



Medicare Clarifies Recognition of Interstate License Compacts

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PROVIDER TYPES AFFECTED

This MLN Matters Article is for physicians and non-physician practitioners covered by interstate licensing compacts who wish to bill Medicare Administrative Contractors (MACs) for services provided to Medicare beneficiaries.

WHAT YOU NEED TO KNOW

This MLN Matters article clarifies the Centers for Medicare & Medicaid Services' (CMS) recognition of interstate license compacts as valid and full licenses for purposes of meeting federal license requirements.

BACKGROUND

CMS is aware of a new trend in medicine involving interstate license compacts. An interstate license compact offers a new, voluntary expedited pathway to licensure for qualified physicians and non-physician practitioners who wish to practice in multiple states.

A physician or non-physician practitioner working under the authorization of a compact must meet both the licensure requirements outlined in the primary state of residence and those established by the compact laws adopted by the legislatures of the interstate compact states. Currently, CMS has been made aware of the Physician, Physical Therapy, Occupational Therapy, Speech Language Therapy, Nurse Practitioner, and Psychology interstate license compacts, but more may be underway as new legislation is passed.

CMS has determined that the interstate license compacts, for the above provider types, will be treated as valid, full licenses for the purposes of meeting our federal license requirements. Your MACs will accept CMS-855 enrollment applications from providers reporting an interstate license compact. In addition to meeting the licensure requirements in the practitioner's primary state, they are required to meet the licensure requirements established by the interstate compact laws adopted by state legislation.

Your MAC will attempt to verify the interstate license compact using the state licensing board website, otherwise the MAC will request documentation from you to validate the interstate license compact information.

MACs will re-open any previously denied enrollment applications reporting an interstate license compact and continue processing. The effective date of billing will be based on the receipt date of the original application.

ADDITIONAL INFORMATION

See Chapter 15, Section 15.5.2.1 of the Program Integrity Manual, regarding verification of license and certification requirements for enrollment. This Chapter is available at <https://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/Downloads/pim83c15pdf.pdf>.

If you have questions, your MACs may have more information. Find their website at <http://go.cms.gov/MAC-website-list>.

DOCUMENT HISTORY

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May 5, 2020	Initial article released.

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