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Primary Sponsor: Sen. Roegner

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SUMMARY

- Enters Ohio into the Interstate Podiatric Medical Licensure Compact to provide a streamlined process that allows podiatric physicians to become licensed and practice in member states.
- Establishes requirements for podiatric physicians' expedited licensure under the Compact, including eligibility determination and application procedures.
- Authorizes joint investigations and adverse actions (revocation, surrender, relinquishment in lieu of discipline, and suspension of license or imposition of sanctions) by member states against licensees.
- Provides for the establishment and administration of Interstate Commission, a joint government agency whose membership consists of all Compact member states.
- Specifies procedures for Compact oversight, enforcement, default procedures, and dispute resolution, effective date, member state withdrawal, amendment, and dissolution.
- Provides for construction and severability, relationship with state legislatures, and definition.

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DETAILED ANALYSIS

Interstate Podiatric Medical Licensure Compact

Purpose

On the enactment of the bill, Ohio becomes a member state of the Interstate Podiatric Medical Licensure Compact. At the time of the bill's passage by the Senate, Maryland is the only state to have enacted the Compact.[1]

The Compact's purpose is to develop a comprehensive process that complements the existing licensing and regulatory authority of state podiatric medical boards and provides a streamlined process that allows podiatric physicians to become licensed in multiple states, thereby enhancing the portability of a podiatric medical license and ensuring the safety of patients. The Compact creates another pathway for licensure and does not otherwise change a state's existing Podiatric Medical Practice Act. The Compact also adopts the prevailing standard for licensure and affirms that the practice of podiatric medicine occurs where the patient is located at the time of the podiatric physician-patient encounter, and therefore, requires the podiatric physician to be under the jurisdiction of the state podiatric medical board where the patient is located. State podiatric medical boards that participate in the Compact retain the jurisdiction to impose an adverse action against a podiatric medicine licensee in that state.[2]

Compact privilege

Licensee requirements

To exercise compact privilege under the Compact, a licensee must:

1. Have graduated from a podiatric medical school accredited by the national Council of Podiatric Medical Education;
2. Have passed Parts I, II, and III of the National Board of Podiatric Medical Examiners' Examination (NBPME) or American Podiatric Medical Licensing Examination (APMLE), or their replacement examinations;
3. Have successfully completed a podiatric medicine program approved by the Council on Podiatric Medical Education;

[1] See Interstate Podiatric Medical Licensure Compact, Map of IPMLC Participating States, last accessed May 20, 2026.

[2] R.C. 4731.12; Section 1.

4. Hold specialty certification from a specialty board recognized by the Council on Podiatric Medical Education;
5. Possess a full and unrestricted license to engage in the practice of podiatric medicine issued by a member state board;
6. Have never been convicted, received an adjudication, deferred adjudication, community supervision, or deferred deposition for any offense by a court;
7. Have never held a license authorizing the practice of podiatric medicine subjected to discipline by a licensing agency in any jurisdiction, including any action related to nonpayment of fees related to a license;
8. Have never had a controlled substance license or permit suspended or revoked by a state or the U.S. Drug Enforcement Administration or voluntarily surrendered such license after notification of an investigation;
9. Not be under active investigation by a licensing agency or law enforcement authority in any jurisdiction.[3]

A podiatric physician who does not meet the above requirements may obtain a license to practice podiatric medicine in a member state if the individual complies with all laws and requirements, other than the Compact, relating to the issuance of a license to practice podiatric medicine in that state.[4]

Designation of state of principal license

A podiatric physician must designate a member state as the state of principal license for purposes of registration for expedited licensure through the Compact if the podiatric physician possesses a full and unrestricted license to practice podiatric medicine in that state, and the state is:

- The podiatric physician's state of principal residence;
- The state where at least 25% of the practice of podiatric medicine occurs;
- The location of the podiatric physician's employer; or
- If no state meets the abovementioned criteria, the state designated by the podiatric physician as the state of residence for purposes of federal income tax.

