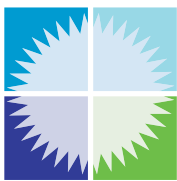


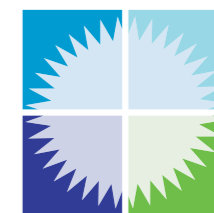
FY2022
ANNUAL REPORT



**Interstate
Medical Licensure
Compact**

Submitted by the Interstate Medical Licensure Compact Commission

Michael Rodman, Communications Committee Chair
Marshall Smith, Executive Director



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Two important terms used through-out 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 2021 - JUNE 2022

The IMLCC's process, which was engaged in April 2017, has been used by more than 13,000 physicians who were able to secure more than 39,000 licenses in IMLCC member jurisdictions through June 30, 2022. There are 37 states, the District of Columbia and the U.S. Territory of Guam, who are members of the IMLCC – a map of the member states can be found at www.imlcc.org. To use the expedited licensure process, a physician must meet nine requirements and hold an active, unrestricted license in a member state where they live or are employed.

The COVID Pandemic continues to impact the need for an expedited process for physicians to obtain licenses. It has highlighted the critical role played by the Compact and our member board's staff in providing states with a safe, effective pathway to meeting that need. The expansion of telemedicine has played a critical role in providing that coverage and

the Compact has played a part in this expansion, and it remains one of the key reasons physicians use the Compact process. Other reasons include regional licensure, locum tenens, and hospital systems providing post-treatment and inter-treatment care options.

The first 5 years of the IMLC have been marked by incredible growth and expansion. Our focus has been and remains providing a true option to physicians in obtaining licensure in multiple states through a single, on-line application. The next 5 years will present even more opportunities to serve and succeed.

Additional information regarding applications received and licenses issued, including month by month, physician demographical information, and numbers by member board will be posted on the IMLCC's website at <https://www.imlcc.org/news/press-releases-and-publications/>

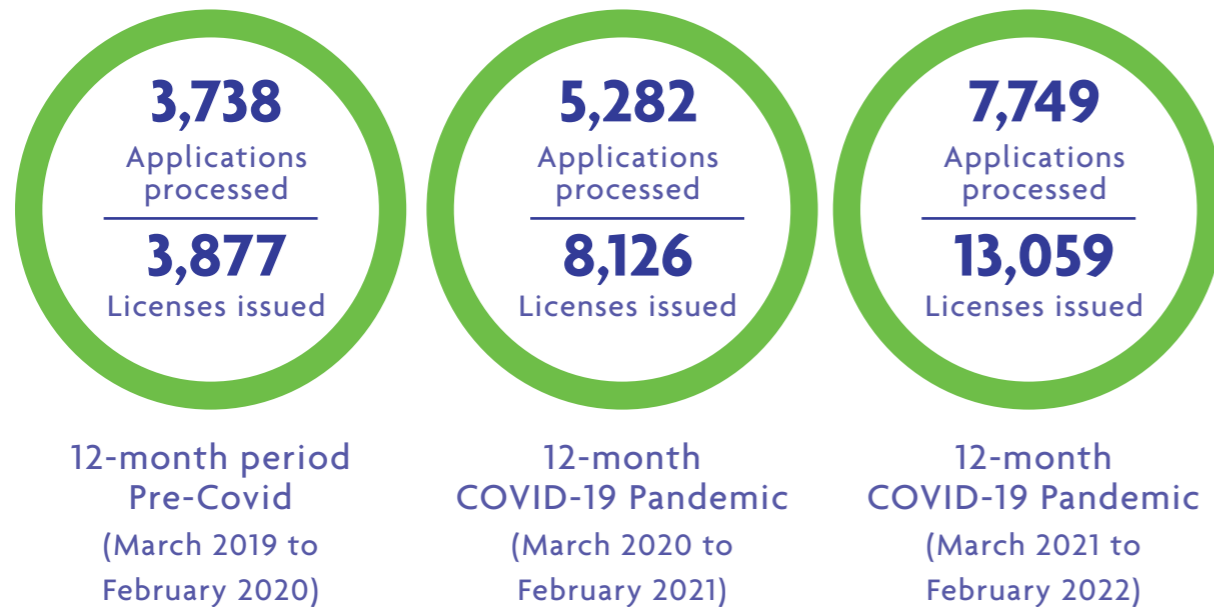
PROCESSING VOLUME FOR FY2022

10,832
Applications
Processed
(5,650 in FY2021)

17,973
Licenses
Issued
(10,198 in FY2021)

12,499
Licenses
Renewed
(8,756 in FY2021)

COVID-19 PANDEMIC PROCESSING INFORMATION



BUDGET REPORT

The IMLCC FY2023 budget was approved by the Executive Committee at its May 17, 2022 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 FY2023. 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 utilization of the Compact process by physicians over the past 5 years has been phenomenal and demonstrated a need in the licensing process. The Compact works closely with our member boards to bring a value-added process to the essential work that they perform in the evaluation of physician qualifications and enforcement of their medical practice act. The use of a high-bar standard enables Compact eligible physicians to quickly and efficiently obtain licenses – a process that proved critical during the height of the COVID-19 pandemic, as demonstrated in the chart below. The Compact staff are committed to making the next 5 years as productive and exciting as these initial 5 years.

