

## **ICHP Position Statement - Compact State Pharmacist Licensure**

ICHP supports working with the Illinois Department of Financial and Professional Regulation, the National Association of Boards of Pharmacy (NABP), and Illinois legislators to establish an Interstate Pharmacist Licensure Compact.

ICHP urges a review and update of the reciprocity process for pharmacist licensure to facilitate access to telepharmacy services for patients who reside in states outside of the state where the pharmacist is located.

Furthermore, ICHP supports regulations and practices that streamline the process for pharmacists to get licensed in multiple states.

### **Rationale for this Position Statement**

The growth of large national and regional health systems, which may provide services to patients in many U.S. states, and the increased use of telepharmacy services to enhance patients' access to the counseling and clinical services of pharmacists who may be located in a different U.S. state than the patient, demands creative solutions for pharmacist licensure. Currently, there are only 2 options for pharmacists who must provide services to patients who are located in a different U.S. state than that of the pharmacist: (1) the pharmacist must be licensed by exam in multiple states so that they have a license in the state where the patient is located; or (2) the pharmacist must have a reciprocated license for the state where the patient is located. The current options are limited and are not feasible or practical for a pharmacist who needs to provide services to many patients in multiple states.

### **Background on Compact Licenses**

An interstate licensure compact refers to a mutual agreement among one or more states to expedite traditional processing that would allow a health professional to obtain additional state licenses. Currently, for physicians who practice telemedicine or who work near a state border, there is an Interstate Medical Licensure Compact, which includes 37 U.S. states, the District of Columbia, and Guam. After paying \$700 to join the Compact, a physician can obtain a state license from other participating states for a fee ranging from \$75 to \$790.

To qualify to practice medicine across state lines within the Compact, a physician must satisfy the Compact's eligibility requirements (Table 1). Physicians who are eligible can qualify to practice medicine in multiple states by completing just one application and submitting it to the Compact. If approved, they receive separate licenses from each state in which they intend to practice. The licensure application process is streamlined, and physicians receive their state licenses more quickly (since the Compact fast-tracks these applications).

Table 1. Eligibility Requirements for Physicians Who Want to Participate in the Compact

1. The physician's primary residence is in one of the states in the Compact (hereafter referred to as the state of primary licensure (SPL)).
2. At least 25% of the physician's practice of medicine occurs in the SPL.
3. The physician is employed to practice medicine by a person, business, or organization located in the SPL.
4. The physician uses the SPL as their state of residence for U.S. Federal Income Tax purposes.
5. The physician must have graduated from an accredited medical school and must have completed an ACGME-accredited graduate medical education program (residency).
6. The physician must have completed each component of the national licensing exam.
7. The physician must hold a current specialty board certification.
8. The physician must not have any history of disciplinary actions toward their medical license, not have any criminal history, not have any history of controlled substance actions toward their medical license, and not currently be under investigation.

The licensing is all state based. The Compact does not issue a "Compact License."

For nurses, there is a Nurse Licensure Compact (NLC). Thirty-nine states have joined the compact. This agency differs from the Medical Licensure Compact in that all state licensing boards in the compact have agreed to a set of uniform licensure requirements. Once the nurse applies and is approved by the NLC, the nurse receives a Multistate license, which is effective in the 39 states. A nurse with a Multistate license can provide in-person nursing services or can practice telenursing in any or all compact states.

Currently, there is no compact license option for pharmacists.

### **Background on Pharmacist Licensure Reciprocity Process**

The pharmacist licensure reciprocity process is also known as the license transfer process. NABP maintains a current listing of requirements for license transfer by state. That listing shows that 11 states (including Alabama, Arizona, Arkansas, Connecticut, Georgia, Louisiana, Nevada, New Hampshire, New Jersey, New Mexico, North Carolina) require pharmacists to maintain their licensure from the state in which they originally passed NABPLEX, MPJE, and state jurisprudence exams to qualify for a reciprocated licensure in another state. In addition, 48 states require a licensed pharmacist in one state to take MPJE and/or state jurisprudence exams to qualify for a reciprocated license in a second state. Consideration should be given to streamlining the license reciprocity application process particularly for a licensed pharmacist in good standing for a certain minimum length of time to qualify for pharmacist licensure reciprocity in another state without having to pass additional exams.

### **References:**

1. Interstate Medical Compact (<https://www.imlcc.org/>, last accessed Feb 8, 2023).
2. Nurse Licensure Compact (<https://www.ncsbn.org/compacts/nurse-licensure->

[compact.page](#), last accessed Feb 8, 2023).

3. Mehrotra, A. Nimgaonkar A, Richman B. Telemedicine and medical licensure-potential paths for reform. *New Engl J Med* 2021;384;8:687-690.

4. <https://nabp.pharmacy/wp-content/uploads/2020/licensure-transfer-state-restrictions-March.2023.pdf> (last accessed 9/26/2023).