

MEDICAL LICENSURE PATHWAYS IN THE DMV REGION: IMLCC VS. REGIONAL RECIPROACITY

FY23 – FY26 TRENDS AND POLICY IMPLICATIONS

PRESENTERS

- Dr. Andrea Anderson, Chair of the D.C. Board of Medicine
- Suzanne Fenzel, Senior Assistant General Counsel for D.C. Board of Medicine
- Aisha Nixon, Associate Director for the Office of Health Professional Licensing Boards, DC Health

Purpose

Purpose of Today's Discussion

- Understand the origin and development of the DMV Regional Reciprocity initiative.
- Compare Regional Reciprocity with the Interstate Medical Licensure Compact (IMLCC).
- Identify the key challenges and benefits of regional licensure portability.

Why Regional Models Matter

- The DMV region (DC, Maryland, Virginia) is a high-mobility, high-demand area.
- Regional collaboration supports telehealth expansion and workforce flexibility:
 - Enables provider mobility across state lines.
 - Reduces the administrative burden on clinicians.
 - Expands patient access to timely, high-quality care.
 - Regional (DMV) employers.

Overview of Licensure Pathways

Expedited Licensure Options

- **DMV Regional Reciprocity**
 - Available to physicians licensed in Maryland and Virginia.
 - Streamlined application process between participating states.
 - Results in individual licenses for each state.
 - Requires compliance with each state’s laws and regulations.
 - Ideal for physicians practicing in the DMV region.
- **Interstate Medical Licensure Compact (IMLCC)**
 - Offers multi-state licensure eligibility through a single application.
 - Participating states issue separate licenses, but the process is centralized.
 - Requires the designation of a State of Principal License (SPL).
 - Must meet eligibility criteria (e.g., board certification, no disciplinary actions).
 - Enables broader geographic mobility for telehealth and multi-state practice.

Overview of Licensure Pathways

Comparison of Regional Reciprocity vs. IMLCC

Feature	Regional Reciprocity	IMLCC
Pathway Type	Expedited	Expedited
Fees	Paid to each state	Paid to each state
CEUs	All participating states	Home state only
License Type	Individual state licenses	Multi-state portability (via SPL)
Portability	Limited to MD & VA	Broad, across compact states
Application	Separate for each state	Centralized via IMLCC portal
Foreign-Trained Physicians	Not eligible	Eligible

Growth in Expedited Licensure Pathways

DMV Reciprocity Licenses Issued by Fiscal Year and State of Qualifying License

Fiscal Year	Maryland	Virginia	MD & VA
FY2023	80	54	21
FY2024	141	140	47
FY2025	195	166	72
FY2026*	26	16	6

* Data as of 11/07/2025

Growth in Expedited Licensure Pathways

IMLCC Licenses Issued by Fiscal Year

Fiscal Year	Licenses Issued
FY2023	137
FY2024	577
FY2025	670
FY2026*	70

* Data as of 11/07/2025

Board & Legal Collaboration & DMV MOA Overview

Collaborative Efforts Across Jurisdictions

- Joint review of Maryland and Virginia licensure requirements.
- Legal teams conducted a side-by-side analysis of statutes and regulations.
- The Board reviewed the information to determine "substantially similar".
- Identified areas for alignment to support reciprocity.
- Developed a shared framework for expedited licensure.

Memorandum of Agreement (MOA) Development

- Drafted and refined through interagency collaboration.
- Legal and policy teams from DC, MD, and VA contributed.
- Final MOA signed and implemented in FY2023.

Board & Legal Collaboration & DMV MOA Overview

Key Elements of the DMV MOA

- **Shared Eligibility Criteria**
Applicants must meet consistent standards across all three jurisdictions
- **Legislative and Regulatory Alignment**
Harmonization of rules to support mutual recognition
- **Mutual Recognition of Licensure**
Physicians licensed in one jurisdiction can apply for expedited licensure in the others
- **Defined Roles and Responsibilities**
Each board retains authority while honoring the agreement
- **Ongoing Governance**
Regular review and updates to maintain alignment and address emerging issues

Enforcement & Sensitive Case Considerations

Disciplinary Action Comparison

Feature	DMV Reciprocity	IMLCC
Enforcement Scope	State-specific	Multi-state
Trigger for Action	Varies by jurisdiction	Action in one state can trigger others
Standardization	Limited	High: Governed by IMLCC rules
Data Sharing	Informal or ad hoc	Formal, structured reporting across states

Benefits & Challenges of Expedited Licensure Pathways

BENEFITS	CHALLENGES
Reduced Processing Time	Applicant Confusion on Eligibility
Seamless Verification	Manual Conversion to Examination Pathway
Increased Access to Care	Communication Gaps Between Jurisdictions
Multi-State Practice Flexibility (<i>IMLCC</i>)	Limited Awareness of Options
Regulatory Collaboration	Ongoing Maintenance of Agreements

Key Takeaways – Dual Pathway Strategy

Why Both Pathways Matter in Our Region

- **Complementary Strengths:**
 - IMLCC provides a **standardized, streamlined process** for multi-state licensure, ideal for providers seeking broad practice reach.
 - **DMV reciprocity** supports **regional mobility**, especially for providers already licensed in neighboring states.
- **Demonstrated Growth in Our Area:**
 - **IMLCC Licenses Issued:** Over **1,000 active licenses** approved through IMLCC in our jurisdiction in the past 12 months.
 - **DMV Reciprocity Applications:** Over **481 active licenses** approved through DMV Reciprocity in our jurisdiction in the past 12 months.

Key Takeaways – Dual Pathway Strategy

Why Both Pathways Matter in Our Region

- **Strategic Benefits:**
 - IMLCC ensures uniform enforcement and credentialing standards, reducing administrative burden.
 - Reciprocity offers flexibility but remains fragmented across jurisdictions.
- **Policy Complexity:**
 - Shield laws and varying state regulations introduce legal ambiguity, affecting both pathways.
- **Bottom Line:**
 - Leveraging both IMLCC and DMV reciprocity expands access to qualified providers, enhances workforce flexibility, and supports regional healthcare delivery goals.

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CONTACTS



Aisha K. Nixon, MPT, CPM

Associate Director

Office of Health Facilities

Health System and Preparedness Administration

Aisha.Nixon@dc.gov

Phone: (202) 442-8336

Suzanne M. Fenzel, Esq.

Senior Assistant General Counsel

Counsel to the Board of Medicine

Office of the General Counsel

Suzanne.Fenzel3@dc.gov

Phone: (202) 724-8915

DC | HEALTH

GOVERNMENT OF THE DISTRICT OF COLUMBIA

2201 Shannon Place SE, Washington, DC 20020

 dchealth.dc.gov

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