A podiatric physician may redesignate a member state as state of principal license at any time, if the state meets the Compact's requirements. The Compact's Interstate Commission may develop rules to facilitate redesignation of another member state as the state of principal license.[5]

[3] Section 2(m).

[4] R.C. 4731.12; Section 3.

[5] R.C. 4731.12; Section 4.

Application

A podiatric physician seeking licensure through the Compact must file an application for an expedited license with the member board of the state selected by the podiatric physician as the state of principal license.[6]

Verification

On receipt of an application for an expedited license, the member board within the state selected as the state of principal license must evaluate whether the podiatric physician is eligible for expedited licensure and issue a letter of qualification, verifying or denying the podiatric physician's eligibility to, and in the manner established through rule by, the Interstate Commission.[7]

Static qualifications, including verification of podiatric medical education, podiatric graduate medical education, results of any podiatric medical licensing examination, and other qualifications as determined by the Interstate Commission through rule, are not subject to additional primary source verification where already primary source verified by the state of principal license.[8]

Criminal background check

The member board within the state selected as the state of principal license must, in the course of verifying eligibility, perform a criminal background check of an applicant, including the use of results of fingerprint or other biometric data checks compliant with F.B.I. requirements, with the exception of federal employees who have federal civil service suitability determination in accordance with federal rules.[9]

Communication between a member board and the Interstate Commission and communication between member boards regarding the verification of eligibility through the Compact cannot include any information received from the F.B.I. relating to a federal criminal records check performed by a member board under federal law, including federal criminal records check information.[10] F.B.I. information obtained by a member board cannot be shared with the Interstate Commission.[11]

Appeal of eligibility determination

An appeal of an eligibility determination regarding an applicant must be made to the member state where the application was filed and is subject to the laws of that state.[12]

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[6] R.C. 4731.12; Section 5(a).

[7] R.C. 4731.12; Section 5(b).

[8] R.C. 4731.12; Section 5(b)(1).

[9] 5 Code of Federal Regulations 731.202, not in the bill.

[10] Public Law 92-544, not in the bill.

[11] R.C. 4731.12; Section 5(b)(2).

[12] R.C. 4731.12; Section 5(b)(3).

Registration

Upon verification of a podiatric physician's eligibility for an expedited license, the podiatric physician must complete the registration process established by the Interstate Commission to receive a license in the podiatric physician's state of principal license, including the payment of any applicable fees.[13]

Issuance of expedited license

After receiving verification of eligibility and any fees established by the Interstate Commission, a member board must issue an expedited license to the podiatric physician. This license authorizes the podiatric physician to practice podiatric medicine in the issuing state consistent with the Podiatric Medical Practice Act and all applicable laws and regulations of the issuing member board and member state.[14]

License duration and termination

An expedited license is valid for a period consistent with the licensure period in the member state and in the same manner as required for other podiatric physicians holding a full and unrestricted license within the member state. An expedited license must be terminated if a podiatric physician fails to maintain a license in the state of principal licensure for a nondisciplinary reason, without redesignation of a new state of principal licensure.[15]

The Interstate Commission may develop rules regarding the application process, including payment of any applicable fees, and the reporting of the issuance of an expedited license by a member board to the Interstate Commission.[16]

License renewal

A podiatric physician seeking to renew an expedited license granted in a member state must complete a renewal process with the Interstate Commission if the podiatric physician:

- Maintains a full and unrestricted license in a state of principal license;
- Has not been convicted, received adjudication, deferred adjudication, community supervision, or deferred disposition for any offense by a court of appropriate jurisdiction;
- Has not had a license authorizing the practice of podiatric medicine subject to discipline by a licensing agency in any state, federal, or foreign jurisdiction, or voluntarily surrendered such license in lieu of discipline, excluding any action related to nonpayment of fees related to a license; and

[13] R.C. 4731.12; Section 5(c).

[14] R.C. 4731.12; Section 5(d).

[15] R.C. 4731.12; Section 5(e) and (f).

[16] R.C. 4731.12; Section 5(g).

