



ARIZONA TELEMEDICINE PROGRAM

Navigating Interstate Compacts & Telehealth Policy Updates

PRESENTERS

Carrie Foote BS, BA
Associate Director, Administration
Arizona Telemedicine Program
College of Medicine Tucson
University of Arizona



Michael Holcomb, BS
Interim Director & Associate Director, IT
Arizona Telemedicine Program
College of Medicine Tucson
University of Arizona



Disclaimer

The information contained and delivered in this presentation is for educational and informational purposes only and is not legal advice.

Disclosures

Neither Ms. Foote nor Mr. Holcomb have any conflicts of interest to disclose.

Key Discussion Points

- Cross-State Licensure Pathways
- The Impact of Licensure Compacts on Telehealth
- Overview of Interstate Licensure Compacts
- Enhancing Healthcare Access Through Interstate Licensure Compacts
- National Overview of Interstate Compacts
- Arizona Interstate Compacts & Telehealth Registration Process
- Recent Telehealth Policy Updates
- Question & Answer

Cross-State Licensure Pathways

- ❖ Full State License
- ❖ Temporary Practice Laws
- ❖ Licensure Reciprocity
- ❖ Compacts
- ❖ Telehealth Registration

The Impact of Licensure Compacts on Telehealth

- ❖ Telehealth is generally considered rendered at the physical location of the patient.
- ❖ Interstate compacts simplify licensing by allowing providers to practice across state lines with a valid home-state license.
- ❖ Compacts are a key tool for enabling out-of-state practitioners to deliver care across state lines.

Overview of Interstate Licensure Compacts

Definition of Compacts

Purpose of Compacts

How Compacts Work

Compact Development Process

Legal Considerations

Resource: <https://www.cchpca.org/topic/cross-state-licensing-professional-requirements/>

