile (10/08/2021)

*Rules & Administrative Procedures Committee
Member*



KENTUCKY

**Commissioner Michael S. Rodman
(6/20/2019)**

*Communications Committee Chair
Executive Committee Member*

**Commissioner Heidi M. Koenig, MD, FASA
(12/17/2020)**

Budget Committee Member



LOUISIANA

**Commissioner Vincent A. Culotta, Jr. MD
(12/2/2021)**

Technology Committee Member

Commissioner Lester Johnson MD (12/2/2021)

*Rules & Administrative Procedures
Committee Member*



MAINE

**Commissioner Timothy (Tim) E. Terranova
(8/8/2017)**

Communications Committee Member

Commissioner Susan E. Strout (10/12/2017)

Personnel Committee Member



MARYLAND

Commissioner Christine A. Farrelly
(5/25/2018)

Budget Committee Member

Commissioner Ellen Douglas Smith
(5/28/2018)

Technology Committee Member



MICHIGAN

Commissioner Dawn Gage (9/15/2021)

Technology Committee Member

Commissioner Michael Chafty, MD
(9/18/2019)

Personnel Committee Member



MINNESOTA

Commissioner Elizabeth Huntley
(3/29/2023)

Technology Committee Member

Commissioner John (Jake) M. Manahan
(11/18/2019)

Technology Committee Chair
Executive Committee Member



MISSISSIPPI

Commissioner Kenneth Cleveland, MD
(8/19/2019)

IMLCC Treasurer
Budget Committee Chair
Executive Committee Member

Commissioner Anna Boone (3/29/2021)

Personnel Committee Member



MONTANA

Commissioner James Burkholder
(11/21/2019)

Rules & Administrative Procedures Committee Member

Commissioner Samuel Hunthausen
(7/21/2021)

Technology Committee Member



NEBRASKA

Appointment Pending

Commissioner Maria Michaelis, MD
(3/25/2021)

Communications Committee Member



NEW HAMPSHIRE

Commissioner Michael Barr, MD (4/5/2017)

Technology Committee Member

Appointment Pending



NEW JERSEY

**Commissioner Paul Carniol, MD
(10/21/2022)**

Communications Committee Member

**Commissioner Chetan Shah, MD
(10/21/2022)**

Personnel Committee Member



NEVADA

**Commissioner Edward Cousineau, JD
(12/4/2015)**

Budget Committee Member

Commissioner Frank DiMaggio (10/1/2022)

*Rules & Administrative Procedures Committee
Member*



NORTH DAKOTA

Commissioner Lynette McDonald (9/12/2019)

Technology Committee Member

Commissioner Zena Homan, MD (8/2/2023)

Committee Assignment Pending



OHIO

Commissioner Stephanie Loucka (10/25/2021)

*Rules & Administrative Procedures Committee
Member*

**Commissioner Michael Schottenstein, MD
(10/25/2021)**

Communications Committee Member



OKLAHOMA

Commissioner Christi Aquino (10/18/2019)

Communications Committee Member

Appointment Pending



PENNSYLVANIA

Appointment Pending

Appointment Pending



RHODE ISLAND

Appointment Pending

Appointment Pending



SOUTH DAKOTA

Commissioner Margaret Hansen
(7/21/2015)

Rules & Administrative Procedures Committee Member

Commissioner Suzanne Veenis (8/28/2020)

Budget Committee Member



TENNESSEE

Commissioner Stacy Tarr (3/27/2022)

Rules & Administrative Procedures Committee Member

Commissioner Penny Judd (9/12/2018)

Budget Committee Member



TEXAS

Commissioner Devinder Bhatia
(6/10/2022)

Committee Assignment Pending

Commissioner Robert Martinez
(6/10/2022)

Committee Assignment Pending



UTAH

Commissioner Larry Marx (10/4/2016)

Rules & Administrative Procedures Committee Member

Appointment Pending



VERMONT

Commissioner David Herlihy (6/11/2020)

*Personnel Committee Chair
Executive Committee Member*

Commissioner Lauren Layman (5/16/2023)

*Rules & Administrative Procedures
Committee Member*



WASHINGTON

Commissioner Kyle Karinen, J.D. (7/28/2023)

Committee Assignment Pending

Commissioner Lisa Galbraith (11/2/2018)

Budget Committee Member



WEST VIRGINIA

Commissioner Jonathan T. Osborne (10/21/2021)

*Rules & Administrative Procedures
Committee Member*

Commissioner Mark A. Spangler (1/23/2017)

*IMLCC Chair
Executive Committee Member*



WISCONSIN

Commissioner Sheldon Wasserman (10/21/2020)