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

STATES JOINING THE IMLC

- Connecticut
- Delaware
- Indiana
- New Jersey
- Ohio
- Rhode Island

2021 ANNUAL MEETING

The IMLCC held its sixth annual meeting, both in-person and virtually in Denver, Colorado on November 16, 2021. The meeting included a rulemaking hearing, that amended IMLC Rules Chapter 2 and Chapter 7. The changes to Chapter 7 were a complete revision of the process for handling disputes between member states. 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 2022 annual meeting will be held in Gulf Shores, Alabama on November 8, 2022.

OTHER IMLCC MEETINGS

The Commissioners met on May 17, 2022 to approve the FY2023 budget. Minutes from the meetings 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 2 – Rule on Information Practices – amended paragraph 2.6 to clarify Federal criminal records check information and added subparagraph 2.6(2) – November 2021
- IMLC Rule – Chapter 7 – Rule on Compliance and Enforcement – replaced paragraph 7.2 in its entirety with all sub-paragraphs altered to more accurately reflect the process for the resolution of disputes between member states – November 2021

Bylaws adopted or amended:

- None

Policies adopted:

- None

Policies amended:

- IMLC – Policy #9 – Policy on Investment Strategies – amended paragraphs II, VI, VII, VIII, IX, X and XI to reflect a revised investment process

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 Alabama State Medical Licensure Commission
- Arizona Board of Osteopathic Examiners in Medicine and Surgery
- Arkansas State Medical Board
- Connecticut Medical Examining Board
- Delaware Board of Medical Licensure and Discipline
- District of Columbia Board of Medicine
- Georgia Composite Medical Board
- Indiana (State of) Medical Licensing Board
- Louisiana State Board of Medical Examiners
- Missouri Board of Registration for the Healing Arts
- Michigan Board of Medicine, Licensing and Regulatory Affairs
- Nebraska Department of Health and Human Services, Board of Medicine and Surgery
- New Jersey Medical Board
- New Mexico Medical Board

- North Carolina Medical Board
- Ohio, State Medical Board of
- Texas Medical Board
- Virginia Board of Medicine
- Washington State Board of Osteopathic Physician and Surgeon
- West Virginia Board of Medicine

The IMLCC staff participated in the following outreach and educational activities during FY2022:

- Monthly Licensing Staff Discussions – held the 3rd Wednesday of each month
- Interstate Healthcare Collaborative conference call – held the 3rd Friday of each month
- IMLCC 3rd Party Organizations Conference Call – every other month
- Compact Administrators conference call – quarterly meeting, started in February 2022
- Pennsylvania Leadership meeting on FBI Background Issues – July 2021
- FSMB Live Web Event – July 2021
- Louisiana Society of Medical Staff Services webinar – July 2021
- Administrators In Medicine – Joint Training – August 2021
- Rural Telehealth Evaluation Center (RTEC) – HRSA funded study meeting – August 2021
- Counsel of State Governments – Webinar on COVID-19 – August 2021
- Community Care Network of Kansas: Kansas IMLCC – Webinar – September 2021
- National Organization of Rare Disorders – discussion – September 2021
- Alaska State Hospital & Nursing Home Association – discussion – November 2021
- National Counsel of State Legislatures – Legislative Summit – November 2021
- IBM Watson – CSV project – discussion – December 2021
- Counsel of State Governments – Webinar on Compacts in Action – December 2021
- Teledoc – discussion – February 2022
- Connecticut Public Health Committee hearing – testimony – March 2022
- Missouri House and Senate hearings – testimony – March 2022
- Index Health – discussion – April 2022
- National Board of Physicians and Surgeons – discussion – April 2022
- Massachusetts Joint Committee on Health Care Financing – testimony – April 2022
- Rhode Island House Hearing – testimony – April 2022
- Federation of State Medical Boards – annual meeting – April 2022
- Purview Medical – webinar – May 2022
- Rhode Island Senate Hearing – testimony – May 2022
- National Counsel of State Legislatures – National Occupational Licensing Meeting – June 2022

The IMLC has prepared a series of short (5 to 7 minute) tutorials demonstrating the process to assist the physician in completing an IMLC application. The tutorial videos can be found at:

<https://www.imlcc.org/videos/>

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

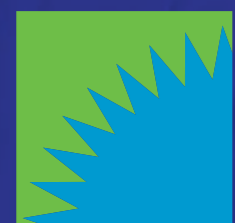
The IMLCC FY2021 audit reports were approved by the Budget Committee on behalf of the IMLCC at the committee's March 15, 2022 meeting.

A copy of all the final documents for the FY2021 audit can be found at <https://www.imlcc.org/news/press-releases-and-publications/> then clicking on the "Audit Documents" tab.

The documents available include:

- **FY2021 Audit - Final Governance Communication**
- **FY2021 Audit - Final Internal Control Communication**
- **FY2021 Audit - Final Financial Statements**

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.



FY 2021 AUDIT REPORTS

INTERSTATE MEDICAL LICENSURE COMPACT COMMISSION November 16, 2021

MEETING MINUTES

Call to Order | *Chair Cushman (NE)*

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

Roll Call | *Secretary Smith*

The roll was called, and a quorum was established.

Approval of the agenda | *Chair Cushman (NE)*

An amended agenda for the meeting was presented by Chair Cushman (NE).

- MOTION
- MOVED BY COMMISSIONER MARX (UT), SECONDED BY COMMISSIONER SPANGLER (WV), TO APPROVE THE AGENDA AS AMENDED.
- MOTION PASSED
- UNANIMOUS

Approval of the minutes | *Secretary Smith*

The minutes from the November 17, 2020 and the May 18, 2021 meetings were provided to the members prior to the meeting for their consideration.

