



NATIONAL CENTER FOR INTERSTATE COMPACTS

# Interstate Licensure Compacts and Universal License Recognition Laws

FACT SHEET



## Universal Recognition vs. Interstate Compact

As states seek ways to improve occupational licensure portability for out-of-state workers, universal licensure recognition laws have gained popularity. Since 2019, eight states have either implemented new or reworked existing license portability policies that may be defined 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 the state.

While these universal license recognition laws do not provide for true reciprocity – instantaneous recognition of another state’s license – and may still require an application process and allow for some discretion by the licensing board in license decisions, they have the intended effect of lowering the threshold for license portability in a state and reducing time to licensure. States also may particularly benefit from the policy’s ability to be enacted unilaterally over a short period of time and the opportunity to set alternative pathways to licensure.

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

CRITERIA	UNIVERSAL RECOGNITION	INTERSTATE COMPACT
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 your state	✓*	✓
Reduces barriers for in-state practitioners aiming to practice in multiple states	✗	✓
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	✗	✓ <sup>1</sup>
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 uniform and enforceable interstate licensure standards that are narrowly tailored to the public protection requirements of a specific profession	✗	✓
Enhances public protection by creating a multi-state database of licensure information to facilitate collaboration on license verification and investigations of potential misconduct	✗	✓
Allows multistate practice without requiring the practitioner to change state of residence	Sometimes*	✓ <sup>2</sup>

\* Some states’ universal recognition laws, such as those in Iowa and Arizona, require the practitioner to reside in the state while others, such as Colorado’s and Idaho’s, do not.

<sup>1</sup> If relocating to a compact member state. Verification based on practitioner complying with compact criteria for privilege to practice in another member state.

<sup>2</sup> Applicable when practitioner travels from one compact member state to another compact member state.

## Introduction

In recent years, states have worked to reduce barriers to interstate mobility for licensed professionals through **interstate licensure compacts**, or statutorily enacted agreements among states allowing licensees to practice across state lines, and **universal license recognition laws** in which a single state determines its unique process to grant a license by endorsement to a license holder from another state or

territory. These policies help to solve similar problems, but there are several 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 recognition laws attempt to account for most or all professions a state regulates but only with regard to practice within that state’s borders.

## Adoption of Interstate Licensure Compacts and Universal Recognition Laws

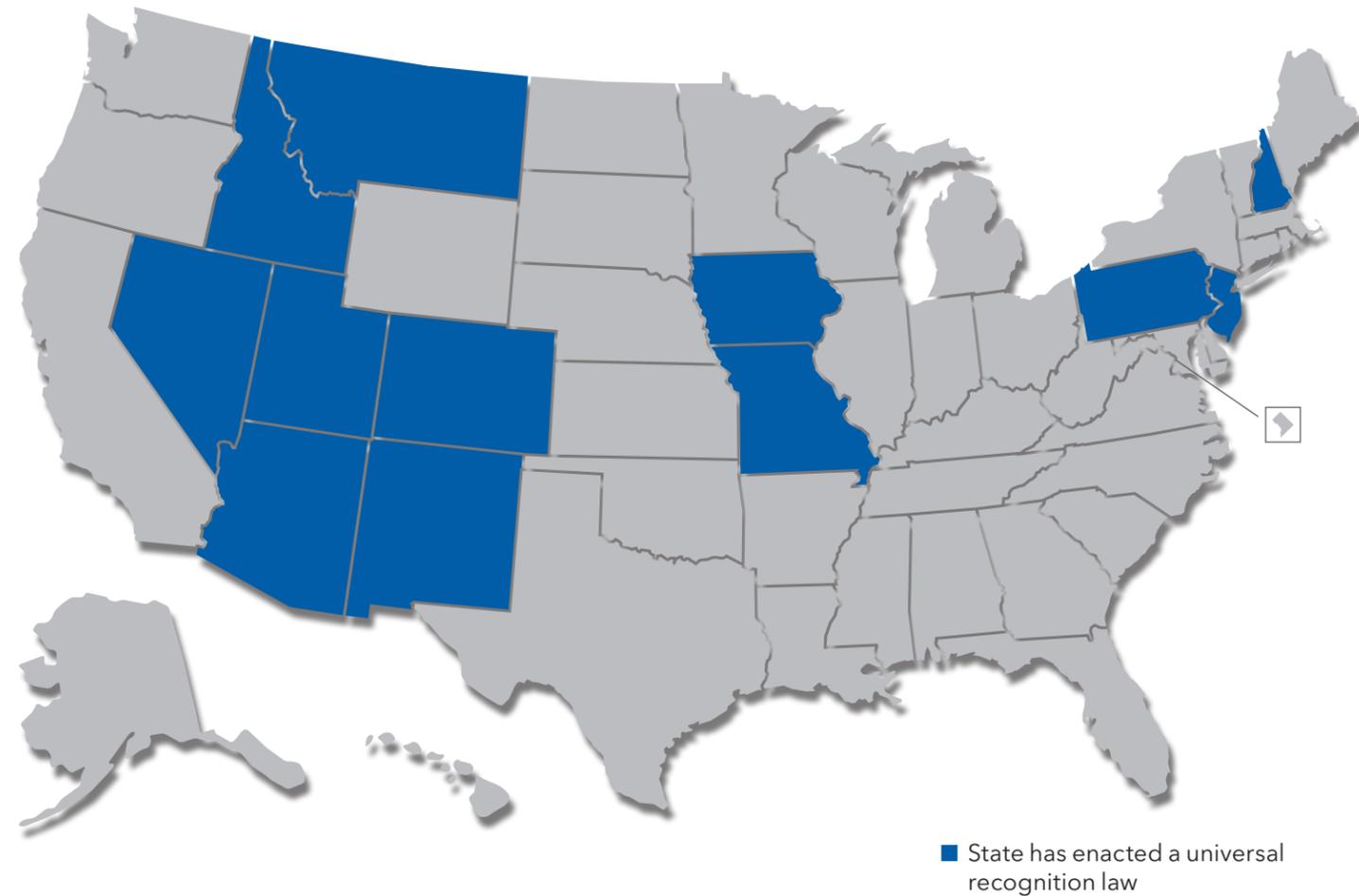
The Council of State Governments (CSG) identified 12 states that have enacted some type of universal recognition policy for out-of-state licensed workers.