Communications Committee Member

Commissioner Clarence Chou (10/21/2020)

Personnel Committee Member



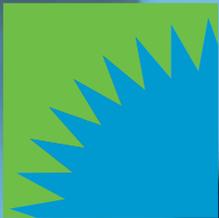
WYOMING

Commissioner Kevin Bohnenblust (7/30/2015)

Technology Committee Member

Commissioner Michael Jording (4/12/2022)

*Rules & Administrative Procedures
Committee member*



**RULES,
BYLAWS,
AND POLICY
CHANGE
SUMMARY**

During FY2023, there were no new Bylaws or Rules adopted by the Commission. However, there were two new policies adopted and two amendments made to existing rules.

New - IMLC Policy #11 - Policy on Ex-officio Members

New - IMLC Policy #12 - Policy on Procurement

Amended - IMLC Rule Chapter 6, amended paragraph 6.5

Amended - IMLC Rule Chapter 6, new paragraph 6.6

#11 – POLICY ON EX-OFFICIO MEMBERS

ADOPTED: March 7, 2023

EFFECTIVE: March 7, 2023

AMENDMENT HISTORY (LIST WHEN AMENDED AND CITE SECTION NUMBER):

None

I. POLICY STATEMENT

The Interstate Medical Licensure Compact (IMLC) Bylaws, Article VII creates ex-officio members who are officers of the IMLC. The ex-officio membership is created so that the officers are noted as members of each of the IMLC’s established committees. This policy is established to define the role to be played by those ex-officio members.

II. PURPOSE

The purpose of this policy is to:

- Encourage participation of the ex-officio members in the ongoing activities as demonstrated through regular attendance at the meetings of the established committees.
- Ensure that the ex-officio members are entitled to attend and participate in the established committees.
- Prevent the ex-officio members from making motions or voting on matters before the established committee.

III. GENERAL PROVISIONS

It is the policy of the IMLC that all ex-officio members, as established by IMLC Statute and Bylaw, are considered active, non-voting members.

IV. RESPONSIBILITY

The executive committee shall be responsible for administering this policy and ensuring that this policy is current, compliant with all statutory requirements and case law, and consistent with other applicable standards. The executive committee may delegate administration and maintenance of this policy to the executive director.

#12 – POLICY ON PROCUREMENT

ADOPTED: March 7, 2023

EFFECTIVE: March 7, 2023

AMENDMENT HISTORY (LIST WHEN AMENDED AND CITE SECTION NUMBER):

None

I. POLICY STATEMENT

This policy is established to define the process by which the goods and services necessary for the ongoing activities of the Interstate Medical Licensure Compact Commission (IMLCC) are obtained.

- IMLC Statute, Section 12, paragraph (f) authorizes the IMLC to “Pay, or provide for payment of the expenses related to the establishment, organization, and ongoing activities of the Interstate Commission.”
- IMLC Statute, Section 12, paragraph (o) requires that a budget be established from which expenditures are made.
- IMLC Bylaws, Article IV, Section 2, establishes the duties of the executive director, to include the monitoring of expenditures and budgets, and to execute contracts.

This policy supersedes and replaces IMLCC – Administrative Memo No. 4 in its entirety.

RULES, BYLAWS, AND POLICY CHANGE SUMMARY

II. PURPOSE

The purpose of this policy is to establish a process by which goods and services are obtained and to outline the administrative procedures to be followed in securing those goods and services.

III. GENERAL PROVISIONS

It is the policy of the IMLC that the procurement of goods and services by the IMLC shall follow the following process:

