



NATIONAL CENTER FOR INTERSTATE COMPACTS

Interstate Licensure Compacts and Universal Licensure Recognition Laws

FACT SHEET



Introduction

In recent years, state policymakers have used two mechanisms to enable interstate mobility of licensed professionals. Interstate licensure compacts are statutorily enacted agreements among states to allow professionals to work across state lines. Universal licensure recognition laws are enacted by a single state to grant a license by endorsement to a practitioner from

another state. These policies help solve similar problems, but there are major differences. Notably, compacts are tailored to a particular profession and allow licensees to engage in interstate practice in all compact member states, whereas universal licensure recognition laws attempt to account for most or all professions practicing within a single state.



Universal Licensure Recognition v. Interstate Compacts: A Side- By-Side Comparison

As states seek ways to improve occupational licensure portability for out-of-state professionals, universal licensure recognition laws have gained popularity. Eighteen states have either implemented new or amended existing license portability policies that may be identified under the universal licensure recognition model. The model generally sets less restrictive and more uniform licensure portability standards across most or all licensed occupations within a state.

Universal licensure recognition laws do not provide true reciprocity—instantaneous recognition to another state's license. They may still require an application process and give discretion by a state's licensing board to determine eligibility. But they have the intended effect of lowering the barrier to license portability and reducing time to licensure. States also benefit from the ability to act unilaterally in a short period of time to establish streamlined pathways to licensure.

This table shows some similarities between universal licensure recognition laws and interstate licensure compacts, while highlighting key differences.

CRITERIA	UNIVERSAL LICENSURE RECOGNITION LAWS	INTERSTATE LICENSURE COMPACTS
Requires practitioners to abide by the scope of practice of the state in which they are practicing	✓	✓
Allows for expeditious interstate movement of practitioners during emergencies	✓	✓
Reduces barriers for out-of-state practitioners aiming to practice within a state	✓ ¹	✓
Reduces barriers for in-state practitioners intending to practice in other state(s)	✗	✓
Allows military spouses to maintain a single home state license for the duration of the service member's active duty, regardless of relocations, without submitting a separate application to each state's licensure board	✗	✓ ²
Allows practitioners to work in multiple states, both in person and via telehealth/telework, without submitting a separate application to each state's licensure board, requiring verification of the current license or obtaining a new background check	✗	✓
Brings together a coalition of states to establish consistent and enforceable interstate licensure standards tailored to the public protection requirements of a given profession	✗	✓
Enhances public protection by creating a multistate database of licensure information to facilitate collaboration on license verification and investigations of potential misconduct	✗	✓
Allows multistate practice without requiring practitioners to change state of residence	Sometimes ¹	✓ ³
Allows practitioners to work in multiple states while adhering to only one state's continuing education requirements and license renewal schedule	✗	✓

¹ Some states—such as Arizona and Iowa—have universal licensure recognition laws that require practitioners to reside in the state, while others—such as Colorado and Idaho—do not.

² This is true only if practitioners relocate to a compact member state. License verification is based on practitioners complying with compact criteria for privilege to practice in another member state.

³ This is applicable when practitioners travel from one compact member state to another.

Adoption of Universal Licensure Recognition Laws and Interstate Licensure Compacts

