

50-State Survey: Temporary Medical Licensure Measures for Out-of-State Practitioners in Response to COVID-19

KEY	Licensure Changes for In-Person, Telemedicine and Mental Health Care	Notes
	Some Licensure Changes	
	No Licensure Changes	
State		
Alabama		<p>In-Person Care: Lifts licensure restrictions for emergency workers.</p> <p>Telehealth/Mental Health: No mention of telehealth or mental health.</p>
Alaska		No changes related to licensing for in-person care, telehealth, or mental health.
Arizona		<p>In-Person Care: Allows ADHS to waive licensing requirements to provide healthcare officials with assistance in delivering services during times of heightened demand. ADHS also made recommendations that all outpatient providers move to telehealth visits, encourage use of telehealth, etc.</p> <p>Telehealth/Mental Health: No mention of telehealth or mental health.</p>
Arkansas		No changes related to licensing for in-person care, telehealth, or mental health.
California		<p>In-Person Care: Any out of state personnel including to but not limited to medical personnel entering CA to assist in preparation for, responding to, mitigating the effects of, and recovering from COVID-19 shall be permitted to provide services.</p> <p>Telehealth/Mental Health: No mention of telehealth/mental health.</p>
Colorado		<p>In-Person Care: A physician or physician in training may temporarily practice without a CO license if the physician is licensed and lawfully practicing medicine in another state or territory of the US without restrictions or conditions.</p> <p>Telehealth/Mental Health: No mention of telehealth. Psychologists, social workers, marriage/family therapists, psychotherapists, professional counselors may practice in CO for 20 days without a CO license as long as services are within the provider's scope of practice.</p>
Connecticut		<p>In-Person Care: Physicians with an unrestricted out of state license may practice in CT. Restriction of prescribing controlled substances.</p> <p>Telehealth/Mental Health: Executive order includes telehealth</p>
Delaware		<p>In-Person Care: No changes to licensing.</p> <p>Telehealth/Mental health: Out of state providers are permitted to provide telehealth services in DE if they are licensed in another state. Existing restriction on use of telehealth is suspended during the Public Health Threat.</p>
Florida		<p>In-Person Care: Waives licensure requirements for out of state health care professionals who render services in FL related to COVID-19, as long as they do so for the American Red Cross or Florida DOH. **Manatt documentation does not limit this to American Red Cross or FL DOH.</p>

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		Telehealth/Mental Health: No mention of telehealth or mental health.
Georgia		In-Person Care: Physicians can apply for a temporary medical license and are currently licensed as a physician in good standing by equivalent boards in other states. Telehealth/Mental Health: No mention of telehealth or mental health.
Hawaii		In-Person Care: Allows of state physicians/DOs/PAs to practice in HI without a license provided that they have never had their license revoked or suspended; must be hired by a hospital/clinic, etc. Telehealth/Mental Health: No mention of telehealth or mental health.
Idaho		In-Person Care: Temporary medical licenses will be issued to retired and inactive physicians/PAs who have actively practiced within the past 5 years and have held a license in good standing from ID or another state at time of retirement or inactivity. Telehealth/Mental Health: No mention of telehealth/mental health
Illinois		In-Person Care: Physicians whose licenses are expired or inactive for less than three years can temporarily restore their license. Out of state physicians may practice if they hold a license in good standing from another state. Telehealth/Mental Health: No mention of telehealth or mental health.
Iowa		In-Person Care: Emergency licensure expansion extends to physicians whose licenses expired or lapsed (in good standing) within the past five years. Telehealth/Mental Health: Physician can practice medicine or telemedicine in IA without an IA medical license on a temporary basis to aid in the emergency if the physician holds at least one license in good standing from another US jurisdiction. Also extends to physicians whose licenses expired or lapsed in good standing within the past five years.
Kansas		In-Person Care: Providers can apply for emergency temporary licensure during COVID-19 response. Available for all professions regulated by the Board. Must have current license in good standing from another state, have held a license in KS in the past two years (not suspended or revoked as result of investigation or discipline, or currently hold a valid federally active license). Telehealth/Mental Health: No mention of telehealth/mental health.
Kentucky		In-Person Care: Out of state physicians can apply for a temporary license during the emergency.