- Has not had a controlled substance license or permit suspended or revoked by a state or the U.S. Drug Enforcement Administration or voluntarily surrendered such license or permit after notification of investigation.

Podiatric physicians must comply with all continuing professional development or continuing medical education requirements for renewal of a license issued by a member state.

The Interstate Commission must collect any renewal fees charged for the renewal of a license and distribute the fees to the applicable member board. Upon receipt of any renewal fees collected, a member board must renew the podiatric physician's license. Podiatric physician information collected by the Interstate Commission during the renewal process will be distributed to all member boards.

The Interstate Commission may develop rules to address renewal of licenses obtained through the Compact.[17]

Fees for licensure and renewal

A member state issuing an expedited license may impose a fee for a license issued or renewed through the Compact. The Interstate Commission may develop rules regarding fees for expedited licenses.[18]

Coordinated information system

The Interstate Commission must establish a database of all podiatric physicians licensed, or who have applied for licensure, under the Compact.

Member boards must report the following to the Interstate Commission:

- Any public action or public complaints against a licensed podiatric physician who has applied or received an expedited license through the Compact;
- Disciplinary or investigatory information determined as necessary and proper by rule of the Interstate Commission.

Member boards are permitted to report any nonpublic complaint, disciplinary, or investigatory information not required by the Compact.

Member boards are required to share complaints or disciplinary information about a podiatric physician upon request of another member board. All information provided to the Interstate Commission or distributed by member boards is confidential, filed under seal, and used only for investigatory or disciplinary matters.

The Interstate Commission may develop rules for mandated or discretionary sharing of information by member boards.[19]

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[17] R.C. 4731.12; Section 7.

[18] R.C. 4731.12; Section 6.

[19] R.C. 4731.12; Section 8.

Joint investigations

Under the Compact, licensure and disciplinary records of podiatric physicians are deemed investigative.

In addition to the authority granted to a member board by its respective Podiatric Medical Practice Act or other applicable state law, a member board may participate with other member boards in joint investigations of podiatric physicians licensed by the member boards. A subpoena issued by a member state as part of a joint investigation is enforceable in other member states.

Member boards may share any investigative, litigation, or compliance materials in furtherance of any joint or individual investigation initiated under the Compact. Any member state may investigate actual or alleged violation of the statutes authorizing the practice of podiatric medicine in any other member state in which a podiatric physician holds a license to practice podiatric medicine.[20]

Disciplinary actions

Any disciplinary action taken by any member board against a podiatric physician licensed through the Compact must be deemed unprofessional conduct that may be subject to discipline by other member boards, in addition to any violation of the Podiatric Medical Practice Act or regulations in that state.

If a license granted to a podiatric physician by a member board in the state of principal license is revoked, surrendered, relinquished in lieu of discipline, or suspended, then all licenses issued to the podiatric physician by member boards must automatically be placed on the same status, without further action necessary by any member board. If the member board is the state of principal license subsequently reinstates the podiatric physician's license, a license issued to the podiatric physician by any other member board must remain encumbered until that respective member board takes action to reinstate the license in a manner consistent with the Podiatric Medical Practice Act of that state.

If disciplinary action is taken against a podiatric physician by a member board not in a state of principal license, any other member board may deem the action conclusive as to matter of law and fact decided, and do either of the following:

- Impose the same or lesser sanctions against the podiatric physician, so long as such sanctions are consistent with the Podiatric Medical Practice Act of that state; or
- Pursue separate disciplinary action against the podiatric physician under its respective Podiatric Medical Practice Act, regardless of the action taken in other member states.

If a license granted to a podiatric physician by a member board is revoked, surrendered or relinquished in lieu of discipline, or suspended, then any licenses issued to a podiatric physician by any other member boards must be suspended, automatically and immediately without further action necessary by the other member boards, for 90 days upon entry of the order by the

[20] R.C. 4731.12; Section 9.

disciplining board, to permit the member boards to investigate the basis for the action under the Podiatric Medical Practice Act of that state.