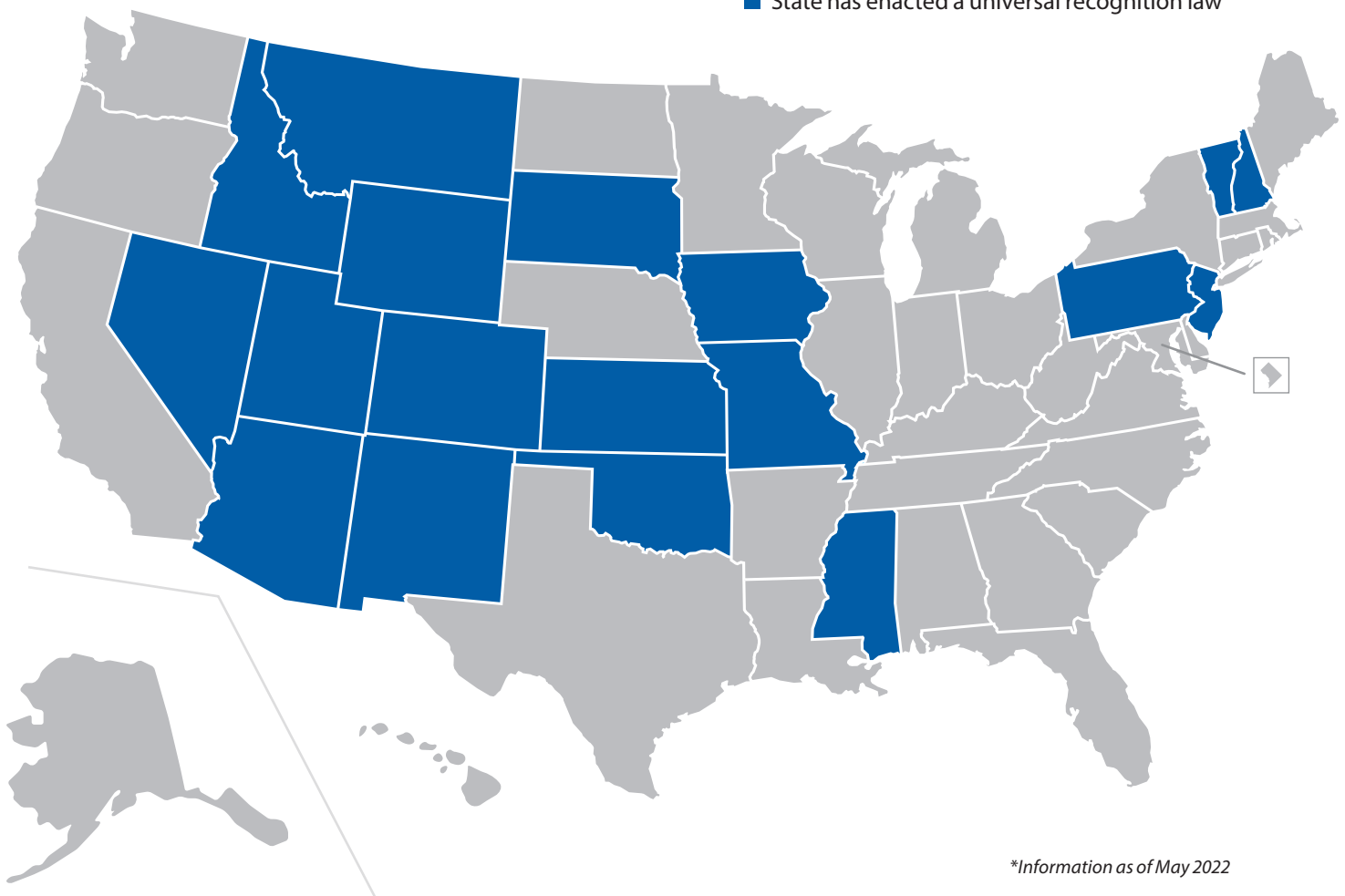
The Council of State Governments (CSG) identified 18 states that have enacted some type of universal recognition policy for out-of-state licensed professionals.

Forty-three states, two U.S. territories and the District of Columbia have enacted at least one interstate licensure compact and 36 states

have enacted at least three interstate licensure compacts. These statutorily enacted agreements allowing licensees to practice across state lines involve over 220 separate pieces of legislation and include compacts in the fields of physical therapy, nursing, emergency medical services, psychology, occupational therapy and more.

