



Telehealth Licensure: Emerging State Models of Physician
Licensure Flexibility for Telehealth

September 19th, 2023

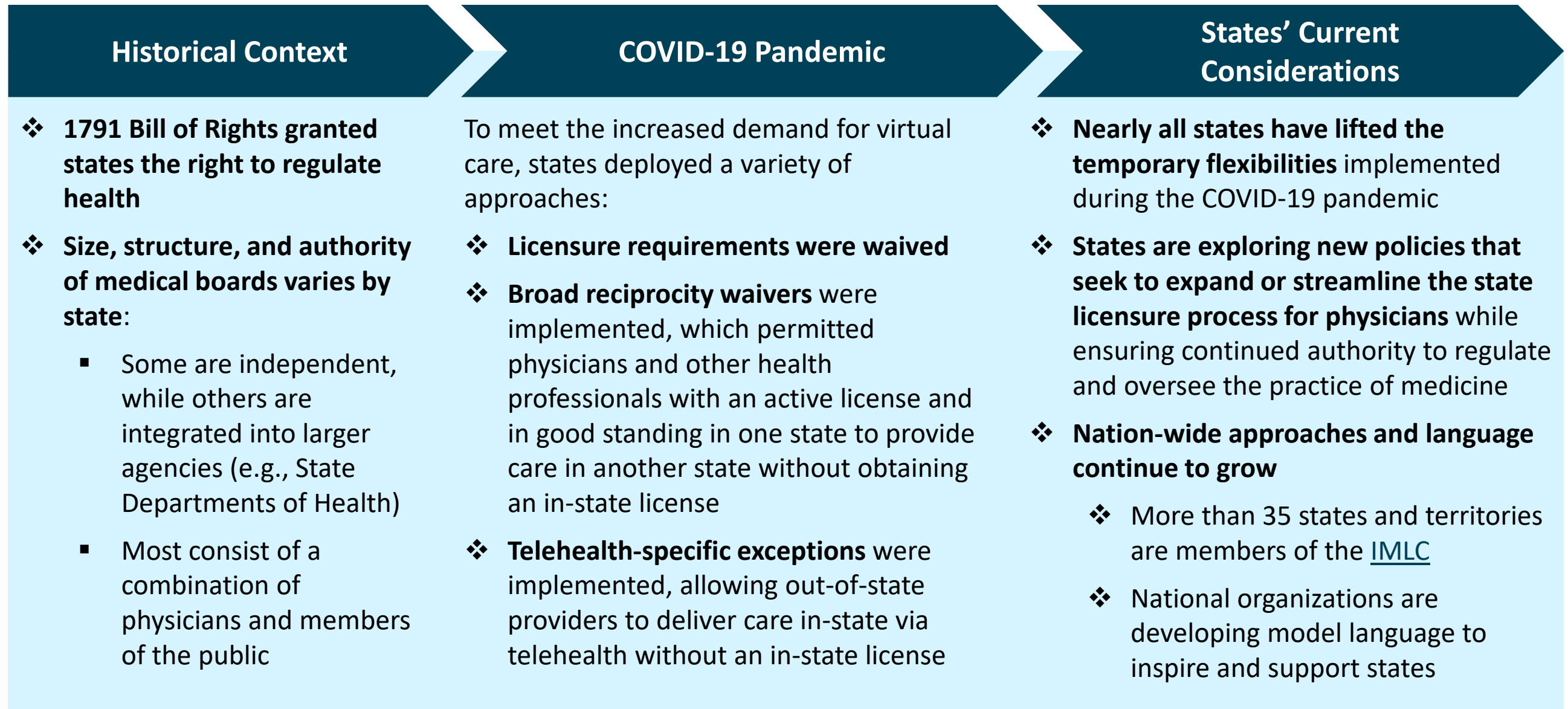
- **Welcome**

- **Overview: Telehealth Licensure**

- **Deep Dive: State Approaches**

- **Panel Discussion**

- *Sarvam TerKonda, MD, Federation of State Medical Boards (FSMB)*
- *Marschall Smith, Interstate Medical Licensure Compact (IMLC)*
- *Clark Barrineau, Medical Society of Virginia*



Licensure for cross-state and telehealth services



Interstate compacts

Creates an expedited licensure pathways for physicians to deliver either in-person or telehealth services in more than one state



Licensure by endorsement or reciprocity

Provides an expedited pathway for physicians to obtain a full license in the endorsing state or state with reciprocity agreement based on a set of qualifying criteria



Special purpose telehealth registries or licenses

Allows physicians who are licensed in other states to register or obtain a special license to deliver telehealth services to in-state residents

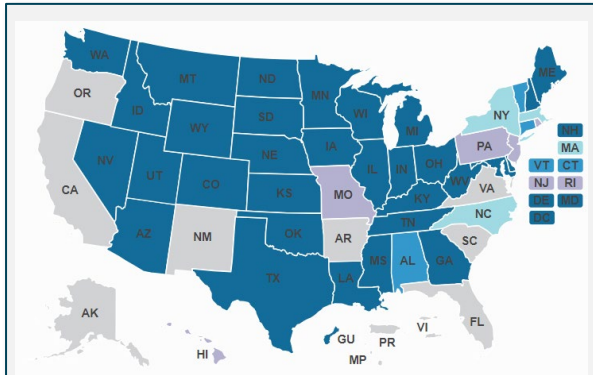


Exceptions to in-state licensure requirements

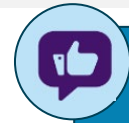
Allows physicians who are licensed in other states to deliver services via telehealth (and in some cases in-person) to patients without an in-state license, under certain circumstances



Interstate Compacts



>35 states and territories are members of the IMLC



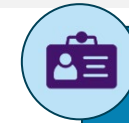
Licensure by Endorsement or Reciprocity



Virginia

Four key criteria are required for licensure by endorsement: (1) **hold a current licensure** in USA or Canada for the 5 years immediately preceding application; (2) **engaged in active practice** during that time; (3) verify all current licenses are in **good standing**; (4) hold a **certificate from one of a number of medical societies** (e.g., American Board of Medical Specialists).

VA also allows licensure by reciprocity for those licensed in Maryland or the District of Columbia.



Special Purpose Telehealth Registry or License



Florida

Offers out-of-state registration for physicians and other health professionals licensed outside of Florida. Registrants cannot have an in-state physical address or provide in-person services in-state and must maintain liability coverage for telehealth services provided in-state.



Exceptions to In-State Licensure Requirements



Arizona

A healthcare provider who is not licensed in AZ is eligible to provide telehealth services in the following circumstances:

- In response to an emergency
- In consultation with an AZ-based provider
- To provide after-care specifically related to a medical procedure that was delivered in-state
- To a person who is a resident of another state and the telehealth provider is the primary care provider or behavioral health provider located in AZ

■ AMA Policy

- **Support state-based licensure.** Physicians and other health care professionals must be licensed in the state where the patient is receiving care or as otherwise authorized by state law.
- Physicians and other health care professionals must **abide by state licensure laws** and the medical practice act in the state where the patient is located.
- **Support the Interstate Medical Licensure Compact.**
- **Support exemptions** to licensure for limited circumstances.
- Encourage states to facilitate **interstate telehealth for continuity of care** and to **preserve critical relationships** between patients and their regular physician.

■ AMA model state legislation