A member board may terminate the automatic revocation, surrender, relinquishment, suspension, or imposition of sanctions of a license it issued, in a manner consistent with the Podiatric Medical Practice Act of that state.[21]

Interstate Commission

Creation and purpose

The Compact's member states create an Interstate Commission. The purpose of the Interstate Commission is to administer the Compact, which is a discretionary state function.

The Interstate Commission is a body corporate and joint agency of the member states and has all the responsibilities, powers, and duties set forth in the Compact, and such additional powers as may be conferred upon it by a subsequent concurrent action of the respective member states' legislatures in accordance with the terms of the Compact.[22]

Membership

The Interstate Commission consists of one voting representative appointed by each member state to serve as a commissioner. A commissioner must be any of the following:

- Podiatric physician appointed to a member board;
- Executive director, executive secretary, or similar executive of a member board; or
- Member of the public appointed to a member board.[23]

Appointment of Ohio commissioner

The bill requires, no later than 30 days after Ohio enters into the Compact, the State Medical Board to select an individual to serve as a commissioner to the Interstate Commission. The Board must fill any vacancy in this position no later than 30 days after the vacancy occurs.[24]

Meetings

The Interstate Commission must meet at least once each calendar year. A portion of this meeting must be a business meeting to address such matters as may properly come before the Interstate Commission, including the election of officers. The chairperson may call additional meetings and must call for a meeting upon the request of a majority of the member states.

The bylaws can allow for meetings of the Interstate Commission to be conducted, in whole or in part, via teleconference, video conference, or other electronic means by which all

[21] R.C. 4731.12; Section 10.

[22] R.C. 4731.12; Section 11(a) to (c).

[23] R.C. 4731.12; Section 11(d).

[24] R.C. 4731.121.

participants can hear each other simultaneously and participate effectively. Attendance by such electronic means constitutes presence in person at the meeting.

Each commissioner participating at a meeting is entitled to one vote. A majority of commissioners constitute a quorum for the transaction of business, unless a larger quorum is required by the Interstate Commission's bylaws. A commissioner cannot delegate a vote to another commissioner. In the absence of a member state's commissioner, the member state may delegate voting authority for a specified meeting to another person from that state who meets the Interstate Commission membership requirements.

The Interstate Commission must provide public notice of all meetings and all meetings must be open to the public. The Interstate Commission may close a meeting, in full or in portion, where it determines by a two-thirds vote of the commissioners present that any open meeting would be likely to do any of the following:

- Relate solely to the internal personnel practice and procedures of the Interstate Commission;
- Discuss matters specifically exempted from disclosure by federal statute;
- Discuss trade secrets, commercial, or financial information that is privileged or confidential;
- Involve accusing a person of a crime, or formally censuring a person;
- Discuss information of a personal nature where disclosure would constitute a clearly unwarranted invasion of personal privacy;
- Discuss investigative records compiled for law enforcement purposes;
- Specifically relate to the participation in a civil action or other legal proceeding.

The Interstate Commission must keep minutes which fully describe all matters discussed in a meeting and provide a full and accurate summary of actions taken, including record of any roll call votes. It must make its information and official records, to the extent not otherwise designated in the Compact or by its rules, available to the public for inspection.[25]

Executive and other committees

The Interstate Commission must establish an executive committee, which includes officers, members, and others as determined by the bylaws. The executive committee has the power to act on behalf of the Interstate Commission, with the exception of rulemaking, during periods when the Interstate Commission is not in session. When acting on behalf of the Interstate Commission, the executive committee oversees the administration of the Compact, including enforcement and compliance, its bylaws and rules, and other such duties as necessary.

[25] R.C. 4731.12; Section 11(e) to (j).