Enhancing Healthcare Access Through Interstate Licensure Compacts

Improves Access
& Continuity of
Care

Enhanced
Emergency
Response

Strengthens
Workforce
Capacity

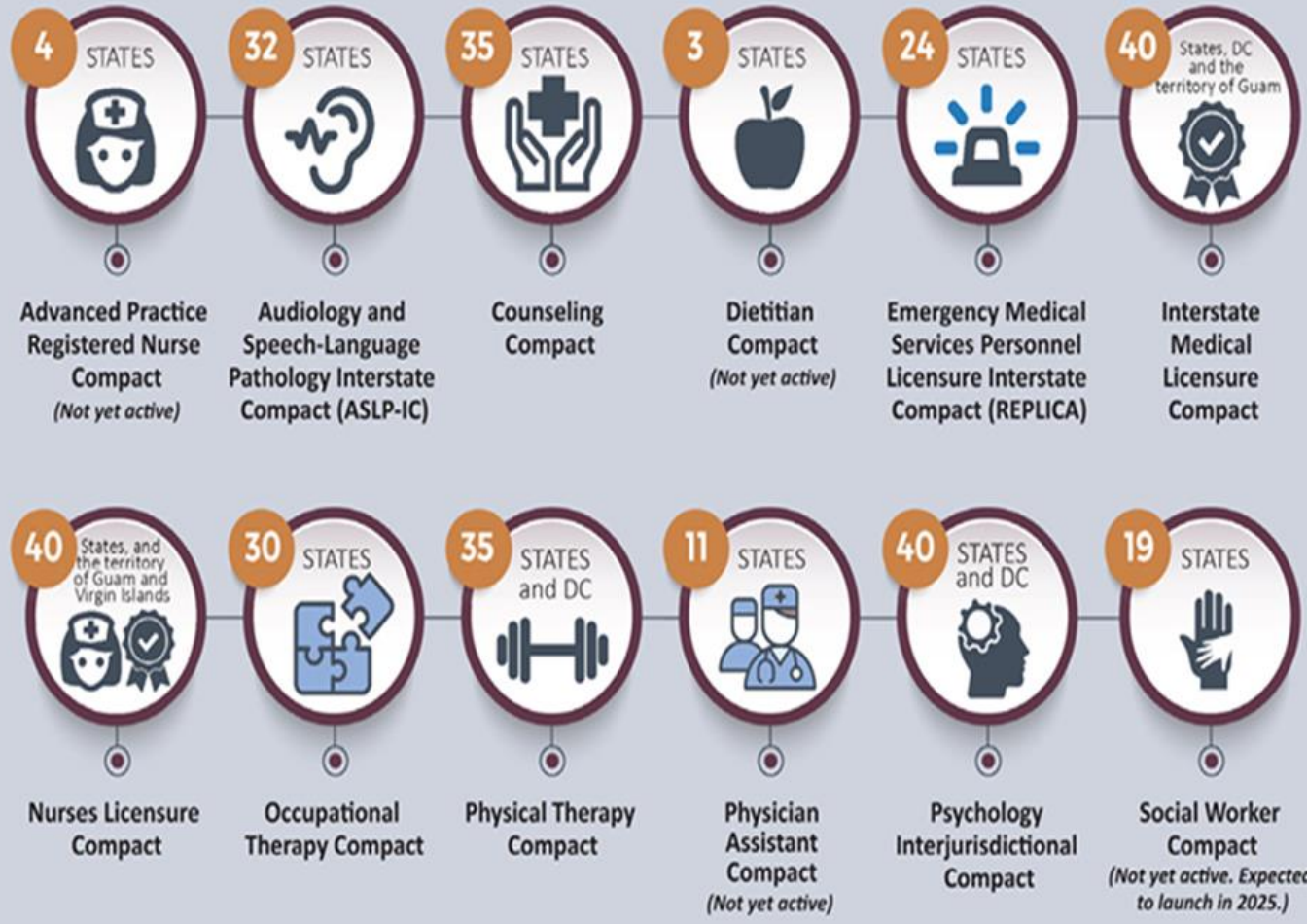
State
Collaboration &
Oversight

Limitations of
Interstate
Licensure
Compacts

Proposed
Alternative:
Telemedicine
Registration
Compact

National Overview of Interstate Compacts

Adoption of Interstate Compacts continues to be common for states. Here are the numbers:

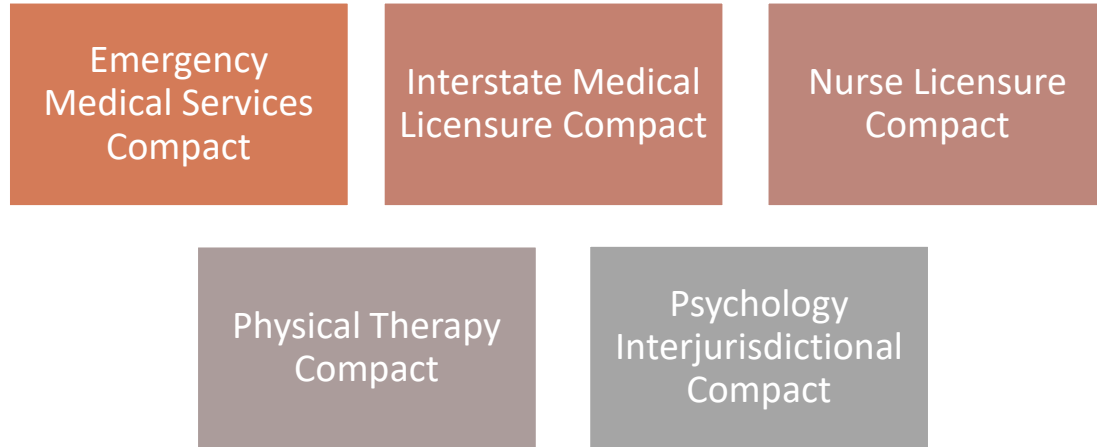


7 healthcare interstate compacts have been adopted by more than half of US States and Territories.