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		Telehealth/Mental Health: No mention of telehealth/mental health.
Louisiana		In-Person Care: LA emergency declaration provides for emergency licensing for health care providers responding to emergency. Telehealth/Mental Health: No mention of telehealth/mental health
Maine		No changes related to licensing for in-person care, telehealth, or mental health.
Maryland		In-Person Care: Any health care practitioner who holds a valid, unexpired license issued in another state may practice at a health care facility without a Maryland license . All licenses that would expire during the current state of emergency will be extended until one month after the state of emergency is lifted. No mention of telehealth. Telehealth/Mental Health: No mention of telehealth/mental health.
Massachusetts		In-Person Care: Established Emergency Temporary Licensure Application for out of state physicians to meet increased demand. Applicant must hold full, unrestricted license in good standing from another US state. Telehealth/Mental Health: No mention of telehealth/mental health.
Michigan		No changes related to licensing for in-person care, telehealth, or mental health.
Minnesota		No changes related to licensing for in-person care, telehealth, or mental health.
Mississippi		In-Person Care: No changes related to licensing. Telehealth/Mental Health: Out of state physicians may utilize telemedicine when treating patients in Mississippi without a MS license, as long as the physician holds an unrestricted license from another state.
Missouri		No changes related to licensing for in-person care, telehealth, or mental health.
Montana		No changes related to licensing for in-person care, telehealth, or mental health.
Nebraska		No changes related to licensing for in-person care, telehealth, or mental health.
Nevada		No changes related to licensing for in-person care, telehealth, or mental health.

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New Hampshire		<p>In-Person Care: Out-of-state personnel, including medical personnel, that enter NH in order to assist in preparing/responding/treating COVID receive benefit of Section 21-P:41, which states: “Any requirement for a license to practice any professional, mechanical, or other skill shall not apply to any authorized emergency management worker .”</p> <p>Telemedicine/Mental Health: May only cover licensure for in-person (must “enter” New Hampshire) – does not address telemedicine. Depends on interpretation, but Manatt has this listed as a telehealth provision.</p>
New Jersey		<p>In-Person Care: Accelerated “temporary-licensure-by-reciprocity” process waives background checks, fees, and proof of malpractice insurance.</p> <p>Telemedicine/Mental Health: Those with temporary licenses can provide telemedicine and telehealth services. Available to psychologists, occupational therapists, psychoanalysts.</p>
New Mexico		<p>In-Person: New Mexico’s emergency order permits that during an emergency, a person who holds a license, certificate or other permit that is issued by a state or territory of the United States and that evidences the meeting of qualifications for professional, mechanical or other skills may be credentialed, if appropriate and approved by the department of health or the homeland security and emergency management department, to render aid involving those skills to meet an emergency, subject to limitations and conditions as the governor may prescribe by executive order or otherwise. NMSA Citations 12-10-10.1 through 12.10.13.</p> <p>Telemedicine/Mental Health: New Mexico’s order offers broad credentialing privileges – does not specifically mention telehealth or mental health, but would conceivably be up to appropriate state licensure boards to make determinations about who can and can’t appropriately be credentialed for any of these three services. Manatt documents this for telehealth as well.</p>
New York		<p>In-Person Care: Allow physicians (as well as PAs and RNs) licensed and in current good standing in any state in the United States to practice medicine in New York State without civil or criminal penalty related to lack of licensure.</p> <p>Telemedicine/Mental Health: Broadly covers licensure from out of state – would cover telemedicine and certain mental health services. Also cited by Manatt. Telemental health practitioner definition expanded to include any professional, paraprofessional, or unlicensed behavioral health staff who deliver a qualified service via telemental health. Any limitations and restrictions pertaining to the location of the telemental health practitioner while providing services via telemental health are waived.</p>
North Carolina		<p>In-Person Care: NC licensure requirements waived for both medical and behavioral health personnel licensed in US state/DC/territory to provide healthcare within the emergency area (anywhere in NC).</p>