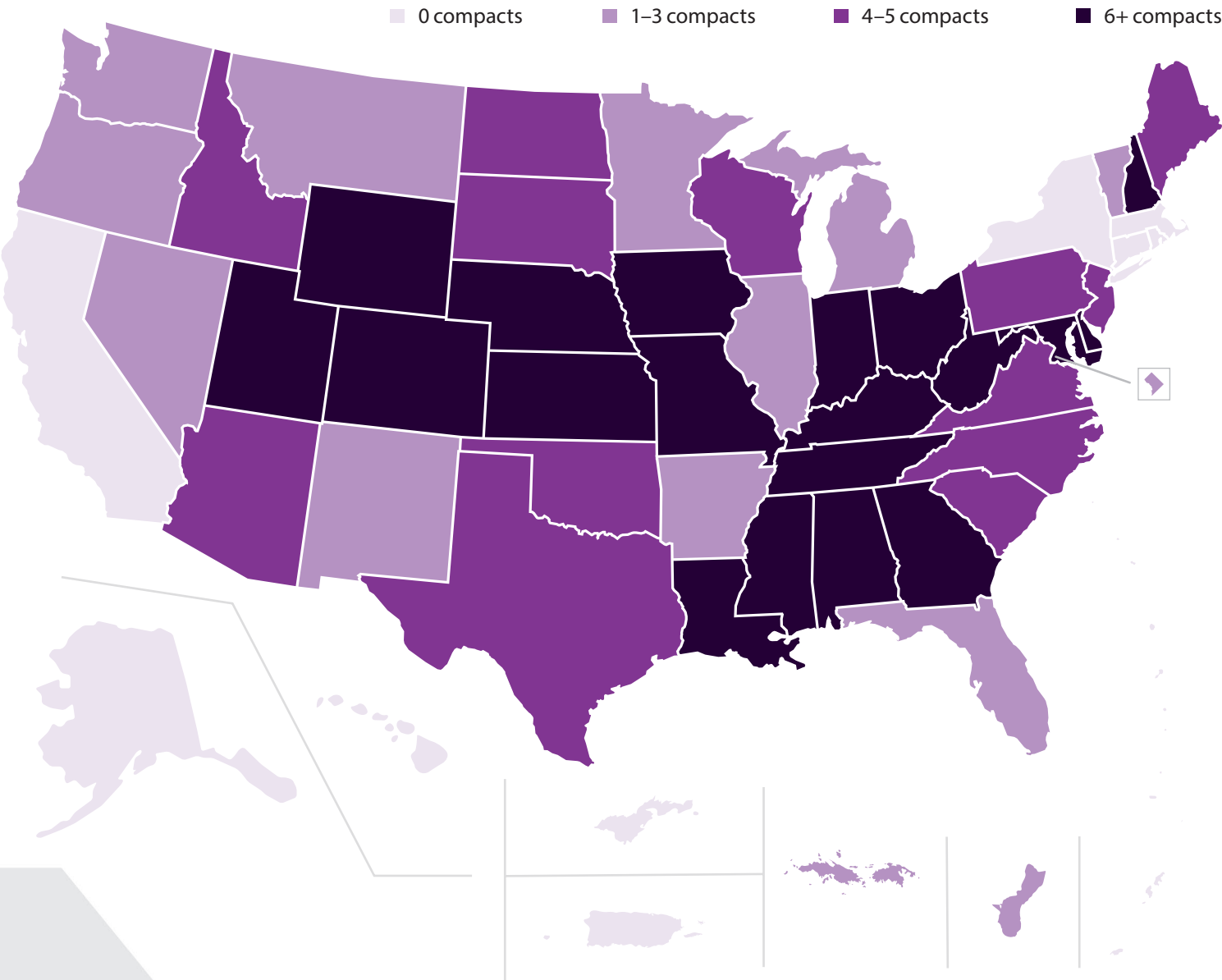
Universal Licensure Recognition Laws

■ State has enacted a universal recognition law



**Information as of May 2022*

Interstate Licensure Compacts



*Information as of May 2022

State and U.S. Territory Membership in Interstate Licensure Compacts

Navigating various state licensing requirements, rules, regulations and fee structures can present challenges for professionals. Interstate licensure compacts create reciprocal professional licensing practices among states while ensuring the quality and safety of services and safe-guarding state sovereignty.

NLC

Nurse Licensure Compact

IMLC

Interstate Medical Licensure Compact

PT

Physical Therapy Compact

EMS

Emergency Medical Services Compact

PSYPACT

Psychology Interjurisdictional Compact

ASLP

Audiology and Speech-Language Pathology Compact

OT

Occupational Therapy Compact

CC

Counseling Compact

APRN

Advanced Practice Registered Nurse Compact

PA*

Physician Assistants/Associates Compact

*First legislative enactments are expected in 2023.

