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February 15, 2024

Susan R. Donovan, Chair
House Committee on Health and Human Services
State House
82 Smith St.
Providence, RI 02903

RE: H 7442 -- An Act Relating to Businesses and Professions -- Interstate Medical Licensure Compact

Dear Chair Donovan:

Please accept this letter with concerns regarding H 7442, legislation that would require the Rhode Island Department of Health (RIDOH) to implement the Interstate Medical Licensure Compact (IMLC) no later than July 1, 2024, and to expand access to telehealth for all Rhode Islanders by allowing treatment by out-of-state providers who register with RIDOH. RIDOH offers the following comments for the Committee's consideration.

Regarding the telehealth provisions included in H 7442, RIDOH currently reviews applicants for professional licensure, including credentials review and other due diligence, to protect the public's safety. RIDOH's Board of Medical Licensure and Discipline (BMLD) is currently working to implement the IMLC in the hope of increasing healthcare, including telehealth, services provided by physicians to Rhode Islanders. Implementing the IMLC in Rhode Island will improve access to quality healthcare for Rhode Islanders; however, creating a separate registration process for telemedicine (instead of ensuring that physicians have a license to practice in the state), will detract from that goal.

Most physicians who participate in the IMLC do so to be licensed in all 50 states and can provide telehealth services. While the use of telehealth has increased access to care, the quality of that care could be jeopardized by not ensuring that practitioners are fully licensed before interacting with patients. Rhode Island's existing licensing process allows the BMLD to verify education and training and review prior malpractice claims and disciplinary actions taken in other states. RIDOH is working to implement the IMLC, which will ensure that participating physicians performing telehealth from outside of the State will be properly licensed in Rhode Island. For public health and safety, licensing of physicians—and the detailed review of records that it entails—is critical.

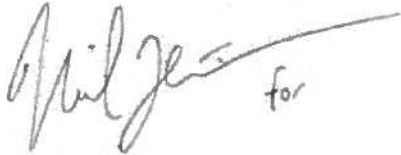
In addition, a separate *registration* process for those who only wish to practice telehealth could lead to confusion for the public and wasteful duplication of RIDOH and taxpayer resources. RIDOH has recently completed the process of joining compacts for both Psychologists and Nurses and is now focusing on implementing the requirements to join the IMLC.

Operationalizing RIDOH's IMLC will require the configuration of data-sharing capability between RIDOH's licensing system (MLO) and the IMLC. This process was recently undertaken with the Nurse Licensing Compact and requires significant time and effort from RIDOH's IT staff and the

MLO vendor. Please know that RIDOH is working as expeditiously as possible to complete this work to provide both our licensees and facilities with the benefits of IMLC membership.

I thank you for the opportunity to comment on the proposed legislation.

Sincerely,

A handwritten signature in cursive script, appearing to read "Utpala Bandy", followed by the word "for" written in a smaller, simpler font.

Utpala Bandy, MD, MPH
Interim Director

CC: The Honorable Members of the House Committee on Health and Human Services
The Honorable Michael Chippendale
Nicole McCarty, Chief Legal Counsel
Lynne Urbani, Director of House Policy