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		<p>Telemedicine/Mental Health: Does not explicitly address telemedicine - licensure waiver is limited to those practicing within the area. Whether telemedicine counts is not addressed in governor’s letter or on licensure board site. Manatt has this provision cited in its guide.</p>
North Dakota		<p>In-Person Care: Any requirement for a license to practice any professional, mechanical, or other skill does not apply to any authorized disaster or emergency worker who, in the course of performing the worker's duties, practices the professional, mechanical, or other skill during a disaster or emergency.</p> <p>Telemedicine/Mental Health: Does not explicitly mention telemedicine or behavioral health services, but could apply given broad language. Manatt has the above in-person measures cited in its guide on telehealth.</p>
Ohio		<p>In-Person Care: The Ohio Board of Medicine has authorized its staff to work with the State Emergency Management Agency, or other identified governmental entities, to effectuate Ohio licensure eligibility for out-of-state doctors who are called upon to respond to the COVID-19 emergency in Ohio. The Board’s language regarding emergency licensure is somewhat vague and does not guarantee that any and all applicants will receive a license. Nevertheless, the Board has, at a minimum, given staff members enhanced flexibility in possibly waiving typical licensure requirements.</p> <p>Telemedicine/Mental Health: No changes related to licensure.</p>
Oklahoma		<p>In-Person Care: Licensed MD and allied practitioners in any Emergency Management Compact states (only 20 states) are deemed licensed to practice in OK upon application.</p> <p>Application (all 50 states listed, but probably only accepted if from a state in the compact)</p> <p>Telemedicine/Mental Health: Does not address mental/behavioral health, but may apply to telemedicine. Manatt has the above in-person measures cited in its guide on telehealth.</p>
Oregon		<p>In-Person Care: Medical board allows physicians and PAs licensed in other states to provide medical care in Oregon with an authorization application.</p> <p>Telemedicine/Mental Health: Out-of-state physicians with a telemedicine license may provide remote care to their Oregon patients. Does not address mental health.</p>
Pennsylvania		<p>In-Person Care: The temporary license requirement that limits a practitioner to participating in a medical procedure necessary for a specified patient was suspended by the Governor. The Governor also suspended several “administrative requirements” in order for the Department to grant temporary licenses on an expedited basis to out-of-state practitioners.</p>

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		<p>Telemedicine/Mental Health: Suspension of requirements will allow licensed practitioners in other states to provide services to Pennsylvanians via the use of telemedicine, without obtaining a Pennsylvania license, for the duration of the emergency. Telemedicine available to out-of-state psychologists and social workers. The governor also approved a suspension of the requirement that supervisors meet individually face-to-face with psychology residents for an average supervisory total of at least 2 hours per week.</p>
Rhode Island		<p>In-Person Care: Rhode Island Department of Health (RIDOH) will be relaxing regulatory enforcement for certain medical professional licensing by issuing temporary (90 day) licenses to professionals holding valid out-of-state licenses. This temporary license can be renewed one time. There will be no cost to obtain the license or for the one-time renewal.</p> <p>Telemedicine/Mental Health: RI DOH: “The Board wishes to make clear that it encourages all physicians to use telemedicine to deliver care to their patients and that the Board will not take action against physicians not licensed to practice in Rhode Island who, during the state of emergency, use telemedicine to deliver care to their established Rhode Island patients.” Manatt does not have this listed. RIDOH regulatory enforcement measures may apply to mental health counselors and psychologists as well.</p>
South Carolina		<p>In-Person Care: The Medical Board can expedite temporary licensure for out-of-state physicians, physician assistants, and respiratory care practitioners within 24 hours. There is no fee for these 90-day temporary licenses. Manatt has this provision cited in its guide on telehealth.</p> <p>Telemedicine/Mental Health: Does not address telemedicine or behavioral health.</p>
South Dakota		No changes related to licensing for in-person care, telehealth, or mental health.
Tennessee		<p>In-Person Care: A health care professional who is licensed in another state, and who would otherwise be subject to licensing requirements under Title 63 or Title 68 (suspended), to engage in the practice of such individual's profession in Tennessee, if such individual is a health care professional who is assisting in the medical response to COVID-19. Suspended all renewal requirements.</p> <p>Telemedicine/Mental Health: Out of state health care professionals authorized pursuant to this Order to temporarily practice in Tennessee are permitted to engage in telemedicine with respect to Tennessee patients if scope of practice of applicable professional license would authorize professional to diagnose and treat humans. Manatt does not have this cited in its guide on telehealth. Broad language could cover in-person and mental health.</p>
Texas		<p>In-Person Care: Texas Medical Board (TMB) will allow out-of-state physicians to obtain a Texas limited emergency license or hospital-to-hospital credentialing for no more than thirty (30) days from the date the physician is licensed or until the disaster declaration has been</p>