The Interstate Commission must establish other committees for the Compact's governance and administration.[26]

Powers and duties

The Interstate Commission has the following powers and duties:

- Oversee and maintain the administration of the Compact;
- Promulgate rules, which are binding to the extent and in the manner provided for in the Compact;
- Issue, upon the request of a member state or member board, advisory opinions concerning the meaning or interpretation of the Compact, its bylaws, rules, and actions;
- Enforce compliance with Compact provisions, the rules promulgated by the Interstate Commission, and the bylaws, using all necessary and proper means, including but not limited to the use of judicial process;
- Establish and appoint committees including an executive committee as required by the Compact, which has the power to act on behalf of the Interstate Commission in carrying out its powers and duties;
- Pay, or provide for the payment of, the expenses related to the establishment, organization, and ongoing activities of the Interstate Commission;
- Establish and maintain one or more offices;
- Borrow, accept, hire, or contract for services of personnel;
- Purchase and maintain insurance and bonds;
- Employ an executive director who is to have the power to employ, select or appoint employees, agents, consultants, and to determine their qualifications, define their duties, and fix their compensation;
- Establish personnel policies and programs relating to conflicts of interest, rates of compensation, and qualification of personnel;
- Accept donations and grants of money, equipment, supplies, materials, and services to receive, utilize, and dispose of it in a manner consistent with the conflict of interest policies established by the Interstate Commission;
- Lease, purchase, accept contributions or donations of, or otherwise to own, hold, improve or use, any property, real, personal, or mixed;
- Sell, convey, mortgage, pledge, lease, exchange, abandon, or otherwise dispose of any property, real, personal, or mixed;

[26] R.C. 4731.12; Section 11(k) and (l).

- Establish a budget and make expenditures;
- Adopt a seal and bylaws governing the Interstate Commission's management and operation;
- Report annually to the member states' legislatures and governors concerning the activities of the Interstate Commission during the preceding year. Such reports must include reports of financial audits, and financial statements, and any recommendations that may have been adopted by the Interstate Commission;
- Coordinate education, training, and public awareness regarding the Compact, its implementation, and its operation;
- Maintain records in accordance with the bylaws;
- Seek and obtain trademarks, copyrights, and patents; and
- Perform such functions as may be necessary or appropriate to achieve the purpose of the Compact.[27]

Finance powers

The Interstate Commission may levy on and collect an annual assessment from each member state to cover the cost of its operations, activities, and staff. The total assessment must be sufficient to cover the annual budget approved each year for which revenue is not provided by other sources. The aggregate annual assessment amount is to be allocated upon a formula to be determined by the Interstate Commission, which must promulgate a rule binding upon all member states.

The Interstate Commission cannot incur obligations of any kind prior to securing the funds adequate to meet the same. It cannot pledge the credit or any of the member states, except by, and with the authority of, the member state.

The Interstate Commission must maintain financial records in accordance with the bylaws, including profit and loss statements and balance sheet reports must be included in the annual report.[28]

Organization and operation

The Interstate Commission must, by a majority of commissioners present and voting, adopt bylaws to govern its conduct as may be necessary or appropriate to carry out the purposes of the Compact within 12 months of its first meeting.

A chairperson, a vice-chairperson, and a treasurer must be elected or appointed annually from among the commissioners, each of whom have such authority and duties as may be specified in the bylaws. The chairperson, or in the chairperson's absence or disability, the

[27] R.C. 4731.12; Section 12.

[28] R.C. 4731.12; Section 13.

vice-chairperson, is to preside at all Interstate Commission meetings. The officers elected or appointed serve without remuneration.[29]

Immunity and liability

The Interstate Commission's officers and employees are immune from suit and liability, either personally or in their official capacity, for a claim for damage to or loss of property or personal injury or other civil liability caused or arising out of, or relating to, an actual or alleged act, error, or omission that occurred, or that such person had a reasonable basis for believing occurred, within the scope of the Interstate Commission employment, duties, or responsibilities; provided that such person cannot be protected from suit or liability for damage, loss, injury, or liability caused by the intentional or willful and wanton misconduct of such person.