- MOTION #1
- MOVED BY COMMISSIONER GROSS (GA), SECONDED BY COMMISSIONER COUSINEAU (NV), TO APPROVE THE IMLCC COMMISSIONER MEETING MINUTES FROM NOVEMBER, 2020.
- MOTION PASSED
- WITH 35 YES VOTES, 0 NO VOTES, AND 3 ABSTENTIONS
- MOTION
- MOVED BY COMMISSIONER MARTINEZ (MN), SECONDED BY COMMISSIONER WASSERMAN (WI), TO APPROVE THE IMLCC COMMISSIONER MEETING MINUTES FROM MAY 18, 2021.
- MOTION PASSED
- WITH 36 YES VOTES, 0 NO VOTES, AND 3 ABSTENTIONS

Keynote Speaker | *Dr. Sneha Thamocharan*

Dr. Thamocharan is an Assistant Professor and pediatric clinical psychologist in the Department of Psychology at the University of Colorado Denver. The keynote address as a presentation and discussion regarding diversity and bias that exist in the medical field and deliver of care, along with solutions and approaches to address and minimize.

Chair's Report | *Chair Cushman (NE)*

The chair provided comments to the commissioners, highlighting the changing role of the commissioners and the importance of communication and being actively engaged. The



2021 ANNUAL MEETING MINUTES

Compact is changing and growing, with transitions to new operating systems, adding staff and expanding hours of customer service.

Change is important for the organization as we continue to grow; each member board brings a unique perspective that continues to move the Compact as a whole forward.

Executive Director’s Report | Executive Director Smith

The executive director provided an update on the 3 major operational areas: Operations, Fiscal and Technology.

Operations Group, headed by Dave Clark:

- Implemented a new phone system
- Created a tracking process for issues reported by customer service via phone calls and emails.
- Finding ways to partner with member board staff to solve problems
- Developed an “On-boarding and Training” process for new boards to understand the system and processes

Fiscal Group, headed by Todd Mata

- Developed a fiscal model for revenue modeling and fee analysis
- Completed or will be completing 3 fiscal audits covering FY 2019, 2020 and 2021 in a single year
- Develop internal controls and written procedures to create accountability
- Kicked off the investment of funds to start the Compact on a self-endowment pathway

Technology Group, headed by Dale Watts

- Finalized a comprehensive data mapping project
- Created and implemented system and vendor controls
- Moved from a vendor heavy maintenance and development process to a staff directed process and controls

The overall picture of the Compact management from outside experts; auditors, system expert reviewers, and ongoing independent testing, show an IT system and management actions that are positive, indicative of good management processes and demonstrate sound decision making and appropriate risk analysis.

The Compacts 46 member boards in the previous 12 months:

- Processed nearly 17,000 applications
- Issued nearly 26,000 licenses
- Earned more than \$3.6 million dollars in fees
- Handled over 11,000 financial transactions

Report from 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 SILAS (AL), SECONDED BY COMMISSIONER HUNTHAUSEN

(MT), 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
UNANIMOUS

Meeting closed to the public

The meeting was closed from 10:55 am to 11:03 am Mountain Time. 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.

Rulemaking Hearing | Commissioner Martinez (MN)

At 11:10 am Mountain 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 2 and Chapter 7 along with proposed amendments to IMLC – Policy 9 were provided prior to the meeting. The change to IMLC Rule Chapter 2 was to provide clarification regarding paragraph 2.6. The changes to IMLC Rule Chapter 7 were a complete revision of the rule. The changes to IMLC Policy 9 were to provide clarification regarding the investment strategy and constraints regarding investment opportunities.

The proposed amendments were considered separately and a discussion was held prior to each motion.

- MOTION
- MOVED BY THE RULES AND ADMINISTRATIVE PROCEDURES COMMITTEE, A MOTION BY A COMMITTEE DOES NOT REQUIRE A SECOND, TO AMEND IMLC RULE CHAPTER 2 – RULE ON INFORMATION PRACTICES.
- MOTION PASSED
- UNANIMOUS
- MOTION #2
- MOVED BY THE RULES AND ADMINISTRATIVE PROCEDURES COMMITTEE, A MOTION BY A COMMITTEE DOES NOT REQUIRE A SECOND, TO AMEND IMLC RULE CHAPTER 7 – RULE ON COMPLIANCE AND ENFORCEMENT.
- MOTION PASSED
- UNANIMOUS
- MOTION #3
- MOVED BY THE RULES AND ADMINISTRATIVE PROCEDURES COMMITTEE, A MOTION BY A COMMITTEE DOES NOT REQUIRE A SECOND, TO AMEND IMLC POLICY #9 – POLICY ON INVESTMENT STRATEGIES.
- MOTION PASSED
- WITH TWO COMMISSIONERS ABSTAINING

The rulemaking hearing was concluded at 11:23 am Mountain Time.

Working Lunch Discussion | Controller Todd Mata

A presentation on the IMLC internal controls and budget reporting was provided by Todd Mata, Controller. Members were provided examples of the fiscal reporting reviewed by the Budget Committee monthly and walked through the process of reading the financial statements.

Election of officers | Executive Director 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 Cousineau (NV) nominated Commissioner Mark Spangler (WV) to the position of IMLCC Chair. The nomination was seconded by Commissioner Farrelly (MD). The nomination was accepted and discussion held. No other nominations were put forward.

- MOTION
- BY ACCLAMATION THE NOMINATIONS WERE CLOSED AND COMMISSIONER SPANGLER (WV) WAS ELECTED TO THE POSITION OF CHAIR.

