



# COLORADO

Department of  
Regulatory Agencies

Division of Professions and Occupations

July 7, 2020

Marschall S. Smith  
Executive Director  
Interstate Medical Licensing Compact Commission  
5401 S. Prince Street, Office 111  
Littleton, Colorado 80120

Thank you for allowing us the opportunity to respond to the concerns outlined by the Iowa Medical Board.

The Colorado Medical Board and the Colorado Department of Regulatory Agencies, Division of Professions and Occupations, at all times adhere to the requirements set forth in the Interstate Medical Licensure Compact Act, section 24-60-3602, *et. seq.*, C.R.S., and rules promulgated by the IMLCC while striving to offer streamlined opportunities for licensure for applicants via the Interstate Medical Licensure Compact Commission (“IMLCC”).

We believe the allegations of possible non-compliance with expedited licensure via the Interstate Medical Licensure Compact is derived from a misunderstanding of the processes set forth for potential applicants to ensure they have an opportunity for expedited licensure via the compact.

Of note, applicants seeking compact licensure in the state of Colorado are encouraged to engage in a biometric based national level background check at the same time as the filing of an application for licensure via the IMLCC. This process is suggested to potential applicants as the timeline provided to applicants to obtain licensure via the compact is limited to a sixty (60) day time period per IMLCC Rule 5.6(1)(a).

As noted in the IMLCC compliance violation allegation letter, dated June 30, 2020, the Federal Bureau of Investigation (“FBI”) has stated, turn around times for national level biometric based background check, average approximately two to four weeks. With an application timeframe that is limited to sixty days, this time frame acts as a possible barrier for an applicant's opportunity for licensure. To streamline this process we recommend all potential applicants engage in a national level background check prior to filing an application to aid licensure in the allowable time frame. The reported applicants in the IMLCC letter were such applicants, engaging in the national level background check prior to the filing of an application. It should be noted that these national level background checks were undertaken specifically for the purpose of licensure via the IMLCC in compliance with Pub. L. 92-544. While we understand the resulting reported timeframes may create confusion on compliance with federal and state statutory requirements, this process may also act as a model so that applicants seeking expedited licensure are afforded every opportunity to obtain an IMLC license via the compact, and subsequently, a letter of qualification to other participating states.

In reviewing the records in question, all applicants had the appropriate required background checks in place for Colorado to provide the necessary letters of qualification.

CO License #	Name	Date Application received by CO	Date Background Check Received	Application Date	Effective Date of License
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36121	Samuel	8/9/2019	8/13/2019	8/12/2019	8/16/2019
39880	Rosseau	7/18/2019	7/25/2019	7/18/2019	7/25/2019
59946	Ross	8/17/2018	6/19/2018	8/17/2018	8/23/2018
44953	Doyle	5/8/2019	5/10/2019	5/8/2019	5/13/2019
59513	Bryant-Greenwood	10/24/2019	10/22/2019	11/5/2019	11/6/2019
58867	Marks	2/12/2018	2/20/2018	2/20/2018	3/19/2018
60049	Pilgrim	3/22/2018	4/13/2018	3/26/2018	5/1/2019

Accordingly, Colorado was in adherence with PUB. L. 92-544 and with IMLCC Rule 5.5(1)(c) which requires applicants to “[s]ubmit to the state of principal license a completed fingerprint packet or other biometric data check sample approved by the state of principal license.” Rule 5.5(2)(b)(II) then requires the state of principal licensure to “[p]erform a criminal background check pursuant to Public Law 92-544 as required by terms and provisions of the Compact ” before verifying or denying an applicant’s eligibility.

Thank you for sharing your concerns, we hope this response will clear up any confusion about our process and confirm that our streamlined process effectively expedites renewal applications.

Sincerely,  
 Lorey Bratten,  
 Licensing Manager  
 Compact Commissioner

