

Review of Telehealth and Interstate Licensure Policies

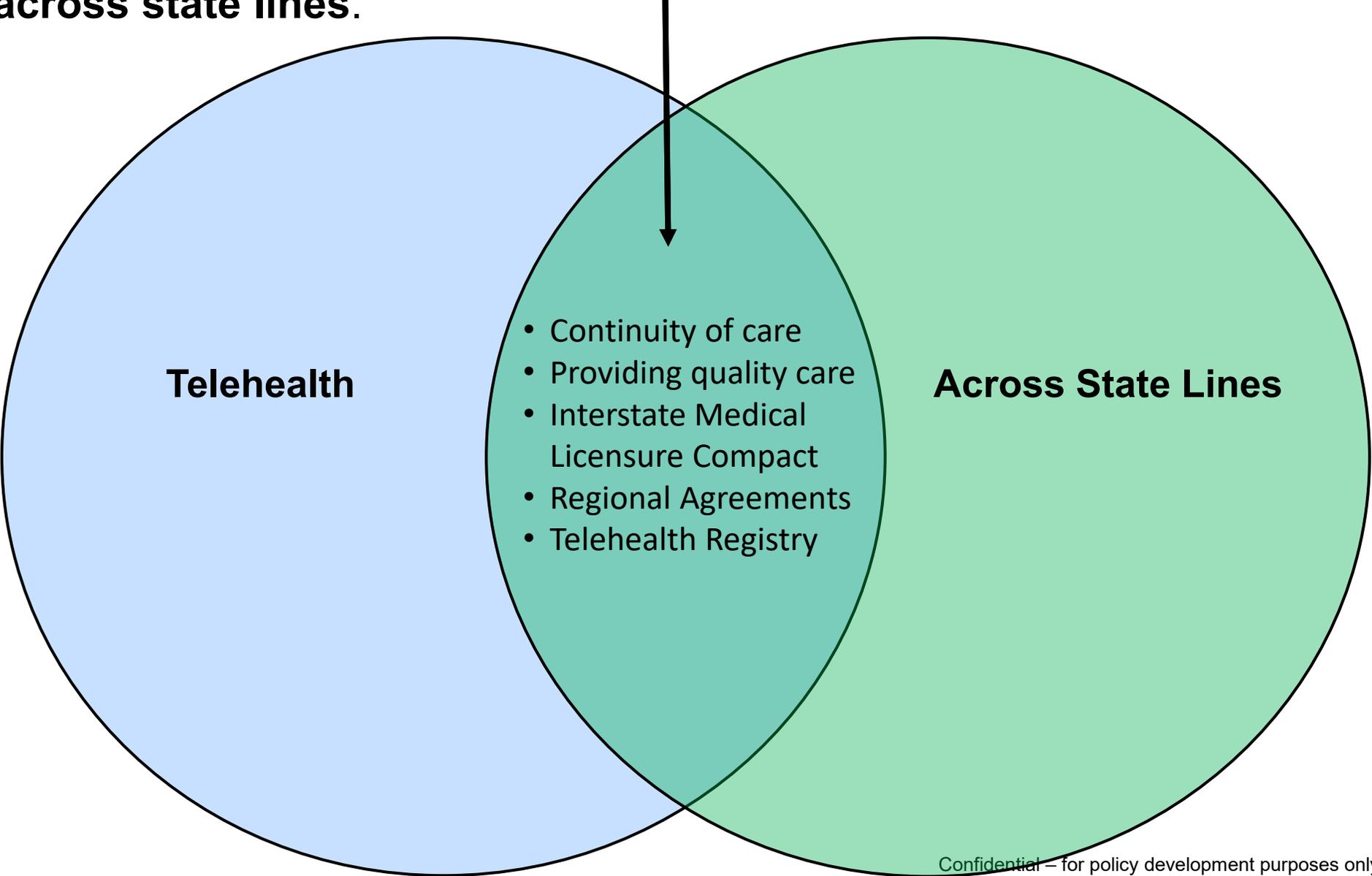
Executive Office of Health and Human Services

March 11, 2026

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Telehealth Taskforce Charge

Primary focus: address barriers and impediments to the practice of telehealth across state lines.