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		<p>withdrawn or ended, whichever is longer. Other types of out of state health care professionals regulated by TMB may also receive a temporary license under these rules.</p> <p>Telemedicine/Mental Health: Gov. Statement: “By utilizing TMB and TBN’s disaster emergency licensure rule, Texas will have an increased supply of health care professionals who will be able to provide necessary in-person and telemedicine services to Texans across the state.” However, TMB does not explicitly address telemedicine. Application does not cover mental health professionals.</p>
Utah		No changes related to licensing for in-person care, telehealth, or mental health.
Vermont		No changes related to licensing for in-person care, telehealth, or mental health.
Virginia		No changes related to licensing for in-person care, telehealth, or mental health.
Washington		<p>In-Person Care: Health professionals licensed in other states may practice in Washington by registering through the emergency volunteer health practitioner process or by applying for a WA license, which may result in the department issuing a temporary practice permit.</p> <p>Telemedicine/Mental Health: Does not address telemedicine/mental health explicitly. WA is part of Interstate Medical Licensure Compact. Under this agreement licensed physicians can qualify to practice medicine across state lines within the Compact if they meet the agreed upon eligibility requirements.</p>
Washington, DC		<p>In-Person Care: Licensure, registration or certification requirements, permits and fees shall be waived for healthcare practitioners appointed as temporary agents of the District of Columbia. Any healthcare provider who is licensed in their home jurisdiction in their field of expertise who is providing healthcare to District residents shall be deemed a temporary agent of the District of Columbia.</p> <p>Telemedicine/Mental Health: Above includes telehealth. Broad language may also include mental health, but not explicitly mentioned.</p>
West Virginia		<p>In-Person Care: Suspending the procedures for applications for licensure by out-of-state medical practitioners under the Interstate Medical Licensure Compact.</p> <p>Telemedicine/Mental Health: Suspending the requirement for telemedicine providers to be licensed in West Virginia, provided that such provider possesses a license within their own state. Manatt does not have this cited in its guide on telehealth. Does not address mental health.</p>

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Wisconsin		No changes related to licensing for in-person care, telehealth, or mental health.
Wyoming		<p>In-Person Care: Physicians and physician assistants not licensed in Wyoming may qualify to work here during the declared public health emergency through the “consultation exemption.”</p> <p>Telemedicine/Mental Health: While telemedicine is not addressed, WY is part of Interstate Medical Licensure Compact. Under this agreement licensed physicians can qualify to practice medicine across state lines within the Compact if they meet the agreed upon eligibility requirements. Mental health not addressed.</p>
Guam		<p>In-Person Care: All licensure is waived until the public health emergency terminates, and health care personnel may be appointed to serve for the duration of the emergency.</p> <p>Telemedicine/Mental Health: While this should broadly cover in-person, mental and telehealth, Guam is also part of Interstate Medical Licensure Compact. Under this agreement licensed physicians can qualify to practice medicine across state lines within the Compact if they meet the agreed upon eligibility requirements.</p>
Northern Mariana Islands		No changes related to licensing for in-person care, telehealth, or mental health.
Puerto Rico		<p>In-Person Care: No changes related to licensing. Current medical license law states that PR can grant temporary license to providers with a license in good standing from another state during a state of emergency.</p> <p>Telemedicine/Mental Health: Not addressed.</p>
American Samoa		No changes related to licensing for in-person care, telehealth, or mental health.
US Virgin Islands		No changes related to licensing for in-person care, telehealth, or mental health.