STATE	NLC	IMLC	PT	EMS	PSYPACT	ASLP	OT	CC	APRN	TOTALS
ALABAMA										8
ALASKA										0
ARIZONA										5
ARKANSAS										3
CALIFORNIA										0
COLORADO										8
CONNECTICUT										0
DELAWARE										6
FLORIDA										2
GEORGIA										8
HAWAII										0
IDAHO										5
ILLINOIS										2
INDIANA										6
IOWA										6
KANSAS										6
KENTUCKY										7
LOUISIANA										5
MAINE										5
MARYLAND										7
MASSACHUSETTS										0
MICHIGAN										1
MINNESOTA										2
MISSISSIPPI										6
MISSOURI										5
MONTANA										3
NEBRASKA										8
NEVADA										2
NEW HAMPSHIRE										6
NEW JERSEY										4
NEW MEXICO										1
NEW YORK										0
NORTH CAROLINA										5
NORTH DAKOTA										5
OHIO										6
OKLAHOMA										5
OREGON										1
PENNSYLVANIA										4
RHODE ISLAND										0
SOUTH CAROLINA										5
SOUTH DAKOTA										4
TENNESSEE										8
TEXAS										5
UTAH										9
VERMONT										2
VIRGINIA										5
WASHINGTON										4
WEST VIRGINIA										8
WISCONSIN										5
WYOMING										5
AMERICAN SAMOA										0
DIST. OF COLUMBIA										3
GUAM										2
CNMI										0
PUERTO RICO										0
US VIRGIN ISLANDS										1
	39	37	34	31	31	22	21	14	3	222

*Information as of May 2022

Universal Licensure Recognition Laws

While states are using universal licensure recognition laws as part of their toolkits to increase license mobility, they are also exempting interstate licensure compacts from the provisions of the universal recognition policy.

Interstate licensure compacts are developed in a negotiated process in which universal requirements for compact participation are identified by practitioners and industry experts. By joining a compact, states are agreeing to the requirements for participation as listed in the compact. Universal licensure recognition policies that do not include a provision excluding interstate licensure compacts may come into conflict with requirements for participation in a compact.

Interstate licensure compacts and universal licensure recognition laws can coexist without conflict or redundancy as long as provisions to exclude compacts are inserted into the universal licensure recognition bills. Enhancing the ability of practitioners to engage in interstate practice requires more than a one-size-fits-all approach. States should account for industry-tailored reciprocity mechanisms such as interstate licensure compacts when crafting universal licensure recognition laws.

EXAMPLE STATUTORY LANGUAGE EXEMPTION INTERSTATE LICENSURE COMPACTS FROM UNIVERSAL LICENSURE RECOGNITION LAWS

ARIZONA STAT. 32-4302(E), (F)

F. A license or certificate issued pursuant to this section is valid only in this state and does not make the person eligible to be part of an interstate compact. A regulating entity under this title may determine eligibility for an applicant to be licensed or certified under this section if the applicant is not part of an interstate compact.

COLORADO HB 20-1326 (2020) SEC. 4(C)

(c) An applicant is not entitled to licensure, certification, registration, or enrollment pursuant to this subsection (3) if approving the licensure, certification, registration, or enrollment would violate an existing compact or reciprocity agreement [...]

IDAHO STAT. 67-9409(7)

(7) This section shall not restrict a person who is a member of a profession or occupation covered by an applicable interstate licensure compact or applicable reciprocity agreement from seeking licensure pursuant to this section. In such a situation, a person may apply for universal licensure under this section or may apply for licensure pursuant to the terms of the applicable licensure compact or reciprocity agreement. A licensing authority may promulgate applicable rules if necessary to implement the provisions of this section.

INDIANA CODE 25-1-17-8(F)

[note: universal recognition for military spouses only]

(f) This section does not apply to a license that is established by or recognized through an interstate compact, a reciprocity agreement, or a comity agreement that is established by a board or a law.