Forty-two states have enacted at least one interstate licensure compact, and 29 states belong to at least three interstate licensure compacts. These currently active statutory enacted agreements among states allowing licensees to practice across state lines

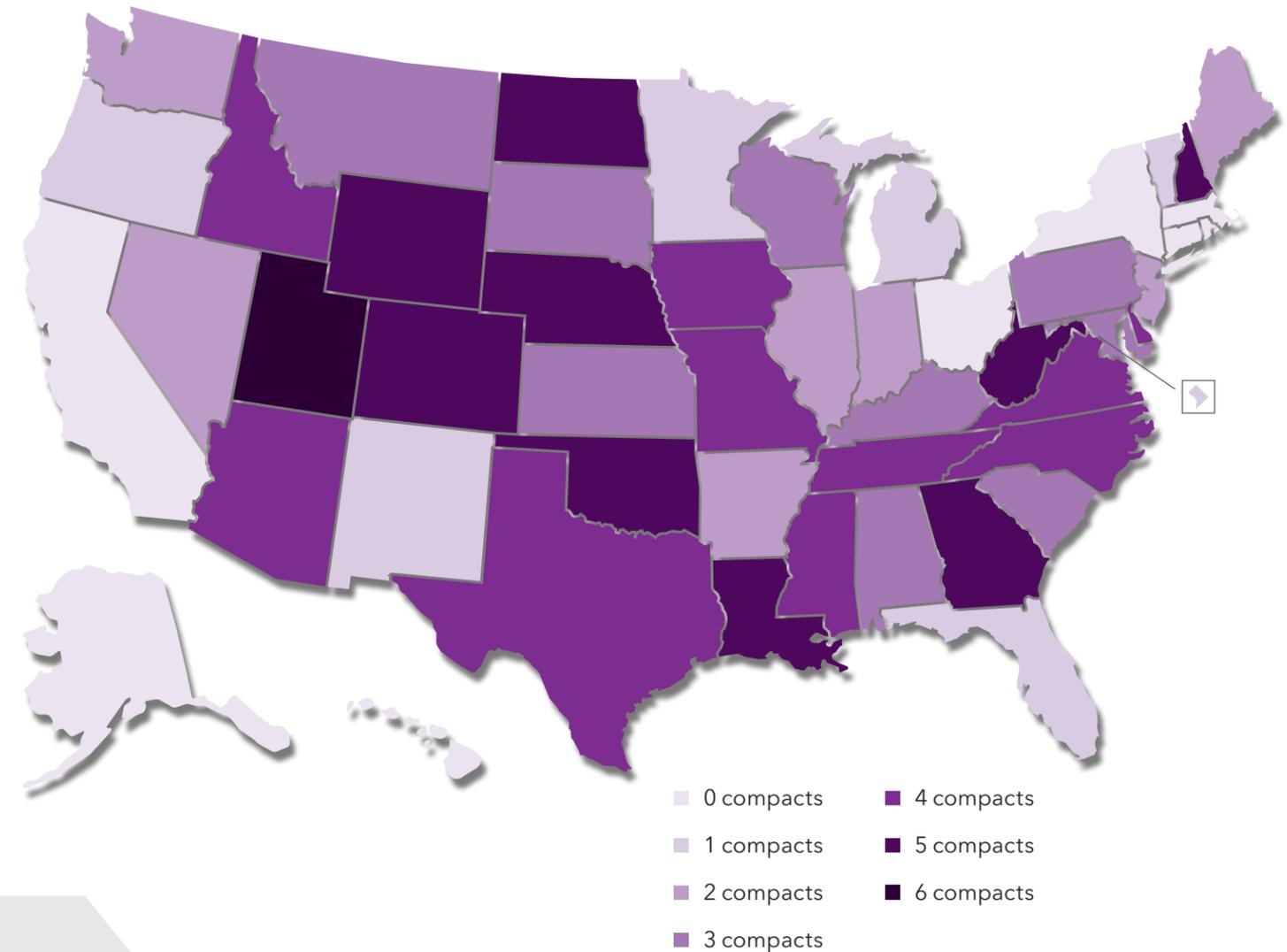
involve 138 separate pieces of legislation and include compacts in the fields of physical therapy, nursing, emergency medical services, psychology, occupational therapy and more.

