

Health Care Compacts

Presentation to the Senate Committee on Health Policy

Wendy Scott, Staff Director for Health and Human Services



OPPAGA

Office of Program Policy Analysis and Government Accountability

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Project Scope and Methodology

As directed by the Legislature, OPPAGA examined the advantages and disadvantages of participation in health care compacts and answered three questions.

1. How does Florida reduce barriers for out-of-state practitioners to become licensed to practice in the state?
2. What are the advantages and disadvantages of joining health care compacts?
3. What are key considerations when contemplating participation in health care compacts?

Methodology

Information
and Data
Requests

Assessment of
Stakeholder
Perspectives

Literature
Review

Compact
Document
Review

Practice Avenues



Florida offers three options for licensed out-of-state practitioners to provide services in Florida



Licensure by Endorsement



Telehealth Registration

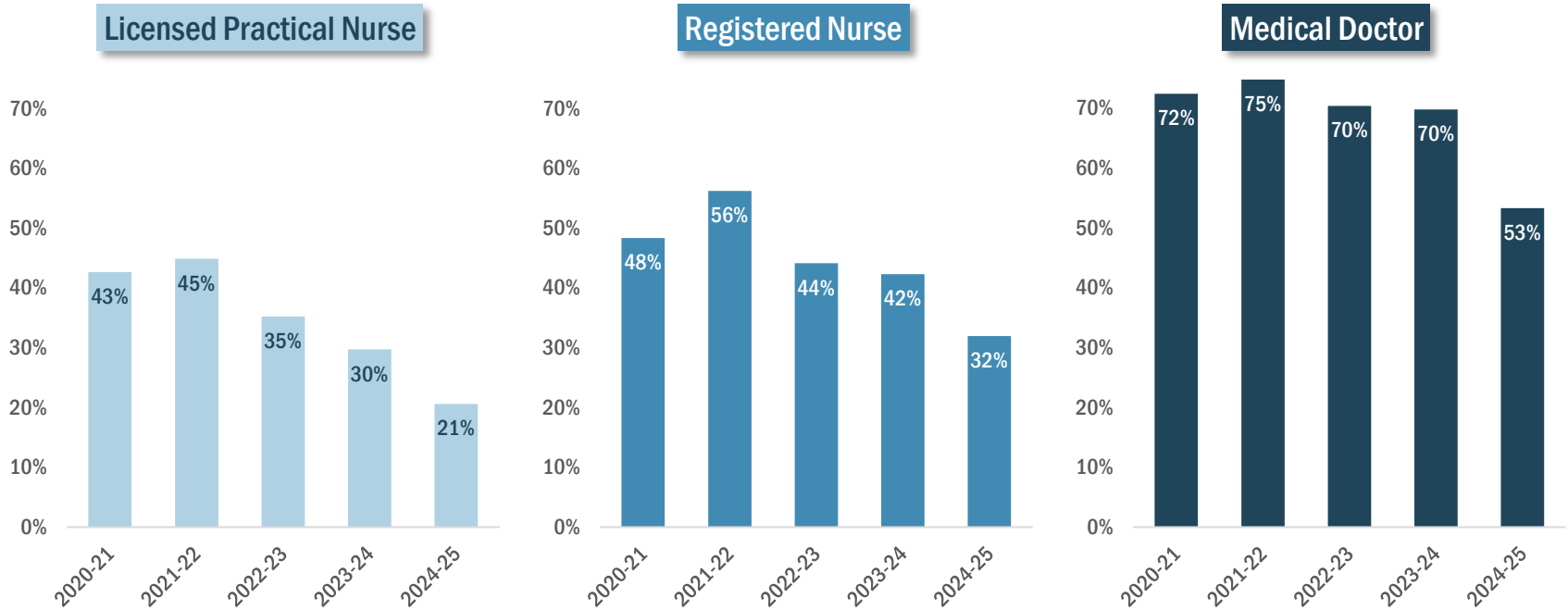


Licensure by Compact

Licensure by Endorsement



The percentage of out-of-state practitioners licensed by endorsement in each fiscal year has generally declined



Source: OPPAGA analysis of data from the Florida Department of Health.

Telehealth Registration



New telehealth registrations for out-of-state practitioners have remained relatively stable; more out-of-state physicians than nurses are registered to provide telehealth in Florida

- Section 456.47(4), *Florida Statutes*, authorizes practitioners located and licensed in other states to register with DOH to perform telehealth services for patients in Florida

Telehealth Profession	Fiscal Year				
	2020-21	2021-22	2022-23	2023-24	2024-25
Licensed Practical Nurse	1	1	3	1	0
Registered Nurse	9	41	16	25	23
Medical Doctor	1,225	2,705	1,282	1,042	1,054
Osteopathic Physician	115	254	172	172	149
Total New Registrations	1,350	3,001	1,473	1,240	1,226

Source: OPPAGA analysis of data from the Florida Department of Health.