The liability of the Interstate Commission's executive director, employees, and representatives, acting within the scope of such person's employment or duties for acts, errors, or omissions occurring within such person's state, cannot exceed the limits of liability set forth under the constitution and laws of that state for state officials, employees, and agents. The Interstate Commission is considered to be an instrumentality of the states for the purpose of such action. Nothing in the Compact can be construed to protect such person from suit or liability for damage, loss, injury, or liability caused by the intentional or willful and wanton misconduct of such person.

The Interstate Commission must defend the executive director, its employees, and, subject to the approval of the Attorney General or other appropriate legal counsel of the member state representative, must defend such representative in any civil action seeking to impose liability arising out of an actual or alleged act, error or omission that occurred within the scope of Interstate Commission employment, duties or responsibilities, or that the defendant had a reasonable basis for believing occurred within the scope of the Interstate Commission employment, duties, or responsibilities, provided that the actual or alleged act, error, or omission did not result from intentional or willful and wanton misconduct on the part of such person.

To the extent not covered by the state involved, member state, or the Interstate Commission, the Interstate Commission's representatives or employees are to be held harmless in the amount of a settlement or judgement, including attorney's fees and costs, obtained against such persons arising out of an actual or alleged act, error, or omission that occurred within the scope of the Interstate Commission employment, duties, or responsibilities, or that such persons had a reasonable basis for believing occurred within the scope of Interstate Commission employment, duties, or responsibilities. These provisions apply provided that the actual or alleged act, error, or omission did not result from intentional or willful and wanton misconduct on the part of such person.[30]

[29] R.C. 4731.12; Section 14(a) to (c).

[30] R.C. 4731.12; Section 14(d) to (g).

Rulemaking functions

The Interstate Commission must promulgate rules to effectively and efficiently achieve the Compact's purpose. However, in the event the Interstate Commission exercises its rulemaking authority in a manner that is beyond the scope of the Compact's purposes or the powers granted hereunder, then such an action is invalid and has no force or effect.

Rules deemed appropriate for the Interstate Commission's operations must be made pursuant to the rulemaking process that substantially conforms to the "Model State Administrative Procedure Act" of 2010, and subsequent amendments thereto.

No later than 30 days after a rule is promulgated, any person may file a petition for judicial review of the rule in the United States District Court for the District of Columbia or the federal district where the Interstate Commission has its principal offices, provided that the filing of such a petition does not stay or otherwise prevent the rule from becoming effective unless the court finds that the petitioner has a substantial likelihood of success. The court must defer to the Interstate Commission's actions consistent with applicable law and cannot find the rule to be unlawful if the rule represents a reasonable exercise of the authority granted to the Interstate Commission.[31]

Oversight, enforcement, default procedures, and dispute resolution

Oversight

Each member state's executive, legislative, and judicial branches must enforce the Compact and take all actions necessary and appropriate to effectuate the Compact's purposes and intent. The Compact's provisions and rules have standing as statutory law but do not override existing state authority to regulate the practice of podiatric medicine.

All courts must take judicial notice of the Compact and the rules in any judicial or administrative proceeding in a member state pertaining to the subject matter of the Compact which may affect the powers, responsibilities, or actions of the Interstate Commission.

The Interstate Commission is entitled to receive all services of process in any such proceeding, and has standing to intervene in the proceeding for all purposes. Failure to provide service of process to the Interstate Commission will render judgment or order void as to the Interstate Commission, the Compact, or promulgated rules.[32]

Enforcement

The Interstate Commission, in the reasonable exercise of its discretion, must enforce the Compact's provisions and rules. It may, by majority vote of the Commissioners present and voting, initiate legal action in the United States Court for the District of Columbia, or, at the discretion of the Interstate Commission, in the federal district where the Interstate Commission has its principal offices, to enforce compliance with the Compact's provisions, promulgated rules, and bylaws, against a member state in default. The relief sought may include both injunctive

[31] R.C. 4731.12; Section15.

[32] R.C. 4731.12; Section 16.

relief and damages. In the event judicial enforcement is necessary, the prevailing party must be awarded all costs of such litigation including reasonable attorney's fees.