VICE CHAIR

Commissioner Cousineau (NV) nominated Commissioner Christine Farrelly (MD) to the position of IMLCC Vice Chair. The nomination was seconded by Commissioner Hansen (SD). The nomination was accepted and discussion held. No other nominations were put forward.

- MOTION
- BY ACCLAMATION THE NOMINATIONS WERE CLOSED AND COMMISSIONER FARRELLY (MD) WAS RE-ELECTED TO THE POSITION OF VICE CHAIR.

TREASURER

Commissioner Farrelly (MD) nominated Commissioner Karen Silas (AL). The nomination was seconded by Commissioner Martinez (MN). The nomination was accepted and discussion held. No other nominations were put forward.

- MOTION
- BY ACCLAMATION THE NOMINATIONS WERE CLOSED AND COMMISSIONER SILAS (AL) WAS ELECTED TO THE POSITION OF TREASURER.

Action Item #1 – Request to expend Reserve Funds | Executive Director Smith

The action item included 3 separate motions regarding the expenditure of reserve fund for the purpose of developing and implementing the next phase of system development. After the motions were introduced by the Executive Director and prior to the discuss of the motions by the Commissioners, a procedural motion was made to suspend discussion and postpone consideration of the matter until a later date. Such a procedural motion is permitted and must be acted on prior to the continuation of the discussion.

The concerns about the project were provided as the background behind the request to postpone consideration until additional information could be gathered. During the discussion, it was suggested that an Ad Hoc Committee be formed to review the matter and provide recommendations at the next Commission meeting.

After discussion, the question was called.

- MOTION
- MOVED BY COMMISSIONER FARRELLY(MD), AND SECONDED BY COMMISSIONER MARTINEZ (MN), TO SUSPEND DISCUSSION UNTIL THE MAY 2022 COMMISSION MEETING AND TO FORM AN AD HOC COMMITTEE TO STUDY THE MATTER AND PROVIDE RECOMMENDATIONS.
- MOTION PASSED
- WITH 6 COMMISSIONERS OPPOSED TO THE MOTION

Discussion Topic #1 | Commissioner Reed (NV)

Commissioner Reed led a discussion regarding creating criteria for the approval/refusal to accept Letters of Qualification by member boards. After discussion, no action was taken; however, commissioners were reminded that IMLC Rule Chapter 7 outlines the process for member boards to raise and resolve disputes. All commissioners were encouraged to review the rule.

Discussion Topic #2 | Commissioner Douglas Smith (MD)

Commissioner Douglas Smith led a discussion regarding various options available to member boards regarding the use of the IMLCC process for reinstatement of lapsed or non-renewed licenses. The discussion confirmed that member boards process these requests by physicians differently, often based on the state-specific statutes regarding the reinstatement process. Those statutes would apply whether the license was obtained through the traditional process or the IMLCC process. No action was requested or taken.

Discussion Topic #3 | Commissioner Durrett (KS)

Commissioner Durrett led a discussion regarding exploring the idea of offering Medical Malpractice insurance policies or partner with a provider to assist physicians with licenses in multiple states to find a multi-state policy. After discussion, no action was taken.

Discussion Topic #4 | Executive Director Smith

Executive Director Smith led a discussion regarding exploring partnership opportunities to change how GME and board certification from Canadian authorities are processed for consideration of a Letter of Qualification. Guests from the American Board of Medical Specialties provided information and contributed to the discussion. After discussion, the question was called and the matter was put to a vote.

- MOTION
- MOVED BY COMMISSIONER BURKHOLDER (MT), AND SECONDED BY COMMISSIONER MARTINEZ (MN), TO TABLE CONSIDERATION OF THE MATTER.
- MOTION PASSED
- WITH 1 COMMISSIONER IN OPPOSITION

Committee Reports

Budget Committee | Treasurer Farrelly (MD)

- The Audit Committee has been dissolved and members asked to join the Budget Committee. The Budget Committee will assume the duties and responsibilities previously held by the Audit Committee.
- There will again be no levy or collection of an annual assessment from member states to cover the cost of operations. The Commission has sufficient revenues to cover the cost of operations.
- The committee received detailed training from the IMLCC Controller about key budget matrices and how to review budget reports.
- A review of the service fees charged by the Commission has been conducted and determined that the current amounts charged are appropriate.
- The FY2020 Audit has been completed and published. The FY2021 audit has been started with the final reports expected in early 2022.
- Two issues the committee continues to monitor are the return of fund report and credit card processing fees.
- The Budget Committee charge was reviewed and has been updated to include the audit responsibilities.
- Other fee charges are being explored, such as a credit card transaction fee, a return of funds fee, etc.
- Administrative procedures are being drafted to cover internal controls, whistleblower procedures and documenting separation of duties among Commission staff.

Communications Committee | Commissioner Spangler (WV)

- The committee reviewed and updated the committee charge document.
- The committee's goals for 2022 include:
 - Quarterly newsletters
 - Publication and distribution of the annual report
 - Complete review of the IMLCC's webpages and content, including mobile versions
 - Holding regular monthly meetings
 - Assist the Executive Director in developing a standardized monthly Commissioner report

Personnel Committee | Commissioner Herlihy (VT)

- The committee's role has expanded with the addition of employees filling commission staff positions.
- An organization chart has been completed and approved positions documented in the chart.
- In 2022, the committee will be working on the process for evaluating the Executive Director's performance including creating a position description and evaluation form and process.
- The committee is working on revising its mission and documenting it through the committee charge document.