source: https://www.cchpca.org/2024/11/Fall2024_infographicFINAL.pdf

Statuses of Healthcare Professions Interstate Compacts

Operational Compacts



Activated Compacts Not Yet Operational



Not Activated Yet



In Development



Healthcare Interstate Compacts (continued)

Compact Name	Is Compact Operational?	Year Arizona Joined	Single License or Compact Privilege to Practice in Multiple Compact States?	Total # of (US States/Territories /DC) with Legislation Enacted	Total # of (US States/Territories/ DC) with Legislation Pending
Advanced Practice Registered Nurse Compact	No		Yes	4	2
Audiology and Speech Language Pathology Interstate Compact	Expected 2025		Yes	35	8
Counseling Compact	Expected 2025	2024	Yes	38	3
Dentist and Dental Hygienist Compact	No		Yes	10	15
Dietitian Licensure Compact	No	NA	Yes	4	18
Emergency Medical Services Personnel Licensure Compact	Yes		Yes	24	
Interstate Medical Licensure Compact	Yes	2016	No	42	5
Nurse Licensure Compact	Yes	2016	Yes	43	6
Occupational Therapy Licensure Compact	Expected 2025	2022	Yes	31	8
PA Licensure Compact	No		Yes	13	11
Physical Therapy Licensure Compact	Yes	2016	Yes	39	4
Psychology Interjurisdictional Compact	Yes	2016	Yes	42	7
Social Work Licensure Compact	No	2024	Yes	22	15

As of February 16, 2025, per compacts' websites

Summary of Steps to Obtain Interstate Medical Licensure Compact (IMLC) Member State Medical Licenses Using The IMLC Service

1. Hold a full, unrestricted medical license in an IMLC member state that can serve as a State of Principal License (SPL)
2. Obtain a Letter of Qualification (LOQ) from the Medical Board in your SPL
3. Apply for licenses in other IMLC member states via the IMLC
 - a. Pay required fees to IMLC and fees to each IMLC member state that you are applying for a license from
 - b. Submit fingerprints to designated criminal justice agency in their SPL for a criminal background check
4. Receive medical licenses from each of the IMLC member states that have approved your application.
5. Provide any additional information required by each state you have received a medical license from.

Notes: IMLC does not provide medical licenses; IMLC provides an expedited process to obtain medical licenses from IMLC member states; IMLC maintains a database of IMLC applicants and physicians that includes disciplinary information.

<https://imlcc.com/information-for-physicians/>

Summary of the Nurse Licensure Compact (NLC) Multistate License

1. Issued to eligible nurses (RNs, LPNs, and LVNs) in their primary state of residence (PSOR) that is also an NLC member state.
2. Nurses with an NLC multistate license can practice in any of the NLC member states
 - a. Nurses must know and follow the laws and rules of the state(s) that they practice in
3. An NLC member state has the power to remove privileges for a nurse to practice in that state
4. Disciplinary actions against a nurse practicing via privileges afforded by the NLC are reported to the nurse's PSOR. Their PSOR Nurse License Board may also take disciplinary actions
5. License and disciplinary information of all RNs, LPNs, and LVNs is stored in a national nurse database called Nursys.

<https://www.nursecompact.com/FAQs.page>

Arizona's Telehealth Provider Registration

HB 2454 – Effective 1/1/2022

- Established a telehealth provider registration process for out-of-state providers
- Allows out-of-state healthcare providers to register with AZ's applicable health care provider regulatory board or agency that licenses comparable health care providers in this AZ on an application prescribed by the board or agency.