- \$1.00 to \$50,000– The one-time, or aggregate annual amount, procurement of goods or services in this range may be made at the discretion of the executive director without an RFP or contract, provided such funds are available in the budget. The expense will be recorded, receipts maintained, and reported regularly to the Treasurer and the Budget Committee.
- \$50,000 to \$100,000 – The one-time, or aggregate annual amount, procurement of goods and services in this range, shall require a cost analysis which will serve as documentation of the vendor selection. The cost analysis shall list:
 - 1) The names of the contractor(s) or vendor(s) considered;
 - 2) A description of the goods or services to be provided;
 - 3) The cost of the goods or services;
 - 4) The reason for the purchase;
 - 5) The budget category to which the purchase will be charged;
 - 6) The term of the purchase agreement;
 - 7) Other key provisions of the purchase agreement, including performance standards, if applicable;
 - 8) The delivery dates, if applicable;
 - 9) List the executive director as the authorized representative of the IMLCC; and
 - 10) Other information unique to the specific purchase agreement.
- \$100,000 or greater – The one time or aggregate annual amount in this range shall require a written Request for Proposal (RFP). The Executive Committee, as provided in IMLC Statute, Section 11, paragraph (k), shall act on behalf of the Interstate Medical Licensure Compact Commission in all matters related to the RFP process. The RFP process shall include the following requirements:
 - 1) The minimum requirements for the goods and/or services to be provided shall be established in written form by the executive director, and approved by the Executive Committee, prior to the publication of the RFP.
 - 2) Engage IMLC’s legal counsel at every juncture of the process where there is a potential for uncertainty or liability, prior to decisions to move forward to next steps, or when the Executive Committee and/or executive director believe such consultation to be necessary and appropriate.
 - 3) The minimum requirements for such goods and/or services shall include, at a minimum:
 - A description of the goods and/or services to be provided,
 - The estimated cost to be budgeted for obtaining the goods and/or services,
 - The reason for the purchase,
 - The budget category to which the purchase will be charged,
 - The estimated term of the purchase agreement to be entered into with the prevailing vendor, including any applicable scope of work/deliverables and performance standards,
 - Other information which is unique to the specific purchase agreement.
 - 4) Prior to implementation, the following action steps are to be outlined and provided to the Executive Committee for its approval:
 - The RFP development phase,
 - The process and timeline for both publication and solicitation of bids,
 - The deadline for submission of bids,
 - The evaluation process, including goals and metrics, and
 - The anticipated process, including scoring criteria, for selection of the winning bid.
 - 5) The Executive Committee shall be responsible for the oversight of the RFP process. Matters related to the RFP process may be considered in a meeting closed to the public as permitted by IMLC Statute, Section 11, paragraph (h)(3) and certified by legal counsel.

- 6) The executive director, shall establish an evaluation process, subject to approval by the Executive Committee, including scoring criteria, methods for the evaluation of the submitted bids, and vendor track records. An RFP for technology services may include a separate evaluation process performed by IMLC IT staff, the results of which will be given special consideration by the Executive Committee when determining the successful vendor.
- 7) The Executive Committee shall determine the successful vendor. The executive director shall negotiate the terms of the contract with the successful vendor, including a Statement of Work, subject to approval by the Executive Committee.
 - IMLCC’s legal counsel shall be a part of the Executive Committee’s discussions and deliberations, including drafting the contract by and between the IMLCC and the selected vendor.
 - The executive director shall be part of the Executive Committee’s discussions and deliberations, as an ex-officio member, unless a documented conflict of interest precludes such involvement, in which case, a member of the IMLCC staff shall be requested to fill this role.
 - The Executive Committee will make its determination after consultation with the executive director and consideration of the executive director’s recommendations and advice.
- 8) The executive director shall be authorized to execute the contract with the vendor, including any other documents necessary and proper to procure the goods and/or services.

IV. RESPONSIBILITY

The Executive Committee shall be responsible for administering this policy and ensuring that this policy is current, and compliant with all applicable standards and legal requirements. The administration and maintenance of this policy shall be the responsibility of the Executive Committee which is also authorized to act through the executive director.

RULE ON COORDINATED INFORMATION SYSTEM, JOINT INVESTIGATIONS AND DISCIPLINARY ACTIONS

ADOPTED: November 16, 2018

AMENDED: November 8, 2022

EFFECTIVE: November 16, 2018; As amended November 8, 2022

REVIEWED:

AMENDMENT HISTORY (LIST WHEN AMENDED AND CITE SECTION NUMBER):

- 1. Section 6.5, paragraphs (a), (b)(1), (g) and (h), amended to reflect statutory requirements – November 8, 2022**
- 2. Section 6.6, was added – November 8, 2022**

Chapter 6 – Coordinated Information System, Joint Investigations and Disciplinary Actions

6.1 Authority

This chapter is promulgated by the Interstate Commission pursuant to the Interstate Medical Licensure Compact Sections 8, 9, 10 and 15. The rule shall become effective upon adoption by the Interstate Commission.

6.2 Definitions

In addition to the definitions set forth in the Interstate Medical Licensure Compact, as used in these rules, the following definitions apply:

“Applicant” means a physician who seeks expedited licensure through the Interstate Medical Licensure Compact. See Rule 5.2(g).

“Confidential and filed under seal” means all information and documents shared shall be sent in an envelope or sent through an encrypted service and may not be discoverable in civil litigation, re-disclosed voluntarily or pursuant to a Freedom of Information Act or Public Information Act, produced pursuant to civil or criminal subpoena, except that such information may be used for the purpose of investigating and taking disciplinary action and may be disclosed as part of any public disciplinary action resulting from the investigation.

