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April 14, 2026

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

RE: H 7273 -- An Act Relating to Businesses and Professions – Interstate Medical Licensure Compact

Dear Chair Donovan:

Please accept this letter, with concerns, regarding H 7273, legislation that would require the Rhode Island Department of Health (RIDOH) to implement the Interstate Medical Licensure Compact (IMLC) no later than July 1, 2026. This bill would also allow for all in-state residents to have access to telemedicine in accordance with existing Rhode Island law.

The primary delay in implementing the IMLC continues to be that the Rhode Island Attorney General's (RIAG) Bureau of Criminal Identification Unit (BCI) currently lacks the requisite legal permission from the Federal Bureau of Investigation to perform national fingerprint/biometric criminal background checks on physician applicants who seek to apply to RIDOH's Board of Medical Licensure and Discipline (BMLD) via the IMLC. The inability to practice in other Compact states prevents physicians from providing continuity of care for patients who are out of state for long periods of time, including college students or people on extended vacations or sabbaticals.

Any state medical board wishing to perform these background checks, which are required in the initial compact legislation, must obtain permission from the FBI to perform the checks in accordance with 34 U.S.C. § 41101. The difficulty in obtaining FBI permission is the reason that medical boards have had significant delays (years) in implementing the Compact in their respective states. Additionally, inconsistent interpretations by regional and local FBI offices have further contributed to these delays. Legislation has been introduced at the federal level (the *SHARE Act - [SHARE Act A Viable Solution to Licensure Compact Barrier - The Council of State Governments](#)*) which would create a pathway for all state medical boards that participate in the IMLC the permission to perform federal criminal background checks on physician applicants. RIDOH has been in discussions with Rhode Island's Congressional delegation, and RIDOH is in support of the *SHARE Act*. Our Congressional delegation tells us that it is unlikely to pass during this Congressional session.

Accordingly, RIDOH has met with RIAG BCI and discussed the FBI's Office of General Counsel's (OGC) requirement that specific language must be enacted in State statute before the FBI will give RIAG permission to do the background checks. Section 7 of the Governor's Budget Amendment 6 (Rural Health Transformation Program Amendment) adds a section to R.I.G.L. § 5-91 to require that any state and federal criminal history records received by the BMLD shall not be disseminated to the IMLC. However, the FBI generally requires that everything needs to be in State law, not in a third-party rule or executive order.

Maine passed legislation last year (PL 2025 ch. 366) to permit the state board to obtain national criminal background checks in order to implement the Physician Assistant (PA) compact, which has similar

national background check requirements as the IMLC. The language in Section 7 is based on Maine's enacted legislation, so RIDOH is hopeful that the FBI will approve it as is.

In addition, Rhode Island's Rural Health Transformation Grant includes contractor support to implement the IMLC, which has been another issue as Rhode Island's IMLC statute was enacted without funding to support implementation.

Telemedicine services are a core tenant of the IMLC. The introduction on the IMLC [website](#) states that "the mission of the Compact is to increase access to health care for patients in underserved or rural areas and allow them to more easily connect with medical experts through the use of telemedicine technologies."

Thank you for the opportunity to comment on this legislation. RIDOH encourages the sponsors of H 7273 and the members of the Committee to favorably consider the Governor's Budget Amendment # 6 (Rural Health Transformation Program). We are happy to answer any questions the Committee may have.

Sincerely,



Jerome M. Larkin, MD
Director

CC: The Honorable Members of the House Committee on Health & Human Services
The Honorable Marie A. Hopkins
Nicole McCarty, Esquire, Chief Legal Counsel
Lynne Urbani, Director of House Policy