Rules and Administrative Procedures Committee | Commissioner Martinez (MN)

- The committee has reviewed all Rules, Policies and Administrative procedures and

results were part of this meeting's rule making hearing.

- A review of the use of the terms "IMLC" and "IMLCC" through out publications will be conducted.
- Developing a policy of reimbursement for staff travel.
- Meetings will be established monthly in 2022.

Technology Committee | Commissioner Cushman (NE)

- The committee is working on revising its committee charge document.
- Developing an action plan for documenting system plans and development.
- Action logs are being created and reviewed monthly regarding current and historical system issues and improvements.

Public Comments | Chair Cushman (NE)

None were provided.

Location of the next annual commission meeting | Chair Cushman (NE)

There were 3 member states who offered to host the next meeting; Alabama, Kentucky, and Maine. The commissioners from each state presented information about their state's offer to host the next meeting. After the presentations, Commissioners then voted, with Alabama receiving the highest number of votes.

Adjournment | Chair Cushman (NE)

There being no further business, the meeting was adjourned at approximately 5:11 pm Eastern Time.

**A faster
pathway to
medical licensure**

ROSTER OF COMMISSIONERS



ALABAMA

Commissioner Tiffany Seamon
(9/16/2021)
Personnel Committee Member

Commissioner Karen Silas (5/20/2017)
*IMLCC Treasurer
Budget Committee Chair
Executive Committee Member*



ARIZONA

Commissioner Justin Bohall (11/15/2019)
*Rules & Administrative Procedures
Committee Member*

Commissioner Patricia McSorley (6/1/2016)
Personnel Committee Member



COLORADO

Commissioner Donald Lefkowitz, MD
(9/1/2018)
Budget Committee Member

Commissioner Lorey Bratten (8/28/2019)
Technology Committee Member



CONNECTICUT

Commissioner Chris Andresen, MPH
(9/29/2022)
Committee Assignment Pending

Appointment Pending



DELAWARE

Appointment Pending

Appointment Pending



DISTRICT OF COLUMBIA

Appointment Pending

Commissioner Vikisha Fripp, MD
(10/4/2019)
*Rules and Administrative Procedures
Committee Member*



GEORGIA

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

Communications Committee Member

Commissioner Daniel Dorsey (2/21/2022)

Committee Assignment Pending



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 Warren Gall, MD (8/20/2018)

Rules & Administrative Procedures Committee Member

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)

Communications 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 (12/2/2022)

Committee Assignment Pending

Commissioner Lester Johnson MD (12/2/2022)

Committee Assignment Pending



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)

Executive 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 Ruth Martinez (10/23/2015)

Rules & Administrative Procedures Committee Chair
Executive Committee Member

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

Technology Committee Chair
Executive Committee Member



MISSISSIPPI

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

Budget Committee Member

Commissioner Anna Boone

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

Commissioner Jesse Cushman (7/6/2018)

Executive Committee Member

Maria Michaelis, MD (3/23/2021)

Communications Committee Member



NEW HAMPSHIRE

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

Technology Committee Member

Appointment Pending



NEW JERSEY

Appointment Pending

Appointment Pending



NEVADA

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

Budget Committee Member

Commissioner Sandy Reed (2/1/2017)

Personnel Committee Member



NORTH DAKOTA

Commissioner Lynette McDonald (9/12/2019)

Technology Committee Member

Commissioner Rupkumar Nagala, MD (9/12/2019)

Personnel Committee Member



OHIO

Commissioner Stephanie Loucka (10/25/2021)

Budget 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 Gabriel Gilman (10/23/2020)

Rules & Administrative Procedures Committee Member



WASHINGTON

Commissioner Melanie deLeon (5/10/2017)

Budget Committee Member

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

During FY2022, there were no new Bylaws, Rules or Policies adopted by the Commission. Two amendments were made to existing Rules and one Policy was amended.

RULE ON INFORMATION PRACTICES

ADOPTED: DECEMBER 14, 2016

EFFECTIVE: DECEMBER 14, 2016

REVIEWED: MARCH 16, 2021

AMENDED: FEBRUARY 22, 2017; JUNE 27, 2017

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

1. **Section 2.6, Federal criminal records check information was adopted by the Interstate Commission on February 22, 2017, in an emergency rule-making action pursuant to administrative rule Chapter 1.**
2. **Section 2.6, Federal criminal records check information, was adopted by the Interstate Commission on June 27, 2017, through the regular rule-making process pursuant to administrative rule Chapter 1.**
3. **Section 2.6, Federal criminal records check information, was amended by the Interstate Commission on November 16, 2021, through a regular rule-making process pursuant to IMLC Rule, Chapter 1.**

CHAPTER 2 - Information Practices

2.1 Authority

This chapter is promulgated by the Interstate Commission pursuant to the Interstate Medical Licensure Compact. This rule shall become effective upon adoption by the Interstate Commission.

2.2 Definitions

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

“Core data set” means a set of information about an applicant for a letter of qualification for expedited licensure through the Compact or a set of information about a physician who is issued an expedited license through the Compact or renews an expedited license through the Compact. The core data set shall include:

- (1) Eligibility for expedited licensure through the Compact;
- (2) Full legal name;



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- (3) Other name(s) used, previously or currently;
- (4) Gender;
- (5) Date of birth;
- (6) National Provider Identifier Number;
- (7) Social security number;
- (8) Address of record;
- (9) Telephone number of record;
- (10) E-mail address delegated by applicant to receive correspondence;
- (11) Medical degree conferred;
- (12) Medical school, including year of completion, and verification of accreditation;
- (13) Residency program, including year of completion, and verification of accreditation;
- (14) Specialty board certification, including date of issue and expiration date, if any;
- (15) The license number, date of issue, and expiration date of the full, unrestricted medical license issued by state of principal license;
- (16) The license number, date of issue, and expiration date of the expedited license issued by a member state;
- (17) The license number, date of issue, and expiration date of the license renewed by a member state.