RULES, BYLAWS, AND POLICY CHANGE SUMMARY

“Compact physician” means a physician who has obtained a license through the Compact.

“Coordinated information system” means the database established and maintained by the Interstate Commission as set forth in the Compact. See Rule 2.2.

“Disciplining Board” means a member Board that imposes discipline upon a Compact physician.

“Investigative, litigation or compliance materials” means licensure records, disciplinary records, litigation records, application records, and compliance records for a Compact physician, but does not mean criminal history record information in accordance with Rule 2.6.

“Joint investigation” means an investigation involving multiple member Boards.

“Lead investigative Board” means a member Board chosen to coordinate a joint investigation.

“Medical Practice Act” means a member state’s practice act governing the practice of medicine.

“Member Board” means a state that has enacted the Compact. See Rule 5.2(bb).

“Necessary and proper disciplinary and investigatory information” means:

- 1) The type of action:
 - a) complaint;
 - b) charge;
 - c) non-final public action;
 - d) final public action; or
 - e) non-public action;
- 2) Date action was taken;
- 3) Whether the action results in the removal of the physician’s Compact license, such as a suspension, revocation, surrender or relinquishment in lieu of discipline;
- 4) Whether the action is to initiate a joint investigation;
- 5) Name of Board, Agency, or Entity that took the action specified in this report; and
- 6) Current Status and changes in status of any action:
 - a) investigation continuing;
 - b) charges issued, but no final action taken;
 - c) final action issued pending appeal;
 - d) final action with all judicial remedies exhausted;
 - e) closed without resulting discipline.

“Nonpublic complaint” means allegations that a physician violated a state’s Medical Practice Act that have not been made public.

“Nonpublic complaint resolution” means a non-disciplinary board action, advisory letter, letter of education, letter of concern, nonpublic disposition agreement, nonpublic consent order, corrective action agreement, or any other type of nonpublic actions taken by a member Board.

“Public action” means disciplinary actions, disciplinary fines, reprimands, probations, conditions or restrictions on a licensee, suspensions, summary suspensions, cease and desist orders, revocations, denials of licensure, or any other type of action taken by a member Board that is public.

“Public complaint” means a public charging document or allegations that a physician violated a state’s Medical Practice Act that have been made public by a member Board.

“Share information” means that a member Board shall disclose the relevant information to the Interstate Commission or other member Board.

“State of principal license” means a member state where a physician holds a license to practice medicine and which has been designated as such by the physician for purposes of registration and participation in the Compact. See Rule 5.2(gg).

6.3 Coordinated Information System

- a) The Interstate Commission shall establish a database of all applicants and Compact physicians. The database will contain the core data set and necessary and proper disciplinary or investigatory information. The database will be available for all member Boards to report and query information, as appropriate.
- b) Each member Board shall report the name, NPI number, and all necessary and proper disciplinary or investigatory information of a public complaint or public action on a form provided by the Interstate Commission to the Interstate Commission as soon as reasonably possible, but no later than 10 business days after a public complaint or public action against an applicant or Compact physician has been entered. The member Board shall attach a copy of the public complaint or public action.
- c) Each member Board shall submit an updated report to the Interstate Commission upon changes to the status of any reported action.
- d) When the Commission receives notice of a final public action by a member Board, the Commission shall notify the member Boards for all other member states where the disciplined Compact physician is licensed.
- e) Each member Board may disclose any nonpublic complaint or nonpublic complaint resolution to the Interstate Commission.
- f) On request of another member Board, each member Board shall share the requested information from an investigative file as soon as reasonably possible, and that information shall be confidential and filed under seal.
- g) All information provided to the Coordinated Information System and documents obtained or shared through Compact Sections 8 or 9 or Rule 6.3(e) are confidential and filed under seal and may only be used by member Boards for investigations or during disciplinary processes and may be made public in disciplinary actions but may not be redisclosed to any person or non-member Board.

6.4 Joint Investigations

- a) A member Board may participate with other member Boards in joint investigations of a Compact physician or applicant.
- b) Upon initiating a joint investigation, the lead investigative Board shall notify the Interstate Commission of the joint investigation and inform the Interstate Commission which member Boards are part of the joint investigation. The Interstate Commission shall notify any other member Boards where the Compact physician is licensed of the identity of the individual under investigation and the contact information for the lead investigative Board.
- c) In a joint investigation, the lead investigative Board may be the member Board in the member state where the alleged conduct occurred, the state that initiated the joint investigation, or any member Board chosen by the participating member Boards to be the lead investigative Board.