The remedies are not the exclusive remedies of the Interstate Commission. The Interstate Commission may avail itself of any other remedies available under state law or regulation of a profession.[33]

Default procedures

The grounds for default include failure of a member board to perform such obligations or responsibilities imposed upon it by the Compact, or the rules and bylaws of the Interstate Commission promulgated under the Compact. If the Interstate Commission determines that a member state has defaulted in the performance of its obligations or responsibilities under the Compact, or the bylaws or promulgated rules, the Interstate Commission must do the following:

- Provide written notice to the defaulting state and other member states, of the nature of the default, the means of curing the default, and any action taken by the Interstate Commission. The Interstate Commission must specify the conditions by which the defaulting state must cure its default; and
- Provide remedial training and specific technical assistance regarding the default.

If the defaulting state fails to cure the default, the defaulting state will be terminated from the Compact upon an affirmative vote of the majority of the Commissioners present and voting, and all rights, privileges, and benefits conferred by the Compact will terminate on the termination's effective date. A cure of the default does not relieve the offending state of obligations or liabilities incurred during the period of default.

Membership termination is to be imposed only after all other means of securing compliance have been exhausted. Notice of intent to terminate must be given by the Interstate Commission to the governor, the majority and minority leaders of the defaulting state's legislature, and each of the member states.

The Interstate Commission must establish rules and procedures to address licenses and podiatric physicians that are materially impacted by the member state's termination or withdrawal.

The terminated member state is responsible for all dues, obligations, and liabilities incurred through the termination's effective date, including obligations, the performance of which extends beyond the effective date of termination. The Interstate Commission will not bear any costs relating to any state that has been found to be in default or which has been terminated, unless otherwise mutually agreed upon in writing between the Interstate Commission and the defaulting state.

The defaulting state may appeal the Interstate Commission's action by petitioning the U.S. District Court for the District of Columbia or the federal district where the Interstate

[33] R.C. 4731.12; Section 17.

Commission has its principal offices. The prevailing party must be awarded all costs of litigation, including reasonable attorney's fees.[34]

Dispute resolution

The Interstate Commission must attempt, upon the request of a member state, to resolve disputes which are subject to the Compact and which arise among member states or member boards. It must promulgate rules providing for both mediation and binding dispute resolution as appropriate.[35]

Administration of Compact

Member states, effective date, and amendment

Any state is eligible to become a member of the Compact. The Compact becomes effective and binding upon legislative enactment of the Compact into law by no less than four states. Thereafter, it becomes effective and binding on a state upon enactment of the Compact into law by that state. The governors of nonmember states, or their designees, are welcome to participate in Interstate Commission activities on a nonvoting basis prior to adoption of the Compact by all states.

The Interstate Commission may propose amendments to the Compact for enactment by the member states. No amendment becomes effective and binding upon the Interstate Commission and other member states unless and until it is enacted into law by unanimous consent of the member states.[36]

Withdrawal

Once effective, the Compact continued in force and remains binding on each and every member state; provided that a member state may withdraw from the Compact by specifically repealing the statute which enacted the Compact into law.

Withdrawal from the Compact is done by the enactment of a statute repealing the same, but does not take effect until one year after the statute's effective date and until written notice of the withdrawal has been given by the withdrawing state to the governor of each other member state.

The withdrawing state must immediately notify the Interstate Commission's chairperson in writing on the introduction of legislation repealing the Compact in the withdrawing state. The Interstate Commission must notify the other member states of the withdrawing state's intent to withdraw within 60 days of its receipt of notice.

The withdrawing state is responsible for all dues, obligations, and liabilities incurred throughout the effective date of withdrawal, including obligations, the performance of which extend beyond the effective date of withdrawal.

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[34] R.C. 4731.12; Section 18.

[35] R.C. 4731.12; Section 19.

[36] R.C. 4731.12; Section 20.

