



Senate Bill 6 Testimony-State Medical Board of Ohio

February 3, 2021

Chairman Huffman, Vice Chair Antani, Ranking Member Antonio and members of the Senate Health, Human Services and Medicaid Committee. My name is Chelsea Wonski, and I serve as the Legislative Director for the State Medical Board of Ohio (the “Board” or “Medical Board”). Thank you for the opportunity to provide written testimony regarding Senate Bill 6.

The Medical Board appreciates the spirit of Senate Bill 6 and supports the opportunity that joining the Interstate Medical Licensure Compact (“IMLC” or the “Compact”) may create for physicians licensed in Ohio to expand their practices outside of our state. We also recognize the potential to expand telehealth services, especially to patients in areas with limited access to health care.

As much has been referenced about the expediency of licensure under the Compact, the Board would like to clarify the understanding of the time it may take out-of-state applicants to achieve licensure in Ohio through the Compact. Additionally, the Board very much appreciates the opportunity to work with you on both implementation of the law, as well as concerns the Board has about standard of care provided by out-of-state telehealth providers.

Application Timelines

It currently takes a physician, on average, 18 days to become licensed in Ohio, if the applicant submits all necessary paperwork. In the event that more information, such as a background check, is needed, the average time for licensure in Ohio increases to only 25 days. The median time for a physician to obtain licensure in Ohio, even when more information like a background check is needed, is 12 days. Further, the application process to our Board utilizes one of the more sophisticated licensing systems in the country.

Leadership of the IMLC has indicated it can take 35 to 40 days, on average, to achieve licensure under the compact. While it may be faster for Ohio applicants to achieve licensure in other states through the Compact, it likely will not be faster for out-of-state applicants to achieve licensure in Ohio through the Compact.

Implementation

The IMLC estimates that over 84% of Ohio’s 51,000+ physicians will be eligible for the Compact. The Board recognizes that to implement the IMLC, we will need both focus and a realistic timeline to ensure proper staffing, systems and fiscal arrangements. We do not want to let our licensees down. As currently written, membership in the IMLC becomes effective upon enactment of the law, presumably 90 days from the effective

date. The Medical Board respectfully requests an implementation date of at least one year from enactment to permit the Board and the IMLC a seamless transition.

The Medical Board will need to work on many initial legalities with the IMLC commission, attend training with IMLC staff, and have dialogue with other member states. Other member states have indicated it was necessary to assign staff to handle the transition into the Compact and to have a staff member permanently assigned to Compact applications. The Medical Board is not currently equipped for this and we will have to staff accordingly. Additionally, it is our understanding that the reimbursement process with the IMLC is more manual than the process the Board uses with our licensees today. We will need to ensure the proper fiscal setup for the transfer of funds and adequate accounting. Finally, the IMLC does not use a licensing system compatible with our licensing system. We will need to work through the IMLC's stand alone process and determine how we can integrate Compact licensees into our licensing system so we can avoid tracking renewals, and even discipline, in a manual way. Again, all of these efforts will take time to ensure long-term success.

Ongoing relationship with the IMLC Commission

Upon passage, this legislation will make Ohio one of the largest member states of the IMLC, with a very high number of applicants suddenly eligible for the Compact. In fact, the IMLC has rarely seen as many applicants suddenly eligible for licensure, as will happen if Ohio joins. Over the past four years, the IMLC has processed around 11,000 applications total. The State Medical Board of Ohio sees an average of 10,000 new applications every year. Due to Ohio's large number of licensees, and the uncertainty of the IMLC's infrastructure to support this volume, we appreciate your ongoing support with the IMLC commission leadership if we, as a member state, have concerns that need to be addressed or if we need assistance engaging in meaningful roles in the IMLC commission structure.

Telehealth

Finally, the Board reiterates our recognition of the value that telehealth provides to many of our citizens, especially during the Covid-19 pandemic and especially in areas of healthcare shortages. The Board strongly believes that the standard of care for telehealth services should be equal to the standard of care for in-person services. We will need to keep a constant eye that providers from other states will adhere to the standards of care that have been established in rule and law here in Ohio. In the event the Compact becomes law, we will keep you apprised of any ongoing concerns we observe with out-of-state telehealth providers.

Conclusion

Chairman Huffman, Vice Chair Antani, Ranking Member Antonio and members of the Senate Health, Human Services and Medicaid Committee. Thank you again for the opportunity to provide testimony regarding Senate Bill 6. We very much appreciate your willingness to consider our observations relative to Ohio's entrance into the IMLC and our duty to protect the public.

If you have any questions or concerns for me, please do not hesitate to reach me by phone 614-230-4253 or by email at Chelsea.Wonski@med.ohio.gov.
