



ALLIANCE *for*
CONNECTED CARE

February 28, 2014

Dr. Hank Chaudhry
President/CEO
Federation of State Medical Boards (FSMB)
1300 Connecticut Avenue, N.W.
Suite 500
Washington, D.C. 20036

RE: Draft Interstate Medical Licensure Compact

We commend the Federation of State Medical Board's (FSMB) work to address the important issue of interstate licensure. The Alliance for Connected Care (the "Alliance") is pleased to have the opportunity to submit comments on the draft *Interstate Medical Licensure Compact* (the "Compact").

The Alliance for Connected Care is a 501(c)(6) organization that was formed to create a statutory and regulatory environment in which medical providers are permitted to deliver, and be adequately compensated for, providing safe, high-quality care using Connected Care at his or her discretion, regardless of care delivery location or technological modality. Our members are leading companies from across the health care and technology spectrum, representing insurers, retail pharmacies, technology and telecommunications companies, and health care entrepreneurs, including Verizon, WellPoint, CVS, Walgreens, Teladoc, HealthSpot, Doctor on Demand, Welch Allyn, Cardinal Health, Care Innovations, and MDLive.

We have seen first-hand the administrative burdens associated with medical licensure in multiple states, and the barriers they can pose to the practice of medicine, and to patients' access to care in this age of advanced technology. Our members work every day with physicians who remain frustrated by the barriers to interstate licensure. This is particularly true for physicians who practice telemedicine and who have patients residing outside of their home state.

To address these concerns, the Alliance supports the development of an interstate compact that would create a system of reciprocity, specifically an agreement passed by state legislatures and governors that recognizes the medical licenses issued in other states that have also passed the agreement. We believe it is possible to design such a system while still protecting consumers and allowing medical boards to enforce their regulations and collect operating fees. Reciprocity would greatly streamline the practice of medicine across state lines while ensuring that physicians are held to the appropriate state-established standards.

FSMB is a critical component of the solution to the barriers of the current system of licensure and recommend several additions to strengthen the draft Compact.

1. If you maintain the direction of creating a “Commission,” we recommend that FSMB more clearly demonstrate the value that will be added as a result of its establishment. This includes providing additional detail on the Commission’s role in facilitating expedited licensure determinations; the streamlined communication channels between the home state, the Commission, and other member states; and the timeframe for expedited licensure.
2. If the intent of the Compact is to ensure rapid turnaround for licensure applications through the Commission, we recommend that FSMB include a timeframe in the document that specifies the length of time estimated for end-to-end processing. We believe this will help achieve greater support from stakeholders.
3. The Compact is a policy document, but in order for the vision encompassed in the document to become reality, there must be interoperable information technology (IT) systems in place. We believe the document would be strengthened by some reference to the systems and workflows that will be utilized by the Commission to expedite the licensure process.
4. We recommend that FSMB clearly outline the eligibility requirements physicians will have to satisfy to be eligible to participate in the expedited process in the Compact. As currently written, the eligibility requirements are included in the definition of “physician.” We recommend that FSMB create a separate section with these requirements to provide as much clarity as possible.

* * *

In closing, we appreciate the opportunity to submit our comments on the draft Compact and would welcome the opportunity to continue to work with you on the important goal of easing the burden of interstate licensure on physicians who want to treat patients. If you have any questions or need further information, please do not hesitate to contact us. Thank you for your consideration.

Sincerely,



Krista Drobac
Executive Director
Alliance for Connected Care