Key Features of the Registration Process

- Eligibility
- Standards of practice
- Registrations
- Compliance with all applicable AZ laws and rules
- Liability insurance
- Patient protections
- Consent to AZ jurisdiction

<https://www.azleg.gov/ars/36/03606.htm>

Medicare Telehealth Flexibilities (MTFs)

MTFs were first implemented in 2020 in response to COVID-19 PHE

MTFs expanded provider types, removed geographic restrictions, and more

Most MTFs have been extended multiple times by Congress in years since

Some MTFs have been made permanent and a few have been discontinued

MTFs will expire on March 31, 2025, if not extended or made permanent by Congress

Current List of Medicare Telehealth Services

<https://www.cms.gov/medicare/coverage/telehealth/list-services>

MTFs Extended Through March 31, 2025

Originating Site	<ul style="list-style-type: none">• Patient's home remains an eligible originating site for any telehealth service.
Provider Types	<ul style="list-style-type: none">• Reimbursement continues for providers eligible to deliver telehealth and bill Medicare.
Acute Hospital Care at Home (AHCaH)	<ul style="list-style-type: none">• Reimbursement to hospitals with AHCaH programs continues.
Hospice Care	<ul style="list-style-type: none">• Continue to use a telehealth visit for hospice recertifications.
In-Person	<ul style="list-style-type: none">• Waive in-person visit requirements within 6-months of a tele-behavioral health visit and annually thereafter.
Audio-Only	<ul style="list-style-type: none">• Audio-only eligible for reimbursement with some caveats (e.g., definition and codes).
FQHCs & RHCs (9 additional months)	<ul style="list-style-type: none">• CMS noted to follow the 2025 PFS to provide non-mental health services and waive in-person visit requirement for mental health services to end of 2025.

Note: First dollar coverage of High Deductible Health Plans – Health Savings Accounts were not extended

Recently Proposed Rules

- **A Proposed Rule by the Drug Enforcement Administration on 01/17/2025: Public Comments Due by March 18, 2025**
 - **Special Registrations for Telemedicine and Limited State Telemedicine Registrations**
 - <https://www.federalregister.gov/documents/2025/01/17/2025-01099/special-registrations-for-telemedicine-and-limited-state-telemedicine-registrations>
- **A Proposed Rule by the Health and Human Services Department on 01/06/2025: Public Comments Due by March 7, 2025**
 - **HIPAA Security Rule To Strengthen the Cybersecurity of Electronic Protected Health Information**
 - <https://www.federalregister.gov/documents/2025/01/06/2024-30983/hipaa-security-rule-to-strengthen-the-cybersecurity-of-electronic-protected-health-information>



[SUBMIT A PUBLIC COMMENT](#)

Recent Final Rules

- **Two rules by the Drug Enforcement Administration and the Health and Human Services Department published on 01/17/2025**
 - ✓ **Expansion of Buprenorphine Treatment via Telemedicine Encounter**
 - <https://www.federalregister.gov/documents/2025/01/17/2025-01049/expansion-of-buprenorphine-treatment-via-telemedicine-encounter>
 - ✓ **Continuity of Care via Telemedicine for Veterans Affairs Patients**
 - <https://www.federalregister.gov/documents/2025/01/17/2025-01044/continuity-of-care-via-telemedicine-for-veterans-affairs-patients>