Licensure by Compact



Health care compacts are legislatively enacted agreements between states to mutually recognize each state's practitioner licenses

State officials
form an advisory
body

A drafting team
develops model
legislation for
feedback

When model
legislation is
finalized, states
may adopt it

When a pre-set
number of states
adopt model
legislation,
commissions
form and
administer the
compact

States
implement
compact
legislation

States process
compact
applications

Florida Landscape



There are 17 health care compacts; Florida has passed legislation to join six and three are active



Active in Florida



2018: Nurse Licensure



2023: Psychology Interjurisdictional



2024: Interstate Medical Licensure



Not Yet Active in Florida



Counseling



Audiology and Speech-Language Pathology



Physical Therapy

Health Care Compacts Florida Has Not Joined



Advanced Practice Registered Nurse



Athletic Trainers



Dentist and Dental Hygienist



Dietician Licensure



Emergency Medical Services



Interstate Compact for School Psychologists



Interstate Massage Therapy



Occupational Therapy



Physician Assistant Licensure



Respiratory Care



Social Work Licensure

Number of Compacts

Color	Number of Compacts
Lightest Blue	0
Light Blue	1 - 4
Medium Blue	5 - 8
Darkest Blue	9 - 11

Scale: 0 100 200 300 400 500 600 700 Miles

States and Compact Counts (from top left to bottom right):

- Washington: 10
- Oregon: 1
- California: 0
- Nevada: 4
- Arizona: 6
- New Mexico: 1
- Alaska: 0
- Idaho: 6
- Montana: 6
- Wyoming: 7
- North Dakota: 9
- South Dakota: 11
- Nebraska: 9
- Minnesota: 2
- Wisconsin: 9
- Illinois: 2
- Michigan: 2
- Indiana: 8
- Ohio: 7
- Pennsylvania: 5
- Delaware: 10
- Maryland: 10
- Virginia: 9
- North Carolina: 6
- South Carolina: 6
- Georgia: 8
- Florida: 5*
- Texas: 5
- Louisiana: 7
- Mississippi: 8
- Alabama: 8
- West Virginia: 10
- Kentucky: 9
- Tennessee: 9
- Arkansas: 8
- Oklahoma: 8
- Missouri: 8
- Iowa: 8
- Illinois: 2
- Indiana: 8
- Ohio: 7
- Pennsylvania: 5
- Delaware: 10
- Maryland: 10
- Virginia: 9
- North Carolina: 6
- South Carolina: 6
- Georgia: 8
- Florida: 5*

*Note: Florida has 5 compacts, marked with an asterisk.

Source: OPPAGA analysis of data from Bogulski, Cari A., et al. "Trends in U.S. State and Territory Participation in Interstate Healthcare Licensure Compacts (2015-2024)." *Journal of Medical Regulation* 111.1 (2025): 8-25. <https://doi.org/10.30770/2572-1852-111.1.8>

Advantages and Disadvantages of Compacts



Health care compacts have reported advantages for the state, practitioners, and the public; some may have disadvantages



Compact Advantages

- Facilitates licensure and disciplinary data sharing
- Can expedite practitioner supply during certain circumstances, such as natural disasters
- Eases application requirements for practitioners
- Benefits military families
- Allows for continuity of care



Compact Disadvantages

- Cost and operational challenges
- May alter state scope of practice

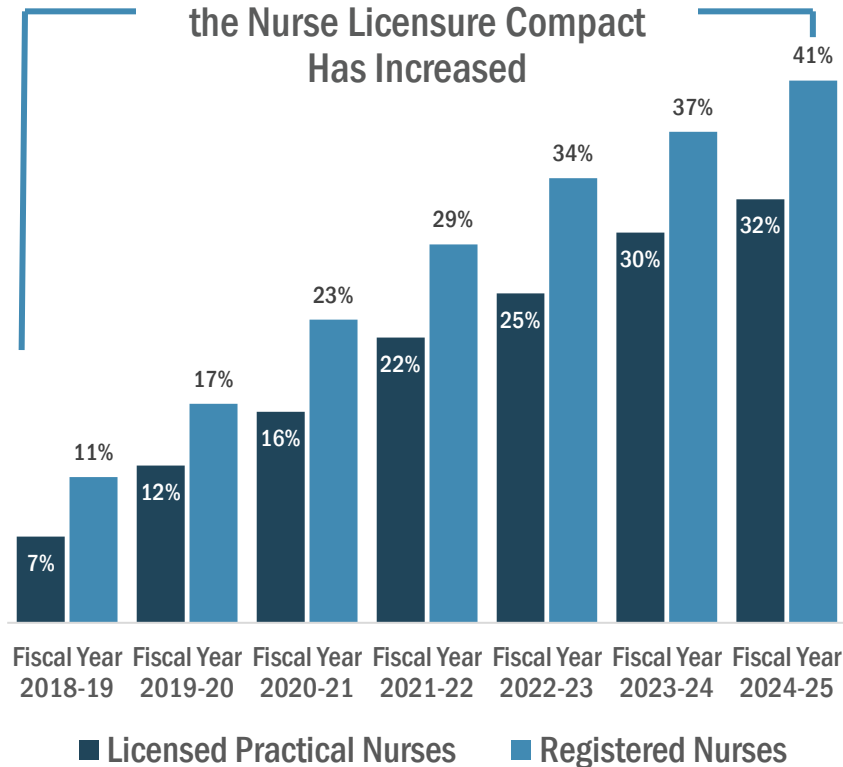
OPPAGA did not find reliable evidence to support claims that health care compacts reduce workforce shortages and increase access to providers