Every state and territory has enacted at least two dozen interstate compacts in areas outside of occupational licensure, including insurance regulation, corrections, foster care, and education.

### Universal Recognition Laws



### Active Interstate Licensure Compacts



## State and U.S. Territory Membership to Interstate Licensure Compacts

Navigating the various state licensing requirements, rules, regulations and fee structures can present challenges for workers. To address these challenges, states and professions have turned to occupational licensure interstate compacts. These compacts create reciprocal professional licensing practices between states, while ensuring the quality and safety of services and safeguarding state sovereignty. To date, over 40 states and territories have adopted at least one of the following occupational licensure compacts:<sup>†</sup>

- PT**  
Physical Therapy Compact
- IMLC**  
Interstate Medical Licensure Compact
- ENLC**  
Enhanced Nurse Licensure Compact
- EMS**  
Emergency Medical Services Compact
- PSYPACT**  
Psychology Interjurisdictional Compact
- APRN**  
Advanced Practice Nursing Compact
- ASLP**  
Audiology And Speech-Language Pathology Compact
- OT**  
Occupational Therapy Licensure Compact\*
- CC**  
Counseling Compact\*

\*First enactments expected in 2021

<sup>†</sup> Every state and territory has enacted at least two dozen interstate compacts in areas outside of occupational licensure, including insurance regulation, corrections, foster care, and education.

STATE	PT	IMLC	ENLC	EMS	PSYPACT	APRN	ASLP	OT*	CC*	TOTALS
ALABAMA										3
ALASKA										0
ARIZONA										4
ARKANAS										2
CALIFORNIA										0
COLORADO										5
CONNECTICUT										0
DELAWARE										4
FLORIDA										1
GEORGIA										5
HAWAII										0
IDAHO										4
ILLINOIS										2
INDIANA										2
IOWA										4
KANSAS										3
KENTUCKY										3
LOUISIANA										5
MAINE										2
MARYLAND										3
MASSACHUSETTS										0
MICHIGAN										1
MINNESOTA										1
MISSISSIPPI										4
MISSOURI										4
MONTANA										3
NEBRASKA										5
NEVADA										2
NEW HAMPSHIRE										5
NEW JERSEY										2
NEW MEXICO										1
NEW YORK										0
NORTH CAROLINA										4
NORTH DAKOTA										5
OHIO										0
OKLAHOMA										5
OREGON										1
PENNSYLVANIA										3
RHODE ISLAND										0
SOUTH CAROLINA										3
SOUTH DAKOTA										3
TENNESSEE										4
TEXAS										4
UTAH										6
VERMONT										1
VIRGINIA										4
WASHINGTON										2
WEST VIRGINIA										5
WISCONSIN										3
WYOMING										5
AMERICAN SAMOA										0
DIST. OF COLUMBIA										1
GUAM										0
CNMI										0
PUERTO RICO										0
US VIRGIN ISLANDS										0
	29	30	34	21	15	3	6	0*	0*	138

## Preventing Conflicts Through Exemptions for Compacts

While states are using universal recognition laws as part of their toolkits to increase license mobility, they are also exempting interstate occupational licensure compacts from the provisions of the universal recognition policy. Policymakers understand the importance of interstate compacts and their tailored functionality for the professions they were designed for.

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

Licensure compacts and universal recognition statutes can coexist without conflict or redundancy as long as provisions to exclude interstate compacts are inserted into the universal 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 compacts when crafting universal recognition laws.

## EXAMPLE LANGUAGE EXEMPTING COMPACTS FROM UNIVERSAL 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.

### 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

### 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 multistate licensure compacts in specific chapters of this title.

### 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.

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.

**For More Information**

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