“Expedited license” means a full and unrestricted medical license promptly issued by a member state to an eligible applicant through the process set forth in the Compact and its administrative rules.

“Letter of qualification” means a notification issued by a state of principal license that expresses an applicant’s eligibility or ineligibility for expedited licensure through the processes set forth in the Compact and its administrative rules.

2.3 Collection and dissemination of core data set

- (1) The core data set is collected from the applicant by the state of principal license through the expedited licensure process set forth in administrative rule 5.5.
 - (a) The state of principal license shall submit an applicant’s core data set to the Interstate Commission when the state of principal license issues a letter of qualification, verifying or denying the applicant’s eligibility for expedited licensure through the compact.
 - (b) The Interstate Commission shall maintain an applicant’s core data set in a coordinated information system established and maintained by the Interstate Commission.
 - (c) The Interstate Commission shall distribute an applicant’s core data set to all member states that issue an expedited license to the applicant.
 - (d) The Interstate Commission shall make available to any member state the core data

- set of an applicant for a letter of qualification or a physician who is issued an expedited license through the Compact.
 - (2) A member state, using a form provided by the Interstate Commission, shall collect, verify and provide to the Interstate Commission the following information for inclusion in the core data set for each physician who is issued an expedited license by the member state:
 - (a) The license number, date of issue, and expiration date of the full, unrestricted medical license issued by the member state.

2.4 Maintenance of core data set

The accuracy of information maintained in a core data set, to the extent it is possible to achieve accuracy through the expedited licensure process and licensure renewal process, shall be the responsibility of member states.

A state of principal license or any member state shall verify and submit to the Interstate Commission an amendment to correct a core data set of an applicant for a letter of qualification or a physician who is issued an expedited license through the Compact. Upon receipt of information from a member state to correct data, the Interstate Commission shall disseminate a notice to all member states that a core data set has been amended.

2.5 Availability of information in coordinated information system

The Interstate 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.

2.6 Federal criminal records check information – This information may not be shared with the Interstate Commission

- (1) Communication between a member board and the Interstate Commission and communication between member boards regarding verification of physician eligibility for licensure through the Compact shall not include any information received from the Federal Bureau of Investigation relating to a federal criminal records check performed by a member board under Public Law 92-544 pursuant to Section 1 of the Compact and rules 5.5(1)(c) and 5.5(2)(b) (2).
- (2) Federal Bureau of Investigation information obtained by a member board MAY NOT be shared with the Interstate Commission.

RULE ON COMPLIANCE AND ENFORCEMENT

ADOPTED: November 16, 2018

EFFECTIVE: November 16, 2018

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

1. **Section 7.2, was replaced in its entirety with all sub-paragraphs altered to more accurately reflect the process for the resolution of disputes between member states. – November 16, 2021**

Chapter 7 – Compliance and Enforcement

7.1 Authority

This chapter is promulgated by the Interstate Commission pursuant to the Interstate Medical Licensure Compact section 19. The rule shall become effective upon adoption by the Interstate Commission.

7.2 Dispute resolution

- 1) Any disputes between member states shall be presented to and mediated by the Executive Committee of the Interstate Commission.
- 2) Before submitting a complaint to the Executive Committee, the member state(s) shall attempt to resolve the issue(s) by bringing the matter to the attention of the Executive Director. Within 30 calendar days, the Executive Director shall clarify the issue(s) and shall provide a recommended resolution.
- 3) The Executive Director, after obtaining information from all member states involved, shall provide a statement summarizing the issue(s) raised and a recommended resolution of the matter.
- 4) Within 10 calendar days, any member state that is not satisfied with, or cannot comply with, the recommended solution, shall provide the Secretary of the Executive Committee a written statement, not to exceed five pages.
- 5) The Secretary of the Executive Committee shall provide a copy of the written statement to the other member state. That member state shall be invited to provide a written response to the Secretary of the Executive Committee, not to exceed five pages, which must be received within 30 calendar days.
- 6) The Secretary of the Executive Committee shall place this matter on the agenda of the next Executive Committee and notify the member states of the date and time of the meeting, including providing copies of the written statement and response.
- 7) The Executive Committee shall serve as the party responsible for determining potential resolutions to the conflict and shall take action to mediate the concerns with the intention of developing a mutually agreeable resolution.
- 8) The meeting(s) to discuss this matter shall be considered confidential and closed to the public in accordance with IMLC Statute, Section 11, paragraph (h).
- 9) The Executive Committee shall first seek a recommendation to which the member states mutually agree resolves the issue.
- 10) The Executive Committee shall initiate the Default Procedures outlined in IMLC Statute, Section 18, in order to create a binding resolution to the matter, should the member states be unable to find a mutually agreeable resolution.

#9 – POLICY ON INVESTMENT STRATEGIES

ADOPTED: June 8, 2021

EFFECTIVE: June 8, 2021

REVIEWED: N/A

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

- November 16, 2021 – changes were made to the following paragraphs = II, VI, VII, VIII, IX, X, and XI

I. POLICY STATEMENT

The Interstate Medical Licensure Compact (IMLC) Statute Section 12, paragraph (u), states that the Interstate Medical Licensure Compact Commission (IMLCC) may perform such functions as may be necessary or appropriate to achieve the purpose of the Compact.