Nurse and Psychologist Compact Participation



Participation in health care compacts by Florida licensed practitioners varies; lack of reporting requirements results in inability to determine number of compact practitioners practicing in compact states

Florida Nurses' Participation in the Nurse Licensure Compact Has Increased



Some Florida Psychologists Have Joined the Psychology Compact



15.6% (1,235) of psychologists can practice telepsychology in other states



0.8% (66) can practice temporary in-person psychology in other states

Data Limitation

OPPAGA was unable to determine the number of compact nurses or psychologists from other states that practice in Florida and the number of Florida licensees that use their license to practice in other states.

Physician Compact Participation



Few Florida medical doctors and osteopathic physicians have been licensed through the Interstate Medical Licensure Compact (IMLC)

Physicians Seeking a Compact License in Fiscal Year 2024-25	Compact Licensed Medical Doctors	Compact Licensed Osteopathic Physicians
Florida physicians seeking a license in other states	1,225 (1.2%)	187 (1.3%)
Other state physicians seeking a license in Florida	1,005	163

Data Limitation

- The IMLC requires licensees to obtain a license in each state where they want the ability to practice.
- However, licensees are not required to report where they actually practice.
- As a result, OPPAGA could not determine whether Florida physicians use their compact license to practice in another state or whether physicians from other states use their compact license to practice in Florida.

Proposed Compacts



Of the 11 health care compacts that Florida has not joined, the Legislature proposed legislation to join three compacts

Compact	Proposed or Not Considered	Compact Accepting Applications? *
Interstate Compact for School Psychologists	2025 House Bill 327 proposed joining	No
Occupational Therapy Licensure	2025 House Bill 909 proposed joining	No
Social Work Licensure	2025 House Bill 27 proposed joining	No
Advanced Practice Registered Nurse	Not considered	No
Athletic Trainer	Not considered	No
Dentist and Dental Hygienist	Not considered	No
Dietician Licensure	Not considered	No
Emergency Medical Services	Not considered	Yes
Massage Therapist	Not considered	No
Physician Assistant Licensure	Not considered	No
Respiratory Care	Not considered	No

* Compacts may not be accepting applications because the required number of states have not enacted compact legislation; the compact commission has not yet formed; or the compact commission is developing data systems and bylaws.

Key Considerations



If contemplating joining additional health care compacts, the Legislature should focus on key compact provisions

Shared Provisions

- ✓ Public safety
- ✓ Quality of care
- ✓ Licensure portability
- ✓ Administrative efficiencies



Compacts may conflict with state practice laws

Florida Law

- APRNs must practice under a supervisory agreement with a physician

APRN Compact

- Requires that APRNs comply with the state practice laws of the state where the client is located
- Excludes state laws, rules, or regulations that require supervision from its definition of state practice laws

Key Considerations



The Legislature may also need to consider allocating resources to implement health care compacts; Florida may lose licensing revenue

Costs of State Participation



Compact commissions can collect an annual assessment from each participating state



Florida has paid \$6,000 annually for Nurse Licensure Compact membership since Fiscal Year 2019-20



Florida has paid \$6,000 annually for Psychology Compact membership since Fiscal Year 2023-24



States may need to hire additional staff and invest in technology to implement compacts

Potential Loss of Revenue



Licensing revenue is a major source of funds to support health care practitioner regulation



Some compacts do not have provisions that would allow Florida to charge out-of-state compact practitioners a fee for a multistate license

Contact Information

Wendy Scott
Staff Director, Health and Human
Services

 (850) 717-0500

 Scott.Wendy@oppaga.fl.gov

**FLORIDA LEGISLATURE OFFICE OF PROGRAM POLICY ANALYSIS AND
GOVERNMENT ACCOUNTABILITY**

OPPAGA supports the Florida Legislature by providing data, evaluative research, and objective analyses that assist legislative budget and policy deliberations.