American Medical Association: Telehealth Licensure Issue Brief (May 2023)

| | | | |
|---|---|--|---|
|  |  |  |  |
| <p>Interstate compacts</p> | <p>Licensure by endorsement or reciprocity</p> | <p>Special purpose telehealth registries or licenses</p> | <p>Exceptions to in-state licensure requirements</p> |
| <p>Creates an expedited licensure pathways for physicians to deliver either in-person or telehealth services in more than one state</p> | <p>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</p> | <p>Allows physicians who are licensed in other states to register or obtain a special license to deliver telehealth services to in-state residents</p> | <p>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</p> |

CCHP: The Cross State Licensure Continuum, July 2024

| STATE | LIMITED LICENSURE EXCEPTIONS | TELEHEALTH LICENSE/REGISTRATION PROCESS | INTERSTATE LICENSURE COMPACTS | | | | | | | | | | | | |
|----------------------|------------------------------|---|-------------------------------|---------|----|----|-----|------|-----|----|----|-----|-----|----|--|
| | | | APRN | ASLP-IC | CC | DC | EMS | IMLC | NLC | OT | PA | PSY | PTC | SW | |
| ALABAMA | ✓ | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | |
| ALASKA | ✓ | | | ✓ | ✓ | | | | | | | | | | |
| ARIZONA | ✓ | ✓ | | | ✓ | | | | ✓ | ✓ | ✓ | | ✓ | ✓ | |
| ARKANSAS | ✓ | | | ✓ | ✓ | | | | | ✓ | ✓ | | ✓ | ✓ | |
| CALIFORNIA | ✓ | | | ✓ | ✓ | | | | | ✓ | ✓ | | ✓ | ✓ | |
| COLORADO | ✓ | | | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ | | ✓ | ✓ | |
| CONNECTICUT | | ✓ | | | ✓ | | | | ✓ | ✓ | ✓ | | ✓ | ✓ | |
| DELAWARE | ✓ | ✓ | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ | | ✓ | ✓ | |
| DISTRICT OF COLUMBIA | ✓ | | | | | | | | ✓ | ✓ | ✓ | | ✓ | ✓ | |
| FLORIDA | ✓ | ✓ | | ✓ | ✓ | | | | ✓ | ✓ | ✓ | | ✓ | ✓ | |
| GEORGIA | ✓ | ✓ | | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ | | ✓ | ✓ | |
| HAWAII | ✓ | | | | | | | | ✓ | ✓ | ✓ | | ✓ | ✓ | |
| IDAHO | ✓ | ✓ | | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ | | ✓ | ✓ | |
| ILLINOIS | ✓ | | | ✓ | ✓ | | | | ✓ | ✓ | ✓ | | ✓ | ✓ | |
| INDIANA | | | | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ | | ✓ | ✓ | |
| IOWA | ✓ | | | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ | | ✓ | ✓ | |
| KANSAS | | ✓ | | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ | | ✓ | ✓ | |
| KENTUCKY | ✓ | | | ✓ | ✓ | | | | ✓ | ✓ | ✓ | | ✓ | ✓ | |
| LOUISIANA | ✓ | ✓ | | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ | | ✓ | ✓ | |
| MAINE | | ✓ | | ✓ | ✓ | | | | ✓ | ✓ | ✓ | | ✓ | ✓ | |
| MARYLAND | ✓ | | | ✓ | ✓ | | | | ✓ | ✓ | ✓ | | ✓ | ✓ | |
| MASSACHUSETTS | | | | ✓ | ✓ | | | | | | | | | | |
| MICHIGAN | ✓ | | | | | | | | ✓ | ✓ | ✓ | | ✓ | ✓ | |

KEY

- ✓ = Limited Licensure Exceptions and/or Telehealth License/Registration Process and/or Compact Exists
- APRN = Advanced Practice Nurse Compact
- ASLP-IC = Audiology and Speech-Language Pathology Interstate Compact
- CC = Counseling Compact
- DC = Dietitians Compact
- EMS = Recognition of EMS Personnel Licensure Interstate Compact (REPLICA)
- IMLC = Interstate Medical Licensure Compact
- NLC = Nurses Licensure Compact
- OT = Occupational Therapy Compact
- PA = Physician Assistant Compact
- PSY = Psychology Interjurisdictional Compact (PSYPACT)
- PTC = Physical Therapy Compact
- SW = Social Work Licensure Compact

