

INDEX

Interstate Medical Licensure Compact
Policies

#1 - Policy on Policies
#2 - Policy on Conflict of Interest
#3 – Policy on Spending Authority – Executive Committee

1 INTERSTATE MEDICAL LICENSURE COMPACT

2
3 Policies

4
5 **#1 – Policy on Policies**

6
7 ADOPTED: APRIL 1, 2016

8
9 EFFECTIVE: APRIL 1, 2016

10
11 AMENDMENT HISTORY (LIST WHEN AMENDED AND CITE SECTION NUMBER):

- 12 • None

13
14 **I. Policy Statement**

15
16 The Interstate Medical Licensure Compact (IMLC) Commission is committed to
17 providing policies that clearly interpret and provide guidance on its actions in the
18 interpretation, application and administration of the IMLC. Policies are not legally
19 binding, but are intended to provide clarity, guide decisions, or implement a procedure
20 or protocol.

21
22 **II. PURPOSE**

23
24 The purpose of this policy is to establish:

- 25
26 1. A formal mechanism to create, approve, rescind and periodically review IMLC
27 policies.
28
29 2. A central policy archive that is accessible and easy to use.

30
31 **III. DEFINITIONS**

32
33 **Policy** – A policy is a governing set of principals that guide the IMLC Commission in
34 its actions in the application and administration of the IMLC. It helps to ensure
35 compliance with applicable laws and regulations, promotes operational efficiencies,
36 and provides a basis for consistent decision-making, resources allocations or a
37 method of action selected to guide and determine present and future decisions. It
38 mandates actions or constraints and contains specific procedures to follow.

39
40 **Policy action** – A policy may be created, amended or rescinded.
41

42 **Policy development** – Commissioners or IMLC Commission committees may
43 propose policy action. The IMLC Commission will determine the need for policy
44 action pertaining to the interpretation or application of the language and provisions of
45 the IMLC. The IMLC Commission may delegate authority to the executive director to
46 determine the need for policy action for the administration of the IMLC.

47
48 **Policy approval** – The authority to determine which policy action requires approval
49 of the IMLC Commission rests with the executive committee, which shall review
50 proposed policy action and decide to recommend it with or without amendments,
51 return it for further study and analysis, or reject it all together. The Commission may
52 review any approved or rejected policy and choose to vote to approve, rescind or
53 reject such action of the executive committee.

54
55 **Policy maintenance** – All policies will be maintained centrally and will be accessible
56 to all interested persons through the IMLC Commission website. Anyone
57 responsible for creating, distributing or revising IMLC policy shall follow the
58 procedures outlined in this policy.

60 **IV. DEVELOPMENT**

61
62 Proposed policy actions shall be presented in a format that includes:

- 63
64 1. *Policy Statement* – This is a summary of the policy action.
- 65
66 2. *Purpose* – This section addresses what the policy action intends to accomplish.
- 67
68 3. *Definitions* – This section lists and defines specific terms in the policy action.
- 69
70 4. *Development* – This section lists the format of a policy action.
- 71
72 5. *Requirements* – This section delineates the requirements of a policy.

73 74 **V. REQUIREMENTS**

- 75
76 1. An IMLC policy shall be clearly written and understandable and be accessible
77 to the IMLC Commission, member states, and the public.
- 78
79 2. An IMLC policy shall be consistent with applicable laws and regulations and
80 case law.
- 81
82 3. An IMLC policy is effective upon adoption, or shall express an effective date,
83 and the policy shall remain in effect until amended or rescinded by the

84 authorized authority, or as expressed in the policy, such as a sunset clause.
85 The date of amendment(s) to an existing policy shall be expressed, but the
86 original policy adoption date shall be retained.

- 87
- 88 4. All IMLC policies shall be reviewed and updated every five fiscal years or earlier
89 as needed.
- 90
- 91 5. All IMLC policies shall be maintained on the IMLC Commission's website.
92 Policies that are rescinded shall be removed on the effective date of the policy
93 action.
- 94
- 95 6. An IMLC policy action shall be announced in a press release created and
96 distributed by the communications committee.
- 97

98 **VI. RESPONSIBILITY**

99

100 The executive committee shall be responsible for ensuring that all IMLC policies are
101 current, compliant with all statutory requirements and case law, and consistent with
102 other applicable standards. The executive committee may delegate this responsibility to
103 the executive director.

104

105 **#2 – Policy on Conflict of Interest**

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108 ADOPTED: JUNE 24, 2016

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110 EFFECTIVE: JUNE 24, 2016

111

112 AMENDMENT HISTORY (LIST WHEN AMENDED AND CITE SECTION NUMBER):

- 113
- 114 • None
- 115

116 **I. POLICY STATEMENT**

117 Interstate Medical Licensure Compact (IMLC) commissioners and staff members occupy
118 positions of trust and good faith and are obligated to act in the best interest of the IMLC and its
119 member boards without regard to their personal benefit or the interests of other organizations
120 with which they are associated. IMLC commissioners and staff member shall disclose all actual
121 or perceived conflicts of interest and shall recuse themselves from all discussions and decisions
122 when a conflict of interest has been disclosed or identified, unless a majority of the quorum of the
123 IMLC Commission determines otherwise.

124

125 **II. PURPOSE**

126 The purpose of the conflict of interest policy is to foster public confidence and trust in
127 the IMLC Commission and to protect the interests of the IMLC Commission as it
128 conducts its business. This policy is intended to prevent actual or perceived conflicts of
129 from influencing IMLC commissioners or staff members in the performance of their
130 duties.