This policy establishes the fiduciary process for investing its cash assets in order to maximize the return on investment while minimizing risk and expense. All transactions will be for the sole benefit of the IMLCC.

II. PURPOSE

The purpose of this policy is to promote the stability of the IMLCC as it moves forward toward the goal of self-sustainment through the moderation of its revenue and efficiency of its financial management. Pursuant to that purpose is the development and growth of five key reserve funds to be managed collectively and set aside for the support and unfettered use by the IMLCC for its growth and sustainability, namely the Restricted Capital Reserve Fund, the Restricted Special Project Reserve Fund, the Restricted IT Reserve Fund, the Restricted Reserve Fund and the Unrestricted General Fund. Paramount to this purpose are these overriding objectives:

- Ensure a uniform understanding of the IMLCC's cash assets.
- Establish a methodology for investing the cash assets.
- Define responsibilities.
- Authorize the IMLCC Treasurer and Executive Director to take the actions necessary to implement this policy and manage the investment portfolio.
- Create a process to identify target asset allocations, permissible investments and diversification requirements.
- Facilitate the Professional Fund Manager's understanding of liquidity needs related to the IMLCC's internal administrative growth assumptions for the next ten years, namely consistent growth leading to full state acceptance and ultimate sustainability.

III. DEFINITIONS

Cash Assets – Assets consisting of cash and items readily convertible to cash, such as funds held in saving and checking accounts.

Investment Strategy – A prudent methodology for investing cash in investment vehicles, such as stocks and bonds, and other financial investments.

Investment Risk Factor – The risk of investments declining in value because of economic developments or other events that affect the entire market. The applicable types of market risk are equity risk, sector risk, liquidity risk, interest rate risk, and currency risk.

Professional Fund Manager – An organization or individual responsible for the day-to-day management of an investment portfolio.

Expense Ratio – The yearly cost of a fund investment, whether it makes or loses money. It covers investment management, marketing and administrative costs.

Fund Return – The amount a fund earned during a specified time period (1, 3, 5, 10 years), minus the management fees and other costs. Often stated as a percentage of the money invested. For future return estimate purposes, investors may consider how the fund has done over various time periods in the past.

Asset mix – The percentage distribution of assets in a portfolio among the three major asset classes: cash and cash equivalents, fixed income (bonds) and equities (shares)

IV. GENERAL PROVISIONS

1. All transactions shall be for the sole benefit of the IMLCC.
2. The Budget Committee will conduct an annual review of the IMLCC’s investment assets to verify the existence and marketability of the underlying assets or satisfy themselves that such a review has been conducted in connection with an independent audit (if one should exist) of the IMLCC’s financial statements.
3. Any investment that is not expressly permitted under this Policy must be placed on the agenda and approved by the full commission at a regularly scheduled meeting.
4. The Treasurer and Executive Director will endeavor to operate the IMLCC’s investment program in compliance with all applicable state, federal and local laws and regulations concerning management of investment assets [including IRC §4944 if the IMLCC is classified as a private foundation for federal tax purposes.]
5. Investments will be diversified with a view to minimize risk.

V. AUTHORITY TO ACT AND DELEGATION OF RESPONSIBILITY

1. The Commissioners of the Interstate Medical Licensure Compact Commission have the ultimate responsibility for the investment and management of the IMLCC’s investment assets.
2. This responsibility is exercised by the Commissioners through the IMLCC Budget Committee.
3. The Budget Committee may authorize the Treasurer and the Executive Director to act on its behalf in the execution of this policy and the Budget Committee’s directives;

including but not limited to retaining a Professional Fund Manager and implementing the investment of cash assets.

4. The Budget Committee shall establish a regular reporting process for:
 - a. Monitoring compliance with this policy;
 - b. Reviewing the performance of the investment strategy; and
 - c. Considering changes to the policy or investment strategy.
5. The Budget Committee may authorize the Treasurer and the Executive Director to hire or retain the services of outside experts such as investment consultants or investment managers.

VI. RESPONSIBILITIES OF THE TREASURER AND EXECUTIVE DIRECTOR

The Treasurer and Executive Director are charged with the responsibility of managing the investment assets of the IMLCC. The specific responsibilities, as applicable, include:

1. Communicating changes to the IMLCC’s financial and liquidity needs to the Professional Fund Manager on a timely basis through e-mail or personal contact;
2. Determining the IMLCC’s risk tolerance and investment horizon with tools utilized by the Professional Fund Manager;
3. Establishing reasonable and consistent investment objectives, policy guidelines and allocations which will direct the investment of the assets, to be reviewed by the Commissioners on an annual basis and communicated to the Professional Fund Manager;
4. Prudently and diligently selecting one or more qualified investment professionals, including investment managers(s), investment advisor(s), and custodian(s), collectively referred to as “Professional Fund Manager”;
5. Routinely evaluating the performance of the Professional Fund Manager to assure adherence to policy guidelines and to monitor investment objective progress; and
6. Developing and enacting proper control procedures; e.g., replacing investment manager(s) due to a fundamental change in the investment management process, or for failure to comply with established guidelines.