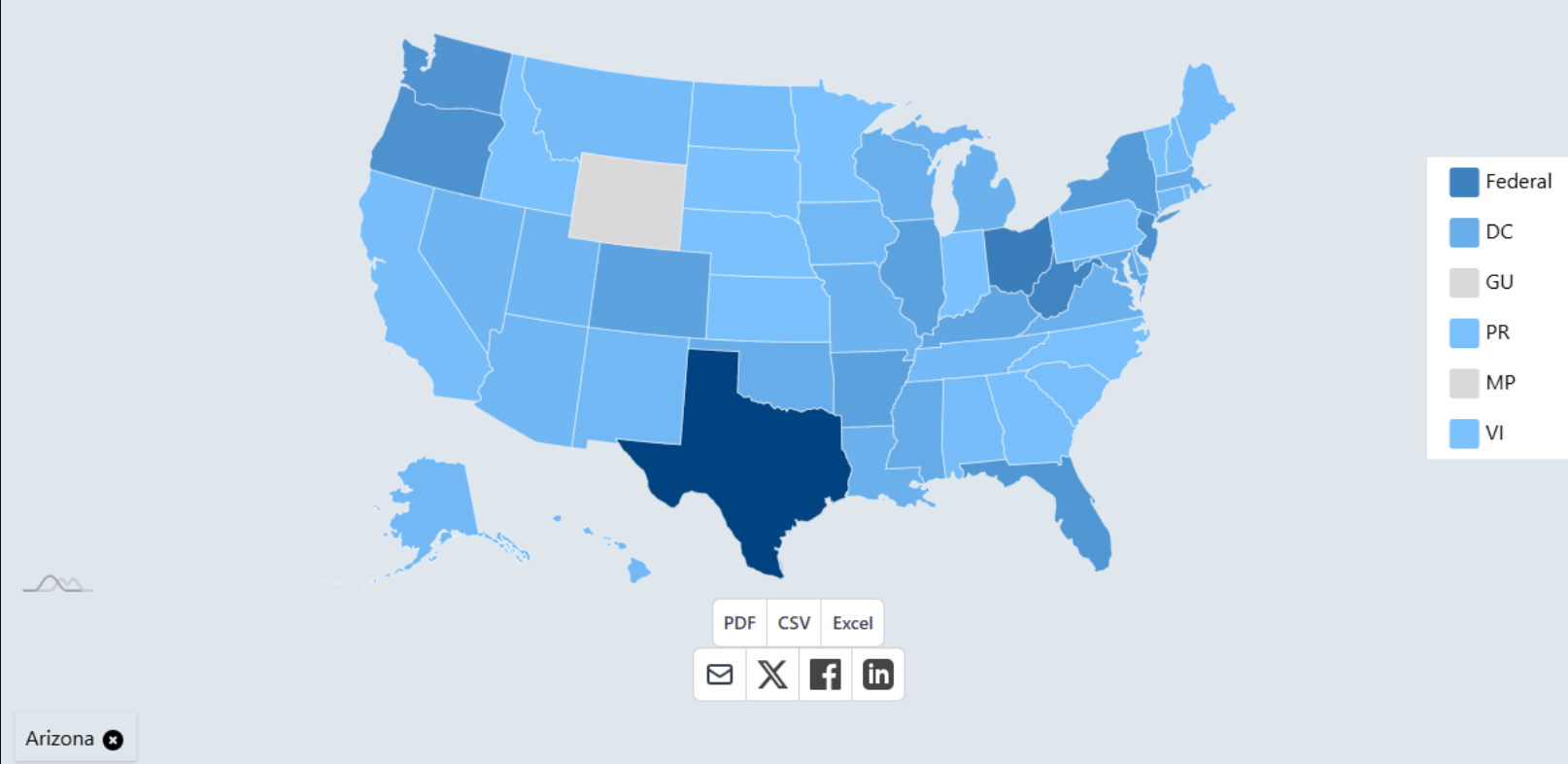
FEDERAL REGISTER
The Daily Journal of the United States Government





Telehealth Legislation and Regulation

Utilize the interactive 50 state legislation and regulatory tracking tool, located below, to browse telehealth legislation and regulation across the nation for the current legislative session. Note that while Puerto Rico legislation is included, they have not been analyzed for content as the bills are currently only available in Spanish



As of February 2025, Arizona has had:

- Six telehealth-related bills introduced
- Two notices of proposed rulemaking

<https://www.cchpca.org/pending-legislation/>

Navigating the Digital Health Legal Landscape: User Guide to State Data Privacy Laws

TUESDAY, MARCH 11, 2025
12:00pm PDT (Arizona time), 1:00pm MDT, 2:00pm CDT, 3:00pm EDT

FREE WEBINAR

The evolving landscape of federal and state data privacy laws presents unique challenges for healthcare providers, digital health companies, and telehealth platforms. This session provides a practical guide for navigating the complex web of laws that impact the use and disclosure of health information. Attendees will gain a better understanding of how current and emerging state laws intersect with HIPAA, along with actionable insights for implementing compliance strategies when delivering virtual care services across multiple state jurisdictions.