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|----------------|------------------------------|---|-------------------------------|--------|----|----|-----|-----|-----|----|----|-----|-----|----|---|---|
| | | | APRN | ASLP-C | CC | DC | EMR | IMC | NIC | OT | PA | PSY | PTC | SW | | |
| MINNESOTA | ✓ | ✓ | | ✓ | ✓ | | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| MISSISSIPPI | ✓ | | | ✓ | ✓ | | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| MISSOURI | ✓ | | | ✓ | ✓ | | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| MONTANA | | | | ✓ | ✓ | | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| NEBRASKA | | | | ✓ | ✓ | | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| NEVADA | ✓ | ✓ | | ✓ | ✓ | | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| NEW HAMPSHIRE | ✓ | ✓ | | ✓ | ✓ | | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| NEW JERSEY | ✓ | | | ✓ | ✓ | | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| NEW MEXICO | ✓ | ✓ | | ✓ | ✓ | | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| NEW YORK | | | | | | | | | | | | | | | | |
| NORTH CAROLINA | | | | ✓ | ✓ | | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| NORTH DAKOTA | | | ✓ | ✓ | ✓ | | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| OHIO | | | | ✓ | ✓ | | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| OKLAHOMA | | ✓ | | ✓ | ✓ | | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| OREGON | ✓ | ✓ | | ✓ | ✓ | | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| PENNSYLVANIA | ✓ | | | ✓ | ✓ | | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| PUERTO RICO | ✓ | | | ✓ | ✓ | | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| RHODE ISLAND | ✓ | | | ✓ | ✓ | | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| SOUTH CAROLINA | ✓ | ✓ | | ✓ | ✓ | | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| SOUTH DAKOTA | | | ✓ | ✓ | ✓ | | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| TENNESSEE | | ✓ | | ✓ | ✓ | | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |

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|----------------|------------------------------|---|-------------------------------|--------|----|----|-----|-----|-----|----|----|-----|-----|----|---|---|
| | | | APRN | ASLP-C | CC | DC | EMR | IMC | NIC | OT | PA | PSY | PTC | SW | | |
| TEXAS | | | | ✓ | ✓ | | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| UTAH | ✓ | | ✓ | ✓ | ✓ | | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| VERMONT | ✓ | ✓ | | ✓ | ✓ | | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| VIRGIN ISLANDS | | ✓ | | ✓ | ✓ | | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| VIRGINIA | ✓ | | | ✓ | ✓ | | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| WASHINGTON | ✓ | | | ✓ | ✓ | | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| WEST VIRGINIA | ✓ | ✓ | | ✓ | ✓ | | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| WISCONSIN | | | | ✓ | ✓ | | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| WYOMING | ✓ | | | ✓ | ✓ | | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |

Federal State Medical Boards Workgroup on Telemedicine Report April 2022

| Model Guidelines | Licensing Exceptions | Standards of Care |
|--|--|--|
| <p><i>Does not alter scope of practice or authorize delivery of health care services.</i></p> <ul style="list-style-type: none">▪ Place welfare of patients first▪ Maintain acceptable and appropriate standards of care▪ Adhere to ethical codes▪ Properly supervise non-physician clinicians▪ Protect patient confidentiality | <p><i>A physician must be licensed or authorized where the patient is located.</i></p> <p>Exceptions to licensure:</p> <ul style="list-style-type: none">• Physician to physician consults• Prospective patient screening• Episodic follow-up care• Follow-up after travel• Clinical Trials | <p><i>Same standards of care and professional ethics as in-person encounter.</i></p> <ul style="list-style-type: none">• Scope of practice• Establishment of physician to patient relationship• Evaluation and treatment of the patient (including documentation and appropriate diagnostics)• Informed consent• Continuity of care and referrals• Medical records• Privacy and security of patient records |

Uniform Telehealth Act Model Language, July 2022

| | |
|---|---|
| Standard of care | <ul style="list-style-type: none">▪ Does not supplant state statutes▪ Can not create a new standard of care or new requirements exclusively applicable to telehealth |
| Exemptions to licenses for out of state practitioner | <ul style="list-style-type: none">▪ Physician consult▪ Second opinion▪ Follow up care to travelers |
| Registration system | <ul style="list-style-type: none">▪ Creates a registration system for out of state practitioners▪ Must identify the licensing boards that will participate▪ Criteria applicants must qualify for registration▪ Practitioners may be subject to disciplinary action |

MA Telehealth Interstate Policy Options

| | NE States (5)* | Legislation needed | Voluntary Process | BORIM maintains authority over discipline of traditional licensed MA physicians |
|--------------------------------|----------------|--------------------|-------------------|---|
| IMLC | 5 | ✓ | ✓ | ✓ |
| Regional Agreement | ✗ | ✗ | ✓ | ✓ |
| Telehealth Registry | 4 | ✓ | ✓ | ✓ |
| Exemptions to Licensing | 3 | ✓ | ✓ | ✓ |

*NH, VT, ME, RI, CT are represented