VII. RESPONSIBILITY OF PROFESSIONAL FUND MANAGER

1. The Professional Fund Manager will invest assets placed in their care in accordance with this policy;
2. The Professional Fund Manager must acknowledge through the standard application process utilizing a signed client agreement, acceptance of responsibility as a fiduciary;
3. The Professional Fund Manager will have full discretion in making all investment decisions for the assets placed on the Professional Fund Manager’s discretionary platform.
4. The specific responsibilities include:
 - i. Discretionary investment management, including decisions to buy, sell, or hold individual securities, and to alter allocation within the guidelines established in this statement;

- ii. Reporting, on a timely basis, quarterly investment performance results;
- iii. Communicating opinion on major changes in the economic outlook, investment strategy, or any other factors that may affect implementation of investment process or performance of invested assets;
- iv. Informing the Commissioners, or if authority is delegated, the Treasurer and Executive Director, regarding any changes in portfolio management personnel, ownership structure, investment philosophy, etc which the Professional Fund Manager determines to be impactful to the IMLCC's investment portfolio.;
- v. Administering the IMLCC's investments prudently and without compromising quality of service. These costs include, but are not limited to, management and custodial fees, consulting fees, transaction costs and other administrative costs chargeable to the IMLCC;
- vi. Providing contact information (name, address, email, and phone number) and availability to the Treasurer and Executive Director that allows for ease of administration and service; and
- vii. Annually reviewing this Policy for any modifications, and implementing such changes into investment management decisions.

VIII. GENERAL INVESTMENT GUIDELINES

1. A copy of this policy shall be provided to the Professional Fund Manager.
2. The IMLCC is a tax-exempt organization as described in section 501(c)(6) of the Internal Revenue Code. This tax-exempt status should be taken into consideration when making IMLCC investments.
3. The IMLCC is expected to operate into perpetuity; therefore, a minimum of a 5-year investment horizon must be employed. Interim fluctuations should be viewed with the appropriate perspective.
4. All funds invested in cash or cash alternatives will be maintained with a zero to very low risk tolerance in order to keep cash available for payments to state boards, tax obligations and other anticipated expenses. These cash funds may be held outside the discretion of the Professional Fund Manager.
5. Transactions will be executed at a reasonable cost, taking into consideration prevailing market conditions, services and research provided by the executing broker.
6. Permitted investments include:
 - i. Investment portfolios with a risk factor asset mix risk scale higher than a low- to moderate-range of an equivalent measurement.
 - ii. Investment portfolios with an asset mix of no greater than 60% equity/ 40% fixed income.
 - iii. Investment portfolios with a greater than 0.20% Expense ratio.
 - iv. Investment portfolios with a positive average 5-year rate of return.
7. No individual fixed income security shall have an equivalent credit quality below investment grade at the time of purchase, defined as:
 - i. BBB by Standard & Poors for straight bonds and convertibles.
 - ii. Baa3 by Moody's Investor Service for straight bonds and convertibles.

- iii. A1 by Standard & Poors for short term securities.
 - iv. P1 by Moody's Investor Service for short-term securities.
8. The following transactions are prohibited:
 - i. Purchase of non-negotiable securities;
 - ii. Derivatives;
 - iii. Individual high risk or junk bonds, although a diversified Mutual Fund or ETF with such investments may be allowed;
 - iv. Private placements;
 - v. Precious metals;
 - vi. Individual commodities or commodity future contracts;
 - vii. Short sales;
 - viii. Any margin transactions;
 - ix. Straddles;
 - x. Warrants;
 - xi. Options;
 - xii. Leverage or letter stock.

IX. DIVERSIFICATION

1. The IMLCC shall maintain a reasonable diversification of investment assets between asset classes and investment categories at all times.
2. Individual investments in company shares of any one company shall not exceed 5% of the portfolio nor shall the total securities position (fixed income and equity) in any one company exceed 10% of the portfolio.
3. Reasonable asset sector allocation targets for professionally managed investments shall be maintained. No more than 25% of the entire portfolio may be invested in the securities of any one industry sector.
4. Investments within the managed portfolio should be readily marketable under the Professional Fund Manager's trading platform.
5. The investment portfolio may not be a blind pool; each investment must be available for review.

X. ASSET ALLOCATION

1. The asset allocation policy will be predicated on the following factors:
 - i. Historical performance of capital markets adjusted for the perception of the future short- and long-term capital market performance;
 - ii. The correlation of returns among the relevant asset classes;
 - iii. The perception of future economic conditions, including inflation and interest rate assumptions;
 - iv. Liquidity requirements for the projected grants and other charitable expenditures; and
 - v. The relationship between the current and projected assets of the IMLCC and projected liabilities.

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2. Rebalancing will be done at least on an annual basis or more frequently as advised and recommended by the Professional Fund Manager.
3. Targeted Allocation Range:

TARGET ALLOCATION RANGE	TARGET	RANGE LIMITS
Cash & Equivalents	15%	10 - 100%
Fixed Income	45%	20 - 60 %
Equities: Domestic Large Cap	20%	15 - 50%
Equities: Domestic Small/Mid Cap	15%	0 - 20%
Equities: International	5%	0 - 15%

XI. PERFORMANCE

Performance objectives are to be measured by the IMLCC met on a net of fees basis. The investment performance of each asset allocation class will be measured on two levels: First, against inflation objectives for the IMLCC and Second, against index objectives for individual portfolio components. Investment performance shall be measured no less than quarterly on a net of fees basis. Performance shall be evaluated on a three-to-five-year basis to allow for market fluctuations and volatility

XII. RESPONSIBILITY

The Treasurer 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 Treasurer may delegate administration and maintenance of this policy to the Executive Director. This policy shall be reviewed by the IMLCC Budget Committee and must be renewed prior to the start of each fiscal year.

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





**Interstate
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