Reinstatement following a member state's withdrawal occurs upon the withdrawing date reenacting the Compact or upon such later date as determined by the Interstate Commission. The Interstate Commission may develop rules to address the impact of the withdrawal of a member state on licenses granted in other member states to podiatric physicians who designated the withdrawing member state as the state of principal license.[37]

Dissolution

The Compact is dissolved effective on the date of the withdrawal or default of the member state which reduces the Compact's membership to a single member state. Upon the dissolution of the Compact, the Compact becomes null and void and is of no further force or effect, the business and affairs of the Interstate Commission must be concluded, and surplus funds must be distributed in accordance with the bylaws.[38]

Severability and construction

The Compact's provisions are severable, and if any phrase, clause, sentence, or provision is deemed unenforceable, the remaining provisions are enforceable. The provisions must be liberally construed to effectuate its purposes. Nothing in the Compact can be construed to prohibit the applicability of other interstate compacts to which the member states are members.[39]

Binding effect of compact and other laws

Nothing in the Compact prevents the enforcement of any other law of a member state that is not inconsistent with the Compact. All laws in a member state in conflict with the Compact are superseded to the extent of the conflict. All lawful actions of the Interstate Commission, including all rules and bylaws promulgated by the Commission, are binding upon all member states. All agreements between the Interstate Commission and the member states are binding in accordance with their terms. In the event of any provision of the Compact that exceeds the constitutional limits imposed on the legislature of any member state, such provision must be ineffective to the extent of the conflict with the constitutional provision in question in that member state.[40]

Definitions

The bill defines the following terms:

- "Bylaws" means those bylaws established by the Interstate Commission in accordance with the bill.
- "Commissioner" means the voting representative appointed by each member board.

[37] R.C. 4731.12; Section 21.

[38] R.C. 4731.12; Section 22.

[39] R.C. 4731.12; Section 23.

[40] R.C. 4731.12; Section 24.

- "Conviction" means a finding by a court that an individual is guilty of a criminal offense through adjudication, or entry of a plea of guilt or no contest to the charge by the offender. Evidence of an entry of conviction of a criminal offense by the court must be considered final for purposes of disciplinary action by a member board.
- "Expedited License" means a full unrestricted podiatric medical license granted by a member state to an eligible podiatric physician through the Compact's process.
- "Criminal background check" means that the member board is authorized to obtain an F.B.I. biometric-based Federal Criminal Records Check Information report from the authorized state agency for the exclusive purpose of determining eligibility for certification of qualification that would allow for an expedited license.
- "Federal Criminal Records Check Information" means any information obtained by a member board from the F.B.I. relating to a federal criminal records check performed by a member board under Public Law 92-544.
- "Interstate Commission" means the interstate commission created under the bill.
- "License" means authorization by a member state for a podiatric physician to engage in the practice of podiatric medicine, which would be unlawful without authorization.
- "Podiatric Medical Practice Act" means laws and regulations governing the practice of podiatric medicine within a member state.
- "Member Board" means a state agency in a member state that acts in the sovereign interest of the state by protecting the public through licensure, regulation, and education of podiatric physicians as directed by the state government.
- "Member state" means a state which has enacted the Compact.
- "Practice of podiatric medicine" means that clinical prevention, diagnosis, or treatment of human disease, injury, or condition requiring a podiatric physician to obtain and maintain a license in compliance with the Podiatric Medical Practice Act of a member state.
- "Offense" means a felony, gross misdemeanor, or a misdemeanor related to the practice of podiatry.
- "Rule" means a written statement by the Interstate Commission under the bill that is of general applicability, implements, interprets, or prescribes a policy or provision of the Compact, or an organizational, procedural, or practice requirement of the Interstate Commission, and has the force and effect of statutory law in a member state, and includes the amendment, repeal, or suspension of an existing rule.
- "State" means any state, commonwealth, district, or territory of the United States.

- "State of principal license" means a member state where a podiatric physician holds a license to practice podiatric medicine and which has been designated by such a podiatric physician for purposes of registration and participation in the Compact.[41]

HISTORY

Action	Date
Introduced	02-10-26
Reported, S. Health	05-20-26
Passed Senate (30-1)	05-20-26

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[41] R.C. 4731.12; Section 2.