PANELISTS:



John F. Howard
Senior Attorney
Clark Hill PLC



Chase Millea
Attorney
KO Law PC



Claudia E. Stedman
Associate Attorney
Snell & Wilmer LLP

MODERATOR:



Tara Sklar, JD, MPH
Associate Director Telehealth Law & Policy
Arizona Telemedicine Program

THE TOPICS FOR THIS WEBINAR ARE:

- Key developments to HIPAA affecting digital health operations.
- Common trends in state data privacy legislation.
- Practical strategies for enhancing data privacy and staying abreast of the changing legal landscape.



Registration: <https://telemedicine.arizona.edu/>

or
Scan QR Code



For more information contact Melanie Esher, MAdm at mesher@telemedicine.arizona.edu

The State Bar of Arizona does not approve or accredit CLE activities for the Mandatory Continuing Legal Education requirement. This activity may qualify for up to 1 hour of CLE credit toward your annual requirement for the State Bar of Arizona.

This webinar is made possible through funding provided by Health Resources and Services Administration, Office for the Advancement of Telehealth (U1U42527).

Compact Information Resources

- State Specific Compact Information
 - Center for Connected Health Policy (CCHP) – [Licensure Compacts](#)
- July 2024 Report on Out-of-State Telehealth Provider Policies
 - CCHP – [The Cross-State Licensure Continuum: Out-of-State Telehealth Provider Policies](#)
- State Map of Out-of-State Telehealth Provider Policies
 - CCHP - <https://www.cchpca.org/policy-trends/> 
- August 2024 Webinar Cross-State Licensure & Compacts Webinar
 - CCHP - <https://www.cchpca.org/resources/cross-state-licensure-compacts-webinar/>
- Medicare Clarifies Recognition of Interstate License Compact Pathways
 - CMS.gov Medicare Learning Network - <https://www.cms.gov/files/document/se20008.pdf>
- National Center for Interstate Compacts Website
 - <https://compacts.csg.org/>
- Health Resources and Services Administration – Licensure Compacts Descriptions
 - <https://telehealth.hhs.gov/licensure/licensure-compacts>

Healthcare Interstate Compact Websites

Advanced Practice Registered Nurses Compact	https://www.aprncompact.com/about.page#map
Audiology & Speech Language Pathology Interstate Compact	https://aslpcompact.com/compact-map/
Counseling Compact	https://counselingcompact.org/map/
Dentist and Dental Hygienist Compact	https://ddhcompact.org/compact-map/
Interstate Medical Licensure Compact	https://www.imlcc.org/participating-states/
Nurse Licensure Compact	https://www.nursecompact.com/
Occupational Therapy Licensure Compact	https://otcompact.gov/compact-map/
Physical Therapy Compact	https://ptcompact.org/ptc-states
Physician's Assistant Licensure Compact	https://www.pacompact.org/
Psychology Interjurisdictional Compact (PSYPACT)	https://psypact.org/mpage/psypactmap
Social Work Licensure Compact	https://swcompact.org/compact-map/
The United States Emergency Medical Services Compact	https://www.emscompact.gov/

Related Resources

- **Arizona Private Payer Billing Guide**
 - <https://southwesttrc.org/resources/billingguides>
- **AHCCCS Telehealth Services**
 - <https://www.azahcccs.gov/AHCCCS/Initiatives/Telehealth/>
- **CCHP's CY 2025 Final Physician Fee Schedule Factsheet**
 - <https://www.cchpca.org/2024/11/CY-2025-PFS-FINAL.pdf>
- **CCHP AZ link**
 - <https://www.cchpca.org/arizona/>

Thank You!

Questions?

carriechoote@telemedicine.arizona.edu

mholcomb@telemedicine.arizona.edu



ARIZONA
TELEMEDICINE
PROGRAM

<https://telemedicine.arizona.edu>