131

132 III. DEFINITIONS

133

134 **Conflict of Interest** – An actual or perceived conflict of interest exists when a
135 financial or other relationship might directly or indirectly benefit the private or
136 personal interests of an IMLC commissioner or staff member, or prejudice an IMLC
137 commissioner or staff member in business before the IMLC Commission. A majority
138 of the quorum of the IMLC Commission may determine if an actual or perceived
139 conflict of interest exists for an IMLC commissioner or staff member

140

141 **Financial Interest** – Is an interest, whether through commitment, investment,
142 relationship, obligation, involvement, loan, donation, exchange transaction, or
143 otherwise, direct or indirect, that may influence a person’s judgement.

144

145 **Gift** – Is any item or service with monetary value in excess of \$50.00 offered to the
146 IMLC Commission, an IMLC commissioner or an IMLC staff member without the
147 expectation of compensation to the contributor. The gift might be tangible or
148 intangible.

149

150 IV. REQUIREMENTS

151

152 1. **Duty to Disclose.** IMLC commissioners and staff members have a duty to
153 disclose all actual and perceived conflicts of interest for themselves or other
154 IMLC commissioners or staff members.

155

156 2. **Personal recusal.** IMLC commissioners and staff members who disclose a
157 personal conflict of interest shall recuse themselves from all discussions and
158 decisions, on the matter, unless otherwise determined by a majority of the
159 quorum of the IMLC Commission, or by a majority of a committee designated
160 by the IMLC Commission. The recusal shall be recorded in the IMLC
161 Commission minutes or in a disclosure form provided by the IMLC
162 Commission at the initiation of a meeting.

163

164 3. **Commission-directed recusal.** If an IMLC commissioner or staff member
165 becomes aware of the existence of an actual or perceived conflict of interest,
166 the IMLC commissioner or staff member shall provide this information to the
167 IMLC Commission or a committee designated by the IMLC Commission.

168 Upon the commissioner’s own motion, or motion of a party, a majority of the
169 quorum of the IMLC Commission may recuse a commission upon a
170 determination that the actual or perceived conflict of interest raises an
171 unacceptable risk of bias or prejudgment in matters before the IMLC
172 Commission. The recusal shall be recorded in the IMLC Commission minutes
173 or in a disclosure form provided by the IMLC Commission at the initiation of a
174 meeting.
175

176 **4. Gifts.** The IMLC Commission shall maintain a public listing of all gifts.
177

178 **5. Annual review of this policy.** Each IMLC commissioner and staff member
179 shall annually sign a statement which affirms such person:
180

- 181 a. Has received a copy of the conflict of interest policy,
- 182 b. Has read and understands the policy, and
- 183 c. Has agreed to comply with the policy.
184

185 **6. Administration of this policy.** The IMLC Commission executive committee
186 shall be responsible for administering this policy and ensuring that this policy is
187 current, compliant with all statutory requirements and case law, and consistent
188 with other applicable standards. The executive committee may delegate
189 administration and maintenance of this policy to the IMLC executive director.
190

191

192 **#3 – Policy on Executive Committee Spending Authority**

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194 ADOPTED: FEBRUARY 22, 2017

195

196 EFFECTIVE: FEBRUARY 22, 2017

197

198 AMENDMENT HISTORY (LIST WHEN AMENDED AND CITE SECTION NUMBER):

- 199 • None

200

201 **I. POLICY STATEMENT**

202

203 The Interstate Medical Licensure Compact (IMLC) commissioners and staff members are
204 committed to efficiently and responsibility procuring goods and service necessary to carry out the
205 operations of the IMLC; paying bills and expenses; and monitoring all expenditures for
206 compliance with applicable laws, regulations and policies. In order to assure timely, effective
207 business operations, it may be advantageous to delegate limited spending authority to certain
208 groups or individuals.
209

210 **II. PURPOSE**

211

212 The purpose of this policy is to establish:

213

214 • A formal mechanism to empower the Executive Committee spending authority for
215 goods and services **up to \$5,000** without IMLC Commission approval.

216

217 • A formal process for the Executive Committee to delegate signature authority to
218 appropriate parties for purchasing goods or services pursuant to this policy.

219

220 • A definition of qualified expenditures under this policy.

221

222 • A process for reporting expenditures authorized by the Executive Committee or
223 its designees(s) to the IMLC Commission.

224

225 **III. DEFINITIONS**

226

227 **Qualified expenditure** – Any type of goods or services totaling **up to \$5,000**
228 necessary to carry out the day-to-day operations of the IMLC.

229

230 **Signature authority** – Delegation to a designated individual or individuals to sign
231 contracts or other documents authorizing expenditures made pursuant to this policy.

232

233 **IV. REQUIREMENTS**

234

235 **1. Documentation of expenditures.** All expenditures made in accordance with
236 this policy shall be immediately documented in a format established and
237 approved by the IMLC Commission and maintained by the Executive
238 Committee.

239

240 **2. Report.** The Executive Committee shall prepare a report of all expenditures
241 made under this policy to be presented to the IMLC Commission annually, or
242 more frequently if requested by the IMLC Commission.

243

244 **3. Annual review of this policy.** The IMLC Commission Bylaws and Rules
245 Committee shall review this policy each year and make recommendations to
246 the IMLC Commission for continuation or modification of this policy.

247

248 **4. Administration of this policy.** The Executive Committee shall be responsible
249 for administering this policy and ensuring that this policy is current, compliant
250 with all statutory requirements and case law, and consistent with other

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applicable standards. The Executive Committee may delegate administration and maintenance of this policy to the IMLC executive director.