IOWA STAT. 272C.12(3)

3. This section does not apply to any of the following:
b. Criteria for a license, certificate, or registration that is established by an interstate compact.

NEW HAMPSHIRE STAT. 332-G:14 (I)

I. Any board or commission regulating an occupation or profession which is a member of an interstate licensure compact, or which has, in statute or by administrative rules, a procedure for reciprocity or temporary licensure for individuals from other states, need not comply with this section for any license or certificate issued by the board or commission.

GEORGIA HB 773 (2019-2020) [NOTE: BILL FAILED]

(f) This Code section shall not apply to:

- (1) Criteria for a license that is issued pursuant to a license of eligibility that is established by an interstate compact [...]
- (g) A license issued pursuant to this Code section shall be valid only in this state and shall not make the licensed individual eligible to be part of an interstate compact. A regulating entity in this state may determine eligibility for an applicant to be licensed pursuant to this Code section if the applicant is not part of an interstate compact.

MISSOURI STAT. 324.009(10), (11)

10. The provisions of this section shall not apply to an oversight body that has entered into a licensing compact with another state for the regulation of practice under the oversight body's jurisdiction. The provisions of this section shall not be construed to alter the authority granted by, or any requirements promulgated pursuant to, any interjurisdictional or interstate compacts adopted by Missouri statute or any reciprocity agreements with other states in effect on August 28, 2018, and whenever possible this section shall be interpreted so as to imply no conflict between it and any compact, or any reciprocity agreements with other states in effect on August 28, 2018
11. Notwithstanding any other provision of law, a license issued under this section shall be valid only in this state and shall not make a licensee eligible to be part of an interstate compact. An applicant who is licensed in another state pursuant to an interstate compact shall not be eligible for licensure by an oversight body under the provisions of this section.

UTAH CODE § 58-1-302(5)

In accordance with Section 58-1-107, licensure endorsement provisions in this section are subject to and may be supplemented or altered by licensure endorsement provisions or multi-state licensure compacts in specific chapters of this title.

The Growing Importance of Professional License Portability

In an increasingly interconnected world, professional license portability has gained even greater significance. Accordingly, both the Biden and Trump administrations issued executive orders calling for agencies to reduce barriers for mobile professionals. President Biden's [Executive Order](#) on Promoting Competition in the American Economy, dated July 9, 2021, acknowledges that "some overly restrictive occupational licensing requirements can impede workers' ability to find jobs and move between States," and directs the Federal Trade Commission to consider exercising its rulemaking authority to reduce "unfair occupational licensing restrictions."

President Trump's earlier [Executive Order](#) on Increasing Economic and Geographic Mobility, dated Dec. 14, 2020, established the policy of the federal government to "support occupational regulation reform throughout the Nation," and provided six guiding principles for reducing licensure barriers. Two of these principles

are directly aligned with the purposes of all licensure compacts:

- States should issue an occupational license to an individual holding an equivalent license from another state.
- States should provide special licensure accommodations for relocating military spouses — some but not all universal licensure recognition laws address military spouses.

Further underscoring the federal government's commitment to reducing interstate licensure burdens, the Department of Defense has entered into a [cooperative agreement](#) with The Council of State Governments to develop licensure compacts for several additional professions, with the goal of improving interstate license portability for military spouses and the general public.

Perhaps the most crucial benefit shared by interstate licensure compacts and universal licensure recognition laws is increasing access to health care. During the COVID-19 pandemic, many states and localities experienced shortages of practitioners due to high rates of infections and resulting quarantine requirements for health care personnel. State policies that support licensure mobility may assist states in their responses to emergencies like COVID-19. For example, the Nurse Licensure Compact is experiencing an increase in utilization during the pandemic, as nurses based in locations with lower infection rates travel across state lines to assist in virus hotspots.

With a holistic approach that includes licensure compact membership for eligible professions and universal recognition policies for professions without compacts, states can facilitate smooth interstate mobility for licensed professionals, shoring up state health care workforces while also promoting competition and supporting military spouses.



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