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Providence, RI 02908-5097

TTY: 771
www.health.ri.gov

March 3, 2026

The Honorable Melissa A. Murray, Chair
Senate Committee on Health and Human Services
State House
82 Smith St.
Providence, RI 02903

RE: S 2458 – An Act Relating to Businesses and Professions -- Interstate Medical Licensure Compact

Dear Chair Murray:

Please accept this letter, with concerns, regarding S 2458, 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 RIDOH's Board of Medical Licensure and Discipline (BMLD) does not currently perform national fingerprint/biometric criminal background checks on applicants. Failure to implement this capability will mean Rhode Island physicians cannot join the Compact and cannot be licensed in other Compact states. 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 must obtain permission from the FBI. The difficulty in getting FBI permissions is quite often the reason that medical boards have significant delays (years) in implementing the Compact in their respective states. RIDOH has discussed this issue with the Office of the Rhode Island Attorney General (RIAG), and the RIAG has provided language that needs to be enacted in state statute before the FBI will give RIDOH permission to do the background checks. In addition, legislation is being 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 federal 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 general support of this bill.

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." Once the Compact is implemented, there will not need to be separate statutory language to allow telemedicine in Rhode Island. To avoid any possible

conflict between the two statutes, RIDOH would recommend not including R.I. Gen. Law 23-104-1. Telemedicine and out-of-state medicine.

Thank you for the opportunity to comment on this legislation.

Sincerely,

A handwritten signature in black ink that reads "Jerome M. Larkin". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Jerome M. Larkin, MD
Director

CC: The Honorable Members of the Senate Committee on Health and Human Services
The Honorable Peter A. Appollonio Jr.
Kristen Silvia, Director of Legislation and Deputy Chief of Staff
Patricia Resende, Director of Senate Policy