RULES, BYLAWS, AND POLICY CHANGE SUMMARY

- d) The lead investigative Board shall direct the investigation and update the participating member Boards upon any significant developments in the investigation.
- e) The lead investigative Board may request the other member Boards participating in the joint investigation to conduct investigatory tasks in their own states.
- f) A non-lead investigative Board may continue its own investigation but shall keep the lead investigative Board apprised of its investigatory actions and shall coordinate its actions with the lead investigative Board.
- g) A subpoena issued by a member Board shall be enforceable in other member states, whether or not the subpoena concerns a Compact physician or applicant.
- h) Should an individual or entity refuse to comply with the enforceable subpoena, the member Board that issued the subpoena may request the local member Board to issue a subpoena on the investigating member Board's behalf. The local member Board shall issue such a subpoena and shall share the resulting information with the investigating member Board.
- i) All member Boards participating in a joint investigation shall share investigative information, litigation, or compliance materials upon request of any member Board where the Compact physician under investigation is licensed.
- j) Any member Board may investigate actual or alleged violations of a statute authorizing the practice of medicine in any other member state in which a physician holds a license to practice medicine. The investigating member Board shall contact the other member Board and inform them about the investigation prior to initiating the investigation in that state. Upon conclusion of the investigation, the investigating member Board shall inform the other member Board about the results of the investigation.
- k) The final outcome or disposition of any joint investigation shall be reported to the Interstate Commission by the lead investigative Board.

6.5 Disciplinary Actions

- a) Any disciplinary action by a disciplining Board shall be considered unprofessional conduct and may be a basis for discipline by other member Boards. This includes any action that does not have a corresponding ground by the other member Board's Medical Practice Act or in addition to any other specific violation of the Medical Practice Act in the other member state.
- b) Any member Board, including the state of principal license, may:
 - 1) Administratively take reciprocal action against a compact physician who was disciplined by a disciplining Board. The administrative reciprocal action of the disciplinary Board is deemed conclusive as to matters of law and fact, and a member Board may impose the same or lesser sanction that is consistent with the Medical Practice Act of that state;
 - 2) Pursue disciplinary action in accordance with the member Board's Medical Practice Act against a Compact physician who was disciplined by a disciplining Board. The action of the disciplinary Board is deemed conclusive as to matters of law and fact and a member Board may impose a more severe sanction; or
 - 3) Take no action.
- c) If a license issued by a member state through the Compact is revoked, surrendered, suspended or relinquished in lieu of discipline, then the member Board shall notify the Interstate Commission as soon as reasonably possible, but no later than 5 business days from the date of the action and shall send a copy of the action to the Interstate Commission.

- d) The Interstate Commission shall immediately notify all other member Boards that have licensed the physician and shall send a copy of the action to the other member Boards.
- e) Upon receipt of notice from the Interstate Commission of an action taken by the state of principal license, the other member Boards shall immediately place the Compact physician on the same status as the state of principal license.
- f) If the state of principal license reinstates the disciplined Compact physician's license, it shall notify the Interstate Commission that the suspension has been terminated as soon as reasonably possible, but no later than 5 business days after the suspension has ended. The Interstate Commission shall immediately notify the other member Boards. Those member Boards shall reinstate the license in accordance with the Medical Practice Act of that state.
- g) Upon receipt of notice from the Interstate Commission that a license granted to a physician by a non-state of principal license member state is revoked, surrendered, suspended or relinquished in lieu of discipline, then any license(s) issued by any member board(s) shall be automatically and immediately suspended by the other member board(s) for 90 calendar days on entry of the order of the disciplining Board to permit the member Board to investigate under the Medical Practice Act of that state.
- h) Within 90 calendar days of the suspension, as established in paragraph (g) above, one of the following may occur:
 - 1) a state of principal license may terminate the suspension of the license;
 - 2) a non-state of principal license may terminate the suspension if the state of principal license has already terminated the suspension;
 - 3) any member Board may impose reciprocal discipline or pursue reciprocal discipline pursuant to Rule 6.5(b) or (c); or
 - 4) any member Board may continue the suspension until the member Board that initially took the action has taken a final action.

6.6 State Authority regarding Disciplinary Actions

A member board authorized or required to impose an automatic licensing action against a Compact physician, under IMLC Statute, Section 10(b) and (d), may immediately terminate, reverse, or rescind such automatic action pursuant to the Medical Practice Act of that state.

The mission of the Compact is to increase access to health care — particularly for patients in underserved or rural areas.



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