



Medicare Clarifies Recognition of Interstate License Compact Pathways

MLN Matters Number: SE20008 Revised

Related Change Request (CR) Number: N/A

Article Release Date: September 16, 2021

Effective Date: N/A

Related CR Transmittal Number: N/A

Implementation Date: N/A

Note: We revised this Article to clarify language about licenses that certain providers get through interstate licensing compact pathways. You'll find substantive content updates in dark red font on pages 1 and 2.

Provider Types Affected

This MLN Matters Article is for physicians and non-physician practitioners (NPPs) who get licenses through the interstate licensing compact pathways and wish to bill Medicare Administrative Contractors (MACs) for services they provide to Medicare patients.

What You Need to Know

This Article clarifies CMS' recognition of licenses through interstate license compact pathways as valid and full licenses for purposes of meeting federal license requirements.

Background

We are aware of a new trend in medicine involving interstate license compacts. An interstate license compact offers a new, voluntary, and faster pathway to licensure for qualified physicians and NPPs who wish to practice in multiple states.

All license compacts aren't the same. Physician compacts streamline the licensure process for physicians who want to practice in multiple states. However, if a physician meets all requirements, each state will still issue a separate license from each state the physician intends to practice. We'll continue to rely on the license the state medical board issues to confirm compliance with our federal license requirements.

Some NPP compacts allow the NPP to work in a compact member state, other than their home state, without going through the normal licensure process in the remote state. NPPs working under such a compact must meet both the licensure requirements outlined in the primary state of residence and those established by the compact laws of the interstate compact states.

We are aware of the Physician, Physical Therapy, Occupational Therapy, Speech Language Therapy, and Psychology interstate license compacts, but more may be underway.

For physicians and NPPs, we'll treat **licenses through** the interstate license compact **pathway** as valid, full licenses for the purposes of meeting our federal license requirements. Your MACs will accept CMS-855 enrollment applications from providers reporting a **license through** the interstate license compact **pathway**.

Your MAC first will attempt to verify the **license through** the interstate license compact **pathway** using the state licensing board website **or another available verification source**. If unsuccessful, the MAC will request documentation from you to validate the interstate license compact information.

MACs will re-open any previously denied enrollment applications reporting a **license through** the interstate license compact **pathway** and continue processing. We'll base the effective date of billing on the receipt date of the original application.

More Information

See [Chapter 10, Section 10.2.3 of the Program Integrity Manual](#) regarding verification of license and certification requirements for enrollment.

For more information, [find your MAC's website](#).

Document History

Date of Change	Description
September 16, 2021	We revised this Article to clarify language about licenses that certain providers get through interstate licensing compact pathways. You'll find substantive content updates in dark red font on pages 1 and 2.
May 5, 2020	Initial article released.

Disclaimer: Paid for by the Department of Health & Human Services. This article was prepared as a service to the public and is not intended to grant rights or impose obligations. This article may contain references or links to statutes, regulations, or other policy materials. The information provided is only intended to be a general summary. It is not intended to take the place of either the written law or regulations. We encourage readers to review the specific statutes, regulations and other interpretive materials for a full and accurate statement of their contents. CPT only copyright 2019 American Medical Association. All rights reserved.

Copyright © 2013-2019, the American Hospital Association, Chicago, Illinois. Reproduced by CMS with permission. No portion of the AHA copyrighted materials contained within this publication may be copied without the express written consent of the AHA. AHA copyrighted materials including the UB-04 codes and descriptions may not be removed, copied, or utilized within any software, product, service, solution or derivative work without the written consent of the AHA. If an entity wishes to utilize any AHA materials, please contact the AHA at 312-893-6816. Making copies or utilizing the content of the UB-04 Manual, including the codes and/or descriptions, for internal purposes, resale and/or to be used in any product or publication; creating any modified or derivative work of the UB-04 Manual and/or codes and descriptions; and/or making any commercial use of UB-04 Manual or any portion thereof, including the codes and/or descriptions, is only authorized with an express license from the American Hospital Association. To

license the electronic data file of UB-04 Data Specifications, contact Tim Carlson at (312) 893-6816. You may also contact us at ub04@healthforum.com

The American Hospital Association (the "AHA") has not reviewed, and is not responsible for, the completeness or accuracy of any information contained in this material, nor was the AHA or any of its affiliates, involved in the preparation of this material, or the analysis of information provided in the material. The views and/or positions presented in the material do not necessarily represent the views of the AHA. CMS and its products and services are not endorsed by the AHA or any of its affiliates.